



Serra Mesa Community Plan Amendment Roadway Connection Project: Final Environmental Impact Report

SCH # 2012011048

Project # 265605

Prepared by:
City of San Diego
Planning Department
1010 Second Avenue
San Diego, California 92101

August 2017



FINAL ENVIRONMENTAL IMPACT REPORT

Project No. 265605
SCH No. 2012011048

SUBJECT: SERRA MESA COMMUNITY PLAN AMENDMENT ROADWAY CONNECTION PROJECT

Applicant: City of San Diego Planning Department

FINAL DOCUMENT August 15, 2017:

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

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

PROJECT DESCRIPTION:

The proposed project is an amendment to the Serra Mesa Community Plan. The proposed community plan amendment would revise text and figures in the Serra Mesa Community Plan to show a street connection from Phyllis Place (in Serra Mesa) southward to the boundary between the Serra Mesa and Mission Valley Community Plan areas. Because construction of the roadway connection was determined to be foreseeable, a project-level analysis was conducted and is included as part of the proposed project.

Implementation of the proposed roadway amendment would include the construction and operation of a four-lane major street with landscaped median, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley.

The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to the intersection of Via Alta/Franklin Ridge Road. The project site evaluated throughout the recirculated DEIR encompasses approximately 2 acres, which includes the area required for grading and drainage improvements for the roadway and associated utilities work. The proposed roadway itself would cover approximately 1.25 acre. The proposed project would require two signalized intersections following construction. One signalized intersection would be required at the intersection with Phyllis Place, and the other would be located where the proposed roadway would intersect with Franklin Ridge Road/Via Alta.

PROJECT LOCATION:

The project site is located in the Mission Valley and Serra Mesa communities of the City of San Diego. The project site is immediately south of Phyllis Place, east of Abbotshill Road, and approximately 0.25 mile west of Interstate 805 (I-805). The project site is located within the boundary of the Quarry Falls site, and includes undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an active energy transmission line (four transmission towers) running east-west at the northern portion of the project site, adjacent to Phyllis Place.

A 20-inch gas transmission main is located underground within the vicinity of the transmission line.

ENVIRONMENTAL DETERMINATION:

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

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

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following FEIR in accordance with CEQA. The analysis conducted identified that the project could result in significant and unavoidable impacts in the area of **Transportation/Circulation (Roadway Capacity, Planned Transportation Systems, Traffic Hazards)**, and less than significant impacts with implementation of mitigation measures with regard to **Noise (Construction Noise Levels)**, **Biological Resources (Sensitive Species and Sensitive Habitat)**, **Historical and Tribal Cultural Resources (Historical Resource, Sacred/Religious Use, Tribal Cultural Resource, and Human Remains)**, and **Visual Effects/Neighborhood Character (Landform Alteration)**. All other impacts analyzed in this FEIR were found to be less than or not significant.

RESULTS OF PUBLIC REVIEW:

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


Alyssa Muto, Deputy Director
Planning Department

August 15, 2017
Date of FEIR Publication

Analyst: Susan Morrison, AICP, Planning Department

PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL GOVERNMENT

Federal Aviation Administration (1)
Environmental Protection Agency (19)
U. S. Fish and Wildlife Service (23)
Army Corps of Engineers (26)
MCAS Miramar Air Station (263C)

STATE OF CALIFORNIA

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

COUNTY OF SAN DIEGO

Air Pollution Control Board (65)
Planning and Development Services (68)
Department of Environmental Health (76)

CITY OF SAN DIEGO

Office of the Mayor (91)
Council President Cole, District 4
Councilmember Bry, District 1
Councilmember Zapf, District 2
Councilmember Ward, District 3
Council President Pro Tem Kersey, District 5
Councilmember Cate, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Gómez, District 9

Office of the City Attorney

Keely Halsey, Deputy City Attorney

Planning Department

Jeff Murphy, Director
Tom Tomlinson, Assistant Director
Alyssa Muto, Deputy Director
Laura Black, Deputy Director
Brian Schoenfisch, Program Manager
Sara Osborn, Senior Planner
Susan Morrison, Associate Planner
Samir Hajjiri, Senior Traffic Engineer
George Ghossain, Senior Traffic Engineer
Tanner French, Associate Traffic Engineer
Myra Herrmann, Senior Planner
Rebecca Malone, Associate Planner
Kurt Steinert, Senior Planner
Kristy Forburger, Senior Planner – MSCP
Craig Hooker, Park Planning

Development Services Department

Kerry Santoro, Deputy Director
PJ FitzGerald, Assistant Deputy Director
Mehdi Rastakhiz, Associate Engineer – Civil
Leonard Wilson, Senior Engineer – Civil

Environmental Services Department

Lisa Wood, Senior Planner

Public Utilities Department

Keli Balo

Public Works Department

James Nagelvoort, Director

Park and Recreation Department

Herman Parker, Director

Andrew Field, Assistant Director

Fire-Rescue Department

Brian Fennessy, Fire Chief

Larry Trame, Assistant Fire Marshal

Police Department

Charles Kaye, Acting Assistant Chief, Special Operations

Richard Freedman, Captain, Eastern Division

Andra Brown, Lieutenant, Eastern Division

Kenneth Impellizeri, Acting Lieutenant, Operational Support

Transportation & Storm Water Department

Kris McFadden, Director

Andrew Kleis, Deputy Director

Linda Marabian, Deputy Director

Ruth Kolb, Program Manager

Mark Stephens, Associate Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Program Manager

City Advisory Boards or Committees

Park and Recreation Board (83)

Community Forest Advisory Board (90)

Historical Resources Board (87)

Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A)

Mission Valley Branch Library (81R)

Serra Mesa Branch Library (81GG)

Other City Governments

San Diego Association of Governments (108)

Metropolitan Transit System (112/115)

School Districts

San Diego Unified School District (125)

Community Planning Groups or Committees

Serra Mesa Planning Group (263A)

Mission Valley Planning Group (331)

Community Councils

Serra Mesa Community Council (264)

Mission Valley Community Council (328C)

Other Agencies, Organizations and Individuals

North Park Planning Committee (363)

Save Civita

Stop the Road

San Diego Gas & Electric (114)

Brownstein Hyatt Farber Schreck, LLP

H.G. Fenton Company

Sudberry Development, Inc.

City View Church

Hye Park Homeowners Association

El Dorado Properties, Inc.

Mission Valley Center Association (328)

San Diego Chamber of Commerce (157)

Building Industry Association (158)

Sierra Club (165)

San Diego Canyonlands (165A)

San Diego Natural History Museum (166)

San Diego Audubon Society (167)

Jim Peugh (167A)

Environmental Health Coalition (169)

California Native Plant Society (170)

San Diego Coastkeeper (173)

Citizens Coordinate for Century 3 (179)

Endangered Habitats League (182 & 182A)

League of Women Voters (192)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego History Center (211)

San Diego Archaeological Center (212)

San Diego Highway Development Association

Save Our Heritage Organisation (214)

Ron Christman (215)

Clint Linton (215B)

Frank Brown - Inter-Tribal Cultural Resource Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society Inc. (218)

Kuumeyaay Cultural Heritage Preservation (223)

Kuumeyaay Cultural Repatriation Committee (225)

Native American Distribution

Barona Group of Capitan Grande Band of Mission Indians (225A)

Campo Band of Mission Indians (225B)

Ewiiapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)

Viejas Group of Capitan Grande Band of Mission Indians (225I)
Mesa Grande Band of Mission Indians (225J)
San Pasqual Band of Mission Indians (225K)
Ipai Nation of Santa Ysabel (225L)
La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (225O)
Pechanga Band of Mission Indians (225P)
Rincon Band of Luiseno Indians (225Q)
San Luis Rey Band of Luiseno Indians (225R)
Los Coyotes Band of Mission Indians (225S)

Mary Johnson (263B)
Armida Smith
alhs661@sbcglobal.net
Robert C. Garner, PE
Susan Raines
Sabrina Perrino, MD
Jim Bowers
Mike Neville
Efrain Conrique
Marilyn Atwood
Erin T. Bauer
Marla Bell
Mark Bielsky
Deborah Bossmeyer
Ryan Braidwood
Jim Brown
Sue Buell
Ed and Joan Buselt
Cindy and Pat Canfield
Carrie Hobson
Mary Cash
Kathy and Greg Collier
Julie Corrales
Vikki Coughlin
Bob Crider
Laurel Daly
Gloria and Robert Damm
Luong Dao
Denise Davidson
John W Phillips
Patricia Day-Phillips
Vincent and Angeliquea Di Nino
Richard Dresselhaus
Mark Elliott
Ada Jean Fabish
James Feinberg
Pam Fleming
F. Rasouli
Evan Franz
Joanne M. Friedman

Adam Gardner
Bryce Niceswanger
Joleen Garnett
Matt Gates
Michael Gehring
Dong Han
Alexis Luck
Dave Harris
Virginia Hensley
Christopher Hewitt
Randall Stacey Hicks
Kyle Hinsz
Lorraine Hitchen
Brad Hobson
Nicole Howard
Michael D. and Brooke Hubbard
Brooke Spiering
Sonia Hyncik
Ellen Ichinaga
Perry Jacobson
Kristine Kosak
Julita Johnson
Henry Johnson
April Johnson
Carole Jordan
Patrick Justman
Diane Kemp
Jennifer Kolde
Cicely Kraus
John W. and Anne-Marie Lahr
Billy Lambon
Dr. Sarah Kinnings
Phoebe Lau
Michael J. Luck
Ling H. Ly
Lesley Marples
Matt McBrian
Jon McDowell
Judy McEntyre
Richard F. McEntyre
Laura McKenzie
Kathy McSherry
Andrew Michajlenko
Kelly Michajlenko
Cindy Moore
Brian Mozaffari
Samir Mukherjee
Cory Murphy
Erica O. Nataren
Ricard Nerad
Bryan Noar

Adriana Paez
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Kelley Rogers, PhD, LPC
Ernie Rossow
Robert and Samantha Ruzich
Ryan Benjamin
Sally Smith
Suzanne Sanderman
Paul Santos
Kimberly Alessi
Brad Savall
Donna Schu
Susan Shean
Craig Sherman
Matt Shirley
Tim Shockley
Pastor Troy Singleterry
Peter StClair
Sacha Stevenson
Michael Sullivan
Gabriela Surpi
Christa Swanson
David Thai
Rajeev & Padmini Tillu
Andrea Tobias
Alexander Tse
Robert and Ruth Valentine
Joyce Volen
John Walker
Minjuan Wang
James Warniak
Andrea Winter and Matt Gates
Allen Wu & Grace Yang
Ron Yardley
Matt Kovic & Nancy Lamy
Cuong Nguyen
Jackie Wassilup
Steve Sandeman
Mary Watry
Jamie Moody
Michelle Steinbock
John LaRaia
Douglas and Lauren Frost
Joceline Remigio
Lisa Tansey
Scott Fitzgerald
Irma Villavicencio
Bryan Criger

Areen Yuson
Linda McCormick
Dionne Carlson
Elisa Danielson
Carla Vaidosa
Adam Bunn
Michelle Bunn
Salssa Patino
Rafael Patino
Hector Hernandez
Marta Rebella
Viviane Feilhaber
Anne Khong
Kevin Khusial
Sarah Hancock
Roslyn Ofalla
Elizabeth Rush
Kelly Agrey
Delfin Esposito
Thomas Ramet
Mary Johnson
Edward Lopatin
Ida Rose Florez, Ph.D.
Trevor Currie
Carole Porter
Geraldyn White
Patrick Justman
Carolyn Morris
Paul T. Grandi
Julius Faulkner
Julie Kawakami
James Troy
Ryan R. Waterman
Albert Villanueva
Juan B. Ospina
George Wolfe
Tim Fleming
Jonathan and Magdalena Perry
Henry and Julie Johnson
Daniel James and Steve McCrea
Richard Cain
Richard and Agnetha Stephenson
John Tichenor
Mary Jean Johnson
Henry J. Chang
Thomas Leech
Curtis Carlson
Arnold Tan
Carlo Perez
John W. Murphy
Doug Ceresia

Casey Brown
Marilyn P. Foster
Michael R. Foster
Steven Hill
Michael McDowell
Dan Smith
Carol Wolovnik
Susan DeGuide
Harlan Lowe
Timothy Freiheit
Karen L. Ruggels
Bryan Holt
Carol Ann Ferrell
Mary Wiltord
Ed Chapman
Gil and Mary Lou Degenhardt
Lionel Greve
Ronald B. Guy
H. Eugene Myers
Pat Ibbs
James Beard
Ruby Plouffe

Serra Mesa Community Plan Amendment Roadway Connection Project Environmental Impact Report

Letters of Comment and Responses

According to the California Environmental Quality Act (CEQA) Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This section provides responses to written environmental comments received during the 60-day public review period for the recirculated Draft Environmental Impact Report (DEIR) that started March 29, 2017 and ended May 30, 2017. A total of 113 comment letters were received during the review period. Letters received after the end of the comment period are included as a courtesy.

Comment letters for the recirculated DEIR were received from the following public agencies, organizations, individuals, and Native American tribes that provided comments during the review period. Several comment letters received during the DEIR public review period contained accepted revisions that resulted in changes to the Final Environmental Impact Report (FEIR) text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

Letter A: State Clearinghouse	RTC-5
Letter B: Department of Toxic Substances Control.....	RTC-6
Letter C: California Department of Fish and Wildlife	RTC-9
Letter D: San Diego County Archaeological Society, Inc.	RTC-10
Letter E: North Park Planning Committee.....	RTC-11
Letter F: Save Civita.....	RTC-12
Letter G: Serra Mesa Planning Group	RTC-19
Letter H: Stop the Road.....	RTC-71
Letter I: San Diego Gas and Electric	RTC-75
Letter J: Brownstein Hyatt Farber Schreck, LLP	RTC-78
Letter K: Serra Mesa Community Council	RTC-83
Letter L: H.G. Fenton Company.....	RTC-96
Letter M: Robert C. Garner, P.E.	RTC-98
Letter N: F. Rasouli	RTC-99
Letter O: Sue Buell	RTC-100
Letter P: Areen Yuson	RTC-101
Letter Q: Linda McCormick	RTC-102
Letter R: Sabrina Perrino, MD	RTC-103
Letter S: Jim Bowers.....	RTC-104
Letter T: Douglas and Lauren Frost.....	RTC-105
Letter U: Joceline Remigio	RTC-106

Letter V: Lisa Tansey	RTC-107
Letter W: Julie Fitzgerald	RTC-108
Letter X: Bryan Criger	RTC-109
Letter Y: Irma Villavicencio.....	RTC-110
Letter Z: Andrea Winter and Matt Gates	RTC-111
Letter AA: Elisa Danielson	RTC-114
Letter AB: Adam Bunn.....	RTC-115
Letter AC: Michelle Bunn	RTC-116
Letter AD: Carla Vaidosa	RTC-117
Letter AE: Sarah Hancock.....	RTC-118
Letter AF: Viviane Feilhaber	RTC-119
Letter AG: Marta Rebella	RTC-120
Letter AH: Pat and John Phillips	RTC-121
Letter AI: Raffa	RTC-122
Letter AJ: Raffa Patino.....	RTC-123
Letter AK: Raffael Patino	RTC-124
Letter AL: Salssa Patino	RTC-125
Letter AM: Anne Khong.....	RTC-126
Letter AN: Jennifer Kolde	RTC-127
Letter AO: Hector Hernandez.....	RTC-129
Letter AP: Kevin Khusial	RTC-130
Letter AQ: Pat and John Phillips	RTC-131
Letter AR: Elizabeth Rush	RTC-132
Letter AS: Ida Rose Florez, Ph.D.	RTC-133
Letter AT: Linda McCormick.....	RTC-134
Letter AU: Roslyn Ofalla	RTC-135
Letter AV: Delfin Esposito.....	RTC-136
Letter AW: John and Anne-Marie Lahr	RTC-137
Letter AX: Laure E. & Thomas R. Ramet.....	RTC-139
Letter AY: Douglas and Lauren Frost.....	RTC-140
Letter AZ: Kelly Agrey	RTC-141
Letter BA: Michael D. Hubbard	RTC-142
Letter BB: Mike Neville	RTC-143
Letter BC: Mary Johnson	RTC-145
Letter BD: Edward Lopatin	RTC-146
Letter BE: Mark Elliott	RTC-148
Letter BF: Trevor Currie.....	RTC-150
Letter BG: Denise Davidson	RTC-151
Letter BH: Carole Porter	RTC-153

Letter BI: Geralyn White	RTC-154
Letter BJ: Carolyn Morris	RTC-156
Letter BK: Paul T. Grandi	RTC-157
Letter BL: Patrick Justman.....	RTC-158
Letter BM: Irma Villavicencio.....	RTC-159
Letter BN: Julius Faulkner	RTC-160
Letter BO: Julie Kawakami	RTC-161
Letter BP: Cindy and Pat Canfield	RTC-162
Letter BQ: Cindy Moore	RTC-163
Letter BR: Joleen Garnett.....	RTC-177
Letter BS: Dong Han	RTC-178
Letter BT: Cicely Kraus	RTC-179
Letter BU: Tom Leech.....	RTC-180
Letter BV: Juan B. Ospina	RTC-183
Letter BW: Jonathan and Magdalena Perry	RTC-184
Letter BX: Henry & Julie Johnson	RTC-185
Letter BY: Laura McKenzie	RTC-186
Letter BZ: Michael Sullivan.....	RTC-191
Letter CA: F. Rasouli	RTC-192
Letter CB: Mike Gehring.....	RTC-193
Letter CC: Linda McCormick.....	RTC-194
Letter CD: George Wolfe	RTC-195
Letter CE: Kyle Hinsz.....	RTC-197
Letter CF: Andrew Michajlenko.....	RTC-198
Letter CG: Henry J. Chang	RTC-201
Letter CH: Mary Jean Johnson	RTC-203
Letter CI: James Troy.....	RTC-204
Letter CJ: Albert Villanueva	RTC-205
Letter CK: Adriana Paez.....	RTC-206
Letter CL: Judy and Dick McEntyre.....	RTC-207
Letter CM: Matt Shirley.....	RTC-209
Letter CN: Gabriela Surpi	RTC-210
Letter CO: Robert Ruzich.....	RTC-230
Letter CP: Efrain Conrique.....	RTC-233
Letter CQ: James Warniak.....	RTC-238
Letter CR: Fleming, Tim.....	RTC-240
Letter CS: Mr. Billy Lambon and Dr. Sarah Kinnings	RTC-241
Letter CT: Daniel James and Steve McCrea.....	RTC-242
Letter CU: Richard Cain	RTC-243

Letter CV: Deborah Bossmeyer	RTC-244
Letter CW: Ritchard & Agnetha Stephenson.....	RTC-245
Letter CX: Pam Fleming.....	RTC-246
Letter CY: John Tichenor	RTC-248
Letter CZ: Susan Shean.....	RTC-251
Letter DA: Lesley A. Marples	RTC-252
Letter DB: Rajeev and Padmini Tillu	RTC-254
Letter DC: Adam Gardner.....	RTC-255
Letter DD: Bryce Niceswanger	RTC-260
Letter DE: Ron Yardley	RTC-315
Letter DF: Arnold Tan	RTC-319
Letter DG: Carlo Perez.....	RTC-320
Letter DH: Rincon Band of Luiseño Indians.....	RTC-321
Letter DI: Viejas Tribal Government	RTC-322



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

May 15, 2017

Susan Morrison
City of San Diego
1010 Second Ave., Suite 1200
San Diego, CA 92101

Subject: Serra Mesa Community Plan Amendment Roadway Connection Project
SCH#: 2012011048

Dear Susan Morrison:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 12, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2012011048
Project Title Serra Mesa Community Plan Amendment Roadway Connection Project
Lead Agency San Diego, City of

Type EIR Draft EIR
Description Note: Recirculated

The project site is located in the Mission Valley and Serra Mesa communities of the city of San Diego. The project site is immediately south of Phyllis Place, east of Abbotshill Rd, and approx 0.25 mile west of I-805. The project site is within the boundary of the Quarry Falls site, including an undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric easement, which contains an energy transmission line (four transmission poles) running east-west at the northern portion of the project site, adjacent to Phyllis Place.

The proposed project is an amendment to the Serra Mesa Community Plan. The proposed community plan amendment would revise text and figures in the Serra Mesa Community Plan to show a roadway connection from Phyllis Place southward to the boundary between the Serra Mesa and Mission Valley community plan areas. Because construction of the roadway connection was determined to be foreseeable, a project level analysis was conducted and is included as part of the proposed project.

Lead Agency Contact

Name Susan Morrison
Agency City of San Diego
Phone 619-533-6492 **Fax**
email
Address 1010 Second Ave, Suite 1200
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City San Diego
Region
Lat / Long
Cross Streets Phyllis Place/Murray Ridge Rd, Abbotshill Rd, Via Alta, Franklin Ridge Rd, Friars Rd, Mission Ce
Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways I-805/I-8/SR-163
Airports Montgomery Field
Railways San Diego Trolley
Waterways San Diego River
Schools Elevate Elementary Charter
Land Use Key topographic features of the area consist of a drainage channel and sloping terrain. Area elevations range from approximately

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

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission

Document Details Report
State Clearinghouse Data Base

Date Received 03/29/2017

Start of Review 03/29/2017

End of Review 05/12/2017



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

April 21, 2017

Governor's Office of Planning & Research

Ms. Susan Morrison
Environmental Planner,
City of San Diego Planning Department
1010 2nd Avenue, Suite 1200
East Tower, MS 413
San Diego, California 92101

APR 25 2017

STATE CLEARINGHOUSE

RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR SERRA
MESA COMMUNITY PLAN AMENDMENT ROADWAY CONNECTION PROJECT
(SCH# 2012011048)

Dear Ms. Morrison:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: "Implementation of the proposed project would include the construction and operation of a four-lane major street with landscaped median, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to the intersection of Via Alta/Franklin Ridge Road. The project site evaluated throughout the Recirculated Draft EIR encompasses approximately 2 acres, which includes the area required for grading and drainage improvements for the roadway and associated utilities work. The proposed roadway itself would cover approximately 1.25 acre."

Based on the review of the submitted document DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

A-2

- ↑
2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
 3. If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment.
 4. The EIR states, "The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an active energy transmission line (four transmission towers) running east-west at the northern portion of the project site, adjacent to Phyllis Place." DTSC recommends evaluation, proper investigation and mitigation, if necessary, on onsite areas with current or historical PCB-containing transformers, if present.
 5. The EIR further states, "To the east of the project site is the existing SDG&E easement south of Phyllis Place (within the Serra Mesa Community Planning Area), a vacant portion of the Quarry Falls site, and the Phyllis Place on-ramp to I-805 south." Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is adjacent to I-805, this issue should be addressed in accordance with all applicable and relevant laws and regulations.
 6. The EIR states, "The Quarry Falls site has also historically contained multiple underground storage tanks (USTs) for the purposes of fuel and hot asphalt storage. These USTs were removed as mining operations on the Quarry Falls site phased out. A review of two databases containing existing hazardous material sites was conducted: Envirostor (California Department of Toxic Substances Control 2016) and Geotracker (State Water Resources Control Board 2016). Two cleanup programs were completed and approved prior to construction of the Quarry Falls residential units located just north of Friars Road. Two other leaking UST cases in the vicinity of Friars Road were also completed and are listed as closed. All four of these records are more than 0.5 mile south of the project site."
 - a. Identify the name(s) of the regulatory agency(ies) approved the closure of these four UST sites.
- ↓

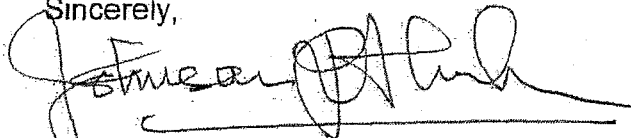
A-2
(cont'd)

A-2
(cont'd)

- b. Indicate whether the UST resulted in groundwater contamination. If groundwater is impacted, then evaluate potential vapor intrusion onsite associated with groundwater contamination.
 - c. Identify the name(s) of the regulatory agency(ies) approved two cleanup programs that were completed prior to construction of the Quarry Falls residential units.
 - d. DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequate due to lack of relevant detailed information in the EIR.
7. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.
8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5476 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

kl/sh/ja

cc: See next page.

Ms. Susan Morrison
April 21, 2017
Page 4

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Guenther W. Moskat, Chief (via e-mail)
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
Guenther.Moskat@dtsc.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2012011048

Clear?
5-12-17
E

From: Weiss, Eric@Wildlife <Eric.Weiss@wildlife.ca.gov>
Sent: Friday, May 12, 2017 6:48 AM
To: DSDEAS@sanidiego.gov
Cc: OPR State Clearinghouse; Patrick_Gower@fws.gov
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
SCH 2012011048

Ms. Morrison,

The California Department of Fish and Wildlife has reviewed the Recirculated Draft Environmental Impact Report (DEIR) for the Serra Mesa Community Plan Amendment Roadway Connection Project, Project No. 265605, State Clearinghouse No. 2012011048. We offer the following comment to assist the City of San Diego (City) in minimizing project related biological impacts.

The proposed project is an amendment to the Serra Mesa Community Plan. The proposed community plan amendment would revise text and figures in the Serra Mesa Community Plan to show a roadway connection from Phyllis Place (in Serra Mesa) southward to the boundary between the Serra Mesa and Mission Valley Community Plan areas. Implementation of the proposed project would include the construction and operation of a four lane major street with landscaped median, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to the intersection of Via Alta and Franklin Ridge Road.

According to the EIR five individuals of San Diego Barrel Cactus (*Ferocactus viridescens*) would be impacted by the road alignment (Dudek, 2015). We encourage the City to translocate the barrel cactus within Multiple Habitat Planning Area (MHPA) or other open space. The City has implemented such measures in the past for San Diego barrel cactus that are directly impacted by development. Although San Diego Barrel Cactus is a MSCP covered species, take of covered species should be incidental, and where appropriate, should be minimized. San Diego barrel cactus is a relatively slow growing species that, when the City is presented with the opportunity, should be salvaged and translocated to a protected location. We encourage the City to adopt additional measures to translocate the species to nearby MHPA or open space.

Thank you for the opportunity to review the Serra Mesa Community Plan Amendment Roadway Connection Project. Please feel free to contact me should you have any questions.

Eric Weiss

Senior Environmental Scientist (Specialist)
California Department of Fish and Wildlife
South Coast Region, Habitat Conservation Planning
3883 Ruffin Road
San Diego, CA 92123

Phone (858) 467-4289

Governor's Office of Planning & Research

MAY 11 2017

STATE CLEARINGHOUSE

Every Californian should conserve water. Find out how at:

Letter A: State Clearinghouse

A-1: The comment notes the State agencies that received the DEIR for comment and the date the comment period closed, and includes one attached letter from the Department of Toxic Substances Control (DTSC) and one attached letter from the California Department of Fish and Wildlife (CDFW). In addition, the comment notes that the project has complied with the State Clearinghouse review requirements for the DEIR pursuant to the California Environmental Quality Act (CEQA).

The City appreciates the Office of Planning and Research's coordination of the DEIR. As indicated, two comment letters were received by the State Clearinghouse. The responses to these individual comment letters are provided under Comment Letter B (DTSC) and Comment Letter C (CDFW).

A-2: This comment includes the letter submitted by DTSC. The responses to this comment letter are provided under Comment Letter B.

A-3: This comment includes the letter submitted by CDFW. The responses to this comment letter are provided under Comment Letter C.

Letter B

From: [Laliberte, Kelly@DTSC](mailto:Laliberte.Kelly@DTSC)
To: [PLN_PlanningCEQA](#)
Cc: State.clearinghouse@opr.ca.gov; [Moskat, Guenther@DTSC](mailto:Moskat.Guenther@DTSC); [Kereazis, Dave@DTSC](mailto:Kereazis.Dave@DTSC); [Haddad, Shahir@DTSC](mailto:Haddad.Shahir@DTSC)
Subject: Recirculated Draft Environmental Impact Report - Serra Mesa Community Plan Amendment Roadway Connection Project (SCH# 2012011048)
Date: Friday, April 21, 2017 3:10:00 PM
Attachments: [image001.png](#)
[Serra Mesa Community Plan Amendment Roadway Connection Project EIR Comments 04.21.17.pdf](#)

Good afternoon:

B-1

Attached for your file is the PDF copy of the comments on the 'Recirculated Draft Environmental Impact Report' for the Serra Mesa Community Plan Amendment Roadway Connection Project (SCH# 2012011048). The original signed document will be sent via regular mail. If you have any questions, please contact Mr. Johnson Abraham, Project Manager, at 714.484.5476 or at email address Johnson.Abraham@dtsc.ca.gov.

Thank you,

Kelly Laliberte

Brownfields Restoration and School Evaluation Branch
Cal EPA | Department of Toxic Substances Control
5796 Corporate Ave | Cypress, CA | 90630
Tel: 714.484.5475 | Fax: 714.484.5411





Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

April 21, 2017

Ms. Susan Morrison
Environmental Planner,
City of San Diego Planning Department
1010 2nd Avenue, Suite 1200
East Tower, MS 413
San Diego, California 92101

RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR SERRA
MESA COMMUNITY PLAN AMENDMENT ROADWAY CONNECTION PROJECT
(SCH# 2012011048)

Dear Ms. Morrison:

B-2

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: "Implementation of the proposed project would include the construction and operation of a four-lane major street with landscaped median, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to the intersection of Via Alta/Franklin Ridge Road. The project site evaluated throughout the Recirculated Draft EIR encompasses approximately 2 acres, which includes the area required for grading and drainage improvements for the roadway and associated utilities work. The proposed roadway itself would cover approximately 1.25 acre."

Based on the review of the submitted document DTSC has the following comments:

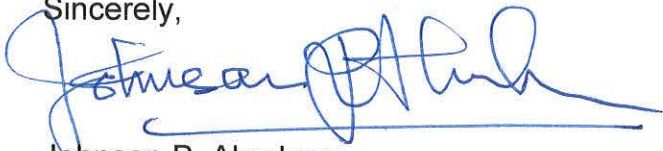
B-3

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

- | | |
|-----|--|
| B-4 | 2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction. |
| B-5 | 3. If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment. |
| B-6 | 4. The EIR states, "The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an active energy transmission line (four transmission towers) running east-west at the northern portion of the project site, adjacent to Phyllis Place." DTSC recommends evaluation, proper investigation and mitigation, if necessary, on onsite areas with current or historical PCB-containing transformers, if present. |
| B-7 | 5. The EIR further states, "To the east of the project site is the existing SDG&E easement south of Phyllis Place (within the Serra Mesa Community Planning Area), a vacant portion of the Quarry Falls site, and the Phyllis Place on-ramp to I-805 south." Aerially deposited lead (ADL) is generally encountered in unpaved or formerly unpaved areas adjoining older roads, primarily as a result of deposition from historical vehicle emissions when gasoline contained lead. As the project site is adjacent to I-805, this issue should be addressed in accordance with all applicable and relevant laws and regulations. |
| B-8 | 6. The EIR states, "The Quarry Falls site has also historically contained multiple underground storage tanks (USTs) for the purposes of fuel and hot asphalt storage. These USTs were removed as mining operations on the Quarry Falls site phased out. A review of two databases containing existing hazardous material sites was conducted: Envirostor (California Department of Toxic Substances Control 2016) and Geotracker (State Water Resources Control Board 2016). Two cleanup programs were completed and approved prior to construction of the Quarry Falls residential units located just north of Friars Road. Two other leaking UST cases in the vicinity of Friars Road were also completed and are listed as closed. All four of these records are more than 0.5 mile south of the project site." |
| ↓ | a. Identify the name(s) of the regulatory agency(ies) approved the closure of these four UST sites. |

- B-8
(cont'd)
- ↓
- b. Indicate whether the UST resulted in groundwater contamination. If groundwater is impacted, then evaluate potential vapor intrusion onsite associated with groundwater contamination.
 - c. Identify the name(s) of the regulatory agency(ies) approved two cleanup programs that were completed prior to construction of the Quarry Falls residential units.
 - d. DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequate due to lack of relevant detailed information in the EIR.
- B-9
7. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.
- B-10
8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.
- B-11
- If you have any questions regarding this letter, please contact me at (714) 484-5476 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

kl/sh/ja

cc: See next page.

Ms. Susan Morrison
April 21, 2017
Page 4

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Guenther W. Moskat, Chief (via e-mail)
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
Guenther.Moskat@dtsc.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2012011048

Letter B: Department of Toxic Substances Control

B-1: This comment is an e-mail transmittal that indicates a comment letter is being submitted by the Department of Toxic Substances Control (DTSC) and provides contact information.

The City appreciates DTSC's interest in the proposed project. This comment does not raise any issues requiring a response pursuant to CEQA.

B-2: This comment is an introductory statement indicating that DTSC is providing comments on the DEIR for the proposed project. The comment also summarizes the proposed project.

The City appreciates DTSC's interest in the proposed project. This comment does not raise any issues requiring a response pursuant to CEQA. The specific comments raised in the pages that follow this introduction are listed separately along with the City's individual responses.

B-3: The comment suggests that the EIR should identify and determine whether current or historic uses at the project site have resulted in the release of hazardous wastes or substances.

As discussed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR, a review of Envirostor (California Department of Toxic Substances Control 2016) and Geotracker (State Water Resources Control Board 2016) was conducted for the project site and the surrounding area. The search yielded information on two cleanup sites located just north of Friars Road that were remediated and closed prior to construction of the Quarry Falls project; however, neither site is within the project site. Two other leaking UST cases in the vicinity of Friars Road, also offsite, were also remediated and are listed as closed. All four of these records are more than 0.5 mile south of the project site.

The project site, itself, is currently vacant and there are no known historical uses that would have stored or used hazardous materials. The project site is also not known to contain any USTs or belowground hazardous materials. As such, the project site would not be located on an existing hazardous material site. Therefore, no changes to the FEIR are required.

B-4: This comment asks if there are any recognized environmental conditions in the project area and, if so, proper regulatory oversight should be undertaken prior to any new development or construction.

Please see the response to comment B-3. There are no open hazardous materials cases within the project site or in its vicinity.

B-5: The comment indicates that if the project would include any building modifications/demolitions, then metals, lead-based paints, asbestos-containing materials (ACMs), and polychlorinated biphenyls (PCBs) should be addressed in accordance with all applicable laws.

The proposed project involves the construction and operation of a four-lane major street extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The project does not propose to demolish and/or modify any buildings or other structures that could potentially contain lead-based paints, mercury, ACMs, or PCBs. No changes to the FEIR are required.

B-6: The comment recommends evaluation and potentially further action if current or historical PCB-containing transformers are present onsite.

According to the Phase I ESA prepared for the Quarry Falls Final PEIR, documented discussions with SDG&E representatives regarding transformers indicated that SDG&E has never specified PCB-containing transformers for its electrical distribution system in the project area. The Phase I ESA further states that it is unlikely that transformers found within SDG&E's service area contain PCBs based on a statistical sampling and testing program performed by SDG&E. No changes to the FEIR are required.

B-7: The comment expresses concerns regarding the potential presence of residual aerially deposited lead in the undeveloped area south of, and adjacent to, Phyllis Place.

Please see the response to B-3. As discussed, the hazardous materials assessment did not identify any potential contamination onsite and there have been no known cases of contamination present within the project site. Lead from historic freeway operations is largely based on proximity (within proximity of 200 meters or closer, concentrations are much higher), wind direction (upwind experiences much lower levels of lead presence in the soil), undisturbed soil where higher concentrations are closer to the surface, and the amount of time exposure has occurred.

The potential for deposits from historical vehicle emissions from use of Interstate (I)-805 (opened in 1975) is limited because the project site is over 1,000 feet and upwind from I-805, grading has occurred on much of the site related to the Civita-Quarry Falls project, and the length of time the freeway has been operational when lead was still used in gasoline is relatively limited (banned in the early 1990s). However, the project would be required to comply with all applicable laws and regulations, including all such laws and regulations that apply to worker safety and the reduction of exposure to any hazardous conditions. Therefore, while the DEIR and evidence in the record indicates there is no potential contamination onsite, the project would still be subject to demonstrating compliance with all applicable laws and regulations, including safe working conditions for all construction workers. No changes to the FEIR are required in response to this comment.

B-8: The comment restates information from the DEIR regarding the historical presence of USTs at the Quarry Falls site and raises four separate issues.

The first issue raised by the commenter requests the name(s) of regulatory agencies that approved closure of USTs. According to Geotracker, the two site cleanup programs were closed by the San Diego County Department of Environmental Health (DEH) on November 18, 2010 and June 29, 2012. In addition, the two LUST cleanup sites were closed by the San Diego County DEH on December 30, 1992 and December 1, 2008. None of these cases indicated contamination of groundwater, which is the issue asked by the second question.

The third issue raised by the comment requests the names of agencies that approved two cleanup programs. As mentioned in Chapter 7 of the DEIR, the two site cleanup programs were closed by the San Diego County DEH on November 18, 2010 and June 29, 2012.

The last issue raised in this comment indicates that DTSC is unable to evaluate whether vapor intrusion is a risk based on the information contained in the EIR. As mentioned, the two LUST cleanup sites were closed by the San Diego County DEH on December 30, 1992 and December 1, 2008. In addition, all USTs have been removed from the site in accordance with the requirements of the San Diego County DEH. Furthermore, the project site is located over 0.5 mile north of these areas and grading in these areas has already occurred as part of the Quarry Falls project. There is little-to-no potential for the project to encounter vapors from over 0.5 miles from these sites.

B-9: The commenter suggests that excavated soil should be sampled if soil contamination is suspected or observed, identifies procedures for disposal of contaminated soil, and recommends sampling of imported soil.

Please see the response to comment B-7. No changes to the FEIR are required in response to this comment.

B-10: The comment poses a condition that if there is the potential presence of contaminated soil and/or groundwater, construction/demolition should cease.

Please see the responses to comments B-3, B-7, and B-8. No changes to the FEIR are required in response to this comment.

B-11: This comment concludes the comment letter and provides a contact name and information.

The City appreciates DTSC's interest in the proposed project. This comment does not raise any issues requiring a response pursuant to CEQA.

From: Weiss, Eric@Wildlife <Eric.Weiss@wildlife.ca.gov>
Sent: Friday, May 12, 2017 6:48 AM
To: DSDEAS@sanidiego.gov
Cc: OPR State Clearinghouse; Patrick_Gower@fws.gov
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
 SCH 2012011048

Ms. Morrison,

C-1

The California Department of Fish and Wildlife has reviewed the Recirculated Draft Environmental Impact Report (DEIR) for the Serra Mesa Community Plan Amendment Roadway Connection Project, Project No. 265605, State Clearinghouse No. 2012011048. We offer the following comment to assist the City of San Diego (City) in minimizing project related biological impacts.

The proposed project is an amendment to the Serra Mesa Community Plan. The proposed community plan amendment would revise text and figures in the Serra Mesa Community Plan to show a roadway connection from Phyllis Place (in Serra Mesa) southward to the boundary between the Serra Mesa and Mission Valley Community Plan areas. Implementation of the proposed project would include the construction and operation of a four lane major street with landscaped median, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to the intersection of Via Alta and Franklin Ridge Road.

C-2

According to the EIR five individuals of San Diego Barrel Cactus (*Ferocactus viridescens*) would be impacted by the road alignment (Dudek, 2015). We encourage the City to translocate the barrel cactus within Multiple Habitat Planning Area (MHPA) or other open space. The City has implemented such measures in the past for San Diego barrel cactus that are directly impacted by development. Although San Diego Barrel Cactus is a MSCP covered species, take of covered species should be incidental, and where appropriate, should be minimized. San Diego barrel cactus is a relatively slow growing species that, when the City is presented with the opportunity, should be salvaged and translocated to a protected location. We encourage the City to adopt additional measures to translocate the species to nearby MHPA or open space.

C-3

Thank you for the opportunity to review the Serra Mesa Community Plan Amendment Roadway Connection Project. Please feel free to contact me should you have any questions.

Eric Weiss

Senior Environmental Scientist (Specialist)
 California Department of Fish and Wildlife
 South Coast Region, Habitat Conservation Planning
 3883 Ruffin Road
 San Diego, CA 92123

Phone (858) 467-4289

Governor's Office of Planning & Research

MAY 11 2017

STATE CLEARINGHOUSE

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Letter C: California Department of Fish and Wildlife

C-1: This comment is an introductory statement indicating that CDFW is providing comments on the DEIR for the proposed project. In addition, this comment provides a summary of the proposed project.

The City appreciates CDFW's interest in the proposed project. This comment does not raise any issues requiring a response pursuant to CEQA. The specific comments that follow this introduction are listed separately (below) along with the City's individual responses.

C-2: The commenter requests that the City translocate the five individuals of San Diego Barrel Cactus that would be affected by the proposed project to within the Multi Habitat Planning Area (MHPA) or other open space.

In response, mitigation measure MM-BIO-1 has been modified to include the translocation of barrel cactus to within an area in the MHPA that is appropriate for this plant. This minor modification to the existing mitigation measure MM BIO-1 is being done at the recommendation of CDFW; however, as noted by the commenter, the San Diego Barrel Cactus is a Multiple Species Conservation Program (MSCP) covered species. Therefore, no new or more severe significant impact would occur and this clarification to the mitigation measure does not meet the requirements under CEQA that would trigger the need for recirculation.

C-3: This comment concludes the comment letter and provides a contact name and information. The City appreciates CDFW's interest in the proposed project. This comment does not raise any issues requiring a response pursuant to CEQA.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 April 2017

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

Subject: Draft Environmental Impact Report
Serra Mesa Community Plan Amendment
Project No. 265605

Dear Ms. Morrison:

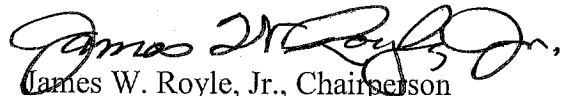
I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

D-1

Based on the information contained in the DEIR, we agree with the program level mitigation measures for historical resources included therein. We will reserve comments on any specific environmental documents issued under the Serra Mesa Community Plan until project-level environmental documents are circulated.

SDCAS appreciates being included in the City's environmental review process.

Sincerely,


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

cc: SDCAS President
File

Letter D: San Diego County Archaeological Society, Inc.

D-1: The commenter states that the San Diego County Archaeological Society has reviewed the DEIR and agree with the proposed mitigation measures for historical resources. The commenter concludes the letter by expressing appreciation for being included in the City's environmental review process.

The City appreciates the San Diego County Archaeological Society's interest in the proposed project. This comment states that the San Diego County Archaeological Society's is in agreement with the proposed mitigation measures for historical resources. This comment does not raise any issues requiring a response pursuant to CEQA.

From: [Dionne Carlson](#)
 To: [PLN_PlanningCEQA](#)
 Cc: [Councilmember Christopher Ward](#); [Molly Chase](#); [Madison, Chloe](#); [Nicole Capretz](#); [Kathleen Ferrier](#)
 Subject: Fwd: Draft Motion mobility NPCPU PEIR comments on Mobility Element Rev01a 20160601
 Date: Friday, April 14, 2017 3:43:20 PM
 Attachments: [NPPC PEIR Comments 20160727 Final.pdf](#)

Attn:
 Susan Morrison, Environmental Planner
 City of San Diego Planning Department
 1010 2nd Ave, Suite 1200
[East Tower MS](#) 413
 San Diego CA 92101

Re: Serra Mesa Community Plan Amendment Roadway Connection Project #265605

Dear Ms. Morrison,

Please consider the below comments and attachment in support of the above project:

1) Attached are The North Park Planning Committee's (NPPC) official comments as submitted to the City on the North Park Community Plan Update EIR. You will find the following relevant excerpts on Pages 8 & 9 of the attachment, which support the provision of a Northern access route from the Civita Development to the 805 freeway:

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

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

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

Street and Traffic Signal Improvements

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

Reasoning: This mitigation measure has been studied and identified by the City of San Diego

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

2) Also among the attached NPPC comments you will find support for increased bicycle and pedestrian connectivity between Planning Areas, specifically those adjacent to the North Park Planning area. Mission Valley is directly adjacent to the North Park Planning area, thus traffic congestion in Mission Valley has direct environmental impacts on residents of the North Park Planning Area (including the Mission-Valley-Canyon-Rim neighborhood of University Heights). Any improved Street connectivity that lessens congestion in Mission Valley, also lessens the environmental impacts on residents in North Park and University Heights, for whom Mission Valley is a key Ingress and Egress route used every day, and also most particularly, during times of emergency.

3) The City of San Diego's recently enacted Climate Action Plan requires the City to provide increased safe, multimodal, "complete streets" connectivity wherever feasible, and particularly to provide such access to parks and recreation areas that people could reasonably walk and bike to. The proposed roadway connection would provide a safe walking and biking experience for residents on the northern Mesa above Mission Valley to access Civita's large public park and recreation facilities, as well as allowing walking and biking access to commercial shopping and restaurants in Mission Valley. It would also provide safe walking and biking access for the residents of Mission Valley and the Civita development to the large church on Phyllis Place.

4) The proposed Redway connection between the Civita development and Phyllis Place would provide a safe northern route for emergency access from both the Civita development, and from Mission Valley. This roadway connection provides not just additional freeway access points in both north and south directions to the 805, but also an additional emergency access route via surface streets on the North East Mesa. (Serra Mesa)

5) Civita is not a "gated" community, and was never designed to be one (see original PEIR and Master Development Plan), with residents of adjacent communities promised public access to its roadways and public parks as mitigation for the environmental impacts of that very large development. Thus, connecting adjacent communities to the Civita development via safe walkable and bike-able roadways, fulfills that promise and the goals of the Master Development Plan.

For all the above stated reasons, the public benefit of providing the proposed roadway connection outweighs the few small negative environmental impacts.

Sincerely,

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NORTH PARK PLANNING COMMITTEE

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July 29, 2016

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

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

Dear City Staff and Decision Makers:

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

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

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

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

E-3
cont.

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

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

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

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

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

Sincerely



**Vicki Granowitz Chair
North Park Planning Committee**

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

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

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

Issue:

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

Solution:

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

E-3
cont.

Urban Design Comments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendation:

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

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

3.4.3.1 Citywide Rezoning (3-20)

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

Recommendation:

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

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

Urban Design Element

Issue:

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

Solution:

Make the following corrections:

Public Realm

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

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

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

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

Core and Mixed-Use Corridors

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

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

Consistent Character Area

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

This Policy does not Exist. Remove this Incorrect Reference.

Gateways and Nodes

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

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

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

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

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

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

3. **UD3.22 promote a strong pedestrian and bicycling orientation along ECB (a-c)**

(Enable these on Pedestrian-Orientation policies in TOD Enhancement Program Streetscapes)

Chapter 13 - Mitigation Monitoring and Reporting Program (MMRP)

13.1 Introduction

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

Recommendations:

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

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

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

Comments:

1. There is a conflict with studying and then dismissing mitigation measures that don't meet our goals.
2. The PEIR should have used VMT to study measures that meet our goals (VMT's intent) and be in conformance with our city's CAP.
3. The City response to the NPPC request to use VMT was, ..."the State has not formalized their rules for VMT so they had no choice but to use LOS." The NPPC finds this specious for the following reasons.
 - a. Other municipalities have been using VMT in the absence of approved state rules and guidelines.
 - b. However the City is constantly updating their own rules, codes, and guidelines. To update rules for VMT would be no different than any other process currently conducted.
 - c. Additionally the City Council recently approved a ban on plastic bags in spite of the fact the State rules on this issue have not been formalized.

Section 6.3: Transportation and Circulation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Street and Traffic Signal Improvements

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

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

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

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

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

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

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

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

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

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

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

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

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

Sidewalk, Pedestrian, and Bicycle Improvements;

- 7) Implement Bike and pedestrian safety improvements to all intersections within and directly adjacent to the Greater North Park Planning area failing to meet an LOS.**
- 8) score of C or higher, including bike-permeable curb extensions to reduce pedestrian exposure to increasing traffic and appropriately designed to accommodate future bike lane infrastructure in all 4 directions.**

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

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

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

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

10) Pedestrian and bike mobility, safety and aesthetic environment enhancements to the following bridges: Adams Avenue over the I-805, Adams Avenue over Texas Street, Howard Ave over the I-805 (ref: SANDAG bike lane project), Fern Street Bridge on 30th Street over Switzer Canyon.

Reasoning: These mitigation measures have been identified by NPPC for inclusion in the North Park IFS, meet the mobility and sustainability goals of the NPCPU, and support the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

11) Implement multimodal traffic & circulation enhancements in the area of Upas and 30th Street, as identified by NPPC for inclusion in the North Park IFS.

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

12) Modify Mitigation TRANS 6.3-19 to increase SANDAG & other funding for community requested multimodal improvements, art, landscaping, and maintenance along the 3 identified SANDAG East/West bike corridors.

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, and supports the City of San Diego's recently enacted Climate Action Plan. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

13) Modify Mitigation TRANS 6.3-4 to enhance all intersections along the 30th street corridor to be bike and pedestrian safe and friendly.

Reasoning: This mitigation measure has been identified by NPPC for inclusion in the IFS, meets the mobility and sustainability goals of the NPCPU, & supports the City of San Diego's recently enacted Climate Action Plan by promoting & encouraging walkability & bikability, thus reducing motor vehicle trips. Parts of this mitigation measure are already funded and included in planning for SANDAG's Mid City Bikeway project.

14) The Transportation and Circulation Section the Draft PEIR (Section 6.3.6) only includes three (3) mitigation measures as feasible because they are included in the Impact Fee Study (IFS) and discards the rest of the mitigation measures: "It is not likely that mitigation measures not included in the IFS would be implemented based on the lack of a funding mechanism and in some cases due to inconsistency of the recommended measure within the mobility goals of the proposed North Park CPU." In addition, those three (3) mitigation measures may not be implemented in time before the

impact occurs: *“Full implementation of these measures cannot be guaranteed because the IFS funding would not be adequate to fully fund the necessary improvements and there is no guarantee that they would be constructed prior to an impact occurring.*

Thus, impacts 6.3-7, 6.3-13, and 6.3-18 would remain significant and unavoidable.”

Therefore, the analysis using LOS not only was inconsistent with the goals and policies of the NPCPU, but also produced mitigation measures that could not be implemented before the impact occurs using the same analysis;

The NPPC therefore requests an analysis using VMT, with mitigation measures that are consistent with the goals and policies of the NPCPU.

- 15) The NPCPU supports the implementation of Complete Streets as mandated by AB 1358. However the LOS analysis included in the PEIR only provides an analysis for single occupancy vehicles and circumvents other modes of transportation such as walking, bicycling, and riding mass transit. Therefore, both the analysis in the traffic study and the mitigation measures in the Draft PEIR do not support the policies of the NPCPU.
- 16) The City should now prepare regulations relating to Vehicle Miles Travelled (VMT) to eliminate the Level-of-Service (LOS) standard of traffic engineering. The CA Office of Planning and Research (OPR) is currently preparing VMT regulations to comply with AB 743; however, there is no reason that the City could not promulgate its own, prior to the OPR 2018 deadline and be ahead of this curve. The City of San Francisco has already adopted its own VMT regulations and there is no reason San Diego could not follow suit. The VMT standard would end the business as usual LOS standard and offer opportunities for the City to implement creative planning within North Park.
- 17) NPPC requests mitigation measures that are in full support of the policies that are contained in the NPCPU [such as ME Goal 6, ME- 3.2, SE-1.1, SE-1.27] and that will be consistent with the Climate Action Plan (CAP). Therefore the NPPC hereby requests Analysis under VMT possible recirculation of the Draft PEIR because the Draft PEIR could have included feasible mitigation measures considerably different from those previously analyzed; mitigation measures that would clearly lessen the environmental impacts of the project.
- 18) Some of the policies listed in Table 6.1-1 (Applicable CPU Policies Related to Land Use) DO NOT match the policies listed in the June 2016 Draft of the NPCPU, specifically from “Parks and Open Space” onward for example, UE-2.17 in the Draft PEIR reads *“Preserve and encourage the continued enhancement of the Adams Avenue “Antique Row” and commercial node”* and UE-2.17 in the NPCPU reads *“Locate and design utilities outside of the sidewalks to maintain a clear path of travel”*. Therefore, due to the inconsistencies in the information provided during public review, correction of these substantive errors recirculation of the Draft PEIR might be warranted.

19) Mitigation Measure TRANS 6.3-6 should be re-worded to identify that the I-805 northbound on-ramp is located at the intersection of University Ave. & Wabash Ave. This is a factual description error.

20) Mitigation Measure TRANS 6.3-21a should be re-worded to clarify that Texas St. is not an at-level intersection with Adams Ave. within the segment from Adams Ave. to El Cajon Blvd. This is a factual description error.

Section 6.5.5 Mitigation Framework - Impact Fee Study

Issue:

An Impact Fee Study (IFS) is cited in Table 3.1 (Project Components), Section 6.3.5, Mitigation Framework, Mitigation Measures TRANS 6.3-7, 6.3-13, AND 6.3-18, however no such study has been released to date by the City for Public Review.

At the April 19, 2016 NPPC Board Meeting, the public was noticed that an overview of the Greater North Park IFS would occur. However no viable details were provided by City Staff. The presentation lacked any substantive information about how the report would be compiled, what was to be contained in the report, how projects would be prioritized, how the NPPC and the public could provide input, or when an IFS would be made available for public review, among other issues. Subsequent requests for release of the Impact Fee Study meet with silence on the part of the City.

On June 29, 2016 (less than one month before the comment period for the PEIR is to close) a two-page list of projects ("The List") was sent to Vicki Granowitz, Chair North Park Planning Committee, with a comment: "...to share the List with the NPPC Board..."

"The List was never made available for public for review, provides no substantive information, lacks prioritization, contains errors, and appears to be incomplete. It provided no information to assist the Board in evaluation of the Transportation & Circulation Mitigation Framework (pg 6.3.44) or any other element that would be expected to be contained in an IFS; including but not limited to Public Facilities, Parks and Recreation and Libraries.

More importantly, a "List" is not a "Study" ("The List" includes no analysis) and since the PEIR cited the "Impact Fee Study", such a study including accompanying analysis should have been made available to the NPPC and the public for review and analysis to coincide with our review of the PEIR.

Conclusion:

The NPPC finds this is a significant and unmitigable error.

Correction:

This error should be corrected by immediately releasing the IFS and accompanying analysis, and either extending the public review period by 30 days or possibly recirculation of the PEIR.

Section 6.7: Historic Preservation

Mitigation Measure HIST 6.7-21 merely re-states the current (and inadequate due to lack of enforcement and implementation) City Policy regarding application of the Secretary of the Interior Standards, and does not provide meaningful mitigation that will continue to protect North Park historic resources during implementation of the NPCPU. Citing a General Plan policy does not constitute a mitigation measure.

Mitigation Measure HIST 6.7-21 states that *“to further increase protection of potential resources – specifically potential historic districts – the City is proposing to amend the Historical Resources Regulations to include supplemental development regulations to assist in the preservation of specified potential historic districts until they can be intensively surveyed and brought forward for designation”*.

- 1) Because the above cited Proposed Draft Historical Resources Regulations (PDHRR) being amended in the Land Development Code (LDC) have neither been finalized, received an appropriate public noticing or vetting, nor have they been analyzed in this PEIR as is required under CEQA.
- 2) These PDHRRs were presented for the first time to the public on July 19, 2016 (less than a week before the end of the public comment period for this PEIR), precluding the possibility of their analysis in this document, therefore rendering these proposed PDHRR no mitigation at all under CEQA.
- 3) The explanation given by City staff that “this PDHRR is no different from the original draft zoning ordinance proposal” is nonsensical, inaccurate, and specious. The NPPC and the North Park Community have consistently placed Historic Resources Protection at the level of very highest importance in their input to the City during this Community Plan Update process. The NPPC and the North Park community have worked hard and unceasingly for 8 years to assist City Staff to meet this most important CPU planning goal. It is entirely unacceptable and un-analyzable under CEQA to have this last-minute change sprung on the community after the community has agreed to accept density increases in exchange for promised increased protections for North Park’s unique historic resources including but not limited to the North Park Main Street commercial area, A Bungalow Court Multiple Listing District and implementation of community identified Historic Districts.
- 4) The content of the proposed amendment of the Historical Resources Regulations has not been finalized or received appropriate public noticing, is not analyzed in this PEIR, therefore cannot be cited as a mitigation.

- 5) There was a lack of information readily available during the public review period and a total lack of analysis of feasible mitigation for impacts to Historic Resources.
- 6) A substantial increase in the severity of an environmental impact such as reduction in historic resources will result unless mitigation measures are adopted that reduce the impact to a level of insignificance. Appropriate and Feasible mitigation measures meeting the goals of the CPU and considerably different from those previously analyzed would clearly lessen the environmental impacts of the project, and should be analyzed and considered.
- 7) The potential Draft Regulation Amendments to the LDC regulations (143.0210) represents a mitigation strategy that is unanalyzed in this PEIR. The NPPC finds it to be substantially deficient and fundamentally problematic. An implementation timeline was presented for the first time at the July 19, 2016 NPPC meeting, it is inadequate and has not been committed to in any official City action. Additionally, funding is inadequate for the task. The NPPC finds these the proposals as presented do not adequately meet the Historic Preservation goals of the NPCPU; there is significant public concern that the PEIR and NPCPU do not provide adequate community-specific protections for historic resources.

The NPPC requests inclusion for analysis in the Draft PEIR the following proportional, reasonable & feasible mitigation measures which DO meet the stated goals of the June 2016 Draft North Park Community Plan, and which would NOT engender further significant and un-mitigable impacts to historic resources:

- 1) Accelerate the implementation schedule for Historic Districts that are identified in Figures 10-3 and 10-4 of the NPCPU. Eight years is an unacceptably long period of time to create eleven (11) historic districts, six (6) of which fall in the “small” range
- 2) of 50 properties or less and three (3) in the “medium” range. Further, 8 years is an unacceptably long period for a newly updated community Plan to be entirely without community-specific Historic Resource protections;
- 3) Increase funding for the Historic Districts that are listed in Figures 10-3 and 10-4 of the NPCPU;
- 4) Amend the NPCPU to Exclude historic resources from development calculations for floor area ratio, to allow additional density when retaining a historic resource; This would meet the General Plan’s goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.

E-3
cont.

E-3
cont.

- 5) Exclude historic resources from parking calculations to provide a reduced requirement when retaining a historic building. This is particularly important in the preservation of bungalow courts; This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.
- 6) Include city-wide transferable development rights (TDR), enabling property owners to buy/sell rights so growth will result in appropriate areas, near transit and amenities. This would meet the General Plan's goal for allowing increased density in the Mid-City Area, facilitating affordable housing, meeting sustainability goals of the Climate Action Plan by retaining existing infrastructure which would not have to go to a landfill, while also meeting the NPCP goal of protecting historic resources from demolition or removal from the area.
- 7) Remove the "1/3 option" in the proposed Land Development Code (LDC) & replace with protections consistent with the Secretary of Interior Standards for Historic Review for all community proposed Historic Districts, including Commercial districts and the proposed Multiple Listing Bungalow Court District. The proposed "1/3 option" is not only not analyzed in this document, it has no precedent or analysis State-wide; whereas the Secretary of the Interior Standards for Historic Review are well documented and analyzed under CEQA as providing mitigation protections, and provide a more consistent and well understood framework, thereby providing greater developer certainty.

Further, the term "original footprint" with regard to the "1/3 Option" is not clearly defined and could lead to trivial disputes. Also, the 2/3 rule does not adequately protect corner properties and will facilitate obtrusive and odd-shaped rear additions, which will be detrimental to a potential district. This provision is confusing and likely difficult to implement, and its potentially very negative impacts to Historic Resources are unanalyzed in this PEIR document.

Solution: Remove "original footprint" language. Include language stating that additional stories and structural changes shall comply with the Secretary of the Interior Standards. Small additions (less than 300 square feet) and façade changes shall be limited to side and rear facades, and be minimally visible from the public rights-of-way.

- 8) In order to effectively protect potential districts from incompatible change, i.e. scale, bulk, rhythm, and materials, for parcels that do not include a historic resource, but are located within a potential district; comprehensive infill guidelines for these potential districts are needed. Infill guidelines are necessary to ensure the potential historic district remains intact until such time when the district is brought forward. Without

E-3
cont.

such guidelines and an analysis thereof, this PEIR fails to analyze potential mitigations to historic resources.

- 9) Because no permit is currently required for so doing, the potential Draft Regulation Amendments to the LDC regulations (143.0210) do not adequately protect historic resources from the installation of replacement doors and windows when placed within the same opening. This lack is detrimental to any potential Historic district, could render the historic asset no longer contributing or eligible for a district, and therefore language should be developed and included in the CPU and LDC requiring such permits. Current City of San Diego General Plan and LDC provide no such protection, thus the PEIR's contention that these documents protect North Park is unsubstantiated.

Solution: All window and door replacements that fall within the proposed Land Development Code must require a building permit. Accordingly, add to Table 132-16B of Section 132.1602, for improvements consisting of replacement windows: (i) replacement windows that do comply with Section 132.1603 will require a

Construction Permit/Process One decision process, and (ii) replacement window that do not comply with Section 132.1603 will require a Neighborhood Development Permit/Process Two decision process.

- 10) To effectively protect the potential district from inappropriate change, infill design guidelines should be created:
- 11) Survey and implement the multiple listing for Bungalow Courts as a stand-alone district: Preservation of these historic affordable housing units meets the goals of the City's Climate Action plan, and their loss to infill development due to inadequate protection would constitute a significant and unavoidable impact under CEQA that an accelerated district implementation would prevent.
- 12) Provide adequate enforceable protections for the potential historic districts. Due to inadequately funded and supported code enforcement, the City has not provided adequate code enforcement for Historic Resources in all areas of the City. City must provide a plan and funding for adequate code enforcement to ensure there is not a loss of historic fabric, rendering buildings no longer contributing to potential districts

Solution: Code Compliance issues within potential historic districts should be near the top of the priority list. In addition to higher monetary penalties, any features removed in violation shall be reconstructed. Residents of potential districts should be provided a direct number to contact officials when work occurs on weekends, evenings, and holidays to ensure against loss of historic fabric by illegal demolition.

- 13) Offer rehabilitation loans and grants, including low- and moderate-income housing loans and grants, and commercial façade improvements grants for both documented and potential historic resources.

Section 6.4 Air Quality

The air quality study showed a 3.6% to 4.8% increase in air pollutants, primarily as a result of increased traffic. Note, however, that the Greenhouse Gas Emissions study used a 3% reduction factor to account for the effects of the tire pressure program and Low Emission Vehicles, and this adjustment factor was not used in the air quality study. In addition, the air quality study simply took the difference between current land use and projected land use and multiplied it by the present-day average pollutants generated per land use unit. This analysis does not take into account the policies in the CPU designed to increase multimodal transportation and decrease Vehicle Miles Traveled, both of which effects would reduce the quantity of air pollutants generated.

Section 6.5: Greenhouse Gas Emissions

Issue

The City's Climate Action Plan (CAP) is meant to play a significant role in reducing greenhouse gases (GHG). This is a significant endeavor and essential to the future of not just North Park but the City of San Diego.

6.5.5 Greenhouse Gas Mitigation Measures concludes that, "All impacts to GHG emissions would be less than significant. Thus no mitigation is required" pg 6.5.13

The NPPC finds this to be a significant error for the following reasons:

The PEIR fails to address or analyze environmental impacts pursuant to CEQA Guidelines Section 15064.4(b) (1), which is the responsibility of the city to provide. The 2016 Draft North Park Community Plan along with the just adopted new city standards for the affordable housing bonus density program will lead to significant increased density at build out.

The PEIR includes no quantitative data or analysis of how the density increase and the resulting increases in traffic and other impacts will affect greenhouse gases. It offers no mitigation to deal with the probable increase in GHG.

Because of errors in the PEIR data, the actual proposed increases in densities outlined in the 2016 Draft NPCPU were not included, making the analysis even more questionable. Data that was included in many parts of the PEIR are from prior drafts on the NPCPU and do not match the current draft NPCPU out for review.

In addition, the Final Supplemental Environmental Impact Report for the Downtown San Diego Mobility Plan SCH #2014121002, April 26, 2016, pages E-8-9 includes quantitative modeling (proving that the City of San Diego has this capability), therefore the same standard of quantitative analysis needs to be provided for North Park. Failing to

provide this analysis for North Park and Golden Hill does not meet the Goals of the City's Climate Action Plan, nor the Analysis Standards required under CEQA.

Conclusion:

In the Coast Law Group's comments, on behalf of the CAP, to the City dated July 8, 2016 they conclude:

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

The NPCPU is one of the four CPUs referenced in the Coast Law Group's letter. The NPPC agrees with this assessment & questions whether a recirculation might be necessary.

Solution:

Consistent with the on-going request by the NPPC, the City should provide quantitative analysis of how the NPCPU meets the strategic targets for multi-modal transit and VMTs in the CAP.

Section 6.6 Noise

Like the air quality study, the noise study showed significant effects largely due to increases in automobile traffic, and like that study, the methodology was to take the difference between current land use and projected land use and multiply it by the present-day average traffic noise generated. This analysis does not take into account the policies in the CPU designed to increase multimodal transportation and decrease Vehicle Miles Traveled and traffic speeds, all of which effects would reduce the volume of traffic noise generated.

Letter E: North Park Planning Committee

E-1: This comment states that the North Park Planning Committee (NPPC) supports the proposed project. It provides an excerpt taken from the committee's public comments on the North Park Community Plan Update EIR that is intended to demonstrate support for the proposed project. This comment also introduces the attachment of the NPPC's comments on the North Park and Golden Hill Community Plan Update Program EIR (PEIR), which the comment states includes reasons for NPPC's support of the proposed project.

The commenter refers to the DEIR as a PEIR; however, the DEIR is not a PEIR but rather is a project-level analysis of the roadway connection. The previously recirculated EIR (July 2016) was a PEIR, as detailed within the notices at the front of the DEIR and Chapter 4, *History of Project Changes*. The comment continues on to state that the Draft PEIR should include mitigation measures described in comment E-2. No changes to the FEIR are required as a result of Comment E-1.

E-2: This comment states that increased access to the I-805 from Civita (Quarry Falls) should occur in order to lessen traffic congestion on Texas Street and Qualcomm Way. The comment goes on to state why the NPPC supports increasing freeway access from Civita (Quarry Falls). This comment presents reasons for support of the project in addition to those referenced with respect to the North Park Community Plan Update PEIR—such as the Climate Action Plan, increased emergency access, and increased public access—that the NPPC supports the proposed project.

The comment does not raise issues with the analysis conducted within the DEIR, though it does generally discuss the Climate Action Plan, emergency access, and public access. The proposed project's conformance with the City's Climate Action Plan is detailed in Section 5.10, *Greenhouse Gas Emissions*. Emergency access is analyzed within Chapter 7, *Effects Not Found To Be Significant*. Public access is analyzed within Section 5.2, *Transportation and Circulation*. The comment generally states support for the proposed project but does not address the adequacy of the DEIR.

E-3: This comment is the attachment of the NPPC's comments on the North Park and Golden Hill Community Plan Update PEIR, which the commenter previously stated includes reasons for NPPC's support of the proposed project, specifically on pages 8 and 9 of the letter. The comment generally states support for the proposed project but does not address the adequacy of the DEIR.

From: [michael hubbard](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Thursday, May 11, 2017 6:27:57 PM
Attachments: [Save Civita - General Comments on EIR - No Freeway Connectors 5-11-17.pdf](#)
[Save Civita - Technical Comments on EIR for No Freeway Connectors 5-11-17.pdf](#)

City Planning:

I've attached a letter compiled by the neighbors of Civita regarding the freeway connector at Phyllis Place and Franklin Ridge Rd.

I, along with my wife and neighbors, vehemently oppose this new roadway. The addition of this road would completely destroy the brand new community of Civita. This is the newest master planned community that the City of San Diego has been talking about for years. A walkable community, a village within the city, a safe place for families to raise and educate their children. Why on earth would the city planners decide that this is a good idea? The roadway has been proposed multiple times and has been rejected every single time. Now that there is a beautiful new community in the old quarry, this roadway makes even less sense. DO NOT RUIN OUR WONDERFUL NEW NEIGHBORHOOD!!

Please take the time to read the attached letter. I'm sure many of my neighbors will be sending you the same letter, or something very similar.

Please.. DO NOT APPROVE THIS NEW ROADWAY!!!

Michael and Brooke Hubbard
2618 Aperture Cir
San Diego, CA 92108

SAVE CIVITA TALKING POINTS - General

FREEWAY CONNECTORS DO NOT BELONG WITHIN THE WALKABLE COMMUNITY OF CIVITA

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector.

Last month the City recirculated 2016's Draft EIR proposal (Environmental Impact Report). This second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.

- If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.
- At what cost? At the degradation of Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.
- The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. **This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.**
- Residents see themselves as Stewards of Civita, not NIMBYs. They are the ones that bought into the City's progressive plan of communities and parks for the future and they are the ones that will make sure it succeeds.
- Home owners in Civita were surveyed and 95% of them are against the freeway connector.
- When Civita owners bought their homes,
 - the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa.
 - the home builder's sales agents downplayed the possibility of the freeway connector. buyers were told the connector "likely won't happen."
 - marketing/Promotion materials touted Civita as the "perfect walkable community."
 - disclosures indicated the connector was a "possibility" not a definite. The 1985 Community Plan included the freeway connector as an "option" not definite.
- The City has already factored this connector into their traffic studies for future growth in Mission Valley. It is apparent the City has planned for this connector all along, but Civita home

F-2

owners were not informed of the City's true intention.

- If the home builders and developer thought that telling the home buyers about the freeway connector would sell homes they would have advertised it. But instead they went out of their way to downplay or omit the possibility of a freeway connector. This indicates they knew there would be difficulty selling homes if everyone knew their residential street was going to become a freeway connector.
- Civita owners are tasked with paying for the new Civita Park that is open to the public. The Civita maintenance assessment district is funded by annual charges of about \$200 to \$300 per housing unit. Adding up to \$600,000 in operational and maintenance cost with the City adding only a small percentage of \$60,000 per year.
 - Via Alta and Franklin Ridge surround the park on both sides. the Park becomes less desirable because of the noise, pollution, traffic, and safety risk the freeway connector will present.
 - The freeway connector will lower home values and create instability in the Civita housing market. This will put a greater burden on the owners who must pay for the public park.
- Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street.
- There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school.
- There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allowed and because of access for emergency vehicles, speed bumps not allowed.
- Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.
- Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.
- The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?
- GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area.

F-2
cont.

- Easy ingress/ egress to Civita in multiple directions will increase the crime rate.
- There are other improvements already approved for Mission Valley that will ease traffic congestion. The intersection of 163 and Friars Road is scheduled to be completely reconfigured to function better. There are other options to improve traffic flow in Mission Valley without having to destroy a neighborhood to do it.
- Stop pushing outdated planning concepts. Where does it end, when does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution?
- The City seems to be at odds with itself. It knows we need more mass transit for the future. It knows people's driving habits must change. But at the same time the City enables this behavior. How do you get people to stop driving when the City keeps building more ways for cars to go?
- Put the time and energy into improving and adding more mass transit in and through Mission Valley. Make it harder to use a car and make it easier to use alternative forms of transportation. Whatever the City does, DO NOT ruin a neighborhood in the process.

Save Civita

Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

F-3

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

F-4

2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?

F-5

3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

F-6

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.
 - a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
 - b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

F-7

5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:
 - Potential new public transit corridors to reduce vehicles;
 - Potential new Riverwalk trolley station and relocated trolley station at Mission;
 - Valley Center to increase ridership;
 - Potential new skyways to UCSD and University Heights;
 - Planned and potential new walking multi-use paths;
 - Planned and potential new cycling paths;
 - Recommendations for roadway and connectivity improvements;
 - Recommendations for new freeway interchanges and improvements;

Save Civita

Continuation of Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

F-8	<p>Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?</p>
F-9	<p>6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?</p>
F-10	<p>Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:</p> <ul style="list-style-type: none"> ▪ The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district; ▪ Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods; ▪ High traffic streets adjacent to residential has been shown to diminish quality of life; ▪ High traffic streets adjacent to residential has been shown to diminish property values; ▪ Impacts safe access to Civita Park; ▪ Impacts safe access to Civita's future grade school; ▪ Impacts safe access to Civita's future community center and dog park; ▪ Easy vehicular ingress/ egress in multiple directions increases crime rates; ▪ Proposed regional traffic impacts residential neighborhoods; ▪ Proposed regional traffic negatively impacts property values; ▪ Proposed regional traffic impacts tranquility, peace and quiet; ▪ Proposed regional traffic impacts nature, air quality and biology; ▪ The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips. ▪ Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic. ▪ Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community. ▪ Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares. ▪ Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable). <p>7. <i>"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:</i></p> <ol style="list-style-type: none"> 1. <i>Whether police and fire response times would be improved with the road connection.</i> 2. <i>Whether the road connection could serve as an emergency evacuation route.</i> 3. <i>Whether it is feasible to make the road available for emergency access only.</i> 4. <i>Whether pedestrian and bicycle access would be improved by the street connection."</i> <ul style="list-style-type: none"> ▪ Why weren't these objectives, as directed by the City Council, used in the studies and analyses?
F-11	

F-11
cont.

- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

SAVE CIVITA TALKING POINTS - Technical

Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

- | | |
|------|--|
| F-12 | <p>1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.</p> <ul style="list-style-type: none">a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments? |
| F-13 | <p>2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?</p> |
| F-14 | <p>3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.</p> <ul style="list-style-type: none">a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?e. How does the Draft EIR address pedestrian safety within the walkable community of Civita? |
| F-15 | <p>4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.</p> <ul style="list-style-type: none">a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback? |
| F-16 | <p>5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:</p> <ul style="list-style-type: none">■ Potential new public transit corridors to reduce vehicles;■ Potential new Riverwalk trolley station and relocated trolley station at Mission;■ Valley Center to increase ridership;■ Potential new skyways to UCSD and University Heights;■ Planned and potential new walking multi-use paths;■ Planned and potential new cycling paths;■ Recommendations for roadway and connectivity improvements;■ Recommendations for new freeway interchanges and improvements; |

F-17	Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?
F-18	6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?
F-19	<p>Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:</p> <ul style="list-style-type: none"> ▪ The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district; ▪ Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods; ▪ High traffic streets adjacent to residential has been shown to diminish quality of life; ▪ High traffic streets adjacent to residential has been shown to diminish property values; ▪ Impacts safe access to Civita Park; ▪ Impacts safe access to Civita's future grade school; ▪ Impacts safe access to Civita's future community center and dog park; ▪ Easy vehicular ingress/ egress in multiple directions increases crime rates; ▪ Proposed regional traffic impacts residential neighborhoods; ▪ Proposed regional traffic negatively impacts property values; ▪ Proposed regional traffic impacts tranquility, peace and quiet; ▪ Proposed regional traffic impacts nature, air quality and biology; ▪ The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips. ▪ Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic. ▪ Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community. ▪ Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares. ▪ Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable). <p>7. <i>"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:</i></p> <ol style="list-style-type: none"> 1. <i>Whether police and fire response times would be improved with the road connection.</i> 2. <i>Whether the road connection could serve as an emergency evacuation route.</i> 3. <i>Whether it is feasible to make the road available for emergency access only.</i> 4. <i>Whether pedestrian and bicycle access would be improved by the street connection."</i>
F-20	

F-20
cont.

- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?
- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

Letter F: Save Civita

F-1: This comment expresses the commenter's general opposition to the project and states that detailed comments compiled by the neighbors of Civita are attached within the letter (responses to these comments are provided below). The comment states opposition of the proposed project but does not address the adequacy of the DEIR or suggest alternatives to the proposed project.

F-2: This comment is a multifaceted comment. The general comment provides numerous opinions as to why the commenter opposes the proposed project and generally states that the DEIR is inadequate. However, it does not provide explanation or specific examples of alleged inadequacies, or other support for the comment.

A comment that does not raise a specific environmental issue does not require a response. Under CEQA, the lead agency is obligated to respond to timely comments with "good faith, reasoned analysis" (CEQA Guidelines 15088(c)). These responses "shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [Where a general comment is made, a general response is sufficient]).

The commenter also restates data from Section 5.2, *Transportation and Circulation*, of the DEIR related to the projected average daily trips (ADTs) along the proposed roadway connection under the long-term (Year 2035) with project conditions. The comment merely cites information from the DEIR, but does not raise issue regarding its adequacy. Additionally, the commenter generally restates an objective of the project, specifically the third project objective to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. Therefore, because the commenter is simply restating a project objective, this comment does not raise any issues not previously disclosed in the DEIR.

The DEIR fully addresses the impacts associated with the proposed project. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (e.g., traffic, noise, biological resources) provided as appendices to the DEIR. The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions.

All environmental impacts are disclosed and analyzed within the DEIR. Based on the analysis presented in Chapter 5 of the DEIR, the project would result in significant and unavoidable direct impacts after mitigation related to transportation/circulation (roadway network capacity, planned transportation systems, and traffic hazards). Based on the analysis provided in Chapter 5, the proposed project would result in significant and unavoidable cumulative impacts related to transportation/circulation.

With the implementation of mitigation measures, the proposed project would result in less-than-significant impacts for the issue areas of noise (construction noise), biological resources (sensitive species and sensitive vegetation communities), historical resources (historical resource, religious/sacred use, tribal cultural resource, and human remains), and visual effects/neighborhood character (landform alteration). Impacts were determined to be less than significant for the issue

areas of land use, air quality, paleontological resources, hydrology and water quality, and greenhouse gas (GHG) emissions. Other issue areas that were determined to be not significant are analyzed in Chapter 7, *Effects Not Found To Be Significant*.

Regarding the commenter's concerns about the project's effects on walkability and pedestrian safety, internal circulation within Civita was developed as part of the Quarry Falls project, including the locations of signalized, designated pedestrian crosswalks. Existing signalized, designated pedestrian crosswalks are located at the intersection of Via Alta and Franklin Ridge Road and the intersection of Via Alta and Civita Boulevard. The proposed road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the City's Street Design Manual. The City's Street Design Manual contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way and for the safe design of intersections. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. During final design of the proposed roadway, the City will determine whether traffic-calming measures are necessary to ensure safe roadway operating speeds. It is assumed pedestrians would use designated crosswalks and comply with applicable City laws and regulations.

Additionally, regarding the commenter's concerns about the project's effects on village character, as discussed in Section 5.9.5 of the DEIR, the proposed project would also not result in significant impacts on the existing or planned character of the area. More recently, it was determined that changes in community character are considered a social and psychological issue and not an environmental issue under the purview of CEQA (*Preserve Poway v. City of Poway*, 245 Cal. App. 4th 560). Accordingly, changes in community character are not considered an environmental impact under CEQA.

This comment also states that the Civita homeowners are tasked with paying for the new Civita Park that is open to the public, and expresses the opinion that the proposed roadway connection would lower home values and create instability in the Civita housing market. The commenter's concerns regarding decreased property values are broad statements and are not issues that are under the domain of CEQA unless attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. Similarly, the issues raised by the commenter related to crime and decreased quality of life are generally not considered issues subject to CEQA, unless crime or decreased quality of life results in a specific physical impact on the environment or there is evidence to indicate that the project would increase crime or decrease quality of life that would lead to a specific physical impact on the environment. The commenter has not provided any substantial evidence as to how a roadway connection would increase crime or why crime or decreased quality of life would result in a specific physical impact on the environment.

The commenter suggests that there are other improvements already approved for Mission Valley that will ease traffic congestion. While these future improvements may improve traffic flow in Mission Valley, they do not address the underlying purpose of the proposed project. As stated in Chapter 3, *Project Description*, of the DEIR, as part of the actions by which it approved the Quarry Falls Project, the City Council initiated a resolution (Staff Recommendation Number 6) that directed City staff to analyze the inclusion of a street connection between Phyllis Place and Friars Road in the Transportation Element of the Serra Mesa Community Plan. The proposed project fulfills the direction provided by the City Council.

Lastly, the comment requests that the City put the time and energy into improving and adding more mass transit in and through Mission Valley. The proposed roadway connection would provide a multi-modal linkage between the Serra Mesa and Mission Valley communities, meaning the roadway would accommodate pedestrians, bicyclists, and vehicles. As detailed in Section 5.2, *Transportation and Circulation*, the proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. It should be noted that the proposed project would not generate new vehicle trips, but rather would result in the redistribution of area traffic patterns. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans.

The comment states opposition of the proposed project but does not address the adequacy of the DEIR.

F-3: This comment states the roadway classifications of Via Alta and Franklin Ridge Road and asks why these roadways are not classified as 2-lane collectors (multi-family). It also asks if the left-hand turn pockets would back up beyond their design capacity.

Via Alta and Franklin Ridge Road are currently constructed or will be constructed as 2-lane roadways with a median; therefore, the 2-lane collector capacity is more commensurate with the existing and future roadway than the 2-lane (multi-family), which is lower. The comment regarding queueing does not specifically raise issues concerning the adequacy of the DEIR.

F-4: This comment expresses concerns regarding pedestrian safety as it relates to schools and additional traffic.

Regarding pedestrian safety, internal circulation within Civita was developed as part of the Quarry Falls project, including the locations of signalized, designated pedestrian crosswalks. Existing signalized, designated pedestrian crosswalks are located at the intersection of Via Alta and Franklin Ridge Road and the intersection of Via Alta and Civita Boulevard. As discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, the proposed roadway and access points have been conceptually designed to be consistent with the City's Street Design Manual (2002). The City's Street Design Manual contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way and for the safe design of intersections. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the City's Street Design Manual. During final design of the proposed roadway, the City will determine whether traffic-calming measures are necessary to ensure safe roadway operating speeds. As such, the proposed roadway connection does not include any design features that would create hazardous conditions for pedestrians and bicyclists. In addition, the project does not propose any changes to the existing designated pedestrian crossings within Civita.

Regarding the commenter's concerns surrounding the potential future school at Via Alta and Civita Boulevard, the suitability of the potential school site would be evaluated by the California Department of Education, which is the agency that approves new school sites. The California Department of Education considers several criteria prior to approving a new school site, including,

but not limited to, the site's accessibility from arterial roads and location relative to major arterial streets with heavy traffic patterns (Title 5, Section 14010, CCR).

No revisions to the FEIR are warranted as a result of this comment.

F-5: This comment states that segments of Via Alta and Franklin Ridge Road will have limited pedestrian crossings with significant distance between crossings. It also states that long-term traffic projections show Via Alta and Franklin Ridge operating at level of service (LOS) C and LOS F, respectively. The comment also asks several questions regarding if the DEIR reviewed the projected volume of pedestrian traffic, pedestrian crossings, and pedestrian safety.

Pedestrian circulation and linkages are detailed within the Quarry Falls Specific Plan. For example, the Specific Plan states: "Streetside sidewalks, separated from the streets by landscaped parkways, occur as pedestrian elements along Quarry Falls Boulevard, Community Lane, Russell Park Way, Via Alta and Franklin Ridge Road. Sidewalks should be provided along local streets and private drives in accordance with the City of San Diego Street Design Manual (November 2002)." Figure 4-14 from the Specific Plan shows the pedestrian circulation and linkages within Quarry Falls and has been included as a figure within the FEIR (see Figure 3-9 within the FEIR). As detailed above in the response to comment F-4, internal circulation within Civita was developed as part of the Quarry Falls project, including the locations of signalized, designated pedestrian crosswalks. The proposed road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the Street Design Manual. It is assumed pedestrians would use designated crosswalks and comply with applicable City laws and regulations. In addition, the response to comment F-4 also addresses pedestrian safety associated with the potential future school in Civita.

Although vehicle traffic along Via Alta and Franklin Ridge Road will increase as a result of the project, the roadways are designed to accommodate this amount of vehicle traffic. In the long-term scenario (Year 2035), the segment of Franklin Ridge Road from Via Alta to Civita Boulevard is projected to operate at an LOS F (see Table 5.2-16 of the DEIR). However, as detailed above, this would not result in an impact to pedestrian safety. Franklin Ridge Road has been designed with sidewalks separated from the streets by landscaped parkways and has multiple crossings and linkages (see Figure 4-14 from the Quarry Falls Specific Plan). Therefore, as adequately detailed in the DEIR, the proposed project would not result in an impact related to pedestrian safety. No revisions to the FEIR are warranted as a result of this comment.

F-6: This comment alleges that the DEIR states that the proposed roadway would relieve traffic from Mission Center Road.

The DEIR does not explicitly state that the proposed roadway would "relieve" traffic from Mission Center Road, nor is it an objective of the proposed project (see Section 3.1 of the DEIR). As detailed in Section 5.2, *Transportation and Circulation*, of the DEIR, the traffic analysis included existing conditions, a near-term scenario, and a long-term scenario. The results of each of these scenarios, both with and without the proposed project, show the differences within traffic along Mission Center Road. For example, Table 5.2-10 shows that the segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road would operate at a Level of Service (LOS) F in the near-term condition without the project and would improve to LOS D with the project. The comment states that the DEIR "argues" that traffic needs to be diverted from Mission Center Road. The DEIR does not make any such statement, nor is it an objective of the proposed project (see Section 3.1 of the DEIR). The comment also states that the DEIR "suggests" that traffic should be "diverted" through Civita. The DEIR does not make any such suggestion, nor is it an objective of the proposed

project (see Section 3.1 of the DEIR). The comment also generally states that the proposed project would not be compatible with the Civita community. The DEIR evaluates land use compatibility of the roadway and the surrounding uses. Please see Section 5.1, *Land Use*, of the DEIR. As discussed in that section, the analysis determined that there would be no incompatibilities between the project and the surrounding land uses that would result in a significant impact on the environment. No changes to the FEIR are warranted as a result of this comment.

F-7: The comment states that an update to the Mission Valley Community Plan is in progress and states numerous intended goals.

It is acknowledged that the Mission Valley Community Plan Update is in progress. This comment does not address the adequacy of the DEIR.

F-8: This comment asks why the City is advancing the proposed project ahead of the Mission Valley Community Plan Update.

Please refer to Section 3.2 of the DEIR. On October 21, 2008, the City Council held a public hearing and approved the Quarry Falls Project. As part of the actions by which it approved the Quarry Falls Project, the City Council initiated an amendment (Staff Recommendation Number 6) that directed City staff to analyze an amendment to the Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Transportation Element. Subsequently, on January 23, 2012, the City's Development Services Department circulated a Notice of Preparation for an EIR for the proposed project, stating that the project included a CPA, site development permit, and construction of the road. Although the comment questions why the proposed project is being analyzed within the DEIR, it does not raise a substantive issue with the analysis conducted within the DEIR. No changes to the FEIR are warranted as a result of this comment.

F-9: The comment asks why a statement on page 55 of the Mission Valley Community Plan was not addressed in the DEIR.

As stated in Section 3.2.1 of the DEIR: Currently, there is a discrepancy between the Mission Valley Community Plan and Serra Mesa Community Plan regarding a roadway connection south from Phyllis Place. The Mission Valley Community Plan calls for a roadway connection; the Serra Mesa Community Plan does not include the connection on the roadway map (included in its Transportation Element).

Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states:

Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I 805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels.

As discussed in Section 5.1.3, *Land Use*, of the DEIR, "...merely being inconsistent with an existing plan or regulation would not necessarily be considered a significant impact under CEQA; rather, the inconsistency must result in a substantial adverse effect on the environment." CEQA Guidelines

Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address, but does not require a discussion of all the policies a project is consistent with. A project is considered inconsistent with the provisions of the identified regional and local plan if it would work in opposition to the attainment of the primary intent of the land use plan or policy. If a project is determined to be inconsistent with specific objectives or policies of a land use plan, but is largely consistent with the land use goals of that plan and would not work in opposition to the attainment of the primary intent of the land use plan, the project would not be considered inconsistent with the plan. In addition, an inconsistency with a specific objective or policy of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment.

As discussed in Section 5.1, *Land Use*, subsection 5.1.5, Impact Analysis, the project would not conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plans or other applicable land use plan. Relevant goals and guidelines from the City of San Diego General Plan and the Serra Mesa Community Plan were compared against the compatibility of the proposed project and its objectives, as the proposed project entails an amendment to the Serra Mesa Community Plan. The proposed project would generally implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan and the Serra Mesa Community Plan. Specifically, the proposed project is consistent with planning goals identified in the Mobility Element of the General Plan, as the roadway would balance the needs of multiple users of the public right-of-way by providing vehicle, bicycle, and pedestrian lanes/sidewalks. It is also consistent with the San Diego Association of Governments' (SANDAG) Regional Transportation Plan and is included within long-term forecast models. Moreover, it would provide a linkage within and between communities (Mission Valley and Serra Mesa) and would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route. Therefore, impacts were determined to be less than significant. No changes to the FEIR are warranted as a result of this comment.

F-10: Please see the response to comment F-2 as well as other responses provided above, as the comment duplicates, in part, previous comments. This comment raises general issues related to traffic, pedestrian safety, land use compatibility, community division, air quality, biology, noise, and alternatives to the project, but does not specifically raise issues concerning the adequacy of, and substantive analysis conducted within, the DEIR.

Please refer to DEIR Section 5.1, *Land Use*, for an analysis on land use compatibility; Section 5.2, *Transportation and Circulation*, for an analysis on traffic and pedestrian safety; Section 5.3, *Air Quality*, for the analysis of the project's air quality impacts; Section 5.4, *Noise*, for an analysis of the project's noise impacts; Section 5.5, *Biological Resources*, for the analysis on the project's impacts on biological resources; and Chapter 9, *Alternatives*, for a range of alternatives to the proposed project that were contemplated. Issues raised by the commenter related to quality of life and property values are not relevant to the substantial environmental analysis conducted pursuant to CEQA. Several commenters stated that increases in traffic on roadways near their residences would decrease property values, and therefore, would cause economic hardship. Neither the redistribution nor the construction of roadway under the proposed project would result in a reasonably foreseeable indirect environmental impact, such as urban decay or deterioration. The proposed project does not introduce a new freeway. Physical decay and deterioration would be unlikely given the City neighborhoods immediately surrounding the project site are within an urban area where thousands of vehicles along roadways currently exist. The implementation of a roadway connection

that connects these roadways would not result in urban decay or deterioration. No changes to the FEIR are warranted as a result of this comment.

F-11: This comment states that the list of issues set forth by the City Council were not used in the studies and analysis within the DEIR.

The commenter erroneously links the list of issues with the project objectives. The objectives set forth by the City are detailed in Chapter 3, *Project Description*, of the DEIR. The list of issues set forth by the City Council as initiated in the amendment (Staff Recommendation Number 6) are analyzed within relevant sections of the DEIR. The first and second issues are analyzed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR. The third objective is analyzed in Chapter 9, Alternatives, as “Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative.” The fourth objective is analyzed within Section 5.2, *Transportation and Circulation*, with the DEIR. No changes to the FEIR are warranted as a result of this comment.

F-12: This comment is identical to comment F-3. Please see the response to comment F-3.

F-13: This comment is identical to comment F-4. Please see the response to comment F-4.

F-14: This comment is identical to comment F-5. Please see the response to comment F-5.

F-15: This comment is identical to comment F-6. Please see the response to comment F-6.

F-16: This comment is identical to comment F-7. Please see the response to comment F-7.

F-17: This comment is identical to comment F-8. Please see the response to comment F-8.

F-18: This comment is identical to comment F-9. Please see the response to comment F-9.

F-19: This comment is identical to comment F-10. Please see the response to comment F-10.

F-20: This comment is identical to comment F-11. Please see the response to comment F-11.

From: [Serra Mesa Planning Group](#)
To: [PLN PlanningCEQA](#)
Cc: [Saidkhanian, Liz](#); [Mayor Kevin Faulconer](#); [CouncilMember Lorie Zapf](#); [Councilmember Scott Sherman](#); [Councilmember Barbara Bry](#); [Councilmember Christopher Ward](#); [CouncilMember Chris Cate](#); [CouncilMember David Alvarez](#); [Councilmember Myrtle Cole](#); [Councilmember Mark Kersey](#); [SDAT City Attorney](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project Project No. 265605
Date: Saturday, May 20, 2017 5:20:07 PM
Attachments: [SMCP Amendment DEIR SMPG FINAL Response Letter May 2017.pdf](#)
[SMPG DEIR Position Statement Inclusion in Staff Report FINAL May 2017.pdf](#)

G-1

Attachments: Serra Mesa Planning Group's 1) Response to the Recirculated DEIR, and 2) Position Statement. The SMPG voted to include the position statement as an overview of the Board's decision at the May 18, 2017 meeting.

Serra Mesa Planning Group

A Recognized San Diego City Planning Group - Serving the Citizens of Serra Mesa

Post Office Box 23315 San Diego, CA 92193
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May 18, 2017

RE: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No 265605

Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

G-2

The Serra Mesa Planning Group (SMPG) discussed the Serra Mesa Community Plan Amendment Roadway Connection Project: Draft Environmental Impact Report at our May 18, 2017 meeting and passed a motion to approve this letter. This letter is the result of a careful review of the Recirculated DEIR and recognition of the permanence and far reaching impacts of a roadway connection. Please note that Civita was formerly called Quarry Falls; and City View Church, formerly First Assembly of God. The Reference section at the end of this letter contains information on references in the letter to other documents.

G-3

According to state CEQA guidelines, Article 7,15088.5 f(1): (g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR. The Recirculated DEIR states "This revised and recirculated Draft Environmental Impact Report (DEIR) analyzes impacts at a project level to ensure that all potential significant environmental effects associated with the project are disclosed." (Chapter 4)

We note at this time that the half-page (Chapter 4 History of Project Changes) is a very broad inadequate response to our detailed 27-page (June 26, 2016) submittal, that does not meet the indicated CEQA guidelines requiring summarizing (sic) the revisions made to the previously circulated draft EIR.

Listed below are specific questions and comments organized by topics.

Omitted in this Recirculated DEIR:

G-4

- Mission Valley Community Plan
 - The Sand and Gravel Re-use Development section (p. 56) states "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan.

G-5

- "Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed." (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

G-6	<ul style="list-style-type: none"> ○ “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (p. 124) <p><i>There are inconsistencies within the Mission Valley Community Plan. Aren’t amendments needed? Explain how it is acceptable to propose an amendment to the Serra Mesa Community Plan when the Mission Valley Community Plan contains contradiction and needs amending.</i></p>
G-7	<ul style="list-style-type: none"> • Emergency access exists from Aperture Circle in Civita to Serra Mesa via Kaplan Drive and can be seen in the Addendum, p. 10. • The completed emergency access and sidewalks at Kaplan Drive provide bicycle and pedestrian access and can be seen in the Addendum, p. 10.
G-8	<ul style="list-style-type: none"> • The developer, Sudberry Properties, has indicated that they would fund the road connection if approved; or if not approved, make improvements to Mission Center Road (described in the Final PEIR for the Quarry Falls Project, p. 11-5). Will this information be added? If not, provide an explanation for the exclusion.
G-9	<p><i>Will each of the above items be added to and discussed in the appropriate areas of the Recirculated DEIR? If not, provide an explanation for the exclusion for each item. For the appropriate items, will the information be used in the analyses and studies? If not, provide an explanation for the exclusion.</i></p>
	<p>Clarification Needed</p>
G-10	<p>What other means of reconciling the Serra Mesa and Mission Valley Community Plans have been attempted?</p>
G-11	<p>The Final PEIR for the Quarry Falls Project, Figure 5.2-3, and the Quarry Falls Specific Plan, Figure 4-16, show a minimum of one trail between Civita and Phyllis Place Park without the roadway connection. The trail provided by the developer can be accessed by pedestrians and bikers and will provide connectivity to the LRT line. Can you include this schematic? If not, provide an explanation for the exclusion.</p>
G-12	<p>Grade</p> <ul style="list-style-type: none"> • Provide documentation for the analysis of the grade. • Can a grading map for the roadway connection (e.g., similar to Figure 3-40, Final PEIR for the Quarry Falls Project) be included? If not, provide an explanation for the exclusion. • The Recirculated DEIR indicates the maximum grade is 7% (3.3.1.1). However, the Final PEIR for the Quarry Falls Project states “A Preliminary Road Profile Evaluation for the segment of Franklin Ridge Road to Phyllis Place has been prepared by TCB/AECOM that determined the grade of the road would be less than 10%; a deviation from standards has been submitted and conceptually approved by the City of San Diego for Franklin Ridge Road.” (p. 900 of 1042) Also, in the same document the road is described as a four lane Major Street. (p. 10-39) According to the Street Design Manual the maximum grade for a Major Street is 7%. (p. 45) Since a deviation from standards is needed, the road connection must be greater than 7%. Additionally, the developer confirmed in May 2017 that the grade of the road from Phyllis Place to the Via Alta/Franklin Ridge intersection would be just under 10% at the steepest section. Explain the discrepancy in maximum grade analysis. • Discuss the grade of the roadway connection as it pertains to ADA requirements.
G-13	<p>Executive Summary</p> <p>Refer to the appropriate sections of this letter for comments that would relate to the Executive Summary.</p>

Objectives

G-14

The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.

What portions of the Recirculated DEIR address the four charged issues identified in the Resolution?

The objectives that are being used for this Recirculated DEIR are different than the ones used in the DPEIR. These are the ones with substantive changes:

G-15

DPEIR	Recirculated DEIR	Change
Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.	Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.	Multi-modal linkage from Friars Road replaces connection from Mission Valley
Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could: <ul style="list-style-type: none"> Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas. 	Improve local mobility in the Serra Mesa and Mission Valley planning areas.	Local mobility replaces overall circulation network
<ul style="list-style-type: none"> Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities. 		Deleted from the Recirculated DEIR

Why were changes made to the objectives?

G-16

The following objectives weren't listed in City Council Resolution 304297 (October 2008):

- Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
- Improve local mobility in the Serra Mesa and Mission Valley planning areas.

<p>G-16 (cont'd).</p>	<p>↑</p> <ul style="list-style-type: none"> • Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. • Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. • Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts. <p><i>What is the source for the objectives not stated in the Resolution? Will the source for the objectives be added? If the source isn't added, provide an explanation for the exclusion.</i></p> <p>Provide a concise description of the justification for the project.</p>
<p>G-17</p>	<p>NOP and Scoping Meeting</p> <p>The General Plan and Community Plan Amendment Manual, Appendix D, List of Possible Issues, states "Note: this list includes issues that have been previously analyzed in plan amendments, however any issue identified by staff, the public, or a decision maker should be analyzed as well." Why weren't the following items, excerpted and quoted, from letters that were submitted by the community mentioned, discussed and/or studied in the Recirculated DEIR?</p>
<p>G-18</p>	<p>Project Description: "Since there will be emergency access at Kaplan Drive and pedestrian and bicycle access whether or not the road connection is built, how will a study be conducted? What will be the criteria for analyzing and evaluating improvement?"</p>
<p>G-19</p>	<p>Aesthetics: "Substantially degrade the existing visual character or quality of the site and its surroundings? This has been marked as Less Than Significant Impact. Without the road connection there would be a contiguous park. How would a "four lane major artery" with its traffic and noise not have a significant impact on the visual character and quality of the site and its surroundings?"</p>
<p>G-20</p>	<p>Air Quality: "What is the grade for the road connection?" "Will it impact the Senior Housing located at San Diego First Assembly of God?" "What is the anticipated amount of time for queuing during peak traffic times?" "How much pollution is expected during this time?"</p>
<p>G-21</p>	<p>Hazards and Hazardous Wastes:</p> <p>"The discussion mentions Faith Community School but it doesn't mention the Senior Housing at San Diego First Assembly. What would be the potential health risks for the Senior Housing which is not separated by a buffer and includes a vulnerable population?"</p> <p>"The discussion doesn't mention the emergency connection at Kaplan Drive that is included in the Civita Development. What benefits and impacts will the Kaplan Drive emergency connection provide? If the road connection were not there, how much extra time is needed to access this connection?"</p>
<p>G-22</p>	<p>Public Services:</p> <p>"The discussion doesn't include the Kaplan Drive emergency connection. What benefits and impact will the Kaplan Drive emergency connection provide?"</p>

Land Use

G-23	According to the Significance Determination Thresholds land use compatibility impacts may be significant if the project would result in “Development or conversion of general plan or community plan designated open space...” (p. 46) Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that’s needed for the park if it is split in two and/or the widening of Phyllis Place require open space land? If affirmative, discuss the significant impact on land use.
G-24	The DPEIR referenced consistency with the bicycling goals in the Mobility Element including “A safe and comprehensive local and regional bikeway network”. This Recirculated DEIR doesn’t include the following policy, “Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations.” (Policy ME-F.2.a) Since the roadway connection will create an unsafe situation for vehicles entering and exiting the City View Church driveway and bicycle lanes would be removed if at least six of the mitigations were implemented, discuss the consistency of the roadway connection with this policy. (Note: Since not all of the mitigations are described in detail, it’s hard to determine the exact number of mitigations that would require removal of bike lanes for implementation.)
G-25	What criteria was used to determine the project’s consistency with the City of San Diego 2008 General Plan (refer to Table 5.1-1)?
G-26	Listed below are the comments to Table 5.1-1, Proposed Project’s Consistency with the City of San Diego 2008 General Plan. The list identifies the items and the appropriate section of the General Plan. Will each of these items be included in the table? Will questions be answered and explanations provided? If not, provide an explanation for the exclusion of any item.
G-27	<ul style="list-style-type: none"> The Mission Valley Community Plan in the Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t this statement mentioned? (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
G-28	<ul style="list-style-type: none"> “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (Mission Valley Community Plan, p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan. (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
G-29	<ul style="list-style-type: none"> “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (Mission Valley Community Plan, p. 124) The road would extend above the 150-foot elevation contour. (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
G-30	<ul style="list-style-type: none"> Mission Center Road is a direct connection from Murray Ridge Road in Serra Mesa to Friars in Mission Valley. (Policy LU-C.2.f; D. Plan Amendment Process Goal 1; Environmental Justice Goal 1; Policy LU-I.11; C. Street and Freeway System Goal I; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6)
G-31	<ul style="list-style-type: none"> Two linkages from Serra Mesa to Mission Valley exist – Mission Center Road and Mission Village Drive. (C. Street and Freeway System Goal II)
G-32	<ul style="list-style-type: none"> The traffic studies describe an increase in traffic congestion in Serra Mesa. (Policy LU-C.5.c; C. Street and Freeway System Goal III; Policy ME-C.1; C. Street and Freeway System Goal I) Explain how the increase in traffic congestion meets the goal of “Vehicle congestion relief”. (C Street and Freeway System Goal III)

G-33	<ul style="list-style-type: none"> The primary purpose for the roadway connection, a collector road, is access to I-805. Provide an explanation for how this meets the ME goal of “Safe and efficient street design that minimizes environmental and neighborhood impacts” and ME-C.3 regarding “choice of routes to neighborhood destinations” and “designed to control traffic volumes”.
G-34	<ul style="list-style-type: none"> The developer will provide a minimum of one trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; F. Bicycling Goal; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7)
G-35	<ul style="list-style-type: none"> Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. Why wasn’t this considered in the Recirculated DEIR? (C. Street and Freeway System Goal I)
G-36	<ul style="list-style-type: none"> The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. Why wasn’t this considered in this Recirculated DEIR? (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; F. Bicycling Goal; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7; I)
G-37	<ul style="list-style-type: none"> Two park designs (one with the roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park. <ul style="list-style-type: none"> “The proposed project would somewhat divide the park by placing a roadway in between the two portions of it.” (5.1.4.1) Phyllis Place Park will definitely be split into two with the project. It’s only logical that there would be more safety issues (e.g., children playing ball, flying a kite, etc.). Describe the potential for safety issues. (A. Walkable Community Goal II) Splitting a park into two with a roadway connection will impact the park aesthetically. Why wasn’t this discussed as an impact since the view of the roadway connection from the eastern park portion will be visible on two sides? (Policy UD-C.7)
G-38	<ul style="list-style-type: none"> What is the maximum grade of the roadway connection? <ul style="list-style-type: none"> Will this grade impact “grading plans to provide convenient and accessible pedestrian connections”? (Policy ME-A.6) Is this grade superior for emergency access compared to Kaplan Drive? (Street Design Manual) What are the impacts of this grade on ADA requirements? (Street Design Manual) Is this grade suitable for mass transportation? (Street Design Manual) Discuss traffic waiting times and if stopping and starting on such a grade is feasible for mass transportation? (CE-31-32; LU-I.14) Discuss the grade of the roadway connection and the impact a roadway connection will have on the divided Phyllis Place Park (Policy UD-B.5)
G-39	<ul style="list-style-type: none"> Would a trail accessible to bikers be safer than the Class II bike lanes on the Franklin Ridge Road connection? (F. Bicycling Goal)
G-40	<ul style="list-style-type: none"> The roadway connection is not a transportation improvement for the existing Serra Mesa development adjacent to the Civita development. It would not provide improved access times to increase or provide benefit for the walking community. (Policy ME-K.4)

G-41	<ul style="list-style-type: none"> Explain how the proposed project would maximize the public viewshed of Mission Valley, as seen from Serra Mesa when the approved Phyllis Place Park is constructed. (Policy UD-C.6)
G-42	<ul style="list-style-type: none"> Explain how the roadway connection would reduce congestion when the traffic studies indicate more congestion in Serra Mesa. (Policy ME-C.2)
G-43	<ul style="list-style-type: none"> “Design new connections, and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations.” (Policy UD-C.6)
G-44	<ul style="list-style-type: none"> Explain how the roadway connection, which would increase ADTs from 2,420 (existing) to 34,540 (2035) on Phyllis Place would meet the goal of “Minimal excessive motor vehicle noise on residential and other noise-sensitive land uses.” Also, it’s stated that the “City can, however, influence daily traffic volumes and reduce peak-hour traffic by promoting alternative transportation modes.” (Citations from p. NE-9, Noise Element)
G-45	<ul style="list-style-type: none"> Describe the transit services that would become “more readily available” (5.2.7.3) to those living in the community of Serra Mesa. Bus service is available on Murray Ridge Road and trolley access is available via Mission Center Road. The majority of Serra Mesa residents live closer to Mission Center Road, so traveling further to Phyllis Place would be less convenient. (Proposed Project column for Policy LU-I.11)
G-46	<ul style="list-style-type: none"> The Street Design Manual contains guidelines for street design. The streets described in this manual don’t seem to fit the roadway connection – number of lanes, ADTs, and grade. Discuss how the design will meet the Street Design Manual guidelines. If the roadway won’t meet the guidelines, discuss the required deviations. Note: Deviations for this roadway connection are mentioned in City Council Resolution 304295, p. 15 of 28 (October 2008).
G-47	<ul style="list-style-type: none"> The Mobility Element of the General Plan discusses street design. Discuss the pedestrian barrier to the segmented park that the four lane roadway will create. (ME-C.3)
G-48	<ul style="list-style-type: none"> These statements are extracted from the Mobility Element: “Design roadways and road improvements to enhance and maintain neighborhood character”; “Avoid or minimize disturbances to natural landforms”; “Emphasize aesthetics and noise reduction in the design, improvement, and operation of streets and highways”. Discuss the roadway connection in relation to the above policies. (ME-C.6)
G-49	<ul style="list-style-type: none"> A goal of the Transportation Demand Management section in the Mobility Element is “Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction.” Discuss the reasons for supporting construction of a roadway and mitigations requiring widening of streets rather than working on improving performance and efficiency of the existing Mission Valley streets and SR-163.
G-50	<ul style="list-style-type: none"> Final PEIR for the Quarry Falls Project, Statement of Overriding Considerations (p. 109) – “Quarry Falls is consistent with the General Plan which implements the City of Villages Strategy of focusing growth into pedestrian friendly mixed-use activity centers with connections to the regional transit system.” The emphasis in Civita has been on walkability. How does a roadway connection increasing traffic on local streets in Civita fit the City of Villages Strategy?
G-51	<p>Listed below are the comments to Table 5.1-2, Proposed Project’s Consistency with the Serra Mesa Community Plan (SMCP). Will each of these items be included in the table? If not, provide an explanation for the exclusion of an item.</p> <ul style="list-style-type: none"> Retain the residential character of Serra Mesa. A roadway connection which will increase the ADTs from 2,420 (existing) to 34,540 (2035) impacts the residential character. (Plan Elements, p. 5 of SMCP)

G-52	<ul style="list-style-type: none"> Splitting a park into two with a roadway connection will impact the landscape and hillside. (Proposal Street and Highways, p. 41 of SMCP)
G-53	<ul style="list-style-type: none"> Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. (Proposal – Fire Protection, p. 25 of SMCP)
G-54	<ul style="list-style-type: none"> The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. (Parks & Recreation Element Goals, p. 18 of SMCP)
G-55	<ul style="list-style-type: none"> The developer will provide a minimum of one trail between Phyllis Place Park in Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Proposal – Bicycles Routes, p. 42 of SMCP; Parks & Recreation Element Goals, p. 18 of SMCP)
G-56	<ul style="list-style-type: none"> “To provide a safe, balanced, efficient transportation system with minimal adverse environmental effects.” The roadway connection will adversely impact the environment. (Transportation Element – Goals, p. 41 of SMCP)
G-57	<ul style="list-style-type: none"> Phyllis Place Road is required to be widened. This conflicts with “Street widening and other improvements should be minimized...” (Transportation Element – Proposals Streets and Highways, p. 41 of SMCP)
G-58	<ul style="list-style-type: none"> Two park designs (one with the roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park. <ul style="list-style-type: none"> Splitting a park into two with a roadway connection could create a safety issue. (Objective – Physical Environment-Urban Design, p. 50 of SMCP) Splitting a park into two with a roadway connection will impact the park aesthetically. (Objective – Physical Environment-Urban Design, p. 50 of SMCP)
G-59	<ul style="list-style-type: none"> Will the roadway connection traverse through open space? Or will the additional space that’s needed for the park if it’s split in two or the Phyllis Place widening mitigation require open space land? If affirmative, explain how this would meet the goal that “Open space should be preserved.” (Environmental Management Element, p. 48 or SMCP)
G-60	<ul style="list-style-type: none"> An objective is “To designate Multiple Species Conservation areas, canyons and hillside for preservation as open space and for strictly controlled utilization for the enjoyment of this generation and in perpetuity.” Also, listed in the Proposals is “Steep hillsides and canyons should be protected and preserved in a natural state. Where development is permitted, very low-density urbanization should occur. Natural features should be enhanced and areas of high scenic value and environmental sensitivity conserved. This proposal can be implemented with steep hillside guidelines, open space zones and PRD which is in character with the surrounding neighborhood.” Explain how a roadway connection meets the objective and proposal of the community plan. (Environmental Management Element, p. 48 of SMCP)

5.2 Transportation/Circulation and Parking

Data

Data Collection

G-61

- The Notice of Preparation meeting was held in February 2012. True Count conducted event counts for intersections in May 2012, November 2012 and in May 2013. MetroCount Traffic Executive conducted the segment count in June 2011 (prior to the NOP). Pacific Technical Data prepared the intersection turning movement counts in May-June 2013. Katz, Okitsu & Associates conducted the peak hour intersection and arterial analysis in April 2012. Koa Corporation confirmed the data in 2013 and prepared the Traffic Impact Study in 2015 for the 2016 PEIR. Chen Ryan is the preparer for this 2017 Recirculated DEIR. Given that there have been multiple consulting companies involved in the data collection and analysis and actual counts are based on either 2011, 2012, or 2013 data, discuss the validity of this Traffic Impact Study.
- The Traffic Impact Study Manual states that “The count data used in traffic impact studies should be no more than two years old. If recent traffic data is not available from the City, current counts must be made by the consultant.” (p. 10) Discuss this guideline in relationship to the count data that was collected more than two years ago. If the data is deemed “too old”, will a new study be conducted and this Recirculated DEIR updated to reflect the new data?

G-62

- Describe the procedure used to determine the near-term data.
 - Is the near-term data for intersections based on the data collected in 2011 and/or 2013?
 - If the near-term data for intersections is based on the 2011 data, were projects developed after 2011 included in the analysis? If so, provide the name and size of these developments.

G-63

- These questions are appropriate if data collected in 2011 and/or 2013 was used as a basis for the near-term data.
 - Were the traffic studies in 2011 and 2013 conducted when school was in session?
 - Were they conducted at the same period of time of the day and on the same day of the week?
 - What method was used for traffic volume count?
 - Why weren't other methods selected, e.g., automatic method which could provide 24 hours of the day and all days of the week recording at multiple locations? Would this type of study provide better data for long term projections?

If there is inconsistency in the study conditions between the two sets of studies, is the data valid? If yes, provide an explanation for validity. If no, will the study be redone?

G-64

- Near-Term 2017 baseline traffic conditions inaccurate and incomplete: The Traffic Impact Study includes traffic volumes in 3 scenarios: Existing Conditions 2013, Near-Term 2017, and Long-Term 2035. The study uses the comparison of Near-Term Baseline with No Project and Near-Term with Project to identify significant traffic impacts. While the data for 2013 Existing Conditions were obtained through machine data collected in the field in 2011 and 2013 (Appendix C, 2017 Traffic Impact Study, Chapter 3, Section Existing Traffic Volumes), the data for the 2017 Near-Term conditions was estimated. The estimation was done with a SANDAG computerized travel forecast model. “City Staff also accounted for all known and proposed development projects that were not otherwise accounted for in the model that would affect the study area ... Poor model performance in the base year when compared to existing counts resulted in spot adjustments throughout the study area in both the “With” and “Without Project” scenarios.” (Appendix C, 2015 Traffic Impact Study, Chapter 4, p. 24).

<p>G-64 (cont'd)</p>	<p>↑</p> <ul style="list-style-type: none"> ○ Why should any results of this model be trusted if the model already showed obvious poor performance in some predictions that required post-model adjustments? How can one affirm that the model predictions that are not obviously wrong are accurate? ○ What were the known and proposed development projects that were included in the model? ○ Are there any projects that weren't included?
<p>G-65</p>	<ul style="list-style-type: none"> • Near-Term 2017 baseline traffic conditions inaccurate: The Recirculated DEIR states "It is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented." (Recirculated DEIR, 5.2) There are multiple major developments planned for the area (refer to Recirculated DEIR, Table 6.1) that can significantly impact the amount of traffic in Mission Valley, how can the report estimate a baseline into the future when traffic conditions are rapidly changing and authors don't know when the road would be built? • Appendix C Traffic Impact Study for the Serra Mesa Community Plan Amendment Roadway Connection Project dated January 2017 differs from the Appendix C Franklin Ridge Road Connection Traffic Impact Study, dated January 2015. For example, in Appendix C (2017), p. 79; and in Appendix C (2015), refer to p. 54. Both of these tables are titled Significant Impact Comparison – Long Term (2035) vs. Existing Conditions (2012) and have the same header and footer (except for the page number) but some of the information on the page is different. The 2017 traffic analysis was conducted by a different company. There isn't any indicator on this page that this information was changed by another company. Has any significant data been changed? Also, the first company has a professional seal on their Traffic Impact Study. There isn't a seal for the second company. Discuss the significance of a seal and the lack of a seal.
<p>G-66</p>	<ul style="list-style-type: none"> • How does this data compare to what was predicted for the Quarry Falls Project, Phase 1?
<p>G-67</p>	<ul style="list-style-type: none"> • When the data was collected for the Traffic Impact Study did it consider the activities of City View Church? If not, will they be included? If no, provide an explanation for the exclusion.
<p>G-68</p>	<ul style="list-style-type: none"> • Was the future school on Via Alta considered in the studies and analyses? Children will be crossing the roadway with close to 35,000 cars per day. What will be the impacts? How will impacts be avoided?
<p>G-69</p>	<ul style="list-style-type: none"> • Methods and Assumptions – <ul style="list-style-type: none"> ○ Phase 1 of SR-163 and Friars Road Interchange Project is scheduled for construction in 2017. SR-163 provides access to I-805 and is promoted on the City's website as "This project will alleviate some of the severe traffic delays along Friars Road due to new development in Mission Valley." Will this information be added and studied? If not, provide an explanation for why SR-163 with the improvements wasn't studied or discussed. ○ "...the cumulative impact analysis evaluates the long-term cumulative impacts projected to occur when the Serra Mesa Community Plan reaches full planned buildout, which is anticipated to occur by the year 2035." (5.2-18) Serra Mesa is impacted by all of the development in Mission Valley. What would be the results if the cumulative impact analysis included the long-term cumulative impacts projected to occur when the Mission Valley Community Plan reaches full planned buildout?
<p>G-70</p>	<ul style="list-style-type: none"> • Why wasn't the intersection of Mission Center Road and Sevan (located in Serra Mesa) included in the Traffic Impact Study? This intersection is the entrance into the Hye Park condominium complex, which includes no protected left turns from Sevan Court to Mission Center and no protected left turns from Mission Center to Sevan Court. There is no traffic signal at this intersection for turning during peak traffic hours. Will this intersection and the traffic impacts be studied and added to the traffic analysis? If not, provide an explanation for the exclusion.

G-71	<ul style="list-style-type: none"> The freeway off-ramps weren't analyzed in the Traffic Impact Study. Provide an explanation for their exclusion.
G-72	<ul style="list-style-type: none"> Sandrock Road became a two lane collector with a continuous center lane in 2014. Do the near-term conditions account for the change of Sandrock from four to two lanes? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
G-73	<ul style="list-style-type: none"> Broadstone Corsair, a 360 unit multifamily housing project, located at the corner of Aero and Sandrock, opened in 2015. Was the traffic from this project factored into near-term and long term conditions? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
G-74	<ul style="list-style-type: none"> The previous DPEIR included the roadway segment of Friars Road between River Run and Fenton Parkway. Explain why this segment has been removed from this Recirculated DEIR. (5.2.1.1)
G-75	<ul style="list-style-type: none"> Civita has constructed over 1,600 units. Was an assessment or survey made of the traffic patterns and activity of residents within Civita? If yes, what were the results? If not, provide an explanation for the exclusion.
G-76	<ul style="list-style-type: none"> Traffic generated by events at Qualcomm Stadium during event time wasn't included in the studies. Will it be included? If not, provide an explanation for the exclusion.
G-77	<ul style="list-style-type: none"> The Aquatera Drive to Murray Ridge Road segment of Mission Center Road is listed as a 2-lane Collector with no fronting property. Hye Park is a 103 unit condominium complex facing Mission Center Road at Sevan Court between Aquatera and Murray Ridge. Will the information on the table and everywhere else be corrected? If not, provide an explanation for the exclusion.
G-78	<ul style="list-style-type: none"> In Appendix G of Appendix C Traffic Impact Study, there are charts labeled "51:Via Alta &" but there aren't any charts labeled with "Via Alta & Franklin" for 2035 with/Project. Where is the data that has been used for the analysis of Via Alta & Franklin?
G-79	<ul style="list-style-type: none"> Were the improvements/mitigations that are required for the approved Mission Valley projects included in the traffic analysis? If not, what would be the impact of these improvements/mitigations on the traffic analysis?
G-80	<ul style="list-style-type: none"> This Traffic Impact Study has not studied as many road segments and intersections as in Final PEIR for the Quarry Falls Project, which studied the road connection as an alternative at that time. Provide an explanation for the difference in limiting the road study perimeters.

Data Analysis

G-81	<ul style="list-style-type: none"> Do the delays at the I-805 NB and SB ramps (PM) mean there will be queuing that will extend into the residential streets? Will queuing be discussed? If not, provide an explanation for the exclusion?
G-82	<ul style="list-style-type: none"> I-805 NB Ramp <ul style="list-style-type: none"> The ramp meter data on Table 5.2-18 doesn't include Murray Ridge I-805 NB Ramp (PM). However, it includes the I-805 SB Ramp (PM) 31 minutes delay In the KOA Corporation study the I-805 NB Ramp (PM) is displayed as 43 minutes delay. Explain why this data wasn't included in the analysis. Table 7-4, Appendix C, Long-Term (2035) with the Connection – The data for I-805 NB ramp at Murray Ridge Road shows 43 minutes of delay (PM) and the I-805 SB ramp at Murray Ridge Road shows 31 minutes of delay (PM). Currently, in the PM there is a bigger delay at the SB ramp rather than the NB ramp. Provide an explanation.

- G-83
- For intersections with connection long-term “Franklin Ridge Road/Phyllis Place – LOS F (PM)” stated on page 60 of the KOA Corporation Traffic Impact Study contradicts Table 4-2 of the Chen Ryan study which indicates the LOS is B. Explain the contradiction.
- G-84
- Inaccurate LOS in Table 5.2-8: According to Table 5.2-7 any V/C in the 0.9-1.00 range is designated LOS E (unacceptable). However, Table 5.2-8 cites LOS D (acceptable) on 3 of those entries: (1) Mesa College Dr on-ramp to SR-163 AM, V/C = 0.916, (2) SR-163 to Mesa College Dr on-ramp PM, V/C = 0.909 and (3) Murray Ridge Rd to I-8 PM, V/C = 0.903. While this LOS table is used only as a reference other LOS tables are not. Will this and similar mistakes in all LOS tables be corrected?
- G-85
- Inaccurate LOS in Table 5.2.10: Phyllis Place between Abbotshill Road and Franklin Ridge Road is shown as LOS A in the Near-Term with Project, but it should be LOS F. Residents leaving the Abbotshill area will drive this segment and meet the next segment (Phyllis Place between Franklin Ridge Road and I-805 SB ramp) that has LOS F. With the next segment being congested cars will start lining up west on Phyllis Place back into the Abbotshill area, so Phyllis Place between Abbotshill Road and Franklin Ridge Road will effectively become an LOS F. Since Phyllis Place is the only road to exit the Abbotshill area, this creates a significant traffic hazard for that neighborhood. Will the LOS of Phyllis Pl between Abbotshill Rd and Franklin Ridge Rd be adjusted to show the actual expected level of service? If not, provide an explanation.
- G-86
- Section 3.3.1.2 of the DEIR states that the proposed intersection will be a signalized intersection. What is omitted is if the signal will have a pedestrian capability. It might be assumed that it does since it has crosswalks. The addition of crosswalk signaling on the traffic flow is not analyzed although it seems to be implied. The distance between the proposed intersection with Phyllis Place and the signal light at the I-805 SB ramp (the west end of the bridge) is about 650 feet. This distance is less than the worst case queue length of 3,112 feet as listed in Table 5.2-12. This can effectively lock out Phyllis Place residents from getting on to the I-805 SB ramp unless the lights are synchronized and there is a "No Right Turn on Red" implemented at the light to prevent keeping the queue full from cars coming up through the Franklin Ridge Rd connector. Will this be addressed in the traffic analysis? If not, provide an explanation for the exclusion?

Vehicles Miles Traveled Data (VMT)

- G-87
- Project Influence Area
 - Explain how Traffic Analysis Zones are determined. Is the increase or decrease in ADTs on freeway mainline segments, roadway segments, and/or freeway ramps considered?
 - According to Appendix H (p. 3 of 8) SANDAG Series 12 ADT was used to determine the project influence area by comparing the Year 2035 with Project conditions to Year 2035 without Project conditions. Incorrect information in the SANDAG Series 12 Data, Forecast Year 2035 at the Transportation Forecast Information Center includes:
 - Sandrock Road is classified as 4 lanes but was restriped as two lanes.
 - Murray Ridge Road is classified as 4 lanes but was restriped as two lanes.
 - Franklin Ridge Road south of the Via Alta/Franklin Ridge intersection isn't included.
 - Franklin Ridge Road segment between Phyllis Place and Via Alta (street name is misidentified as Murray Ridge), which isn't approved, is shown; inclusion of a road can't be based on information from a community plan because the extension of Tierrasanta Boulevard (shown in their community plan) isn't shown on the map.
- Why does SANDAG have inaccurate information? Explain why the unapproved Franklin Ridge roadway connection has been included in the data, but not the Franklin Ridge Road section from the Via Alta intersection to Civita Boulevard?*

G-87
(cont'd)

Was the above inaccurate information used for the VMT analysis? If affirmative, what would be the impact of the corrected information on the VMT analysis?

- If it includes roadway segments, the project influence area doesn't include all of the roadway segments in Serra Mesa which would increase or decrease by more than 500 ADTs that are identified in the Traffic Impact Study.
 - Explain the inconsistency in the data.
 - Will the VMT study be rerun to include the excluded roadway segments and the evaluation included in this Recirculated DEIR? If not, why not?
- The Project Influence Area doesn't include the same area that was studied in the Traffic Impact Study (e.g., excluded Qualcomm Stadium area). Discuss the inconsistency between the data used for the Traffic Impact Study and the data used for the VMT study.

- Table 1 (Appendix H)
 - Data is provided for 2013, Near Term (2017), and Long Term (2035). How was the data obtained for 2013, 2017, and 2035?
 - If the 2013 data was used for a baseline, does the 2017 data include the development that has occurred since 2013?
 - If the 2013 data was used for a baseline, does the 2035 include all of the proposed and/or approved Mission Valley developments?
- The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, "Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, *typically induces additional vehicle travel*. For the types of projects indicated previously as likely to lead to additional vehicle travel, an estimate should be made of the change in VMT resulting from the project." (p. III.32, emphasis added)
 - Based on the above, why does the Recirculated DEIR suggest that the proposed road connection will decrease VMT from its baseline level?

G-88

- What was the basis for the "Baseline" VMT fed into the CARB's EMFAC model output as shown by Table 5.10-4 in the Recirculated DEIR? What relevance does that number have to the known VMT levels in the regions affected by the proposed road connection?

G-89

- On what basis -- other than the programming of the EMFAC model -- is the proposed road connection expected to reduce (rather than increase) VMT in affected regions? What verified and validated estimates of either baseline VMT or expected extent of changes in VMT (if any) are available?

G-90

- Induced VMT
Proposed project contradicts Senate Bill No. 743: The project's new road and the mitigations proposed in this Recirculated DEIR will only partially help traffic flow in the short term. "Ironically, even "congestion relief" projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions." (Updating Transportation Impacts Analysis in the CEQA Guidelines, Senate Bill No. 743, p. 5)

Discuss the contradiction between Senate Bill No. 743 and the roadway connection.

Discuss how the roadway connection will provide a sustainable solution to the traffic issues currently suffered by Mission Valley and additionally new ones in Serra Mesa.

G-91

The Recirculated DEIR states “By providing a new roadway connection, the project may affect future vehicle circulation on local roadways and freeways, as motor vehicle would reroute their future trips based on the new roadway connection. As such, the new roadway connection would introduce new trips to the project area that currently use an alternative route, thereby affecting, and potentially reducing, traffic volumes on existing surrounding roadways.” (5.10.3.2)

Serra Mesa is known as a pass through community – people use Serra Mesa roadways to reach other areas (e.g., Kearny Mesa, I-805, Mission Valley). Here are a few examples:

- Since there isn’t access to I-805 N from the hospital complex in the Birdland area, there are employees who travel on I-805 S, exit at Murray Ridge, go across the bridge on Phyllis Place in Serra Mesa, and access I-805 N.
- People employed at the state building on Metropolitan Drive in Mission Valley access I-805 via Mission Center Road, Murray Ridge Road, and Phyllis Place or I-15 or Kearny Mesa via Mission Center Road, Murray Ridge Road, and other local streets (multiple routes available).
- People traveling to stadium events use I-805, exit Murray Ridge, and travel the other local streets (multiple routes available) in Serra Mesa to reach the stadium.
- To avoid Friars Road congestion people travel Mission Center Road and the local streets in Serra Mesa to reach their destination (e.g., I-805, Kearny Mesa, I-15, Tierrasanta, etc.).

The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA states that

- “With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT...” (p. III:28) The changes which are applicable to the roadway connection include longer trips and route changes. Refer to the Texas Street example under Impacts in this letter.
- “Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that results from vehicle travel.” (p. III:34)

The roadway connection could potentially result in Induced VMT. Refer to Appendix H: E/E VMT wasn’t included in the total VMT.

G-92

Discuss the impact on VMT if vehicles drive north from Mission Valley via the Franklin Ridge roadway connection to access I-805 SB. Will these vehicles add more miles to their trip than without a roadway connection?

In relationship to the discussion in this VMT section:

- Does E/E VMT refer to Induced VMT?
- If not, was an analysis made of Induced VMT?
- If affirmative, what method was used?
- If not, what would the result be if induced VMT were included?
- Considering the discussion and evidence for including Induced VMT, will it be included in this Recirculated DEIR? If it won’t be included, provide an explanation for the exclusion.

Mitigations

G-93

The statements in this section use the phrase “shall be”. If this document is certified by the City Council, will the description of the road changes that occur after the phrase “shall be” be required to be implemented? If not, will a clarifying statement be included that describes the process for implementation?

G-94	These mitigations have for the most part the same description: MM-TRAF-1 and 9; 2 and 10; 3 and 11; 4 and 12; 5 and 15; 6 and 16. Why are there different mitigation designations for the same mitigation description? It's confusing!
G-95	MM-TRAF-1 and MM-TRAF-9, Murray Ridge Road from Mission Center Road to Pinecrest Avenue, was addressed and resolved in the Final PEIR for the Quarry Falls Project, certified by the City Council. Explain why it's appropriate to reintroduce this mitigation.
G-96	In 5.2.4.3 and 6.3.2.5 the mitigation for MM-TRAF-3, Phyllis Place from Franklin Ridge to I-805 SB ramps, states Phyllis Place shall be widened. This differs from the statement MM-TRAF-11, Phyllis Place from Franklin Ridge to I-805 SB ramps, which states that Phyllis Place shall be reconfigured. There's a contradiction. Which is the correct statement? If reconfigured is being proposed, discuss the width of the road.
G-97	MM-TRAF-4 and MM-TRAF-12 indicates that "Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. The new classification for this segment of Phyllis Place will be a four-lane Collector." (p. 5.2-27 and p. 5.2-40, respectively) However in the Executive Summary section MM-TRAF-4 and MM-TRAF-12 are each classified as a Major Arterial (p. S-6 and S-9, respectively). Will the discrepancy be corrected?
G-98	MM-TRAF-5 and MM-TRAF-15 lack a specific description of the proposed restriping and widening of the NB on-ramp approach. Provide a detailed description.
G-99	MM-TRAF-6 and MM-TRAF-16 lack a specific description of the widening of approaches. Provide a detailed description of the SB ramps.
G-100	Table 10-8 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan With Phyllis Place Road Connection: <ul style="list-style-type: none"> • Which mitigation(s) in the Recirculated DEIR are ones that are not listed in Table 10-8? • Are there mitigations listed in Table 10-8 but not considered in the Recirculated DEIR that would impact traffic congestion? Were these traffic improvements considered in the traffic impact analysis? If not, provide an explanation for not including them in the analysis.
	Table 11-1 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (without roadway connection): <ul style="list-style-type: none"> • Which mitigations won't be completed and/or be the responsibility of the developer if the roadway connection is approved? • When the traffic analysis was conducted did it include the identified mitigations that won't be completed and/or be the responsibility of the developer? If it included them, what would be the impact on the analysis if they were excluded?

Impacts

G-101	The City Council Resolution 304295 (October 2008) for the Quarry Falls Project includes this statement: "Encourage the use of public transit modes to reduce dependency on the automobile." (p. 3 of 28) How does a roadway connection whose main purpose is to provide access to I-805 fulfill the finding to reduce dependency on the automobile?
G-102	↓ The statement is made that "...and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley, that would improve access in the area."

G-102 (cont'd)	<p>↑</p> <ul style="list-style-type: none"> It isn't mentioned that Mission Center Road provides a direct link with Serra Mesa and Mission Valley. Will that statement be added? If not, provide an explanation for the exclusion. The studies indicate that there will be added traffic in Serra Mesa. Explain how efficiency and accessibility would improve with the added traffic. This Recirculated DEIR has identified traffic impacts during peak hours that will essentially divide the community by making it very difficult for residents of the Phyllis Place area to easily access other parts of Serra Mesa. Will this impact be discussed? If not, include an explanation for the exclusion.
G-103	<p>Surrounding Serra Mesa streets will be impacted when there's traffic congestion. Alternative routes weren't studied: Raejean and Greyling Drive for Murray Ridge Road and Afton for Sandrock. Will an analysis be conducted and included? If not, provide an explanation for the exclusion.</p>
G-104	<p>The data indicates with the roadway project that the delay at the Mission Center/Murray Ridge intersection will improve and the ADTs for the segment of Mission Center Road from Aquatera Driveway to Murray Ridge will decrease (the LOS remains F without and with the project). The data didn't consider the required improvement to Mission Center Road from I-805 to Murry Ridge Road that's described in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (p. 11-5), if the roadway connection is not approved.</p>
G-105	<ul style="list-style-type: none"> In the Recirculated DEIR it's indicated that the mitigation measure to widen Mission Center Road from Aquatera Driveway to Murray Ridge Road is unlikely and the impact considered significant and unavoidable. Was a structural evaluation made by either a City engineer and/or by Caltrans to assess the feasibility of the widening of the Mission Center Road in the area of the I-805 bridge? If not, provide an explanation for the exclusion. If the evaluation was conducted, provide the documentation from the engineer. The mitigation for widening Mission Center Road between the I-805 bridge and Murray Ridge Road was not deemed unlikely in the Final PEIR for the Quarry Falls Project.
G-106	<ul style="list-style-type: none"> How much MHPA area would be impacted by the widening of Mission Center Road from I-805 to Murray Ridge? There wasn't any discussion of an impact on MPHA for the Mission Center Road widening in the Final PEIR for the Quarry Falls Project. If it is feasible to widen Mission Center Road, what would be the LOS condition for the Murray Ridge/Mission Center intersection without the roadway connection but with the improvements? If this data isn't included, provide an explanation for the exclusion.
G-107	<p>The impacts of each of the mitigations have not been studied. Will mitigation impacts be studied? Here are some examples:</p> <ul style="list-style-type: none"> Discuss the impacts of widening the NB on-ramp (MM-TRAF-15) and the widening of the EB approach, SB on-ramp, SB off-ramp (MM-TRAF-16).
G-108	<ul style="list-style-type: none"> There isn't any discussion on the impact of the roadway connection on existing parking spaces. A 1.3 acre park without a parking lot will be constructed next to the roadway connection and Phyllis Place. The only available parking is street parking. The park guidelines indicate "No on-site parking, except for disabled access." Will the parking spaces adjacent to the park be removed? If affirmative, discuss the parking impact, especially for disabled access.
G-109	<ul style="list-style-type: none"> Bikes <ul style="list-style-type: none"> If the roadway connection is approved and implemented, existing Class II bike lanes on Serra Mesa streets could be impacted. Will a discussion of the impact on existing Class II bike lanes be included in this section? If it is not added, provide an explanation for its exclusion. There are mitigation measures that require the removal of bike lanes (e.g., Murray Ridge Road). If any of these mitigation measures were approved, provide a discussion of compliance with the Bicycle Master Plan.

G-110	<ul style="list-style-type: none"> It's indicated that Phyllis Place from the I-805 SB ramp to the I-805 NB ramp "shall be restriped to accommodate a total of five lanes." (Refer to Addendum, p. 11-12) <ul style="list-style-type: none"> The California Log of Bridges on State Highways, p. 52 of 71, indicates that the width (referring to out-to-out width) of the bridge is 24.4 m (80.05 feet). What is the width from curb to curb of the bridge? Will there be bike lanes on the bridge? According to the City's Street Design Manual, p.45, a four lane major street with bike lanes and center median requires 76 foot curb-to-curb. What would be the width of 5 total lanes? What would be the width of 5 total lanes and bicycle lanes? The state's Highway Design Manual indicates that "The minimum width of a bridge sidewalk shall be 6 feet." (p. 200-41) Will the design include 6 feet sidewalks on both sides of the overcrossing? Provide a diagram showing the bridge 5 lane configuration. If not, provide an explanation for the exclusion. Will the overcrossing meet the required state highway design manual? If not, explain any design exceptions. Since the bridge will be restriped to add additional lanes has an analysis been conducted to determine the capability of the I-805 bridge to withstand the added stresses of maximum tonnage of cars queuing and their engines vibrating on the bridge at peak times been done? If not, provide an explanation for the exclusion. Will the reconfigured road meet the City's design standards? If there are any exceptions, what are they?
G-111	<ul style="list-style-type: none"> In the Final PEIR for the Quarry Falls Project Transportation Phasing Plan, #8b Murray Ridge Road Bridge over I-805, it states "Prior to the issuance of any building permits for Phase 1, the applicant shall assure by permit and bond the restriping of Murray Ridge Road/Phyllis Place, between the northbound and southbound ramps to I-805 ramps, to 5 lanes, satisfactory to the City Engineer." (p. 11-4) The Murray Ridge Bridge, as viewed in the p. 10 of the Addendum, shows 4 lanes and Civita (Quarry Falls) has been issued building permits. <ul style="list-style-type: none"> Provide an explanation for the non-implementation of this improvement. If implementation isn't possible for any reason, will this item be removed as a mitigation measure? If it is removed, discuss the impact of the removal on the analysis?
G-112	<ul style="list-style-type: none"> The City has embraced Vision Zero: No loss of life is acceptable. One of the focuses is engineering safe street design. <ul style="list-style-type: none"> With the roadway connection ADTs will increase from 10,770 (existing) to 24,037 (long term) and ramps will be widened. Discuss this impact of increased traffic and widened ramps on pedestrian safety and in relationship to Vision Zero. Without the roadway connection ADTs will increase from 10,770 (existing) to 14,570 (long term). Will there be less of an impact on pedestrian safety with the connection versus without the connection?
G-113	<ul style="list-style-type: none"> The statement is made "...Phyllis Place shall be widened from Franklin Ridge to I-805 SB to accommodate 5 total lanes..." and that it would be designated as a five lane major arterial. What is a major arterial? Is it the same thing as a primary arterial? The street design manual describes six lane primary arterials and four lane major roads.

G-114

- How wide is a 5 lane major arterial? Provide the physical dimensions for Phyllis Place. Phyllis Place is not wide enough (approximately 40 feet wide) to reconfigure to 5 lanes.
- How many feet need to be added to make this a major arterial?
- Would bike lanes be added?
- Would sidewalks be added?
- Include a cross-section of the 5 lane design.
- Discuss the impacts of widening. Would widening Phyllis Place impact the approved park?
- There are two curves – one located west of the City View Church’s western driveway to the single family residences and one located east of the City View Church’s eastern driveway to I-805 ramps. It’s mentioned in sections 3.3.1.2 and 5.2.6.1 that there’s a “slight curve along Phyllis Place from the I-805 ramps”. This curve is not slight. What is the radius of each of the curves? (Refer to Addendum, p. 8)

G-115

- A roadway connection increases the ADTs on Phyllis Place to 34,540 (2035).
 - This applies if Phyllis Place will be designated as a primary arterial. According to the Street Design Manual a primary arterial is described as “A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movement. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property.” (p. 126) Also, it’s stated that “Should a lot have frontage only on a primary arterial, driveway access limited only to right turns in and out will be permitted at locations and under conditions specified by the City Engineer and may require an additional lane. (p. 122)
 - If either bike lanes or sidewalks aren’t being added to Phyllis Place, discuss how this mitigation would fulfill the project objectives and meet the description of a primary arterial?
 - City View Church is an abutting property with access. Discuss the contradiction with the description of a primary arterial.
 - Will vehicles exiting City View Church be required to make a right turn only? If so, this will greatly impact the residential area located west of Phyllis Place unless the vehicles are allowed to make a U-turn at the Franklin Ridge/Phyllis Place intersection.

G-116

- Discuss this mitigation in regards to meeting the project objectives:
 - “Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.” Given the blind curve and downhill travel of westbound vehicles from the I-805 southbound off-ramp, discuss how a safe transportation system will be created on Phyllis Place when the ADTs increase from 2,420 (existing) to 34,540 (2035).
 - If bike lanes and sidewalks are not being included, provide a discussion regarding “Improve local mobility...”
- “...the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient.” (5.2.6.1) In reference to MM-TRAF-19, relocating the City View Church driveway, “...this analysis assumes that the mitigation measure would not be implemented.” (8. 1.1)

G-116 (cont'd) ↑

- If MM-TRAF-19 isn't implemented, would the project meet the project objective to "Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts."?
- Since MM-TRAF-19 is located on private property discuss the procedure for and cost of implementing the mitigation.

Will the above items be added to the Recirculated DEIR and discussed in the appropriate area? If not, provide an explanation for the exclusion.

G-117 | A dog park is located at the top of Via Alta. Will it be a safe place to walk dogs and cross the street with close to 21,000 cars a day?

G-118 | If the proposed Franklin Ridge access road was extant, vehicles traveling from North Park and University Heights to I-805 will probably choose the Franklin Ridge Road route. It's shorter than alternate routes by 1 mile, it's direct, and there's no access from Texas and Qualcomm to the I-805 entrance. The adjacent image is extracted from the Final PEIR for the Quarry Falls Project, Figure 3.3.



Will the traffic from the Texas Street area be included in the study and the impact considered? If not, provide an explanation for the exclusion.

The following table shows an analysis made of the impact of the connector street on Raejean Avenue - East refers to heading towards Greyling Drive and West is heading towards Murray Ridge Road.

G-119

Time	2035 Peak Flow in Vehicles/Hour		
	Connector	W/out Connector	Diff (With-W/out)
East AM	100	95	+5
West AM	190	185	+5
East PM	210	205	+5
West PM	150	145	+5

There's an increase in traffic flow with the connector. The data supports the need for more analysis of alternative routes in Serra Mesa. Will this analysis be included or additional traffic studies be conducted and discussed in the pertinent areas of the Recirculated DEIR (e.g., impacts)? If not, provide an explanation for the exclusion.

G-120 | For each of the mitigation measures, indicate who will be the responsible party – cost and implementation.

The state CEQA Guidelines define feasibility as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." (p. 5.3) Of the 19 mitigation measures listed:

- G-121 ↓
- 8 of the measures (MM-TRAF-1, TRAF-2, TRAF-8, TAF-9, TRAF-10, TRAF-13, TRAF-14, TRAF-19) include this statement: "Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable." In six of these mitigations the footnote in Table ES-1 indicates that these mitigations would conflict with the City's land use and mobility policies. Consequently, the statement implies that these mitigations may never be completed.

<p>G-121 (cont'd)</p>	<p>The information that is listed under these 6 mitigations does not include the complete statement that is listed in very small print in the Table ES-1 footnotes, p. 31-32. For example, “Implementation of this measure would reduce the impact to a level below significance; however, the City’s ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City’s General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.” The cited statement explains what is meant by countervailing considerations and why implementation is unlikely. While Footnote 2, 3, and 4 are worded a little differently, the same is true for them. <i>The entire statement from the footnote should be included in the description for each of these 8 mitigations. If it isn’t included, provide an explanation.</i></p> <ul style="list-style-type: none"> • 6 of the measures describe at least one street/ramp that needs widening (MM-TRAF-3, TRAF-5, TRAF-6, TRAF-7, TRAF-15, TRAF-16) Any widening project will be costly and may never be completed. • 1 of the measures (MM-TRAF-18) requires a fair share contribution for an additional ramp lane, probably costly. • 3 of the measures (MM-TRAF-4, TRAF-11, TRAF-12) are restriping projects and could be more easily completed. • 2 of the measures (MM-TRAF 15 and TRAF-16) provide only partial mitigation; these mitigations are listed as Significant and Unavoidable. <p><i>Consequently, 8 of the measures may never be completed. 7 measures are going to be costly. 3 out of the 19 could be completed, and 10 of the measures are listed as Significant and Unavoidable. Will a chart analyzing the feasibility of the mitigations be included?</i></p>
<p>G-122</p>	<p>The following statement is used with eight of the mitigations: “Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.” Does this mean that these eight mitigations weren’t used in determining the data for “with project with mitigations” charts? If the mitigations were included, will another chart be added that shows “with project with feasible mitigations”?</p>
<p>G-123</p>	<p>The statement regarding necessary emergency access points (p. 5.1-19) contradicts the following statement: “There is limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple access or egress routes.” (p. 5.2-48) Explain the contradiction.</p>
<p>G-124</p>	<p>The Climate Action Plan discusses reduction in GHG emissions from transportation and expanding alternative transportation choices. A bicycle and pedestrian access exists at Kaplan and at least one trail is required to be constructed with bicycle and pedestrian access. Discuss the roadway connection in relationship to the Climate Action Plan.</p>
<p>G-125</p>	<p>Currently, numerous vehicles of residents of Civita create parking problems by encroaching and using up already limited space for the local residents. The roads impacted are: Ainsley Road, Ainsley Court, Polizzi Place, Kaplan Drive, Harton Road and Harton Place. The possible reasons are Civita residents using their garages for storage, convenience or easier to park on the street rather than parking on their project streets, too many vehicles with insufficient parking within Civita, and/or vehicles too large for their garage. A roadway connection will make it easier for people to park on the streets in Serra Mesa. This item wasn’t discussed. Will parking on Serra Mesa streets be impacted? If affirmative, will parking impacts be studied? If not, provide an explanation for the exclusion.</p>

“Would the project substantially alter present circulation movements include effects on existing public access to beaches, parks, or other open space areas?” (5.2.7.2) The roadway connection has the potential for altering circulation movement by encouraging vehicles to travel through Serra Mesa for access to I-805 and Kearny Mesa. Discuss the change in circulation.

Community Access – Two reference points were selected (one at the top of the north end of the connection and the other at the south end between Friars and Qualcomm Way). The times for each of these points to the amenity were averaged.

- What would be the impact if the results weren’t averaged? Will this information be added? If it is not added, provide an explanation for its exclusion.
- Why isn’t the data being presented individually for each community – Serra Mesa and Mission Valley?
- Where is the data that was averaged? These times do not seem possible and do not make sense. Explain where and how the data was collected and analyzed.

G-126

Community Access – Refer to Appendix J of Appendix C

- If the freeway and surface columns are intended to add up to equal the distance column, the data is incorrect for the Point A table; and wrong in one row in the Point B table. Will this information be corrected? If not, provide an explanation.
- What is the logic behind averaging the time between two points for the hospitals, fire stations, schools, and library, and shopping centers and then summing them? For example - Why not use one representative hospital, e.g., Sharp Hospital? Why would the closest facility not be analyzed? Why is it pertinent to get to the farthest facility from a location? Provide documentation that this is a valid method for analyzing accessibility. If this is not a valid method, will the analysis be redone and included? If not, provide an explanation for the exclusion.
- Is there a fire station planned for Civita (reference San Diego Future Quarry Falls)?
- The data doesn’t appear to take into account the freeway impacts in Serra Mesa if the roadway connection was approved. The freeway data didn’t change in the tables. If the impacted freeways were considered, what would be the data? Would it take longer to get to facilities with traffic even when the facility is closer by distance?

G-127

In Appendix C, Traffic Impact Analysis, Chapter 8, Bus Service, p. 71, it was stated that “In the future MTS could take advantage of a new road connection using Franklin Ridge Road to introduce bus service between Mission Valley and Serra Mesa via that route. However, in earlier discussions no commitment was made about actually providing such service or changing the route structure to accommodate that.” Will the second line of the statement about MTS’s non-commitment be added to section 5.2.8.3? If not, provide an explanation for the exclusion.

Air Quality

G-128

The Air Quality Report uses the baseline weather data from Lindbergh Field, located about 8 miles from the site of the roadway connection. However, the National Weather Service, also, maintains observations at Montgomery-Gibbs Executive Airport, located about 1.5 miles away and in the same wind flow patterns. Will the report be updated using the data from Montgomery-Gibbs Executive Airport for the analysis? If not, provide an explanation for the exclusion.

G-129	Can a baseline sampling be conducted at key areas (e.g., Franklin Ridge Road segment, City View Church, Faith Community Church, Hye Park, corner of Murray Ridge/Mission Center)? If not, provide an explanation for rejecting the request.
G-130	<p>The ADTs on Phyllis Place will increase from 2,420 (existing) to 34,540 (2035). The construction of the roadway connection would concentrate vehicle trips in a specific area on a steep street.</p> <ul style="list-style-type: none"> What is the maximum grade of the roadway connection? Would the grade of the street impact air pollution? If the grade will impact air pollution, will it be discussed, studied, and added? If it won't, provide an explanation for the exclusion.
G-131	<ul style="list-style-type: none"> Would emissions collect at Phyllis Place (e.g., winds blowing up the hill), located across from retirement/Senior units? If there's a possibility of emissions collecting, will it be discussed, studied, and added? If it won't, provide an explanation for the exclusion.
G-132	<p>Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway connection with a steep grade.</p> <ul style="list-style-type: none"> Was an air pollution analysis of this area conducted? If this information won't be included, provide an explanation for the exclusion.
G-133	<ul style="list-style-type: none"> Can tractors, trailers, and buses be restricted from the roadway connection? <p>The sensitive receptors are 56 retirement/Senior units located approximately 300 feet from the roadway connection, a public park to be constructed next to the roadway connection, and Elevate Elementary School at Faith Community Church. (Refer to Addendum, p. 9) Additionally, there may be a school at Via Alta. The Significance Determination Thresholds states that "If sensitive receptors are involved, the more restrictive of the guidelines should be applied." (p. 7)</p>
G-134	<ul style="list-style-type: none"> Was an analysis of the respirable particulate matter and fine particulate matter made for each of the sites? If affirmative, will this information be included? If not, provide an explanation for the exclusion.
G-135	<ul style="list-style-type: none"> Will a hotspot analysis be conducted? If not, give an explanation for its exclusion.
G-136	<p>This section indicates that the proposed CPA for a roadway connection would not include trip-generating uses but 4,780 residential units and 900,000 s.f. of commercial and office are being built at Civita, and it will redistribute traffic from Mission Valley to Serra Mesa. CPA which is specific to Serra Mesa creates additional traffic in Serra Mesa. The analyses show that the number of trips will increase at specific roadway segments and intersections. Will the air quality impacts for Serra Mesa from trip generating redistribution be included in this section?</p>
G-137	<p>The construction of the roadway connection would concentrate vehicle trips in a specific area. The Traffic Impact Study indicates there will be significant delays causing queuing in the vicinity of the I-805 ramps. Was the pollution from this queuing and the impacts on this area studied? If not, give an explanation for the exclusion.</p>
G-138	<p>There's a school and preschool located at Faith Community Church. Was an analysis of the impact of the air pollution caused by queuing and the atmospheric conditions (i.e., winds blowing west to east) on the school and preschool made? If not, provide an explanation for not conducting an analysis.</p>
G-139	<p>The site for the roadway connection was not approved for Quarry Falls. Provide an explanation for assuming that "vehicle trip generation and roadway construction for this specific site has been anticipated in the RAQs."</p>

- G-140 | The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor. Mission Center Road from Aquatera to Murray Ridge Road segment will change from LOS E (existing) to LOS F (2035) with and without the connection. Will an analysis of this roadway segment be added? If not, provide an explanation for the exclusion.
- G-141 | Hye Park, 103 multifamily residential units, is located within Serra Mesa at Sevan Court adjacent to Mission Center Road. The complex is at the bottom of a deep ravine that can block air circulation. The ADTs will increase on Mission Center Road from Aquatera Drive to Murray Ridge Road from 9,035 (existing) to 13,064 (2035) with the connection and 23,850 (2035) without the connection. Would emissions collect in the Hye Park area? If there's a possibility of emissions collecting, will it be studied, discussed, and added? If it won't, provide an explanation for the exclusion.
- G-142 | If it's determined that any of the Traffic Impact Study needs revising and/or new traffic studies are conducted, would this impact the air quality analysis? If affirmative, which areas?
- G-143 | The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. Will the replacement of plant material with a hard surface have any impact on air quality?

Noise

- Study and Site Selection
- G-144 |
- There were more noise measurements made in Mission Valley than in Serra Mesa. Why wasn't a measurement made in the residential area at the western end of Phyllis Place?
- G-145 |
- The residential area near the corner of Mission Center Road and Murray Ridge Road has a steep slope and a lot of traffic. Will this corner be added to the study? If not, provide an explanation for the exclusion.
- G-146 |
- Why were sites R1 and R8 selected for the noise study? These two areas are located in Mission Valley and aren't connected to Civita. Will the additional sites in Serra Mesa that are significantly impacted by the roadway connection as shown by the Traffic Impact Study – along Murray Ridge Road and Sandrock Road be added to the noise study? If not, provide an explanation for the exclusion.
- G-147 |
- Include the maximum measurements of noise and their frequency or provide a reason for their exclusion.
- G-148 |
- Provide the standard deviation for the noise measurements or a reason for their exclusion.
- G-149 |
- Noise was analyzed using the data from the Traffic Impact Study. If the Traffic Impact Study data is inaccurate, will the noise study be redone?
- G-150 | The ADTs for Franklin Ridge Road/Phyllis Place will increase from 2,420 (existing) to 34,540 (long term) with a LOS F (PM).
- The long term impacts with the roadway connection and without the roadway connection show a change of either 0 or 1dB in the residential areas of Murray Ridge Road and Phyllis Place and at City View Church even though the ADTs will increase tremendously at each of those areas. Provide an explanation for the illogical conclusion. If this conclusion is incorrect, will the appropriate areas of the Recirculated DEIR be corrected?

G-151	<ul style="list-style-type: none"> Why isn't the increase in the noise level the same for R5 (Residential adjacent to Phyllis Place) and R6 (Church adjacent to Phyllis Place) since these two areas appear on the map to be equally distant from the roadway connection? If this conclusion is incorrect, will the appropriate areas of the Recirculated DEIR be corrected? If elevation accounts for the difference in the noise level, would there be an increase in the noise level in the residential areas west of R5 (since this area has a lower elevation)?
G-152	<ul style="list-style-type: none"> Since Serra Mesa is located above Mission Valley where climatic and the environmental conditions included or considered in the noise analysis? If not, will an analysis be included? If not, provide an explanation for the exclusion.
G-153	<ul style="list-style-type: none"> Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway connection with a steep grade. <ul style="list-style-type: none"> What will be the noise level during the peak time? If this information won't be included, provide an explanation for the exclusion.
G-154	<ul style="list-style-type: none"> "Designate local truck routes to reduce truck traffic in noise-sensitive land uses areas." (Noise Element, NE-9) Can tractors, trailers, and buses be restricted from the roadway connection?
G-155	<ul style="list-style-type: none"> "Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor" (City of San Diego Final PEIR, p. 3.10-3). Phyllis Place will become a heavily used major arterial. Discuss the noise impact on the adjoining retirement/Senior homes, church, and single-family dwellings. (Refer to Addendum, p. 9)
G-156	<ul style="list-style-type: none"> The data for R11 – Residential adjacent to Via Alta is listed as 60 for existing but reduced to 57 for near-term baseline. Why would the sound level decrease?
G-157	<ul style="list-style-type: none"> The data for R-11 – Residential adjacent to Via Alta is listed as 60 for existing and for near-term with project. With the project there will be more traffic on Via Alta. Why doesn't the sound level increase?
G-158	<ul style="list-style-type: none"> The Final PEIR for the Quarry Falls Project (p. 10-49) identified 72 CNEL for the Franklin Ridge Road-Via Alta-Phyllis Place segment. Discuss the discrepancy between the Quarry Falls noise study and the noise study in this Recirculated DEIR. If the 72 CNEL is the actual noise level, will this Recirculated DEIR be updated? If not, provide an explanation for the exclusion.
G-159	<ul style="list-style-type: none"> "Although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses." (Noise Element, p. NE-10) The area of the roadway connection in Serra Mesa is zoned for single family dwellings and there will be single family units in the Civita area of the roadway connection. If it's determined that the Franklin Ridge Road-Via Alta-Phyllis Place segment is 72 CNEL (refer to previous bullet), discuss the allowance of a roadway connection in regards to the cited Noise Element guidelines and attenuation measures.
G-160	<p>Why would the dBA CNEL increase long term with the project versus without the project at site R2 (Residential adjacent to Mission Center Road north of Friars Road)? If more vehicles will be using the roadway connection, the noise level should logically decrease.</p>
G-161	<p>The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. What effect does the hard surface have on noise propagation? Was the road surface considered during the noise analysis?</p>

- G-162 | According to CEQA Guidelines, Article 9,15131 (b), “Economic or social effects of a project may be used to determine the significance of physical changes caused by the project... As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment.” Was an analysis made of the impacts of the roadway connection on the religious practices of City View Church and of Faith Community Church? If affirmative, what were the results? If not, will an analysis be conducted and included? If not, provide an explanation for the exclusion.
- G-163 | “Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor” (City of San Diego Final PEIR, p. 3.10-3). Mission Center Road from Aquatera to Murray Ridge Road without the connection will become a heavily used major roadway with ADTs of 23,850. Discuss the noise impact on the adjoining Hye Park condominium complex.

Biological Resources

- G-164 | The Biological Resources Letter, Appendix F, p. 6, states that “The quantification of biological resources described herein pertain to the project site only (approximately 2-acres) and do not include the 150-foot survey buffer evaluated during the reconnaissance. The 150-foot buffer is included on project maps to provide context as to the type of adjacent biological resources present only.”
- Refer to Figure 5.5-1 which indicates a 100-foot buffer encompassing the area of potential effect of a future roadway.” Is this 100-foot buffer the same as the 150-foot buffer referred to in the letter? Provide the analysis documentation.
 - If the roadway connection is approved, it will traverse through Phyllis Place Park and create the need for additional park space. Would this required additional space be located in the MSCP area? If affirmative, what does the assessment of this area indicate?
- G-165 |

Hydrology and Water Quality

- G-166 | If City View Church is required or finds it necessary to make changes to their parking lot and/or driveways because of the roadway connection, will changes to the stormwater drain system be required? If affirmative, provide a description of the changes, impacts, costs and the responsible party for the costs.

Visual Effects and Neighborhood Character

- G-167 | Some of the 56 retirement/Senior homes at City View Church have windows that face Phyllis Place. Were studies conducted to determine the impact on these homes of 1) vehicles traveling at night on the roadway connection with headlights on, 2) lights at night from street lights, and 3) light from the traffic signal at the intersection? If there is an impact, discuss mitigation measures. If a study wasn’t conducted, will one be conducted and if needed, mitigations discussed?
- G-168 | Phyllis Place is the only roadway in and out of the neighborhood for the 56 multifamily retirement/Senior units located at City View Church as well as for the Abbotshill area. (Refer to Addendum, p. 9) The roadway connection would increase ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place. Describe the criteria used to conclude that “impacts would be less than significant” (5.9.4).

G-169

The Steep Hillside Guidelines states “The recommendations came directly from the indicated Community Plan and conformance is required in order to make the findings for development approval” (p. 41). Stated for Mission Valley is “Orient development towards the valley and take access to Mission Valley projects from roads that do not extend above the 150-foot elevation contour.” (p. 42 and Recirculated DEIR, 5.9-7) Franklin Ridge Road will be above the 150-foot elevation contour. While the Recirculated DEIR mentions the 150-foot elevation contour requirement, it isn’t discussed in the impact analysis. Include a discussion of conformance with this policy or provide an explanation for the exclusion.

G-170

“Would the project result in (2) the creation of a negative aesthetic site or project; (3) substantial alteration to the existing or planned character of the area...” (5.9.5) Two park designs (one with the roadway connection and one without the roadway connection) have gone through the design approval process and the subsequent Park Development Agreement, p. 2, requires construction of the park. If the roadway connection was approved, the street would run through the park dividing it in two and Phyllis Place would be widened. Additional land will be needed for the park and for the road widening.

- Would the view from the park be impacted?
- Will the view from the bisected eastern portion of the park be the roadway connection on the west side and south side?

Will this information be included? If not, provide an explanation for the exclusion?

The park will be bisected by a roadway with 34,117 ADTs (2035) and will create a negative aesthetic, substantially altering the planned character of the area – Phyllis Place Park.

G-171

Phyllis Place will be changed from two lanes to five lanes (a major arterial) and the roadway connection will be four lanes. A huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution, for example).

- Discuss how this would not strongly contrast with the surrounding topography.
- The Significance Determination Thresholds states “Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area.” (p. 75) Discuss how this would not be a change in scale in comparison to the low density housing residential zoning.
- Given the significant changes, provide an explanation for the conclusion that “Impacts would be less than significant.”

During peak traffic times access from the Abbotshill community to the rest of Serra Mesa will be impacted, affecting the support of local businesses and civic events. Will this impact on neighborhood character be discussed? If not, provide an explanation for the exclusion.

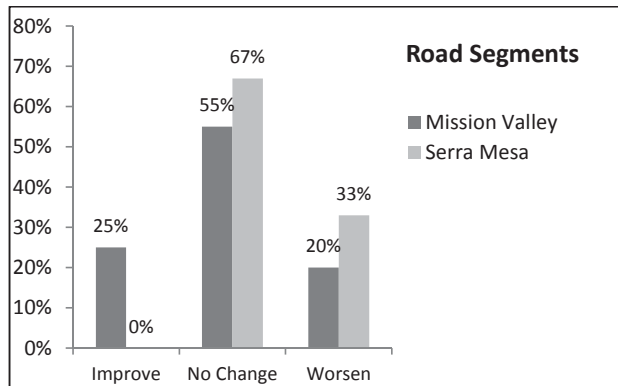
Cumulative Impacts

G-172

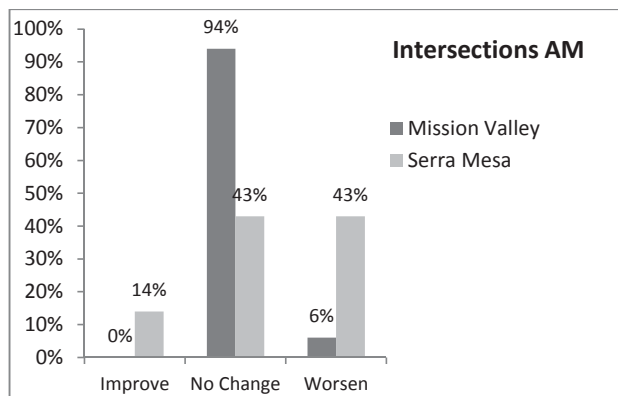
As shown in the analysis listed below the roadway connection long-term cumulative doesn’t alleviate congestion for both Serra Mesa and Mission Valley and increases congestion in Serra Mesa, especially at freeway ramps.

G-172
(cont'd)

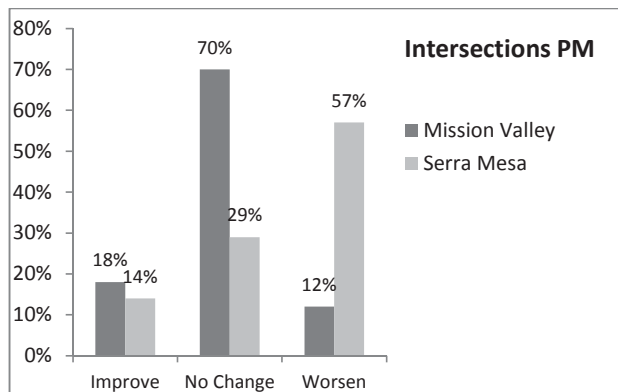
Analysis of the LOS Level Long-Term Baseline vs Long-Term Cumulative with Project - These charts are based on Tables 5.2-16 and Table 5.2-17. Analysis worksheets are in the Addendum, p. 5-8.



In both Serra Mesa and Mission Valley the greatest percentage of the roadway segments will receive the same LOS level. Also, in Serra Mesa one-third of the segments will worsen and none will improve.



The LOS No Change is almost 100% percentage for Mission Valley while in Serra Mesa both No Change and Worsen receive the same percentage.



In Mission Valley 70% of the intersections won't change LOS level while in Serra Mesa more than half of the intersections will worsen.

Conclusion: The road connection won't help most of the roadway segments and intersections in Mission Valley and will worsen ones in Serra Mesa.

On-Ramps for Long-Term Without the Roadway Connection in Comparison to With (refer to Table 5.2.18)

- Murray Ridge I-805 NB on-ramp AM delay increases 9 min; queueing from 0 to 3,886 ft (.74 mi).
- Murray Ridge I-805 SB on-ramp PM delay increases 31 min; queueing from 2,407 to 10,368 ft (1.96 mi), beyond Sandrock.

6 Cumulative Impact Analysis

G-173	<ul style="list-style-type: none">• Refer to Land Use sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Traffic Circulation/Parking and Parking sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Air Quality sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Noise sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Biological Resource sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Hydrology and Water Quality sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
	<ul style="list-style-type: none">• Refer to Visual Effects and Neighborhood Character sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.

6.2 List of Cumulative Projects –

G-174	<ul style="list-style-type: none">• Is this table up-to-date as of March 2017?
	<ul style="list-style-type: none">• There are some projects in Grantville/Allied Gardens (e.g., River Park and Centrepont).
G-175	<ul style="list-style-type: none">• There is a proposal to redevelop the Qualcomm Stadium site. People attending events use Serra Mesa streets to travel from I-805 to the stadium.
G-176	<ul style="list-style-type: none">• Can development occur along Mission Center Road from Aquatera to Murray Ridge Road? (A property owner has contacted the Serra Mesa Planning Group about changing the zoning.) If so, what would be the impact?
G-177	<ul style="list-style-type: none">• Is the Mission Village Shopping Center redevelopment project included in the list?
	<i>Will the table be changed to reflect updated information or added projects, appropriate studies and analyses? If not, provide an explanation for the exclusion.</i>

Effects Not Found to be Significant

- G-178 | Health & Safety regarding adopted emergency response plan or emergency evacuation plan: Emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa. This access provides for bicycle and pedestrian access and linkages. Does an evacuation plan exist for this site? Also, the developer will provide a minimum of one trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Refer to Addendum, p. 13) Discuss the impact a roadway connection which creates more congestion near the freeways will have on an adopted emergency plan at Kaplan/Aperture Circle if it exists or were developed.
- G-179 | Public Services and Facilities sections and any reference to the park at Phyllis Place of this letter: If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- G-180 | Fire Rescue Services – There is an existing emergency access between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
- Will this information be included in this section? If not, provide an explanation for the exclusion. If so, provide documentation.
 - Has the Fire-Rescue Department specifically stated that they support this roadway connection?
 - Was an analysis conducted to determine the difference in response time using the roadway connection versus using the Aperture Circle/Kaplan Drive access that already exists? Is the difference in response time significant?
- Natural Gas
- G-181 |
- Would any changes be needed to the fiber optics located in this area? If yes, will this information be included and discussed? If not, provide an explanation for the exclusion. (p. 7-2, p. 7-16)
- G-182 |
- Was SDG&E consulted to determine if a street connection would impact maintenance of high power lines? If yes, what were their comments? If not, will they be contacted? If they won't, provide an explanation for the exclusion.
- G-183 |
- High Pressure Gas Line
 - Will the construction of the roadway connection and/or the widening of Phyllis Place impact the gas line? Will relocation be needed? What are the risks to the gas line during roadway construction and/or, if required, during relocation?
 - With the increase in traffic on Phyllis Place will the high pressure gas line located in that area be impacted by the 1) load on top of the pipe and/or 2) weight? Was an analysis conducted of the risk for failure from vibrations?

Mandatory Discussion Areas

- G-184 | Significant Effects Which Cannot Be Avoided – It's hard to make the significant effects determination when there's critical information that's missing and pertinent studies that were not conducted. If any of the items identified in any sections of this letter will have a significant effect, will this section be updated? If not, provide an explanation for the exclusion.

Alternatives

G-185	<p>Selection of Objectives: The General Plan and Community Plan Amendment Manual, p. 5, states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:</p> <ol style="list-style-type: none"> 1. Whether police and fire response times would be improved with the road connection. 2. Whether the road connection could serve as an emergency evacuation route. 3. Whether it is feasible to make the road available for emergency access only. 4. Whether pedestrian and bicycle access would be improved by the street connection <p><i>If these objectives had been used, as required by the City Council as the project’s objectives instead of the objectives selected by staff/management in the studies and the analyses, what would be the conclusion for each alternative?</i></p>
G-186	<p>Table 9-1. Summary of Significant Effects of the Proposed Project doesn’t list: Results in a negative aesthetic site or project and Results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. The project is a roadway creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is permanent and substantially changes the character of the area – creating a significant impact to the community. If this information were considered, what would be the impact?</p>

Alternatives Considered but Rejected

G-187	<p>No Build/Remove from Mission Valley Community Plan Alternative - “This alternative is rejected because it would not meet any of the project objectives...” doesn’t consider the following:</p> <ol style="list-style-type: none"> 1. Resolve Community Plan Inconsistency by Providing Multi-modal Linkages <ul style="list-style-type: none"> • Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge. • A minimum of one trail for pedestrian and bike access between Civita and Phyllis Place Park is mandated with or without the road. • Pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
G-188	<ol style="list-style-type: none"> 2. Improve Local Mobility – In addition to the items listed in #1, consideration is not given to the <ul style="list-style-type: none"> • Gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicles accessing I-805. This gridlock will limit the mobility for the residents of the 200+ single family dwellings and the 56 retirement/Senior homes west of Franklin Ridge. • Required improvement to Mission Center Rd, if the roadway connection isn’t approved.
G-189	<ol style="list-style-type: none"> 3. Alleviate traffic congestion and improve navigational efficiency between Serra Mesa and Mission Valley <ul style="list-style-type: none"> • Options exist with Mission Center Road and Mission Village Drive. • Alleviate traffic congestion – Refer to bar chart analysis in this letter that shows the roadway connection for the most part does not alleviate traffic congestion in Mission Valley and worsens the congestion in Serra Mesa.

G-190	<p>4. Improve Emergency Access and Evacuation – Emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.</p>
G-191	<p>5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.</p> <p>Under Traffic Hazards (5.2.6) it's stated that "Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (Impact TRAF-19), and mitigation is required."</p> <p>Also, in this same section is the following comment "However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project." Additionally, it's stated "However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable." (5.2.6.1)</p> <p>The City's analysis indicates that Franklin Ridge Road will create an unsafe situation that is "significant and unavoidable." Given the situation described in this document, explain how this situation meets the objective to create a safe design and discuss liability issues regarding this unsafe situation. Also, refer to the other sections of this letter that describe environmental and neighborhood impacts.</p> <p><i>Explain how these objectives are met when the information described in the response for each objective is considered.</i></p>
G-192	<p>"...For example, the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)</p> <ul style="list-style-type: none"> • Climate Action Plan <ul style="list-style-type: none"> ○ Cite the reference in the City's Climate Action Plan that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley. ○ Are there other assumptions that were made in the Climate Action Plan that will require additional analysis (e.g., removal of the Regents Road Bridge from University City planning area)? What is the process that they went through for removal?
G-193	<ul style="list-style-type: none"> • Cite the reference in the Bicycle Master Plan that describes this assumption and specifically mentions a roadway connection. A <i>proposed</i> Class II bike lane for the roadway connection is shown in Figure 6-2 of the plan. There will be a bike path from Civita to Phyllis Place Park with or without the roadway connection. Since the Class II bike lane is listed as <i>proposed</i> what would require updating in the Bicycle Master Plan if the roadway connection wasn't approved?
G-194	<ul style="list-style-type: none"> • The Mission Valley Community Plan is in the process of being updated. Will an environmental analysis be needed for this community plan update process? Could the removal of the roadway connection from the Mission Valley Community Plan be made during this update process?
G-195	<p>The analysis doesn't mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments. Will these inconsistencies be added and discussed?</p> <ul style="list-style-type: none"> • The Sand and Gravel Re-use Development section (p. 56) states "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan.

G-196	<ul style="list-style-type: none"> “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.
G-197	<ul style="list-style-type: none"> “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (p. 124) <p>This alternative meets most of the objectives cited for the project and is feasible and should have been considered. Will this alternative be considered?</p>

Analysis of Alternative 1 - No Project Alternative

G-198	<p>Many of the issues that were discussed in the No Build/Remove from Mission Valley Community Plan Alternative section apply to this No Project section.</p> <p>Mission Center Road and Mission Village Drive provide multiple linkages between Serra Mesa and Mission Valley. Will this information be added to the analysis and considered in the conclusion? If not, provide an explanation for the exclusion.</p>
G-199	<p>“...Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project. Describe the criteria used to reach the “greater” conclusion.</p>
G-200	<p>If the inconsistencies in the Mission Valley Community Plan which probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, would the impacts be considered “greater”?</p>
G-201	<p>Conclusion – The following information was not included or discussed in this Recirculated DEIR:</p> <p><i>Emergency access exists between Aperture Circle in Civita and Kaplan Drive Serra Mesa.</i></p> <p><i>The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages. (Refer to Addendum, p. 10)</i></p> <p><i>The developer will provide a minimum of one trail connection for pedestrians and bikers between Phyllis Place Park and Civita in Mission Valley. (Refer to Addendum, p.13)</i></p> <p><i>Mission Center Road is a direct route connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley.</i></p> <ul style="list-style-type: none"> If this information were included and used in the evaluation, what would be the impact on the “No Project” alternative? If the issues that staff was required to study as defined in the City Council Resolution were considered, what would be the outcome? (Refer to Objectives section of this letter.) If the mitigations that will probably not be implemented are considered, what would be the outcome?
G-202	<p>Air Quality – If an analysis of air quality in the Hye Park condominium complex area is conducted and shows a significant impact without the street connection, will this result be added and discussed? If not, provide an explanation for the exclusion.</p>
G-203	<p>The No Project Alternative would meet most of the objectives. Refer to the discussion in this letter for No Build/Remove from Mission Valley Community Plan.</p>

Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

G-204

- Land Use – The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?
- Transportation/Circulation and Parking – Refer to the Transportation/Circulation and Parking section of this letter. Questions are raised about the validity of the Community Access data. If this data is revised, would the conclusion change?
- Relationship to Objectives – Refer to the Objectives section of this letter. If staff were to study the objectives as defined in the City Council Resolution, what would be the outcome?

Environmentally Superior Alternative

G-205

The conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities.

- Linkages already exist with Mission Center Road and Mission Village Drive.
- The Mission Valley Community Plan is inconsistent with the Serra Mesa Community Plan and contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.”

What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered? For discussion refer to the No Build/Remove from Mission Valley Community Plan Alternative section in this letter.

G-206

Additionally, it’s stated that “...both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project.”

- The studies don’t necessarily support this conclusion for the “Alternative 1- No Project Alternative” and “Alternative 2 – Bicycle, Pedestrian, Emergency Access Only Alternative.” Refer to the discussion under alternatives in this letter and to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-33).

G-207

- With the street connection there is a 31 minute delay at I-805 SB on-ramp (p. 5.2-35). To reduce the delay to zero requires mitigation – fair share contribution to Caltrans. The impacts of the mitigation and the feasibility of implementation aren’t discussed. The “No Street Connection” shows 15 minute delays on I-805 (Appendix C) in the year 2035, which is within the City’s acceptable threshold. The data doesn’t support the analysis that the No Street Connection “would result in greater impacts associated with transportation and traffic...” (9.5.3) Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion.

G-208

It’s stated that “...these impacts would be mitigated to less-than-significant levels under the proposed project.” Refer to the Mitigation section of this letter. If the infeasible mitigations aren’t included, what would be the impact?

G-209

The statement is made “It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or in the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.” If it were determined that the VMT study is inaccurate, what would be the impact on this conclusion?

Conclusion

This chart summarizes the major issues that have been described in the body of this letter. Refer to the appropriate sections of the letter for a description/discussion of the item/comment.

G-210

Flaw	Item/Comment
Omission	Emergency, bike, and pedestrian access exists between Kaplan Dr in Serra Mesa and Aperture Circle in Civita (Mission Valley). ^{2,3}
Omission	Multifamily units at City View Church are Retirement/Senior housing (sensitive receptors) ^{2,3} located approximately 300 feet from the roadway connection.
Omission	Mission Valley Community Plan is in the process of being updated; inconsistency with Serra Mesa Community Plan could be corrected at this time. ³
Omission	Trail for pedestrians and bicyclists linking Civita and Phyllis Place Park already mandated without the roadway connection. ^{1,3}
Omitted in discussion	Mission Center Rd and Mission Village Dr provide a direct link between Serra Mesa and Mission Valley. ³ This was not included in the sections discussing linkages.
Violates City Policies and Goals	<ul style="list-style-type: none"> • Walkable Community and City of Villages^{1,2,3} (e.g., impacts on bisected park and roadway connection will increase traffic on Civita local streets). • Fosters auto dependency^{2,3} (e.g., roadway connection won't encourage mass transit usage).³ • Vehicle congestion relief³ (e.g., bar charts in this letter show an increase in congestion in Serra Mesa and Mission Valley). • Bicycling¹ (e.g., mitigations require bike lane removal)³ • Safe and efficient street design² (e.g., safety of bisected park³; City View driveway deemed to provide a safety hazard for vehicles entering or exiting at City View).
Violates Serra Mesa Community Plan	References from SMCP: <ul style="list-style-type: none"> • Street widening and other improvements should be minimized.³ • Safe transportation system with minimal adverse effects.³ • Steep hillside and canyons protected and preserved.³
Violates Mission Valley Community Plan	References from MVCP: <ul style="list-style-type: none"> • Streets should be connected to road network and not to the mesas.³ • Franklin Ridge Rd extension is 4 lanes rather than stipulated 2 lanes.³ • Roadway connection would extend above the 150-foot contour restriction.

G-210
(cont'd)

Flaw	Item/Comment
Traffic Impact Study & Analysis Inadequate; Data may be invalid	<ul style="list-style-type: none"> • Inadequate Traffic Impact Study (traffic counts outdated).³ • Impact of queuing on residential area not studied (e.g., long term 31 min delay at I-805 SB Ramp PM).³ • Study not comprehensive – Not studied: the adjacent main streets of Serra Mesa (e.g., Greyling Dr), Texas St (a direct thoroughfare), Friars near Qualcomm Stadium.³ • Possibility of induced traffic not studied.³ • Not all of the proposed and/or approved projects for Mission Valley are included in the study.³ • If roadway connection not approved, developer required to make improvements to Mission Center Rd. These improvements aren't considered in the analyses.³
Inconsistency	In Recirculated DEIR description of Phyllis Place from Franklin Ridge to I-805 SB ramp described as widening (p. 5.2-27) in MM-TRAF-3 and as reconfiguring in MM-TRAF-11 (p. 5.2-39).
Air Quality & Noise Analysis Validity	<ul style="list-style-type: none"> • Impacts on sensitive receptors not studied.³ • Air quality and Noise analysis is based on Traffic Impact Study and will be invalid if the Traffic Impact Study is invalid.³
Data May Not Be Valid	No basis for estimate made of current VMT in (all) regions with VMT affected by the proposed road connection nor any basis for estimating the extent of increase or decrease in VMT expected from the roadway connection. Data used for VMT analysis inaccurate.
Deficient	Recirculated DEIR objectives don't agree with City Council Resolution and mandates.
Objectives Not Met	Both Recirculated DEIR objectives (which are different from the ones in DPEIR) and City Council's objectives (see references in letter) aren't met.
Mitigation Analysis Inadequate or Infeasible	<ul style="list-style-type: none"> • Detailed description not provided for all mitigations (e.g., Murray Ridge and I-805 NB and SB ramps). • Impact on environment for mitigations not studied/discussed (e.g., land needed for widening of Phyllis Place from two lanes to five lanes).³ • Impact of implementation of mitigations on adjacent streets not studied/discussed (e.g., Raejean, Greyling Dr, etc.).³ • Implementation of 6 of the 19 mitigations violates City's land use and mobility policies; 8 of 19 mitigations assume mitigation will not occur; 10 of 19 mitigations would remain Significant and Unavoidable. (Letter, Impacts Section)
Conclusion Not Based on Evidence	Negative aesthetic site of project and substantial alteration to existing or planned character of area considered insignificant. Evidence: park bisected by roadway and ADTs increase from 2,420 (existing) to 34,540 (long term). Huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution for example).
Conclusion Not Based on Evidence	<ul style="list-style-type: none"> • Recirculated DEIR indicates the alternatives would result in greater impacts associated with transportation and traffic. Cumulative impact bar chart analysis proves the roadway connection results in greater impacts in Serra Mesa. • Many of the mitigations aren't feasible. An analysis using any infeasible mitigation to show a less-than-significant impact is inaccurate.

G-210
(cont'd)

Flaw	Item/Comment
Conclusion Not Based on Evidence	<p>The No Build/Remove from Mission Valley Community Plan Alternative was rejected because it didn't meet the Recirculated DEIR project objectives. When, in reality, the facts are:</p> <ul style="list-style-type: none"> • Mission Center Rd provides a multi-modal linkage. • Trail for pedestrian and bike access is mandated. • Emergency access exists. • Increase in congestion if roadway connection built (Letter, bar charts). • Required improvement to Mission Center Rd if roadway connection not approved (Final PEIR for the Quarry Falls Project). • Recirculated DEIR admits that the roadway connection creates a "safety hazard" for vehicles entering and exiting at the City View Church • Data supporting contention that the City's Climate Action Plan and Bicycle Master Plan Update would be inconsistent not provided. <p>This alternative is feasible.</p>
Inconsistency & A Priori Assumption	<p>In discussing the No Build/Remove from Mission Valley Community Plan Alternative this statement is made "... the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)</p> <p>The City knew in 2008 prior to the development of the Climate Action Plan (2015) and the Bicycle Master Plan (2013) that there was a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan.</p>

¹ Refers to Final PEIR for the Quarry Falls Project, July 2008

² Refers to Notice of Preparation, 2012

³ Refers to Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report, dated 4/15/2016

G-211

As indicated in the above chart comments were made and submitted during the NOP and the DPEIR timeframe. The corrections weren't made to this Recirculated DEIR. This Recirculated DEIR is inadequate and many of the mitigation measures are infeasible because they conflict with the City's land use and mobility policies and/or cost.

Thank you for the opportunity to review this Recirculated DEIR. If you have any questions with reference to any of the items raised in our response, please contact me. We look forward to your response within the duly allowed timeframe.

Sincerely,



Bob Crider
Chair, Serra Mesa Planning Group

References

These substantial background records are already within the city's files and records and state records. If a full copy is desired, requested, or necessary to be submitted, please inform the above writer.

City of San Diego. 2016. *California Environmental Quality Act Significance Determination Thresholds*. July. Available:
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https://www.sandiego.gov/sites/default/files/draft_eir_serra_mesa_community_plan_amendment_street_connection_041816.pdf.

G-212
(cont'd)

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- City of San Diego. 2002. *Street Design Manual 2002*. Available: <https://www.sandiego.gov/planning/programs/transportation/library/stdesign>.
- City of San Diego. 1998. Traffic Impact Study Manual. July. Available: <http://www.sandiego.gov/development-services/pdf/industry/trafficimpact.pdf>
- SANDAG, Transportation Forecast Information Center. Access <http://tfic.sandag.org/> > Zoom to Phyllis Place vicinity > Select Series 12 > Forecast Year 2035 > Click on appropriate street (Note: Franklin Ridge segment between Phyllis Place and Via Alta (information on street is misidentified as Murray Ridge).
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- State of California, 2014. Updating Transportation Impacts Analysis in the CEQA Guidelines. Available: http://www.catc.ca.gov/meetings/agenda/2014Agenda/2014_10/Yellows/Tab18_%204%205.pdf.

Attachment - Missing Online Included in the Addendum, p. 1-4

City Council Resolution 304297: A Resolution of the Council of the City of San Diego Initiating An Amendment to the General Plan and Serra Mesa Community Plan to Include a Street Connection Between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element for the Quarry Falls Project October 2008.

Addendum

City Council Resolution R-304297

G-212
(cont'd)

R-304297 - SMCP Initiation Resolution.pdf - Adobe Reader

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(R-2009-541) 3216
MEET 10/21

RESOLUTION NUMBER R- 304297

DATE OF FINAL PASSAGE OCT 21 2008

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO INITIATING AN AMENDMENT TO THE GENERAL PLAN AND SERRA MESA COMMUNITY PLAN TO INCLUDE A STREET CONNECTION BETWEEN PHYLLIS PLACE AND FRIARS ROAD IN THE SERRA MESA COMMUNITY PLAN CIRCULATION ELEMENT FOR THE QUARRY FALLS PROJECT.

WHEREAS, on May 11, 2005, Quarry Falls, LLC., submitted an application to the City of San Diego for a community plan amendment, General Plan amendment, rezone, specific plan, Master Planned Development Permit, Site Development Permit, vesting tentative map, and Conditional Use Permit/Reclamation Plan amendment for the Quarry Falls Project; and

WHEREAS, on October 21, 2008, the Council of the City of San Diego held a public hearing to consider approval of the Quarry Falls Project and related actions, including Staff Recommendation No. 6, recommending the initiation of an amendment to the General Plan and Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element; and

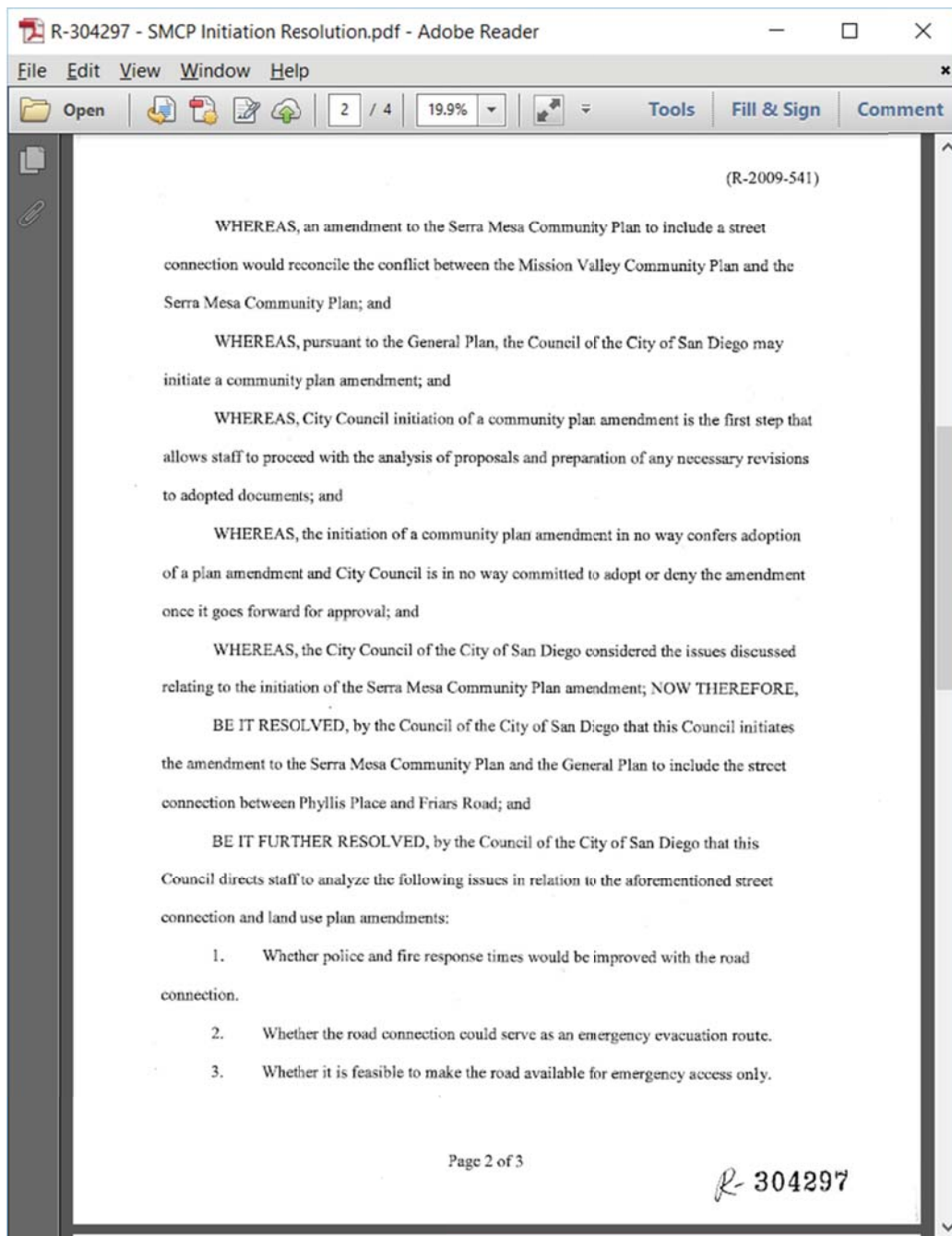
WHEREAS, the construction of the street connection between Phyllis Place and Friars Road and the associated land use plan amendments were analyzed in Environmental Impact Report No. 49068 certified for the Quarry Falls Project; and

WHEREAS, the Serra Mesa Community Plan does not include a street connection between Phyllis Place and Friars Road; and

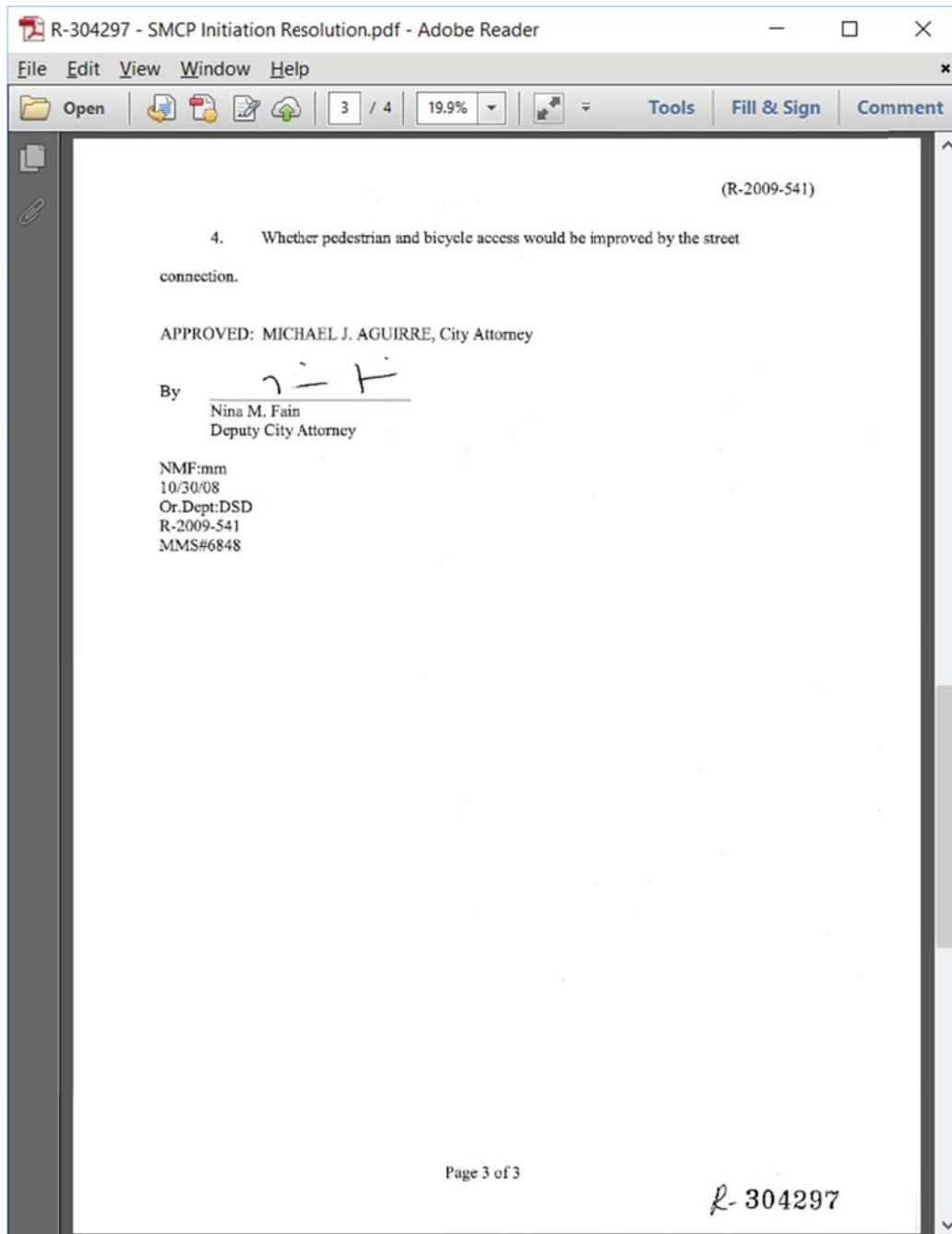
WHEREAS, the Mission Valley Community Plan recommends the inclusion of a street connection between Phyllis Place and Friars Road; and

Page 1 of 3

G-212
(cont'd)



G-212
(cont'd)



G-212
(cont'd)

R-304297 - SMCP Initiation Resolution.pdf - Adobe Reader

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Passed by the Council of The City of San Diego on OCT 21 2008, by the following vote:

Council Members	Yeas	Nays	Not Present	Recused
Scott Peters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kevin Faulconer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toni Atkins	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anthony Young	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brian Maienschein	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Donna Frye	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jim Macaffer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ben Hueso	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Date of final passage OCT 21 2008

AUTHENTICATED BY:

(Seal)

JERRY SANDERS
Mayor of The City of San Diego, California.

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By Mary Zumaiga, Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 304297

Data Analysis

Intersection AM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worsen	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	B		B				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	B		B				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		E		C		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	C		C				X			
7. Mission Center Rd & Westside Dr	B		B				X			
8. Mission Center Rd & Friars Rd/EB ramps	B		B				X			
9. Mission Center Rd & Friars/WB ramps	B		B				X			
10. Mission Center Rd & Mission Center Ct	C		C				X			
11. Aero Dr & Sandrock Rd		B		B				X		
12. Murray Ridge Rd & Sandrock Rd		B		B				X		
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		B		C						X
15. Murray Ridge & I-805 SB ramp		C		E						X
16. Qualcomm Wy & Friars EB ramp	C		C				X			
17. Qualcomm Wy & Friars WB ramp	C		C				X			
18. Qualcomm Wy & Rio Bonito Wy	C		C				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		A						X***
21. Via Alta & Franklin Ridge Rd	D		D				X			
22. Via Alta & Civita	B		B				X			
23. Civita Blvd & Russell Pkwy/Gill Village Dr	A		B						X	
24. Qualcomm Wy & Civita Blvd	B		B				X			
Total	17	7			0	1	16	3	1	3
% of Total by Community					0%	14%	94%	43%	6%	43%

*Data from Table 5.2-17

**MV=Mission Valley; SM=Serra Mesa

***Starting data is 0; adding traffic impacts it

Analysis for Intersections AM

- Serra Mesa Intersections: 14%, improve; 43%, no change; 43%, worsen
- Mission Valley Intersections: 0%, improve; 94%, no change; 6%, worsen

Intersection PM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worse	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	C		C				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	E		E				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		F		D		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	D		C		X					
7. Mission Center Rd & Westside Dr	C		C				X			
8. Mission Center Rd & Friars Rd/EB ramps	C		B		X					
9. Mission Center Rd & Friars/WB ramps	C		C				X			
10. Mission Center Rd & Mission Center Ct	D		D				X			
11. Aero Dr & Sandroock Rd		C		C				X		
12. Murray Ridge Rd & Sandroock Rd		D		E						X
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		D		F						X
15. Murray Ridge & I-805 SB ramp		E		F						X
16. Qualcomm Wy & Friars EB ramp	E		E				X			
17. Qualcomm Wy & Friars WB ramp	F		E		X					
18. Qualcomm Wy & Rio Bonito Wy	D		D				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		B						X***
21. Via Alta & Franklin Ridge Rd	B		F						X	
22. Via Alta & Civita	B		C						X	
23. Civita Blvd & Russell Pkwy/Gill Village Dr	C		C				X			
24. Qualcomm Wy & Civita Blvd	C		C				X			
Total	17	7			3	1	12	2	2	4
% of Total by Community					18%	14%	70%	29%	12%	57%

*Data from Table 5.2-17

**MV=Mission Valley; SM=Serra Mesa

***Starting data is 0; adding traffic impacts it

Analysis for Intersections PM

- Serra Mesa Intersections: 14%, improve; 29%, no change; 57%, worsen
- Mission Valley Intersections: 18%, improve; 70%, no change; 12%, worsen

Roadway Segment Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Roadway Segment	Mission Valley	Serra Mesa	LOS W/Out Project	LOS With Project	Change in LOS**					
					Improve		No Change		Worsen	
					MV	SM	MV	SM	MV	SM
Civita Blvd										
Mission Center Rd to Via Alta	X		B	A	X					
Via Alta to Russell Parkway	X		B	A	X					
Russell Pkwy to Qualcomm Wy	X		C	B	X					
Qualcomm Wy to Franklin Ridge	X		A	C					X	
Franklin Ridge Rd										
Via Alta to Civita	X		C	F					X	
Phyllis Place to Via Alta		X	0	D						X
Friars Rd										
Mission Center Rd to Qualcomm Wy	X		C	C			X			
Qualcomm Wy to Fenton Pkwy	X		C	C			X			
Fenton Pkwy to Northside Dr	X		C	C			X			
Mission Center Rd										
Hazard Center Dr to Friars Rd	X		D	D			X			
Friars Rd to Mission Center Drwy	X		C	C			X			
Mission Center Drwy to Mission Valley Rd	X		B	B			X			
Mission Valley Rd to Aquatera Drwy	X		C	A	X					
Aquatera Drwy to Murray Ridge Rd		X***	F	F				X		
Murray Ridge Rd										
I-805 NB ramp to Mission Center Rd		X	F	F				X		
Mission Center Rd to Pinecrest Ave		X	F	F				X		
Pinecrest Ave to Sandrock Rd		X	F	F				X		
Phyllis Pl										
Abbotshill Rd to Franklin Ridge Rd		X	A	A				X		
Franklin Ridge Rd to I-805 SB ramp		X	A	F						X
I-805 SB ramp to I-805 NB ramp		X	E	F						X
Qualcomm Way										
Civita Blvd to Friars Rd WB ramp	X		B	C					X	
Friars Rd WB to Friars Rd EB ramp	X		B	B			X			
Friars Rd EB ramp to Rio San Diego	X		B	B			X			
Rio San Diego Dr										
Qualcomm Wy to Rio Bonito Wy	X		E	E			X			
Russell Pkwy										
Civita Blvd to Friars Rd	X		C	C			X			
Sandrock Rd										
Murray Ridge to Aero Dr		X	D	D				X		
Westside Dr										
Mission Center Rd to Via Alta	X		C	D					X	
Via Alta										
Franklin Ridge Rd to Civita Blvd	X		A	C					X	
Civita Blvd to Westside Dr	X		A	A			X			
Total	20	9			4	0	11	6	5	3
% of Total by Community					25%	0%	55%	67%	20%	33%

*Data from Table 5.2-16

**MV=Mission Valley; SM=Serra Mesa

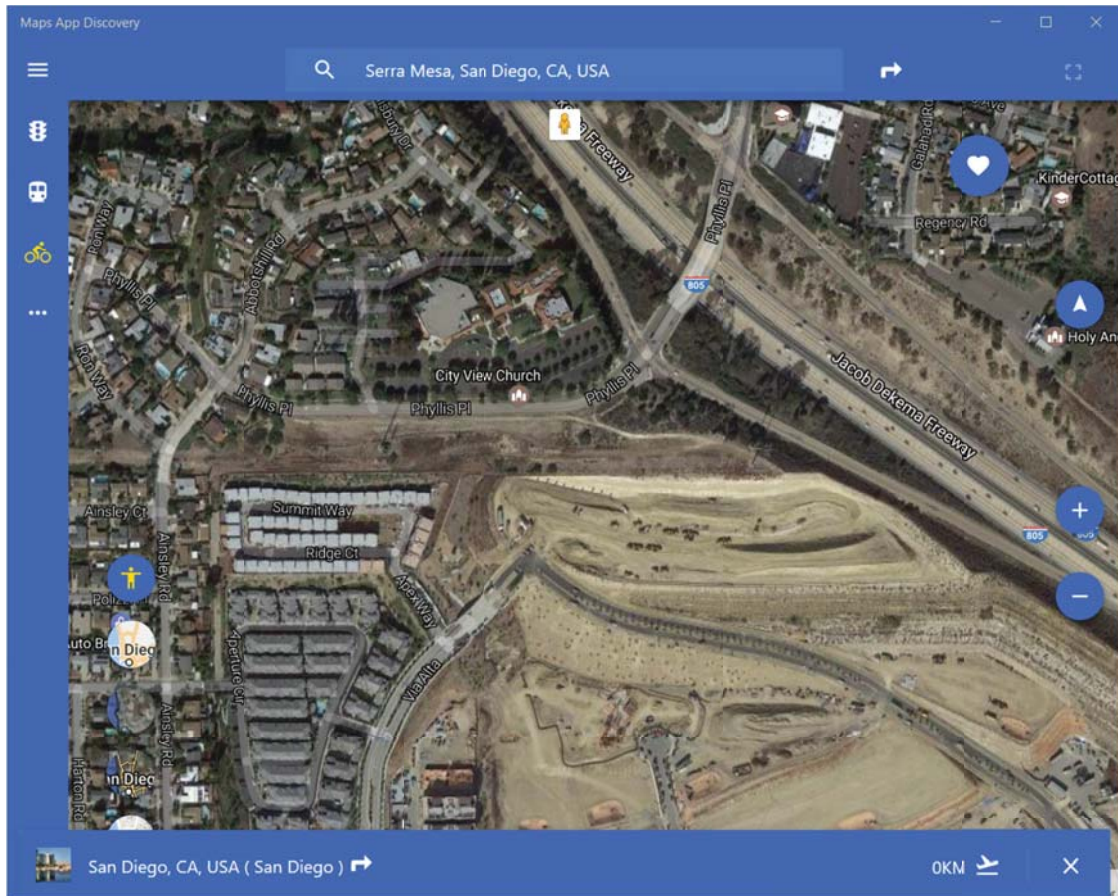
***Most of this area is in Serra Mesa

Analysis for Roadway Segment

- Serra Mesa Segments: 0%, improve; 67%, no change; 33%, worsen
- Mission Valley Segments: 25%, improve; 55%, no change; 20%, worsen

Maps

View of City View Church, Via Alta & Franklin Ridge, Freeways and Housing in Serra Mesa and Civita

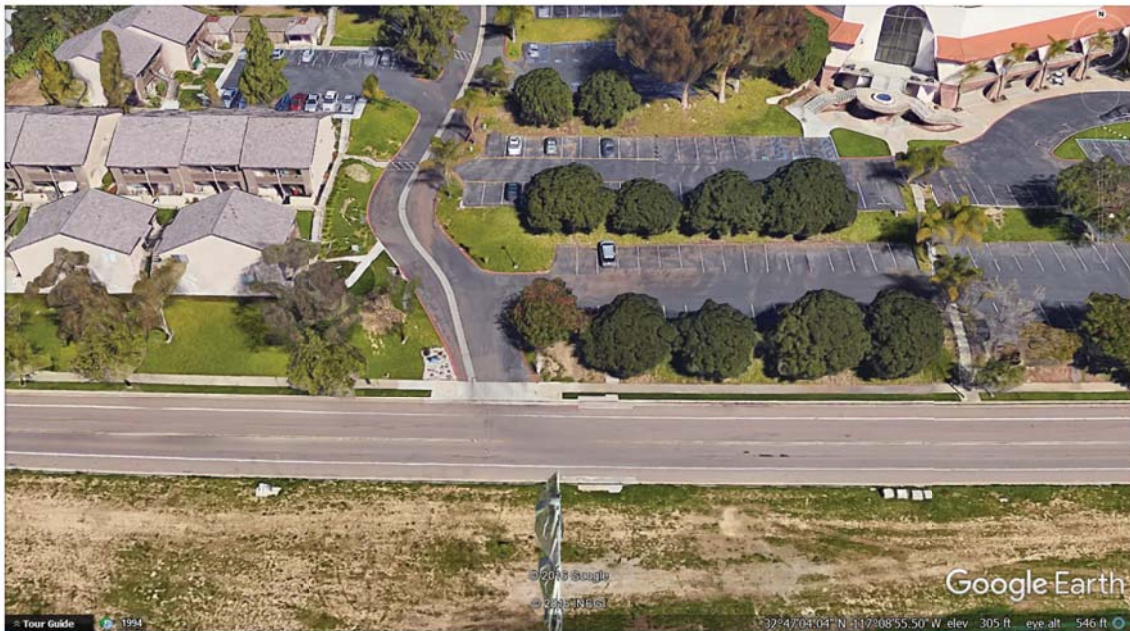


City View Church's Two Driveways, Retirement/Senior Housing, Transmission Line & Steep Hillside
Roadway connection will be located south side of Phyllis Pl across from church's east driveway and path.

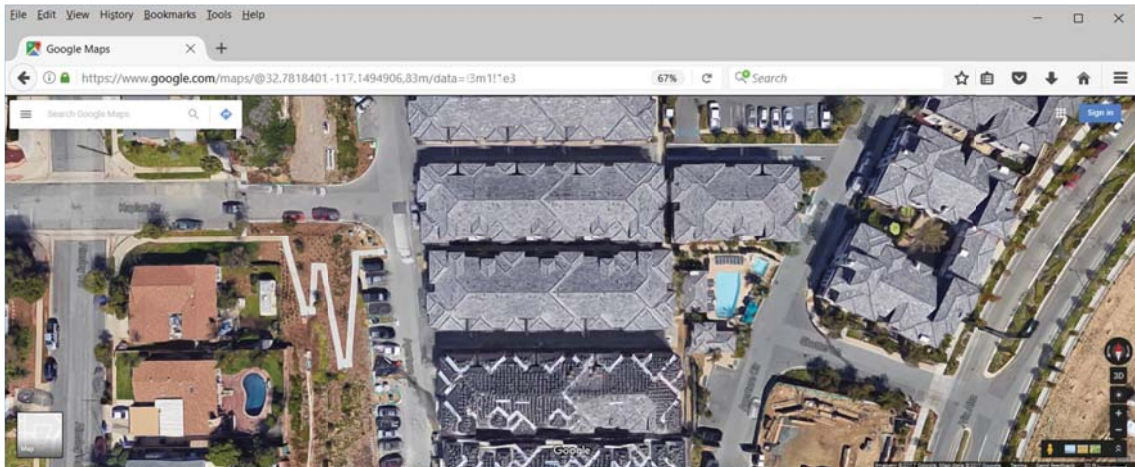
G-212
 (cont'd)



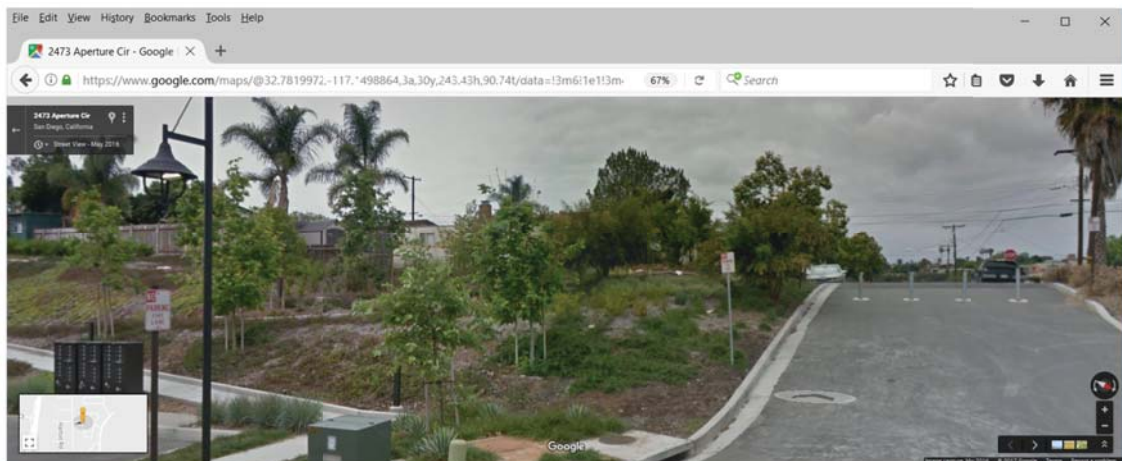
Retirement/Senior Housing (windows facing street); Roadway connection across street from church path



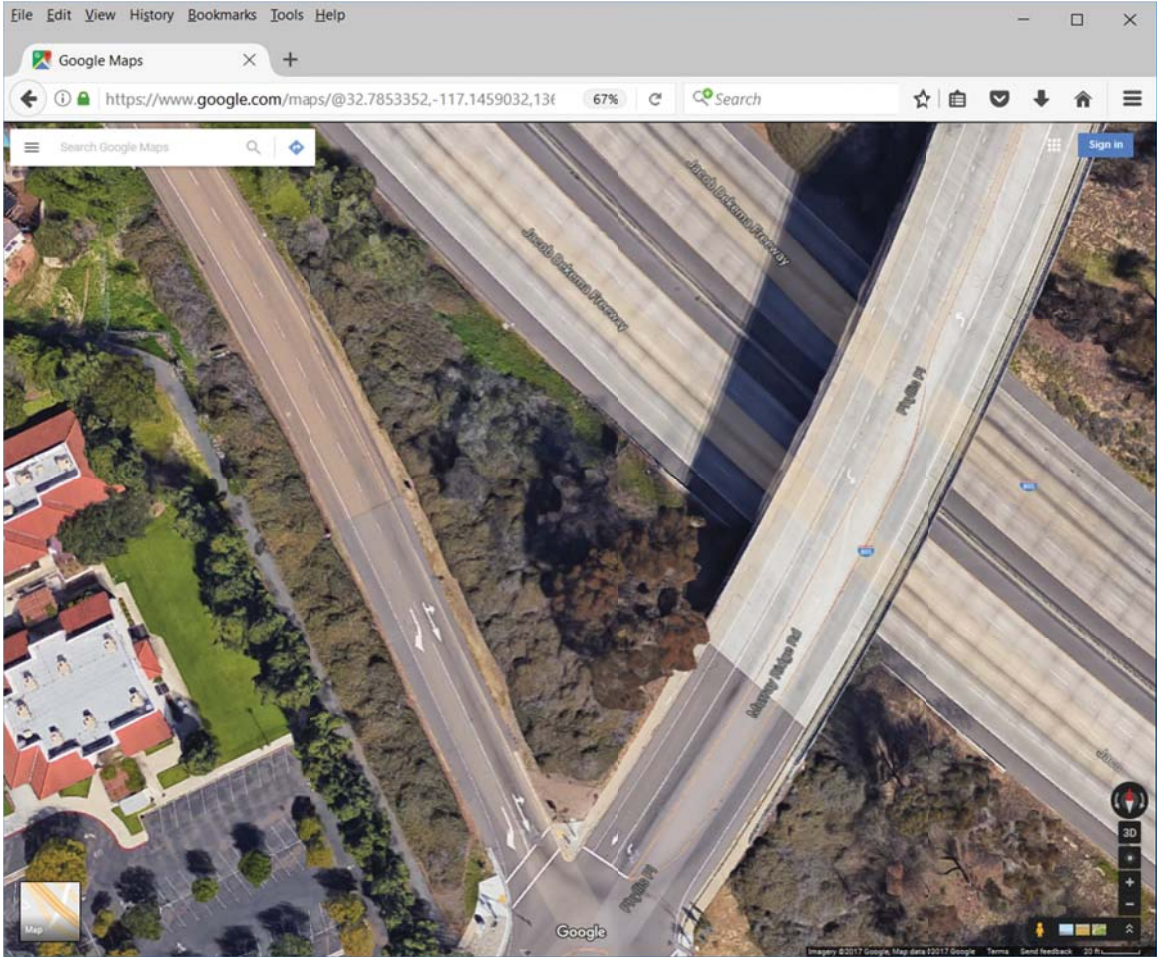
Shows Emergency Access at Kaplan and Aperture Circle and
Sidewalk (switchback) adjacent to Kaplan from Ainsley to Aperture Circle



Shows Emergency Access (bollards) at Kaplan and Aperture Circle and some of the sidewalk

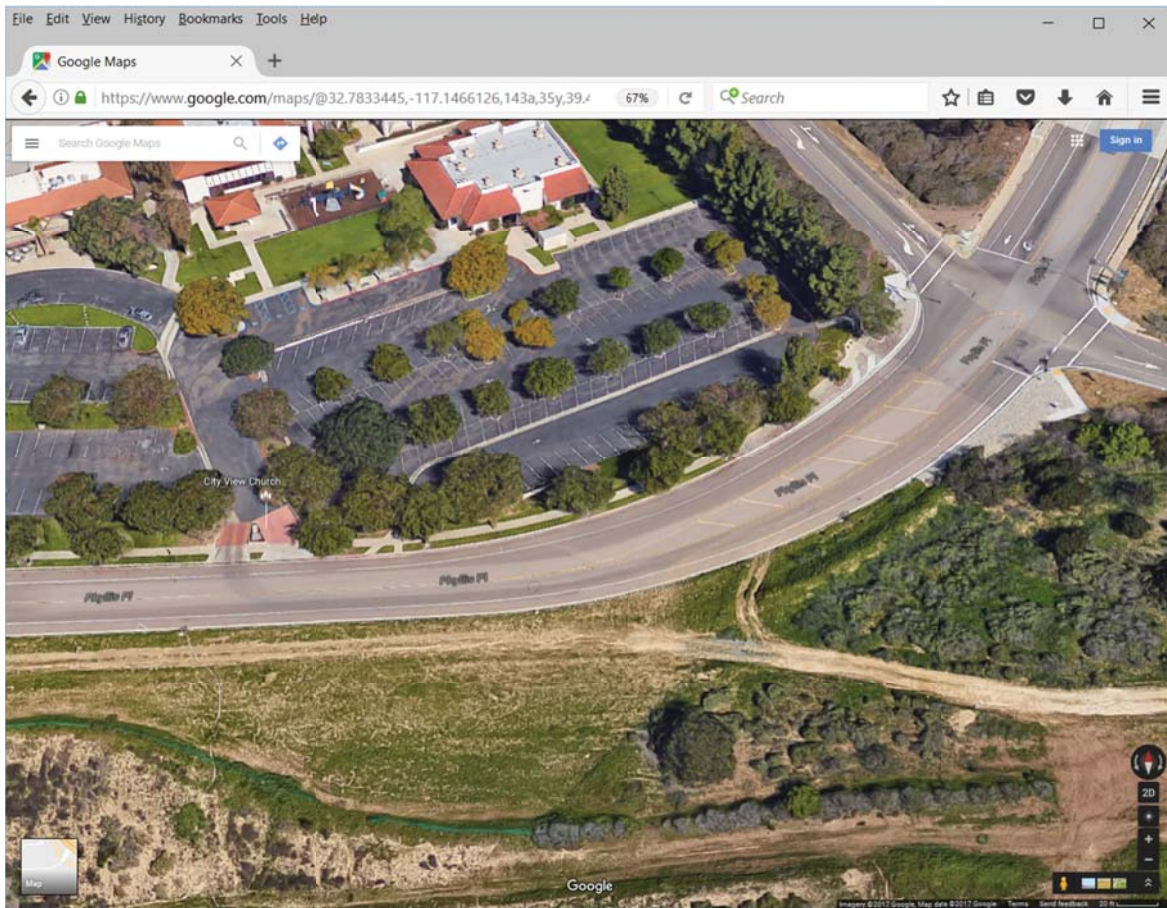


I-805 Phyllis Place Bridge – Shows Lanes over the Bridge



G-212
(cont'd)

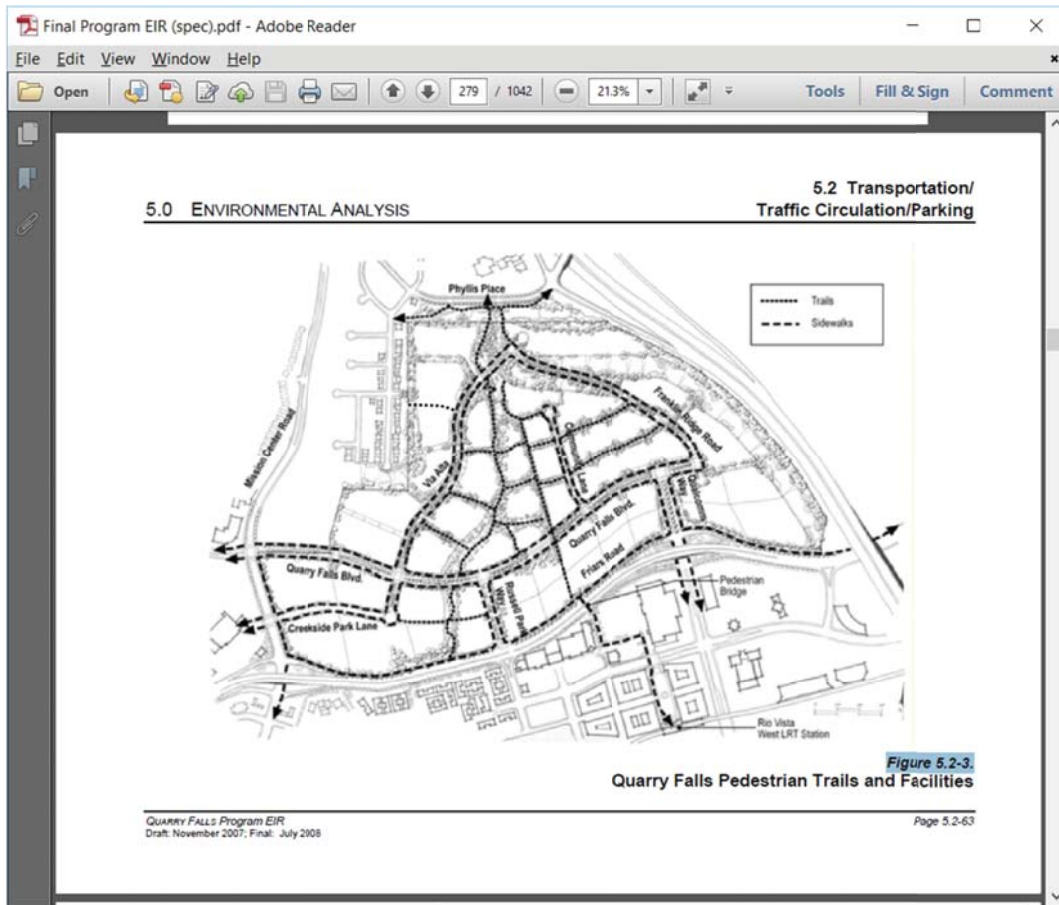
I-805 NB and SB Ramps and City View Church



G-212
(cont'd)

Trail from Civita to Serra Mesa

G-212
(cont'd)



In accordance with our mandate under Article II, Section 1 of Council Policy 600-24 to make recommendations to the City Council, Planning Commission, and City staff concerning the preparation of, adoption of, implementation of or amendment to a land use plan, the Serra Mesa Planning Group hereby presents the following comments for inclusion in the staff report to the Planning Commission and City Council on the Proposed Serra Mesa Community Plan Amendment Roadway Connection Project, Project No. 265605 SCH No. 2012011048.

SERRA MESA PLANNING GROUP'S SUMMARY/POSITION STATEMENT

1. SMPG recommends AGAINST amending the Serra Mesa Community Plan to include the roadway connection for the following reasons:
 - The emergency connection is redundant and is neither required nor necessary.
 - The connection will not improve overall traffic flow in the study area and, in fact, will degrade it.
 - The proposed Amendment has been rejected numerous times by Planning Commission (2004 and 2008) and City Council (2005).
 - The connection is strongly opposed by the affected Community.
2. SMPG recommends NOT to amend the Serra Mesa Community Plan to include a roadway connection on the basis that the Recirculated DEIR does not meet project objectives and shows a significant negative environmental impact on traffic. The Recirculated DEIR inadequately studied noise and pollution impacts (e.g., sensitive receptors not considered).

The Recirculated DEIR is NOT complete and NOT in compliance with CEQA. Information is fundamentally inadequate and conclusory.

- Two communities are connected with the existing emergency, pedestrian and bicyclist access between Kaplan Drive in Serra Mesa and Aperture Circle in Mission Valley. Also, at least one trail for pedestrians and bicyclists from Civita to Phyllis Place Park is mandated with or without the roadway connection.
 - Mission Center Road and Mission Village Drive provide interconnectivity between the two communities.
3. SMPG recommends that the proposed Community Plan Amendment be DENIED. The CPA does not meet proposed goals and does not benefit the residents of either community.
 4. SMPG recommends that the Mission Valley Community Plan be REVISED to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts transportation/circulation in both communities.

EMERGENCY ROAD CONNECTION ANALYSIS FLAW

When the City Council requested the initiation of this CPA in 2008, their discussion was heavily focused on public safety, emergency evacuation, and fire department access. Unfortunately, no one who was so authorized informed the Council during this discussion that there is already an emergency-only connection at Kaplan Drive from Civita to Serra Mesa designed into the project and currently in use.

Issues City Council directed staff to analyze	Findings
1. Whether police and fire response time would be improved with road connection	Study/Documentation to support City's position of improvement not provided; Recirculated DEIR didn't consider Kaplan Dr
2. Whether the road connection could serve as an emergency evacuation route	Evacuation route already exists at Kaplan Dr and Aperture Circle
3. Whether it is feasible to make the road available for emergency access only	Emergency access already exists at Kaplan Dr and Aperture Circle
4. Whether pedestrian and bicycle access would be improved by the street connection	Pedestrian and bicycle access exists at Kaplan Dr and trail from Civita to Phyllis Place Park is mandated

ROADWAY CONNECTION IMPACTS

- Required 1.33 acre linear park along Phyllis Place divided in two by connection – safety issues
- Required to relocate high-pressure gas line
- Impacts environment, constructed through sensitive habitat, particularly coastal sage scrub
- Impacts 56 multifamily retirement/Senior units located across from roadway connection
- Creates “Potential to result in safety hazard for vehicles entering or exiting the City View Church” (5.2.6.1); church is located across from roadway intersection; church driveway and roadway intersection won’t align
- Steep grade (developer indicates steepest just under 10%) not considered in noise and air quality studies
- Mitigation requires removal of bicycle lanes on both sides of Murray Ridge to Sandrock Road; “City’s ability to implement...may be limited” so “impact would remain significant and unavoidable” (DEIR, p. 5.2-39)
- Implementation of 6 of the 19 mitigations violates City’s land use and mobility policies; 8 of the 19 mitigations assumes mitigation will not occur; 10 of the 19 mitigations would remain Significant and Unavoidable
- Huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution for example)

TRAFFIC IMPACTS

Roadway connection “generally relieve congestion on neighborhood streets” (DEIR, p. 5-1-15). This isn’t proven by the traffic studies long term analysis. See attachment for charts.

Impact Areas	Without Connection	With Connection	Results With Connection
Phyllis Pl	ADTs: 2,420	ADTs: 34,540	Significant Increased Traffic - Worse
Franklin Ridge/Via Alta to Civita	LOS: C	LOS: F	More traffic - Worse
I-805 Bridge	LOS: E	LOS: F	61% More Vehicles - Worse
I-805 on-ramps	Delays < 15 min	Delays 31-43 min ¹	Significant Delays - Worse
I-805 freeway	LOS: F	LOS: F	"would result in significant impact at six freeway segments" ²
*ADT=Average Daily Trips, *LOS=Traffic Level Of Service, *F=forced flow, extreme congestion, ¹ Appendix C, p. 61, ² DEIR, p. 5.2-37			

Already planned and approved Phase 1 of SR-163 and Friars Road Interchange Project; scheduled for fall 2017 construction; will alleviate severe traffic delays on Friars Road (City website).

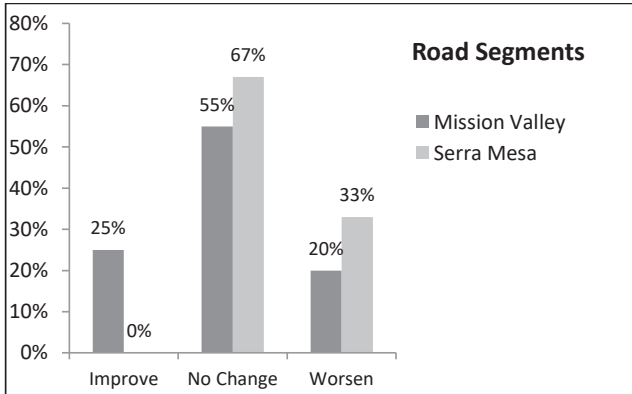
MISSION VALLEY COMMUNITY PLAN INCONSISTENCY

The Sand and Gravel Re-use Development section of the Mission Valley Community Plan (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” This statement is consistent with the Serra Mesa Community Plan.

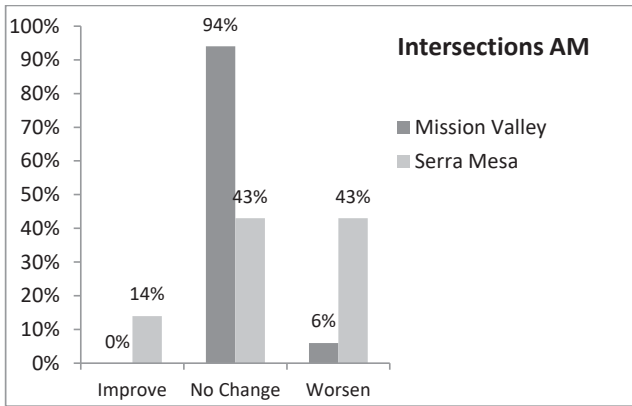
SERRA MESA COMMUNITY OPPOSITION

The surveys conducted in the community over the years indicate overwhelming opposition to the street connection. The Serra Mesa Planning Group and members of the community have repeatedly expressed strong opposition to the street connection in writing and in person at all stages of the development process for Quarry Falls/Civita, and continue to express their opposition to the proposed Community Plan Amendment.

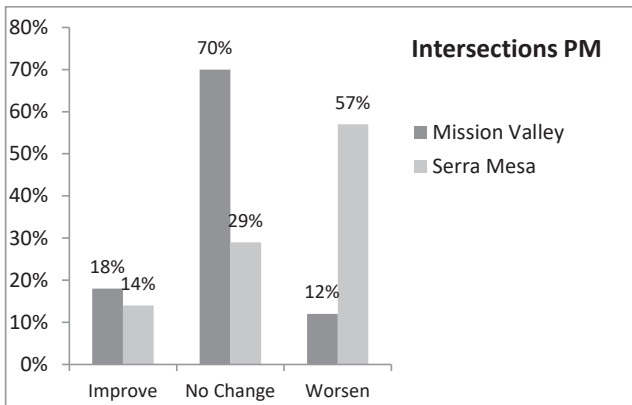
Analysis of the LOS Level Long-Term Baseline vs Long-Term Cumulative with Project*



In both Serra Mesa and Mission Valley the greatest percentage of the roadway segments will receive the same LOS level. Also, in Serra Mesa $\frac{1}{3}$ of the segments will worsen and none will improve.



The LOS No Change is almost 100% percentage for Mission Valley while in Serra Mesa both No Change and Worsen receive the same percentage.



In Mission Valley 70% of the intersections won't change LOS level while in Serra Mesa more than half of the intersections will worsen.

Conclusion: The road connection won't help most of the roadway segments and intersections in Mission Valley and will worsen ones in Serra Mesa.

*Charts based on Recirculated DEIR, Tables 5.2-16 and Table 5.2-17.

On-Ramps for Long-Term Without the Roadway Connection in Comparison to With (refer to Table 5.2.18)

- Murray Ridge I-805 NB on-ramp AM delay increases 9 min; queueing from 0 to 3,886 ft (.74 mi).
- Murray Ridge I-805 SB on-ramp PM delay increases 31 min; queueing from 2,407 to 10,368 ft (1.96 mi), beyond Sandrock.

Letter G: Serra Mesa Planning Group

G-1: This is an introductory comment that states that detailed comments are attached within the email. No specific comments that require a response are raised by this comment. Moreover, this comment does not address the adequacy of the DEIR.

G-2: This comment states that the Serra Mesa Planning Group (SMPG) reviewed the DEIR and states that it has far-reaching impacts. No specific comments that require a response are raised by this comment. Moreover, this comment does not address the adequacy of the DEIR.

G-3: This comment quotes an excerpt from the California Environmental Quality Act (CEQA) Guidelines concerning the recirculation of an EIR and states that the DEIR does not meet those portions of the State CEQA Guidelines.

Section 15088(f)(1)(g) of the CEQA Guidelines states the following (emphasis added): “When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, *summarize the revisions made to the previously circulated DEIR.*” The DEIR complied with this requirement. A summary of the revisions made to the previously circulated DEIR was provided in the Public Notice of Availability for Recirculation of an EIR and also within Chapter 3, *Project Description*: “After considering the comments received during the public review period, the City decided to analyze the road connection with a project-level analysis. The additional description and analysis warranted revisions to the draft PEIR, which in turn led the City to decide to replace the PEIR with a project-level EIR and recirculate for a second public review.” As the scope of analysis changed from a programmatic level (e.g., not including any specific roadway design, construction details) to a project level of analysis, the entire DEIR necessarily warranted revisions throughout to reflect that detail. Furthermore, the DEIR was in an entirely new format (e.g., font, numbering, figures) which would indicate that the entirety of the DEIR had been revised.

In addition, Section 15088(f) of the CEQA Guidelines states: “Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR.”

Section 15088(f)(1) is the first of these referenced approaches, which the City adhered to (as clearly indicated within the public notices and Chapters 1 and 3, Introduction and Project Description, respectively): “When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the FEIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.”

The DEIR was substantially revised and the entire document was recirculated. If only portions of the DEIR or the appendices were changed or revised, the City would have only recirculated those portions. After reviewing the comments received on the previously circulated EIR, the City noted that numerous commenters found the implementation of the project to be reasonably foreseeable,

and thus decided to substantially revise the DEIR with project-level analysis. Clarification has been added to Chapter 1, *Introduction*, of the FEIR. This information does not represent substantial new information or increase the severity of the impacts previously identified within the DEIR.

In addition, the comment states that Chapter 4 of the DEIR is an inadequate response to the comments submitted by the SMPG on the previous DEIR dated June 26, 2016. As noted in the “Public Notice of Availability for Recirculation of an Environmental Impact Report” and in conformance with Section 15088(f) of the CEQA Guidelines, the DEIR was substantially revised (i.e. the Program EIR was revised as a Project Level EIR) and therefore the City determined that reviewers must submit new comments on the DEIR. Therefore, although previous comments will be made a part of the administrative record, the previous comments do not require a written response in the FEIR.

Lastly, the comment states that specific questions and comments are listed and organized by topic. No revisions to the FEIR are warranted as a result of this comment. .

G-4: This comment excerpts a portion of the Mission Valley Community Plan (MVCP) referring to streets serving new development.

As discussed in Section 5.1.3, *Land Use*, of the DEIR, “...merely being inconsistent with an existing plan or regulation would not necessarily be considered a significant impact under CEQA; rather, the inconsistency must result in a substantial adverse effect on the environment.” CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans, but does not require a discussion of all the policies a project is consistent with. A project is considered inconsistent with the provisions of the identified regional and local plan if it would work in opposition to the attainment of the primary intent of the land use plan or policy. If a project is determined to be inconsistent with some objectives or policies of a land use plan, but is largely consistent with the land use goals of that plan and would not work in opposition to the attainment of the primary intent of the land use plan, the project could be consistent with the plan. In addition, an inconsistency with a specific objective or policy of a land use plan does not necessarily mean that the project would result in a significant impact on the physical environment.

As discussed in Section 5.1, *Land Use*, subsection 5.1.5, Impact Analysis, the project would not conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plans or other applicable land use plans. Relevant goals and guidelines from the City of San Diego General Plan and the Serra Mesa Community Plan were compared against the compatibility of the proposed project and its objectives, as the proposed project entails an amendment to the Serra Mesa Community Plan. As stated in Section 3.2.1 of the DEIR: Currently, there is a discrepancy between the Mission Valley Community Plan and Serra Mesa Community Plan regarding a roadway connection south from Phyllis Place. The Mission Valley Community Plan calls for a roadway connection and the Serra Mesa Community Plan does not include the connection on the roadway map (included in its Transportation Element).

Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states:

Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I 805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by

agreement between the City and the property owner at the time urban development takes place on these parcels.

The proposed project would generally implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan and the Serra Mesa Community Plan. Specifically, the proposed project is consistent with planning goals identified in the Mobility Element of the General Plan, as the roadway would balance the needs of multiple users of the public right-of-way by providing vehicle, bicycle, and pedestrian lanes/sidewalks. It is also consistent with the San Diego Association of Governments' (SANDAG) Regional Transportation Plan and is included within long-term forecast models. Moreover, it would provide a linkage within and between communities (Mission Valley and Serra Mesa) and would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route. Therefore, impacts were determined to be less than significant. No changes to the FEIR are warranted as a result of this comment.

G-5: This comment excerpts a portion of the MVCP referring to how many lanes Franklin Ridge Road should be limited to within the Quarry Falls development and states that the proposed roadway would be inconsistent with this designation.

The proposed roadway is not Franklin Ridge Road as it is indicated in the MVCP; it is a new unnamed roadway that would connect Phyllis Place to the intersection of Via Alta Road and Franklin Ridge Road. The MVCP is referring to the portion of Franklin Ridge Road that currently exists and runs from the connection with Via Alta Road to Quarry Falls Boulevard. Therefore, this policy does not apply to the proposed roadway. In addition, please see the response to Comment G-4. No changes to the FEIR are warranted as a result of this comment.

G-6: This comment excerpts a portion of the Mission Valley Community Plan referring to the orientation of development in Mission Valley.

The policy is referring to development of structures such as buildings, and not roadways (such as the proposed project). This is made more obvious when the policy states that it is development that is "accessed by roads." In addition, and most critically, as shown in Figure 24 of the Mission Valley Community Plan, the 150-foot contour line is on the south side of I-8 and therefore would not apply to the project site or the proposed project itself. In addition, please see the response to comment G-4. No changes to the FEIR are warranted as a result of this comment.

G-7: This comment states that emergency access exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive and that Kaplan Drive provides bicycle and pedestrian access.

This clarifying information has been added to the FEIR (see Section 5.2). The addition of this information does not affect the conclusions reached within the DEIR and no other clarifications are required.

G-8: This comment states the Quarry Falls developer has indicated they would fund the proposed roadway connection if approved, or if not approved, would make improvements to Mission Center Road as required by a mitigation measure for Quarry Falls.

Please see response to comment J-6 (Comment Letter J), which is a comment letter provided by Sudberry. Mitigation identified in the EIR for the proposed project is specific to the proposed project, which is a road connection between Mission Valley and Serra Mesa. Mitigation contained within the Quarry Falls Project EIR is specific to the Quarry Falls development, which assumed no

road connection in the final approved project. No changes to the FEIR are warranted as a result of this comment.

G-9: Please see the responses to comments G-4 through G-8, each of which provide responses to the comments raised.

G-10: This comment asks if other means of reconciling the community plans have been attempted.

As stated in Chapter 3, *Project Description*, as part of the actions by which it approved the Quarry Falls Project, the City Council initiated a resolution (Staff Recommendation Number 6) that directed City staff to analyze the inclusion of a street connection between Phyllis Place and Friars Road in the Transportation Element of the Serra Mesa Community Plan. The proposed project fulfills the direction provided by the City Council. No changes to the FEIR are warranted as a result of this comment.

G-11: This comment states that figures within the Quarry Falls PEIR and Specific Plan show a trail connection between the Quarry Falls development and the Phyllis Place Park. This figure has been added to the FEIR (see Figure 3-9 in Chapter 3). The addition of this information does not affect the conclusions reached within the DEIR.

G-12: This comment raises concerns regarding the analysis of the roadway grade, asks if a grading map for the roadway connection can be included, and asks for an explanation of the discrepancy in the maximum grade analysis between the DEIR for the proposed project and the Final PEIR for the Quarry Falls project. The commenter also requests a discussion of the roadway grade as it relates to ADA requirements.

The grading estimates are provided within Chapter 3, *Project Description*, of the DEIR and are based on preliminary engineering estimates. The grade of the roadway is conceptually designed to conform to the City's *Street Design Manual*, which states that the maximum grade is 7 percent. Figure 3-1 within Chapter 3, *Project Description*, of the DEIR show the project site and preliminary grading contours. If a deviation from the *Street Design Manual* is required, it would not require another permit or discretionary decision. The City's Traffic Engineering Department reviews the final design of the roadway for compliance with the *Street Design Manual* and other final engineering issues. Please see responses to comments F-4 and F-5 regarding pedestrian safety and pedestrian crossings. No changes to the FEIR are warranted as a result of this comment.

G-13: This comment refers to the Executive Summary and states that comments that apply to sections of the EIR may also apply to the Executive Summary.

This comment does not raise any issues regarding the adequacy of the DEIR. No revisions to the FEIR are warranted as a result of this comment.

G-14: This comment refers to the four questions posed by City Council as part of City Council Resolution # 304297 and asks why the questions were not the objectives, if the questions were answered in the DEIR, and where they were addressed in the DEIR.

The four questions needing resolution as set forth by the City Council within the amendment (Staff Recommendation Number 6) to the Quarry Falls project approval are detailed on page 3-2 of Chapter 3, *Project Description*, of the DEIR. The questions raised by City Council were not CEQA objectives for the proposed project, but were questions to which City Council requested answers. However, these four questions formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*. Each of these questions are answered within relevant

sections of the DEIR. The first and second questions are analyzed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR (see Section 7.7 for fire-rescue and police services; see Section 7.4 for emergency evacuation). The third question is analyzed in Chapter 9, *Alternatives*, as “Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative” (see Section 9.5.2). The fourth question is analyzed within Section 5.2, *Transportation and Circulation*, with the DEIR (see Section 5.2.8). No changes to the FEIR are warranted as a result of this comment.

G-15: This comment asks why changes were made to the project CEQA objectives that were included in the previous program EIR.

The objectives were modified to better reflect the basic objectives of the project. The changes to the objectives included a greater focus on multi-modal mobility and also reduced redundancy among the objectives. The City may modify project objectives prior to recirculating a DEIR. As noted on page 1-3 and as further clarified within the FEIR, the previous program-level analysis was revised and a project-level analysis replaced it. Changes to the previous program EIR were comprehensive and were made in response to the public comments received during public review for the program EIR; as such, the CEQA objectives were updated to better reflect the proposed project. No changes to the FEIR are warranted as a result of this comment.

G-16: This comment notes that the specific project objectives were not raised in the City Council Resolution 304297.

The questions raised by City Council were not CEQA objectives for the proposed project, but were questions to which City Council requested answers. As set forth in Section 15124(b) of the CEQA Guidelines, a statement of the objectives sought by the proposed project is required to be included within the Project Description section of an EIR. This section also states: “A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.” The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project, which is to provide a project that improves mobility between the Serra Mesa and Mission Valley Planning areas, improves regional access, improves emergency access and evacuation routes within the Serra Mesa and Mission Valley planning areas, provides safe and efficient multi-modal mobility, and resolves the inconsistency between the two community plans. The DEIR complied with CEQA’s requirements and the objectives are included within Section 3.1 of Chapter 3, *Project Description*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-17: This comment states that issues identified by staff, the public, or a decision maker should be analyzed. The specific comments follow this comment.

This is an introductory comment and indicates specific comments follow. Therefore, no response is necessary.

G-18: This comment refers to the project description and the existing emergency access and bicycle and pedestrian access provided at Kaplan Drive. The comment requests the criteria for analyzing and evaluating the improvement.

The FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2). The addition of this clarifying information does not affect the conclusions reached within the DEIR.

As detailed within Section 7.7 of the DEIR, in accordance with the City's CEQA Significance Determination Thresholds, the following issue provides guidance to determine potential significance of impacts on public services and facilities: "Would the proposed project have an effect upon, or result in a need for new or modified government services in, any of the following areas: fire/life safety protection; police protection; schools; maintenance of public facilities, including roads, parks, or other recreational facilities; and libraries?" As further detailed within Section 7.7, the proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for fire-rescue or police services.

The roadway connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection.

G-19: This comment asks how the DEIR determined there would a less-than-significant impact on aesthetics.

The potential impacts of the proposed project are analyzed within Section 5.9, *Visual Effects and Neighborhood Character*, specifically within Section 5.9.5. As detailed therein, within the context of the substantial development occurring at the Quarry Falls site and other existing development in the vicinity of the project site, the inclusion of a relatively small segment of roadway (460 feet long by 120 feet wide, which includes landscaping and pedestrian facilities in this width) would be minimally discernible from the surrounding area, particularly when viewed from the valley floor, and would be within the visual character of the existing urbanized area where vehicles are typically present—along the I-805, Phyllis Place, and roadways within the Quarry Falls development—to serve the existing development in these areas. The future presence of vehicles where there is currently a roadway and nearby freeway access would not represent a change in the existing visual character.

Moreover, the roadway would still permit the same amount of parkland along Phyllis Place. Finally, based on recent CEQA case law, changes in community character are considered a social and psychological issue and not an environmental issue subject to CEQA (*Preserve Poway v. City of Poway*, 245 Cal.App.4th 560). No changes to the FEIR are warranted as a result of this comment.

G-20: This comment asks, in terms of air quality, a) what the proposed grade would be for the road, b) whether the project would impact senior housing at the San Diego First Assembly of God, c) what the queuing time is for peak traffic times, and d) how much pollution can be expected.

The proposed roadway is anticipated to be designed in accordance with the City of San Diego's Street Design Manual, which permits a maximum grade of 7 percent. As stated in Table 5.2-11, no significant traffic delay would occur at the intersection of Phyllis Place and the proposed project roadway (referred to as Franklin Ridge Road in the table because the road is currently unnamed) and the intersection would operate at an acceptable LOS B with a total of 10-11 seconds of vehicle delay in 2017 and between 10-18.9 seconds delay in 2035. Please see Section 5.3, *Air Quality*, for a

detailed discussion of the potential significant impacts of the proposed project. As detailed in Section 5.3, the air quality analysis estimated pollutant concentrations at various receptor locations near the intersections that display the worst intersection conditions, and pollutant concentrations at all locations are expected to be far below pollutant standards. Based on the analysis contained in Section 5.3, impacts related to air quality were determined to be less than significant. No changes to the FEIR are warranted as a result of this comment.

G-21: This comment asks about the potential health risks to seniors living at the Senior Housing located at San Diego First Assembly of God, mentions that the DEIR does not mention existing emergency access at Kaplan Drive, and how much extra time is needed for emergency access if the project was not implemented.

Please see the responses to comments G-18 and G-20 above. Additionally, Table 5.2-23 in Section 5.2, *Transportation and Circulation*, of the DEIR details the changes in community access travel times with and without the proposed roadway connection. As demonstrated in Table 5.2-23, accessibility to a variety of public facilities and amenities such as hospitals, fire departments, and schools increases with the road connection.

G-22: This comment asks what benefits and impact with the Kaplan Drive emergency connection provide.

Please see the response to comment G-18 above. Kaplan Drive is not part of the proposed project; therefore, it was not analyzed in the impact analysis contained in the DEIR. However, the FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2). The addition of this clarifying information does not affect the conclusions reached within the DEIR. Although emergency access currently exists at Kaplan Drive, the San Diego Fire-Rescue Department confirmed that additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. Therefore, the proposed roadway connection would improve emergency access in the project area. Additionally, the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection.

G-23: This comment refers to land use compatibility impacts associated with converting general plan or community plan open space. The project site is not designated as open space by the General Plan or Community Plan. As detailed in Section 5.1.1.1 of the DEIR, the project site has a General Plan land use category of Residential. The project site is within the Serra Mesa and Mission Valley community plan areas. The Serra Mesa Community Plan designates the project site as “Low-Density Residential.” Within the Mission Valley portion, the project site is within the Quarry Falls Specific Plan area, which is designated as Multi-Use under the Mission Valley Community Plan. The adopted land use is correctly reflected as Residential in Figure 5.1-1 of the DEIR.

As described in the Plan Elements section of the Serra Mesa Community Plan, the first seven elements contain information on existing conditions and trends; problems and issues; and goals, objectives, and proposals. It is the Implementation Element, which establishes the realization and prioritization of the aforementioned plan items. Figure 17, Community Plan Land Use 1990, designates the project area for Residential Low Density (5-9 units net) and is consistent with the underlying RS-1-7 zone.

Figure 14, Environmental Management (Open Space), serves as a means of reference and information, and identifies areas within the community where open space policies apply. The proposed project is consistent with open space plan policies which allow for low-density urbanization through the residential low density land use designation and the implementation of the Environmentally Sensitive Land regulations.

Concerning the park proposed by the Quarry Falls developer, two General Development Plans for Phyllis Place Park have been approved: one that assumed the road connection would occur and one that did not. In either case, the acreage within the park would remain the same, and both areas would be considered part of Phyllis Place Park. Section 5.1, *Land Use*, of the DEIR, contains the relevant land use compatibility analysis regarding the proposed roadway and the proposed linear park. No changes to the FEIR are warranted as a result of this comment.

G-24: This comment identifies a policy in the Mobility Element of the General Plan that was not considered in the DEIR, and asks for a discussion of the proposed project's consistency with this policy. The commenter expresses the opinion that the proposed project would not be consistent with the cited policy.

The commenter cites Policy ME-F.2.a of the Mobility Element of the General Plan, which states the following: "Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and services important destinations." The proposed project would be consistent with this goal for several reasons. While bicycle access between the Civita development and the Serra Mesa community currently exists via Kaplan Drive, the proposed roadway connection would include Class II bike lanes that would connect to existing Class II bike lanes along Via Alta and Franklin Ridge Road to the south, and would also connect to existing Class II bike lanes along Phyllis Place to the north. As a result, the Class II bike lanes provided along the proposed roadway connection would create a continuous bikeway network consisting of designated bike lanes and would close a gap in the existing system, as well as serve an important destination (Quarry Falls) that includes residential and commercial land uses. Consequently, the proposed project would be consistent with Policy ME-F.2.a. Additionally, the proposed bike lane provided by the project is identified in the Bicycle Master Plan. As such, the project would also be consistent with this plan.

As detailed in Section 5.2, *Transportation and Circulation*, the proposed roadway connection would result in a potential safety hazard for vehicles entering or exiting City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. The DEIR concluded that this impact would be significant and unavoidable due to the uncertainty of being able to implement the mitigation measure necessary to reduce impacts to below a level of significance. However, this safety hazard only applies to vehicles entering or exiting City View Church and would not result in safety hazards for vehicles, cyclists, or pedestrians using the proposed roadway itself. Additionally, the proposed project would not remove existing bike lanes. As noted throughout Section 5.2, *Transportation and Circulation*, several mitigation measures identified in the section were assumed to not be implemented as they would likely require the removal of Class II bike lanes. For example, MM-TRAF-2 states:

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan,

and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

As such, the proposed project would not remove bike lanes and would be consistent with the policy identified by the commenter. No changes to the FEIR are warranted as a result of this comment.

G-25: The comment asks what criteria was used to determine the project's consistency with the General Plan. The proposed project's consistency with pertinent environmental goals, policies, and recommendations are provided in Table 5.1-1 and Table 5.1-2. The land use consistency analysis evaluates the proposed project against the recommendations of the policy and provides the rationale as to whether the project is consistent or is not consistent with the applicable plans, including the General Plan. Please also see the response to Comment G-4. As noted in the Land Use section of the DEIR, merely being inconsistent with an existing plan or regulation would not necessarily be considered a significant impact under CEQA; rather, the inconsistency must result in a substantial adverse effect on the environment. No changes to the FEIR are warranted as a result of this comment.

G-26: This comment includes questions about Table 5.1-1, Proposed Project's Consistency with the City of San Diego 2008 General Plan, and provides specific comments in Comments G-27 through G-50. Please see the responses to Comment G-4, G-5, G-6, and G-30 through G-50. As noted in the response to Comment G-4, CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with the applicable general plans, specific plans, and regional plans, but does not require a discussion of all the policies contained within the applicable plans in which a project is consistent.

G-27: The comment asks the City to consider an additional policy in the Mission Valley Community Plan. As stated within the DEIR, the transportation plan in the Mission Valley Community Plan includes a road connection between Mission Valley and Serra Mesa in the vicinity of the proposed project. The proposed project would be consistent with the plan. Moreover, the proposed project would connect new (and older) development in Mission Valley to a road network that provides better local and regional access including Serra Mesa and other communities to the north, and the I-805 Freeway. In addition, please see the response to comment G-4.

G-28: The comment asks the City to consider an additional policy in the Mission Valley Community Plan. This comment was raised previously under comment G-5; please see the response to that comment.

G-29: The comment asks the City to consider an additional policy in the Mission Valley Community Plan. This comment was raised previously under comment G-6; please see the response to that comment.

G-30: The comment is a statement that Mission Center Road is a direct connection from Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley. This comment does not raise any issue regarding the adequacy of the DEIR.

G-31: The comment is a statement that Mission Center Road and Mission Village Drive provide linkages between Serra Mesa and Mission Valley. This comment does not raise any issue regarding the adequacy of the DEIR.

G-32: The comment asks how the project meets a General Plan goal of achieving congestion relief. Please refer to Table 5.1-1. The proposed project, if implemented, would provide more direct access to regional freeways and businesses, which would generally alleviate traffic congestion on neighborhood streets, but would see a rise in delay at certain areas near freeway ramps as the project would open up access to additional ramps. Overall, the project would improve community access in the Serra Mesa community and the Mission Valley community and would better distribute future traffic in the area. Specific areas of vehicle congestion relief are discussed in the traffic report (see Appendix C) and Section 5.2, *Transportation and Circulation*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-33: The comment states the opinion that the primary purpose of the project is access to I-805 and asks for an explanation for how this meets the Mobility Element goals and policies cited in the comment.

While improved regional access would be a benefit of the project, it is only one of the project objectives. In addition to improving regional access, the project objectives also include improving mobility between the Serra Mesa and Mission Valley Planning areas, improving emergency access and evacuation routes within the Serra Mesa and Mission Valley planning areas, providing safe and efficient multi-modal mobility, and resolving the inconsistency between the two community plans.

The Mobility Element goal cited by the commenter states the following: “Safe and efficient street design that minimizes environmental and neighborhood impacts.” The comment also cites excerpts from Mobility Element policy ME_C.3.b. regarding “choices of routes to neighborhood destinations” and “designed to control traffic volumes.” The proposed roadway has been conceptually designed to be consistent with the City’s Street Design Manual. The proposed roadway would be classified as a four-lane major street, which is defined in the Street Design Manual as a street that carries moderate-to-heavy vehicular movement. The proposed roadway connection has been adequately designed to accommodate the projected traffic volumes that would be redistributed onto the new roadway. In addition, the manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. During final design of the proposed roadway, the City will determine whether traffic-calming measures are necessary to ensure safe roadway operating speeds and pedestrian/bicyclist safety. The project has also been conceptually designed to avoid neighborhood and environmental impacts to the extent feasible and would provide an additional route to neighborhood destinations, such as parks, commercial facilities, and the potential future school that will be constructed within Quarry Falls. Please also refer to Table 5.1-1, Policy UD-B.5. The proposed project is designed to City standards to ensure appropriate and safe speeds. No changes to the FEIR are warranted as a result of this comment.

G-34: The comment states that a minimum of one trail connection will occur between Serra Mesa and Quarry Falls in Mission Valley for pedestrians and bikers. The proposed project would not preclude the implementation of a trail connection between Serra Mesa and Quarry Falls. No changes to the FEIR are warranted as a result of this comment.

G-35: This comment was raised previously as Comment G-18. Please see the response to comment G-18. The project would not conflict with current emergency access provided at Kaplan Drive.

G-36: This comment was raised previously as Comment G-18. Please see the response to comment G-18. The project would not conflict with current bicycle and pedestrian access provided at Kaplan Drive.

G-37: The comment raises the issue that the proposed park would be split by the proposed roadway and how this could potentially result in safety issues for children playing ball, as well as the potential effects on aesthetics.

As detailed in Chapter 3, *Project Description*, Phyllis Place Park is a proposed linear park that would be located on the southern side of Phyllis Place. It would be a 1.33-acre linear park for passive use activities; not an “active” park with large amounts of open space and would generally not be suitable for active recreational activities. As shown in Figure 3-5a of the DEIR, there are two relatively small children’s play areas that would be centrally located within the western segment of Phyllis Place Park, approximately 300 feet to the west of the proposed roadway intersection. The intersection would be designed in accordance with the Street Design Manual and would include pedestrian crossings. The potential for safety issues associated with the proposed project is detailed in Section 5.2, *Transportation and Circulation*.

The commenter states the opinion that splitting the park in two with a roadway would impact the park aesthetically. The DEIR acknowledges that the proposed project would divide the park; however this would not represent a significant impact related to aesthetics. The park has not yet been constructed. Although the park would be slightly interrupted in continuity, this would not represent a significant impact related to aesthetics. No changes to the FEIR are warranted as a result of this comment.

G-38: The proposed roadway is anticipated to be designed in accordance with the City’s Street Design Manual, which may result in up to a 7 percent grade. The grade of the roadway, as proposed, would not have any bearing on emergency access, and there is no requirement under CEQA to compare the proposed project to another location that also provides emergency access under the existing condition. The design of the project is conceptual; however, compliance with the Street Design Manual would ensure proper ADA requirements are met, as well as any potential requirements for mass transit (such as buses). Concerning the comment regarding traffic waiting times, the LOS under the proposed roadway connection is detailed throughout Section 5.2, *Transportation and Circulation*. The comment speculates that potential mass transit, such as buses, would be queued and that it would not be feasible for the buses to stop on the proposed grade. There is no transit route identified for the proposed roadway connection as it would require planning by MTS. In the event that a bus route is identified, the conceptual design of the roadway complies with the Street Design Manual, and the roadway therefore would need to be designed appropriately to support the operational needs of a bus route. The proposed roadway connection and its relationship to the proposed Phyllis Place Park is detailed within Sections 5.1, *Land Use*, and 5.2, *Transportation and Circulation*. No changes to the FEIR are warranted as a result of this comment.

G-39: This comment requests information pertaining to the safety of a trail as compared to the safety of a Class II bike lane. Implementation of a Class II bike lane would not preclude implementation of a bike trail in the vicinity. The Class II bike lane would be designed in accordance with the City’s Street Design Manual to ensure proper widths and design specifications. Alternative transportation is analyzed within Section 5.2, *Transportation and Circulation*, within the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-40: The comment indicates that the proposed project would not represent a transportation improvement to existing Serra Mesa development and states the opinion that it would not provide improved access times or benefit for the walking community.

Please see response to comment F-4 regarding pedestrian safety and pedestrian connections. In addition, as detailed in Section 5.2, *Transportation and Circulation*, the proposed project would include sidewalks along both sides of the roadway, thus allowing a dedicated pedestrian connection between the Mission Valley and Serra Mesa communities in the vicinity of Phyllis Place. The proposed project would therefore increase pedestrian connectivity between communities. Please also see Table 5.2-23 of Section 5.2, which provides the changes in community access travel times to various public facilities and amenities. As demonstrated in Table 5.2-23, accessibility to a variety of public facilities and amenities increases with the road connection. This comment represents the opinion of the commenter, but does not address the adequacy of the DEIR. This comment does not raise any issue regarding the adequacy of the DEIR.

G-41: The comment asks how the project would maximize public views of Mission Valley once the project is complete. The proposed roadway would provide access for pedestrians and cyclists using the park that is proposed as part of the Quarry Falls development. These users would be able to access the viewshed from the park. No changes to the FEIR are warranted as a result of this comment.

G-42: The comment asks how the roadway would reduce traffic congestion. The proposed roadway does not reduce congestion at every location studied within the traffic impact study area. Rather, the proposed project would provide more direct linkages between Serra Mesa and Mission Valley and would allow additional options for regional access via the freeway system. This results in fewer Vehicle Miles Traveled (VMT), thus overall reducing greenhouse gas (GHG) and air quality emissions, and diverting some vehicle trips from other roadways and ramps that are or will be substantially congested in the future, all of which is discussed within the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-43: The comment states an additional policy related to designing new connections and removing barriers to pedestrian and bicycle circulation.

As detailed in Section 5.2, the proposed project would provide bicycle connectivity from Phyllis Place southward to Via Alta and Franklin Ridge Road. The proposed project would therefore increase bicycle network connectivity between the Serra Mesa and Mission Valley communities and thus would not conflict with overarching goals and policies of transit plans to provide balanced and safe bicycle networks within and between communities. Additionally, proposed project would include sidewalks along both sides of the roadway, thus allowing a dedicated pedestrian connection between the Mission Valley and Serra Mesa communities in the vicinity of Phyllis Place. The proposed project would therefore increase pedestrian connectivity between communities. The comment does not raise any issues regarding the adequacy of the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-44: The comment asks how the increase in average daily trips along Phyllis Place would meet a goal about minimal excessive motor vehicle noise on residential and other noise-sensitive land uses. The comment also cites text from the Noise Element of the General Plan related to promoting alternative transportation modes to influence daily traffic volumes and reduce peak hour traffic.

No significant operational noise impacts due to the proposed project were identified (see Section 5.4, *Noise*). The comment also identifies a policy from the Noise Element that the City can influence daily traffic volumes by encouraging alternative transportation modes. Please see response to comment G-40 and G-43 regarding the improvements to pedestrian and bicycle connectivity as a result of the project. Additionally, as detailed in Section 5.2, the proposed roadway connection

would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. No changes to the FEIR are warranted as a result of this comment.

G-45: The comment asks for a description of how transit services would become more readily available to Serra Mesa residents. The commenter states that bus service is available on Murray Ridge Road and trolley access is available via Mission Center Road, and states that a majority of Serra Mesa residents live closer to Mission Center Road.

The proposed roadway would provide the Serra Mesa residents living west of the proposed roadway connection with an additional connection southward to Mission Valley, where existing MTS trolley service exists (see Section 2.3.2 of the DEIR). This would help to reduce the overall travel distances from these residences to the Mission Valley trolley stations. Specifically, the proposed roadway connection would provide an additional connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Additionally, the proposed roadway could provide for a bus route connection from Serra Mesa to the existing trolley stops at Rio Vista or Mission Valley Center; however, the bus routes are planned, owned, and operated by MTS and any new route would need to be implemented by MTS. No changes to the FEIR are warranted as a result of this comment.

G-46: The comment asks how the design will meet the Street Design Manual's design specifications.

The proposed roadway would be designed in accordance with the Street Design Manual, as detailed throughout Chapter 3, *Project Description* of the DEIR. Please refer to Section 3.3.1, as well as Figures 3-7 and 3-8. No changes to the FEIR are warranted as a result of this comment.

G-47: The comment asks to discuss the pedestrian crossing at the roadway to access the west and east sides of the park and states the opinion that the roadway would constitute a barrier.

Please see response to comment G-23. Two General Development Plans for Phyllis Place Park have been approved: one that assumed the road connection would occur and one that did not. As detailed in Chapter 3, *Project Description* and analyzed in Section 5.1, *Land Use*, the project would split the park into two parks and would retain the same acreage (1.33 acres). While the park would be physically bisected, similar amenities would be provided in each segment of the park, as depicted on Figure 3-5a of the DEIR. The amenities provided in both segments of the park include, but are not limited to, interpretive gardens, a meandering pedestrian pathway, and fitness areas. The proposed intersection would include a crosswalk for pedestrians and would allow access by pedestrians and bicyclists using the proposed roadway coming from Mission Valley or already within Serra Mesa to access both segments of Phyllis Place Park. As the project would include pedestrian and bicycle facilities, including an intersection crossing, the project would not create a barrier between the east and west portions of the park as stated by the commenter. No changes to the FEIR are warranted as a result of this comment.

G-48: The comment asks the City to consider additional policies in the General Plan Mobility Element. The proposed roadway do not conflict with the policies referenced by the commenter. The proposed roadway would not significantly detract from the existing neighborhood character as it would provide a roadway with landscaping and design features that tie into the Quarry Falls development to blend in a coordinated manner with the existing development. Furthermore, it would serve to connect two communities (Serra Mesa and Mission Valley) that currently do not have a direct connection at this location. The proposed roadway has been conceptually designed to

minimize disturbances to the natural landform to the extent feasible and mitigation is required to ensure the final hillside design creates natural contours to mimic the surrounding hillside. Moreover, the proposed project would not result in any significant operational noise impacts. Please see the response to Comment G-4. No changes to the FEIR are warranted as a result of this comment.

G-49: The comment states an excerpt from the Transportation Demand Management section in the Mobility Element related to improving the performance and efficiency of the street and freeway system by means other than roadway widening or construction. The comment asks for a discussion of the reasons supporting construction of the proposed roadway and widening mitigation measures rather than improving existing streets.

Please see the response to comment G-4. As set forth in Section 15124(b) of the CEQA Guidelines, the statement of objectives should include the underlying purpose of the project. The objectives of the proposed project are described in Chapter 3, *Project Description*, of the DEIR. As detailed in Chapter 3, one of the project objectives is to resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. The proposed roadway connection would achieve this project objective, as it would provide a linkage within and between these communities and would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route. The significant transportation and circulation impacts resulting from the proposed roadway would in turn require other roadways such as Phyllis Place to be widened to mitigate project impacts. However, Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan; therefore, the widening would be consistent with the Community Plan. Additionally, as detailed in Section 5.2, some of the proposed mitigation measures identified for significant project impacts would conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). As a result, the analysis did not assume that these mitigation measures would be implemented. No changes to the FEIR are warranted as a result of this comment.

G-50: The comment quotes the Final PEIR for the Quarry Falls project's Statement of Overriding Considerations and indicates the Quarry Falls project emphasizes walkability.

The proposed project consists of a roadway connection with pedestrian and bicycle facilities. Although the project would increase traffic within the Quarry Falls area, no significant impact regarding pedestrian hazards was identified within the DEIR and the project would improve pedestrian connectivity in the project area, providing access between Serra Mesa and Mission Valley. Please see response to comment F-2, F-4, and F-5 regarding pedestrian safety and pedestrian circulation. No changes to the FEIR are warranted as a result of this comment.

G-51: The comment indicates that specific comments that follow are based on the Table 5.1-2 in the DEIR. The first specific comment mentions retention of the residential character of Serra Mesa and states the ADTs listed in the DEIR. Please see the response to comment G-4. The comment represents the opinion of the commenter, but does not raise an environmental issue that requires a response. The proposed roadway is not located within a residential area within Serra Mesa, but is a connection to an existing roadway in Serra Mesa that leads to the I-805 ramps. No changes to the FEIR are warranted as a result of this comment.

G-52: The comment provides an opinion about the roadway connection causing an impact by splitting the park. Please see the response to comment G-4. The comment represents the opinion of

the commenter. The impacts to the hillside are adequately analyzed in Section 5.9, *Visual Effects and Neighborhood Character*. No changes to the FEIR are warranted as a result of this comment.

G-53: The comment mentions emergency access is provided via Kaplan Drive. This comment is similar to Comment G-7 and G-18. Please see the responses to Comments G-7 and G-18. This comment does not address the adequacy of the DEIR.

G-54: The comment indicates that Kaplan Drive provides bicycle and pedestrian facilities. This comment is similar to Comment G-18; please see the response to that comment. This comment does not address the adequacy of the DEIR.

G-55: This comment is similar to Comments G-34 and G-39; please see the responses to those two comments. This comment does not address the adequacy of the DEIR.

G-56: This comment identifies a policy of the Serra Mesa Community Plan that indicates the transportation system should be a safe, balanced, and efficient. The DEIR analyzes environmental impacts associated with the proposed project. Please refer to Table S-1 of the DEIR for a summary of impacts and mitigation measures. Significant and unavoidable impacts would occur on transportation systems because of the growth associated with buildout of the community plans through 2035. Note that the proposed project would not create any additional vehicle trips, but would redistribute trips and lead to lower vehicle miles and lower GHG emissions than under the No Project Condition. No changes to the FEIR are warranted as a result of this comment.

G-57: This comment indicates Phyllis Place would be widened. Please see the response to Comment G-49. No changes to the FEIR are warranted as a result of this comment.

G-58: The comment provides an opinion that splitting the park into two sections would create a safety issue and will be an aesthetic impact. This comment is similar to G-37 and G-52. Please see the responses to comments G-4, G-47, and G-52. No changes to the FEIR are warranted as a result of this comment.

G-59: This comment asks if the road connection would traverse designated open space.

This comment is similar to Comment G-23; please see the response to that comment. The bisecting of Phyllis Place Park as a result of the proposed roadway connection would not require any expansion into open space in order to maintain the approved size of the park (1.33-acres), nor would the widening of Phyllis Place. None of the area referenced by the comment that is south of Phyllis Place is designated as open space, as previously mentioned in the response to Comment G-23. Please refer to Figure 3-5a; the park has been designed with the widening of Phyllis Place in mind if the proposed project were to be approved. No changes to the FEIR are warranted as a result of this comment.

G-60: This comment provides additional objectives of the Serra Mesa Community Plan. The comment is similar to comments G-23, G-47, G-48, and G-52 and indicates open space should be preserved and steep hillsides should be retained in their natural state. Please see the responses to comments G-23, G-47, G-48, and G-52. In addition, the existing hillside is undeveloped and primarily disturbed. No changes to the FEIR are warranted as a result of this comment.

G-61: This comment provides an overview of the traffic analyses prepared for the project and generally expresses concerns regarding traffic count data. It asks that if the traffic data is deemed to be “too old,” whether a new study will be conducted to reflect the new data.

Traffic data does not require updating and is not outdated. Traffic counts were collected between June 2011 and June 2013 by Metro Counts and True Counts (2 data collection companies). The data was validated and confirmed to be relevant by KOA Corporation (Katz, Okitsu & Associates) in June 2013. As documented on Page 12 of the Franklin Ridge Road Connection Traffic Impact Study by KOA Corporation (KOA TIS), the traffic patterns between 2011 and 2013 were shown to either stay approximately the same or decrease. Thus, the counts are still valid and were utilized for the existing conditions analysis in 2013. A comparison of the counts between 2011 and 2013 is also provided in Appendix E of the KOA TIS. As shown in Appendix B of the KOA TIS, all traffic counts were conducted during a time when the San Diego Unified School District was in session, on a typical weekday (Tuesday-Thursday).

The recirculated DEIR Traffic Study by Chen Ryan Associates (Chen Ryan TIS Summary) obtained all information from the KOA TIS, as stated on page 1 of the Serra Mesa Community Plan Amendment Street Connection Technical Report by Chen Ryan Associates. No additional traffic counts were taken for the recirculated DEIR, nor was an update necessary because near-term conditions were also present.

Specifically, the recirculated DEIR determined the Near-Term Year 2017 is the appropriate baseline to compare the “with” and “without” project scenarios as was detailed within the first page of Section 5.2, *Transportation and Circulation*, of the DEIR:

There were two relevant CEQA cases addressing the types of scenarios to be analyzed and included in an EIR: (1) *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (6th Dist. 2010) 190 Cal.App.4th 1351 (Sunnyvale West), and (2) *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 5 Cal. 4th 439 (Neighbors). The decision in the first CEQA case indicated that changes associated with a project should be compared to the existing conditions baseline only to establish project-related impacts, which generally is the time the Notice of Preparation is issued. However, the California Supreme Court ruled in the second case that a future year baseline can be justified if substantial evidence in the administrative record supports a conclusion that an analysis based on existing conditions would be misleading or without informational value to decision-makers and future users of the EIR.

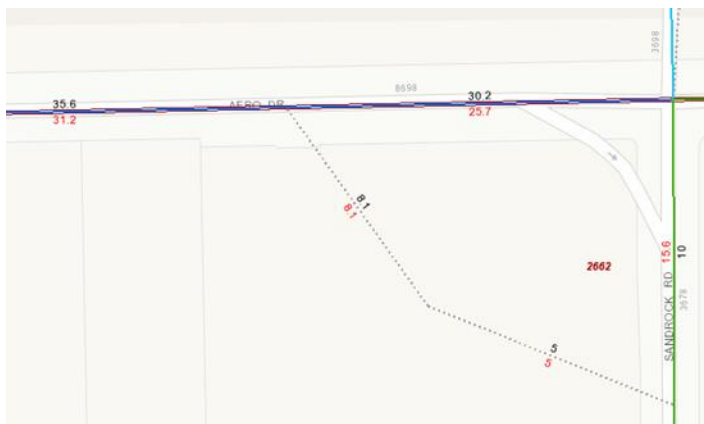
As previously detailed in Chapter 2, *Environmental Setting*, traffic counts were collected in 2011 and verified in 2013 to represent the existing conditions. However, consistent with the Neighbors decision, the existing conditions are provided for informational purposes and are not used to determine project-related impacts. Rather, the impact analysis uses the reasonably foreseeable near-term traffic conditions modeled for the Near-Term Scenario (Year 2017) as the baseline. This is a more conservative and more accurate approach than using the existing conditions because the Near-Term Scenario takes into account projects that have been implemented since 2013. In addition, it is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented. If the existing conditions were used in place of the future near-term conditions, projects that are under construction, planned for construction, or otherwise recently operational would not be factored into the project impact analysis. Accordingly, consistent with the Neighbors decision, traffic conditions for the Near-Term Scenario are considered the near-term baseline conditions for CEQA purposes and are used as a basis for determining project-related traffic impacts.

Therefore, the traffic counts used in the traffic analysis were valid and the DEIR adequately detailed the methodology and reasoning as to why the Near-Term Scenario is a logical method for determining impacts. No revisions to the FEIR are warranted as a result of this comment.

G-62: This comment asks questions regarding the Near-Term traffic data.

Traffic volume development for Near-Term Year 2017 conditions was accomplished in several steps. The first step utilized regional modeling and is a function of expected land development and economic activity. City staff worked with SANDAG and its computerized travel forecast model called Series 12. Under Series 12, traffic volumes within the study area are generated by land uses. City staff also then accounted for all known and proposed development projects using a list of known approved projects that might not otherwise have been factored into the original land uses and model due to the time that elapsed between original modeling and project completion (i.e., staff obtained a list of cumulative projects and checked each one to see if it would add substantial traffic to the project study area).

The complete list of projects that were evaluated to determine whether they will contribute traffic to the project study area are provided as Attachment A to these response to comments. Further, regional land use that included regional growth from the SANDAG Series 12 Year 2020 model was assumed for all other communities. For example, the SANDAG Series 12 Year 2020 model assumed that 412 multi-family dwelling units would be constructed on the Broadstone Corsair project site within the Kearny Mesa community. A screen shot of the land use assumption for TAZ 2662 (Broadstone Corsair project site) is provided below. Roadway assumptions for the Near-Term Year 2017 scenarios are provided in Chapter 4 of the KOA TIS.



TAZ 2662 Location



Final 2050 Regional Transportation Plan
 San Diego Regional Traffic Forecast Information Center
 Trip Generation and Land Use by Zone - Year: 2008
 Traffic Analysis Zone: 2,662

Land Use Code	Description	Type	Amount	Person Trips	Vehicle Trips
102	MULTI-FAMILY	du	0	0	0
2101	INDUSTRIAL PARK	acre	18.5	2,621	2,163
4112	RIGHT-OF-WAY	acre	0.9	0	0
6002	LOW RISE OFFICE	acre	10.9	6,425	5,270
9702	MIXED USE 67% STREETFRONT	acre	0	0	0
TOTAL				9,046	7,433
LOADED VEHICLE TRIPS					7,251

SANDAG Series 12 Year 2020 land use assumption – TAZ 2662

Under the Year 2035 scenario, regional land use in the SANDAG Series 12 Year 2035 model was assumed with adjustments made to reflect additional projects that are constructed or approved within the study area vicinity. The SANDAG Series 12 Year 2035 model roadway network was also customized to reflect the correct roadway changes in the project study area. Roadway network assumptions for the Year 2035 scenario are documented in Chapter 6 and Appendix E of the KOA TIS. These roadway assumptions include the completion of the SR-163 Friars Interchange improvements and construction of Franklin Ridge south of Via Alta, in addition to other improvements planned to be operational prior to 2035. Please refer to Appendix E of the KOA TIS for model roadway assumptions.

It is a standard engineering practice to keep the SANDAG regional model roadway network outside of the project study area. Within the study area, the roadway network and cross sections were closely examined. In the case of Sandrock Road and Murray Ridge Road, the network assumption took a more conservative approach by assuming the larger classifications identified in the Serra Mesa and Mission Valley community plans; this approach prevents potential traffic diversion from these two roads that might occur if they were not upsized in the model. No revisions to the FEIR are warranted as a result of this comment.

G-63: The data collected in 2011 and/or 2013 is not directly used as the basis for the Near-Term data; therefore, these questions do not apply to the adequacy of the DEIR.

G-64: This comment is similar to comments G-62 and G-63. Please see the responses to those comments.

G-65: This comment is similar to comments G-62 and G-63. Please see the responses to those comments. Further, to detail the differences in traffic studies: In 2015 KOA Corporation completed the original traffic impact report. Subsequently, in 2016 Chen Ryan and Associates augmented the report to summarize near-term conditions in the body of the report, which were previously only in the appendix to the KOA report. This did not necessitate any new analysis or alteration to the analysis, simply a difference in scenario comparison.

G-66: This comment asks how the project traffic data compares to the data collected for the first phase of the Quarry Falls project.

Both the Quarry Fall FEIR/TIS and this project traffic study were conducted using the *City of San Diego Traffic Impact Study Manual*. The primary difference between the two projects is the purpose

of each project as well as the amount of trip generation or re-routing due to each project. The purpose of this study is to determine the impact of the proposed roadway connection, which is expected to provide a shorter driving distance for local trips. As shown in Appendix C of the recirculated DEIR, under the Long-Term Year 2035 with Project scenario (Table 4.1), the proposed roadway connection would carry approximately 34,100 ADT. Whereas in comparison, the Quarry Fall Development is a new land use development, which is projected to generate approximately 66,300 ADT (Table 5.2-6 of the Quarry Fall FEIR). Due to these factors, the Quarry Fall FEIR covers a larger study area. No changes to the FEIR are required in response to this comment.

G-67: This comment asks if data collected for the traffic study considers the activities of City View Church. Standard traffic engineering practices do not include special events within the context of traffic impact studies on development project, such as large sporting events or church services, as these events do not generate traffic on a daily basis and/or do not affect peak traffic periods. Since the recirculated DEIR's purpose is to determine the impact of the roadway connection project and not the impact of sporting events or church events, event specific traffic was not analyzed as a part of this effort. No revisions to the FEIR are warranted as a result of this comment.

G-68: This comment expresses concerns regarding pedestrian safety as it relates to schools and additional traffic.

Regarding pedestrian safety, internal circulation within Civita was developed as part of the Quarry Falls project, including the locations of signalized, designated pedestrian crosswalks. Existing signalized, designated pedestrian crosswalks are located at the intersection of Via Alta and Franklin Ridge Road and the intersection of Via Alta and Civita Boulevard. As discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, the proposed roadway and access points have been conceptually designed to be consistent with the City's Street Design Manual (2002). The City's Street Design Manual contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way and for the safe design of intersections. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the Street Design Manual. During final design of the proposed roadway, the City will determine whether traffic-calming measures are necessary to ensure pedestrian safety. As such, the proposed roadway connection does not include any design features that would create hazardous conditions for pedestrians and bicyclists. In addition, the project does not propose any changes to the existing designated pedestrian crossings within Civita.

Regarding the commenter's concerns surrounding the potential future school at Via Alta and Civita Boulevard, the suitability of the potential school site would be evaluated by the California Department of Education, which is the agency that approves new school sites. The California Department of Education considers several criteria prior to approving a new school site, including, but not limited to, the site's accessibility from arterial roads and location relative to major arterial streets with heavy traffic patterns (Title 5, Section 14010, CCR). No revisions to the FEIR are warranted as a result of this comment.

G-69: This comment is similar to comment G-62, please see the response to that comment. Further, since the SR-163/Friars Road interchange is scheduled to begin Phase 1 construction in 2017, it is reasonable to expect that the project would not complete construction by the end of 2017, and

therefore, was not included in the 2017 roadway network. No revisions to the FEIR are warranted as a result of this comment.

G-70: The commenter asks why the intersection of Mission Center Road and Sevan Court was not included in the Traffic Impact Study (TIS) study area. The commenter indicates that there are concerns at this intersection that should be considered and analyzed in the EIR.

The project study area consists of 29 roadway segments, 24 intersections, 3 freeway mainline segments, and 2 metered freeway ramps. This area is bordered generally by Aero Drive to the north, Rio San Diego Drive to the south, and Mission Center Court and Northside Drive to the west and east, respectively.

The project study area was determined using a methodology consistent with the *City of San Diego Traffic Impact Manual*. The study area methodology is further described in Appendix D of the KOA Corporation Traffic Impact Study (KOA TIS). The intersection does not meet the criteria for addition into the study area. The appendix details a diverted trip methodology. No changes to the FEIR are required in response to this comment.

G-71: This comment asks why freeway off-ramps were not analyzed in the traffic study. Freeway off-ramp analysis does not exist; all freeway off-ramps are analyzed as analysis of the adjoining intersection. For example, intersections 14 and 15 are the Murray Ridge Road and I-805 northbound ramp and southbound ramps, respectively (see, for example, Table 5.2-11 of the DEIR). No revisions to the FEIR are warranted as a result of this comment.

G-72: This comment states that Sandrock Road became a two lane collector with a continuous center lane in 2014 and asks if the near-term conditions account for the change of Sandrock from four to two lanes. As shown in Table 5.2-10 of the DEIR, Sandrock Road was analyzed as a 2-lane Collector with Continuous Left-turn Lane. No revisions to the FEIR are warranted as a result of this comment.

G-73: This comment is similar to comment G-62; please see the response to that comment.

G-74: This comment states that the previously circulated PEIR included the roadway segment of Friars Road between River Run and Fenton Parkway and asks why this segment has been removed from the DEIR. As shown in Table 5.2-10, the recirculated DEIR study includes Friars Road, from Qualcomm Way to Fenton Parkway, which includes the segment between River Run and Fenton Parkway. No revisions to the FEIR are warranted as a result of this comment.

G-75: This comment asks if an assessment or survey was made of the traffic patterns and activity of residents within Civita. The traffic analysis in the project TIS and DEIR correctly account for the units built by Civita. This comment does not raise issues concerning the adequacy of the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR.

G-76: This comment is similar to comment G-67; please see the response to that comment.

G-77: This comment expresses concerns regarding classifications of roadways. This roadway segment is correctly reflected in the recirculated DEIR. The 2-lane Collector (multi-family) roadway classification represents collectors that provide direct access to multi-family development driveways such as Westside Drive. No revisions to the FEIR are warranted as a result of this comment.

G-78: This comment expresses concerns regarding the appendix of the Traffic Impact Analysis. The Synchro Analysis worksheet for Via Alta & Franklin Road for the Year 2035 with Project scenario is included in Appendix C of the TIS and labeled as "51: Via Alta &." This differentiation does not affect the analysis results. No revisions to the FEIR are warranted as a result of this comment.

G-79: This comment expresses concern regarding the roadway network. An improvement from another project cannot be assumed as in-place until it is either on the ground or fully funded. Please also refer to the response to comment G-62. No revisions to the FEIR are warranted as a result of this comment.

G-80: This comment is similar to comment G-70; please see the response to that comment.

G-81: This comment expresses concern regarding the Freeway Ramp Analysis.

The KOA TIS analyzed (ramp metering analysis) both the I-805 Northbound and Southbound On-Ramps during both the AM and PM peak hours; this analysis shows there would be a delay of 43 minutes during the PM peak hours at the I-805 Northbound On-Ramp. However, this ramp meter is currently not activated during the PM peak hour. Therefore, this ramp metering analysis was not included in the Serra Mesa Community Plan Amendment Street Connection Technical Report by Chen Ryan Associates, reflecting existing conditions. In communication between City and Caltrans staff, it was agreed that conducting the Northbound PM analysis was unnecessary due to the unlikelihood of the meter operating for this scenario in the future. Thus, the Chen Ryan Associates Technical Report only evaluated the ramp meters during the time period when the ramp meter is expected to be on under existing and future conditions. No revisions to the FEIR are warranted as a result of this comment.

G-82: This comment is similar to comment G-81; please see the response to that comment.

G-83: This comment expresses concern regarding the two versions of the traffic impact studies.

The KOA TIS contains a typographic error; however this only occurs in the KOA TIS and not in Section 5.2 of the DEIR. This does not affect the analysis results. No revisions to the FEIR are warranted as a result of this comment.

G-84: This comment expresses concern regarding accuracy of data in Table 5.2-8 in terms of freeway segment LOS under existing conditions.

The freeway segment LOS criteria provided in Table 5.2-7 of the DEIR is incorrect and is not consistent with the freeway segment LOS criteria in Table 1.5 of the Traffic Study (Appendix C). The LOS freeway segment criteria have been revised in Table 5.2-7 of the FEIR to be consistent with the criteria in Appendix C (See Section 5.2). As a result of these revisions, the existing LOS in Table 5.2-8 for the three freeway segments identified by the commenter is correct. Therefore, these revisions do not affect the analysis results. FEIR

G-85: This comment expresses concern regarding roadway analysis results for Phyllis Place between Abbotshill Road and Franklin Ridge Road. The roadway analysis shown in the DEIR was correctly evaluated based on the City of San Diego Traffic Impact Study Manual. Further, mitigation is proposed for the segment which is shown to be affected, and referenced in the comment. No revisions to the FEIR are warranted as a result of this comment.

G-86: This comment expresses concern regarding intersection analysis and evaluation of pedestrians. The DEIR correctly analyses and discloses the impacts associated with the road

connection on the study intersections. No revisions to the FEIR are warranted as a result of this comment.

G-87: Traffic Analysis Zones or TAZs are geographical areas in the SANDAG model that contain land use information, i.e., land uses or neighborhoods that would generate traffic. Freeway mainlines, roadways, and other transportation facilities are considered to be "links" that carry the trips generated by these TAZs.

As documented in Appendix H of the recirculated DEIR, the influence area is defined as all TAZs where the project may generate an increase or decrease of 500 or more average daily trips (ADT), as opposed to the TIS which only evaluates and assesses potential traffic impacts. TAZs are geographic traffic analysis zones used in transportation modeling.

The VMT analysis methodology is based on the San Diego Institute of Transportation Engineer / SANDAG white paper "Vehicle Miles Traveled Calculations Using the SANDAG Regional Travel Demand Model." Based on this analysis methodology, the external to external trips (i.e., trips that only travel through the study area) are not calculated in the analysis as the majority of these trips are regional trips that travel through the study area using regional freeways.

The VMT analysis shows that traffic currently taking a circuitous route from Serra Mesa and surrounding neighborhoods to Mission Valley would have a more direct connection to the commercial area in Mission Valley, reducing VMT and trip length in the process. Meaning, the proposed project would provide a more direct connection for local trips in the Serra Mesa and Mission Valley communities, reducing the total miles traveled. The proposed project would follow the intent of SB 743, which does not oppose local and regional connections; rather, it discourages roadway widening as mitigation, which could increase VMT.

Please also see the response to comment G-62. No revisions to the FEIR are warranted as a result of this comment.

G-88: The commenter asks how the baseline VMT and numbers shown in Table 5.10-4 relate to EMFAC (emission factors model) output.

The Baseline and With Project emissions shown in Table 5.10-4 were estimated by multiplying the VMT numbers obtained from the traffic consultant by emission factors (in grams per VMT) from the EMFAC model. It is unclear if the commenter is asking if the VMT numbers shown in Table 5.10-4 were taken from EMFAC. Regardless, to clarify, the VMT numbers are not from EMFAC, but instead from the traffic consultant. The VMT estimates shown in Table 5.10-4 are specific to the project area. No revisions to the FEIR are warranted as a result of this comment.

G-89: The commenter asks how the project is expected to reduce VMT, what validated methods are available, and asks what role EMFAC plays in this.

Please see the responses to comments G-87 and G-88. Methods for estimating VMT are responded to in other comment responses. EMFAC was not used to estimate VMT in any way; EMFAC was only used to generate vehicle-related emission factors, which were then multiplied by project-specific VMT that was provided by the traffic consultant using validated methods through SANDAG. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity, thereby reducing VMT. No revisions to the FEIR are warranted as a result of this comment.

G-90: This comment asks if the project would decrease VMT.

Please see the response to comment G-87. In addition, as detailed within Section 5.2, *Transportation and Circulation*, of the DEIR, in September 2016, Caltrans approved its Local Development – Intergovernmental Review Program Interim Guidance (Interim Guidance; Caltrans 2016). The Interim Guidance provides direction to help ensure that Caltrans aligns with State policy through the use of efficient development patterns, innovative demand reduction strategies, and necessary multimodal improvements. The Interim Guidance will remain in effect until superseded by the Caltrans Transportation Analysis Guide and Transportation Impact Study Guidelines, currently under development, which will help implement Caltrans Strategic Management Plan 2015–2020 consistent with Senate Bill 743.

The Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity. No new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition. Further, the intent of SB 743 is to reduce greenhouse gas emissions (GHGs) by way of reducing VMT and by eliminating auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. The SANDAG provided analysis shows that the roadway connection reduces VMT. No revisions to the FEIR are warranted as a result of this comment.

G-91: This comment generally raises concerns about the perceived existing traffic patterns within the Serra Mesa community. This comment does not specifically raise issues concerning the adequacy of the DEIR. Existing conditions related to traffic patterns are adequately detailed in Section 5.2.1 of the DEIR.

G-92: This comment is similar to comments G-87 and G-88. Please see the responses to those comments.

G-93: The commenter asks if road changes [from mitigation] that use the term “shall be” are required to be implemented.

The use of “shall be” indicates that the measure is mandatory and must be implemented. Any exceptions to the required implementation is discussed in the Findings on the project’s impacts, mitigation, and alternatives. In cases where a required mitigation would not be implemented, the Findings will provide rationale as to why its implementation is infeasible. No changes to the FEIR are required in response to this comment.

G-94: This comment expresses concern about listing mitigations in both Near-Term and Long-Term sections of the EIR. Per a project-level CEQA analysis, two separate analyses were completed for the EIR (Near-Term and Long-Term). As some of the impacts are found in both scenarios, as noted, they are listed twice. No revisions to the FEIR are warranted as a result of this comment.

G-95: This comment expresses concern about mitigations being listed in the EIR that are already identified in the Final PEIR for the Quarry Falls project. Although this project and Quarry Falls are

somewhat linked, given geography and other characteristics, this project is a standalone process and the EIR for this project must identify impacts of the road connection as such. No revisions to the FEIR are warranted as a result of this comment.

G-96: This comment expresses concern wording difference between MM-TRAF-3 and MM-TRAF-11. The mitigation for this impact will require widening. An edit to MM-TRAF-11 in the EIR has been made to correct this discrepancy.

G-97: This comment expresses concern wording difference between MM-TRAF-4 and MM-TRAF-12 in the Executive Summary. The mitigation for this impact will result in a 4-Lane Collector. An edit to MM-TRAF-4 and MM-TRAF-12 in the EIR has been made to correct this discrepancy.

G-98: This comment expresses concern regarding wording of mitigation measures MM-TRAF-5 and MM-TRAF-15. The mitigation will ultimately be processed through permitting with Caltrans. In City staff communication with Caltrans, they expressed their preference to keep the mitigation consistent with what was approved for Quarry Falls (assuming it still mitigated the impact, and it does). Therefore the description from the Quarry Falls EIR has been used in this EIR.

G-99: This comment expresses concern regarding wording of mitigation measures MM-TRAF-6 and MM-TRAF-16. Please see the response to comment G-98.

G-100: This comment asks about the mitigation required by the Quarry Falls project and how that relates with the proposed project. The commenter also has specific comments about the Quarry Falls Final PEIR.

The proposed project as analyzed in the DEIR is only for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road. The DEIR did not evaluate the impacts of the Quarry Falls project beyond including the Quarry Falls-Civita project as a cumulative project in the cumulative analysis.

The commenter raises issues associated with a different project that does not address the adequacy of the analysis contained with the DEIR. As such, no additional response is required.

G-101: This comment quotes an excerpt from a resolution regarding the approval of the Quarry Falls project.

This excerpt has no relationship to the proposed project. The resolution that initiated the proposed project was detailed in Section 3.2.1 of the DEIR. As detailed therein, "On October 21, 2008, the City Council held a public hearing and approved the Quarry Falls Project. As part of the actions by which it approved the Quarry Falls Project, the City Council initiated an amendment (Staff Recommendation Number 6) that directed City staff to analyze an amendment to the Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Transportation Element.

The Staff Recommendation (City Council Resolution R-304297) stated:

The City Council directs staff to analyze the following issues in relation to the street connection and land use plan amendments:

1. Whether police and fire response times would be improved with the road connection;
2. Whether the road connection could serve as an emergency evacuation route;
3. Whether it is feasible to make the road available for emergency access only; and

4. Whether pedestrian and bicycle access would be improved by the street connection.

This the resolution that applies to the proposed project, not the resolution identified within the comment.

G-102: This comment generally indicates that the DEIR states that the project would improve access in the area, that Mission Center provides a direct link between Serra Mesa and Mission Valley, that efficiency and accessibility would not improve with “added” traffic, and the peak-hour traffic would “divide” the community.

The proposed project would improve local mobility within the Serra Mesa and Mission Valley planning areas as it would provide a direct roadway connection from the southwestern portion of Serra Mesa to the Quarry Falls site for motorists, cyclists, and pedestrians. Section 5.2, *Transportation and Circulation*, does identify significant impacts related to vehicle level of service (LOS) for several intersections and roadway segments in the Near- and Long-Term Scenarios; however, the proposed project would reduce Vehicle Miles Traveled (VMT) within the study area and region, which generally is a better indicator of improving mobility than LOS. Furthermore, vehicles traveling on roadways would not divide a community where roadways currently exist. Please see Section 5.1.7.1 of the DEIR, which states: “The proposed project would include a roadway connection close to regional roadways and freeways (I-805) that, if constructed, would provide a direct connection between the Serra Mesa and Mission Valley community planning areas and more access options for regional trips. Serra Mesa and Mission Valley are currently somewhat divided in the vicinity of the project site due to intervening topography and steep slopes. As such, the street connection between the two adjacent communities would not divide an existing community but would help link them; thus, the proposed project would help achieve the General Plan goal of providing an interconnected street system that provides multiple linkages within and between communities. Impacts would be less than significant.” No revisions to the FEIR are warranted as a result of this comment.

G-103: This comment indicates the surrounding Serra Mesa streets will be impacted by traffic and alternative routes were not studied.

This comment is similar to comment G-62. Please see the response to that comment. Further, the SANDAG modeling performed as part of the project does assume vehicles using all available routes through the roadway network. Therefore, the VMT analysis accurately captures the routes mentioned within the comment. No revisions to the FEIR are warranted as a result of this comment.

G-104: This comment indicates that the Mission Center/Murray Ridge intersection would improve with the project and the ADTs for the segment of Mission Center Road from Aquatera Driveway to Murray Ridge will decrease; however, the data did not consider the improvement to Mission Center Road from I-805 to Murray Ridge Road that is described in the Final PEIR for the Quarry Falls Project if the proposed roadway is not constructed.

The DEIR considers the improvements that are reasonably foreseeable to occur under future conditions without the project. As such, improvements that are funded and planned have been included in the analysis.

G-105: This comment indicates that the DEIR states that widening Mission Center Road from Aquatera Driveway to Murray Ridge Road is unlikely and asks if a structural evaluation was conducted to assess the feasibility of the widening of Mission Center Road in the area of the I-805

bridge. The commenter indicates that this widening was deemed unlikely in the Final PEIR for the Quarry Falls PEIR.

As the commenter indicates in G-104, the proposed project would improve the segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road compared to conditions without the project. No widening of this segment is necessary with the proposed project as no significant impact would occur.

G-106: This comment generally asks how much MHPA would be affected by the widening of a road that would occur for the Quarry Falls project and if it is feasible to widen Mission Center Road.

These questions have no relevance to the proposed project, as the widening of Mission Center Road would not occur. Please also see the analysis within the No Project Alternative, detailed within Section 9.5.1 of the DEIR.

G-107: The comment asks to discuss the impacts of MM-TRAF-15 and MM-TRAF-16.

Mitigation measures MM-TRAF-15 and MM-TRAF-16 both include some degree of widening to reduce significant impacts identified in the DEIR; however, the widening itself could result in a potential secondary impact of the proposed project (please see Section 5.2 of the FEIR). Both on-ramps have shoulders that are several feet wide on each side. A reduction of the shoulder would have no significant impact on the environment. Moreover, if additional space was required, there are areas along the shoulder that are heavily disturbed. A loss of a small amount of heavily disturbed ruderal vegetation would be a less-than-significant impact. Depending on when the improvements would be needed (the date is unknown as of this analysis), any improvements would need to be considered in light of this analysis. Should the widening require more space than is anticipated at this time, additional CEQA compliance may be required at that future date.

G-108: This comment expresses concern regarding the proposed project's impact on existing parking.

Parking is not an issue considered under CEQA unless it is attributable to a physical impact on the environment. This comment does not indicate how any potential loss of parking within the boundaries of the planned park (part of the Quarry Falls Project) would result in a physical impact on the environment.

G-109: This comment expresses concern regarding removal of existing bicycle facilities and compliance with the City's Bicycle Master Plan.

As discussed in the DEIR, all mitigation measures identified in the DEIR that would adversely affect existing bicycle facilities are considered unlikely to be implemented due to conflicts with the existing long-range plans (e.g. Bicycle Master Plan).

G-110: This comment expresses concern with MM-TRAF-4 and MM-TRAF-12 and the feasibility of restriping to five lanes along the Murray Ridge Road bridge over I-805.

Please see the response to comment G-100. The restriping of Phyllis Place (Murray Ridge Road) from the I-805 southbound ramps to the I-805 northbound ramps to accommodate a total of five lanes mirrors the language of MM-5.2-11 from the Quarry Falls EIR, adopted October 21, 2008. Please see Appendix J, Conceptual Improvement Plans & Feasibility Analysis, of the Quarry Falls Traffic Impact Study for a conceptual design of this improvement. No revisions to the FEIR are warranted as a result of this comment.

G-111: This comment requests information regarding mitigation compliance for a separate project, the Quarry Falls project.

The comment raises an issue regarding the implementation of mitigation measures for the Quarry Falls project, which is a separate project from the proposed project. The proposed project as analyzed in the DEIR is only for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road. The DEIR did not evaluate the impacts of the Quarry Falls project beyond including the Quarry Falls-Civita project as a cumulative project in the cumulative analysis. The commenter raises issues associated with a different project that does not address the adequacy of the analysis contained with the DEIR. As such, no additional response is required. DEIR

G-112: The commenter mentions the City initiative Vision Zero and expresses concerns regarding pedestrian safety.

This comment is similar to comment G-68; please see the response to that comment.

G-113: This comment expresses concerns regarding the difference between a Major Arterial and Primary Arterial roadway classification.

The definitions of roadway classifications, including Prime Arterial and Major Arterial, as well as the associated LOS standards are provided in Table 5.2-2 of the DEIR. This comment does not specifically raise issues regarding the adequacy of the DEIR.

G-114: This comment expresses concerns regarding the feasibility of widening Phyllis Place (MM-TRAF-3 and MM-TRAF-11) and the design and features of this roadway as a 5-lane Major roadway. The commenter asks for a discussion of the impacts of widening to be added.

This comment raises similar concerns as those provided in response to comments G-107 and G-110. Please see the responses to those comments. The potential secondary effects of the widening of Phyllis Place has been added to Section 5.2 of the DEIR.

G-115: This comment expresses concerns regarding the adequacy of Phyllis Place if it is designated as a Primary roadway classification.

As noted by the commenter, this applies if the roadway is to be classified as a Primary roadway. As detailed in Section 5.2, Phyllis Place would be widened to a 5 lane major arterial as required by MM-TRAF-3 and MM-TRAF-11. No revisions to the FEIR are warranted as a result of this comment.

G-116: This comment restates a project objective and states the opinion that the project would not meet it due to perceived traffic hazards.

It also restates MM-TRAF-19 from the DEIR and asks several questions related to that mitigation measure. The City does not agree that there is a “blind curve” as alleged by the commenter. The DEIR did identify a potentially significant impact associated with motorists exiting the City View Church. MM-TRAF-19 would alleviate this issue. However, because of the uncertainty of being able to complete the mitigation measure at this stage in the environmental review process, it was assumed it would not be implemented. The City will work with the applicant of the project and the owner of the privately owned church to ensure the safety of motorists exiting the Church.

G-117: This comment asks if it will be safe to walk dogs and cross the street with close to 21,000 cars per day. This comment is similar to comment G-68; please see the response to that comment.

G-118: This comment expresses concern about vehicles coming from North Park and University Heights using the road connection.

A select link analysis, a specific model run which shows where trips/vehicles that are using the road connection originated from, was conducted using the SANDAG Series 12 model in support of the VMT analysis. The select link analysis utilized the SANDAG Series 12 model to determine the origins and destinations of each of the trips that pass through the proposed roadway connection. Select link analysis results are provided as Attachment B to these response to comments. As shown in Attachment B, the majority of the traffic volumes that travel through the proposed roadway connection have either their origin or destination within the Mission Valley or Serra Mesa communities. Less than 1% (74 daily trips out of 34,086 trips) would travel from the North Park area, through Mission Valley, and through the proposed roadway connection. Thus, it is reasonable to conclude that the proposed project would only serve the Mission Valley and Serra Mesa communities and not regional through-traffic, but the SANDAG modeling did account for any trips/vehicles that might use the road connection as a “cut-through” route and is part of the analysis. Further, the select link analysis shows little to no traffic coming from the areas/communities discussed by the commenter.

G-119: This comment asks about the traffic study area and the inclusion of alternative routes. This comment is similar to comment G-70; please see the response to that comment.

G-120: The comment asks for information on the responsible party for cost and implementation of the mitigation measures.

The Mitigation Monitoring and Reporting Program (MMRP), as required by CEQA, states the party responsible for financing and implementing the mitigation. The responsible party can be different for one or more mitigation measures depending on the type of impact and the cause of the impact. Generally speaking, the responsible party for financing and implementing mitigation for the proposed project will be the future developer. However, the City may also have responsibility for implementing measures. In all cases, the City is the party responsible for verifying mitigation has been implemented.

G-121: The comment quotes the DEIR and indicates there are certain mitigation measures that may not be implemented because of conflicts with other priorities or preferences, such as existing adopted plans. The commenter requests that language in a footnote of Table ES-1 be included with each measure and that a chart be provided that analyzes the feasibility of the mitigation measures.

Please note that the Findings for each significant impact discusses the feasibility of all mitigation measures proposed. The draft Findings are available for review (at the time the FEIR is released). The footnote language, while providing additional explanation related to the measures listed in tabular format, is not needed within the mitigation because it is mentioned with the appropriate EIR sections to ensure the reader is aware that specific mitigation measures are unlikely to be implemented. No changes to the FEIR are required in response to this comment.

G-122: This comment states that several mitigation measures are assumed not to occur and asks if they were used in the “with project with mitigation charts” within the DEIR.

As detailed in Section 5.2, *Transportation and Circulation*, in cases where a mitigation measure would conflict with an adopted land use plan (e.g. Bicycle Master Plan), it is assumed that mitigation measure would not be implemented. Although these mitigation measures were applied to the mitigated scenarios for informational purposes, because they would not be implemented, the

conclusion is that the impact would remain significant and unavoidable. No further response is warranted.

G-123: This comment expresses concern regarding community/emergency access.

The statement in Section 5.1, *Land Use*, is describing community/emergency access as a whole and details the roadway connection's benefits, whereas the statement in Section 5.2, *Transportation and Circulation*, is describing community/emergency access as only as it relates to the approximately 200 homes in the Abbotshill neighborhood. There is no contradiction between these two discussions.

G-124: This comment asks to discuss the proposed project's relationship with the City's Climate Action Plan.

The project's consistency with the Climate Action Plan (CAP) is discussed in detail in Section 5.10, *Greenhouse Gas Emissions*, of the DEIR. Please refer to the detailed discussion therein. The DEIR concluded that the proposed project would be consistent with the CAP as it would reduce VMT and associated GHG emissions. No revisions to the FEIR are warranted as a result of this comment.

G-125: This comment purports that there are on-street parking issues within Quarry Falls and states that on-street parking will be affected in Serra Mesa by the project.

Parking is not an issue that is analyzed within CEQA unless it is attributable to a physical impact on the environment. The commenter mentions the parking effects of the Civita development as it relates to the existing condition, not the proposed project's impact on parking. The commenter suggests the proposed project would make it easier for people to park their cars on the streets, but does not provide any evidence to support this opinion.

G-126: This comment quotes a significance determination threshold from the DEIR, alleges that the roadway connection has the potential for altering circulation movement by encouraging vehicles to travel through Serra Mesa for access to I-805 and Kearny Mesa, and requests that the change in circulation be discussed. This comment also generally questions the community access analysis. Please see the response to comment G-118. In addition, the changes in circulation due to the proposed project are discussed in detail and in compliance with CEQA and the City's Significance Determination Thresholds within Sections 5.2.4 (Near-Term Scenario) and 5.2.5 (Long-Term Scenario) of the DEIR.

The community access analysis was determined by calculating the total amount of travel time needed to reach hospitals, fire stations, schools, and libraries/parks within the community from two reference points within the Serra Mesa and Mission Valley communities. This analysis is not meant to provide the estimated travel time from an origin to a destination; rather, it is to provide a means to compare the differences between two scenarios ("with" and "without" project).

The calculation process for the community access analysis score is as follows:

- Establish a reference point in the study area;
- Establish destinations within the study area by category type (hospital, fire station, etc.);
- Determine travel time from the reference point to each of the destinations for both the "with" and "without" project scenarios;

- Sum up the travel time for the “with” and “without” project scenarios; this total provides a score that represent the travel time efficiency for the “with” and “without” project scenario (as shown in Table 8-1 of the KOA TIS). The analysis does not show individual travel times; rather, it shows a summation of travel times.

Calculation details are shown in Appendix J of the KOA TIS. Due to Excel calculations and rounding, certain calculation shown a +/- 0.1 mile different in the calculation results. However, this difference is minimal and does not affect the DEIR/TIS finding. No revisions to the FEIR are warranted as a result of this comment.

G-127: This comment expresses concern regarding future bus service utilizing the roadway connection (or lack thereof) and requests that a statement from Appendix C be added to the DEIR.

This comment does not specifically raise issues concerning the adequacy of the DEIR. However, City and MTS regularly coordinate regarding routes and service and will do so with regards to this connection if such service would improve the local and regional transit service. No revisions to the FEIR are warranted as a result of this comment.

G-128: This comment cites meteorological data from Lindbergh Field and suggest the analysis be updated to reflect meteorological data from Montgomery Field, which is closer to the project site.

The meteorological data presented in the analysis is only to present generic baseline conditions. Information from the meteorological data, such as wind speed, is not used in any portion of the analysis. Therefore, because changing the location of the meteorological station would have no effect on the findings in the analysis, no changes to the FEIR are required.

G-129: This comment requests baseline sampling be done at key areas within the analysis area.

It is unclear if the commenter is requesting air monitoring be done at key areas within the vicinity of the project site. The analysis established baseline air quality conditions based on information from nearby air monitoring stations, which are operated by the California Air Resources Board (CARB) and San Diego Air Pollution Control District. A microscale carbon monoxide hotspot analysis was performed, which estimated pollutant conditions assuming worst-case meteorological conditions, modeling parameters, and receptors locations, and estimated that pollutant concentrations at the most congested intersections would be far below state and federal air quality standards. Moreover, as detailed in Appendix H to the DEIR, regional VMT is expected to decrease as a result of the project, and while vehicle trips are expected to increase at certain roadways within the project area, vehicle traffic would be predominantly passenger vehicles, which are not a significant source of diesel emissions. Therefore, because the project would not result in air pollutant impacts both regionally and locally within the project area, and because the analysis of microscale carbon monoxide modeling shows no localized impacts are expected, baseline sampling is not needed and no changes to the FEIR are required.

G-130: This comment states the project will increase ADTs on Phyllis Place and asks what the maximum grade of the roadway will be, if the grade of the roadway will impact air pollution, and if the impact to air pollution will be studied.

According to the DEIR (page 3-5), the maximum grade is expected to be 7%. The air quality analysis estimated the effects of traffic redistribution both regionally, as shown in Table 5.3-6, and locally, as shown in Table 5.3-7. While the analysis did not specifically model conditions at all locations along Phyllis Place, including along the roadway grade, the analysis did model concentrations at nearby

intersections that display the worst intersection conditions, including the near intersection at Via Alta and Franklin Ridge (bottom of the new roadway), as well as at Murray Ridge/Phyllis Place and the I-805 north ramps, and pollutant concentrations at all locations are expected to be far below pollutant standards prior to mitigation. Moreover, mitigation to widen and re-stripe Murray Ridge/Phyllis Place would ensure traffic impacts at segments and intersections would be improved, which would ensure emissions from idling would be reduced below the unmitigated conditions that were modeled (and presented in Table 5.3-7). Therefore, because the increase in ADTs on Phyllis Place was modeled and no impacts are expected, no changes to the FEIR are required.

G-131: The commenter asks if emissions would collect at the retirement/senior units across Phyllis Place because of winds blowing up the hill and if the analysis will study this.

Please see the responses to comment G-129 and G-130. Traffic conditions are not expected to impact nearby sensitive receptor locations. No changes to the FEIR are required.

G-132: This comment asks if diesel vehicles (including diesel delivery trucks for the Civita retail area) will be queuing and if the air quality analysis will quantify this.

Please see response to comment G-130. Traffic mitigation would widen and re-stripe Murray Ridge/Phyllis Place to ensure traffic impacts at segments and intersections would be improved, which in turn would ensure emissions from idling would be reduced. Project traffic would consist predominantly of passenger vehicles, which are not a significant source of diesel emissions. Therefore, diesel vehicles are not expected to queue. No changes to the FEIR are required.

G-133: The comment asks if tractors, trailers, and buses can be restricted from the roadway connection.

Please see the response to comment G-132. At this stage in the environmental review process and conceptual design phase, no restrictions are anticipated to be in place to restrict tractors, trailers, and buses from traveling through the project area. Large diesel trucks comprise a minor portion of the overall vehicle population in San Diego County. For example, EMFAC shows that medium-duty, heavy-duty, and buses comprise only 4% of County-wide VMT under existing conditions. Therefore, while no restrictions will be placed on certain vehicles from accessing the roadway connection, these vehicle comprise a small share of overall VMT and therefore would have minimal to no effect on localized air quality. No changes to the FEIR are required.

G-134: The comment states that there are various existing and planned sensitive receptors locations near the project area. The commenter goes on to state that the City's thresholds state that the more restrictive of the guidelines should be applied if sensitive receptors are involved and asks if analysis of the particulate matter was made for each of these sensitive receptor locations.

Please see the responses to comments G-129 through G-132. The analysis quantitatively analyzed carbon monoxide hotspots and discussed diesel particulate matter at nearby receptor locations. The City's recommends applying state and federal ambient air quality standards as the threshold when the project involves a sensitive receptor. The carbon monoxide hotspot analysis was performed in accordance with the City's guidance, and maximum CO concentrations were estimated to be far below state and federal ambient air quality standards (Table 5.3-7). No changes to the DEIR are required.

G-135: This comment asks if a hotspot analysis will be conducted and to explain the reasoning if not.

Please see the response to comment G-129 about the carbon monoxide hotspot analysis that was included in the DEIR. No changes to the FEIR are required.

G-136: This comment asks if air quality impacts associated with redistribution of traffic and increased traffic volumes at specific roadway segments and intersections were analyzed.

Please see the response to comment G-129 about the fact that while vehicle trips are expected to increase at certain roadways within the project area, regional VMT is expected to decrease as a result of the project, which would reduce criteria pollutant and GHG emissions relative to conditions without the project. No changes to the FEIR are required.

G-137: This comment states that the project would cause queuing in the vicinity of the I-805 ramps and asks if pollution-related impacts from this queuing were analyzed.

Please see the response to comment G-130. The air quality analysis estimated carbon monoxide concentrations due to traffic queuing at Murray Ridge/Phyllis Place and I-805 north ramp, and pollutant concentrations at all locations are expected to be far below pollutant standards. No changes to the FEIR are required.

G-138: This comment asks if impacts from the air pollution were analyzed at the school and preschool located at Faith Community Church.

Air pollution was not specifically analyzed at Faith Community Church, but air pollutant concentrations were analyzed at receptors adjacent to the Murray Ridge/Phyllis Place and I-805 north ramp intersection to represent the possibility of extended outdoor exposure. Air pollutant concentrations adjacent to the intersection would be worse than concentrations at the church, and since concentrations at the modeled receptors were estimated to be far below air quality standards, concentrations at the church would be similarly low. No changes to the FEIR are required.

G-139: This comment states that because the site for the roadway connection was not approved for Quarry Falls, to explain why the EIR determined that project-related vehicle trips have been anticipated in the Regional Air Quality Strategy (RAQS).

As described in Section 5.3.4.1 of the DEIR, the project would not conflict with zoning designations, as it would establish right-of-way for the roadway within these designations, and would not preclude any land from being developed consistent with these designations. Moreover, the RAQS is a plan for attaining and maintaining ambient air quality standards, and projects that reduce emissions, particularly by reducing vehicle miles traveled, would be consistent. The project would reduce emissions that would help the region attain federal and state ambient air quality standards, the project would be consistent. No changes to the FEIR are required.

G-140: This comment cites the City's Significance Determination Thresholds for where a quantitative CO hotspot analysis should be performed and asks why a quantitative analysis of CO hotspots was not conducted at the roadway segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road.

As shown in Table 5.2-10 of the DEIR, traffic conditions at the roadway segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road improve from 18,158 ADT and LOS F under Near-Term Baseline (No Project) conditions to 8,137 ADT and LOS D under Near-Term with Project conditions. Additionally, although Mission Center Road from Aquatera Driveway to Murray Ridge Road would operate at LOS F under both Long-Term with and without project conditions, the proposed roadway connection would result in a net decrease in the volume to capacity ratio along

this segment compared to Long-Term Baseline conditions. Moreover, there are no areas along this segment where cars would queue, so air pollutant concentrations would be better than any of the intersections that were quantitatively analyzed in Table 5.3-7. No changes to the FEIR are required.

G-141: This comment states because the project would increase ADTs on Mission Center Road from Aquatera Driveway to Murray Ridge Road relative to existing conditions, and given Hye Park's location at the bottom of a deep ravine, the comment asks if air pollution would concentrate at Hye Park and if this was studied.

Please see the response to comment G-131. Traffic conditions along the Mission Center Road from Aquatera Driveway to Murray Ridge Road segment would improve under project conditions. Therefore, air quality conditions along this segment, including in the Hye Park area, would improve. No changes to the FEIR are required.

G-142: This comment asks if it is determined that the Traffic Impact Study needs to be revised, would this affect the air quality analysis, and if so, which portions of the analysis.

The Traffic Study was conducted in accordance with City guidelines and has been accepted by the City of San Diego Planning Department. The comment offers no substantive evidence as to why the Traffic Study data is inaccurate. Therefore, the impact determinations within Section 5.3, *Air Quality*, of the DEIR, remain valid. While some transportation-related mitigation measures have been revised for clarification, the results of the traffic analysis, specifically regarding traffic distribution, VMT, and intersection volumes and metric (e.g., LOS) were not changed. Therefore, no changes to the air quality analysis are required.

G-143: This comment states that the project area would be converted from plant covered terrain to a hard surface roadway and asks if this will have any impact on air quality.

The project site is currently an undeveloped and primarily disturbed hillside and is not "plant covered" as this comment states. Section 5.5 of the recirculated DEIR has an in-depth description of the existing site biology, and identifies mitigation to offset any loss of vegetation and habit during construction and operation. Most of the research on air pollution effects of vegetation point to tall (taller than 10 meters) and mature trees (trees improving pollutant concentrations (see CARB's recent Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadway)). There are no such studies that talk about disturbed shrubs providing air quality benefits. No changes to the FEIR are required.

G-144: This comment states that there were more noise measurements made in Mission Valley than in Serra Mesa and asks why a measurement was not made in the residential area at the western end of Phyllis Place.

Five noise measurements (M1 through M5) were taken throughout the study area to provide a snapshot of existing conditions close to the proposed project and along roadways that would be affected by the project, as indicated by the Traffic Impact Analysis (TIA). However, assessment of potential project impacts was based on additional noise modeling as represented by eleven receptors (R1 through R11) in the DEIR, including receptor R5, which is adjacent to the western portion of Phyllis Place. In response to other comments received regarding the DEIR, a twelfth modeled receptor, R12, has also been added to the FEIR. As such, noise measurements are informative but not critical to the impact findings of the analysis and additional measurements are not necessary. Regarding the specific possibility of a measurement at the western end of Phyllis Place, this location was not selected because it is beyond the area included in the TIA, indicating that

traffic volumes and the associated traffic noise levels will not change substantially on this roadway segment as a result of the project. No additional measurements will be conducted, and no changes to the FEIR are warranted as a result of this comment.

G-145: This comment states that the residential area near the corner of Mission Center Road and Murray Ridge Road has a steep slope and a lot of traffic and asks if this corner will be added to the study.

This location will not be added to the study because it is not required in order to determine project impacts pursuant to CEQA. The thresholds for traffic noise impacts consider both overall noise levels and predicted noise level changes due to the project. Analysis at Receivers R9 and R10 address traffic noise levels along both Mission Center Road and Murray Ridge Road, and no significant noise impacts were identified. No changes to the FEIR are warranted as a result of this comment.

G-146: This comment asks why sites R1 and R8 were selected for the noise study. It also generally asks if the area along Murray Ridge Road and Sandrock Road will be added to the noise study.

R1 and R8 are located adjacent to Friars Road and Qualcomm Way, respectively. Traffic on both of these streets would change as a result of the proposed project. Qualcomm Way connects directly into Civita and Friars Road is a major arterial into and out of the area. Nonetheless, no significant noise impacts are predicted at either of these locations. Affects adjacent to Murray Ridge Road were addressed with the analysis of Receiver R9, and were found to be less than significant. Sandrock Road is approximately 1.5 miles from the project site and would experience only small changes in traffic as a result of the project. In addition, there are no significant noise impacts along roadways between the project and Sandrock Road. Therefore, it can reasonably be inferred that there will be no significant impact along Sandrock Road itself, and further analysis is not required. No changes to the FEIR are warranted as a result of this comment.

G-147: This comment requests the inclusion of the maximum measurements of noise and their frequency or provide a reason for their exclusion.

Maximum noise levels measured at each noise measurement location have been added to the FEIR. It is noted that these maximum noise levels refer to very brief (1 second or less) periods of high noise that are generally not representative of the average noise levels used in the analysis. Regarding the frequency (pitch) of the measured noise levels, frequency spectra were not gathered during the noise measurements and cannot be reported; however, this data is not required for the analysis provided in the EIR. The minor additions that have been added represent clarifying information that has been included at the request of the commenter but does not change the conclusions of the impact analysis.

G-148: This comment requests that the standard deviation for the noise measurements is provided.

Standard deviation data is not required for the analysis and therefore was not calculated or reported. No changes to the FEIR are warranted as a result of this comment.

G-149: This comment states that noise was analyzed using the data from the Traffic Impact Study and asks that if the Traffic Impact Study data is inaccurate if the noise study be redone.

The Traffic Study was conducted in accordance with City guidelines and has been accepted by the City of San Diego Planning Department. The comment offers no substantive evidence as to why the Traffic Study data is inaccurate. Therefore, the impact determinations within Section 5.4, *Noise*, of the DEIR, remain valid. While some transportation-related mitigation measures have been revised

for clarification, the results of the traffic analysis, specifically regarding traffic distribution, VMT, and intersection volumes and metric (e.g., LOS) were not changed. Therefore, no changes to the noise analysis are required.

G-150: This comment states that the ADT for Franklin Ridge Road/Phyllis Place will increase from 2,420 (existing) to 34,540 (long term) with a LOS F (PM). It also states that the long term impacts with the roadway connection and without the roadway connection show a change of either 0 or 1 decibel (dB) in the residential areas of Murray Ridge Road and Phyllis Place and at City View Church and generally asks for an explanation.

Per the project traffic study, traffic volumes on the west end of Phyllis Place (i.e., west of the proposed roadway connection) are not predicted to increase in the future; therefore, a small traffic noise increase is consistent with the stated traffic volumes. As noted in the comment, traffic volumes on the east end of Phyllis Place (i.e., east of the proposed roadway connection) would increase from 2,420 (existing) to 34,540 (long term). However, the closest adjacent receptor is the City View Church which is set back approximately 200 feet from Phyllis Place and is also within 250 feet of I-805, which is estimated to carry daily traffic volumes of 164,000. The much higher traffic volume, as well as higher traffic speeds and greater percentage of trucks on the freeway compared to Phyllis Place, means that the freeway is the dominant source of traffic noise. Therefore, increasing the traffic volume on Phyllis Place does not have a large effect on the total traffic noise level at the church. The conclusion is correct, and no changes to the FEIR are warranted as a result of this comment. It is noted that, in response to other comments received regarding the DEIR, all traffic noise levels in the Noise section of the FEIR are now reported to a tenth of a dB to more clearly illustrate small changes in noise levels.

G-151: This comment asks why the increase in the noise level is not the same for R5 (Residential adjacent to Phyllis Place) and R6 (Church adjacent to Phyllis Place) since these two areas appear on the map to be equally distant from the roadway connection. This comment also asks that if elevation accounts for the difference in the noise level if there would be an increase in the noise level in the residential areas west of R5, as the comment states that this area has a lower elevation.

The traffic noise levels reported in the DEIR were all rounded to 1 decimal place for ease of presentation. However, this may lead to counterintuitive results. For instance, when rounded to whole numbers, a noise increase of 0.4 dB from 59.2 to 59.6 dB would appear as a 1 dB change from 59 to 60 dB; whereas a 0.4 dB change from 61.7 to 62.1 dB would appear as a 0 dB change after rounding because both values round to 62 dB. To resolve this potential confusion, all traffic noise levels in the Noise section of the FEIR are now reported to a tenth of a dB to more clearly illustrate small changes in noise levels. With this update, the traffic noise increase due to the project is 0.4 dB at both R5 and R6 under near-term scenarios and 0.5 dB at both R5 and R6 under long-term scenarios. Although the noise increases at each of these receptors happen to match, it should be noted that the traffic noise analysis models the effects of traffic noise from all of the considered roadways, not just the proposed new roadway connection. As a result, distance to the roadway connection is not the only variable in determining the noise level increases. Other pertinent variables include traffic volumes (and changes) on all nearby roadway segments and distances to these roadways.

G-152: This comment states that Serra Mesa is located above Mission Valley and asks if climatic and environmental conditions will be included or considered in the noise analysis.

The traffic noise analysis described in the DEIR used the Federal Highway Administration's (FHWA) Traffic Noise Model (TNM) 2.5, which is the most recent approved federal software for analysis of traffic noise. This model includes the consideration of basic environmental conditions such as ground type. Relative humidity and temperature are assumed at default values as mandated by FHWA. TNM assumes neutral conditions for the effect of wind. Additional climatic and environmental variables are beyond the scope of the model and are not included. The approach used for climatic and the environmental conditions is consistent with standard industry practice and federal requirements for roadway projects. Subsequently, no changes to the FEIR are warranted as a result of this comment.

G-153: This comment states the opinion that vehicles including diesel delivery trucks, especially from the retail area of Civita will be queuing on a roadway connection with a steep grade. It also asks what the noise level will be during the peak time.

The commenter does not provide substantial evidence that vehicles including diesel delivery trucks, especially from the retail area of Civita will be queuing on a roadway connection with a steep grade. As detailed within Section 5.4, *Noise*, of the DEIR, the thresholds of impact established for the project are based on City standards and, as such, they utilize the 24-hour average metric, Community Noise Equivalent Level (CNEL). Therefore, calculation of other noise metrics, including peak-hour levels, is not required in order to make a determination of significance. Subsequently, no changes to the FEIR are warranted as a result of this comment.

G-154: This comment quotes a policy from the Noise Element and asks if tractors, trailers, and buses can be restricted from the roadway connection.

At this stage in the environmental review process and conceptual design phase, no restrictions are anticipated to be in place to restrict tractors, trailers, and buses from traveling through the project area. Large diesel trucks comprise a minor portion of the overall vehicle population in San Diego. The need for such a measure was not identified by the noise study, so this restriction will not be required at this time. No changes to the FEIR are required.

G-155: This comment states that Phyllis Place will become a heavily used major arterial and asks to discuss the noise impact on the adjoining retirement/senior homes, church, and single-family dwellings. It also refers to page 9 of the addendum attached to the comment letter.

Along Phyllis Place, the closest noise-sensitive receivers to the project are City View Church and City View Retirement Apartments, which are included in the noise analysis as R6 and R5, respectively. As such, noise levels and impacts at both of these locations have been analyzed in the DEIR and found to be less than significant. Subsequently, no changes to the FEIR are warranted as a result of this comment. It is noted that the retirement apartments are over 300 feet *west* of the proposed roadway connection whereas the project-generated increase in traffic on Phyllis Place would all occur *east* of the roadway connection. The church is adjacent to the segment of Phyllis Place east of the roadway connection that would experience traffic increases as a result of the project, but is set back approximately 200 feet from the roadway. Traffic noise analysis indicates future noise levels of approximately 60 to 62 dB CNEL at these locations. This is below the guideline of 65 dB CNEL and, as a result, there are no new impacts due to this comment.

G-156: This comment states that the data for R11 – Residential adjacent to Via Alta is listed as 60 for existing but reduced to 57 for near-term baseline and asks why the sound level would decrease.

Traffic counts were collected in 2011 and verified in 2013 to represent the existing conditions. At that time both Via Alta and Civita Boulevard were under construction and incomplete, and experienced high levels of construction traffic. This led to seemingly high traffic volumes and corresponding noise levels that were not representative of typical traffic conditions on the roadways after construction, which in turn gave rise to the counterintuitive reduction in traffic noise levels noted in the comment. As a result of this comment and to avoid further potential confusion, the FEIR has been updated to remove Via Alta and Civita Boulevard from the analysis of existing traffic noise levels and all existing traffic noise levels have been removed from the body of the report (the calculated values are still reported in the appendices). This change is a clarification and does not lead to any new or substantial increase in noise impacts.

G-157: This comment states that the data for R-11 – Residential adjacent to Via Alta is listed as 60 for existing and for near-term with project and states that with the project there will be more traffic on Via Alta. It also asks why the sound level does not increase.

The traffic model was reviewed and the future traffic volumes on Via Alta were found to be incorrect. These values have been updated to reflect the correct ADTs provided in the traffic study. With this correction the noise levels along Via Alta are higher with the project than without, as suggested by the comment (60.4 dB CNEL for near-term plus project scenario, versus 56.5 dB CNEL for the near-term baseline scenario). This change does not lead to any new noise impacts.

G-158: This comment states that the Final PEIR for the Quarry Falls Project (p. 10-49) identified 72 CNEL for the Franklin Ridge Road-Via Alta-Phyllis Place segment. It asks to discuss the discrepancy between the Quarry Falls noise study and the noise study in the DEIR and if the 72 CNEL is the actual noise level.

The Quarry Falls PEIR relied on a noise impact analysis prepared approximately 10 years ago (June 7, 2007) that was based on the project description and data available at that time. The noise level of 72 dB CNEL mentioned in the comment refers to the Quarry Falls PEIR's predicted traffic noise level at a reference distance of 50 feet from the centerline of the roadway connection (i.e., Franklin Ridge Road between Via Alta and Phyllis Place, based on the road naming conventions used at the time of the Quarry Falls PEIR). The recirculated DEIR analyzes noise levels at specific noise-sensitive receptors using actual setbacks from roadways rather than a fixed distance of 50 feet. Another important difference between the two analyses is that the Quarry Falls PEIR used a previous version of the federal roadway noise prediction model (FHWA-RD-77-108), whereas the recirculated DEIR used the current traffic noise model TNM version 2.5. The recirculated DEIR provides the most up-to-date traffic noise analysis based on the most recent available data. Subsequently, no changes to the FEIR are warranted as a result of this comment.

G-159: This comment quotes page NE-10 from the Noise Element of the City's General Plan and also states that the area of the roadway connection in Serra Mesa is zoned for single family dwellings and there will be single family units in the Civita area of the roadway connection. The commenter also asks that if it is determined that the Franklin Ridge Road-Via Alta-Phyllis Place segment is 72 CNEL, to discuss the allowance of a roadway connection in regards to the cited Noise Element guidelines and attenuation measures.

As noted in the DEIR (p. 5.4-10) "[t]he purpose of [Land Use – Noise Compatibility] guidelines is to direct the placement of noise-sensitive developments (e.g., homes, parks, schools) and avoid locating projects in areas that have incompatible (i.e., excessive) noise levels for the project type. Because the proposed project comprises a roadway, which is not a noise-sensitive land use, these guidelines do

not apply to the project.” With regard to the other questions raised in the comment, the noise level of 72 dB CNEL is based on an earlier environmental study that analyzed a standard setback of 50 feet from the centerline of the street (please see the response to comment G-159 for further discussion) using an outdated noise model. If homes are set back farther from the street then noise levels will be lower. In any case, any future homes will be required to comply with applicable City or State noise standards, including “noise attenuation measures to ensure an interior noise level of 45 dBA CNEL” if they would be exposed to noise levels in excess of 70 dB CNEL as a result of their actual location. No changes to the FEIR are warranted as a result of this comment.

G-160: This comment asks why the dBA CNEL would increase long term with the project versus without the project at site R2 (Residential adjacent to Mission Center Road north of Friars Road). It states that if more vehicles will be using the roadway connection, the noise level should logically decrease.

The traffic model was reviewed and the traffic volumes on the south portion of Mission Center Road were found to be incorrect under some scenarios. These values have been updated in Table 5.4-8 to reflect the correct ADTs provided in the traffic study. With this correction the noise levels at R2 are lower with the project than without, as suggested by the comment. This change does not lead to any new noise impacts.

G-161: This comment states that the site of the roadway connection will change from a plant covered terrain to a hard surface roadway. It asks what effect the hard surface has on noise propagation and if the road surface was considered during the noise analysis.

The project site is currently an undeveloped and primarily disturbed hillside and is not “plant covered” as this comment states. Section 5.5 of the recirculated DEIR has an in-depth description of the existing site biology, and identifies mitigation to offset any loss of vegetation and habit during construction and operation. The traffic noise modeling software used in the analysis (TNM 2.5) accounts for ground type. The analysis included an assumption of acoustically “soft” ground to represent the project site in its existing condition. The model also recognizes the road surface as acoustically “hard” ground. Therefore the change in ground type as a result of the proposed project has been accounted for in the noise analysis, and no changes to the FEIR are warranted as a result of this comment.

G-162: This comment excerpts Section 15131(b) of the CEQA Guidelines related to economic and social effects and asks if an analysis was made regarding the roadway connection on the religious practices of City View Church and of Faith Community Church.

The closest church to the project site is City View Church which is analyzed as receptor R6 within Section 5.4, *Noise*, of the DEIR. Impacts at this location were found to be less than significant. Faith Community Church is farther from the proposed project; it is adjacent to a segment of Murray Ridge Road that has lower predicted traffic volumes, and a lower predicted relative increase in traffic, than Phyllis Place adjacent to City View Church. Therefore, it can reasonably be concluded that noise impacts at Faith Community Church would also be less than significant, and no changes to the FEIR are warranted as a result of this comment.

G-163: This comment quotes the “City of San Diego Final PEIR” which states that heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor. It also states that Mission Center Road from Aquatera Driveway to Murray Ridge Road without the connection will become a heavily used major

roadway with ADTs of 23,850. The comment asks for a discussion of the noise impact on the adjoining Hye Park condominium complex.

The comment refers to the predicted future ADT *without* implementation of the proposed project. The purpose of the DEIR is to assess potential impacts associated with project implementation. It is noted that, with implementation of the proposed project, the future-without-project ADT of 23,850 would be reduced to 13,064. Further analysis of the No Project Alternative is included within Section 9.5.1 of the DEIR. No changes to the FEIR are warranted as a result of this comment.

G-164: This comment quotes an excerpt from Appendix F of the DEIR, which states that the biological resources survey only included a 150-foot buffer to provide context as to the type of adjacent biological resources present. It also states to refer to Figure 5.5-1 of the DEIR which indicates a 100-foot buffer encompassing the area of potential effect of a future roadway. It then asks if this 100-foot buffer is the same as the 150-foot buffer referred to in the letter.

As detailed within Appendix F, the buffer is only to provide context as to the type of adjacent biological resources present. As detailed in the introduction of Section 5.5, *Biological Resources*: "Information in the following discussion is based on the Biological Resources Letter Report that was prepared for the proposed project and is included as Appendix F-1 of this EIR. ICF prepared a Supplemental Biological Resources Letter Report for the gas line work area, included as Appendix F-2. ICF conducted a biological survey within two small areas immediately east and west of the existing project site for the project in order to determine if sensitive biological resources were present. The survey was conducted when it became apparent that the raising of a gas line to a depth of 3 feet below ground level within the San Diego Gas & Electric easement could be hastened if the project was to proceed prior to the gas line work being performed. Each area where work on the gas line is to occur is approximately 6,000 square feet, for a total work area of 12,000 square feet (0.27 acre). These areas have been incorporated within the project site."

Therefore, Figure 5.5-1 was updated to include the gas line work area and a 150-foot buffer. However, this buffer is to provide context as to the type of adjacent biological resources present only. It represents a minor clarification and does not change the impact analysis or conclusions within Section 5.5, *Biological Resources*, of the DEIR.

G-165: This comment states the opinion that if the roadway connection is approved, it will traverse through Phyllis Place Park and create the need for additional park space. The commenter asks if this required additional space would be located in the MSCP area.

As detailed in Chapter 3, *Project Description*, there were two GDPs processed for Phyllis Place Park—one with the roadway connection and one without. The park would not require additional space as there are two different designs, and neither design would extend into any adjacent MSCP areas. No revisions to the FEIR are warranted as a result of this comment.

G-166: This comment asks that if City View Church is required or finds it necessary to make changes to their parking lot and/or driveways because of the roadway connection, if changes to the stormwater drain system be required. The commenter asks for a description of the changes, impacts, costs, and responsible party for costs if changes to the storm drain system are required.

As detailed in Section 5.2, *Transportation and Circulation*, MM-TRAF-19 that relates to the potential realignment of the City View Church eastern driveway was assumed to not be implemented for the reasons detailed within the DEIR. Therefore, as it cannot be reasonably determined at this time if the driveway relocation would occur at all, it cannot be reasonably determined if changes to the

stormwater system would be required. No revisions to the FEIR are required as a result of this comment.

G-167: This comment states that some of the 56 retirement/senior homes at City View Church have windows that face Phyllis Place and asks if studies were conducted to determine the impact on these homes from vehicles traveling at night on the roadway connection with headlights on, street lights, and light from the traffic signal at the intersection.

Please refer to Section 5.9.7 of the DEIR, which analyzes potential impacts regarding new sources of lighting and glare and determines impacts to be less than significant: “The proposed project may include minor roadway lighting similar to that of the surrounding development and additional vehicle headlights from nighttime travel; however, no new substantial source of lighting would be introduced to the area such that daytime or nighttime lighting conditions would be notably modified, nor would daytime or nighttime views be altered due to any lighting improvements associated with the proposed project. Given these factors, the contribution of light emitted from the addition of the proposed roadway segment would be negligible, and impacts would be less than significant.” No revisions to the FEIR are required as a result of this comment.

G-168: This comment states that Phyllis Place is the only roadway in and out of the neighborhood for the 56 multifamily retirement/senior units located at City View Church as well as for the Abbotshill area. It also states that the roadway connection would increase ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place. It then asks to describe the criteria used to conclude that “impacts would be less than significant” within Section 5.9.4 of the DEIR.

As stated in Section 5.9.4 of the DEIR, the issue question is as follows: Would the proposed project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

It is then stated that the significance criteria is as follows: “Projects that would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyons, waterways) may result in a significant impact. It should be noted that views from private property are not protected by CEQA or the City.”

As detailed in Section 5.9.4.1, Impact Discussion: “The project site is not identified in the City of San Diego General Plan, Serra Mesa Community Plan, or Mission Valley Community Plan as being within a designated public view corridor. Additionally, there are no significant visual landmarks, public resources, or scenic vistas identified in these plans in the vicinity of the project site.

The proposed project would involve construction of a roadway to connect Phyllis Place with Via Alta and Franklin Ridge Road within a 2-acre site, which would be a ground-level feature with minimal vertical elements. During construction of the proposed project, soil stockpiling, construction equipment, and personnel within the construction zones may be visible to motorists, pedestrians, or bicyclists using Phyllis Place, Via Alta, and Franklin Ridge Road; however, these components would not block any views of or through the project site. Upon completion of construction, all temporary visual impacts due to construction activity would cease. Street lighting, including lighting poles, would be installed for the roadway as well as landscaping trees; however, no vertical building structures would result from implementation of the proposed project that would block views from Phyllis Place or otherwise obstruct views of motorists, pedestrians, or bicyclists from roads in the area. In addition, as part of the Quarry Falls project, a linear park would be constructed along the southern side of Phyllis Place. As noted in Chapter 3, *Project Description*, there are two approved

general development plans for the linear park, one with the proposed roadway and one without. The proposed roadway is a ground-level feature, and its implementation would not obstruct views that may be available from this proposed park or from any other park or open space areas in the vicinity of the project site. Therefore, no scenic views would be blocked or affected, and implementation of the proposed project would not block or otherwise affect any designated scenic vistas.”

Therefore, the DEIR adequately details the issue question, significance criteria, and reasoning as to why the project would not result in the substantial obstruction of a scenic view. No revisions to the FEIR are warranted as a result of this comment.

G-169: This comment cites an excerpt from the Steep Hillside Guidelines related to roads not extending above the 150-foot elevation contour and states the opinion that the proposed roadway connection will be above the 150-foot elevation contour.

This comment raises similar concerns as those provided in comment G-6; please see the response to that comment.

G-170: This comment quotes an excerpt from the DEIR and asks if the view from the park would be affected and generally if the view from the bisected eastern portion of the park would be affected.

The potential impacts of the proposed project on aesthetics are analyzed within Section 5.9, *Visual Effects and Neighborhood Character*, specifically within Section 5.9.5. As detailed therein, within the context of the substantial development occurring at the Quarry Falls site and other existing development in the vicinity of the project site, the inclusion of a relatively small segment of roadway (460 feet long by 120 feet wide, which includes landscaping and pedestrian facilities in this width) would be minimally discernible from the surrounding area, particularly when viewed from the valley floor, and would be within the visual character of the existing urbanized area where vehicles are typically present—along the I-805, Phyllis Place, and roadways within the Quarry Falls development—to serve the existing development in these areas. The future presence of vehicles where there is currently a roadway and nearby freeway access would not represent a change in the existing visual character.

Furthermore, implementation of the proposed project would generally improve upon the existing condition, which is currently a disturbed and graded hillside by incorporating California native landscaping, including trees. Moreover, the roadway would still permit the same amount of parkland along Phyllis Place. Finally, based on recent CEQA case law, changes in community character are considered a social and psychological issue and not an environmental issue subject to CEQA (*Preserve Poway v. City of Poway*, 245 Cal.App.4th 560). No changes to the EIR are required.

G-171: This comment states that a huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution, for example). This comment also asks to discuss how the road would not strongly contrast with the surrounding topography, how it would not be a change in scale in comparison to the low density housing residential zoning, why impacts would be less than significant, and perceived access issues from the Abbotshill community and the impact on neighborhood character.

Please see the response to comment G-170 regarding the potential impacts of the proposed project on aesthetics. The DEIR adequately details potential impacts associated with noise and air quality (please see Sections 5.3 and 5.4, respectively). Parking and other “quality of life” issues are not issues analyzed under CEQA unless attributed to a physical impact on the environment. No changes to the FEIR are warranted as a result of this comment.

G-172: This comment states that the roadway connection doesn't alleviate congestion in the long-term scenario and provides tables that are purportedly based on the traffic analysis.

This comment does not address the adequacy of the analysis within the DEIR. It should be noted that the traffic impact analysis was developed based on where the roadway connection would redistribute 50 or more trips and thus inherently would potentially result in impacts. However, as demonstrated by the VMT analysis, the proposed project would reduce VMT within the study area and within the region, thus resulting in reduced emissions from vehicles.

G-173: This comment states to refer to previous sections of the comment letter, and asks if there is information that is updated, if the Cumulative Impacts section will be revised to reflect the new information.

The cumulative impacts section does not require any revisions based on previous comments within this letter. No revisions to the FEIR are warranted as a result of this comment.

G-174: This comment asks if Table 6-2 is up-to-date as of March 2017 and notes that there are some projects in Grantville/Allied Gardens (e.g., River Park and Centrepont).

Table 6-2 is up to date and reflects the cumulative projects within the vicinity of the project site as of March 2017. There are projects from the communities of Grantville and Allied Gardens within this table, as the City made its best effort to capture projects within the general vicinity of the project site. No revisions to the FEIR are warranted as a result of this comment.

G-175: This comment states that there is a proposal to redevelop the Qualcomm Stadium site and that people attending events use Serra Mesa streets to travel from I-805 to the stadium.

Please see the response to comment G-67.

G-176: This comment asks if development can occur along Mission Center Road from Aquatera to Murray Ridge Road. It states that a property owner has contacted the Serra Mesa Planning Group about changing the zoning. It also asks what the impact would be.

Please see the response to comment G-62. The cumulative traffic analysis takes into account what "buildout" of each community plan area would be. If a certain, speculative project were to require a General Plan Amendment or change in zoning, it would be required to undergo its own discretionary review. The cumulative analysis factored in projects that have a pending development application. As this speculative project did not have a pending development application, it was not included within the list of cumulative projects. No revisions to the FEIR are warranted as a result of this comment.

G-177: This comment asks if the Mission Village Shopping Center redevelopment project is included in the list on Table 6-2.

Please see the response to comment G-62. The Mission Village Shopping Center was approved around 2004-2005 and was therefore included in the traffic analysis. No revisions to the FEIR are warranted as a result of this comment.

G-178: This comment asks to discuss the impact a roadway connection which creates more congestion near the freeways will have on an adopted emergency plan at Kaplan Drive/Aperture Circle if it exists or were developed.

Emergency access exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive and that Kaplan Drive provides bicycle and pedestrian access. This clarifying information has been added to the FEIR (see Section 5.2). The addition of this information does not affect the conclusions reached within the DEIR. As detailed within Section 7.7 of the DEIR, in accordance with the City's CEQA Significance Determination Thresholds, the following issue provides guidance to determine potential significance of impacts on public services and facilities: "Would the proposed project have an effect upon, or result in a need for new or modified government services in, any of the following areas: fire/life safety protection; police protection; schools; maintenance of public facilities, including roads, parks, or other recreational facilities; and libraries?" As further detailed within Section 7.7, the proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for fire-rescue or police services.

The roadway connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection. Concerning pedestrian and bike accessibility, the proposed roadway connection provides a more direct route from the southeastern portion of Serra Mesa (namely Phyllis Place/Murray Ridge Road) for cyclists and pedestrians to then utilize bike lanes on Via Alta and Franklin Ridge Road, or vice versa.

G-179: This comment asks that if there is any information that is updated related to the Public Services and Facilities sections and any reference to the park at Phyllis Place of this letter, if the Cumulative Impacts section will be updated.

The potential impacts of the proposed roadway connection on the proposed Phyllis Place Park (which has not been constructed) was adequately analyzed within the DEIR. No update or revisions to Chapter 6, *Cumulative Impacts* are warranted as a result of this comment.

G-180: This comment states that there is an existing emergency access between Aperture Circle in Civita and Kaplan Drive in Serra Mesa. This comment asks if this information will be included in Chapter 7. This comment also asks if the Fire-Rescue Department specifically stated that they support this roadway connection. Finally, it asks if an analysis conducted to determine the difference in response time using the roadway connection the Aperture Circle/Kaplan Drive access that already exists and if the difference in response time is significant.

Please see the response to comment G-178; this information was added to Section 5.2, *Transportation and Circulation*. The fire department stated that the project would provide another access route that would improve response times. As detailed within the Traffic Study prepared by KOA, the response times would improve by 17 minutes.

G-181: This comment asks if any changes would be needed to the fiber optics located in this area.

The DEIR adequately details the environmental impacts of the gas line relocation. Other underground utilities may be present and may require relocation, however, this would occur within the footprint of the project site and prior to the issuance of a final grading permit in coordination with other utility providers.

G-182: This comment asks if SDG&E was consulted to determine if a street connection would impact maintenance of high power lines.

Please see the responses to comments within Letter I. The proposed project would not impact the maintenance of existing overhead power lines.

G-183: This comment asks if the construction of the roadway connection and/or the widening of Phyllis Place would impact the gas line and if relocation would be needed. It also asks what the risks to the gas line are during roadway construction and/or, if required, during relocation. This comment asks that if increased traffic on Phyllis Place occurs if the high pressure gas line located in that area would be affected by the load on top of the pipe and/or weight. It also asks if an analysis was conducted of the risk for failure from vibrations.

As detailed in Chapter 3, *Project Description*, the proposed project would require the gas line to be relocated. As clarified in the FEIR (see Section 3.3.1.4), the gas line would not be removed from service after the portion of the gas line is raised within the easement. The existing gas line must be kept in operation while new portion is being raised. Once the new portion of the gas line is operational, the existing portion of the gas line will be filled with slurry and abandoned in place. This clarification does not result in any new or more severe significant impacts previously identified within the DEIR. The construction associated with the gas line would occur following coordination with SDG&E. Standard construction safety measures would be required during this process. No physical impacts to the environment would occur. In addition, the depth of the gas line was determined by engineers in coordination with SDG&E; please see the responses to the comments within Letter I. The gas line would be located at a sufficient distance to preclude the purported accident potential set forth by the commenter.

G-184: This comment generally states that it is difficult to make the significant effects determination when there's critical information that's missing and pertinent studies that were not conducted. It asks that if any of the items identified in any sections of this letter will have a significant effect if the Significant Effects Which Cannot Be Avoided section will be updated.

The DEIR adequately analyzes the significant impacts of the proposed project. Minor revisions that represent clarifying information have been made as part of the FEIR. However, the DEIR does not meet the criteria for recirculation as this does not represent "significant new information" (see Section 15088.5 of the CEQA Guidelines) because:

(1) No new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) No substantial increase in the severity of an environmental impact would result.

(3) There was no feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The DEIR was not "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

G-185: This comment refers to the four questions posed by City Council as part of City Council Resolution 304297 and asks if these questions had been used as the project's objectives instead of the objectives selected by City Staff, what the conclusion would be for each alternative.

Please see the response to comment G-14 and G-16 for a discussion of how the project objectives were formulated and where the four questions raised by the City Council are addressed within the DEIR. Additionally, the DEIR is only required to analyze the project alternatives' relationship to the project's CEQA objectives, which were formed using the four questions posed by the City Council as a backbone. No changes to the FEIR are warranted as a result of this comment.

G-186: This comment states that Table 9-1 doesn't list: Results in a negative aesthetic site or project and results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. It further states that the project is a roadway creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is permanent and substantially changes the character of the area.

Please see the responses to comments G-170 and G-171.

G-187: This comment states that the No Build/Remove from Mission Valley Community Plan Alternative doesn't consider the following with regards to the first project objective: Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge; a minimum of one trail for pedestrian and bike access will be built between Civita and Phyllis Place Park with or without the road; and that pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.

As detailed in Section 3.1 of the DEIR, the first project objective fully states: Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter; however, the fact remains that this alternative does not fully meet the first project objective of providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. Mission Center Road does not provide this direct access. The trail to be constructed would not allow bike access. The access point at Kaplan Drive does not allow for passenger vehicles. Finally, the proposed roadway connection cannot be removed from the Mission Valley Community Plan without the full impacts being analyzed under CEQA. Therefore, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative. No revisions to the FEIR are warranted as a result of this comment.

G-188: This comment states that the No Build/Remove from Mission Valley Community Plan Alternative doesn't consider the following with regards to the second project objective: gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicles accessing I-805 which will limit the mobility for the homes west of Franklin Ridge, and the improvement to Mission Center Road if roadway connection isn't approved.

As detailed in Section 3.1 of the DEIR, the second project objective fully states: Improve local mobility in the Serra Mesa and Mission Valley planning areas. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter;

however, the fact remains that this alternative does not fully meet the second project objective of improving local mobility. “Mobility” is not defined as the movement of vehicles; rather, it is generally defined as balancing all modes of transportation within the circulation network. The proposed project would provide a direct connection from Phyllis Place to Friars Road for motorists, pedestrians, cyclists, and potentially a bus route (if MTS so decides). The No Build/Remove from Mission Valley Community Plan Alternative would not improve local mobility within the vicinity of the project site, as there would not be a direct connection from Phyllis Place to Friars Road for all modes of travel. Although there would be significant LOS impacts within the Near- and Long-Term Scenarios, that does not translate into a significant “mobility” impact. Therefore, as adequately concluded within the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative. No revisions to the FEIR are warranted as a result of this comment.

G-189: This comment states that the No Build/Remove from Mission Valley Community Plan Alternative doesn’t consider the following with regards to the third project objective: options exist with Mission Center Road and Mission Village Drive. The comment also states to refer to the bar chart analysis that shows the roadway connection for the most part does not alleviate traffic congestion in Serra Mesa and Mission Valley and worsens the congestion in Serra Mesa.

As detailed in Section 3.1 of the DEIR, the third objective fully states: Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter; however, the fact remains that this alternative does not fully meet the third project objective as it would not improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. This is demonstrated by the VMT analysis (see DEIR Appendix F), which shows that the proposed project would reduce VMT. Therefore, as adequately concluded within the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative. No revisions to the FEIR are warranted as a result of this comment.

G-190: This comment states that the No Build/Remove from Mission Valley Community Plan Alternative doesn’t consider the following with regards to the fourth project objective: emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.

As detailed in Section 3.1 of the DEIR, the fourth objective fully states: Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter; however, the fact remains that this alternative does not fully meet the fourth project objective as it would not improve emergency access as the bollards that exist along Kaplan Drive/Aperture Circle would still remain, thus slightly increasing emergency responder time. It also would not improve evacuation route options for motorists within Civita as it would not provide a direct access route for those residing in the northern portion of Civita. Therefore, as adequately concluded within the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative. No revisions to the FEIR are warranted as a result of this comment.

G-191: This comment states that the No Build/Remove from Mission Valley Community Plan Alternative doesn't consider the following with regards to the fifth project objective will create an unsafe situation that is significant and unavoidable and refers to MM-TRAF-19 within the DEIR.

As detailed in Section 3.1 of the DEIR, the fifth objective fully states: Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter; however, this alternative does not fully meet the fifth project objective as it would not provide a street. Therefore, as adequately concluded within the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative.

Furthermore, although the DEIR identified a significant impact for motorists exiting or the City View Church, this is due to the church being privately owned. The City and/or the applicant that implements the project cannot force a private entity with its own Conditional Use Permit (CUP) to relocate the driveway or preclude left-hand turns. The City will continue to work with the applicant and the City View Church to determine a reasonable solution for motorists exiting City View Church. However, at the environmental analysis stage of the project, the City identified a significant and unavoidable impact, as it cannot unilaterally determine a solution for a private property. No revisions to the FEIR are warranted as a result of this comment.

G-192: This comment quotes an excerpt from the DEIR related to the City's Climate Action Plan (CAP) and Bicycle Master Plan including the proposed roadway connection in their assumptions. The commenter requests the citation of the reference in the City's CAP that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley.

The City's CAP does not specifically include any projects. The CAP utilized traffic modeling from the San Diego Association of Governments (SANDAG), which includes planned roadways. The proposed roadway connection was included within this modeling. Therefore, the No Build/Remove from Mission Valley Community Plan Alternative would need to be fully analyzed for potential conflicts with the CAP and if it would affect the conclusions reached within the CAP. No revisions to the FEIR are warranted as a result of this comment.

G-193: This comment asks to cite the reference in the Bicycle Master Plan that describes that the proposed roadway connection is included in its assumptions.

Please refer to Figure 6-2: San Diego Bicycle Master Plan that is available on the following web page within the City's web site:

https://www.sandiego.gov/sites/default/files/legacy/planning/programs/transportation/mobility/pdf/bicycle_master_plan_final_dec_2013.pdf

The comment also states that there will be a bike path with or without the road. There will not be a bike path under the No Project Alternative, only a pedestrian trail as described in the Quarry Falls Specific Plan. No revisions to the FEIR are warranted as a result of this comment.

G-194: This comment states that the Mission Valley Community Plan is in the process of being updated. It asks if an environmental analysis be needed for this community plan update process. It also asks if the removal of the road connection from the Mission Valley Community Plan be made during this update process.

The Mission Valley Community Plan Update is in process and will require an EIR. The removal of the roadway connection could be included within that EIR if the City decides to include it; however, this has no bearing on the alternative being able to meet the project objectives. As previously detailed in comments G-187 through G-190, the alternative does not meet the project objectives.

G-195: This comment states that there are inconsistencies within the Mission Valley Community Plan that would require community plan amendments and quotes a policy from page 56 of the Mission Valley Community Plan.

The proposed project would not require an amendment to the Mission Valley Community Plan; the Mission Valley Community Plan recommends including a roadway connection as previously detailed in the response to comment G-4. No revisions to the FEIR are warranted as a result of this comment.

G-196: This comment states that the Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

This policy pertains to the Franklin Ridge Road within Civita, not the proposed roadway analyzed within the DEIR that would connect Phyllis Place to Franklin Ridge Road and Via Alta. No revisions to the FEIR are warranted as a result of this comment.

G-197: This comment quotes a policy from page 124 of the Mission Valley Community Plan and states that the No Build/Remove from Mission Valley Community Plan Alternative meets the project objectives and should be analyzed.

The policy quoted by the commenter applies to private development, not roadways or other public facilities. As detailed in the responses to comments G-187 to G-191, this alternative does not meet the objectives of the proposed project as concluded in the DEIR. No revisions to the FEIR are warranted as a result of this comment.

G-198: This comment states the opinion that many of the issues discussed in previous comments related to the No Build/Remove from Mission Valley Community Plan Alternative section apply to the No Project comments. The comment states that Mission Center Road provides multi-modal linkage between Serra Mesa and Mission Valley.

This comment is similar to comments G-187 through G-191; please see the responses to those comments.

G-199: This comment quotes a conclusion from the DEIR and asks to describe the criteria used to reach the “greater” conclusion with regards to the land use impacts under the No Project Alternative.

Please refer to Section 9.5.1.1 of the DEIR:

Therefore, while the No-Project Alternative would not interrupt the park or result in disturbance to steep slopes, it would not provide a connection between communities or resolve the inconsistency between community plans. It would also not be consistent with the City’s CAP, resulting in an increase in VMT and associated emissions. Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project.

No revisions to the FEIR are warranted as a result of this comment.

G-200: This comment asks that if inconsistencies in the Mission Valley Community Plan that probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, if the impacts would be considered greater.

The proposed project does not require any amendments to the Mission Valley Community Plan. The linkages cited by the commenter are existing roadways that do not provide a direct connection for those within the vicinity of the project site. As described in the response to comment G-199 above, the No Project Alternative would result in greater impacts on land use than the proposed project due to the inconsistency with the City's CAP. No revisions to the FEIR are warranted as a result of this comment.

G-201: This comment summarizes the commenter's opinions that the alternatives analysis within the DEIR did not consider a number of factors and asks if the conclusions will change as a result.

Please refer to the responses to comments G-187 through G-200. Chapter 9, Alternatives, of the DEIR, adequately analyzes potential alternatives and accurately details the potential impacts of the alternatives that were analyzed.

The comment also asks that if the mitigable impacts that will probably not be implemented are considered, what the outcome would be. It is not clear what the commenter is asking or inferring. The DEIR details mitigation measures where significant impacts are identified. As part of the FEIR, an MMRP has been prepared that the applicant will be required to adhere to and implement. As detailed in Section 5.2, *Transportation and Circulation*, some traffic mitigation measures FEIR are considered unlikely to be implemented due to the removal of bike lanes or other conflicts with City policies; this was made clear within the analysis of the DEIR in that it was stated that the DEIR assumes that the measure would not be implemented. The DEIR factored the mitigation measures and determination of impacts into the alternatives analysis. No revisions to the FEIR are warranted as a result of this comment.

G-202: This comment asks that if an analysis of air quality in the Hye Park condominiums is conducted and shows a significant impact without the street connection, will the result be added and discussed.

The comment refers to air quality *without* implementation of the proposed project. The purpose of the DEIR is to assess potential impacts associated with project implementation. As such, a quantitative air quality analysis was not conducted for without project conditions. However, air quality conditions without implementation of the proposed project is discussed under the No Project Alternative. Further analysis of the No Project Alternative is included within Section 9.5.1 of the DEIR. As detailed in Section 9.5.1, the No Project Alternative would result in greater impacts than the proposed project because regional VMT would increase under this alternative. The increase in regional VMT would likewise increase air pollutant emissions associated with vehicle trips. As a result, air quality impacts associated with the No-Project Alternative would be greater than air quality impacts that would result from the proposed project. No changes to the FEIR are warranted as a result of this comment.

G-203: This comment states the opinion that the No Project Alternative would meet most of the project objectives and refers to the previous discussion of the No Build-Remove from Mission Valley Community Plan Alternative.

This comment is similar to previous comments detailed above. Please see the responses to comments G-187 through G-200.

G-204: This comment again mentions the policy from page 56 of the Mission Valley Community Plan. This comment refers the reader to the Transportation/Circulation and Parking section of the comment letter and that questions are raised about the validity of the Community Access data. It also asks that if this data is revised, if the conclusion would change within the analysis of Alternative 2. It also asks if the City Council resolution is used for the objectives if that would change the analysis.

No revisions to the community access data are warranted and no revisions to the Alternative 2 analysis are warranted. Please see the responses to comments G-187 through G-200. No revisions to the FEIR are warranted as a result of this comment.

G-205: This comment regarding the Environmentally Superior Alternative states the opinion that the conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities, then cites two examples of what the commenter believes are linkages. This comment again cites the policy from page 56 of the Mission Valley Community Plan.

This is not correct. The DEIR fully details the reasoning as to how and why the environmentally superior alternative was determined. Please refer to the full discussion under Section 9.5.3 of the DEIR:

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. When the environmentally superior alternative is the No-Project Alternative, CEQA requires that another alternative be identified. As indicated in the comparative analysis on the pages that preceded, the No-Project Alternative reduces impacts within several issue areas—such as biological resources, historical and tribal cultural resources, and visual effects—and is therefore identified as the environmentally superior alternative. It should be noted, however, that these impacts would be mitigated to less-than-significant levels under the proposed project.

However, because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative. For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative. This alternative would slightly reduce impacts associated with construction (i.e., biological resources, historical and tribal cultural resources) due to the narrower roadway and shorter duration of construction.

It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.

Please also see the responses to comments G-187 through G-200. No revisions to the FEIR are warranted as a result of this comment.

G-206: This comment states the opinion that the DEIR does not support the conclusion that both alternatives would result in significant and unavoidable impacts that would not result under

implementation of the proposed project, then refers the reader to the previous comments on alternatives and the traffic impacts for all intersections identified in the EIR.

Please see the response to comment G-205. The DEIR correctly concludes that the two alternatives fully analyzed would not decrease VMT within the study area or the region. This does not have any correlation to LOS as mentioned by the commenter. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project due to the increase in VMT and associated vehicle emissions. No revisions to the FEIR are warranted as a result of this comment.

G-207: This comment states that the impacts of mitigation and the feasibility of implementation are not discussed, and expresses the opinion that the information in Section 9.5.3 of the DEIR does not support the conclusion that the No Project Alternative would result in greater traffic impacts than the proposed project.

Please see the responses to comments G-205 and G-206. Additionally, the FEIR has been updated to discuss the potential effects of the mitigation measures. However, as analyzed, no new or more severe significant impacts would occur and no new mitigation is required. Please refer to Section 5.2, *Transportation and Circulation*, for the clarification to the analysis. Furthermore, an EIR is not required to analyze the feasibility of implementing mitigation measures. Rather, the Findings for each significant impact discusses the feasibility of all mitigation measures proposed. The draft Findings are available for review (at the time the FEIR is released). No revisions to the FEIR are warranted as a result of this comment.

G-208: This comment excerpts the portion from Section 9.5.3 of the DEIR that states "...these impacts would be mitigated to less-than-significant levels under the proposed project." The comment then states the opinion that many of the mitigations are infeasible.

This is not entirely correct. As previously detailed, some mitigation identified within Section 5.2, *Transportation and Circulation*, were assumed to not be implemented for the various reasons described therein, and the DEIR accurately discloses that fact by concluding a significant and unavoidable impact. Mitigation identified for significant project impacts on biological resources, historical and tribal cultural resources, and visual effects would be implemented and would reduce impacts to less than significant. No revisions to the FEIR are warranted as a result of this comment.

G-209: This comment cites an excerpt from the Environmentally Superior Alternative discussion in the DEIR related to VMT, and asks if it is determined that the VMT study is inaccurate, what the impacts would be on the cited conclusions. DEIR

Please see the response to comment G-206. The DEIR correctly concludes that the two alternatives fully analyzed would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project due to the increase in VMT and associated vehicle emissions. No revisions to the FEIR are warranted as a result of this comment.

G-210: This comment is a summary of all the main concerns raised by the commenter, which the commenter refers the reader to the full comments on the preceding pages. No new issues are raised in this comment. Please see the responses to all comments on the preceding pages for the responses to these summary comments.

G-211: The comment states, in general terms, that corrections requested by the commenter during the NOP and previous DEIR public review were not made in the recirculated DEIR. The commenter provides a general opinion that the recirculated DEIR is inadequate and the mitigation measures are infeasible. The comment concludes by indicating anticipation for reviewing the City's responses.

This comment is a general statement expressing opposition to the proposed project and does not raise specific issues or evidence that challenges the recirculated DEIR's adequacy. Please see the response to comment F-2. DEIR

G-212: This comment is merely a collection of accompanying documentation to support comments provided on preceding pages. It includes a list of references, City Council Resolution #304297, a summary table modified from the recirculated DEIR related to long-term cumulative impacts with and without the project that the commenter has modified, several aerial views of the project area and project site, a figure of trails from the Quarry Falls Program EIR, a statement of opposition from the Serra Mesa Planning Group with reasons that were stated previously in the comment letter, and a summary of the commenter's opinion of the project's impacts that were previously stated in the comment letter.

Responses are provided to all of the comments that are related to these accompanying documents. Please see the responses to comments G-2 through G-211.

From: Bryce Niceswanger <stoptheroad@yahoo.com>
Sent: Tuesday, May 30, 2017 2:11 AM
To: Morrison, Susan; PLN_PlanningCEQA; sherrilightner@sandiego.gov; CouncilMember Lorie Zapf; toddgloria@sandiego.gov; Councilmember Myrtle Cole; Councilmember Mark Kersey; CouncilMember Chris Cate; Councilmember Scott Sherman; CouncilMember David Alvarez; martiemerald@sandiego.gov; Mayor Kevin Faulconer; Councilmember Barbara Bry; Councilmember Christopher Ward; CouncilMember David Alvarez; Councilmember Georgette Gomez
Subject: Re: Recirculated Draft EIR - Serra Mesa Community Plan Amendment Roadway Connection Project / Project No. 265605
Attachments: Petition signatures_371.pdf; Petition Comments_1467593307 (1).pdf; Petition_CityView_Signed 13.pdf

Dear Susan Morrison, San Diego City Council Members and Mayor Kevin Faulconer,

The attached documents include a Petition at change.org signed by 371 +13(on paper) =384 people as of 6:00pm May 29th, 2017. Also attached are comments from Community Members that they would like to be addressed and included in the Final EIR for the Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048.

Thank you,
Stop the Road

H-1

On Wednesday, March 29, 2017 11:19 AM, "Morrison, Susan" <SIMorrison@sandiego.gov> wrote:

RECIRCULATED DRAFT EIR

Please see the link below for the Serra Mesa Community Plan Amendment Roadway Connection Project Recirculated Draft EIR and Appendices, Project No. 265605, which was distributed for public review starting today, March 29, 2017, and ending May 15, 2017.

See under "Draft CEQA Documents", March 29, 2017: <https://www.sandiego.gov/planning/programs/ceqa#>

Susan I. Morrison, AICP
Associate Planner
City of San Diego
Planning Department

T (619) 533-6492
www.sandiego.gov

Stop The Franklin Ridge Road Connection

Recipient: PlanningCEQA@sandiego.gov, Sherri Lightner, Scott Sherman, Todd Gloria, Myrtle Cole, Mark Kersey, Chris Cate, Lorie Zapf, David Alvarez, and Martie Merald

Letter: Greetings,

Reject the Serra Mesa Community Plan Amendment Street Connection Project No. 265605

We the Undersigned are in opposition of the Franklin Ridge Road connection and the initiative to amend the Serra Mesa community plan to include it.

H-2

- Do NOT recommend Serra Mesa Community Plan be amended to include a street connection on the basis that the PEIR does not meet project objectives to improve traffic and shows significant negative impacts on the environment for traffic, noise, and pollution.

- o The PEIR is NOT complete and NOT in compliance with CEQA. Alternatives are not comprehensive. Information is contradictory in multiple locations, fundamentally inadequate and conclusory. Emergency, pedestrian and cyclist access already exists in study area on Kaplan Drive, and more will be provided with trail through the park on Phyllis Place connecting the two communities.

- o DENY proposed CPA. CPA does not meet proposed goals and does not benefit the residents of either community.

H-3

- Recommend that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.

Project Objectives of the proposed PEIR and reasons why it does not meet these objectives are as follows:

- 1) Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.

H-4

~Recommend alternative that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.

- This amendment would not resolve the inconsistency between community plans as it also contradicts Mission Valley's Community Plan (page 55) "Streets serving new development should be connected to the road network and not to

H-4
cont.

major streets serving residential areas in the mesas.” The project objectives are not met and in actuality the proposal is less compliant with the City’s General Plan and Community plans than the no project alternative.

2) Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could:

a) Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas.

- ~There are 5 more significant Connection Intersection Condition delays with the road than without; this does not constitute improved overall circulation in the Serra Mesa and Mission Valley planning areas. This undermines the pedestrian friendly residential community characteristics of our neighborhoods.

- Significant Delays With Connection Appendix C corrected 48/206 (page 41)

1. Murray Ridge Rd and Sandrock Rd PM 58 minutes (25min with mitigations)

2. Murray Ridge Rd & I-805 NB Ramp PM 149 minutes (56min with mitigations)

3. Murray Ridge Rd & I-805 SB Ramp AM 80 minutes, PM 404 minutes (21/113min)

4. Qualcomm Way & Friars Rd EB Ramp PM 61 minutes (49min with mitigations)

H-5

5. Qualcomm Way & Friars Rd WB Ramp PM 77 minutes (41min with mitigations)

6. Via Alta and Franklin Ridge Road AM 44 minutes, PM 96 minutes (39/54m)

- Significant Delays Without Connection Appendix C corrected

34&35/206 (page 27&28)

1. Mission Center Rd & Murray Ridge Rd/Phyllis Pl AM 57 minutes, PM 117 minutes

In the long term all the following 12 study items are BETTER WITHOUT the road connection *Very significant, within acceptable operation without Connection Roadway Segment

1. Phyllis Pl from I-805 SB Ramp to I-805 NB Ramp

2. Rio San Diego from Qualcomm Way to Rio Bonito Way

3. *Franklin Ridge from Via Alta to Civita

4. *Phyllis Pl from Franklin Ridge to I-805 SB Ramp

Intersection

5. Murray Ridge /I-805 SB Ramp

6. Murray Ridge/I-805 NB Ramp

7. Murray Ridge/Sandrock

8. *Franklin Ridge/Phyllis Pl

9. *Franklin Ridge/Via Alta AM

10. *Franklin Ridge/Via Alta PM

Freeway Ramp Meter

11. *I-805 NB Ramp at Murray Ridge Road

H-5
cont.

12. *I-805 SB Ramp at Murray Ridge Road

In the long term the following 3 study areas are better WITH the road connection

*Very significant, within acceptable operation with Connection Intersection

1. Qualcomm Way/Friars Road WB Ramp in PM only
2. *Mission Center /Murray Ridge AM
3. *Mission Center /Murray Ridge PM

Appendix C corrected 31/206 (page 24), Appendix C corrected 43 & 44/206 (page 36 & 37)

H-6

b) Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.

~Proposed CPA does not meet project objectives as the PEIR traffic analysis concluded unmitigable delays at the 805 onramps, 31-43 minutes with the connection versus the alternative of continuing to have less than 15 minute delays without the road connection, even with new developments, under the heaviest traffic times through the year 2035. Long Term (2035) With Connection Conditions Appendix C corrected 48/206 (page 41).

· Freeway

I-805 Freeway Mainline Condition is LOS F (AM & PM) with or without the road connection. I-805 is already heavily impact and there are no immediate plans to improve the area and in some cases it cannot be improved. "Where a mainline freeway impact is identified on the I-805 mainlines near the Murray Ridge Rd/Phyllis Place interchange no attempt to introduce a new freeway lane for mitigation has been offered, and that impact remains unmitigated." Appendix C corrected 7/206

· Ramps Conditions

WITH CONNECTION

· I-805 NB ramp at Murray Ridge Road – 43 minutes of delay (PM)

· I-805 SB ramp at Murray Ridge Road – 31 minutes of delay (PM)

WITHOUT CONNECTION, all ramps are calculated with less than 15 minutes of delay

Appendix C corrected 31/206 (page 24) and 50/206 (page 43, Table 5-4), (PEIR 244/317)

H-7

c) Allow for safe travel conditions for motorists, cyclists, and pedestrians along the street connection.

~The CPA does not support its conclusion for safe travel conditions although the no project alternative meets this objective with existing planned paths without vehicular traffic and lower stress to pedestrians and cyclists while not increasing the traffic as much shown on page 66/206 Appendix C corrected.

· Franklin Ridge Road "a four lane collector road including bicycle and

H-7
cont.

pedestrian facilities” to I805 SB is predicted to have 34,540 cars per day, PEIR page 1/317. According to Roadway Capacity Standards on page 66/206 (Appendix C corrected) that amount of cars is consistent with a Major Arteria or Prime Arteria not a collector street which Franklin Ridge Road is classified as.

- The CPA includes a class II bike lane which does not protect cyclists from cars like the current plan with a vehicle free bike path going through the park South of Phyllis Place connecting the two communities to the greater San Diego regional bike network, making the proposed CPA not as safe for cyclists as existing plan.

- The proposed CPA would limit mobility and community feel with the number of cars causing road delays of 40-96 minutes on Franklin Ridge Road the connection will be too busy to be safe for motorists, cyclist and pedestrians. Appendix C corrected 47&48/206 (page 40&41)

- The Serra Mesa Community Plan states “There is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers” (45/77 page 37).

- Mission Valley Transportation Plan states “Safety Pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles on 5/10 (page 38)” “Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike. In general, stress levels are high along most roadways in Mission Valley, regardless of the presence of bicycle facilities due to high traffic speeds, the high number of auto travel lanes, as well as the limited space given to the cyclists. 7/10 page 40, https://www.sandiego.gov/sites/default/files/4._transportation.pdf

H-8

d) Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

~Proposed CPA does not support improved emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas as stated on page 56/206 in Appendix C corrected: “Therefore, we see limited additional benefit to these two hundred plus homes for evacuation by having a road connection, and all of the other surrounding communities have multiple access or egress routes”.

- Kaplan Drive exists in this study area as an emergency access route and is not mentioned in the PEIR, this omission contradicts numerous pages in the PEIR. ~Proposed CPA does not improve circulation, traffic congestion, safety for travel including cyclist and pedestrians, or emergency access (Existing conditions are superior to projected Road Connection conditions with corrected information).

H-9

3) Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.

H-9 cont.	<p>~General Plan and Bicycle Master Plan are already implemented without CPA. There is existing interconnectivity between communities by way of Mission Center Road, Mission Village Drive, Kaplan Drive (Emergency, Cyclists and Pedestrians) and Phyllis Place Park that will have a walking and bike path.</p> <ul style="list-style-type: none"> • The proposed CPA conflicts with the General plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities, the proposed increase in traffic decreases safety for pedestrians and cyclists and does not increase connectivity as connectivity is already planned at connection location. • Mitigations include the removal of bicycle lanes in Serra Mesa in direct contrast to the city's bicycle master plan and environmental progress. The proposed CPA states "All mitigation measures contained in the Environmental Impact Report shall be made conditions of the project as may be further described below" PEIR 289/317. The PEIR concluded: <ul style="list-style-type: none"> • "Mitigation was determined infeasible for the following issue areas: transportation/circulation page 289/317." • 7 out of the 19 mitigations, which are conditions to approval of the CPA, are not recommended at all. • 3 of the 19 state: "Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), it is not recommended, and the impact would remain significant and unavoidable." All LOS F, With or Without the road: PEIR pages 116-118, 290-292/317 <p>4. Murray Ridge Road from Mission Center Road to Pinecrest Avenue 5. Murray Ridge Road from Pinecrest Avenue to Sandrock Road 9. Murray Ridge / Sandrock Road</p> <p>"4. Murray Ridge Road from Mission Center Road to Pinecrest Avenue: a. Murray Ridge Road from Mission Center Road Pinecrest Avenue shall be restriped consistent with a 4-lane Collector. i. Currently, Murray Ridge Road provides Class II bike facilities and onstreet parking. The proposed mitigation would either repurpose the existing right of way to provide four travel lanes by eliminating the bike lanes and on-street parking, or widen the roadway to accommodate four travel lanes and maintain Class II bike facilities and on-street parking. Widening the roadway would require removal of residences on both the east and west sides of Murray Ridge Road along the entire stretch of roadway segment. Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), it is not recommended, and the impact would remain significant and unavoidable." PEIR 290/317</p>
H-10	<p>For the aforementioned reasons this PEIR is incomplete and not in compliance with CEQA and must be denied. This PEIR does not meet the objectives and shows significant negative impacts on the environment for traffic, noise, and pollution.</p>

H-11

- Recommend that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.

Thank you for your consideration,

Comments

H-12

Name	Location	Date	Comment
Adam Gardner	San Diego, CA	2016-06-11	I am signing because the road connection will not be good for either community based on the findings of the PEIR.
Larry Wenell	San Diego, CA	2016-06-11	I purchased a home in the Civita neighborhood and overlook Via Alta. I purchased this home for the pedestrian friendly "smart" development with its walking trails and centrally located park. This connector project would effectively destroy the very premise of this community design .

H-13

Ron Yardley	San Diego, CA	2016-06-11	The PEIR is not complete and not in compliance with CEQA. It will turn the pedestrian-friendly, family-friendly residential new community of Civita into a traffic-jammed, dangerous, polluted, noisy shortcut to I-805 by dropping thousands of cars from a 4-lane connector road into two, narrow, median-dominated, bike-lane lined, two-lane roads not capable of handling this level of traffic. Via Alta, for instance, has residences, a park, and a future school closely abutting the street which will become a major nightmare of a thoroughfare. Please find alternate solutions. Thank you.
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H-14

Henry Johnson	San Diego, CA	2016-06-12	Safety first!
Mooney Sandra	San Diego, CA	2016-06-12	It will cause to many delays on an already busy road.
Peter Billow	San Diego, CA	2016-06-12	Simply because I intentionally bought into a quiet, safe neighborhood. Would not be here if I knew our Main Street would be used for freeway access.
Vincent Castiglione	San Diego, CA	2016-06-12	The traffic will be a nightmare and the city does not seem to care.
Brittany Barroga	San Diego, CA	2016-06-12	My grandmother who is in her 80's loves on Ainsly Ct and it's safe in her neighborhood. She does not want traffic noise. I am also a long time resident since I was 6 and want my kids to live in a quiet quaint family friendly environment.
Timothy Fleming	San Diego, CA	2016-06-12	Who is asking for this? Why? What is the need to add such traffic on a one lane road through what was sold as an anti car, anti parking, pro pedestrian pet caring, walking, family community? If no need, why?
Andrea Chertkow	San Diego, CA	2016-06-12	Safe roadways and quality of live is important to me. I am also concerned about the accuracy of this study (for example, we already have an emergency access road at Kaplan Drive)
susie white	roma, Italy	2016-06-12	my parents and son live off phyllis and i grew up there. this proposal is preposterous and will only cause problems for a family community, while residents below have other alternatives.
Lorraine Hitchen	San Diego, CA	2016-06-12	Lorraine Hitchen
Jeffrey Houston	San Diego, CA	2016-06-12	Mission Center Road already serves the purpose of connecting the 805 to the Friars Road area of Mission Valley. The traffic that the proposed connector will bring through Civita will have an adverse effect on the quality of life for the residents of Civita.
James Warniak	San Diego, CA	2016-06-12	Via Alta is not suitable for proposed use. Result will be a very dangerous use of the street.

H-14
cont.

Name	Location	Date	Comment
J Tichenor	San Diego, CA	2016-06-12	<p>The Franklin Ridge Road proposal does not demonstrate SIGNIFICANT BENEFIT to the neighborhoods involved.</p> <p>Drivers already have an option in place now, and the proposal only potential saves just a few minutes of driving time at higher risk levels than current road options.</p> <p>Time to look at other options, the proposal is not worth the change at this time.</p>
Irma Villavicencio	San Diego, CA	2016-06-12	Irma Villavicencio
Lois Nelson	San Diego, CA	2016-06-13	4 lane road not needed thru a promised park.
Anita Palmer	San Diego, CA	2016-06-13	The findings appear to counter the argument that our communities will benefit from this road initiative -- and in fact will be negatively impacted. Stop using taxpayer money to discovered what has already been determined.
Robi Siers	San Diego, CA	2016-06-13	Negative traffic impact on Murray Ridge Road and surrounding neighborhood streets including Sandrick, Aero, Ruffin, and Mission Village Road.
Ling Ly	San Diego, CA	2016-06-13	The proposed connection will significantly impact residential streets (Via Alta & Franklin Ridge) that were never designed to handle such volume of traffic. The EIR is very biased in only favoring the connection but does not consider the impact to the neighborhood characteristics and other safety issues. Civita is supposed to be a pedestrian friendly community. The connection would contradict the objectives of the community by introducing tens of thousands of transient vehicles which do not belong.
joanne friedman herbert friedman	San Diego, CA	2016-06-13	This will destroy the Civita project as a walkable urban and green environment and turn it into a traffic congested area. Total common sense is lacking with no thought to the destructive consequences.
Robert Twomey	Seattle, WA	2016-06-13	My family lives in Serra Mesa and this new road is a bad idea.
Susan Buell	San Diego, CA	2016-06-13	To preserve safe pedestrian access to Civita, preserve residential neighborhoods, promote property values, preserve peace and quiet residential areas.
Princess alo	San Diego, CA	2016-06-13	My dog and I hike up and down via alta and civita blvd daily and we are opposed to this as it threatens our safety and the safety of other pets, pedestrians and cyclists. We really enjoy the peace and quiet and being able to cross the streets without the threat of being hit by a car.
Princess alo	San Diego, CA	2016-06-13	My dog and I hike up and down via alta and civita blvd daily and we are opposed to this as it threatens our safety and the safety of other pets, pedestrians and cyclists. We really enjoy the peace and quiet and being able to cross the streets without the threat of being hit by a car.
Princess alo	San Diego, CA	2016-06-13	My dog and I hike up and down via alta and civita blvd daily and we are opposed to this as it threatens our safety and the safety of other pets, pedestrians and cyclists. We really enjoy the peace and quiet and being able to cross the streets without the threat of being hit by a car.
Princess alo	San Diego, CA	2016-06-13	My dog and I hike up and down via alta and civita blvd daily and we are opposed to this as it threatens our safety and the safety of other pets, pedestrians and cyclists. We really enjoy the peace and quiet and being able to cross the streets without the threat of being hit by a car.
Joan Dillenbeck	San Diego, CA	2016-06-13	New housing projects don't care about exsisting home owners!!

H-15

H-16

H-17

H-18

H-19

Name	Location	Date	Comment
Mary Hart	San Diego, CA	2016-06-13	We already have significant traffic delays because of traffic coming up Mission Center Road. Mission Center Road is our main access to Mission Valley and this will be essentially unusable. I805 is our access to other freeways that will be totally unusable unless we want to add half hour or more to our travel time. This is an extremely bad plan for our well established community.
Clarence Moeller	San Diego, CA	2016-06-13	Franklin Ridge Road will overwhelm the existing Serra Mesa streets with traffic.
Paul Grandi	San Diego, CA	2016-06-13	It's unjust to ruin. Long established neighborhood by making it totally dysfunctional, it's not right!!!!'
Michael Janke	San Diego, CA	2016-06-13	To preserve the community's intended plan
Rose Davidson	San Diego, CA	2016-06-13	traffic, noise, pollution
John Chuckta	San Diego, CA	2016-06-13	I'm signing this petition because this road connection is bad for our community and children.
Sonia Hyncik	San Diego, CA	2016-06-13	I oppose the Franklin Ridge Road connection. Civita was marketed to us as a walkable, pedestrian friendly community, not a freeway off/on ramp which will be unsafe for residents, cause congestion, increase noise levels and will end up dividing this beautiful new community.
Cindy Canfield	San Diego, CA	2016-06-13	My neighborhood will be negatively impacted.
Rachael Noble	San Diego, CA	2016-06-13	I do not want the road!
Christy MICKEL	San Diego, CA	2016-06-13	our community at Civita was aimed at being a walking community. This project defies the founding concept of Civita. In addition the increased traffic will generate increased crime rate, pedestrians accidents. The negative impacts are endless on the environments and on the habitants. please reconsider the plan!
Virginia Hensley	San Diego, CA	2016-06-13	This would be a disaster for the Via Alta road and the residents. Having a school district which will be forthcoming will be dangerous. We have many people that cross these streets which will be accidents waiting to happen. Please reconsider alternate route.
Didier Beauvarlet	San Diego, CA	2016-06-13	I oppose the Franklin Ridge Road connection. Civita was marketed to us as a walkable, pedestrian friendly community, not a freeway off/on ramp which will be unsafe for residents, cause congestion, make traffic more difficult in the community (extremely hard to make a left turn on via Altana), increase noise levels and will end up dividing this beautiful new community in three separate zones as pedestrians will not be able to cross the two high traffic roads (Via Alta and Franklin ridge road).
Kathy Mcsherry	San Diego, CA	2016-06-13	Because the ENTIRE community does not want our quality of life affected!!!
Matt Kennedy	Berwyn, PA	2016-06-13	It is the right thing to do!!!
James Reichert	San Diego, CA	2016-06-13	I do not want thousands of cars driving through our walkable community. Current infrastructure does not support these additional vehicles access to the I805. This plan is decades old, and does meet the needs of the current Mission Valley/Civita population.
Bradley Hobson	San Diego, CA	2016-06-13	New plan will dramatically increase traffic in residential area
Jill Reichert	San Diego, CA	2016-06-13	I am not in support of a freeway connector through Civita. This will negatively impact the community and will not provide long term value to the area. I challenge our leaders to quit making poor decisions for Mission Valley and start making forward thinking long term decisions that include the future concepts of small village living promoting walkable, bikeable communities.

H-20

Name	Location	Date	Comment
Amanda Lettmann	San Diego, CA	2016-06-13	Connectors do not belong in neighborhoods. This will not increase the value of our homes and will bring, traffic, noise, and so forth. Better city planning is needed.

H-21

Nicole Howard	San Diego, CA	2016-06-13	The EIR is flawed with regard to impact from the connector. The report underestimates the negative impact in terms of safety and traffic. There is already an emergency fire entrance/exit. This was not included in the report and a pedestrian/bike path is part of Civita plan. This was not covered in the report. The report needs to be redone.
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H-22

Dick and Judy McEntyre	San Diego, CA	2016-06-13	This is extremely important to the Civita development and future Mission Valley development. This analysis is so thorough, accurate, and very alarmingly pointing out the PEIR fallacies and lack of common sense.
Kristofor Carnegie	San Diego, CA	2016-06-13	I do not agree with the plans for the connector. And I'm opposed to the traffic increase through my neighborhood.
Greg Blasic	San Diego, CA	2016-06-13	I do not want the road connection. I want to keep the quality of life that we currently have in Civita. This is disrupt our neighborhood and cause a lot more traffic and noise to our house being on Via Alta!
Theresa Davis	San Diego, CA	2016-06-13	There's already too much traffic on Murray Ridge during prime time traffic and it takes forever to get through the signal and onto the freeway! There's no reason that Sarah Mesa should lose property values abd quality of life in order to accommodate those in Mission Valley.
Brian MICKEL	San Diego, CA	2016-06-13	I am a home owner and concerned about the impact.
Haylie Canfield	San Diego, CA	2016-06-13	The road would block our entire neighborhood in with the traffic it would cause!
David Dolnick	San Diego, CA	2016-06-14	This plan imposes an undue hardship on the residents of Serra Mesa
Carl Demas	San Diego, CA	2016-06-14	This is not in the best interest of Serra Mesa.
bryan noar	san diego, CA	2016-06-14	The current plan has major flaws and threatens to have an overall negative effect on Mission Valley and Serra Mesa. It needs revision and refinement before being implemented. Furthermore, the Civita community is intended to be a walkable residential village, not a main thoroughfare for through traffic.
Alexis Hanson	San Diego, CA	2016-06-14	I absolutely oppose this connector. I moved to Civita to live in a walkable community. This connector will but cyclists (whom I am), children, pets, etc. in danger.
Brandon Swindell	San Antonio, TX	2016-06-14	That's bullshit.
Therese Smith	sd, CA	2016-06-14	I am signing this petition because I do not want my neighborhood to be the connector to Mission Valley. Poor planning on the City's part does not make an emergency on our part. Traffic patterns should have been addressed prior to the development. Plan Ahead!! I strongly oppose the Franklin Ridge Road connection. Thank you!
Bill Olson	San Diego, CA	2016-06-14	There is no way that the roads in Civita could work as outlet roads out of mission valley. Please send someone to look at these roads, and the high density neighborhoods they go through, and they will see the ridiculousness of this proposal.
Carrie Hobson	Escondido, CA	2016-06-14	The proposed Franklin ridge road and Phyllis place connections will be detrimental to the Civita master planned community. There are many questions for the EIR regarding traffic impact, safety concerns, planned freeway connector improvements existing in Mission Valley that will negate the necessity for Franklin Rigde Rd connector.

Name	Location	Date	Comment
Patrick Justman	San Diego, CA	2016-06-14	The road should not be connected as it will (1) ruin the village vibe of the Civita community; (2) introduce a dangerous thorough way to a quiet area and put pedestrians at risk; (3) decrease home values throughout Civita; and (4) not enhance the flow of traffic through Mission Valley as there are more than several alternate routes that are more than adequate.
Timothy Schu	San Diego, CA	2016-06-14	This road is unnecessary given that Mission Center, Road is nearby and serves the same purpose. The new road will be Be dangerous to the residents of Civita.
Brooke Hubbard	San Diego, CA	2016-06-14	Via Alta and Franklin Ridge Road are residential streets. Via Alta has only 2 lanes and cannot support the traffic and was given anEIR rating of an F. Those reports did not include a study done when the elementary school is built. If these roads are given a fail how can we support it. Via Alta is a two lane collector for multi- family residential streets
Michael Hubbard	Carlsbad, CA	2016-06-14	This road connector should never have been considered being Via Alta and Franklin Ridge Roads are 2 lane multi family roads.
James Carney	San Diego, CA	2016-06-14	I've lived in this neighborhood since 1965 and object to the new development as an infringement on this quiet little community.
Will Leingang	San Diego, CA	2016-06-15	This isn't a plan. It doesn't make sense to just open up more paths to mission valley and make more "shortcuts" through quiet residencial areas.
Elizabeth Rush	San Diego, CA	2016-06-15	Civita was intended to be a walkable residential neighborhood community, not a high-volume traffic thoroughfare.
Carlo P	San Diego, CA	2016-06-16	We bought into this neighborhood by the fact that we were sold on the walkable aspect of it. If this road goes forward you takeaway our freedom to walk by turning our streets into a drag strip considering people in San Diego has no concept of speed.
Rebecca Kiperts	San Diego, CA	2016-06-16	I live on the Mission Village side and the Serra Mesa side already suffers amazing traffic jams, higher crime rate,and much higher density. Franklin will ruin the park and make everything worse.
eligio rollo	San Diego, CA	2016-06-16	I do not want this connecting road built as it will create too much traffic in a residential neighborhood.
Evan Franz	San Diego, CA	2016-06-16	I do not want this connection and increased traffic in my neibofhood
Gabriela Surpi	San Diego, CA	2016-06-17	I oppose this plan amendment. The only goal of the road connection is to give Mission Valley access to I-805 by sending traffic through residential streets, causing congestion, delays, noise and pollution to nearby residents. As many others, we bought our property in a residential area of Serra Mesa because we enjoy the quiet character of the neighborhoods. We are tax payers and expect the City will understand, respect and preserve this choice of lifestyle and the identity of our community. Please stop the proposition to build this road connector.
Joshua Jamison	San Diego, CA	2016-06-17	I have kids and I do not need any more traffic flowing through our CIVTA community!!!
Lauren Feiner	san diego, CA	2016-06-17	I want to keep Civita a nice quiet family friendly neighborhood
Adam Bunn	San Diego, CA	2016-06-17	I don't want increased traffic through my neighborhood.
Ryan Braidwood	San Diego, CA	2016-06-17	I don't want to see our walkable community be ruined by a direct freeway connector to the 805. Mission Center Rd already serves as a valuable connector and doesn't have any homes directly on it.
Anne Law	San Diego, CA	2016-06-17	I am a homeowner at Civita and I am opposed to this road connection.

Name	Location	Date	Comment
Derek Abel	San Diego, CA	2016-06-18	I'm signing this petition to bring awareness to the negative effects the Franklin Ridge Road Connection will have on Civita. The connection will bring an influx in crime, it will cause several accidents, and there will be speeding in a community that was intended for walking and family oriented activities.
Laura Johansen	San Diego, CA	2016-06-18	I believe extra traffic through our family community would be potentially dangerous to kids and pets, and also undesirable for the Civita community.
william graham	San Diego, CA	2016-06-18	This road will destroy the peace of both Serra Mesa and also Civita./most of the people using it will have no connection ti either community. If you must have a road, go with Donna Frye's suggestion, make a blocked fire road so that fire may lone fire station/training/repair may have access if needed access
Leslie Johnson Leech	San Diego, CA	2016-06-19	A road into our neighborhood from Friars' Rd. would be a disaster in terms of traffic, noise, pollution and safety. This proposal absolutely needs to be rejected!
Amy Antoshak	San Diego, CA	2016-06-19	There's too much traffic as it is now.
Pamela Morales	San Diego, CA	2016-06-19	Ilm opposed to have our quiet neighborhood exposed to more crime and traffic. Already seeing more homeless strangers walk through the streets since they started building Civita.Scary!!!
William Watson	San Diego, CA	2016-06-19	I oppose the Franklin Ridge Road because it will not improve traffic conditions in the Serra Mesa community. When our family bought into this neighborhood, we love the quiet, ease of access to freeways. It is not Serra Mesa's responsibility to take on Civita's overdevelopment of stacked multi level homes, that only have limited parking and now they are parking their vehicles up here in our neighborhood. Please do not allow the road to connect their problems into our Serra Mesa neighborhood.
Lesley Marples	San Diego, CA	2016-06-19	I am signing this petition because I do not agree that the Franklin Ridge Road needs to be built. The massive amount of projected traffic cannot be mitigated. Furthermore, there is no reason for Mission Valley community or the San Diego City Council to vote for this connector and thereby threaten the health and welfare of Serra Mesa and Civita's residences when the solution to Mission Valley's traffic issues is not 1/4 mile away - the 163 Freeway!!
Matt Shirley	San Diego, CA	2016-06-19	I live in the area that will be damaged by the road.
Allen Wu	San Diego, CA	2016-06-19	I oppose the Franklin Ridge Road connection
Linda Johansen	Wheaton, IL	2016-06-19	Civita is a planned family community and should not become endangered and disrupted with a freeway off ramp. It is an illogical. decision. The noise and congestion would completely change the complexion of the community. People have a right to reside and raise their families in a peaceful place. Please protect Civita.
Ann Finster	Phoenix, AZ	2016-06-20	My cousin lives in this neighborhood. Please do not degrade his quality of life! ▯
Kathy Collier	San Diego, CA	2016-06-20	The proposed CPA does not improve circulation, traffic congestion, safety for travel including cyclist and pedestrians, or emergency access (Existing conditions are superior to projected Road Connection conditions).
Dennis Tornabene	San Diego, CA	2016-06-21	I do not want the quality of this neighborhood adversely affected by the increase in noise pollution, traffic congestion, and degradation of the quality of life which attributes I relied upon and were major contributors to my decision to buy my home in this lovely community.

H-22
cont.

Name	Location	Date	Comment
Andrew LeBeau	San Diego, CA	2016-06-21	<p>Civita should remain a pedestrian-friendly community. There is no need for the proposed connector road.</p> <p>Andrew LeBeau</p>
Juan Ospina	San Diego, CA	2016-06-21	The connector will not improve our living conditions
Karen Helf	San Diego, CA	2016-06-21	I live in Mission Valley and the lack of adequate planning in going to ruin this community. The Civita entrance is already a dangerous "obstacle" on Friars Road. Who ever approved that community without road expansion should be fired.

H-23

Phoebe Lau	San Diego, CA	2016-06-21	<p>This is a big issue to me as it affects our day to day peacefulness and safety crossing the road. I originally wanted the connection before moving in. But now I'd rather spend an extra few mins driving on mission center road than to risk my life crossing via Alta once the parks are built.</p> <p>The slope, curvature, and width of the road is not ideal to be used as a passage/shortcut for not just residents of mission valley and Serra mesa, but also commuters elsewhere who need to get into mission valley to work, especially those who will be working in the retail/commercial businesses along civita Blvd. I cannot imagine how difficult it'll be for anyone to make a left turn, let alone safely walk across, on Via Alta when we're expecting a car passing by every few seconds.</p> <p>Having a school in the near future also makes this a bad idea to draw in more cars when parents are having to deal with long lines of dropping kids off in a single lane road as well as increasing safety concerns for parents walking the kids to school.</p> <p>Civita was advertised to us as a walkable neighborhood, this two lane residential neighborhood is not a solution to an on/off ramp shortcut. Please look for an alternative solution instead of cutting our neighborhood in 3 parts.</p>
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H-24

Name	Location	Date	Comment
Alex Tse	San Diego, CA	2016-06-21	<p>This is a big issue to me as it affects our day to day peacefulness and safety crossing the road. I originally wanted the connection before moving in. But now I'd rather spend an extra few mins driving on mission center road than to risk my life crossing via Alta once the parks are built.</p> <p>The study suggests having the road connection will INCREASE travel time, I don't see how this will benefit anyone.</p> <p>The slope, curvature, and width of the road is not ideal to be used as a passage/shortcut for not just residents of mission valley and Serra mesa, but also commuters elsewhere who need to get into mission valley to work, especially those who will be working in the retail/commercial businesses along civita Blvd. I cannot imagine how difficult it'll be for anyone to make a left turn, let alone safely walk across, on Via Alta when we're expecting a car passing by every few seconds.</p> <p>Having a school in the near future also makes this a bad idea to draw in more cars when parents are having to deal with long lines of dropping kids off in a single lane road as well as increasing safety concerns for parents walking the kids to school.</p> <p>Civita was advertised to us as a walkable neighborhood, this two lane residential neighborhood is not a solution to an on/off ramp shortcut. Please look for an alternative solution instead of cutting our neighborhood in 3 parts.</p>

H-25

Josh Weiselberg	San Diego, CA	2016-06-21	<p>The 805 and 163 are the rapid traffic paths through the region and do not need to be further slowed by more localized traffic ingress and egress. As a member of the Mission Valley Planning Group I led a coalition of Board Members to defeat the establishment of this traffic impediment to our greater region. The road would negatively impact more commuters than it would benefit.</p> <p>Furthermore, the money that Sudberry / Civita has pledged for Community Improvement would be better served in conjunction with the 15 and 163 traffic flow improvements, especially coordinated with any changes to the Qualcomm Stadium site. Josh Weiselberg, MVPG</p>
Erin Bauer	San Diego, CA	2016-06-21	<p>I live, own and pay taxes in the Civita community in San Diego and this would ruin our community's quality of life.</p>
John Noble	San Diego, CA	2016-06-22	<p>Too much traffic congestion.</p>
Carl Obeck	San Diego, CA	2016-06-22	<p>I'm a resident of Civita and since the community is not yet built out (many homes are still slated for construction), it would be best to wait to see final resident traffic patterns before opening an extension.</p>
Cory Murphy	San Diego, CA	2016-06-22	<p>I want this plan to be rejected.</p>
Charles Srock	San Diego, CA	2016-06-23	<p>This cut through solution should have been decided when the original development was planned and approved. Trying to force this through now is ridiculous. Let the rich folks who buy over priced homes in Mission Valley enjoy all the benefits of their gated community, and the traffic realities of being so centrally located. They should not be allowed to cut through existing, mature, neighborhoods.</p>
John Concepcion	San Diego, CA	2016-06-24	<p>I've lived in Serra Mesa 48 years. My parents bought one of the first houses on Kaplan Drive in 1964. In addition to the street connection not meeting the project objectives to improve traffic etc., it would increase traffic, pollution, commute times and numbers of traffic accidents if the amendment is approved. We enjoy a quality of life in this part of San Diego that would disappear if the amendment is ratified.</p>

H-26

Name	Location	Date	Comment
Sandra Stahl	San Diego, CA	2016-06-25	<p>If the Franklin Ridge Road Connection is built it will significantly and negatively impact the safety of children attending Jones Elementary School on Greyling Drive. The reason being that it will not take long for drivers to discover they can circumvent the backup of traffic on Murray Ridge Road by using Greyling. If the Franklin Ridge Road Connection is constructed, it will be a disaster waiting to happen.</p> <p>I am appalled that anyone thought a solution for traffic generated by all the new construction in Mission Valley would be to dump it into our Serra Mesa neighborhood.</p>

H-27

Angela Jin	San Diego, CA	2016-06-26	This will undoubtedly have negative impact on our neighborhood. And the benefit of the proposal is not at all clear or in any way balanced by the negative impact it will have on the residents of Civita!
Gloria Damm	San Diego, CA	2016-06-27	I don't believe this change will benefit Our neighborhood and only create negative impacts!
Leilani Turonis	San Diego, CA	2016-06-27	Traffic is already ridiculous with all of the new developments in MV and now to give more access to people using our neighborhood as a shortcut or on ramp to the freeways is unnecessary. Talking about removing residences to add lanes is unnecessary. Why do we have to sacrifice from our neighborhood for developments that are trying to gentrify and kick us out? So they can have easy access? So they can get where they need to be faster? No. Figure something else out. Until then get on the 8 or 163 and get on the 805.
Karla Borrego	San Diego, CA	2016-06-28	My kids safety
David Gonzalez	San Diego, CA	2016-06-28	As a parent of two baby girls, this connection will increase the risk of an accident in a community which was initially planned a a walk-able community and is contrary to the vision of what civita wants to be.
MAULIN PATEL	San Diego, CA	2016-06-28	I live here and do not want to see my community degrade.
Leslie Strommer	San Diego, CA	2016-06-28	We are a pedestrian friendly community and these roads would create an unsafe environment.
Ernst Rossow	San Diego, CA	2016-06-28	I oppose this connection. Civita was designed to be a walking community and with Mission Center Road there is no need for additional roads.
Lisa Juarez	San Diego, CA	2016-06-28	refusing new highway through mission valley -Civita
Sonia Wright	San Diego, CA	2016-06-28	I oppose this plan. It will have a negative impact on the Civita community and will cause more traffic, noise and pollution in a residential community.
Anthony Atkins	San Diego, CA	2016-06-29	More traffic through this neighborhood would cause the area to be unsafe for my and my neighbors children. This a quiet neighborhood and we would like to keep it this way, this opening increases noise. This also gives people a reason to enter the neighborhood that would not otherwise have a reason to be here possibility increasing crime.
Lisa Keenan	San Diego, CA	2016-06-29	I am signing because I am a homeowner in Serra Mesa and I believe this road would have a negative impact on noise, traffic, and safety of our neighborhoods.
Andrew Michajlenko	San Diego, CA	2016-06-29	Freeway collectors do not belong in San Diego's residential neighborhoods. Save Civita as San Diego's next walkable village.
Min Wang	San Diego, CA	2016-06-30	Please protect our neighborhood. This is built to be a residential and pedestrian community. All these will be destroyed by building the freeway connector.
Adriana Paez	San diego, CA	2016-06-30	I'm opposed to this project which will bring traffic, noise and safety implications to my pedestrian community
Brian Mozaffari	San Diego, CA	2016-07-01	I want to preserve my neighborhood where I jog with my dogs every week.

H-27
cont.

Name	Location	Date	Comment
Susan Mendoza	San Diego, CA	2016-07-02	The connection will not alleviate traffic congestion according to the EIR and will have a negative affect on the Serra Mesa community
Michael Cahill	San Diego, CA	2016-07-02	It would RUIN a quiet neighborhood. There are other options. Don't let the BIG BULLY RUIN the neighborhood. They are trying to railroad this through. DON'T LET THEM DO IT.
Holly Fuller	La Mesa, CA	2016-07-02	I grew up in this hood and friends and family still live there I work in the hood now We don't need more traffic It's used as a pass thru now for people to get to freeway and mission valley There is already mission ctr road they can use!!!! Schools military lots of kids here no more traffic
Karen Parker	San Diego, CA	2016-07-02	Murray Ridge road is already bad and the people who bought houses on Phyliss bought because it was quite and private.
Daniel LePage	San Diego, CA	2016-07-02	I do not want the influx of traffic.
Dennis Valencia	San Diego, CA	2016-07-02	This is an unnecessary divergence of traffic and danger into a quiet community that has been a community model for safety and maintaining property values for decades.
Laurie Park	Mililani, HI	2016-07-03	I grew up in this neighborhood and don't want to see the additional traffic ruin it
Kerry Kreczmer	Carlsbad, CA	2016-07-03	I want to keep Civita as a walkable and pedestrian friendly community.
Shelley Jaime	San Diego, CA	2016-07-03	Freeway connectors do not belong within the walkable community of Civita.
Dusanka Villegas	San Diego, CA	2016-07-03	I live in Serra Mesa and the Murray Ridge Rd connection to the I 805 is already heavy populated and extremely busy.
John Hammond	San Diego, CA	2016-07-03	There should be a better traffic plan than to dump all the traffic into Serra Mesa especially with a limited 805 on ramp.
Patricia OLeary	San Diego, CA	2016-07-03	Serra Mesa has taken a bulk of the burden with schools and roads due to the Mission Valley overdevelopment, and added traffic would hurt the community and bring our property values down.
Linda King	San Diego, CA	2016-07-03	I agree with the listed traffic challenges, and on top of that I believe that there is undisturbed habitat along the rim that has shown Least Bell's Vireo has been seen in this area, however nesting has not been confirmed. I'm curious as to how much effort was put into confirming nesting of this Endangered Species since it may stop development of the area.

H-28

Name	City	State	Postal Code	Country	Signed On
Bryce Niceswanger				United States	6/11/2016
Adam Gardner	San Diego	California	92123	United States	6/11/2016
Larry Wenell	San Diego	California	92108	United States	6/11/2016
Eileen Harrington	San Diego	California	92123	United States	6/11/2016
Ron Yardley	San Diego	California	92108	United States	6/11/2016
Denise Davidson	San Diego	California	92123	United States	6/11/2016
Emalyn Churchwell	Oceanside	California	92058	United States	6/11/2016
Nancy Swirhun	San Diego	California	92123	United States	6/12/2016
Pat Day-Phillips	San Diego	California	92108	United States	6/12/2016
Henry Johnson	San Diego	California	92108	United States	6/12/2016
Julita Johnson	San Diego	California	92108	United States	6/12/2016
Susan Castiglione	San Diego	California	92123	United States	6/12/2016
Michael Hughes-Davies	San Diego	California	92123	United States	6/12/2016
Mooney Sandra	San Diego	California	92123	United States	6/12/2016
Katherine Young	San Diego	California	92130	United States	6/12/2016
Colette Gallagher	San Diego	California	92123	United States	6/12/2016
Peter Billow	San Diego	California	92108	United States	6/12/2016
Vincent Castiglione	San Diego	California	92123	United States	6/12/2016
S Hewey	San Diego	California	92123	United States	6/12/2016
Kameron Manshadi	San Diego	California	92108	United States	6/12/2016
Jeremy Hamm	San Diego	California	92123	United States	6/12/2016
Pam Fleming	San Diego	California	San Diego	United States	6/12/2016
Brittany Barroga	San Diego	California	92123	United States	6/12/2016
Tim Fleming	San Diego	California	92108	United States	6/12/2016
Michael Sullivan	San Diego	California	92108	United States	6/12/2016
Andrea Chertkow	San Diego	California	92108	United States	6/12/2016
Ana Hartman	San Diego	California	92123	United States	6/12/2016
Judy Mayberry	San Diego	California	92123	United States	6/12/2016
David O'Brien	San Diego	California	92123	United States	6/12/2016
Carole Jordan	San Diego	California	92108	United States	6/12/2016
susie white	roma		52	Italy	6/12/2016
Lorraine Hitchen	San Diego	California	92108	United States	6/12/2016
James Warniak	San Diego	California	92108	United States	6/12/2016
J Tichenor	San Diego	California	92108	United States	6/12/2016
Jarret Sa'o	San Diego	California	92123	United States	6/12/2016
Irma Villavicencio	San Diego	California	92108	United States	6/12/2016
Craig Davis	San Diego	California	92123	United States	6/12/2016
Andre Webb	San Diego	California	92108	United States	6/12/2016
Lois Nelson	San Diego	California	92123	United States	6/13/2016
Anita Palmer	San Diego	California	92123	United States	6/13/2016
Gina Villavicencio-Estep	San Diego	California	92123	United States	6/13/2016
Mike Buck	San Diego	California	92108	United States	6/13/2016
Robi Siers	San Diego	California	92123	United States	6/13/2016
Richard Hale	San Diego	California	92108	United States	6/13/2016
Beverly Patch	San Diego	California	92123	United States	6/13/2016
Rosalyn Leingang	San Diego	California	92123	United States	6/13/2016

Chrissa O'Brien	San Diego	California	92123 United States	6/13/2016
Ling Ly	San Diego	California	92108 United States	6/13/2016
joanne friedman herbert friedman	San Diego	California	92108 United States	6/13/2016
Yumi Ly	San Diego	California	92108 United States	6/13/2016
Katherine Tran	San Diego	California	92108 United States	6/13/2016
Darcy Addy	San Diego	California	92123 United States	6/13/2016
Leah O'Brien	Seattle	Washington	98103 United States	6/13/2016
Robert Twomey	Seattle	Washington	98103 United States	6/13/2016
Susan Buell	San Diego	California	92108 United States	6/13/2016
Jennifer Smith	San Diego	California	92108 United States	6/13/2016
Russell Tett	San Diego	California	92108 United States	6/13/2016
Jonathan Perry	San Diego	California	92108 United States	6/13/2016
Nathan Leboffe	San Diego	California	92123 United States	6/13/2016
Princess Alo	San Diego	California	92108 United States	6/13/2016
Bobby Phan	San Diego	California	93126 United States	6/13/2016
Joan Dillenbeck	San Diego	California	92123 United States	6/13/2016
Steve Moore	San Diego	California	92123 United States	6/13/2016
KELLY CHUCKTA	SAN DIEGO	California	92123-382 United States	6/13/2016
Mary Hart	San Diego	California	92123 United States	6/13/2016
Cedric Logan	San Diego	California	92123 United States	6/13/2016
Clarence Moeller	San Diego	California	92123 United States	6/13/2016
Karmyn Garcia	San Diego	California	92123 United States	6/13/2016
Savage Elise	San Diego	California	92123 United States	6/13/2016
Yuliya Stupfel	San Diego	California	92123 United States	6/13/2016
Paul Grandi	San Diego	California	92123 United States	6/13/2016
Kenneth Smith	San Diego	California	92123 United States	6/13/2016
Michael Janke	San Diego	California	92108 United States	6/13/2016
Wendy Westgate	Burbank	California	91505 United States	6/13/2016
Rose Davidson rsdavidson@yahoo.	San Diego	California	92123 United States	6/13/2016
John Chuckta	San Diego	California	92123 United States	6/13/2016
Janice Cimbalo	San Diego	California	92123 United States	6/13/2016
Sonia Hyncik	San Diego	California	92108 United States	6/13/2016
Cindy Canfield	San Diego	California	92123 United States	6/13/2016
Michele Boswell	San Diego	California	92123 United States	6/13/2016
Xavier Novas Forns	San Diego	California	92108 United States	6/13/2016
Rachael Noble	San Diego	California	92123 United States	6/13/2016
Christy MICKEL	San Diego	California	92108 United States	6/13/2016
Virginia Hensley	San Diego	California	92108 United States	6/13/2016
Didier Beauvarlet	San Diego	California	92108 United States	6/13/2016
Victor Phan	San Diego	California	92123 United States	6/13/2016
Truc Hoang	San Diego	California	92123 United States	6/13/2016
Kathy Mcsherry	San Diego	California	92108 United States	6/13/2016
Michael Cristofani	San Diego	California	92111 United States	6/13/2016
Lalenia Cianciolo	San Diego	California	92123 United States	6/13/2016
Matt Kennedy	Berwyn	Pennsylvania	19312 United States	6/13/2016
James Reichert	San Diego	California	92108 United States	6/13/2016
Bradley Hobson	San Diego	California	92108 United States	6/13/2016

H-29
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Jill Reichert	San Diego	California	92108 United States	6/13/2016
Amanda Lettmann	San Diego	California	92108 United States	6/13/2016
Brian Coyne	Santee	California	92071 United States	6/13/2016
Nicole Howard	San Diego	California	92108 United States	6/13/2016
Leana Dillon	San Diego	California	92123 United States	6/13/2016
Judith McEntyre	San Diego	California	92108-262 United States	6/13/2016
Kristofor Carnegie	San Diego	California	92108 United States	6/13/2016
Greg Blasic	San Diego	California	92108 United States	6/13/2016
andrea winter	San Diego	California	92108 United States	6/13/2016
Whitney Niceswanger	San Diego	California	92123 United States	6/13/2016
Theresa Davis	San Diego	California	92133 United States	6/13/2016
Ronni Echevarria	San Diego	California	92123 United States	6/13/2016
Julianna Winter	San Diego	California	92108 United States	6/13/2016
Matthew Gates	San Diego	California	92108 United States	6/13/2016
TRACI Hetherington	San Diego	California	92123 United States	6/13/2016
Dixie Small	San Diego	California	92123 United States	6/13/2016
Dong Han	San Diego	California	92108 United States	6/13/2016
Adrienne Prager	San Diego	California	92123 United States	6/13/2016
Regina Thompson	San Diego	California	92123 United States	6/13/2016
Brian MICKEL	San Diego	California	92108 United States	6/13/2016
Haylie Canfield	San Diego	California	92123 United States	6/13/2016
David Dolnick	San Diego	California	92123 United States	6/14/2016
Jim Antoshak	San Diego	California	92123 United States	6/14/2016
Kathlyn Yap	San Diego	California	92108 United States	6/14/2016
Par Canfield	San Diego	California	92123 United States	6/14/2016
Michael Yap	San Diego	California	92108 United States	6/14/2016
Carl Demas	San Diego	California	92123 United States	6/14/2016
John PRATER	San Diego	California	92123 United States	6/14/2016
Kelley Rogers	San Diego	California	92108 United States	6/14/2016
Bryan Noar	San Diego	California	92108 United States	6/14/2016
Alexis Hanson	San Diego	California	92103 United States	6/14/2016
Brandon Swindell	San Antonio	Texas	78254 United States	6/14/2016
Mike Luck	San Diego	California	92108 United States	6/14/2016
Ghazi Hitti	San Diego	California	92108 United States	6/14/2016
Therese Smith	San Diego	California	92123 United States	6/14/2016
Cassie Winter	San Diego	California	92108 United States	6/14/2016
fernando silva	San Diego	California	92123 United States	6/14/2016
Elaine Matoushek	San Diego	California	92123 United States	6/14/2016
Bill Olson	San Diego	California	92108 United States	6/14/2016
Melissa Spencer	San Diego	California	92108 United States	6/14/2016
LaDawn Allen	San Diego	California	92123 United States	6/14/2016
Jo Benrubi	San Diego	California	92123 United States	6/14/2016
Carrie Hobson	San Diego	California	92108 United States	6/14/2016
Sarah Kinnings	San Diego	California	92108 United States	6/14/2016
Joshua Blickman	San Diego	California	92108 United States	6/14/2016
Joyce Tang Blickman	San Diego	California	92108 United States	6/14/2016
Don Shelton	San Diego	California	92108 United States	6/14/2016

H-29
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Timothy Schu	San Diego	California	92108 United States	6/14/2016
Brooke Hubbard	San Diego	California	92108 United States	6/14/2016
Natasha Shelton	San Diego	California	92108 United States	6/14/2016
Bhoomika Patel	San Diego	California	92108 United States	6/14/2016
Donna Schu	San Diego	California	92108 United States	6/14/2016
Michael Hubbard	Carlsbad	California	92018 United States	6/14/2016
Mark Schu	San Diego	California	92108 United States	6/14/2016
Billy Lambon	San Diego	California	92108 United States	6/14/2016
Rebecca Callaway	San Diego	California	92108 United States	6/14/2016
Lisa Graham	San Diego	California	92123 United States	6/14/2016
April Johnson	San Diego	California	92108 United States	6/14/2016
Darnell Henderson	San Diego	California	92108 United States	6/14/2016
Kimberley Hobson	Vista	California	92081 United States	6/14/2016
Andrea Eaton	San Diego	California	92123 United States	6/14/2016
Richard Grinsell	San Diego	California	92123 United States	6/14/2016
Laurel Daly	San Diego	California	92123 United States	6/14/2016
Mildred Carney	San Diego	California	92123 United States	6/14/2016
carolyn gattis	San Diego	California	92108 United States	6/14/2016
James Carney	San Diego	California	92123 United States	6/14/2016
Lourdes Morales	San Diego	California	92108 United States	6/14/2016
Daniel Yap	Camarillo	California	93010 United States	6/15/2016
Will Leingang	San Diego	California	92123 United States	6/15/2016
Eric Cox	San Diego	California	92108 United States	6/15/2016
Anne Khong	San Diego	California	92108 United States	6/15/2016
Elizabeth Rush	San Diego	California	92108 United States	6/15/2016
Kyle Hinsz	San Diego	California	92123 United States	6/15/2016
Ellen Barker	San Diego	California	92123 United States	6/15/2016
Lee Rush	San Diego	California	92108 United States	6/15/2016
Carole Porter	San Diego	California	92123-380 United States	6/15/2016
Tristan Weisheit	San Diego	California	92123 United States	6/16/2016
Kathryn Silva	San Diego	California	92123 United States	6/16/2016
Carlo Perez	San Diego	California	92108 United States	6/16/2016
Markus Dao	San Diego	California	92108 United States	6/16/2016
Rebecca Kiperts	San Diego	California	92123 United States	6/16/2016
eligio rollo	San Diego	California	92108 United States	6/16/2016
Evan Franz	San Diego	California	92108 United States	6/16/2016
Halle Dichoza	San Diego	California	92123 United States	6/16/2016
Loan Dao	San Diego	California	92131 United States	6/16/2016
Deborah Bossmeyer	San Diego	California	92108 United States	6/17/2016
Gabriela Surpi	San Diego	California	92123 United States	6/17/2016
Joshua Jamison	San Diego	California	92108 United States	6/17/2016
Brittni Dorn	San Diego	California	92108 United States	6/17/2016
Nick Dorn	San Diego	California	92108 United States	6/17/2016
Hunter Johnson	San Diego	California	92108 United States	6/17/2016
Darrin Fournier	San Diego	California	92123 United States	6/17/2016
Lauren Feiner	San Diego	California	92108 United States	6/17/2016
Adam Bunn	San Diego	California	92108 United States	6/17/2016

Ryan Braidwood	San Diego	California	92108 United States	6/17/2016
Anne Law	San Diego	California	92108 United States	6/17/2016
Samuel Cassidy	San Diego	California	92108 United States	6/17/2016
Stephen Vonderach	San Diego	California	92108 United States	6/18/2016
Derek Abel	San Diego	California	92108 United States	6/18/2016
Laura Johansen	San Diego	California	92108 United States	6/18/2016
Thomas Leech	San Diego	California	92123 United States	6/18/2016
William Graham	San Diego	California	92123 United States	6/18/2016
Cinda Phillips	San Diego	California	92123 United States	6/18/2016
Robert Ruzich	San Diego	California	92123 United States	6/18/2016
Samantha Ruzich	San Diego	California	92123 United States	6/18/2016
Mary Cline	San Diego	California	92123-388 United States	6/18/2016
Vincent Di Nino	San Diego	California	92108 United States	6/18/2016
Leslie Johnson Leech Johnson Leec	San Diego	California	92123 United States	6/19/2016
Amy Antoshak	San Diego	California	92123 United States	6/19/2016
Tami Irvine	San Diego	California	92123 United States	6/19/2016
Perry Mack	San Diego	California	92123 United States	6/19/2016
Samir Mukherjee	San Diego	California	92108 United States	6/19/2016
Pamela Morales	San Diego	California	92123 United States	6/19/2016
Peter Morales	San Diego	California	92123 United States	6/19/2016
William Watson	San Diego	California	92123 United States	6/19/2016
Lesley Marples	San Diego	California	92123 United States	6/19/2016
Mark Tudor	San Diego	California	92123 United States	6/19/2016
Matt Shirley	San Diego	California	92123 United States	6/19/2016
Allen Wu	San Diego	California	92108 United States	6/19/2016
Linda Johansen	Wheaton	Illinois	60189 United States	6/19/2016
Thao Dao	Escondido	California	92029 United States	6/19/2016
Audrey Tom	San Diego	California	92123 United States	6/20/2016
Paul Martinez	San Diego	California	92111 United States	6/20/2016
Ann Finster	Phoenix	Arizona	85022 United States	6/20/2016
Ruby Contreras	Vista	California	92081 United States	6/20/2016
Marco Sawrey	San Diego	California	92108 United States	6/20/2016
Raquel Beam	San Diego	California	92123 United States	6/20/2016
Richard Nerad	San Diego	California	92108 United States	6/20/2016
Kathy Collier	San Diego	California	92123 United States	6/20/2016
Sanket Patel	San Diego	California	92108 United States	6/21/2016
Dennis Tornabene	San Diego	California	92123 United States	6/21/2016
Andrew LeBeau	San Diego	California	92108 United States	6/21/2016
Juan Ospina	San Diego	California	92108 United States	6/21/2016
Karen Helf	San Diego	California	92108 United States	6/21/2016
Phoebe Lau	San Diego	California	92108 United States	6/21/2016
Alex Tse	San Diego	California	92108 United States	6/21/2016
Josh Weiselberg	San Diego	California	92108 United States	6/21/2016
Jeremy Reed	San Diego	California	92108 United States	6/21/2016
James Sperbeck	San Diego	California	92123 United States	6/21/2016
Rayene SPERBECK	San Diego	California	92123 United States	6/21/2016
Erin Bauer	San Diego	California	92109 United States	6/21/2016

Cynthia Moore	San Diego	California	92123 United States	6/21/2016
Shelly Marion	San Diego	California	92123 United States	6/21/2016
Michelle Bunn	San Diego	California	92108 United States	6/22/2016
John Noble	San Diego	California	92123 United States	6/22/2016
Akshara Naik	San Diego	California	92108 United States	6/22/2016
Kimberly Lieu	San Diego	California	92123 United States	6/22/2016
Carl Obeck	San Diego	California	92101 United States	6/22/2016
William Brindle	San Diego	California	92123 United States	6/22/2016
Cory Murphy	San Diego	California	92108 United States	6/22/2016
Charles Srock	San Diego	California	92123 United States	6/23/2016
Elif Aydinlar	San Diego	California	92108 United States	6/23/2016
chris hewitt	San Diego	California	92108 United States	6/23/2016
Collier Collier	San Diego	California	92123 United States	6/24/2016
John Concepcion	San Diego	California	92123 United States	6/24/2016
Sandra Stahl	San Diego	California	92123 United States	6/25/2016
Angela Jin	San Diego	California	92108 United States	6/26/2016
Andrew White	San Diego	California	92123 United States	6/26/2016
Veronica Santana	San Diego	California	92123 United States	6/26/2016
Marilyn Atwood	San Diego	California	92123 United States	6/26/2016
Jonathan Choi	San Diego	California	92123 United States	6/27/2016
Gloria Damm	San Diego	California	92123 United States	6/27/2016
Leilani Turonis	San Diego	California	92123 United States	6/27/2016
Karla Borrego	San Diego	California	92108 United States	6/28/2016
babak rahimi	San Diego	California	92108 United States	6/28/2016
Jennifer Boles	San Diego	California	92108 United States	6/28/2016
Rachel Riggs	San Diego	California	92108 United States	6/28/2016
David Gonzalez	San Diego	California	92108 United States	6/28/2016
Jacqueline Villalta	San Diego	California	92108 United States	6/28/2016
MAULIN PATEL	San Diego	California	92108 United States	6/28/2016
Leslie Strommer	San Diego	California	92108 United States	6/28/2016
Dani Nazemian	San Diego	California	92108 United States	6/28/2016
Cenie Ho	San Diego	California	92108 United States	6/28/2016
Ernst Rossow	San Diego	California	92108 United States	6/28/2016
Lisa Juarez	San Diego	California	92110 United States	6/28/2016
Kyle Rector	San Diego	California	92108 United States	6/28/2016
David Brown	San Diego	California	92108 United States	6/28/2016
Sonia Wright	San Diego	California	92108 United States	6/28/2016
Monica Atkins	San Diego	California	92123 United States	6/29/2016
Anthony Atkins	San Diego	California	92123 United States	6/29/2016
Lisa Keenan	San Diego	California	92123 United States	6/29/2016
Qihui Jin	San Diego	California	92108 United States	6/29/2016
Andrew Michajlenko	San Diego	California	92108 United States	6/29/2016
Devin Mason	San Diego	California	92110 United States	6/29/2016
Mark King	San Diego	California	92123 United States	6/29/2016
Ingrid Pyper	San Diego	California	92123 United States	6/30/2016
Min Wang	San Diego	California	92108 United States	6/30/2016
Chad Hagedorn	San Diego	California	92108 United States	6/30/2016

Marilou Bueno	San Diego	California	92108 United States	6/30/2016
Adriana Paez	San diego	California	Aperture ci United States	6/30/2016
D P	San Diego	California	92108 United States	6/30/2016
Robert Damm	San Diego	California	92123 United States	6/30/2016
Cicely Kraus	San Diego	California	92108 United States	6/30/2016
Scott Kraus	San Diego	California	92108 United States	6/30/2016
Brian Mozaffari	San Diego	California	92108 United States	7/1/2016
Cindy Jaime	San Diego	California	92108 United States	7/1/2016
Susan Mendoza	San Diego	California	92123 United States	7/2/2016
Diane LaTulippe	Temecula	California	92591 United States	7/2/2016
Laura Hurt	San Diego	California	92123 United States	7/2/2016
Amy Wert	San Diego	California	92123 United States	7/2/2016
Jonathan Byrne	San Diego, CA	California	92123 United States	7/2/2016
Stephanie Baldwin	San Diego	California	92123 United States	7/2/2016
Michael Cahill	San Diego	California	92123 United States	7/2/2016
Angelic Riley	San Diego	California	92123 United States	7/2/2016
Anne Pilgrim	Imperial Beach	California	92123 United States	7/2/2016
Arne Ratermanis	San Diego	California	92105 United States	7/2/2016
Cheryl LaMell	San Diego	California	92123 United States	7/2/2016
Holly Fuller	La Mesa	California	91942 United States	7/2/2016
Karen Parker	San Diego	California	92123 United States	7/2/2016
Firooz Rasouli	San Diego	California	92108 United States	7/2/2016
Daniel LePage	San Diego	California	92123 United States	7/2/2016
Traci Mitchell	San Diego	California	92123 United States	7/2/2016
Dennis Valencia	San Diego	California	92123 United States	7/2/2016
Laurie Park	Mililani	Hawaii	96789 United States	7/3/2016
Kerry Kreczmer	Carlsbad	California	92018 United States	7/3/2016
Jacob Smart	San Diego	California	92123 United States	7/3/2016
Richard Pilgrim	Imperial Beach	California	91932 United States	7/3/2016
Bill Barlow	San Diego	California	92123 United States	7/3/2016
Shelley Jaime	San Diego	California	92108-262 United States	7/3/2016
Dusanka Villegas	San Diego	California	92123 United States	7/3/2016
John Hammond	San Diego	California	92123 United States	7/3/2016
Patricia OLeary	San Diego	California	92123 United States	7/3/2016
Debra Tomanini	San Diego	California	92107 United States	7/3/2016
Joseph Tichman	San Diego	California	92108 United States	7/3/2016
Linda King	San Diego	California	92123 United States	7/3/2016
Vikki Coughlin	San Diego	California	92108 United States	7/4/2016
CAROL ROLAND	San Diego	California	92123 United States	7/4/2016
Terry Appleby	San Diego	California	92123 United States	7/4/2016
Michele Valencia	San Diego	California	92123 United States	7/4/2016
Patricia Warner	San Diego	California	92123 United States	7/4/2016
Howard Myers	San Diego	California	92123 United States	7/5/2016
Kelly Michajlenko	San Diego	California	92108 United States	7/5/2016
Alan Nations	San Diego	California	92123 United States	7/5/2016
Sharon Pearce	San Diego	California	92123 United States	7/5/2016
Carly Bell	San Diego	California	92123 United States	7/5/2016

Young Hoon Kang	San Diego	California	92108 United States	7/5/2016
William Knapp	San Diego	California	92108 United States	7/5/2016
Niki Tran	San Diego	California	92108 United States	7/5/2016
Alana Ziman	San Diego	California	92108 United States	7/6/2016
Sacha Stevenson	San Diego	California	92108 United States	7/6/2016
Jared Ziman	San Diego	California	92108 United States	7/6/2016
Matthew Pyle	San Diego	California	92123 United States	7/7/2016
Anna Pyle	San Diego	California	92123 United States	7/7/2016
Ahron Black	San Diego	California	92123 United States	7/7/2016
Cynthia fuller	San Diego	California	92123 United States	7/9/2016
Kathy Klingenberg	San Diego	California	92123 United States	7/10/2016
Robert Carlson	San Diego	California	92123 United States	7/14/2016
Jason LaMell	San Diego	California	92123 United States	7/14/2016
diane gage	San Diego	California	92123 United States	7/15/2016
Don Riggs	San Diego	California	92123 United States	7/19/2016
Charles A. West	San Diego	California	92123 United States	7/19/2016
Andrew Heier	San Diego	California	92108 United States	7/21/2016
Michelle Mason	San Diego	California	92123 United States	7/22/2016
Eliana Uretsky	San Diego	California	92123 United States	7/27/2016
Maria Silva	San Diego	California	92108 United States	8/2/2016
Peggy Kostiuik	San Diego	California	92123 United States	8/4/2016
Russell Orrell	San Diego	California	92123 United States	8/8/2016
Natalie Luong	Westminster	California	92683 United States	8/14/2016
james troy	San Diego	California	92108 United States	8/15/2016
Jacqueline Wasiluk	San Diego	California	92123 United States	8/30/2016
Deeann Coffey	San Diego	California	92123 United States	9/1/2016
Diego Fernandez	San Diego	California	92108 United States	9/20/2016
Katrina Butler	San Diego	California	92123 United States	10/12/2016
Denise Valencia	San Diego	California	92123 United States	1/13/2017
Mike Thomas	San Diego	California	92108 United States	4/2/2017
Edward Lopatin	San Diego	California	92108 United States	4/19/2017
Eduardo Brener	Palm Springs	California	92262 United States	4/19/2017
Julie Kawakami	San Diego	California	92108 United States	4/19/2017
Kenneth Stowell	San Diego	California	92108 United States	4/21/2017
Viviane Feilhaber	San Diego	California	92108 United States	4/25/2017
Natasha Mayat	San Diego	California	92108 United States	4/26/2017
Ryan Harvey	San Diego	California	92108 United States	4/26/2017
Simone Fuston	San Diego	California	92108 United States	4/26/2017
DARRELL VEGA	San Diego	California	92108 United States	4/28/2017
Evan Myers	San Diego	California	92108 United States	4/28/2017
Mary Oberstein	La Jolla	California	92037 United States	5/1/2017
John Carter	San Diego	California	92108 United States	5/5/2017
Isabella Saucedo	San Diego	California	92108 United States	5/5/2017

We the Undersigned are in opposition of the Franklin Ridge Road connection and the initiative to amend the Serra Mesa community plan to include it. We reject the Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048, see petition.

Name (Sign)

Name (Print)

Address or email

Margarette Clarke MARGARETTE CLARKE
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Jason R Barr Jason R. Barr - 8330 Phyllis Pl
Apt 208
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Ruby W Plouffe RUBY W PLOUFFE
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Carol Ann Ferrell 8340 Phyllis Pl 213 92123

Janice Ballen 8330 Phyllis Pl #209 SD 92123

Normie Terrell 8350 Phyllis Pl #117 SD 92123

Edna M. Shekar 8350 Phyllis Pl. 92123

Mary Chie 8350 PHYLLIS PL #122 92123

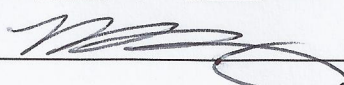
Pat Mc 8370 PHYLLIS PL 92123

Janet Zdvork 8370 Phyllis Pl 92123

Ana Lopez 8370 Phyllis Pl. 92123

I, the circulator of the Petition Page do hereby attest and under the penalties of perjury that each person whose signature appears in this page signed in person in my presence; that I know each signer personally or that each signer satisfactorily identified himself/herself to me; and that all the signatures on this page were obtained no earlier than six months prior to filling said petition.

Dated San Diego California 26th day of June, 2016

Signature of Circulator  Printed name Bryce Niceswanger

Letter H: Stop the Road

H-1: The commenter states general opposition to the project and that detailed comments are attached within the letter (responses to these comments are provided below). The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

H-2: The commenter provides general reasons for opposition to the proposed project and generally states that the DEIR is inadequate, but does not provide any explanation, information, specific examples, or other support for the comment. Please see the response to comment F-2.

The alternatives considered present a reasonable range of alternatives and considered both alternatives carried forward for a qualitative comparison to the proposed project's impacts and also alternatives that were considered but rejected because they did not reduce a significant environmental impact, were not feasible, or did not meet the basic project objectives.

The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

H-3: This comment states that the City should deny the proposed project and revise the Mission Valley Community Plan (MVCP) to exclude the proposed roadway connection. Please refer to Section 9.4.1.2 of the DEIR for reasons as to why the No Build/Remove from Mission Valley Community Plan Alternative was rejected for detailed analysis. The comment also states that the proposed project has significant and unavoidable impacts associated with transportation/circulation, air quality, and noise (operational) in both communities; however, this is not entirely correct. As detailed in the Executive Summary and throughout Chapter 5, *Environmental Analysis*, of the DEIR, the proposed project would result in significant and unavoidable direct impacts after mitigation related to transportation/circulation (roadway network capacity, planned transportation systems, and traffic hazards). The proposed project would result in less than significant impacts related to operational noise and air quality. No revisions to the FEIR are warranted as a result of this comment.

H-4: This comment restates the first bulleted objective from the DEIR (see Section 3.1) and incorrectly states the significant impacts of the proposed project (see response to comment H-3 above). The proposed project would not substantially conflict with the goals and policies of the MVCP. Furthermore, the project would implement a specific goal of the MVCP as noted in response to comment G-4. This comment also states that the proposed project is less compliant with the General Plan and community plans than the No Project Alternative. The proposed project's conformance with the General Plan and Serra Mesa Community Plan are detailed in Section 5.1, *Land Use*. As detailed within Section 9.5.3 of the DEIR, the No Project Alternative would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as it would not decrease VMT within the study area or the region. Therefore, it would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project. No revisions to the FEIR are warranted as a result of this comment.

H-5: This comment restates an objective from the previously circulated DEIR (July 2016) that is not included within the current iteration of the DEIR. It also cites information from a traffic appendix that is not in the recirculated DEIR (see updated Appendix C to the DEIR). The commenter cites several tables from the outdated version of the traffic appendix. Please see Section 5.2, *Transportation and Circulation*, of the DEIR and the updated Appendix C for the most recent

information regarding the traffic impact analysis. Although the comment expresses that the project does not meet the project objective highlighted by this comment, that objective is no longer within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

H-6: This comment restates the third bulleted objective from the DEIR (see Section 3.1) and does not agree that the project meets the stated objective. The comment also excerpts Appendix C, although it is not known if the commenter is referencing the most recent version of Appendix C circulated with the DEIR. Section 5.2, *Transportation and Circulation*, of the DEIR, analyzes project conditions related to the freeway ramps. Within the Long-Term Scenario (Year 2035), a significant impact was identified at the I-805 SB on-ramp at Murray Ridge Road (Impact TRAF-18) and mitigation was identified that would reduce the impact to less than significant. The project would improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding area. For example, there is no direct route to the I-805 from the Civita site. This is demonstrated by the Vehicle Miles Traveled (VMT) analysis, included within Appendix H, which shows that VMT would be reduced by implementation of the proposed project. Therefore, the project would meet this objective. No revisions to the FEIR are warranted as a result of this comment.

H-7: This comment restates an objective from the previously circulated DEIR (July 2016) that is not included within the current iteration of the DEIR. The objective was revised to state: "Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts." The comment states that the DEIR does not support the conclusion for safe travel conditions, that cyclists would not be protected, that the proposed roadway would be too busy for pedestrians and cyclists, and references policies from community plans. The DEIR adequately details the issues relating to pedestrian, cyclist, and alternative transportation users' safety. Please refer to Section 5.2.8 of the DEIR. The Class II bike lane is a dedicated bike lane that would provide connectivity from Phyllis Place southward to Civita and vice versa. The conceptual roadway design complies with the City's Street Design Manual (2002) and therefore the design would provide for the safety of all users. The commenter references a policy related to the Mission Village Shopping Center that is not applicable to the proposed project. Concerning the policy from the MVCP, the roadway has been conceptually designed to balance the safety of all users, including motorists, pedestrians, and cyclists, to the extent feasible. Therefore, the project would meet this objective. No revisions to the FEIR are warranted as a result of this comment.

H-8: This comment restates the fourth bulleted objective from the DEIR (see Section 3.1) and does not agree that the project meets the stated objective. This comment also states an excerpt from a previous version of Appendix C. Please refer to Section 7.4 of the DEIR, which states that the proposed project would provide an additional ingress and egress roadway for the surrounding area, and provide additional emergency access for emergency responders to the area. It is acknowledged that Kaplan Drive currently provides emergency access, as clarified in the FEIR. However, it does not provide direct access from major roadways, such as I-805 or Murray Ridge Road, as the proposed roadway would. Please also refer to Sections 7.7.1 and 7.7.2, which state that additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times for fire-rescue and police responders. Therefore, the project would meet this objective.

H-9: This comment restates an objective from the previously circulated DEIR (July 2016) that is not included within the current iteration of the DEIR. The project's conformance with the General Plan and other applicable City regulations and policies is detailed within Section 5.1, *Land Use*. The comment generally states the proposed project would conflict with the General Plan and restates

mitigation measures from the previously circulated DEIR (July 2016) as reasons as to why it would conflict. Please refer to Section 5.2, *Transportation and Circulation*, for the most recent iteration of the mitigation measures. Several mitigation measures (see, for example, MM-TRAF-2) stated therein would not be implemented, as they would require the removal of bike lanes or otherwise conflict with existing policies. Therefore, the mitigation identified for the proposed project would not conflict with the General Plan. No revisions to the FEIR are warranted as a result of this comment.

H-10: The comment is a general statement that the EIR is not in compliance with CEQA and determined there would be significant impacts related to traffic, noise, and air pollution. Please see the responses to comments H-2 through H-9. In addition, as noted in the response to comment H-3, only impacts related to traffic would be significant and unavoidable. Impacts related to noise (after mitigation for construction noise) and air quality would be less than significant.

H-11: This comment restates a previous comment that the MVCP should be revised to remove the road connection. Please see the response to comment H-3.

H-12: These comments state opposition to the proposed project but do not address the adequacy of the DEIR.

H-13: This comment indicates the PEIR is not in compliance with CEQA but does not provide any evidence or detail requiring a response. Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-14: Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-15: This comment states that the project would result in negative impacts on several roadways but does not raise a substantive issue with the analysis contained within the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, within the DEIR for the results of the traffic analysis as it pertains to these roadways. No revisions to the FEIR are warranted as a result of this comment.

H-16: This comment states that the project would result in impacts on residential roadways but does not raise a substantive issue with the analysis contained within the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, within the DEIR for the results of the traffic analysis as it pertains to these roadways. This comment also generally raises issues concerning land use compatibility. Please refer to Section 5.1, *Land Use*, within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

H-17: Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-18: This comment generally states that there are existing significant traffic delays along Mission Center Road but does not raise a substantive issue with the analysis contained within the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, within the DEIR for the results of the traffic analysis as it pertains to roadways. Please note that the proposed project would improve level of service along Mission Center Road (see Tables 5.2-10, 5.2-11, 5.2-16, and 5.2-17). No revisions to the FEIR are warranted as a result of this comment.

H-19: Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-20: This comment generally states that the roadway would increase traffic and noise, but does not raise a substantive issue with the analysis contained within the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, and Section 5.4, *Noise*, within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

H-21: The comment alleges that the EIR is flawed and underestimates impacts on safety and from additional traffic. The comment also notes there is existing emergency access via Kaplan Drive. Please see the responses to comments H-2 and H-8. No revisions to the FEIR are warranted as a result of this comment.

H-22: Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-23: This comment generally raises concerns regarding the design of the roadway and concern for pedestrian safety. The conceptual roadway design complies with the City's *Street Design Manual* (2002) and therefore the design would provide for the safety of all users. Please also see the response to comments F-4 and F-5.

H-24: The commenter alleges the road connection will increase travel time. This is not a completely accurate statement. Please see Section 5.2, *Transportation and Circulation*, of the DEIR. The project would increase delays along some roadways and intersections and improve them at others. Overall, there would be a reduction in VMT, reducing the total amount of miles vehicles would be traveling, both locally and regionally. Please see the response to comments F-4, F-5, and H-23. No revisions to the FEIR are warranted as a result of this comment.

H-25: Please see the response to comment H-2. These comments state opposition of the proposed project but do not address the adequacy of the DEIR.

H-26: This comment states that the safety of children will be affected by the road connection because drivers will circumvent traffic on Murray Ridge Road by using Greyling Drive. This comment does not specifically raise issues concerning the adequacy of the DEIR. Safety related issues such as those raised by the commenter can be addressed at a traffic operations level at a future time, if deemed necessary. Please also see the response to comment G-70.

H-27: Please see the response to comment H-2. These comments state opposition of the proposed project with general statements about traffic, safety, and pedestrian considerations but do not address the adequacy of the DEIR. No further response is warranted.

H-28: This comment states that there is undisturbed habitat along the rim that has shown least Bell's vireo within this area. Although it is not known specifically which area the commenter is referring to, there is no suitable habitat within the vicinity of the project site for this species. Please refer to Section 5.5, *Biological Resources*, of the DEIR, which analyzes impacts to biological resources and sensitive species. No revisions to the FEIR are warranted as a result of this comment.

H-29: There are no specific comments, but a list of names is provided. This comment is acknowledged.

From: Haskell, Hilary A <HHaskell@semprautilities.com>
Sent: Tuesday, May 30, 2017 7:58 AM
To: PLN_PlanningCEQA
Cc: Olivo-Gomez, Edalia; Garcia, Rosa M.
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
Attachments: Serra Mesa Community Plan Amendment Roadway Connection Comment Letter.pdf

Ms. Morrison,

Please see attached for SDG&E's comment letter in response to the Recirculated Draft Environmental Impact Report for the Serra Mesa Community Plan Amendment Roadway Connection Project (Project No. 265605).

Thanks,

Hilary Haskell
Environmental Specialist
San Diego Gas & Electric
Email: hhaskell@semprautilities.com
Office: 858.654.1239
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May 30, 2017

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, Suite 1200
East Tower, M.S. 413
San Diego, CA 92101
Via email: planningCEQA@san-diego.gov

RE: Comments on the Recirculated Draft Environmental Impact Report (EIR) for the Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605/ SCH No. 2012011048

Dear Ms. Morrison:

I-2 San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the above-referenced Recirculated Draft EIR per the Notice of Availability for this document that was issued on March 29, 2017. SDG&E is a utility regulated by the California Public Utilities Commission (CPUC) that provides electric and gas services to customers throughout San Diego, Orange, and Imperial counties. The CPUC mandates that SDG&E maintain its utility infrastructure. SDG&E wants to ensure that the Final EIR adequately addresses the public utility implications of the Serra Mesa Community Plan Amendment Roadway Connection Project (Proposed Project).

I-3 In Section 2.1.1, Project Location, the Recirculated Draft EIR indicates that the project site is within an existing SDG&E easement, containing an energy transmission line (four transmission poles) that run east-west at the northern portion of the project site, adjacent to Phyllis Place. In addition, Section 3.3.1.4, Utilities, indicates that, as stated in the Public Utilities section of the Quarry Falls PEIR, "An existing 20-inch high-pressure gas transmission main crosses the northern portion of the project site, within the Vesting Tentative Map area but outside the Quarry Falls Specific Plan boundary, just south of Phyllis Place. This line runs below the SDG&E transmission power lines." Therefore, this gas transmission main runs below the project site, and would need to be raised within the easement to achieve a preferred depth of 3 feet from finished elevation, and the existing pipeline would need to be removed from service after the new portion has been raised. As indicated in the discussion, the Quarry Falls developer has coordinated with SDG&E on this approach during preparation of the Quarry Falls PEIR, and has preliminarily been accepted by SDG&E.

I-4 SDG&E would like to request clarification from the City with regards to the Quarry Falls developer's previous coordination regarding this matter and what the preliminarily accepted approach entails (i.e., how was the determination made that the pipeline would need to be raised) in the Final EIR. Improvement plans for the line will need to be submitted to SDG&E for review and approval.

I-5 Section 3.3.1.4 also states that it is not anticipated that the electric transmission lines (four transmission poles) will be affected by project activities and that further coordination would occur with SDG&E prior to final design with regards to these lines. SDG&E would like to ensure that the Final EIR adequately addresses any transmission line relocations that could be necessary as a result of the Proposed Project per CPUC General Order (GO) 131-D requirements. Please refer to the attached "Guidelines for Private Developer and Agency Initiated Utility Projects that Require CEQA Environmental Documents" for more information regarding how any transmission line relocations must be addressed in the final environmental document.

- I-6 | Any changes in grade or surfacing to access roads and terrain in support of the Proposed Project shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities and access roads. Access roads and project grading proposed within the Proposed Project area must comply with SDG&E Guidelines for encroachment into rights of way. Additionally, grading within SDG&E rights of way require a "permission to grade letter" to ensure the Proposed Project is reviewed by SDG&E and ensure continued compliance with state and federally mandated access standards.
- I-7 | Project grades shall be coordinated to assure clearances as required by CPUC General Order 95. Any improvements above or below ground and/or adjacent to SDG&E rights of way requires compliance with CAL OSHA and/ or the rules for Overhead Electric Line Construction, General Order No. 95 and Underground Electric Line Construction General Order No. 128 during the construction and maintenance of those facilities. Grading plans and site development plans associated with subsequent projects (and geotechnical reports, if applicable), signed and dated, for SDG&E's review, must be submitted.
- I-8 | Please note that any temporary or permanent relocation of facilities, placement of facilities, or temporary outages shall be completed at the cost of the Applicant.
- I-9 | SDG&E thanks you for this opportunity to comment on the Recirculated Draft EIR for the Serra Mesa Community Plan Amendment Roadway Connection. If you have any questions, feel free to contact me at 858-654-1239 or at hhaskell@semprautilities.com.

Sincerely,



Hilary Haskell
Environmental Specialist
San Diego Gas & Electric Company

cc:

Edalia Olivo-Gomez, Team Lead Land Planning, SDG&E
Rosa Garcia, Technical Supervisor (Gas) San Diego Region, SDG&E

Guidelines for Private Developer and Agency Initiated Utility Projects that Require CEQA Environmental Documents

General

These guidelines are provided to assist developers and local agencies in preparing discussions of electric utility work in California Environmental Quality Act (CEQA) environmental documents (Environmental Impact Report, Mitigated Negative Declaration, Negative Declaration, or Certified Regulatory Programs) addressing the “whole of the action” for their projects. Adequately describing and addressing all project elements and impacts associated to SDG&E facilities may be of great assistance in developing an accurate and adequate CEQA document, and in expediting SDG&E’s regulatory permitting process through the California Public Utilities Commission (CPUC) of the State of California.

SDG&E recommends including an accurate description and impact analysis of activities associated with the electric utility work on its facilities in CEQA documents prepared by developers or agencies. Including this discussion can support SDG&E’s claim of exemption from the permitting requirements of the CPUC, General Order 131-D (GO 131-D), as discussed in more detail below.

General Order 131-D states that “...no electric public utility.... shall begin construction...modification...alteration...or addition to an existing electric transmission/power/distribution line...without first complying with the provisions of this General Order.” The General Order defines “transmission lines” as operating at or above 200 kilovolts (kV), “power lines” as operating between 50 and 200 kV, and “distribution lines” as operating below 50 kV. Construction of new transmission lines requires the issuance of a Certificate of Public Convenience and Necessity (CPCN) from the CPUC, while construction of new power lines requires the issuance of a Permit to Construct (PTC). However, the CPUC has identified certain activities which may qualify for an exemption (expedited approval via what is known as an Advice Letter to the CPUC) to the General Order’s PTC, which otherwise may take upwards of 18-24 months for SDG&E to obtain. The activities which are exempt from PTC requirements include, in relevant part, “the minor relocation of existing power line facilities up to 2,000 feet in length” and “power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document ... finds no significant unavoidable environmental impacts caused by the proposed line or substation.” General Order 131-D Sections III.B.1.c and III.B.1.f, respectively.

If the developer or local agency prepares a CEQA document that adequately describes the electric utility work and addresses the environmental impacts as a result of electric utility work on the electrical facility in such a way that those impacts can be separately identified, SDG&E may be able to rely on this document to qualify for the exemption under GO131-D. SDG&E engineering and environmental staff is available for early coordination and provides the following guidelines to facilitate the timely permitting and construction of developer and agency projects that include electric utility work on SDG&E facilities.

These guidelines are not intended to provide legal advice or counsel to developers or agencies regarding compliance with CEQA. Developers and agencies should consult with their lead agency and/or own counsel for advice on compliance with CEQA. The SDG&E Environmental Project Permitting Team is available to answer any questions and to coordinate early on in order to provide the developer or agency with a project description so that they may complete their CEQA analysis of the proposed electric utility work.

Guidelines

Project Description

The overall description for the larger project should discuss the proposed electric utility work as a part of the developer's or agency's larger project.

It is imperative that a *separate* description of the proposed electric utility work is provided in the CEQA document. This description should include the following:

- An exhibit that shows the existing location of electric facilities.
- The need for the electric facility relocation.
- The length (transmission line) or size (substation) and voltage of the electric facility to be removed or relocated.*
- The number, type, and size of equipment that will be installed.*
- The location of temporary and permanent access roads required for initial construction and long-term maintenance.*
- Identification and description of any temporary areas required for the electric utility work, such as work area around structures, pulling and tensioning sites, material staging areas and temporary access roads.*
- A separate exhibit that clearly shows the preferred transmission line routing or the preferred location of the substation enclosure with associated pads and equipment.

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- A diagram of a typical transmission structure or a site layout plan for the substation.*
- A discussion of any alternative routes or locations for the electric utility work on the transmission line or substation, and an analysis of why those alternative routes or locations were not selected over the preferred transmission routing or the preferred substation location. A “no project” alternative should also be included to discuss how the larger project would be implemented without the electric utility work.*
- The types and numbers of construction equipment, and number of personnel that will be required to remove or relocate the electric facility.*
- The anticipated construction schedule including hours per day, daily start and stop times, and total duration for the electric utility work on the electric facility.*

Note: Items above marked with an asterisk* denote information that can be provided by SDG&E to the developer or agency.

Project Setting

The existing environmental conditions, natural or man-made, within the area of the proposed electric utility work should be thoroughly described in the developer’s or agency’s environmental document. The location of existing and proposed electric facilities should be indicated on a map or diagram showing existing environmental features (habitat, wetlands, cultural resources, etc.) in the project area, including any off-site work needed to accommodate the electric utility work.

Impacts

The potential environmental impacts of the proposed electric utility work should be fully analyzed per Appendix G of the *CEQA Guidelines*. The developer or agency should ensure that impacts associated with the electric utility work are described and addressed *separately* from the impacts associated with other components of the project. This separate discussion is necessary in order to ensure that the CEQA document clearly addresses which impacts are associated with the electric utility work and which impacts are a result of the other activities associated with the project. All impacts resulting from the electric utility work on the electric facility must be less than significant, and no significant, unavoidable impacts can occur for the electric utility work to be considered exempt from the GO 131-D permitting process with the CPUC. Please refer to Appendix A, CEQA Impact Areas, for a suggested listing of impacts that should be considered as part of this analysis pursuant to Appendix G of the *CEQA Guidelines*. This listing is not all-inclusive and is meant to provide guidance regarding what topics should be addressed in the impact analysis.

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Findings

A finding in the developer's or agency's CEQA document that the project as a whole does not have a significant effect on the environment is not adequate for SDG&E claim exemption from the permitting requirements of GO 131-D to the CPUC, unless the project as a whole would result in "no impact" or a "less than significant impact" for all CEQA Impact Areas (i.e., no separate finding is necessary as all impacts associated with the proposed project would have "no impact" or a "less than significant impact"). For SDG&E to claim an exemption from GO 131-D requirements, the developer's or agency's environmental document **must make a separate finding** that the proposed electric utility work on SDG&E's electric facilities as a part of the larger project does not have the potential for a significant effect on the environment. Please see below for an example finding based on the *La Pata Avenue Gap Closure and Camino Del Rio Extension Project Addendum No. 2 to Final EIR No. 610*:

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. *As stated in the Addendum to the EIR No. 610, the project remains consistent with the goals and policies of the County of Orange's Natural Resource Element of the General Plan and the City of San Clemente's Natural and Historic/Cultural Resources Element of the General Plan. There are no local policies or ordinances protecting biological resources (e.g., a tree preservation policy or ordinance). Therefore, the proposed roadway project would not conflict with any local policies or ordinances protecting biological resources. The SDG&E utility relocation refinements would not change this finding. Therefore, impacts would remain less than significant.*

In order for the electric utility work on the electric facility to no have a significant effect on the environment, the developer or agency may need to implement mitigation measures. If mitigation measures are required for the electric utility work, the developer or agency will pay all costs associated with implementing those measures. Mitigation costs would be paid for by the developer or agency if either SDG&E can claim exemption under GO 131-D or if SDG&E needs to obtain a PTC or a CPCN from the CPUC for the electric utility work as a part of the developer's or agency's larger project as a whole. Mitigation measures provided, implemented, and paid for by the developer or agency may include, but are not limited to:

- biological and/or cultural resource surveys and related analyses
- environmental monitoring during construction (air, water, biology, cultural etc.)
- environmental mitigation such as re-vegetation, habitat restoration, purchase of mitigation land, and curation/protection of cultural or historical resources
- post-project monitoring and maintenance of re-vegetation and/or habitat restoration areas

Process

The developer or agency should use the above guidelines in preparing CEQA environmental documents for larger projects to assure that the CEQA documents contain a complete discussion of the proposed electric utility work and its potential environmental impacts. Upon the lead agency's certification of the

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environmental document, the developer or agency will provide SDG&E a copy of the resolution, ordinance or other acknowledgement prepared by the lead agency certifying the CEQA document.

Upon receiving lead agency certification of the CEQA document from the developer or agency, SDG&E will do one of the following:

- Prepare and file an Advice Letter with the CPUC for the electric utility work on its electric facilities for the developer or agency project claiming exemption under GO 131-D. This process requires approximately 6 months or more to complete.
- Submit the certified CEQA document to the CPUC along with an application for a PTC or an application for a CPCN. This process is lengthier than an Advice Letter, and can require years rather than months to complete.

If it is determined that the utility work required is statutorily or categorically exempt from CEQA pursuant to Section 15260 et seq. of the CEQA Guidelines, no Advice Letter is required to be filed with the CPUC. In such a case, SDG&E will retain the developer's or agency's CEQA document in the project file in support of a claim of exemption.

Permits

With the exception of any CPUC issued permits (PTC or CPCN), the developer or agency is solely responsible for obtaining all permits and approvals, and providing any mitigation required by those permits, for the electric utility work on SDG&E electrical facilities that are a component part of their larger project. This remains the sole responsibility of the agency or developer regardless of whether SDG&E claims an exemption from GO 131-D for the electric utility work as part of a larger project, or whether SDG&E is required to obtain an Advice Letter, PTC or CPCN for the electric utility work.

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Appendix A: CEQA Impact Areas

The following list of CEQA impact areas includes the topics that should be addressed in the impact analysis for a given project. This list is not intended to be exhaustive.

- **Land Use:** As part of the larger project, will the electric utility work on the electric facility be compatible or incompatible with the adjacent, proposed or existing, land uses (e.g. schools)? Describe.
- **Water Quality:** As part of the larger project, will the electric utility work on the electric facility change drainage or runoff patterns or otherwise adversely affect water quality? Describe how. The water quality impact analysis for the larger project should include electric utility work related water impacts in support of a finding of non-significance.
- **Air Quality:** As part of the larger project, will the electric utility work on the electric facility contribute to exceeding or impacting any air quality standards? The type, number, and duration of equipment used for electric utility work shall be included in the short-term air quality discussion and calculations. The air quality analysis for the larger project should include electric utility work related air quality impacts in support of a finding of non-significance.
- **Biological Resources:** As part of the larger project, will the electric utility work on the electric facility impact threatened or endangered species or their habitats? Describe the locations, type (such as coastal sage scrub, chaparral, wetlands, riparian, grassland etc.) and amounts of impacts. An exhibit should show the location of the electric facility, including any temporary work areas or permanent access roads, with relation to known sensitive habitats and endangered species sightings. The biological impact analysis for the larger project should include electric utility work related biological impacts in support of a finding of non-significance.
- **Aesthetics:** As part of the larger project, will the electric utility work on the electric facility create substantial light or glare, or have a negative aesthetic effect? Describe and depict in drawings, cross sections, or visual simulations as necessary to support. The visual impact analysis for the larger project should include electric utility work related cultural impacts in support of a finding of non-significance.
- **Cultural resources:** As part of the larger project, will the electric utility work on the electric facility have the potential to disturb or physically change any known archaeological, paleontological or historical resources? An exhibit should show the location of the electric facility with relation to known cultural resource locations. The cultural resource impact analysis for the larger project should include electric utility work related cultural impacts in support of a finding of non-significance.
- **Noise:** As part of the larger project, could the electric utility work on the electric facility have the potential to substantially increase noise levels to sensitive receptors? The noise study for the larger project should include electric utility work related noise impacts in support of a finding of non-significance. SDG&E can provide informational support to the developer or agency in the preparation of noise studies for the electric utility work.

Letter I: San Diego Gas and Electric

I-1: This comment states that detailed comments are attached. Each comment is addressed below.

I-2: This comment states the role of San Diego Gas and Electric (SDG&E) as a utility provider. It also states that SDG&E wants to ensure the FEIR adequately addresses the public utility implications of the proposed project. The DEIR adequately discloses potential impacts associated with the relocation of the gas line operated by SDG&E, as the area where work would be conducted for that effort is included within the project site analyzed throughout the DEIR. As this comment does not specifically state why the DEIR does not adequately address impacts, no further response can be provided. No revisions to the FEIR as a result of this comment are warranted.

I-3: This comment restates portions of the DEIR related to existing SDG&E facilities, including the energy transmission line and the gas line. As clarified in the FEIR (see Section 3.3.1.4), the gas line would not be removed from service until after the portion of the gas line is raised within the easement. The existing gas line must be kept in operation while the new portion is being raised. Once the new portion of the gas line is operational, the existing portion of the gas line will be filled with slurry and abandoned in place. This clarification does not result in any new or more severe impacts identified within the DEIR.

I-4: This comment states that SDG&E would like to request clarification from the City with regards to the Quarry Falls developer's previous coordination regarding this matter and what the preliminarily accepted approach entails (i.e., how was the determination made that the pipeline would need to be raised) in the FEIR.

The Quarry Falls developer provided a December 2004 email chain discussing the plan and profile for the 20-inch high-pressure gas line's relocation. According to the email from Russell H. Bowen, Senior Field Engineering Representative (retired), the plan view shows 40 feet of fill over the existing 20-inch gas main. The proposed profile for the road and relocated gas line show the proposed gas line at 3 feet +/- and a 5:1 slope tying into the existing ground at daylight. However, the plan and profile attachment were not included with the copy of the email received. Mr. Bowen further states that Bob Dalby will be looking at this plan and profile to see if he has any concerns, and that James Brown will take over this project for Mr. Bowen.

The Quarry Falls developer in an undated attached letter in response to the email from Mr. Bowen reiterates that Bob Dalby would be reviewing the issue of weight above the gas line. The email chain did not provide any information on how the determination was made that the pipeline would need to be raised; however, this approach had been preliminarily accepted by SDG&E,

In a July 16, 2017 discussion between City staff and the Quarry Falls developer, no additional information was available since what was provided in the December 2004 email chain. The Quarry Falls developer indicated that due to the length of time that had elapsed since prior coordination between Quarry Falls and SDG&E and in light of changing conditions that the construction of the proposed roadway connection has been determined to be foreseeable, coordination efforts between Quarry Falls and SDG&E will most likely need to recommence. This coordination would take place prior to final engineering design and before any construction activities occur. However, as such coordination is typical after conceptual approval of a project and certification of the CEQA document because detailed design specifications are not always available at the environmental analysis phase,

this does not affect the environmental analysis provided with the DEIR or require any revisions to the text of the FEIR.

I-5: This comment restates a portion of the DEIR that the electric transmission lines will not be affected by project activities and that further coordination with SDG&E will occur prior to final design regarding these lines. The comment further states that SDG&E would like to ensure that the FEIR adequately addresses any transmission line relocations that could be necessary as a result of the proposed project per CPUC General Order (GO) 131-D requirements. The existing transmission poles within the vicinity of the project site are located 150 feet to the west and 725 feet to the east of the project site and would not be affected by the proposed project. Therefore, due to the considerable distance between the proposed roadway and the existing overhead transmission poles, it is not anticipated that any transmission line relocations would be necessary as part of the proposed project. As detailed in Chapter 3, *Project Description*, of the DEIR, construction activities and the roadway alignment would be located within a portion of SDG&E's easement. As standard operating practice, the City, whenever proposing any construction, excavation, or other work within the right-of-way of another public agency or private entity (i.e., SDG&E), coordinates with that public agency or private entity prior to conducting work within the right-of-way. In this instance, the City, the Quarry Falls developer, and/or other entity responsible for implementing the proposed project would coordinate with SDG&E prior to final design and before any construction activities occur. The comment also states to refer to the attached "Guidelines for Private Developer and Agency Initiated Utility Projects that Require CEQA Environmental Documents." This comment is noted; however, the transmission lines would not be affected by project activities. No revisions to the FEIR are warranted as result of this comment.

I-6: This comment states that any changes in grade or surfacing to access roads and terrain in support of the proposed project shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities and access roads.

Please refer to Section 5.8, *Hydrology and Water Quality*, of the DEIR. The proposed project would not direct drainage within the SDG&E easement or access roads, which currently run east-west throughout the project site. The project site has a general southward stormwater flow path. Currently, stormwater is discharged onto the Quarry Falls site. The project would result in an increase in impervious surfaces that would in turn result in increased stormwater runoff. However, as a result of compliance with the Municipal Separate Storm Sewer System Permit and implementation of flow-through BMPs to address hydromodification management requirements, the increase in associated runoff would not be a substantial alteration of existing stormwater runoff patterns adjacent to the project site and would be accommodated by the existing drainage system. Roadway-generated stormwater would be directed southwards toward Quarry Falls. The comment also states that grading activities associated with the project are required to comply with SDG&E Guidelines for encroachments into rights-of-way and that they would require a "permission to grade letter" to ensure the project is reviewed by SDG&E. As standard operating practice, the City, whenever proposing any construction, excavation, or other work within the right-of-way of another public agency or private entity (e.g., SDG&E), coordinates with that public agency or private entity prior to conducting work within the right-of-way. In this instance, the City, the Quarry Falls developer, and/or other entity responsible for implementing the proposed project would coordinate with SDG&E prior to final design and before any construction activities occur. the City, the Quarry Falls developer, and/or other entity responsible for implementing the proposed project would coordinate with SDG&E prior to final design and before any construction activities occur. Any design

plans, including grading plans or geotechnical reports, will be submitted for SDG&E's review prior to any grading where SDG&E's facilities are involved.

I-8: This comment states that any temporary or permanent relocation of facilities, placement of facilities, or temporary outages shall be completed at the cost of the applicant. This comment does not address the adequacy of the DEIR, but is acknowledged and will be part of the administrative record.

I-9: This comment is similar to comment I-5; please see the response to that comment.

I-10: This comment includes the previously referenced attachment, "Guidelines for Private Developer and Agency Initiated Utility Projects that Require CEQA Environmental Documents." As previously stated, the project would not affect or otherwise impact overhead or underground electric transmission lines. The FEIR meets the requirements of the CEQA Statute and Guidelines and addresses all necessary City requirements as Lead Agency.

From: Waterman, Ryan R. <rwaterman@bhfs.com>
Sent: Tuesday, May 30, 2017 10:11 PM
To: PLN_PlanningCEQA
Cc: Marco A. Sessa (marco@sudprop.com)
Subject: Comment Letter on the Serra Mesa Community Plan Amendment Roadway Connection
Attachments: 2017.05.30 Comment letter on Serra Mesa CPA RDPEIR.pdf

J-1

Ms. Morrison, please find the attached comment letter on the Serra Mesa Community Plan Amendment Roadway Connection Project's Recirculated Draft Program Environmental Impact Report.

Best regards,

Ryan R. Waterman
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May 30, 2017

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VIA ELECTRONIC MAIL
(PLANNINGCEQA@SANDIEGO.GOV)

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, Suite 1200, East Tower, MS 413
San Diego, CA 92101

**RE: Comment Letter on the Serra Mesa Community Plan Amendment Roadway Connection
Project's Recirculated Draft Program Environmental Impact Report,
Project No. 265606 / SCH No. 2012011048**

Dear Ms. Morrison:

J-2

Please accept the following comments submitted on behalf of Quarry Falls, LLC on the Serra Mesa Community Plan Amendment Roadway Connection Project's Recirculated Draft Program Environmental Impact Report (the "RDPEIR").

I. THE QUARRY FALLS PROJECT AND THE FRANKLIN RIDGE ROAD CONNECTION

J-3

The Quarry Falls project. In 2008, the City approved the Quarry Falls project (later renamed "Civita"), which includes 4,780 residential units, 900,000 square feet of commercial and office, parks and civic/public open space, and an optional school site in Mission Valley. The Quarry Falls project repurposes the Grant family aggregate mine into a modern, walkable, mixed-use community that matches "smart growth" ideals with urban living. Since Quarry Falls was approved in 2008, a significant portion of the residential and commercial development slated for the first phase of the project has been or is being developed.

J-4

The Franklin Ridge road connection's origins. Leading up to the Quarry Falls project's approval by the City, there were significant discussions surrounding the possibility of developing a road connection between Mission Valley and Phyllis Place in the northern portion of the Quarry Falls project area within the Serra Mesa Community Planning Area. In fact, during Quarry Falls' environmental review, the City directed Quarry Falls, LLC to analyze the possibility of a road connection in the alternatives analysis in its Program Environmental Impact Report. The 2008 Quarry Falls Final Program Environmental Impact Report (the "Quarry Falls FPEIR") analyzed the potential environmental impacts of various alternatives to the project with and without the road connection, and Alternative 4 specifically analyzed the environmental impacts of the road connection itself. (Quarry Falls FPEIR at 10-39.)

At the same time it approved Quarry Falls, the City directed staff to analyze a potential Serra Mesa Community Plan Amendment ("CPA") to include a road connection between Phyllis Place and Mission Valley. (City Council Resolution R-304297 (Oct. 21, 2008).)

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San Diego, CA 92101-5000
main 619.702.6100

018450\0003\15716142.1

J-5

Quarry Falls, LLC's position on the road connection remains unchanged. Quarry Falls, LLC's position remains the same as previously explained in its July 1, 2016, comment letter on the Draft Program EIR. While Quarry Falls, LLC is neutral with respect to whether the City should or should not approve the Serra Mesa CPA, Quarry Falls, LLC will build the Franklin Ridge road connection if the City approves the Serra Mesa CPA before substantial investments in Phase 2 road network improvements have been made and the City reconciles the Quarry Falls mitigation measures that must change in light of the road connection. However, Quarry Falls, LLC will not build the road connection if the mitigation measures required for the road connection are substantially revised beyond what was anticipated in 2008, or if the City selects Alternative 2 as an emergency access only drive has already been constructed on the East end of Kaplan Dr.

II. ENVIRONMENTAL SETTING AND PROJECT DESCRIPTION

J-6

The RDPEIR states that, "[t]o the extent that this EIR identifies mitigation for any impact that was also identified in the Quarry Falls FPEIR and for which mitigation was previously imposed, the mitigation identified in this EIR should be considered to take precedence because its analysis is based on updated data." (RDPEIR, at 3-4.) The RDPEIR also attempts to shift the burden of reconciling these mitigation measures to Quarry Falls, LLC by calling for the developer to demonstrate to the City's satisfaction that "the mitigation sufficiently addresses that impact." (*Id.*)

There are at least two problems with this statement. First, the City lacks the authority to unilaterally revise mitigation measures adopted for the Quarry Falls FPEIR. Only if Quarry Falls LLC applies to the City to reconsider mitigation measures adopted for the Quarry Falls FPEIR could the City revise the mitigation measures set forth in the Quarry Falls FPEIR.

J-7

Second, when the RDPEIR suggests that there may be mitigation measures in the RDPEIR that will "take precedence" over mitigation measures in the Quarry Falls FPEIR, the RDPEIR never identifies which mitigation measures to which it is referring (for example, by including a table that reconciles Quarry Falls' mitigation measures with the RDPEIR's mitigation measures). The RDPEIR also attempts to defer any reconciliation to a later process. To assist the public's understanding, Exhibit A has been attached to this letter to reconcile which mitigation measures from the existing Quarry Falls Transportation Phasing Plan would change, and how the RDPEIR's proposed mitigation measures compare to the mitigation measures proposed for Alternative 4 (with road connection alternative) in the Quarry Falls EIR.

J-8

Next, the RDPEIR also states, "[t]o the extent that the Quarry Falls EIR studied locations that were not studied in this EIR, the mitigation identified in the Quarry Falls EIR for those impacts would not be affected." (RDPEIR, at 3-4.) As demonstrated in Exhibit A, there are mitigation measures in the Quarry Falls Transportation Phasing Plan that will change with the road connection. Accordingly, this statement is overbroad and inaccurate. Instead, the RDPEIR should simply refer to the earlier description of the substantial conformance review ("SCR") process Quarry Falls, LLC could go through to determine "the appropriateness of amending [Quarry Falls'] mitigation measures so as to help ensure that the mitigation imposed addresses the actual impacts of the project" (*Id.*)

J-9

As a point of clarification, the RDPEIR refers to the Quarry Falls mixed-use project as "Quarry Falls" throughout the document. In fact, Quarry Falls was re-branded as "Civita" after the City approved the project in 2008, and the public may be confused by the reference throughout the RDPEIR to the old name of the project. For clarity, please add a footnote on p. 3-3 that explains that the Quarry Falls project has been re-branded as Civita.

J-10

Finally, the RDPEIR indicates that the existing SDG&E natural gas line would be removed after following construction of the new portion of the line. (RDPEIR, at 3-7.) It is our understanding that the existing line

J-10
cont. | must be kept in operation while the new line is being raised. Once the new line is operational, the existing line will be filled with slurry and abandoned in place.

III. ENVIRONMENTAL ANALYSIS

A. Chapter 5.1 Land Use

J-11 | The RDPEIR's analysis of Issue 1, land use compatibility concludes that the "proposed project would not require a deviation or variance from building development regulations." (RDPEIR, at 5.1-12.) In Chapter 5.2, however, the RDPEIR concludes that construction of a signalized intersection at Phyllis Place for the road connection "would . . . result in possibly unsafe conditions for motorists entering or exiting the City View Church parking lot . . .", and identifies MM-TRAF-19, which calls for relocating the City View Church driveway. Because the City View Church is privately owned, the RDPEIR assumes that MM-TRAF-19 would not be implemented and that the impact would remain significant and unavoidable. (*Id.* at 5.2-47-48.)

If the RDPEIR assumes that the City View Church driveway will not be relocated and a traffic hazard will exist, does that mean that the project will in fact require a deviation or variance from the City Code, in contrast with the RDPEIR's conclusion for Issue 1 (RDPEIR, at 5.1-12), because the installation of the Phyllis Place signal will create an inconsistency with City Code?

B. Chapter 5.2. Transportation and Circulation

J-12 | The RDPEIR's traffic analysis raises questions concerning proposed mitigation measures, the scope of the traffic analysis, and several minor consistency issues.

1. Mitigation Measures

J-13 | Mitigation measure ("MM") TRAF-8 proposes to widen Franklin Ridge Road between Via Alta and Civita Boulevard to four lanes (two lanes each direction) and a center lane. The RDPEIR correctly determines that MM-TRAF-8 is infeasible because it would conflict with applicable land use and mobility policies. (RDPEIR, at 5.2-39.) In particular, MM-TRAF-8 is infeasible because it would conflict with the Quarry Falls Specific Plan, which designed the street system "to achieve a high degree of compatibility between vehicles, pedestrians, and bicyclists." (Quarry Falls Specific Plan, at 4-3.) Pursuant to the Quarry Falls Specific Plan, Franklin Ridge Road between Via Alta and Civita Boulevard is a modified two-lane collector with left-turn pockets that accommodates Class II bikeways and a six-foot sidewalk separated from the streets by an eight-foot parkway, which will not allow parking. (*Id.* at 4-13.) MM-TRAF-8 is inconsistent with this design and must be rejected because it would destroy the multi-modal design inherent in the Quarry Falls Specific Plan.

J-14 | MM-TRAF-13 would reconfigure Rio San Diego Drive between Qualcomm Way and Rio Bonito Way to a four-lane Major Arterial by including a median. The RDPEIR suggests that this mitigation measure may be infeasible "in light of countervailing considerations," but never defines what those considerations might be. (See RDPEIR, at 5.2-40.) Please add more detail to support the infeasibility conclusion.

J-15 | MM-TRAF-18 calls for the applicant to make a fair share contribution, in coordination with Caltrans, which would be applied toward an additional regular traffic ramp lane on the I-805 SB on-ramp from Murray Ridge Road. (RDPEIR, at 5.2-41.) The RDPEIR concludes that MM-TRAF-18 is feasible and would mitigate Impact TRAF-18 to a less than significant level. (*Id.* at 5.2-42.)

While the CEQA Guidelines and case law recognize that a fair share mitigation program can be an acceptable way of addressing a cumulative impact, the fair share requirement "must be part of a

J-15
cont.

reasonable plan of actual mitigation that the relevant agency commits itself to implementing.” (*Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1188; see also CEQA Guidelines §15130(a)(3).) MM-TRAF-18 should be revised to incorporate the characteristics of fair share mitigation program by (a) identifying an established Caltrans infrastructure fund for the applicant to contribute to, (b) identifying the fair share amount or the formula by which a fair share contribution could be calculated, or (c) providing substantial evidence that the fair share mitigation program will reasonably result in the implementation of the mitigation measure. (*Anderson First Coalition*, 130 Cal.App.4th at p. 1189.)

Furthermore, because MM-TRAF-18 does not indicate how the fair share contribution would be calculated, Quarry Falls, LLC cannot estimate what its fair share contribution would be, or evaluate whether its commitments to improve the regional infrastructure system through the Quarry Falls project plus MM-TRAF-18 would exceed its fair share of regional transportation improvements.

J-16

MM-TRAF-19 would relocate the driveway of the City View Church to eliminate Impact TRAF-19, which recognizes a traffic hazard for vehicles entering or exiting the church property due to the new four-way intersection at Phyllis Place and Franklin Ridge Road. The RDPEIR finds that MM-TRAF-19 is legally infeasible, however, because City View Church is privately owned and the City cannot require the church to relocate its driveway.

The City should consider whether there may be other ways to mitigate this impact without requiring the City View Church to relocate its driveway. For example, could MM-TRAF-3 be revised to specify that a raised median will be installed in Phyllis Place to prevent left turns into or out of the City View Church at the north side driveway? Or could the north side driveway be signed to require vehicles exiting the driveway to only turn right?

2. Minor Corrections

J-17

Finally, the RDPEIR should be corrected to resolve several minor mislabeling issues:

- The reference to “existing intersections” at 5.2-4 should be to Figure 5.2-3, not Figure 5.2-1.

J-18

- Figure 5.2-3 is missing the numbering that corresponds with the intersections as defined on 5.2-4.

J-19

- Figure 5.2-2 does not include Quarry Falls roads that were open and operational as of April 2015.

C. Chapter 5.5 Biological Resources

J-20

Quarry Falls has already identified and mitigated for certain biological resource impacts within the project area. (Quarry Falls FPEIR, MM 5.6-2 [requiring acquisition of 1.08 credits from San Diego Habitat Acquisition Fund]; Fig. 5.6-1 [identifying coastal sage scrub habitat within road connection footprint].)

Quarry Falls acquired the 1.08 credits from the San Diego Habitat Acquisition Fund, which the City’s records should reflect. The City should reconcile the biological mitigation Quarry Falls has already acquired and should conclude that Impact BIO-3 to 0.25 acres of coastal sage scrub habitat has already been accounted for and that MM BIO-2 is not necessary to mitigate any environmental impact.

J-21

IV. CUMULATIVE IMPACTS

The cumulative analysis also identifies Impact TRAF-18 as being mitigated for the I-805 SB on-ramp at Murray Ridge Road. (RDPEIR, at 6-14.) As discussed in Section III.B, above, however, MM-TRAF-18 needs to be revised.

Thank you for the opportunity to comment on the RDPEIR. Please do not hesitate to contact me if I can be of any service.

Sincerely,



Ryan R. Waterman

Attachment

Cc: Mr. Marco Sessa, Quarry Falls, LLC

J-22

EXHIBIT A

**COMPARING QUARRY FALLS TRANSPORTATION PHASING PLAN (WITHOUT ROAD
CONNECTION) TO MITIGATION REQUIRED BY THE
SERRA MESA COMMUNITY PLAN AMENDMENT PROGRAM EIR**

Table 1. Quarry Falls Program EIR Current Transportation Phasing Plan – Mitigation Measures Not Addressed by Serra Mesa Community Plan Amendment Program EIR That Will Not Change

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description
1a	Friars Road/SR-163 Interchange	1	Intersection Improvements (widening and lane reconfigurations). \$5,000,000 payment towards Friars & I-163
2	Mission Center Road/Quarry Falls Blvd	1	Intersection Improvements (widening and lane reconfigurations)
3	Mission Center Road from Quarry Falls Blvd to Friars Road	1	Roadway Segment Improvements (widening)
4	Friars Road from Qualcomm Way to Mission Center Road	1	Roadway Segment Improvements (widening)
7	Murray Ridge Road/Mission Center Road	1	Intersection Improvements (traffic signal installation, widening and lane reconfigurations)
9	Murray Ridge Road/Pinecrest Avenue	1	Intersection Improvements (traffic signal installation)
10	Friars Road/Avenida De Las Tiendas	1	Intersection Improvements (restriping)
11	Texas Street from Camino del Rio South to El Cajon Blvd	1	Sidewalk/Pedestrian Safety Enhancement Improvements
12	Transportation Demand Management Measures	1	TDM Plan

J-22
cont.

J-22
 cont.

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description
14	Friars Road/Fashion Valley Road	2	Intersection Improvements (restriping)
15a ¹	Friars Road/SR-163 Interchange	2	Intersection Improvements (widening and lane reconfigurations)
16	Pedestrian Bridge across Friars Road	2	Installation of pedestrian bridge
17	Friars Road EB Ramp/Qualcomm Way	2	Intersection Improvements (widening and lane reconfigurations)
19	Friars Road/I-15 SB Off-Ramp	2	Intersection Improvements (widening and lane reconfigurations)
20	Texas Street/El Cajon Blvd	3	Intersection Improvements (widening and lane reconfigurations)
22	Friars Road/Santo Road	4	Fair share Contribution - Intersection improvements (16%)
23	Mission Gorge Road/Zion Avenue	4	Fair share Contribution - Intersection improvements (23%)
24	Mission Center Road/Camino De La Reina	4	Fair share Contribution - Intersection improvements (15%)

¹ Mitigation measure 15a would shift from Quarry Falls Phase 2 to Phase 3 with the road connection.

J-22
 cont.

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description
25	Qualcomm Way/Camino De La Reina	4	Fair share Contribution - Intersection improvements (38%)
26	Texas Street/Camino Del Rio South	4	Fair share Contribution - Intersection improvements (21%)
27	Texas Street/Madison Street	4	Fair share Contribution - Intersection improvements (30%)
28	Rio San Diego Drive/Fenton Parkway	4	Fair share Contribution - Intersection improvements (11%)

Table 2. Quarry Falls Program EIR Current Transportation Phasing Plan – Mitigation Measures That Are Included in the Serra Mesa Community Plan Amendment Program EIR

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description	Serra Mesa DEIR Impact #	Serra Mesa Location	Serra Mesa Scenario	Serra Mesa Description
5	Phyllis Place/I-805 SB Ramp	1	Intersection Improvements (traffic signal interconnect, widenings and lane reconfigurations)	TRAF-6 & TRAF-16	Murray Ridge Road/I-805 SB Ramp	Near-Term 2017 & Long-Term 2035	Intersection Improvements (widenings and lane reconfigurations)
6	Phyllis Place/I-805 NB Ramp	1	Intersection Improvements (traffic signal installation, widenings and lane reconfigurations)	TRAF-5 & TRAF-15	Murray Ridge Road/I-805 NB Ramp	Near-Term 2017 & Long-Term 2035	Intersection Improvements (restriping and lane reconfigurations, (widening in 2035))
8a	Murray Ridge Road from NB I-805 Ramps to Pinecrest Avenue	1	Roadway Segment Improvements (restriping)	TRAF-1 & TRAF-9	Murray Ridge Road from Mission Center Road to Pinecrest Avenue	Near-Term 2017 & Long-Term 2035	Roadway Segment Improvements (restriping)
8b	Murray Ridge Road Bridge over I-805 (restriping to 5 lanes)	1	Roadway Segment Improvements (restriping)	TRAF-4 & TRAF-12	Phyllis Place from I-805 SB Ramp to I-805 NB Ramp	Near-Term 2017 & Long-Term 2035	Roadway Segment Improvements (restriping)

J-22
cont.

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description	Serra Mesa DEIR Impact #	Serra Mesa Location	Serra Mesa Scenario	Serra Mesa Description
18	Friars Road WB Ramp/Qualcomm Way	2	Intersection Improvements (widening and lane reconfigurations)	TRAF-6	Qualcomm Way/Friars Road WB	Near-Term 2017	Intersection Improvements (widening and lane reconfigurations)

J-22
cont.

Table 3. Mitigation Measures in the Serra Mesa Community Plan Amendment Program EIR That Are Feasible and Not Included in the Quarry Falls Program EIR Current Transportation Phasing Plan

Serra Mesa DEIR Impact #	Serra Mesa Location	Serra Mesa Scenario	Serra Mesa Description
TRAF-3 & TRAF-11	Phyllis Place from Franklin Ridge Road to I-805 SB Ramp	Near-Term 2017	Roadway Segment Improvements (widening and restriping)
TRAF-17	Via Alta/Franklin Ridge Road	Long-Term 2035	Intersection Improvements (restriping and lane reconfigurations)
TRAF-18	I-805 SB Ramp/Murray Ridge Road	Long-Term 2035	Fair share Contribution - Ramp meter/lane improvements

Table 4. Quarry Falls Program EIR Current Transportation Phasing Plan – Mitigation Measures That Are No Longer Necessary With the Road Connection

Quarry Falls EIR Mitigation #	Quarry Falls Location	Quarry Falls Phase #	Quarry Falls Description
13	Mission Center Road from I-805 to Murray Ridge Road	2	Roadway Segment Improvements (widening)
15b	Mission Center Road/I-8 Interchange	2	Provide \$1,000,000 to Interchange Project Study
15b	Mission Center Road/I-8 Interchange	3	Intersection Improvements (widening and lane reconfigurations)
21	Qualcomm Way/I-8 WB Off Ramp	3	Intersection and Ramp Improvements (widening and reconfigurations)

J-22
cont.

Letter J: Brownstein Hyatt Farber Schreck, LLP

J-1: This comment states that detailed comments are attached. Each comment is addressed below.

J-2: This comment states that detailed comments are attached. Each comment is addressed below.

J-3: This comment is the author's summary of the Quarry Falls project and states that a significant portion of development within the first phase of the Quarry Falls project has occurred. Chapter 2, *Environmental Setting*, of the DEIR, states that a portion of the project site is within the Quarry Falls site, and that the Quarry Falls project was approved in 2008 and has been in various phases of construction since that time. It also states (DEIR Page 2-1) that: "the physical existing conditions that represent the environmental setting discussed are from 2015. There is the possibility that other uses within the Quarry Falls site have been constructed during the time this DEIR was being prepared. Where necessary, this DEIR analyzes reasonably foreseeable uses that have been approved within the Quarry Falls Program EIR (PEIR)." In addition, please note that the notice of preparation for the proposed project was circulated in 2012.

This comment does not specifically address the adequacy of the DEIR.

J-4: This comment provides the author's summary of background and origins of the proposed project. The background of the proposed project is detailed Section 3.2 of the DEIR.

This comment does not specifically address the adequacy of the DEIR.

J-5: This comment expresses the opinion of the commenter that Quarry Falls, LLC is neutral with respect to whether the City should approve the proposed project. It also states that Quarry Falls, LLC will build the proposed roadway if the City reconciles the Quarry Falls mitigation measures that must change in light of the road connection. The comment goes on to state that Quarry Falls, LLC will not build the road connection if the mitigation measures required for the road connection are substantially revised beyond what was anticipated in 2008, or if the City selects Alternative 2 as an emergency access only drive has already been constructed on the east end of Kaplan Drive.

This comment states the commenter's preference and intentions, but does not specifically address the adequacy of the DEIR. In addition, the construction and operation of the proposed project is subject to the issuance of all applicable permits and approval by the decision-maker.

J-6: This comment restates a portion of the DEIR and first expresses the opinion that the DEIR attempts to shift the burden of reconciling these mitigation measures to Quarry Falls, LLC by calling for the developer to demonstrate to the City's satisfaction that the mitigation measure(s) sufficiently addresses that impact. The comment also states that the City lacks authority to revise mitigation measures adopted for the Quarry Falls PEIR.

The comment does not identify facts related to the project's possible impact on the environment or a means to mitigate such impact that requires a response per CEQA. The DEIR evaluates and sets forth mitigation, where necessary, for impacts associated with construction and operation of the proposed roadway connection. This DEIR does not evaluate or modify mitigation measures or permit conditions imposed on other projects. No changes to the FEIR are required.

J-7: The comment states that when the DEIR suggests that there may be mitigation measures that will take precedence over mitigation measures in the Quarry Falls PEIR, the DEIR never identifies

which mitigation measures to which it is referring and that it also attempts to defer any reconciliation to a later process.

Please see the response to comment J-6. The process of modifying any mitigation from the Quarry Falls EIR would require coordination with the Quarry Falls developer and potentially additional CEQA compliance.

J-8: This comment excerpts a portion of the DEIR (Page 3-4.), which states “[t]o the extent that the Quarry Falls EIR studied locations that were not studied in this EIR, the mitigation identified in the Quarry Falls EIR for those impacts would not be affected,” and expresses the opinion that the statement is too broad and inaccurate.

Please see the responses to comments J-6 and J-7. Certification of the EIR for this project would not automatically revise any mitigation identified in the Quarry Falls PEIR for those impacts; any modifications to mitigation imposed on previously approved projects would require review and approval by the City. Please refer to the process that is fully detailed within the same section of the DEIR. The quoted statement has been revised in the DEIR, as shown in the FEIR.

J-9: This comment states that Quarry Falls was re-branded as “Civita” after the City approved the project in 2008, and the public may be confused by the reference throughout the DEIR to the old name of the project. It also requests that a footnote should be added that explains that the Quarry Falls project has been re-branded as Civita. Please refer to Chapter 1, *Introduction*, within the DEIR. At the bottom of Page 1-4, a footnote is included that states: “The Quarry Falls Project is now called Civita; however, for the purposes of this EIR and consistency, the project will be referred to as “Quarry Falls” throughout because of the numerous references to the Quarry Falls PEIR.” Therefore, the DEIR included a clear reference that it would be referred to as Quarry Falls throughout the document and therefore would not lead to any confusion by readers of the DEIR. No revisions to the FEIR are warranted as a result of this comment.

J-10: This comment indicates that the existing portion of the gas line that traverses the project site would be filled with slurry and abandoned in place instead of being removed.

The FEIR (see Section 3.3.1.4) has been clarified to indicate that the gas line would not be removed from service until after the portion of the gas line is raised within the easement. The existing gas line must be kept in operation while the new portion is being raised. Once the new portion of the gas line is operational, the existing portion of the gas line would be filled with slurry and abandoned in place. This clarification does not result in any new or more severe significant impacts previously identified within the DEIR. In addition, please see the responses to Letter I (San Diego Gas & Electric).

J-11: This comment asks that if the DEIR assumes that the City View Church driveway would not be relocated and a traffic hazard would exist, if the project would require a deviation or variance from the City Code because the installation of the Phyllis Place signal would create an inconsistency with City Code.

It is not clear as to which portion of the City’s Municipal Code or other regulation the commenter is referring to. No sight lines would change with the proposed project. Even though the additional traffic volumes from vehicles traveling eastbound on Phyllis Place would require more attention from the driver planning to turn left, the proposed project would not conflict with existing development regulations. It should be noted that the western church driveway would not have the same challenge because it is located farther from the proposed intersection. The analysis within the DEIR assumes that MM-TRAF-19 would not be implemented, as the City cannot enforce a mitigation

measure onto a private property (City View Church). However, the City will continue to work with the ultimate developer of the roadway and the private entities (City View Church) on potential solutions to improving eastbound traffic leaving the City View Church parking lot. At this time, no deviations or variances would be sought from existing development regulations. No revisions to the FEIR are warranted as a result of this comment.

J-12: This comment states that the traffic analysis within the DEIR raises questions concerning proposed mitigation measures, the scope of the traffic analysis, and several minor consistency issues.

This is an introductory comment and specific comments follow.

J-13: This comment states that MM-TRAF-8 is infeasible and should be rejected.

As detailed in Section 5.2, *Transportation and Circulation* (see Section 5.2.5.2), implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway would provide Class II bikeways and a 6-foot-wide sidewalk, separated from the street by an 8-foot-wide parkway; some of these amenities would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable. No revisions to the FEIR are warranted as a result of this comment.

J-14: The comment notes that MM-TRAF-13 would require reconfiguration of Rio San Diego Drive between Qualcomm and Rio Bonito Way and notes that the DEIR states that this measure may be infeasible. The commenter asks that the FEIR explain why it would be infeasible.

As detailed in Section 5.2, *Transportation and Circulation* (see Section 5.2.5.2), this segment of the roadway is likely to be reclassified as a four-lane Major Arterial as part of the forthcoming update to the Mission Valley Community Plan, which in turn may require a median or other reconfiguration in order to meet that classification. Due to the uncertainty of being able to implement this measure in light of countervailing considerations within the community plan, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable. The DEIR does not determine the feasibility of the mitigation measure or make the ultimate determination if it will be implemented. Rather, the determination of the feasibility of mitigation measures is included in the Findings of Fact (see, for example, Section 15091 of the CEQA Guidelines). No revisions to the FEIR are warranted as a result of this comment.

J-15: This comment restates what is required of MM-TRAF-18 and states that any fair share requirement must be part of a reasonable plan of actual mitigation. The comment asks that MM-TRAF-18 be revised to incorporate characteristics of fair share mitigation program by (a) identifying an established Caltrans infrastructure fund for the applicant to contribute to, (b) identifying the fair share amount or the formula by which a fair share contribution could be calculated, or (c) provide substantial evidence that the fair share mitigation will reasonably result in the implementation of the mitigation measure.

If the City were the applicant for the additional regular traffic ramp lane on the I-805 southbound on-ramp from Murray Ridge Road (MM-TRAF-18), the project would have to be ensured to be fully funded. Sources of that funding would be CIP and fair share contribution agreements from others. If

another entity, such as the Quarry Falls developer, were the applicant, in coordination with Caltrans, at the time of permitting, they would calculate their fair share based on the industry agreed-upon fair share formula. This formula with a description of variables is included as Attachment C to these responses to comments, and has been added as Appendix X in the FEIR. This addition does not result in the increase of the severity of the impacts or represent significant new information.

Caltrans advised City staff that there is not a specific fund currently set up for the fair share contribution for the I-805 southbound on-ramp at Murray Ridge Road (MM-TRAF-18), which is within Caltrans jurisdiction. Caltrans cannot initiate that fund until there is money ready to be put toward that effort, which would all be part of the permitting process with Caltrans. The Caltrans document "Local Development – Intergovernmental Review Program: Traffic Mitigation Agreements," included as Attachment D to these responses to comments, details that process. There has been no improvement to this ramp beyond that detailed in the existing conditions, and the improvement is/would not be part of the CIP program.

J-16: The comment states that the City should consider whether there are other ways to mitigate the impact regarding the City View Church driveway (Impact TRAF-19). The comment suggests that MM-TRAF-3 could be revised to include a requirement that a raised median is installed, which would preclude left turns from the church. The comment also states that a sign could be installed to require vehicles exiting the driveway to only turn right.

Like the inability to move the driveway to the west, these suggestions may also infringe on the conditional use permit (CUP) of the City View Church. The City View Church CUP specifies that cars leaving the driveway would be allowed to make left- or right-hand turns when leaving the driveway. Therefore, it would require coordination and collaboration with the City View Church to construct a median or otherwise prevent cars from making a left-hand turn from that facility; however, as the City View Church is not proposing to build or construct the roadway, there is no nexus to require the additions or prevent left turns. As previously mentioned, the City will continue to work with the ultimate developer of the proposed roadway connection and the private entities (City View Church) on potential solutions to the traffic hazard identified. No changes to the FEIR are required.

J-17: This comment states that the figure reference on page 5.2-4 should be revised to Figure 5.2-3 instead of Figure 5.2-1.

Figure 5.2-1 is an incorrect reference and this figure has been corrected to Figure 5.2-3 within the FEIR. This revision does not result in the increase of the severity of the impacts or represent significant new information.

J-18: This comment states that Figure 5.2-3 is missing the corresponding intersections to the numbering on page 5.2-4.

The map that includes the corresponding intersections to the numbering on page 5.2-4 of the DEIR is included in Figure 1-1, *Project Study Area*, of the KOA TIS, included in Appendix C of the DEIR. The FEIR has been corrected. This revision does not result in an increase of the severity of the impacts or represent significant new information as this information was available in the traffic study appended to the EIR and circulated for public review.

J-19: This comment states the Figure 5.2-2 does not include roadways within Quarry Falls that were open and operational as of April 2015.

Please refer to Figure 2-4, Existing Roadways, within the DEIR. This figure showed the existing roadways that were operational as of April 2015. Figure 5.2-2 shows the existing roadway system as of 2012, when traffic counts were conducted for the proposed project. No revisions to the FEIR are warranted as a result of this comment.

J-20: This comment states that Quarry Falls has already identified and mitigated for certain biological resource impacts within the project area.

The mitigation measure included for this referenced impact, as detailed within Section 5.5, *Biological Resources*, states (emphasis added): “Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, *evidence shall be provided* that demonstrates a total of 0.25 acre of credit from the San Diego Habitat Acquisition Fund or another approved mitigation bank (such as Marron Valley) has been acquired to mitigate the loss of disturbed coastal sage scrub (Tier II).” Once the applicant has provided the evidence, this mitigation measure would be considered satisfied if the project is approved and the MMRP is adopted. No revisions to the FEIR are warranted as a result of this comment.

J-21: Please see the response to comment J-15. This comment also includes a closing statement thanking the City for the opportunity to comment on the DEIR.

J-22: The commenter provides a list of mitigation measures from the previously approved Quarry Falls EIR. Please see the responses to J-6 and J-7.

From: Craig Sherman <craigshermanapc@gmail.com>
Sent: Tuesday, May 30, 2017 5:00 PM
To: PLN_PlanningCEQA
Cc: c.a.moore@sbcglobal.net
Subject: Comments on Recirculated DEIR – SMCP Road Project No. 265605 (SCH No. 2012011048)
Attachments: Comment ltr 5-30-17 (final).pdf

Please see the attached. Please confirm receipt. Thank you.

Re: Comments on the Recirculated DEIR – Serra Mesa Community Plan Roadway Connection, Project No. 265605 (SCH No. 2012011048)

c/o Susan Morrison, Environmental Planner

PLANNING DEPARTMENT, CITY OF SAN DIEGO

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Via Email

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Susan Morrison, Environmental Planner

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Re: Comments on the Recirculated DEIR – Serra Mesa Community Plan Roadway
Connection, Project No. 265605 (SCH No. 2012011048)

K-2

This office represents the Serra Mesa Community Council for the purpose reviewing, commenting and seeking to enforce local and state laws regarding the completeness and legal sufficiency of the March 29, 2017 recirculated draft environmental impact report (Rec-DEIR) for the proposed and (currently)¹ described project: Serra Mesa Community Plan Amendment Roadway Connection, Project No. 265605 (“Project”).

Prior and New Recirculated Draft EIRs

K-3

The Rec-DEIR for the Project is *generally* stated as being “recirculated for an additional public review [because] significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review, but before certification.” (Notice of Availability, Mar. 29, 2017) However, neither the Rec-DEIR, nor any of its notices or disclosures, identify what changes were made in hundreds of pages of the original April 18, 2016 noticed and available draft program environmental impact report (DPEIR) and appendices thereto. This is a violation of CEQA Guidelines § 15088, subs. (f)(1), (g).

K-4

As you are aware, but not disclosed in the Rec-DEIR, dozens of civic groups, and corporations, and hundreds of individuals attended meetings, reviewed, and then comment on the April 18, 2016 DPEIR only now having to possibly do it all again *without knowing* what material or substantive changes City made to the DPEIR, that is now repackaged and being noticed and recirculated in the Rec-DEIR.

K-5

In addition to the specific provisions regarding recirculated draft EIRs, CEQA requires candid disclosures and is not designed or intended to be a guessing game or fishing expedition. (Laurel Heights Improvement Assn. v. Regents of Univ. of Cal., (1988) 47 Cal.3d 376, 394 [“A fundamental purpose of an EIR is to provide decision makers with information they can use in

¹ Since originally conceived in 2011 and formally “noticed” for study in 2012, the underlying project has gone through numerous iterations, including project descriptions, type of CEQA document, manner and purpose and phasing, stated goals and objectives; not to mention equivocal commitments about stated availability, willingness, and phasing – about whether stated mitigation measures would be implemented (or not).

Page Two
May 30, 2017
Recirculated DEIR, Project No. 265605

K-5
cont.

deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.”].) Please identify, by providing either, or both: (a) a list of material changes in the project design and/or study, and (b) an interlineated and strike-out version of the Rec-DEIR and its appendices so that the public, third party agencies, and decision-makers know what to focus on *during their second reading and comments* such that meaningful comment can be provided. (CEQA Guidelines § 15088, subs. (f)(1), (g))

In response to the numerous, and presumably many hundreds of, pages of commenting on the DPEIR, City apparently made a “determination [] in response to comments received during public review of the Draft EIR [for the] public review concluded on June 20, 2016.”

K-6

As part of the revised and recirculated document, CEQA requires lead agency explanation and disclosures in any recirculated, supplemental, or addendum of a previously certified or circulated EIR, so that a reader knows what to look for and focus on, including the *substantive* basis (not merely legal basis) for the changes and recirculation.

The recirculation and re-drafted decision of City, to essentially change the label of the draft CEQA document from a Community Plan Amendment and Program EIR (the “DPEIR”) to a Community Plan Amendment for a Road Connection (with foreseeability of actually building the subject road connection) (now the “Rec-DEIR”), does not inform any reader what material differences have been made to the proposed project, project alternatives, mitigations measures and the like. As one commenter has previously pointed-out, the label attached to the CEQA document is not as important as the contents therein. (Citizens for a Sustainable Treasure Island v. City and County of San Francisco, (2014) 227 Cal.App.4th 1036, 1051)

K-7

As a result of not explaining what is new and different in the Rec-DEIR, City is now required to respond to comments made on both the original DPEIR and the Rec-DEIR to both (a) explain whether or not the original comments were reviewed and addressed (including how and why), and (b) whether the comments remain applicable to the Rec-DEIR, and whether and how they have been addressed. Because responses to comments were not given for the DPEIR, to the extent those prior comments have not been FULLY addressed, they need to be reviewed in the context of the Rec-DEIR. Thus, for each set of original submitted comments on the April 18, 2016 DPEIR, mandatory CEQA responses to comment need to be given for both the original comment (and applicability), and whether and how it has been addressed in the Rec-DEIR.

K-8

For example, this commenter questions which, if any, of the original (Appx. A-G) and recirculated (Appx. A-H) appendices have been changed. If it is just that the Appendix H has been added and is new, please explain how and why. If there were any changes or updates, or new or significant information added to prior Appendices A-G, please identify each and explain how they were changed and why – i.e., whether impacts are reduced, increased, or unchanged.

Page Three
May 30, 2017
Recirculated DEIR, Project No. 265605

Incorporation of All Prior DPEIR Comments

K-9

This office, my client, as well as other entities, civic groups, and members of the public have reviewed, studied, and provided detailed and timely written comments about the proposed project, alternatives to the project, and mitigation measures as set forth in the DPEIR. It is requested (and required by law) that each of those prior written comments be reviewed, considered, and responded to as part of City now moving forward on the Rec-DEIR. Therefore, this written comment incorporates not only the July 5, 2016 prior written comment by this office, but also all written comments prepared and submitted in response to the DPEIR in June and July of last year.

Notwithstanding the failure to both (a) advise the public and other agencies if only new comments would be considered, and (b) what are the material changes (CEQA Guidelines § 15088, subds. (f)(1), (g)), City is additionally required to address all comments because “In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.” (CEQA Guidelines § 15088, subd. (f))

K-10

In addition to those prior June and July 2016 comments submitted on the DPEIR by this office and others, the following additional comments are presented on the Rec-DEIR for lead agency review and response:

The Rec-DEIR Fails to Set Forth, Evaluate, and Consider a Reasonable Range of Project Alternatives

K-11

An accurate, stable and complete project description is the *sine qua non* of an informative and legally adequate EIR; without it public disclosure and informed decision-making is stymied. (County of Inyo v. City of Los Angeles, (1977) 71 Cal.App.3d 185, 192) City has now changed the goals, purposes, and definition of the Project multiple times. Please set forth each of the changes to the goals, purposes, and definition of the Project (including deletions, additions and amendments) and explain why each was added, eliminated, or amended.

K-12

Contrary to the enacted direction and purpose enunciated by the city council to initiate review and consideration of a possible community plan amendment to the Serra Mesa Community Plan (SMCP), the DPEIR, (and now the Rec-DEIR), have redefined the Project description, purposes, and goals, in a manner that has impaired the ability of the City to select and consider a reasonable range of project alternatives.

K-13

Additionally, the refusal to consider and reject “facially valid” impact reducing alternative or mitigation is both a procedural and substantive violation of CEQA. (Los Angeles Unified School Dist. v. City of Los Angeles, (1997) 58 Cal.App.4th 1019, 1028-1031.) There are at least two reasons why City should consider reevaluating project alternatives and not move forward with approval or certification of the Rec-DEIR. First, City failed to present a reasonable range of project alternatives because it did not correctly include or conclude analyses of one or more identified adverse effects or mitigating alternatives. (Los Angeles Unified, *supra* at 1028-1031)

Page Four
May 30, 2017
Recirculated DEIR, Project No. 265605

K-13
cont.

Particularly, the City was given at least two feasible alternatives – (1) a Mission Valley community plan amendment consistency option, and (2) an alternative that improves the existing road network (including Mission Center Road and Mission Village Drive). City never properly analyzed or considered these possible impact-reducing solutions as alternatives.

K-14

City does not set forth and consider a reasonable range of project alternatives. Instead, the City considered only one (1) alternative for bicycle, pedestrian, and emergency access, which is essentially the same as the no project alternative because current access for those modes of travel are already available and are being provided by Quarry Falls specific plan, development agreement, and project requirements.

K-15

One of the primary goals and purposes of the proposed Project is to see if a Serra Mesa community plan amendment is desirable for the City and the Serra Mesa community based on the impacts that it would cause (or that might be avoided).

K-16

The requirement to present and analyze a reasonable range of alternatives which minimize and avoid significant impacts is a mandatory and substantive requirement of CEQA. (Kings County Farm Bureau v. City of Hanford, (1990) 222 Cal.App.3d 692, 711, 730-731; Public Resources Code §§ 21002, 21081; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), and 15091(a).) The “rule of reason” to be applied in the selection of project alternatives requires that a reasonable range of alternatives be considered *so far as the environmental aspects of a project site are concerned*. The reasonableness of the selected range of alternatives is subject to judicial review based upon the facts of the case and statutory purpose under CEQA which is “to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” (Friends of Mammoth v. Board of Supervisors, (1972) 8 Cal.3d 247, 259; Citizens of Goleta Valley v. Board of Supervisors, (1990) 52 Cal.3d 553, 563.) In reviewing the range of alternatives, the court serves a vital function in that “[e]ach case must be evaluated on its facts, which in turn must be reviewed in light of the statutory purpose.” (Citizens of Goleta Valley, *supra* at p. 566) This is especially true because the rule of reason establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. (Id.)

K-17

So that the public and decision-makers can review each of the alternatives rejected and not studied, please list (1) the alternatives raised by City but rejected and not studied or considered in the Rec-DEIR, and (2) those alternatives brought to the attention of the City (by members of the public, other agencies, planning or civic groups, or other third parties) but were rejected and not studied or considered in the Rec-DEIR. For each of the rejected and not studied alternatives, describe (1) what were the Project goals at the time the alternative was rejected, (2) what Project goals would not have been attained as a result of each rejected alternative, and (3) why the alternative was (or was not) found infeasible.

Failure to Properly Identify and Consider Reasonable Mitigation Measures

K-18

In addition to CEQA's purpose of procedurally requiring that an EIR be a full disclosure and information document, it has important substantive provisions requiring an agency to avoid and/or reduce environmental harm. (Citizens of Goleta Valley v. Bd. of Supervisors, (1990) 52 Cal.3d 553, 564 [EIR is an informational document]; Public Resources Code §21002 ["it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . ."].)

Please ensure that each mitigation measure (not only relating to traffic) is identified and information about commitment and enforcement is provided as to (1) who is responsible for constructing, (2) who is responsible for paying for it, (3) who is responsible for overseeing implementation, (4) when it is phased or planned to be implemented; and (5) the importance and priority of each mitigation measure – as compared to the other measures.

K-19

Further, the Rec-DEIR fails to describe, analyze and mitigate the potential impacts that will result to areas within the SMCP by the creation of 4-lane and 5-lane roads. While the Rec-DEIR labels all of the road widening and increased traffic flow through SMCP as "mitigation," the Rec-DEIR fails to analyze the actual and potential impacts these mitigation measures will cause to residents, homes, and people who use the areas around Murphy Canyon Road and Phyllis Road. The Rec-DEIR needs to consider and evaluate potential impacts and changes to areas in the SMCP planning area with respect to impacts to community character and road noise.

Land Use Compatibility and Consistency

K-20

I remind the City that the one of the principal purposes of the current study is to determine whether a community plan amendment for the Serra Mesa Community Plan (SMCP) is in the best interest of that that community. As directed by the city council: "Whereas, the initiation of a community plan amendment in no way confers adoption of a plan amendment and City Council is in no way committed to adopt or deny the amendment once it goes forward for approval..." (Resolution No. 304297)

K-21

From a community plan and land use consistency perspective, assuming the City decides to not proceed with the instant SMCP amendment, what is the plan and/or options to make the Mission Valley Community Plan consistent with the SMCP?

K-22

Please describe how Rec-DEIR addresses the planning principle, and/or policy of the City, that each community planning area should have definite boundaries and borders so as to maintain its own design, characteristics and attributes.

K-23

The Rec-DEIR does not adequately discuss buffers for usable and enjoyable parks from a noise, traffic, safety, and aesthetics perspectives.

Page Six
May 30, 2017
Recirculated DEIR, Project No. 265605

K-24

The Rec-DEIR incorrectly concludes that no deviations are required for the Project and thus there can be no possible land use incompatibility. (Rec-DEIR Section 5.1.4, pp. 5.1.11 to 5.1-12) This is apparent misinformation as the road grade will exceed City design road standards of acceptable grades of 7% or less. The land use compatibility section of the Rec-DEIR needs to be revised. Also, disclosure in the Rec-DEIR needs to be made if a Site Development or other permit will be required for this deviation (and perhaps other undisclosed deviations). Does any prior Quarry Falls/Civita submission or approval cover the findings necessary for an overly steep roadway configuration? If so, please provide and circulate a copy in a recirculated draft EIR so that the public and decision-maker can gauge whether a road at this location and manner is favorable over other identified access routes that may be developed or improved. Has the City calculated the additional vehicle emissions that will be generated by the overly steep climb of Franklin Ridge Road to the mesa summit in the community of Serra Mesa?

Parks and Recreation

K-25

The Rec-DEIR incorrectly states that it does not need to address parks and recreation needs for the community because the Project is not *directly* creating new population growth. (Rec-DEIR, Section 7.7.5, p. 7-12 [“the proposed project does not include a population-generating component that would in turn increase the use of existing neighborhood and regional parks”]; Section 7.9, p.7-14 [“The proposed project does not include a population-generating component that would in turn increase the use of existing neighborhood and regional parks.”].) This is incorrect for two reasons.

First, the desire to create increased road capacity for further Mission Valley residential and other development is growth-inducing and will *indirectly* create a need for additional parks and recreation for the subject Project area and communities. (CEQA Guidelines § 15126.2 (a) [“Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”])

K-26

Despite City’s refusal to consider how new roads and road widening projects are growth-inducing, it is improper for the lead agency to evaluate CEQA impacts by assuming that the environmental baseline will be some prospective and build-out of City’s plans for Mission valley and its future traffic needs. (Environmental Planning & Information Council v. County of El Dorado, (“EPIC”)(1982) 131 Cal.App.3d 350 [CEQA environmental review must address the existing level of actual physical development in the area as the baseline for its impact analysis, not the existing planned development planned therein.]) Thus, it is necessary to consider the growth-inducing impacts.

Page Seven
May 30, 2017
Recirculated DEIR, Project No. 265605

- K-27 Second, one area of the likely and intended impacts of the Project would be to bisect a park and recreation area with 2 major arterial and high-traffic arterial roads and signalized intersections. Building major roadways through the Quarry Falls/Civita parks² will substantially diminish their desirability and usability. The Rec-DEIR does not adequately address diminished park usability, instead only stating that “the linear park would be slightly bifurcated by the proposed roadway connection but would retain the same acreage.” (Rec-DEIR, Section 7.9, p.7-14) While the acreage may retain some open space qualities (or quantification), the Project’s impacts on the usability and desirability of the Quarry Falls/Civita parks needs to be fully evaluated and mitigated. (See CEQA Guidelines § 15126.2 (a) [discussion in an EIR should include “human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as . . . scenic quality, and public services.”].)
- K-28 The Rec-DEIR needs to consider and evaluate how and whether the Project impacts the desirability and usability of the currently plan and partially constructed Quarry Falls/Civita parks? Will families with children, or elders with asthma, or those who do not like parks on major roadways with noise and traffic – need or want to find other parks and recreation areas to visit and enjoy? Due to the likely, potential, and actual impacts to existing parks - that must be presumed to exist (Civita Park and Phyllis Place Park) – the Rec-DEIR needs to evaluate and consider provision of other parks and recreation areas available nearby. Related, the Rec-DEIR fails to analyze overall parks and recreational area needs of the MVCP and SMCP communities and planning areas. Are these communities park-deficient based on an area or per capita basis?
- K-29 Please address the potential impacts arising from routing 20,000 or more daily vehicle trips around and through the Civita Park and Phyllis Place Park as the parks are intended and anticipated to be used. For this purpose, please see and review the news article, “Civita Park: From Quarry to Pleasure Grounds,” Union Tribune, April 18, 2017 (<http://www.sandiegounion-tribune.com/business/growth-development/sd-fi-civitapark-20170426-story.html>)
- Traffic and Parking:
- Legally Defective Disclosure and Qualifications of Mitigation Measures*
- K-30 The traffic mitigation measures set forth in the Rec-DEIR all contain unambiguous language that they will be imposed (and when) to mitigate significant adverse impacts the extent possible. (Rec. DEIR, MM-TRAF nos. 1-19, pp. 5.2-26 through 5.2-45 [“Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, . . .”].)

² For the purposes of this comment, “Quarry Falls/Civita parks” means and includes requested and necessary Rec-DEIR analysis for both “Phyllis Place Park” and “Civita Park” (aka “Quarry Falls Park”).

Page Eight
May 30, 2017
Recirculated DEIR, Project No. 265605

K-31

However, as pointed out by other commenters, in fine print footnote (that this commenter and perhaps others similarly did not initially realize), the City improperly seeks to equivocate and outright nullify any intent or obligation to actually consider, impose, or implement a large number of the all-important traffic mitigation measures (that will ruin a part of the Serra Mesa community if not imposed and actually implemented) based on “policy” or other reasons. If identified and enumerated mitigation measures will not be implemented based on “policy” or other current or future purported reasons of “infeasibility,” please identify each one and explain: (1) is it infeasible based on policy or other reasons; (2) what makes it infeasible based on policy or other reasons; (3) are abilities to vary or except or get around “policy” or other reasons not to implement identified mitigation measures; (4) what efforts has or will City undertake to vary or except or get around “policy” or other reasons so that it can and will implement identified mitigation measures; and (5) why did City propose and set forth mitigation measures in the Rec-DEIR that it deems either “infeasible” (based on policy, availability of funding economics, or otherwise) or, as City puts it, contrary to “policy.”

Why did the Rec-DEIR include, analyze, and consider mitigation measures that it has apparently footnoted and categorized as infeasible based on policy? Why did the Rec-DEIR refuse to include, analyze, and consider project alternatives that might be categorized as infeasible based on policy?

With regards to each of the above-referenced traffic mitigation measures, please also consider and provide information in response to the following legal precept and requirement:

“In mitigating the effects of its projects, a public agency has access to all of its discretionary powers and not just the power to spend appropriations.” (City of San Diego v. Bd. of Trustees of Cal. State Univ., (2015) 61 Cal.4th 945, 959, citing Pub. Res. Code, § 21004.) District’s “discretionary powers include such actions as adopting changes to proposed projects, imposing conditions on their approval, adopting plans or ordinances to control a broad class of projects, and choosing alternative projects.” (Id., citing CEQA Guidelines, § 15002, subd. (h).)

K-32

As a result of all the ambivalence, unwillingness, or purported infeasibility, City cannot support and rely on findings that mitigation measures will (or will not) avoid or reduce significant impacts because CEQA requires that City find, based on the substantial evidence, that the mitigation measures have been “required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.” (Cal. Pub. Res. Code § 21081, subd. (a)(a); Guidelines § 15091, subds. (a)(1) &(b).) The Rec-DEIR fails to ensure and “provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures” (Cal. Pub. Res. Code § 21081.6, subd. (b)), and City has failed to set forth a clear mitigation program to ensure that all the mitigation measures will be implemented. (Cal. Pub. Res. Code § 21081.6, subd. (a).) The purpose of these requirements is to ensure that identified mitigation measures will actually be implemented as a condition of the development, and not merely adopted and ignored. (*See* Cal. Pub. Res. Code § 21002.1, subd. (b).)

Page Nine
May 30, 2017
Recirculated DEIR, Project No. 265605

VMT

Please explain the “Vehicle Miles Traveled Output and Summary” (hereafter “VMT”) and why is it being used and when was it decided to be added? It is noted that CEQA implementing regulations under SB 743 have not been adopted and currently is not the law of this state or for purposes of CEQA. What VMT policy or CEQA guideline(s) has City adopted and/or is using as a basis for Project evaluation of traffic impacts under a VMT methodology?

K-33

As a part of City’s decision to create, pay for, and have the VMT prepared, what considerations and adjustments were made for other existing and mandatory projects designed to both discourage and/or reduce vehicle trips, including but not limited to Civita/Quarry Falls project and other known projects’ direct and cumulative project impacts such as Town & Country redevelopment project, Union Tribune redevelopment project, Bob Baker Ford residential project, redevelopment of Qualcomm stadium site including results of the studies (preliminary or final) for a Chargers Stadium and Soccer City?

What considerations were made in the VMT study that the City of San Diego is promoting and approving what it calls “walkable” and “transit-oriented” communities within the regional and immediate vicinity of the proposed Project?

Is this VMT study intended and being used as a rationale to build more and wider roads, including the proposed Project to accommodate future increased automobile vehicle travel? Please describe what alternative modes of travel (non-motor vehicle) are already provided for in the Project area so that the public and decision-makers can evaluate and decide whether building more of the Project-intended motor vehicle roads and lanes is the best approach and/or result for the Project area.

What considerations were made in the VMT study for both expecting declines in overall VMT on national and local levels? (See, “The Road...Less Traveled: An Analysis of Vehicle Miles Traveled Trends in the U.S” by Robert Puentes and Adie Tomer, Metropolitan Policy Program at Brookings, December 2008. (https://www.brookings.edu/wp-content/uploads/2016/06/vehicle_miles_traveled_report.pdf)³)

K-34

Thank you for your timely consideration and responses to the above comments, concerns, and questions.

Sincerely,



Craig A. Sherman

³ See also “Vehicle Miles Traveled: Another Look at Our Evolving Behavior,” by Jill Mislinski, Advisor Perspectives, May 16, 2017 (<https://www.advisorperspectives.com/dshort/updates/2017/05/16/vehicle-miles-traveled-another-look-at-our-evolving-behavior>)

Letter K: Serra Mesa Community Council

K-1: This comment states that detailed comments are attached. Each comment is addressed below. This comment does not address the adequacy of the DEIR.

K-2: This comment states that the law office is representing the Serra Mesa Community Council for the purpose of reviewing and commenting on the proposed project and the DEIR. This comment also includes a footnote that suggests that the “underlying project has gone through numerous iterations, including project descriptions, type of CEQA document, manner and purpose and phasing, stated goals and objectives.”

As indicated in the Public Notice at the beginning of the DEIR, the Executive Summary, and Chapter 4, *History of Project Changes*, the description of the proposed project, including the project objectives, were modified from the previous PEIR. As stated in these various and appropriate locations in the DEIR, the DEIR was comprehensively and thoroughly revised to change the analysis from a programmatic analysis to a project level analysis. This change effectively created an entirely new analysis, along with more detail impacts and new/significantly revised mitigation measures. The decision to provide a project-level analysis was based on comments received during the public review process, in which the City received comments indicating that sufficient information was available to analyze the project in greater detail. The City concurred and the result was the recirculated DEIR.

Furthermore, the City, as Lead Agency under CEQA, has the discretion to set forth project objectives that reflect the underlying purpose of the proposed project and also has the ability to revise project objectives if the DEIR is recirculated for public review. There is no requirement, guideline, or other regulation under CEQA that stipulates that a project cannot change objectives or the description of the proposed project as long as it is recirculated for public review (see Section 15088.5 of the CEQA Guidelines). No revisions to the FEIR are warranted as a result of this comment.

K-3: This comment alleges that the DEIR does not identify what changes were made between the previously circulated PEIR (April 18, 2016) and the most recently recirculated version of the DEIR (March 29, 2017), and that it “violates” Section 15088(f)(1),(g) of the CEQA Guidelines.

Section 15088.5(g) of the CEQA Guidelines states the following: “When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated DEIR.” The DEIR is fully compliant with this requirement. A summary of the revisions made to the previously circulated DEIR was provided in the Public Notice of Availability for Recirculation of an EIR and also within Chapter 3, *Project Description*: “After considering the comments received during the public review period, the City decided to analyze the road connection with a project-level analysis. The additional description and analysis warranted revisions to the draft PEIR, which in turn led the City to decide to replace the PEIR with a project-level EIR and recirculate for a second public review.” As the scope of analysis changed from a programmatic level (e.g., not including any specific roadway design, construction details) to a project level of analysis, the entire DEIR necessarily warranted revisions throughout to reflect that detail. Furthermore, the DEIR was in an entirely new structure and format (e.g., font, numbering, figures), all of which indicates that the entirety of the DEIR had been revised, consistent with modifying an analysis from program to project level.

In addition, Section 15088.5(f) of the CEQA Guidelines states: “Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR.”

Section 15088.5(f)(1) is the first of these two referenced approaches, which the City follows within the DEIR, as indicated within the public notices and Chapters 1 and 3, Introduction and Project Description. It states: “When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the FEIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.”

The DEIR was substantially revised, as clearly stated both within the Public Notice and DEIR, and the entire document was recirculated. If only portions of the DEIR or the appendices were changed or revised, the City would have only recirculated those portions. As noted in response to K-2, the decision to provide a project-level analysis was based on comments received during the public review process, in which the City received comments indicating that sufficient information was available to analyze the project in greater detail. The City concurred and the result was the recirculated DEIR. Further clarification has been added to Chapter 1, *Introduction*, of the FEIR to be responsive to the commenter. However, the clarifying information does not change the fact that the Public Notice and DEIR both indicated in appropriate locations that the DEIR had undergone substantial revisions in the form of being modified from a high level program level analysis to a detailed project level analysis. This information does not represent substantial new information or increase the severity of the impacts previously identified within the DEIR.

K-4: The commenter notes that the previously circulated PEIR received a significant number of comments. Please see the response to comment K-3 and specifically where Section 15088.5(f)(1) of the CEQA Guidelines is discussed. No changes to the FEIR are required.

K-5: This comment states that “CEQA requires candid disclosures and is not designed or intended to be a guessing game or fishing expedition,” which is an excerpt from a CEQA legal case (*Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.*, (1988) 47 Cal.3d 376, 394).

Please see the responses to K-2, K-3, and K-4. As discussed in those responses, the City reviewed previous comments received on the PEIR, determined that sufficient information was available to prepare a detailed project level analysis, and, in an effort to be responsive to comments received, substantially revised the entire DEIR to include the project-level detail and analysis contained within the recirculated DEIR. Moreover, the Public Notice and appropriate sections throughout the DEIR explained that the DEIR had undergone substantial revisions as a result of being converted from a program level to a project level analysis.

The commenter also requests that the City provide a list of material changes to the project design and/or study as well as a strike-out version of the DEIR so that interested parties “know what to focus on...such that meaningful comment can be provided.” To provide a strikeout version of the originally circulated DEIR or a more detailed summary that contains what would amount to a long

list of changes between versions would provide no additional meaningful information to the reader and decision-maker other than to support the statement already in the Public Notice and DEIR that substantial revisions had occurred since the previously circulated draft. Moreover, in practical terms, if the document was provided in strikeout/underline format, as suggested, nearly the entire document would be shown as strikeout/underline. The result would be a recirculated DEIR of limited informational value to the majority of readers because of its near illegible condition. In addition, because the entire DEIR was completely overhauled, a summary statement indicating that the DEIR was converted from a high level program analysis to a detailed project level analysis is a sufficient summary because it accurately conveys to the reader and decision-maker the significant changes that occurred since the previous review. Finally, the public review was 60 days, which is more than 15 days beyond the 45 days required by CEQA and which would provide more time than required by State law for the public to review the recirculated DEIR in its entirety.

The comment also suggests that the purpose of an EIR is to not inform decision makers of the environmental effects of projects they have already approved (in reference to the previously mentioned Laurel Heights case). However, this reference is not relevant. The proposed project has not been previously approved and therefore is not informing the decision makers of the environmental effects of projects already approved. No changes to the FEIR are required as a result of this comment.

K-6: This comment is a continuation of comment K-5. Please see the responses to comments K-2, K-3, K-4, and K-5.

K-7: The comment alleges that the City is required to respond to comments made on both the previously circulated PEIR and the recirculated DEIR as a result of not explaining what is new and different in the recirculated DEIR. The comment further states that the City is required to both explain whether or not the original comments were reviewed and addressed (including how and why), and whether the comments remain applicable to the recirculated DEIR, and whether and how they have been addressed.

The commenter lacks authority for this contention and is incorrect. Please see the responses to comments K-2, K-3, K-4, and K-5. No revisions to the FEIR are warranted as a result of this comment.

K-8: This comment questions if the original and recirculated appendices to the DEIR have been changed. It also requests that if any changes or updates, or new or significant information was added to prior appendices to the DEIR to identify each and explain how they were changed and why.

This comment is similar to K-5, K-6, and K-7. Please see the responses to K-5, K-6, and K-7. For the reasons explained therein, there is no requirement under CEQA to identify the changes to each appendix, explain how they were changed, or why beyond the explanation provided in the Notice/Introduction/Project Description, Appendix H was added to the DEIR and was therefore not included within the previously circulated PEIR. As detailed in Section 5.2.1 of the DEIR, Appendix H includes the methodology and results of the vehicle miles traveled (VMT) analyses conducted for the proposed project, which include both a study area VMT analysis and a region-wide (i.e., San Diego County) VMT analysis. The appendices, along with the DEIR, were circulated for a 60-day public review, which is more time than required under state law and is sufficient to review the DEIR and appendices that support the analysis contained therein.

In addition, Appendix C was modified to include an updated traffic impact study, as stated at the very beginning of Section 5.2, *Transportation and Circulation*, of the DEIR. Specifically, this section

states: “The following discussion summarizes the Serra Mesa CPA Street Connection Traffic Technical Report (traffic study) prepared by Chen Ryan Associates in September 2016, included as Appendix C to this DEIR. The traffic study utilized data from the previous traffic study, Franklin Ridge Road Connection Traffic Impact Study, which was prepared by KOA Corporation in January 2015. The previous traffic study prepared by KOA Corporation is included as an appendix to the traffic study.” Therefore, it was clear within the DEIR that this appendix had been updated, as the Chen Ryan Associates report was prepared in September 2016, following the close of the previously circulated PEIR’s public review period (which ended in July 2016). No revisions to the FEIR are warranted as a result of this comment.

K-9: This comment is similar to the previous comment K-7. This comment states that the commenter requests responses to comments on the previously circulated PEIR and that the letter incorporates each of the comments previously submitted on the previously circulated PEIR that were provided by his office on the previous version of the EIR as well as the entire universe of comments provided on the previous version of the EIR by other commenters.

Please see responses to comments K-3, K-4, K-5, K-7, and K-8. As previously stated, Section 15088.5 of the CEQA Guidelines contains two clear options for Lead Agencies when recirculating a DEIR. The City complied with Section 15088.5(f)(1) when it recirculated the entire DEIR for a 60-day review period. As the City has complied with this requirement, responses to comments on the previously circulated PEIR are not required by law, are not eligible to be incorporated by reference because they pertain to a previous version of the EIR, and will not be provided.

This comment also states that the City is required to address all comments received and references a portion of the CEQA Guidelines. The responses to comments on the DEIR respond to all pertinent comments on significant environmental issues. The comments on the previously circulated PEIR may no longer be specifically relevant to the recirculated DEIR, as the entire scope of the analysis of the proposed project was changed to be project-level. This also resulted in different significant impacts and mitigation measures being identified. CEQA allows agencies to call for new comments and lawfully set aside old comments under such conditions. The City has updated the recirculated DEIR to be responsive to several of the past comments, so there is no additional need to respond to outdated comments. No revisions to the FEIR are warranted as a result of this comment.

K-10: A portion of this comment is similar to K-9. Please see the response to K-9. The remainder of the comment is an introductory comment stating that additional comments are provided.

K-11: This comment asks for itemized edits made to the goals, purposes, and definition of the project. For the reasons explained in responses to comments K-5, K-6, and K-7, an itemized list of changes is not required or warranted.

The objectives were modified slightly to better reflect and clarify the basic objectives of the project. The changes to the objectives included a greater focus on multi-modal mobility and also reduced redundancy among the objectives. However, no substantial revisions occurred to the objectives such that public disclosure and informed decision making would be adversely affected.

Moreover, nothing within CEQA or its implementing guidelines precludes modification of project objectives (or the project description) prior to recirculating a DEIR. Indeed, it is within the spirit of CEQA to modify a project when comments received on it during the public review are compelling and require a lead agency to consider modifications to be responsive to well-reasoned comments.

As noted on page 1-3 and as further clarified within the FEIR, the previous program-level analysis was completely overhauled and a project-level analysis replaced it. Changes to the previous program EIR were comprehensive and were made in response to the public comments received during public review for the program EIR; as such, the CEQA objectives and the project description as a whole was updated to better reflect the proposed project. The proposed project is clearly defined throughout Chapter 3, *Project Description*. Please see response to K-5, which is a comment similar to this one. No changes to the FEIR are warranted as a result of this comment.

K-12: This comment states that the DEIR has redefined the project description, purpose, and goals in a manner that has impaired the ability of the City to select and consider a reasonable range of project alternatives. The commenter does not explain how changes to objectives might create any deficiency in alternatives analyses.

Please see page 3-1 of the DEIR, which lists the project objectives. These project objectives include the underlying purpose of the proposed project. The objectives are consistent with the issues posed for resolution by the City Council, and include a range of basic project objectives. The project objectives allow for consideration of a range of reasonable alternatives to the project. The commenter's opinion that the project description and objectives contained within the recirculated DEIR have impaired the ability of the City to select and consider a reasonable range of alternatives is without foundation and merit.

The comment also alleges that the DEIR does not include pertinent information to provide the City Council with the information that they need for making a decision on the issues that were listed in the resolution. The four questions needing resolution as set forth by the City Council within the amendment (Staff Recommendation Number 6) to the Quarry Falls project approval are detailed on page 3-2 of Chapter 3, *Project Description*, of the DEIR. These four questions formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*. Each of these questions are answered within relevant sections of the DEIR. The first and second questions are analyzed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR (see Section 7.7 for fire-rescue and police services; see Section 7.4 for emergency evacuation). The third question is analyzed in Chapter 9, Alternatives, as "Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative" (see Section 9.5.2). The fourth question is analyzed within Section 5.2, *Transportation and Circulation*, of the DEIR (see Section 5.2.8).

This comment does not specifically raise an issue with the project description or alternatives section of the DEIR.

K-13: The comment states that the refusal to consider and reject "facially valid" impact reducing alternatives or mitigation is both a procedural and substantive violation of CEQA. The comment states that the City was given at least two feasible alternatives – (1) a Mission Valley community plan amendment consistency option, and (2) an alternative that improves the existing road network (including Mission Center Road and Mission Village Drive). It states that the City never properly analyzed or considered these possible impact-reducing solutions as alternatives.

The City does not agree with the allegations presented within this comment. As detailed within Section 9.2 of the DEIR (emphasis added): "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic

project objectives, are not feasible, or do not avoid or substantially lessen any significant environmental effects (State CEQA Guidelines, Section 15126.6(c)).”

Despite suggestions to the contrary, the alternatives suggested by the commenter were each considered within the DEIR. The Mission Valley Community Plan Amendment Consistency Alternative was considered but ultimately rejected, as detailed in Section 9.4.1.2: “The No Build/Remove from Mission Valley Community Plan Alternative would not include the construction and operation of the roadway connecting Phyllis Place to Franklin Ridge Road/Via Alta, and would remove language regarding the potential connection from the Mission Valley Community Plan. This alternative was rejected from further consideration because it would not meet any of the project objectives.” The reasons the alternative would not meet any of the project objectives are provided within Section 9.4.1.2 of the DEIR. As further detailed within that section: “Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City’s Climate Action Plan and Bicycle Master Plan include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended.”

The second alternative suggested by the commenter is equivalent to the No Project Alternative. As detailed within Section 9.5.1.2 of the DEIR: “As previously detailed in Chapter 3, *Project Description*, the Quarry Falls developer is adhering to an existing Mitigation Monitoring and Reporting Program (MMRP) related to roadway capacity impacts. Therefore, if the proposed project were not to be implemented, the Quarry Falls developer would still be required to implement roadway capacity mitigation measures in conjunction with buildout of the project. Where applicable, the existing mitigation measures required by the Quarry Falls MMRP are detailed below.” The Quarry Falls MMRP includes improvements to the existing roadway network, such as Mission Center Road and Mission Village Drive.

The comment does not provide information supporting an alternative that would meet most of the basic objectives, be feasible, and avoid or substantially lessen a significant environmental effect in a manner required by CEQA. As the DEIR adequately analyzed a range of reasonable alternatives, no revisions to the FEIR are warranted.

K-14: This comment expresses the opinion that the City does not set forth and consider a reasonable range of project alternatives. It states that the City considered one alternative for bicycle, pedestrian, and emergency access and that it is essentially the same as the no project alternative because current access for those modes of travel are already available and are being provided by Quarry Falls specific plan, development agreement, and project requirements.

The City does not agree with the commenter’s opinion. Section 9.4.1 of the DEIR details the alternatives considered but ultimately rejected for further analysis and the reasoning why they were rejected.

The DEIR fully analyzes two alternatives: the No Project Alternative and the Bicycle, Pedestrian, and Emergency Access Only Alternative. The City does not agree with the commenter’s opinion that the Bicycle, Pedestrian, and Emergency Access Only Alternative is the same as the No Project Alternative. Although bicycle, pedestrian, and emergency access is provided from Kaplan Drive, it does not provide the same direct access for either emergency responders or pedestrians/cyclists coming from the north or east. For example, if an emergency responder is attempting to respond to a

call within the northern portion of the Quarry Falls site and is leaving from the San Diego Fire-Rescue Department Fire Station 28, located at 3880 Kearny Villa Road (see Section 2.4.1), the access from the proposed alternative would be quicker, as the access point is closer to I-805 than the current emergency access entry at Kaplan Drive. In addition, the pedestrian/cyclist access point from the proposed alternative would be closer to Serra Mesa, as pedestrians/cyclists currently have to travel along Abbotshill Road and Ainsley Road, then through Kaplan Drive and existing residences, before reaching Via Alta to travel further southward (or vice versa). Overall, the DEIR adequately analyzes alternatives to the proposed project in compliance with CEQA. No revisions to the FEIR are warranted as a result of this comment.

K-15: This comment states that one of the primary goals and purposes of the proposed project is to see if a Serra Mesa community plan amendment is desirable for the City and the Serra Mesa community based on the impacts that it would cause. This comment states the opinion of the commenter as to what the purpose of the proposed project is. The objectives of the proposed project are set forth in Section 3.1 of the DEIR. This comment does not specifically raise an issue with the analysis conducted within the DEIR.

K-16: This comment states that the requirement to present and analyze a reasonable range of alternatives which minimize and avoid significant impacts is a mandatory and substantive requirement of CEQA. The comment also quotes excerpts from case law and discusses the “rule of reason” that is typically applied to the selection of project alternatives. This comment does not specifically raise an issue with the analysis conducted within the DEIR.

K-17: This comment requests that the City list the alternatives raised by the City but rejected and not studied or considered in the DEIR, and to list those alternatives brought to the attention of the City (by members of the public, other agencies, planning or civic groups, or other third parties) but were rejected and not studied or considered in the DEIR. It also requests that for each of the rejected and not studied alternatives that the City describe what were the Project goals at the time the alternative was rejected, what Project goals would not have been attained as a result of each rejected alternative, and why the alternative was (or was not) found infeasible.

Please see the responses to comments K-7, K-13, and K-14. Section 9.4.1 of the DEIR details the alternatives considered but ultimately rejected for further analysis and the reasoning for why they were rejected. There is no requirement under CEQA to state the previous objectives of a project when the DEIR is substantially revised and recirculated in its entirety. The DEIR adequately analyzes the impacts of the proposed project, which required clarifications to project objectives as determined by the City. Previously suggested alternatives on the previously circulated PEIR may not have relevance to the current iteration of the proposed project, and, pursuant to CEQA, the public was requested to provide new comments on the recirculated DEIR. No revisions to the FEIR are warranted as a result of this comment.

K-18: This comment states that CEQA has important substantive provisions requiring an agency to avoid and/or reduce environmental harm. It also requests to ensure that each mitigation measure provides (1) who is responsible for constructing, (2) who is responsible for paying for it, (3) who is responsible for overseeing implementation, (4) when it is phased or planned to be implemented; and (5) the importance and priority of each mitigation measure – as compared to the other measures.

Please note that the project Mitigation Monitoring and Reporting Program (MMRP) contains all required components for each mitigation measure. The City would be responsible, as Lead Agency

under CEQA, for monitoring that all mitigation measures are implemented in accordance with the trigger to implement the mitigation measure and each mitigation measure within the MMRP includes the timing and responsibility for when the mitigation measure shall occur.

In addition, please refer to Table ES-1 and mitigation measures set forth throughout Chapter 5, *Environmental Analysis*, of the DEIR. With regards to the fifth comment raised, there is no requirement under CEQA to state the importance or priority of each mitigation measure as compared to other measures. Each mitigation measure is set forth to reduce a significant impact on the environment to the extent feasible within each issue area (e.g., traffic, biological resources). The basic requirement under CEQA, as previously stated, is to minimize a significant impact on the environment to the extent that is feasible (see Section 15126.4 of the CEQA Guidelines). As detailed in Section 1.1 of the DEIR, in instances where significant impacts cannot be avoided or mitigated, the proposed project may nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts. No revisions to the FEIR are warranted as a result of this comment.

K-19: This comment states that the DEIR does not describe, analyze, and mitigate the potential impacts that will result to areas within the Serra Mesa Community Plan area by the creation of four- and five-lane roads. As detailed in Section 15125.4(a)(1)(d), if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.

The FEIR has been updated with this clarifying information. However, as analyzed, no new or more severe significant impacts would occur and no new mitigation is required. Please refer to Section 5.2, *Transportation and Circulation*, for the clarification to the analysis.

K-20: This comment states that one of the principal purposes of the current study is to determine whether a community plan amendment for the Serra Mesa Community Plan is in the best interest of that community and restates a portion of the City Council Resolution Number 304297. As previously detailed, the project objectives are detailed within Section 3.1 of the DEIR. In addition, please note that the City Council has not approved the project at this time and will consider whether or not the benefits of the project outweigh the environmental effects, as documented in the Statement of Overriding Considerations. This comment is the opinion of the proposed commenter and does not raise an issue with the environmental analysis within the DEIR.

K-21: This comment asks that if the proposed project is not approved how the Mission Valley Community Plan would be made consistent with the Serra Mesa Community Plan. The DEIR evaluates the environmental impacts of the proposed project; there is no requirement to otherwise reconcile an inconsistency between community plans. The No Project Alternative (see Section 9.5.1 of the DEIR) details the environmental impacts of what would occur if the project were not to be approved. No revisions to the FEIR are warranted as a result of this comment.

K-22: This comment asks how the DEIR addresses the planning principle and/or policy of the City that each community planning area should have definite boundaries and borders so as to maintain its own design, characteristics, and attributes.

It is not clear as to which planning principle or policy the commenter is specifically referring to; however, the City does generally concur that each community plan area has its own design, characteristics, and attributes. The proposed project would not significantly alter the design,

characteristics, or attributes of either the Serra Mesa or Mission Valley community plan area. The proposed project is a roadway connection that would provide interconnectivity between the two community plan areas, as further detailed in the land use consistency analysis (see Tables 5.1-1 and 5.1-2 of the DEIR). Connecting two community plan areas by a roadway does not change the boundaries and borders of community plans, but does provide increased mobility and access between community plans. No revisions to the FEIR are warranted as a result of this comment.

K-23: This comment expresses the opinion that the DEIR does not adequately discuss buffers for usable and enjoyable parks from a noise, traffic, safety, and aesthetics perspectives.

The comment does not specifically state which park the commenter is referring to, nor does it specifically state which regulations require buffers for parks. However, the DEIR details the proposed project's compatibility with the proposed Phyllis Place Park and the Quarry Falls Park. As detailed in Section 5.1.4.1 of the DEIR: "Although the roadway would require a public right-of-way area that would interrupt the park, the park is a linear design that would still remain connected to the overall system using a pedestrian crossing at the intersection. The proposed project would divide the park by placing a roadway in between the two portions of it; however, this would not represent a significant impact on the environment, as the proposed project would not result in hazards to pedestrians/park users. The roadway itself would be designed in accordance with applicable City regulations, including the Street Design Manual (2002) and the intersection at Phyllis Place would be signalized and would include a signalized pedestrian crossing. Therefore, impacts would be less than significant." It is acknowledged therein that the proposed project would divide the park; however, this would not represent a significant impact related to the baseline aesthetic condition. The park has not yet been constructed. Although the continuity of the park would be interrupted, this would not represent a significant impact related to aesthetics.

The noise analysis within the DEIR analyzed potential noise impacts to uses that existed on the ground at the time of the baseline condition (2015). However, as a result of comments received during public review and good faith, the FEIR contains clarifying information regarding the potential noise impacts from the project on planned parks, including Phyllis Place Park. As clarified in Section 5.4, *Noise*, of the FEIR, potential noise impacts related to planned parks were analyzed; no significant impact was identified.

Traffic impacts associated with the roadway are identified in Section 5.2, *Transportation and Circulation*. No revisions to the FEIR are warranted as a result of this comment.

K-24: This comment alleges that the land use compatibility section of the DEIR needs to be revised because the road grade will exceed City design road standards of acceptable grades of 7 percent or less. It also states that the DEIR needs to disclose if a Site Development Permit or other permit will be required for this deviation.

The proposed roadway has been conceptually designed to be consistent with the City's Street Design Manual. If a deviation from the City's Street Design Manual is required, it would not require another permit or discretionary decision. The City's Traffic Engineering Department reviews the final design of the roadway for compliance with the City's Street Design Manual and other final engineering issues. Furthermore, the City's Significance Determination Thresholds and the DEIR (see Section 5.1.4) state: Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment? As stated within Section 5.1.4.1 of the DEIR: "A deviation or variance from development regulations is typically sought by a project that involves the development of buildings that would not meet certain development regulations, such as a

deviation for buildings to be taller in height than what is allowed. As the proposed project involves a roadway, the proposed project would not require any deviations or variances from building development regulations. As the project contains steep slopes, it is subject to the Environmentally Sensitive Lands (ESL) Regulations. As previously detailed in Chapter 3, *Project Description*, the ESL Regulations require processing of a Site Development Permit (SDP) concurrently with the project's actions. The SDP issued in conjunction with the Quarry Falls project covers the parkland within the Quarry Falls Specific Plan area. Under the SDP, potential environmental impacts on the ESL have already been accounted for." Therefore, no revisions to the FEIR are warranted as a result of this comment.

K-25: This comment alleges that the DEIR incorrectly states that it does not need to address parks and recreation needs for the community because the project is not directly creating new population growth. It also states that the desire to create increased road capacity for further Mission Valley residential and other development is growth-inducing and will indirectly create a need for additional parks and recreation for the subject project area and communities.

The City does not agree with the reasoning expressed in this comment. None of the objectives of the proposed project express a desire to create increased road capacity for Mission Valley development. Moreover, the road would serve existing and approved development in the area. It is speculative to conclude that because the roadway connection would be built, people that would not otherwise have resided in Mission Valley or Serra Mesa would now reside in one of these communities. Even more importantly, the DEIR adequately analyzes the potential for both direct and indirect growth inducement. Section 8.3.1 of the DEIR analyzes direct population growth and states that "no new residential units or other structures that would generate population would result from implementing the proposed project. Therefore, the proposed project would not directly result in population growth."

As detailed in Section 8.3.2 of the DEIR: "...the proposed project would result in redistribution of area traffic patterns; however, no new traffic would be generated as a result of the project. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans. The proposed project would not be expected to alter the density or growth rate of the adjacent Quarry Falls development because this project has an approved specific plan that specifies the residential densities within the site. Therefore, the proposed project would not substantially alter the planned location, distribution, density, or growth rate of the population of an area."

Concerning the indirect growth-inducing effects related to the extension of infrastructure, as detailed in Section 8.3.2 of the DEIR: "...the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The proposed roadway would accommodate existing and planned near-term growth within the vicinity of the project site. Furthermore, it would provide additional options for motorists, pedestrians, and cyclists to travel north and south between the Serra Mesa and Mission Valley communities. Because the site is located within a community that is in the process of being nearly built out, all major public services and utilities currently service the project site. The proposed project would require storm drains or related stormwater management features; however, these would be sized to treat only the stormwater associated with the project itself. It would not provide surrounding development with stormwater treatment. Furthermore, no new infrastructure facilities for water supply or wastewater

treatment would be required to accommodate the project. The proposed project would not result in the extension of major infrastructure facilities into areas that would induce population growth or reduce barriers to additional growth.” The comment does not provide facts supporting the opinion such that the City could evaluate it further. Therefore, as detailed above, the proposed project would not result in direct or indirect growth inducing effects and would not require the need for additional parks. No revisions to the FEIR are warranted as a result of this comment.

K-26: This comment suggests that the EIR did not address growth inducing impacts and suggests that it is improper for the lead agency to evaluate environmental impacts pursuant to CEQA by assuming that the environmental baseline will be some prospective buildout of City’s plans for Mission Valley and its future traffic needs. Please see the response to comment K-25; the EIR did address potential growth-inducing impacts. In addition, the baseline for the proposed project is adequately detailed within the introduction of Chapter 2, *Environmental Setting* (for example, see pages 2-1 and 2-2) and further detailed for each issue area within the respective resource section of Chapter 5, Environmental Impact Analysis. For instance, please refer to Section 5.2, *Transportation and Circulation*, for the explanation and discussion of the traffic impact study baseline. No revisions to the FEIR are warranted as a result of this comment.

K-27: This comment expresses the opinion that building the proposed road connection through the planned Civita parks will substantially diminish their desirability and usability. It also states that while the acreage may retain some open space qualities (or quantification), the project’s impacts on the usability and desirability of the parks needs to be fully evaluated and mitigated, and references Section 15126.2(a) of the CEQA Guidelines.

The City does not agree with this comment and believes it is a misinterpretation of CEQA. Section 15126.2(a) of the CEQA Guidelines does not state that significant environmental impacts of a proposed project constitute the “desirability and usability” of the land or a park. The full excerpt states: “Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services.”

The environmental analysis is to focus on physical impacts on the environment as required by CEQA and the City’s Significance Determination Thresholds that were utilized within the DEIR. For example, as detailed within Section 7.9 of the DEIR, impacts on recreational facilities would occur if the project were to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The analysis within Section 7.9 then states: “Under project implementation, the linear park would be bifurcated by the proposed roadway connection but would retain the same acreage. In addition, the proposed roadway would be adjacent to a planned dog park that would be located to the west of the roadway. The proposed project would slightly increase access to and availability of parks within the immediate vicinity of the roadway connection. However, access to these parks would also be available if the project was not implemented. The parks within the vicinity are generally smaller, neighborhood-serving recreational facilities that are not expected to attract a significant amount of visitors, with or without the project. Implementation of the proposed roadway would therefore not significantly deteriorate parks or other recreational facilities. The proposed

project does not include a population-generating component that would in turn increase the use of existing neighborhood and regional parks. The proposed project would include bike lanes on either side of the roadway as well as pedestrian pathways, which could be used for recreational purposes. These facilities are within the project site evaluated throughout this DEIR. Therefore, impacts related to parks and recreational facilities would be less than significant.”

Therefore, the DEIR adequately analyzed the potential impacts associated with recreation, and no impacts related to the substantial physical deterioration of the recreational facility would occur or be accelerated. No revisions to the FEIR are warranted as a result of this comment.

K-28: This comment states that the DEIR should consider and evaluate how and whether the Project impacts the desirability and usability of the currently plan and partially constructed Quarry Falls/Civita parks. This comment also states that families with children or elders with asthma who do not like parks on major roadways with noise and traffic would need or want to find other parks and recreation areas to visit as a result of the proposed project.

Please see the response to Comment K-27. The potential environmental impacts on sensitive receptors, with regards to air quality and noise, are adequately analyzed and disclosed within Sections 5.3, *Air Quality*, and 5.4, *Noise*. No significant impacts were identified. As previously detailed, there is no requirement under CEQA to analyze the desirability or usability of a proposed park. The DEIR adequately analyzes potential physical impacts to the proposed parks, as detailed in the response to Comment K-27. No revisions to the FEIR are warranted as a result of this comment.

K-29: The comment asks to address the potential impacts arising from roadway traffic adjacent to proposed parkland. Please see the response to Comments K-23, K-27, and K-28.

K-30: This comment alleges that the traffic mitigation measures set forth within the DEIR contain unambiguous language that they will be imposed.

CEQA requires a lead agency to identify and analyze in an EIR feasible mitigation measures within its regulatory authority that would substantially lessen or avoid any significant effect the project would have on the environment. CEQA then allows the decision-maker to determine whether the identified mitigation measure is feasible, taking into consideration specific economic, legal, social, technological or other considerations. During analysis of the mitigation measures that were identified for significant project impacts, it became evident that certain mitigation measures might conflict with certain policy goals of the City, and that a decision-maker might ultimately deem the mitigation measures infeasible under the standards set forth in CEQA. Due to the uncertainty of being able to implement those certain mitigation measures, the analysis takes a conservative approach in not assuming that they could be implemented. The decision-maker will have ultimate authority on this matter but the analysis presents a conservative scenario in order to most fully capture each potential significant impact. Table ES-1 within the Executive Summary of the DEIR includes all mitigation measures that were identified to reduce impacts to less than significant, while Section 5.2, *Transportation and Circulation*, also details each mitigation measure. Within both of these sections, it is identified that some of the mitigation measures may not be able to be implemented due to the countervailing considerations that were described, and that the analysis within the DEIR does not assume them to be implemented and considers the impact to be significant and unavoidable.

The DEIR does not determine the feasibility of the mitigation measure or make the ultimate determination if it will be implemented; that is the responsibility of the certifying body of the Lead

Agency and occurs within the Findings of Fact (Findings) (see, for example, Section 15091 of the CEQA Guidelines). The Findings are included as part of the FEIR and determine/disclose the mitigation measures that will be implemented and those that were determined to be infeasible. No revisions to the FEIR are warranted as a result of this comment.

K-31: This comment is similar to comment K-30; please see the response to that comment. The City does not agree with the allegation that the City seeks to “equivocate or outright nullify any intent or obligation to actually consider, impose, or implement a large number of the all-important traffic mitigation measures.” The City, as Lead Agency, balances the technical, economical, and social factors when deciding to carry out the proposed project and the numerous mitigation measures associated with the proposed project. If the City determines that, for example, preserving existing bike lanes is more important than vehicle delay impacts, it is within the City’s purview and discretion as Lead Agency to determine that within the Findings and Statement of Overriding Considerations (SOC), and ultimately at the City Council hearing.

K-32: This comment is similar to comment K-30; please see the response to that comment. The City does not agree that the City has not set forth a clear mitigation program. Please see the Findings, SOC, and Mitigation, Monitoring, and Reporting Program (MMRP) that are included as part of the FEIR.

K-33: This comment generally expresses concern regarding the Vehicle Miles Traveled (VMT) analysis conducted as part of the proposed project. Please see the responses to comments G-87 (How VMT analysis was conducted) and G-90 (SB-743).

K-34: This comment is a closing statement that thanks the City for the consideration and the responses to the comments and questions contained within the letter.

Letter L

From: [Julie Corrales](#)
To: [PLN PlanningCEQA](#)
Cc: [John LaRaia](#)
Subject: PROJ. #265605 - Serra Mesa Community Plan Amendment Roadway Connection Project
Date: Wednesday, May 31, 2017 5:41:14 PM
Attachments: [2017.05.30 Recirculated EIR Comments.pdf](#)

Hello,

L-1

Please see the attached comment letter re: the Serra Mesa Community Plan Amendment Roadway Connection Project Recirculated EIR. Hard copy to follow.

Thank you,

Julie Corrales

Administrative Assistant, Development

H.G. Fenton Company

7577 Mission Valley Road

San Diego, CA 92108

Office: 619.400.0174 | Cell: 619.381.3406

www.hgfenton.com



TRUST, SERVICE AND INNOVATION SINCE 1906

May 30, 2017

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, Suite 1200, MS 413
San Diego, CA 92101
E-mail: PlanningCEQA@sandiego.gov

SUBJECT: SERRA MESA COMMUNITY PLAN AMENDMENT STREET CONNECTION
RECIRCULATED ENVIRONMENTAL IMPACT REPORT,
PROJECT NO. 265605; SCH NO. 2012011048

Dear Ms. Morrison:

L-2

As owner of both residential and commercial office/industrial properties within the Mission Valley community, *H.G. Fenton Company* is extremely interested in the welfare of our residents, those who lease our office and industrial space, and associated employees and visitors. Ensuring that our properties maintain their high quality living and working environments is key not only to our success but also to the health of San Diego's thriving communities. The roadway connection between Friars Road and Phyllis Place/I-805 is an important component in the efficiency of the overall transportation network and will benefit the both the immediate communities in its vicinity and the region.

L-3

We strongly support the completion of this long-planned circulation element road that will link Mission Valley and Serra Mesa for the following reasons:

1. **Improved Traffic Flow** – A complete road network is necessary to serve travel demands directly and to reduce out-of-direction travel. The road connection through Mission Valley to Phyllis Place/I-805 has been anticipated since the adoption of the Mission Valley Community Plan in 1985. It is a vital component of our future planned circulation system – for Mission Valley and Serra Mesa, as well as for travelers throughout our city.
2. **Reduced Vehicle Miles Travelled** – The roadway connection is critical to reducing the amount of vehicle miles traveled (VMT), which is a key measure related to congestion and greenhouse gas emissions. It will result in a 1.8 percent VMT reduction – or 13,207 fewer VMT - within the study area in Year 2035.
3. **Essential Local and Regional Roadway Connection** – The roadway connection is a part of the SANDAG Regional Transportation Plan, as shown by the regional model. It is therefore inherently included in the majority of transportation planning completed over the last several decades. Developments that have come forward for approvals since adoption of the Mission Valley Community Plan have depended on this essential road connection; and it is an assumed component

L-3
cont.

for build-out of the Mission Valley community, which in part ensures that additional traffic impacts are not encountered. Without this roadway connection, any number of projects that have been approved in the last 32 years may have unforeseen traffic impacts that have no mechanism to be mitigated or remedied.

Providing a connection from Mission Valley to the Phyllis Place/I-805 interchange provides an important relief valve for other major interchanges and congested freeways, making efficient use of an under-utilized interchange and substantially reducing traffic on other facilities, such as I-8, that currently suffer from unnecessarily diverted traffic which causes more congestion.

4. **Improved Emergency Access** – The Serra Mesa neighborhood located west of I-805 has one point of ingress/egress: Phyllis Place/Murray Ridge Road. In the event of a catastrophic emergency, such as a wildfire, all 200+ homes will need to evacuate at this single point. Should an emergency occur during peak commute times, evacuations would face greater challenges due to congested freeway conditions. Even for a smaller-scale emergency, such as an ambulance responding to a 911 call, this one access point could cause a serious risk to life if roadway conditions are not free-flowing. A secondary access point to I-805 at Phyllis Place allows for expeditious evacuation and quicker response times for emergency vehicles accessing the neighborhood from Mission Valley, as well as entering through Serra Mesa.
5. **Improved Connectivity** – The southwest portion of Serra Mesa is relatively isolated and disconnected from neighboring Mission Valley to the south and the communities beyond. Residents, visitors, and employees who seek to access Mission Valley and the communities south of Mission Valley have to either get on the regional I-805 freeway, or circuitously travel down into Mission Valley via Murray Ridge Road and Mission Center Road. The proposed road connection ensures greater connectivity between adjoining communities and the wealth of the regional-serving amenities in Mission Valley and beyond.
6. **Improved/Expanded Access for Transit** – The improved connectivity serves to provide greater access to existing transit, including light rail and bus service. Providing a roadway connection between Friars Road and Phyllis Place/I-805 facilitates expanded and more efficient bus service, serving our communities and connecting to places of employment, universities, shopping, sporting events, entertainment, etc.
7. **Efficient Design and Appropriate Use of the Planned Street Network** – Development within the Civita project has been designed such that, with few exceptions, residential buildings are served by roadways and drive-courts that connect to Via Alta Way and Franklin Ridge Road. There are no homes that have driveway access directly on to these roads. Whereas in the Serra Mesa neighborhoods northeast of Civita, more than 22 homes take direct access onto heavily travelled Murray Ridge Road, affecting the ability for these residents to easily and safely exit their homes. These homes not only front one of San Diego's busiest residential streets, but they rely on on-street parking on Murray Ridge Road for visitors and guests.

L-3
cont.

The proposed roadway connection has been anticipated by the Specific Plan for Civita, and development has been designed accordingly within Civita in a manner that promotes safe access for residents. For example, access points have been consolidated at carefully designed intersections on Via Alta, which include features such as turn pockets to enhance safety and not impede traffic flow. In addition, traffic calming measures have been incorporated, such as restricted/no parking, discontinuous streets, flashing speed warning signs and pedestrian protection measures to ensure safe and efficient traffic flow far superior to Murray Ridge Road. Franklin Ridge Road has been similarly designed with smooth curves to slow traffic, non-contiguous sidewalks with pedestrian friendly features, restricted/no parking, consolidated/high-visibility access points, speed warning signage and more. A particularly important feature of road connections through Civita are that they are designed to be indirect, resulting in slowed travel speeds and an unattractive “cut-through” option.

8. **Enhanced mobility** – North-south travel through Mission Valley on surface streets is limited, with Mission Center Road as the primary surface street connection to I-805. Traffic volumes within both the Mission Valley and Serra Mesa neighborhoods are better handled with multiple travel options. Murray Ridge Road was never designed to be the sole connection to the Phyllis Place/I-805 interchange; another road connection has always been planned in order to fully utilize the freeway system and serve demand directly in order to reduce VMT and unnecessary out-of-direction travel.

We also realize an important step in the review and approval process for a project is the need for thorough evaluation under the California Environmental Quality Act (CEQA). The CEQA document functions as a disclosure of the project’s impacts, as well as ways that those impacts can be mitigated. We have taken time to carefully review the *Serra Mesa Community Plan Amendment Street Connection (Project) Recirculated Environmental Impact Report* (EIR), and we appreciate the efforts that City staff has made in conducting a comprehensive analysis of the project’s potential environmental effects. As a result of our review, we note the following additional information, clarification of analyses, and corrections of errors which should be considered as part of the final EIR to better support and substantiate the analysis of environmental impacts associated with the proposed Community Plan Amendment (CPA) Project.

L-4

- Avoid Project Objectives that are too broad and/or inaccurate. The statement of objectives for a project is crucial for identifying the underlying purpose of the project. By crafting well-defined project objectives, the Lead Agency can develop a reasonable range of alternatives to evaluate in the EIR and for use in preparing findings and overriding considerations, as necessary.

Objectives such as “Improve local mobility in Serra Mesa and Mission Valley planning areas” are too broad. Local mobility could be improved in a number of ways, from adding pedestrian sidewalks to increased transit service. This objective should be narrowed to apply to the proposed project. For example: Improve local mobility in Serra Mesa and Mission Valley planning areas through the construction of a planned roadway that allows vehicular, bicycle, pedestrian, and transit travel.

L-4
cont.

Particularly relative to Objective 1, “Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa”, the Final EIR should clearly state that an objective of the project is to amend the Serra Mesa Community Plan to include the roadway connection construction as called for in the Mission Valley Community Plan. Not implementing this roadway could have significant detrimental effects on an already congested community.

L-5

- Avoid use of subjective language. An EIR must be objective and avoid text that implies subjectivity or leaves a determination for impacts ambiguous. For example, the EIR references a proposed roadway design speed of 55 miles per hour; although the EIR discloses that the posted speed limit “would most likely be much less than 55 miles per hour” [emphasis added]. The EIR goes on to state that this determination cannot be made until the facility is operational. The EIR should make a factual statement regarding the expected posted roadway speed. A solution would be to include language in the CPA that requires a lower speed limit, in which case the reduced speed would become a project feature.

(We support a lower design speed for the roadway connection. A high posted speed limit for a relatively short roadway segment, connecting on both ends to urban communities that attempt to promote walkability, active transport, and general community cohesion, is not appropriate. A slower speed is more compatible with adjacent and planned developments and more in keeping with the roadway design.)

L-6

- Provide accurate information and correct inaccuracies. The Final EIR should be careful to eliminate inaccuracies and ensure the information is updated, as appropriate. For example, the EIR states that construction of the roadway is anticipated to begin in 2017. This date is not accurate, as 2017 is nearly halfway over and the project still needs to go through public hearings. The date should be revised in the Final EIR to reflect a more realistic and accurate construction date.

Please Identify who will be responsible for the project implementation/construction and its mitigation. The EIR does not disclose what party or other mechanism will be responsible for constructing the roadway connection and the mitigation measures included in the EIR, or how such construction is being funded. Responsibility for construction and funding will affect the project’s timing. Until this is determined, it may be impossible to include a meaningful construction date. The City may wait until a funding source becomes available, or the connection may be included in a Capital Improvement Plan, or perhaps the project will be wrapped into the Mission Valley Community Plan Update. These funding and implementation mechanisms all result in different timing. When the project is actually constructed has ramification on the accuracy of the technical studies and the assumptions made within these documents.

L-6
cont.

Project acreage is inconsistent throughout the EIR. Although the reference is mostly to two acres, the project area is also noted as 2.05 acres (p. 5.3-15) and 2.16 acres (p. 5.5-15). Where the acreages vary, explanation should be provided as to why. Similarly, the EIR generally states that I-805 is located 0.25 mile east of the project site, but on p. 5.9-1 it is located 0.22 mile east of the project site. Additionally, the title of Figure 2-6, Fire and “Pol6ce” Stations within Project Vicinity, should be corrected relative to the spelling of “Police”. Discussion in the third full paragraph on Page 5.1-11 ignores existing RM-1-1 zone; this should be corrected.

L-7

- Modify Mitigation Measures to Successfully Mitigate Impacts. Mitigation measures in Section 5.2 require removal Class II bikeways and a 6-foot-wide sidewalk separated from the street by an 8-foot-wide parkway to implement the mitigation measures (MM-TRAF-8). Consideration should be given to expanding mitigation measures to include other options that ensure impacts will be mitigated to below a level of significance, without losing bike lanes, such as reducing lane widths and/or reducing sidewalks and parkway widths where necessary.

L-7

Providing an interconnected street grid that responds to a variety of mobility needs and connects neighboring communities in a way that facilitates access to services and amenities, while also relieving congestion and improving traffic flow, is essential for the development of smart growth villages that serve San Diego and respond to the needs of 21st century living. We cannot continue to eliminate important planned roadway connections and still ensure a viable circulation system that supports the planned growth for our region, the goals of the City’s General Plan, and the objectives of our Climate Action Plan.

We urge you to consider our comments so that the Final EIR accurately and completely evaluate impacts associated with the project and ensures implementable measures to mitigate its impacts.

Sincerely,



John La Raia
Sr. Director, Development

Letter L: H.G. Fenton Company

L-1: This comment states that detailed comments are attached. Each comment is addressed below. This comment does not specifically raise issue regarding the adequacy of the DEIR.

L-2: This comment provides an overview of the H.G. Fenton Company and generally expresses support for the proposed project. This comment does not specifically address the adequacy of the DEIR.

L-3: This comment provides eight reasons as to why the commenter supports the proposed project. This comment does not specifically address the adequacy of the DEIR.

L-4: This comment states that the commenter appreciates the efforts the City has made in conducting a comprehensive analysis of the project's effects. It also contends that the DEIR should avoid project objectives that are too broad or inaccurate.

As Lead Agency, the City has the discretion to define the project objectives. Please refer to Section 3.1 of the DEIR and see response to comment K-11. The City does not agree that the objectives were too broad or inaccurate. The DEIR's objectives are sufficiently broad to allow for a reasonable range of alternatives and sufficiently narrow to properly describe the underlying purpose of the project. No revisions to the FEIR are warranted as a result of this comment.

L-5: This comment states that the DEIR should avoid the use of subjective language and references an excerpt of the DEIR where it is stated that the speed limit would "most likely be much less than 55 miles per hour."

The City agrees with this comment and this language has been removed from the FEIR (see Section 3.3.1.1 of the FEIR). The speed limit of the roadway cannot be determined at this time. The roadway has been conceptually designed to be a four-lane major roadway, which has a speed limit of 55 miles per hour. During the final design of the roadway, additional factors will be taken into account in developing the final speed limit of the roadway. Nevertheless, as the project has been designed to be in accordance with the Street Design Manual and the recommended speed limits therein, this would not change the conclusions of the analysis within the DEIR.

L-6: This comment states that the construction date of the roadway is not accurate. It also states that project acreages throughout the DEIR are not consistent.

The construction date of the roadway, as detailed within Chapter 3, *Project Description*, was assumed to be 2017 as it is possible that construction could occur during this year and it also represents a conservative analysis for the technical analysis. For example, concerning air quality, emission factors from construction equipment and trucks reduce over time. Therefore, an emission factor in 2017 is lower than an emission factor in 2018 and beyond. If the air quality modeling was to be remodeled for a different construction year, it would therefore be lower than the analysis shown within the DEIR.

Concerning the acreage, the project site is consistently referred to throughout the DEIR as "approximately" 2 acres; however, page 5.3-15 has been revised within the FEIR to read "2.16 acres" instead of 2.05 acres. Figure 2-6 has been revised to spell "Police" correctly. Page 5.1-11 within Land

Use has been updated to include the mention of the RM-1-1 zone. These minor corrections do not affect the analysis of the DEIR and is clarifying information.

L-7: This comment states that mitigation within Section 5.2 of the DEIR, such as MM-TRAF-8, would require the removal of bike lanes and that other considerations should be given, such as reducing lane widths or reducing sidewalks and parkway widths where necessary.

As detailed within Section 5.2, *Transportation and Circulation*, of the DEIR, mitigation measure MM-TRAF-8 was not assumed to be implemented because it would conflict with various plans, including the Quarry Falls Specific Plan. As such, it is assumed that this mitigation measure will not be implemented as the loss of bicycle lanes is in conflict with the adopted long-range plans for the area. The commenter suggests narrowing lane widths; however, this would not be in compliance with the City's Street Design Manual and would potentially pose a risk to drivers and pedestrian and cyclist safety. No other alternatives have been identified. In addition, the landscaped parkways and sidewalks have already been planned and approved within the Quarry Falls Specific Plan and the proposed project would then be required to amend the specific plan, which is not a component of the project.

L-8: This project generally states support for the proposed project and states that the City should consider the comments within the letter.

The City has considered all the comments within the letter and has responded accordingly above in responses L-1 through L-7.

From: [Morrison, Susan](#)
To: [Kazmer, Greg](#)
Subject: Robert Garner Comment - Franklin EIR Chen Ryan Koa
Date: Friday, April 07, 2017 9:24:08 AM
Attachments: [RE Franklin EIR Chen Ryan Koa.msg](#)
[Franklin EIR Chen Ryan Koa.msg](#)

Hi Greg--

Here's the email chain for that comment I sent you on 3/30 regarding compliance with the State Licensing Board and California Business and Professions Code Paragraphs 6700 through 6799. The commenter did provide a bit more explanation (see his attached emails for RTCs--can probably just use the one). Per Seth and Keely's recommendation, I have forwarded this on to Monique Chen for assistance.

Susan

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

From: Morrison, Susan
Sent: Thursday, April 06, 2017 10:14 AM
To: Chen Ryan Associates Inc <Mchen@chenryanmobility.com>
Subject: Franklin EIR Chen Ryan Koa

Hi Monique--

We received the comments below regarding the TIS for the Serra Mesa CPA Recirculated Draft EIR that went out for public review last week on March 29, 2017. Mr. Garner is questioning the compliance of the TIS with the requirements of the California Business and Professions Code Paragraphs 6700 through 6799.

Keely Halsey from the City Attorney's Office suggested I contact you to get the assurances we need regarding licensing. Any guidance you can provide on how to respond to his comments would be greatly appreciated.

Thank you!
Susan

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

From: rgarner2@san.rr.com [<mailto:rgarner2@san.rr.com>]
Sent: Thursday, March 30, 2017 2:05 PM
To: Morrison, Susan <SIMorrison@sandiego.gov>
Subject: RE: Franklin EIR Chen Ryan Koa

I recommend review by the State Licensing Board because it appears that Chen & Ryan are using KOA Engineering without apparent authorization from KOA, and without evidence of responsible charge by Chen & Ryan for the work done by KOA. I did not see Chen & Ryan's engineering seal. J. Arnold Torma retired just after the last report was issued and his license as displayed on this apparent repeat of his report is out of date.

Again, I recommend State Board Review of this.

Respectfully,

Robert C. Garner, P.E.

---- "Morrison wrote:

> Hi Robert--

>

> I consulted with the City Attorney on the project but she wasn't sure what the issue was regarding the Traffic Impact Study and the following: http://bpelsg.ca.gov/laws/pe_act.pdf

>
> Is this in regards to the engineer not being properly qualified or the stamp and signature? We would appreciate further explanation on the issue and any suggestions you have as to how you would like the City to address it.

>
> Thanks,
> Susan

>
> -----Original Message-----
> From: rgarner2@san.rr.com [<mailto:rgarner2@san.rr.com>]
> Sent: Thursday, March 30, 2017 7:34 AM
> To: Morrison, Susan <SIMorrison@sandiego.gov>
> Subject: Franklin EIR Chen Ryan Koa

>
> Susan,
>
> The Reports in Appendix C of the Franklin Ridge Road EIR that I was able to access appear not to be in compliance with the requirements of the California Business and Professions Code Paragraphs 6700 through 6799. I recommend that you check with legal on this.

>
> Thank you.
>
> Robert C. Garner, P.E.

M-2

Letter M: Robert C. Garner, P.E.

M-1: The commenter suggests that Chen Ryan is using KOA Engineering without their authorization and without evidence of responsible charge, and recommends review by the State Licensing Board. The commenter also states that they did not see Chen Ryan's engineering seal on the Traffic Impact Study (Appendix C of the DEIR).

In 2011, the City and KOA Corporation entered into contract for traffic engineering work, which led to the referenced traffic impact report. Subsequently, in 2016, the City and Chen Ryan and Associates entered into contract to augment the report to reflect a plan-to-plan analysis, necessitating no new analysis. In accordance with Article VIII – Intellectual Property Rights, of both the contract with KOA Corporation and Chen Ryan, the report and all parts thereof are the property of the City. Permission from KOA Corporation would not be necessary in this case. Chen Ryan has stamped and signed the Traffic Impact Study, which is provided as the updated Appendix C for the FEIR.

From: [FIROOZ](#)
To: [PLN_PlanningCEQA](#)
Subject: Project Name (Serra Mesa Community Plan Amendment Roadway Connection Project) and Number (265605)
Date: Friday, March 31, 2017 1:56:51 PM

Dear Ms. Morrison,

Please note that the subject Plan will have devastating effects on noise pollution and the safety of residents, especially the children who will be crossing the streets to go to school, park, etc. Please realize that the selling points of the developers have always been walk to school and to work community. If the project proceeds as planned, someone needs to take responsibility for any accident to the children as a result of such decision.

Best regards,

F. Rasouli

2349 Aperture Circle

San Diego, CA 92108

Letter N: F. Rasouli

N-1: The commenter alleges that the proposed roadway connection will have a devastating effect related to noise pollution and the safety of residents and children walking to school and parks. The commenter states the selling point for purchasing a home in Civita was the ability to walk to school and work.

Regarding pedestrian safety, please see the responses to comments F-4 and F-5. Please also see the response to comment F-2. This comment expresses opposition to the proposed roadway connection and raises general concerns related to noise and the usage of parks, but does not specifically raise an issue concerning the adequacy of the DEIR. Moreover, all the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please refer to Sections 5.2, *Transportation and Circulation*, and 5.4, *Noise*. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to construction noise. No revisions to the FEIR are warranted as a result of this comment.

From: [Buell, Sue](#)
To: [PLN_PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project: Recirculated Draft Environmental Impact Report
Date: Friday, March 31, 2017 1:54:03 PM

Attn: Susan Morrison, Environmental Planner,

City of San Diego Planning Department,

010, 2nd Avenue, Ste. 1200, East Tower, MS 413, San Diego, CA 92101

Mitigating measures will not solve the dangers that our community will face by adding a Roadway Connection into the Civita Master Plan. We have a high density area designed to accommodate a safe, walking community in the middle of Mission Valley. This has been a unique and highly visible project that has won national awards. Other Cities will use our community as a model for future Master Plans...Live, work, walk and enjoy a safe life!!!

Allowing traffic to cut the community into sections is a huge takeaway from the original intention of the Civita Master Plan. This Plan destroys the beauty and original intent of our walking, living, working community. More importantly, it creates huge safety problems that cannot be resolved. We already have people speeding through Civita, blowing their horns and revving up their engines to setup off car alarms as they pass down Civita Blvd. The police have not been able to resolve this issue, understandably because they can't be here all the time! By adding the access to 805 straight through our community, we are opening the way for drivers to race down the weaving roads, past our family homes, children, and pets. This also raises the risk of vehicles being stolen as they have quick access to the 805 South down to the border.

There is a beautiful new park that will soon be open in Civita, welcoming people from Serra Mesa and other parts of the City to visit and enjoy the park's amenities. Aesthetically the roads hurt the overall appearance of the park, but of much more concern, is the danger allowing easy access from the park to the 805. Kids will be walking across streets to play at the park. The City has a responsibility to keep us safe!!! This roadway poses great dangers. Please don't mitigate, reconsider! At minimum keep the access away from Via Alta, which cannot safely accommodate traffic!!!! Thank you!

Sue Buell

7851 Inception Way

San Diego, CA 92108

619-961-6499

Please send your written comments to the following address: **Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010, 2nd Avenue, Ste. 1200, East Tower, MS 413, San Diego, CA 92101** or e-mail your comments to PlanningCEQA@sandiego.gov with the Project Name (Serra Mesa Community Plan Amendment Roadway Connection Project) and Number (265605) in the subject line.

Sue Buell
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Letter O: Sue Buell

O-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety, crime, and aesthetics.

Please see the response to comment F-2, as well as the response to comment F-4 regarding pedestrian safety.

Crime is generally not considered an issue subject to CEQA, unless crime results in a physical impact on the environment or there is evidence to indicate that the project would increase crime that would lead to a physical impact on the environment. The commenter has not provided any substantial evidence as to how a roadway connection would increase crime or why crime would result in a physical impact on the environment.

Regarding the commenter's concerns about an increase in accidents, there is a potential for accidents to occur on any roadway. The proposed roadway connection has been conceptually designed to be consistent with the City's Street Design Manual (2002) and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection. The City's Street Design Manual contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way and for the safe design of intersections. Furthermore, the commenter's concerns about increased congestion are analyzed, and the impacts are disclosed, in Section 5.2, *Transportation and Circulation*, of the DEIR. As indicated in the DEIR, significant and unavoidable traffic impacts were identified along segments of Murray Ridge Road (2017 and 2035), Franklin Ridge Road (2035), and Rio San Diego Drive (2035) and at intersections Murray Ridge Road and Sandrock Road (2035), Murray Ridge Road and the I-805 Northbound and Southbound I-805 ramps (2035).

Regarding the commenter's concerns about the proposed roadways effects on the aesthetics of the new park in Civita, as discussed in Section 5.9, *Visual Effects and Neighborhood Character*, the proposed roadway would be minimally discernible from the surrounding area due to the substantial development occurring within Civita and other existing development near the project site. In addition, landscaping that conforms to the City's Landscape Regulations would be included in the project design to enhance the aesthetic character of the street design. No changes to the FEIR are required as a result of this comment.

From: [Areen Yuson](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project
Date: Friday, March 31, 2017 12:55:53 PM

Hi Susan Morrison,

Greetings!

P-1

I am NOT FAVOR with the roadway connection project. I want to keep our community to be quite and not too busy with traffic. If you open the connection the possibility of the residents around Friars road and the busy shopping centers around civita plus the stadium can cause heavy number of cars trying to avoid FRIARS road going to 163 freeway. I dont think that this is a great idea. Civita residents can always use Mission Center Road to Murray Ridge Rd to get to I805. I dont see the needs of having an extra road that will cost some money too. Please use that budget somewhere else. Please let me know if you have any questions.

Thank you!

Areen Yuson
Civita Resident
2436 Via Alta
San Diego CA
92108

Letter P: Areen Yuson

P-1: The commenter expresses opposition to the proposed roadway connection and would like to keep Civita quiet and not busy with traffic. The commenter suggests that the proposed roadway could cause a heavy number of cars to try to avoid Friars Road to get to SR-163. The commenter suggests the City use the money somewhere else.

Please see the response to comment F-2. This comment does not specifically raise an issue regarding the adequacy of the DEIR. Please see Sections 5.2, *Transportation and Circulation*, and 5.4, *Noise*, of the DEIR. As indicated in the DEIR, significant and unavoidable traffic impacts were identified along segments of Murray Ridge Road (2017 and 2035), Franklin Ridge Road (2035), and Rio San Diego Drive (2035) and at intersections at Murray Ridge Road and Sandrocks Road (2035), Murray Ridge Road and the I-805 Northbound and Southbound I-805 ramps (2035), and a design hazard associated with left turns from the existing City View Church parking lot due to its proximity to the proposed project intersection at Phyllis Place and the proposed roadway. In addition, potential impacts related to construction noise would be less than significant with mitigation. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

Letter Q

From: [linda mccormick](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa plan for connector
Date: Saturday, April 01, 2017 8:58:08 AM

Q-1

I bought into Civita based on the projection that it would be a walkable community. The nature of the community will be irreparably harmed by the current plans regarding the Serra Mesa changes. I oppose them.

Linda McCormick
7848 Civita Blvd.
San Diego, CA 92108

Letter Q: Linda McCormick

Q-1: The commenter expresses opposition to the proposed project.

Please see the response to comment F-2. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

From: [Sabrina Perrino](#)
To: [PLN PlanningCEQA](#)
Subject: 265605 Serra Mesa Community Plan Amendment Roadway Connection Project)
Date: Sunday, April 02, 2017 8:49:10 AM

Dear Ms. Susan Morrison,

R-1

I have lived in San Diego since 1986 and know this county well. Mission Valley has a reputation of being overcrowded and not family friendly. Civita is a unique opportunity to change all that. Trees and other foliage are being planted. Families are being their children outside to play. Adding another access road would disrupt all of that. Please consider protecting our community. It is to the benefit of Mission Valley, our home.

Sincerely,
Sabrina Perrino, MD

Letter R: Sabrina Perrino, MD

R-1: The commenter expresses opposition to the proposed roadway connection. The commenter states that adding an access road would disrupt the Civita community and prefers to keep the community protected.

Please see the response to comment F-2. Concerning the perceived character of the Civita community (which is not fully built out and only partially constructed), as discussed in Section 5.9.5 of the DEIR, the proposed project would also not result in significant impacts on the existing or planned character of the area. The proposed project would increase the average daily traffic along Phyllis Place as it would provide a connection southwards to Mission Valley. However, the Serra Mesa Community Plan calls for Phyllis Place to be classified as a four-lane major road. Therefore, the proposed project would not change the planned character of the area. The proposed roadway would similarly not change the character of existing residential areas to the west of the project site as there would not be a substantial amount of vehicles traveling west of the roadway connection. For example, the Abbotshill neighborhood of Serra Mesa, northwest of the project area, does not contain an outlet to a larger road network. As a result, the neighborhood character would not be significantly affected. Furthermore, changes in community character are considered a social issue and not an environmental issue under the purview of CEQA (*Preserve Poway v. City of Poway*, 245 Cal. App. 4th 560). Accordingly, changes in community character are not considered an environmental impact under CEQA. No revisions to the FEIR are warranted as a result of this comment.

From: [Jim Bowers](#)
To: [PLN_PlanningCEQA](#)
Subject: Civita Roadway Expansion Project-OPPOSED
Date: Sunday, April 02, 2017 11:33:02 AM

Dear Ms Morrison

My wife & I are Civita homeowners who are OPPOSED to the Franklin Ridge roadway expansion project.

Civita was built & advertised as a "walkable" community. This roadway project will completely alter that goal and make traffic a nightmare in our residential area.

Mission Center road already exists to service this traffic route. As a 27 year Mission Valley workplace employee, I can honestly say Mission Center Road is under utilized. In other words, we don't need another road basically on top of the fully capable/already existing Mission Center Road.

Mission Valley can only improve when it becomes a truly walkable neighborhood, just like Bankers Hill or Hillcrest. Please don't let cars prevail over people.

As a side note, a much better use of City resources would be development of the SD River water front.....why can't it be more like San Antonio as opposed to the homeless encampment it currently is??

Thank you for your kind consideration

Jim Bowers

Sent from my iPhone

S-1

Letter S: Jim Bowers

S-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding walkability.

Please see the responses to comments F-2 and F-5. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

From: [Douglas Frost](#)
To: [PLN_PlanningCEQA](#)
Subject: PlanningCEQA@sandiego.gov with the Project Name (Serra Mesa Community Plan Amendment Roadway Connection Project) and Number (265605)
Date: Monday, April 03, 2017 11:34:47 AM

T-1

My household is against the construction of this outlet to Phyllis street. This would not serve the community of Civita in the best interest. This is supposed to be a community, not a high volume traffic area. When we bought our house here, we were sold on that fact. Please understand and take our concerns about this proposed connection very seriously.

Thank you,
Douglas and Lauren Frost

Letter T: Douglas and Lauren Frost

T-1: The commenter expresses opposition to the proposed roadway connection and states that Civita is not a high-volume traffic area.

Please see the responses to comments F-2 and R-1. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

From: [Joceline Remigio](#)
To: [PLN_PlanningCEQA](#)
Cc: [Deborah Bossmeyer](#)
Subject: Project Name (Serra Mesa Community Plan Amendment Roadway Connection Project) and Number (265605)
Date: Monday, April 03, 2017 1:14:41 PM

To whom it may concern:

U-1

Need to STOP this project...We moved in this community to get away from traffic and experience for once a walkable community and nowthis project....I believe money of the City is better spent on other projects.....Please do not rock the boat....We are settling in this dream community that my family especially grandchildren can just walk safely without the hustle and bustle of traffic....

Joceline Remigio
Civita Community
Origen
7871 Inception way
San Diego, Ca 92108

Letter U: Joceline Remigio

U-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding the effects of increased traffic on walkability and pedestrian safety within Civita.

Please see the responses to comments F-2 and R-1. This comment expresses opposition to the proposed roadway connection and raises concerns related to increased traffic, pedestrian safety, and walkability, but does not specifically raise issues regarding the adequacy of the DEIR.

From: [Lisa Tansey](#)
To: [PLN_PlanningCEQA](#)
Cc: smpg@serramesa.org
Subject: Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
Date: Monday, April 03, 2017 11:31:41 PM

Hello City of San Diego Planning Department,

I was included on an email from my local neighborhood planning group, with a link to the latest EIS for us to review and comment on.

I bought my house in the Abbott's Hill neighborhood back in 2002. Not too long after I bought it, the Sudbury redevelopment project came in with its plan to turn the old quarry into thousands of homes, including a proposal to connect Phyllis Place with a new street that would come up the hill from the new development.

Back then, there was an EIS done which clearly showed that it would, among other negative consequences to my neighborhood:

- 1) diminish the visual beauty of the Southern view from Phyllis Place out over Mission Valley, and
- 2) dramatically increase the traffic entering our neighborhood.

My neighborhood said no.

Now that the project is well underway, I can confirm the mock-up drawings done for (1) were all true. I see the rooftops of buildings making their way up the hill, instead of the view. As for (2), even without the feeder road, there is a lot more traffic, resulting in the large D below. Back when I moved in to the neighborhood, there was never a wait to get on or off the freeway. There weren't even traffic signals at those off-ramps, but they've had to be added thanks to all the new traffic.

Imagine my surprise to see the same connector road being suggested again!

You can see from the section of the table I pasted in below that my access would go from A all the way down to an F. And take the already hard-hit D also down to an F.

Table 3.1:

Phyllis Place Serra Mesa Community Plan Amendment

Page 16 Street Connection Technical Report

Table 3.1 Year 2017 (Near-Term) with Project vs. without Project

Roadway Segment Assessment Roadway Segment Lanes/ Classification LOS E Capacity 2017 w/o Project 2017 w/ Project Comparison ADT V/C LOS ADT V/C LOS V/C SI?

Abbotshill Road to Franklin Ridge Road 2C NF 10,000 2,420 0.242 A 2,420 0.242 A 0.000 No

Franklin Ridge Road to I-805 SB Ramp 2C NF 10,000 2,420 0.242 **A** 23,355 2.336 **F** 2.0935 Yes

I-805 SB Ramp to I-805 NB Ramp 2C CL 15,000 10,785 0.719 **D** 17,599 1.173 **F** 0.454 Yes

Here's another choice tidbit from table 3.2:

14. Murray Ridge Rd & I-805 NB Ramp Signal AM 9.9 A 24.0 C 14.1 No PM 11.0 B 59.4 E
48.4 Yes

15. Murray Ridge Rd & I-805 SB Ramp Signal AM 14.0 B 34.8 C 20.8 No PM 21.8 C 141.4

F **119.6** Yes

In this, the large numbers show how many more seconds everyone in my neighborhood will have to wait to go north or south on the I-805. Most of a minute to go North, almost two minutes to go South!

The 2035 looks even worse! **329.6** seconds! That is, everyone in my neighborhood will have to wait FIVE AND A HALF extra minutes if we want to drive south in the afternoon rush hour. Whew! Lucky for me, I'll be retired hopefully by 2035, but it will be pretty unpleasant for anyone trying to go somewhere south from my neighborhood at that time.

I see you know there's a problem - I found these sentences in the report as well:

"As shown in Table 4.4, the metered on-ramps are projected to operate with less than 15 minutes of delay with the exception of the following during the PM peak hour:

I-805 Southbound On-Ramp at Murray Ridge Road - **31 minutes of delay."**

Cars overheating and running out of gas seem likely with a HALF HOUR wait!!!

But I see reading further that you have mitigation plans that you think will bring the level of service back up from awful to just regular bad. I surely would insist that all the mitigations be done FIRST, before you ever put the connection in. Just in case, so as to avoid any delays like shortage of funds.

I understand why this proposal keeps coming up. All those dwellings that you have allowed developers to build in Mission Valley have created a nightmarish traffic jam for the people trying to get in and out of the Valley. In my opinion, the Valley should never have been developed at all. Common sense would suggest that a river valley be used for agriculture, since the soil is rich and naturally irrigated. Also a bad idea to build houses as it will naturally occasionally flood.

However common sense has already been ignored for some decades and now all those people are trapped down there. How to get them out? Well, obviously, compromise the traffic quality of the neighborhoods nearby by building connector roads to them.

I think you should be somewhat embarrassed to keep asking my neighborhood to change our neighborhood plan for this. But I do understand the need.

If we did agree to it, you'd have to give us something in return, in addition to assuring us that the mitigations would be put in place BEFORE the connecting road. One thing I'd like to see would be some kind of mass transit. I doubt a trolley could make it up the hill, but maybe a

V-1
cont.

V-2

V-2
cont.

bus stop. Also I recall that the developer himself originally offered our neighborhood some goodies - I remember two of them - first, he was going to set up an enormous boulder just West of the new intersection with the words "Abbott's Hill" on it to demarcate the entrance to our neighborhood - so that these thousands of new commuters would be less likely to get lost in our neighborhood. Also he was going to let us use the Civitas facilities - some sort of clubhouse, etc., for the same monthly fee as the residents would pay.

My two cents comment.

-Lisa

Lisa Tansey
2364 Greenwing Drive
San Diego CA
92123

Letter V: Lisa Tansey

V-1: The commenter is a resident of the Abbott's Hill neighborhood and references the EIS prepared for the Quarry Falls project. The commenter states that the Quarry Falls EIS indicated that the development would have negative effects to the neighborhood including diminishing the visual beauty over Mission Valley and increased traffic in the Abbott's Hill neighborhood. The commenter states that the neighborhood opposed the residential project that replaced the old quarry, and describes how traffic conditions changed.

Please see the response to comment F-2. This comment describes effects associated with the Quarry Falls project, but does not specifically raise issue regarding the proposed project or the adequacy of the DEIR.

V-2: The commenter refers to Tables 3.1, 3.2, and 4.4 of the Traffic Impact Study (Appendix C of the DEIR) and summarizes information from those tables.

This comment repeats information contained in the Traffic Impact Study. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Traffic Impact Study or the DEIR.

V-3: The commenter requests that the project's mitigation be implemented prior to development of the project. The commenter expresses concerns about the development in Mission Valley and the traffic associated with the development. The commenter suggests the implementation of mass transit, trolley, or a bus stop. The commenter also indicates that the developer for Quarry Falls promised a boulevard with the words "Abbott's Hill" or to let the neighborhood use the Quarry Falls' facilities for the same monthly fee as the residents.

As described in Section 5.2, *Transportation and Circulation*, of the DEIR, the following mitigation measures shall be implemented: MM-TRAF-3, MM-TRAF-4, MM-TRAF-5, MM-TRAF-6, MM-TRAF-7, MM-TRAF-11, MM-TRAF-12, and MM-TRAF-17. These measures shall be implemented prior to the commencement of any grading activities or prior to issuance of a grading permit if a grading permit is required. As further discussed in Section 5.2, the proposed roadway could provide for a bus route connection from Serra Mesa to the existing trolley stops at Rio Vista or Mission Valley Center; however, the bus routes are planned, owned, and operated by MTS and any new route would need to be implemented by MTS.

The comments related to Quarry Falls and its amenities do not raise specific issues regarding the adequacy of the environmental analysis in the DEIR.

From: [Scott Fitzgerald](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Amendment Roadway Connection Project
Date: Monday, April 03, 2017 12:39:49 PM

Good Afternoon,

I am writing the letter regarding the Serra Mesa Community Amendment Roadway Connection Project and the impact that it would have on my neighborhood (Civita) if it proceeds.

When I moved to the Civita area, Sudberry, Sheahomes, and CalAtlantic, promoted the family aspect of the Civita project. This included park area, retail shops, dog parks and an Amphitheater all meant to enhance the community and family experience. I feel that the planned project to extend a road from the 805 freeway, Phyllis Place to Franklin and Alta Way will only destroy the quality of life for the community who live in the area. There are several families who have children and pets who walk along Via Alta daily. Currently, the traffic on Via Alta is terrible due to drivers who speed on a constant basis and do not heed the stop lights or stop signs. Many times I have seen people with kids and dogs nearly get run over by inconsiderate drivers who actually live in this area but feel that Via Alta is their private speedway. I have also nearly been hit by drivers who do not pay attention to the stop lights, or stop signs, this also includes construction workers who also drive very fast through the area.

W-1 Extending the roadway to connect with Franklin and Via Alta will only create more traffic but with drivers who are in a hurry to get from the freeway to their destination. It's bad enough now with all the speeders and construction traffic, it will only get worse and I'm afraid there will be some serious accidents due to the speed of people driving along Via Alta, especially when they are heading downhill. People pulling out from their complexes (Apex, Frame and Focus, Lucent, and Origins) will have a hard time dealing with all this traffic plus pedestrians. It's hard enough getting across the street when I am walking my pet during peak traffic times, I can't even imagine what it will be like if the roadway is approved. Also, a dog park will be opening at the top of Franklin and Via Alta in a few weeks. The dog park will be enjoyed by families with their pets and children, most of whom will be walking to this area. Imagine having to try and cross the street with your kids and pets with constant traffic blowing by all hours of the day.

If there is no way to stop this roadway from being built I would urge you to consider putting in speed bumps along both lanes of Via Alta to discourage speeding and make it somewhat safer for us residents who must endure the traffic nightmare that this extension will create. It is a very busy street now, I really would hate to see a child or pet run over by drivers who just don't care about speeding or traffic signs.

Thank you for your time.

Julie Fitzgerald
8411 Distinctive Drive

Letter W: Julie Fitzgerald

W-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding quality of life, additional traffic, and pedestrian safety. The commenter also describes existing traffic conditions along Via Alta, including construction traffic and speeding vehicles. Further, the commenter requests the implementation of traffic calming measures such as speed bumps along Via Alta if the project is approved.

Please see the response to comment F-2. This comment also describes existing conditions related to speeding vehicles and construction traffic. As these are existing conditions, and not related to the proposed project, they do not raise issue regarding the adequacy of the DEIR. In addition, concerns raised by the commenter related to quality of life is not an issue that is under the domain of CEQA unless attributed to a specific physical impact on the environment. The commenter has not provided any substantial evidence as to how a decrease in quality of life would result in a physical impact on the environment. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Regarding the commenter's request to include traffic calming measures, the proposed roadway and access points have been conceptually designed to be consistent with the City's Street Design Manual and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection. The City's Street Design Manual (2002) contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. The road connection would include bicycle lanes and a sidewalk for pedestrians that would be consistent with the City's Street Design Manual (2002). During final design of the proposed roadway, the City will consider whether traffic-calming measures are necessary to ensure pedestrian safety. No changes to the FEIR are required as a result of this comment.

From: [Bryan Criger](#)
To: [PLN_PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project 265605
Date: Monday, April 03, 2017 6:10:07 PM

To Whom it may concern,

I am a resident in the Civita community and I am strongly opposed to the roadway connection project. There seems to be little need/benefit for this connection yet the cost remains extremely high.

I would first like to address the need. There seems to be a need to connect traffic from Friars road to the 805. As a mission valley resident I can already confirm this exists. A car can easily transit to the 805 via mission center dr. I do not understand the benefit of shifting traffic through a residential community.

The cost. Would you want an increase in traffic by your house and kids when a viable road already exists? Aside from the impact on my community I have to ask why the city would spend money on such a frivolous project. Please as a San Diego resident, put the money where it can do some good. Not building unnecessary and redundant roadways.

Very Respectfully,
Bryan Criger

X-1

Letter X: Bryan Criger

X-1: The commenter expresses opposition to the proposed roadway connection and questions the benefits and needs of the proposed roadway connection.

There is no requirement to include the benefit or need for a proposed project pursuant to CEQA. The objectives of the proposed project are outlined in Section 3.1 of Chapter 3, *Project Description*, of the DEIR. Please also see the response to comment F-2.

From: [Irma villavicencio](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Connection Project#265605
Date: Wednesday, April 05, 2017 9:35:07 PM

Susan Morrison
Environmental Planer
City of San Diego Planning Department.

My name is Irma Villavicencio.

I chose to move to the Civita-Lucent Frame and Focus community because the location was exactly what I was looking for. The walkability and friendly quaint neighborhood.

I am completely against with the Serra Mesa Franklin Ridge Connection. It would be a detrimental impact to our community in the following ways:

- 1.- Public safety, more cars, more traffic, more road maintenance, more cost, excessive noise and pollution.
- 2.- Lack of privacy
- 3.- Community aesthetics would be jeopardized.
- 4.- Peace and tranquility would be none existing, this was a big consideration on my part when buying a Lucent Home in Civita community.

I am a resident living along Via Alta and again I am 100% against your proposal.

Irma Villavicencio
8435 Distinctive Drive
San Diego, Ca.92108
619-458-9581

Y-1

Letter Y: Irma Villavicencio

Y-1: The commenter is a resident of Civita and provides reasons for purchasing a home in Civita. The commenter expresses opposition to the proposed project and general concerns regarding public safety, increased traffic, increased road maintenance, increased cost, increased noise, and increased pollution. The commenter also raises concerns that the proposed project will decrease the resident's privacy and affect the peace and tranquility of the neighborhood. The commenter indicates that community aesthetics would be jeopardized.

Please see the response to comment F-2. All of the general environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, 5.8, *Hydrology and Water Quality*, and 5.9, *Visual Effects and Neighborhood Character*, of the DEIR. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to construction noise and visual effects/neighborhood character. All other potential impacts were determined to be less than significant, including those related to air quality.

The commenter's concerns regarding increased cost and decreased privacy, peace, and tranquility are broad statements and are not issues that are under the domain of CEQA unless attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: [Andrea Winter](#)
To: [PLN_PlanningCEQA](#)
Subject: Civita EIR Serra Mesa Community Plan Amendment Street Connection / Project No. 265605
Date: Thursday, April 13, 2017 4:42:32 PM

Dear Sir/Madam,

- Z-1 | I am writing to object to the proposed Road Connector and have a list of concerns/questions for your review & response:
- Z-2 | 1. Transforming Via Alta into a "Major Street" will undermine the pedestrian friendly neighborhood we were promised by Sudberry.
- Z-2 | See attached Sudberry PROMO Video for Civita: <https://www.youtube.com/watch?v=mM6F8u8RdQY>
- Z-2 | Please demonstrate how the addition of this road connector will improve the already Walkable Community we live in.
- Z-3 | 2. Please explain how Civita residents living on the West side of Via Alta (Namely Origen, Lucent, Frame & Focus, Apex communities) and residents on the East Side of Via Alta (Altana, Lucent II, and other future communities) will be able to safely cross Via Alta to access the Park, the recreation center, the retail area and other locations in and out of Civita once you make Via Alta a fast moving thoroughfare - similar to Friars Road. We were promised community amenities (which we pay for) and cutting us off from these vital amenities will result in major community upheaval.
- Z-4 | 3. Please demonstrate how added traffic of cars, trucks, buses, maintenance vehicles, motorbikes along Phyllis Ridge, Via Alta and Franklin Ridge will be better for the environment than the "No Project Alternative".
- Z-5 | 4. How will the connector road not increase noise pollution along Phyllis Ridge, Via Alta, Franklin Ridge, Civita Blvd, and so on. How will families in the residential communities along these roads have a continued right of "quiet enjoyment"?
- Z-6 | 5. Please explain how adding this road connector will not increase crime rates, accidents and added congestion for the people of Mission Valley and Serra Mesa?
- Z-7 | 6. Please demonstrate how adding this road connector will improve air quality in the affected area?
- Z-8 | 7. Please explain why you need to add additional emergency, pedestrian and cycling access when these already exist/are
- Z-8 | already planned for?
- Z-9 | We ask that you do not recommend Serra Mesa Community Plan be amendment to include a street connection. The PEIR does not meet the objectives to improve traffic and in fact it shows negative impacts on the environment, safety, noise and pollution levels in the area. We need other alternatives considered.
- Z-9 | We ask that you deny the CPA as it will not benefit the residents of Civita or Serra Mesa.

Thank you for your help in this matter.

Residents of Civita,

Andrea Winter and Matt Gates

Letter Z: Andrea Winter and Matt Gates

Z-1: The commenter expresses opposition to the proposed roadway connection and indicates that a list of concerns/questions are to follow.

This comment is an introductory statement that does not raise any specific issues requiring a response pursuant to CEQA. Responses to the commenter's specific comments are addressed in comments Z-2 through Z-9 below.

Z-2: The commenter states that transforming Via Alta into a major street will affect the pedestrian friendly neighborhood. The commenter asks how the project will improve the walkable community.

Please see the responses to comments F-4 and F-5. In addition, the proposed project would not change the roadway classification of Via Alta, nor would it result in the widening or other alteration to Via Alta.

Z-3: The commenter expresses concern that the proposed project will prohibit residents from crossing Via Alta to access the park, the recreation center, and the retail area, stating the opinion that Via Alta will be made a fast moving thoroughfare.

The proposed project will not result in changes to the existing speed limits of any existing roadways, including Via Alta and Franklin Ridge Road. Existing signalized, designated pedestrian crosswalks are located at the intersection of Via Alta and Franklin Ridge Road and the intersection of Via Alta and Civita Boulevard. The project does not propose any changes to the existing designated pedestrian crossings within Civita. In addition, the project would provide a roadway with two intersections, sidewalks, and Class II bicycle lanes all designed in accordance with the City of San Diego's Street Design Manual (2002).

Z-4: The commenter requests information on how increased traffic along Phyllis Ridge, Via Alta, and Franklin Ridge will be better for the environment than the "No Project Alternative."

Please see Section 9.5.1 of the DEIR for the analysis of the No Project Alternative. In addition, the No Project Alternative would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as it would not decrease VMT within the study area or the region. Therefore, the No Project Alternative would result in greater impacts associated with transportation and traffic, air quality, and greenhouse gas (GHG) emissions than the proposed project.

As discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, no new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. These trips would be generated as the Mission Valley and Serra Mesa communities continue to grow, regardless of whether the proposed roadway is constructed. It is important to note that buildout of the Civita development will include a substantial number of dwelling units (up to 4,500 units) and commercial space (up to 1.2 million square feet), all of which will generate a substantial amount of traffic. With the connection, traffic coming to and from Civita would have additional local and regional access options. In addition, the proposed project would reduce vehicle miles traveled (VMT), which would in turn would result in a net reduction in GHG and criteria pollutant emissions compared to baseline conditions.

Z-5: The commenter questions how the project will not increase noise pollution along Phyllis Ridge, Via Alta, Franklin Ridge, Civita Boulevard, and so on. The commenter asks how families along these roadways will have a continued right of quiet enjoyment.

The proposed project's potential impacts related to noise are analyzed and disclosed in the DEIR. The methodology for evaluating noise impacts is described in Section 5.4, *Noise*, of the DEIR. As discussed in Section 5.4, noise from project construction activities would be temporary and would cease at the completion of construction. However, significant impacts could result if construction occurs outside of the hours permitted by the City's Noise Ordinance or at any time within 65 to 125 feet (depending on the phase of construction) of occupied residences. The implementation of mitigation measure MM-NOI-1, which requires the development and implementation of a noise control plan during construction, would reduce potential impacts associated with construction noise at future occupied residences to a less than significant level.

Under both the near-term (year 2017) and long-term (year 2035) scenarios, the project, if implemented, is estimated to result in one exceedance of the City of San Diego's 65 decibels (dB) Community Noise Equivalent Level (CNEL) exterior noise standard (at R8, adjacent to Qualcomm Way south of Friars Road), but the associated increase would be less than 3 dB. Traffic noise levels at all other locations studied would be below the City's thresholds. The project would not result in an exceedance of the City of San Diego's exterior noise standards of 70 dB CNEL for churches. As a result, impacts were determined to be less than significant. No changes to the FEIR are required.

Z-6: The commenter requests an explanation as to how the project will not increase crime rates, accidents, and added congestion for the people in Mission Valley and Serra Mesa.

Please see the response to comment O-1. The comment does not raise issue regarding the adequacy of the DEIR.

Z-7: The commenter requests an explanation as to how the project will improve air quality.

The proposed project's potential impacts are analyzed and disclosed in the DEIR. The methodology for analyzing potential impacts is described in Section 5.3, *Air Quality*, of the DEIR. As discussed in Section 5.3, all potential air quality impacts were determined to be less than significant. Both construction and operational criteria pollutant emissions would be below all applicable thresholds, and implementation of the proposed project would reduce criteria pollutant emissions relative to baseline conditions. This result is because of changes in local and regional VMT that would occur with construction of the street connection. The proposed project would offer a more direct route and would divert traffic from other arterials in the vicinity. In addition, the roadway connection would not be substantially longer than other arterials in the area. Therefore, the proposed project would not result in an increase in VMT and corresponding emissions. No changes to the FEIR are required.

Z-8: The commenter requests an explanation as to why additional emergency, pedestrian, and cycling access is needed when it already exists or is planned.

As discussed in Section 7.7, Public Services and Facilities, of the DEIR, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with both the San Diego Fire-Rescue Department and San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. The additional access route would improve

emergency access in the area, potentially reducing emergency response times associated with responders.

In addition, the proposed roadway connection would create a multi-modal linkage between the Mission Valley and Serra Mesa communities in an area where none currently exists. As discussed in Section 5.2, the proposed project would provide a connection for pedestrians and cyclists in the vicinity of the project site. It would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. The proposed project would also complete the pedestrian and bicycle network northward to Phyllis Place, which would provide a connection for pedestrians and cyclists to travel southward to trolley stations, and vice versa.

Z-9: The commenter requests that the Serra Mesa Community Plan not be amended to include the proposed roadway connection. The commenter states the opinion that the PEIR does not meet the project objectives to improve traffic and shows negative impacts on the environment, safety, noise, and pollution levels in the area. The commenter states that other alternatives need to be considered.

The environmental concerns identified by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, and 5.4, *Noise*. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to construction noise. All other potential impacts were determined to be less than significant, including those related to air quality. Pursuant to CEQA Guidelines Section 15126.6, an EIR shall describe 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 less any of the significant effects of the project. Alternatives to the proposed project are described and analyzed in Chapter 9, Alternatives, of the DEIR. These alternatives included the Alternative Location Alternative, the No Build/Remove from Mission Valley Community Plan Alternative, the No Project Alternative, and the Bicycle, Pedestrian, and Emergency Access Only Alternative. As discussed in Chapter 9, the alternatives analyzed would not meet most, or all, of the project objectives described in Chapter 3.0, Project Description, of the DEIR. Furthermore, the commenter does not provide any specific additional alternatives. No changes to the FEIR are required as a result of this comment.

As stated in response to comment Z-8 above, the roadway connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection.

April 14, 2017

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, Suite 1200
East Tower, MS 413
San Diego, CA 92101

Email to:

PlanningCEQA@sandiego.gov

Project: Serra Mesa Community Plan Amendment Roadway Connection Project
Project # 265605

Dear Environmental Planner,

Please accept this letter as formal opposition to the proposed project to the Serra Mesa Community Plan which proposes the construction of a roadway connector between Via Alta and Phyllis Place. I am a resident in Apex. I walk my dogs along Via Alta as well as walk with my grandchildren. The community is turning out to be a beautiful place to live. This connector will destroy the peaceful living we enjoy today.

There is no study that can dismiss the fact that putting a connector will:

- Increase negative air quality (exhaust pollution from cars, trucks, buses)
- Increase noise quality (a stream of noise from cars moving, braking and honking)
- Produce and increase traffic (walking across Via Alta, crossing Via Alta)
- Increase in parking issues with more traffic to the dog park
- Increase the incident of people (including canines) vs car accidents
- Decrease quality of life for residents in Civita
- Creating and increasing land erosion, runoff and flooding with a negative impact to the environment
- Increase safety risk with easier access to rob and go

I am absolutely against building the connector. I fail to see the benefit for any of the residents who live anywhere around it whether it be in Civita or Serra Mesa.

Respectfully submitted,



Elisa Danielson

8337 Summit Way
San Diego, CA 92108
908.202.2927
Elisa.danielson@aol.com

Letter AA: Elisa Danielson

AA-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding increased air pollution and noise from vehicles, increase in traffic that will make walking across Via Alta difficult, safety risks from “rob and go,” and runoff, as well as a decrease in parking and quality of life for residents of Civita.

Please see the response to comment O-1. This comment raises concerns related to air pollution, noise, traffic, safety risks, and decreased parking and quality of life, but does not specifically raise issue regarding the adequacy of the DEIR. Moreover, all the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. However, it should be noted that parking is not an environmental issue that is required to be analyzed under CEQA unless attributed to a specific physical impact on the environment. Please see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, 5.8, *Hydrology and Water Quality*, and 5.9, *Visual Effects and Neighborhood Character*, of the DEIR. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to noise and visual effects/neighborhood character. All other potential impacts were determined to be less than significant, including those related to air quality and hydrology/water quality.

The opinion of the commenter related to “a decrease in quality of life for residents in Civita” is a broad statement and is not an issue that is under the domain of CEQA unless it is attributed to a specific physical impact on the environment. The comment states opposition to the proposed project but does raise issue regarding the adequacy of the DEIR.

From: [Adam Bunn](#)
To: [PLN_PlanningCEQA](#)
Subject: Project Name (Serra Mesa Community Plan Amendment Roadway Connection Project) and Number (265605)
Date: Friday, April 14, 2017 11:15:58 AM

AB-1

Thank you for taking the time to put out the EIR for the Franklin Ridge connector project. As a home owner in the Origen development of the Civita Master Planned community I have some concerns. I will say that I understand the necessity of the connection to meet the Serra Mesa and Mission Valley community plans, the traffic relief it will provide to the Murray Ridge/I-805 area, and the increased ease given to emergency services trying to reach our neighborhood. I'm not opposed to the project, but I don't feel the items I am concerned about have been adequately addressed.

AB-2

My main concern is the increase in traffic to Via Alta between Franklin Ridge Rd and Civita Blvd. From page 5.2-21 of the EIR I see that traffic on this road segment (which runs right next to my section of the neighborhood) is projected to more than triple in the near term. This project would coincide with the opening of the Civita Rec Center and community park, both of which I and my family need to cross Via Alta in order to access. Just to the north of the driveway for Modern Oasis Drive, Via Alta curves to the left making it very difficult to see oncoming traffic for pedestrians trying to cross over to the park side of the road. Often drivers are clearing going above the 25 mph speed limit as it is a downhill with no stop signs or other speed mitigating apparatuses. Our only official options to cross the road are at the intersection of Civita Blvd and Via Alta, or at the current north end of Via Alta where there is no traffic coming south. There are a series of trails on the east side of Via Alta that lead to the park and the rec center that we'd like to take advantage of in the future, but would prefer to avoid walking to the top or the bottom of the hill to do so. Basically I foresee most of our community needing to cross the street more often and now there is going to be more traffic that will make it difficult to do so. What can you tell us or do for us in order to alleviate our concerns?

AB-3

The EIR also includes a section on the project effect on the character of the community (5.9.5), but it neglects to address the effects to the character of the Civita community. When we purchased our home we bought in to the idea of a tight knit, walkable community. It is my opinion that pedestrians are being considered a side issue to this road connector and that is what is most concerning to many of us living here. We're not Luddites looking to halt the march of progress. But we did have a vision for a community that many of us became emotionally attached to and would like to see that addressed. In the two years that we've lived here, we and many of our neighbors have had children and we see them walking through our neighborhood every day. We'd like to feel like our children will be safe crossing the street when they get old enough to do so on their own when they want to go play at the park or the pool. Why were these concerns not included in this section (5.9.5) of the EIR?

Thank you for your time,

Adam Bunn
7841 Modern Oasis Dr.
San Diego, CA 92108
(858) 736-5509

Letter AB: Adam Bunn

AB-1: The commenter indicates understanding for the necessity of the proposed roadway connection but has concerns regarding the project.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments AB-2 and AB-3 below.

AB-2: The commenter expresses that the main concern is the increase in traffic on Via Alta between Franklin Ridge Road and Civita Boulevard and its effect on pedestrian safety and access to the new Civita Recreation Center and community park east of Via Alta.

Please see the responses to comments F-4 and F-5.

AB-3: The commenter states that the DEIR neglects to address the effects of the proposed roadway connection on the character of the Civita community. The commenter also expresses concerns regarding walkability and pedestrian safety, and questions why these concerns were not included in Section 5.9.5 of the EIR.

Please see the responses to comments F-4, F-5, and R-1.

From: [Michelle Bunn](#)
To: [PLN_PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project (265605)
Date: Friday, April 14, 2017 9:32:22 AM

Dear Planning Committee,

I have lived in San Diego my entire life and can't imagine living anywhere else. My husband moved to San Diego over 16 years ago to attend college here. Growing up, his family moved a lot because his father was in the Army. Since moving to San Diego, he fell in love with our great city and refuses to live elsewhere. While we were saving up for a house, we lived in North Park, which many consider to be a walkable neighborhood to get to the grocery store, local restaurants and bars, and nearby parks. After living in North Park, we knew we wanted to live in another walkable neighborhood. In 2014, we came across an ad in the Union Tribune about an Open House for some model homes in the Civita Community. We decided to take a look and immediately fell in love with the location. The big selling point was the fact that it was going to be a walkable community! We were nothing but excited and knew right away that we needed to put in an offer before we lost out on the opportunity.

From April 2014-November 2014, we watched as a huge pile of dirt became our dream home. I will always remember that the day we moved in, I felt sluggish and really tired. I decided to take a pregnancy test, and to our surprise, I was pregnant! Fast forward to now, we have a very active 1.5 year old son who loves exploring our neighborhood, and especially when we walk our dog. Having lived in this community without the roadway connector, there are several cars who already speed up and down the roads. There have been a few times that our son has bolted from our grasp and we have been able to grab him and pull him back to the sidewalk. Since moving to the Civita community in 2014, we have seen so many families move in or start growing their families. With that, my concern is that our walkable community will become a frightful neighborhood where our hearts have to race every time our children cross the street or are playing nearby because the increased traffic from the roadway connector will only increase more cars speeding up and down that hill that goes through our community.

Please reconsider changing your decision to add the roadway connector for the sake of the safety of our families in our community. I want my child to be able to play safely in our community without having to worry about him getting hit by a car speeding up or down the road in a hurry to get to or from their destination. If you find that the roadway connector is absolutely necessary, I ask that you consider adding speed bumps or additional light-up pedestrian walkways so that drivers are aware that kids are at play and pedestrians are crossing the street. I love where we live and am excited to continue to grow my family here in this neighborhood, but need your help to keep us safe!

Sincerely,
Michelle Bunn

Letter AC: Michelle Bunn

AC-1: The commenter provides a personal history and reasons for purchasing a home in Civita. The commenter expresses general concerns regarding pedestrian safety and walkability, and requests that traffic calming and pedestrian safety improvements be considered.

Please see the responses to comments F-4, F-5, and W-1.

From: vaidosa73@aol.com
To: [PLN_PlanningCEQA](#)
Subject: OBJECTIONS TO THE FREEWAY CONNECTION THROUGH CIVITA
Date: Thursday, April 20, 2017 12:33:33 PM

I AM A HOMEOWNER WITHIN CIVITA. MY HUSBAND AND I HAVE A TWO YEAR OLD DAUGHTER. BEFORE SHE WAS BORN, WE LIVED IN A CONDO NEAR FASHION VALLEY MALL, WHERE IT WAS IMPOSSIBLE TO GET ANYWHERE WITHOUT WALKING NEAR ULRIC AND FRIARS ROAD.

WE MOVED TO CIVITA FOR SEVERAL REASONS, INCLUDING ITS WALKABLE ACCESS TO SHOPPING AND PUBLIC TRANSPORT WITHOUT HAVING TO BE ON BUSY STREETS SUCH AS FRIARS AND ULRIC FOR VERY LONG TO GET THERE.

THE CITY HAS CHANGED ITS PLANS FOR CIVITA NUMEROUS TIMES SINCE WE STARTED LOOKING INTO IT AND EVENTUALLY BOUGHT INTO CIVITA, INCLUDING ALLOWING FOR MUCH MORE DENSE DEVELOPMENTS, THAN ORIGINALLY PLANNED FOR

EVERYDAY I PUSH MY DAUGHTER, IN HER STROLLER, TO THE TROLLEY. WITH THE NEW ROAD ACCESS FROM FRIARS, ROAD, EVEN AT 7 AM, WHEN WE ARE WALKING, YOU CAN ALREADY SEE A BIG DIFFERENCE IN THE NUMBER OF VEHICLES DRIVING UP AND DOWN CIVITA BLVD AND VIA ALTA. THIS PROBLEM IS ONLY GOING TO EXPONENTIALLY WORSEN WITH ACCESS TO THE FREEWAY FROM CIVITA.

we HAVE THE PARK, WHICH IS ABOUT TO OPEN, WITH ITS RECREATIONAL CENTERS, THAT WOULD MAKE IT EASY FOR YOUNG CHILDREN, SUCH AS MY DAUGHTER, TO RUN OUT INTO THE STREETS, WITH ALL OF THE FREEWAY ACCESS TRAFFIC AND GET INJURED, IN A COMMUNITY WITH MANY YOUNG CHILDREN WHOSE PARENTS BOUGHT IN, SO THEIR CHILDREN COULD BE IN A PROTECTED COMMUNITY, NOT IN THE MIDDLE OF A SECOND FRIARS ROAD

FURTHERMORE, AT LAST LOOK A SCHOOL IS STILL SUPPOSED TO GO INTO THE CORNER OF CIVITA AND VIA ALTA. A SCHOOL WHERE MOST OF THE CIVITA RESIDENTS WILL WALK TO TO DROP OFF THEIR CHILDREN, WHICH WOULD BE IN THE MIDDLE OF WHAT WILL TURN INTO A BUSY, HEAVILY TRAVELED INTERSECTION, FURTHER RISKING DANGER TO THESE CHILDREN.

THE CITY HAS LIVED WITHOUT ACCESS TO THE LAND THAT CIVITA IS BUILT ON. THERE IS NO REASON TO NOW MAKE A BASICALLY TWO LANE ROAD, A MAIN HUB FOR FREEWAY ACCESS, THROUGH COMMUNITIES OF FAMILIES WITH CHILDREN.

IF SOMEHOW WE FOUND A FIELD MOUSE IN DANGER SADLY, THE CITY MIGHT WAKE UP AND PAY MORE ATTENTION AND PREVENT SUCH A CONNECTOR AS IT DID WITH CAMINO DEL RIO. PLEASE DON'T MAKE FIELD MICE MORE IMPORTANT THAN CHILDREN WHO WILL BE PLACED AT RISK IF THIS FREEWAY CONNECTION IS ALLOWED.

Carla

AD-1

Letter AD: Carla Vaidosa

AD-1: The commenter provides a personal history and reasons for purchasing a home in Civita. The commenter expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety, walkability, and additional traffic. The commenter also expresses concerns regarding the effects of additional traffic on the potential future school in Civita as it relates to safety.

Please see the responses to comments F-2 F-4, and F-5. Please also refer to Section 5.2, *Transportation and Circulation*, of the DEIR.

Letter AE

From: [Sarah Hancock](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project 265605
Date: Friday, April 21, 2017 1:37:43 PM

To Whom It May Concern,

I live in Civita and I would like to express my opposition to this project. I strongly feel it will ruin the community and cause our property values to fall. I purchased in this community largely for the feel I got every time I drove or walked around and I would never have considered it knowing there would be a project to connect this roadway. It's not necessary and will create congestion, noise and unwanted traffic flowing through our community. Please do not move forward with this project.

Sarah Hancock
Frame & Focus

AE-1

Letter AE: Sarah Hancock

AE-1: The commenter expresses opposition to the project and expresses the opinion that the project would ruin the [Civita] community and cause property values to fall. The commenter provides the opinion that the project would create traffic congestion, noise, and unwanted traffic.

Please see the responses to comments P-1 and R-1.

From: [Viviane Feilhaber](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048
Date: Tuesday, April 25, 2017 12:01:15 AM

Hello,

My name is Viviane Feilhaber. I am a resident and homeowner of Civita in Mission Valley. **I am opposed to the Franklin Ridge/Phyllis Place Freeway Road connection.**

As a homeowner, I value the neighborhood as a walkable community. Civita was master-planned to be filled with parks, trails, a community center, and greenery. This is what we were promised upon investing on purchasing a home in this city.

AF-1 | A freeway connector would absolutely undermine the value and importance of this neighborhood. It would be a betrayal to the vision of Civita, and to what was planned and originally designed. The walkability of Civita would be threatened, as different studies suggest traffic would increase by 2-10X current levels. The negative impact of a freeway connector - on homes that are designed to be very close to the street - would be significant and counter to the purposes of the master plan. These streets are not designed for heavy traffic as they were planned with a residential, walkable neighborhood in mind.

- AF-2 |
- If the plan moves forward, how will the City reconcile the impact of a freeway connector with the master plan of Civita as a residential, walkable neighborhood?
 - Does the plan currently consider, plan for, or address the fact that this street is not designed for heavy traffic?
- AF-3 |
- Were any alternative options for freeway connectors considered, which would not cause a substantial negative impact to a new, residential neighborhood?

Thank you,
Viviane Feilhaber

Letter AF: Viviane Feilhaber

AF-1: The commenter is a Civita homeowner and expresses opposition to the proposed roadway connection and its effects on the walkable community and opines that the roadways are not designed for heavy traffic.

Please see the responses to comments F-4 and F-5. In addition, two scenarios are analyzed: 2017 and 2035. In the 2017 scenario, several roadways in the project vicinity would see a decrease in traffic volume, whereas others would see an increase. However, only Murray Ridge Road, between Mission Center Road and Sandro Rock Road, and Phyllis Place, between the proposed project location and I-805 northbound ramp, would be significant. Under the 2035 scenario, growth would increase throughout the City and within the vicinity of the proposed project. As a result, traffic volumes would be much higher in general. No changes to the FEIR are required as result of this comment.

AF-2: The commenter questions if the DEIR considered whether the street is designed for heavy traffic.

The comment does not specify which streets the commenter believes are not designed to accommodate heavy traffic, but the traffic study area for the proposed project is defined in Section 5.2, *Transportation and Circulation*, of the DEIR and the potential impacts of the proposed roadway connection on the transportation facilities within the traffic study area are fully disclosed in the DEIR. As indicated in the DEIR, significant and unavoidable traffic impacts were identified along segments of Murray Ridge Road (2017 and 2035), Franklin Ridge Road (2035), and Rio San Diego Drive (2035) and at intersections Murray Ridge Road and Sandro Rock Road (2035), Murray Ridge Road and the I-805 Northbound and Southbound I-805 ramps (2035), and a design hazard associated with left turns from the existing City View Church parking lot due to its proximity to the proposed project intersection at Phyllis Place and the proposed roadway. No changes to the FEIR are required.

AF-3: The commenter questions whether any alternative options for freeway connectors were considered.

Please see Chapter 9, Alternatives, of the DEIR. It should also be noted that the proposed roadway connection is not a “freeway connector,” but rather provides a multi-modal connection between the Serra Mesa and Mission Valley communities. Alternative options for providing freeway ramp access were not considered; they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. No changes to the FEIR are required.

From: [Marta Rebella](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project
Date: Friday, April 28, 2017 11:10:53 AM

RE: No. 265605SCH No. 2012011048

AG-1

As a homeowner in Civita, Lucent, I am **opposed** to the roadway connection because it will have a negative effect on the lives of all of us that live in this community. Increase in traffic will take away from the peaceful usage of our community parks and home. The noise and toxic fumes from increased traffic will have a negative impact on our health and well being.

Marta Rebella
8432 Distinctive Drive
San Diego, CA 92108

Letter AG: Marta Rebella

AG-1: The commenter is a Civita homeowner and expresses opposition to the proposed roadway connection because of the belief it will have a negative effect on Civita. The commenter expresses the opinion that the increase in traffic will affect usage of community parks and result in increased noise and toxic fumes that will affect health and wellbeing.

Please see the responses to comments F-2, F-4, and F-5. This comment expresses opposition to the proposed roadway connection and raises concerns related to the increased traffic, usage of parks, noise, and vehicle emissions. The comment does not specifically raise issue concerning the adequacy of the DEIR. All of the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please refer to Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, and Chapter 7, *Effects Not Found To Be Significant* (for comments related to parks and recreation). Based on the impact analysis contained in the DEIR, the proposed project would result in less-than-significant construction noise impacts after mitigation and less-than-significant impacts related to air quality.

Letter AH

From: [Pat Phillips](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 201201104
Date: Saturday, April 29, 2017 2:25:08 PM

To Whom It May Concern:

AH-1

We are homeowners who reside within the new "walkable" Civita Community in Mission Valley. We downsized and moved back into the City so we could specifically live in a Civita - touted as a walkable, pedestrian-friendly community with a village vibe. The proposed connector road will destroy and undermine the entire concept/reality of Civita remaining a walkable, pedestrian friendly village. We adamantly **oppose** the approval and construction of any and all proposed connector roads through the Civita Community.

Please read and consider our below formal concerns and technical comments and questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection.

Thank you,

*Pat and John Phillips
8303 Distinctive Drive
San Diego, CA 92108*

AH-2

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector.

Last month the City recirculated 2016's Draft EIR proposal (Environmental Impact Report). This second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.

If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.

At what cost? At the degradation of Civita, an Urban Land Institute award winning planned "walkable" village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.

AH-2
(cont'd)

The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.

- Civita residents are not NIMBY's. They are the ones that bought into the City's progressive plan of communities for the future.
- When Civita owners bought their homes, the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa. Buyers were told the connector "likely won't happen."
- o the disclosure indicates, that the connector was a "possibility" not a definite. The 1985 Community Plan included the freeway connector as an "option" not a definite.
- The City has already factored this connector into their traffic studies for future growth in Mission Valley. It is apparent the City has planned for this connector all along, but Civita home owners were not informed of the City's true intention.
- Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street.
- There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school.
- There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allowed and because of access for emergency vehicles, speed bumps not allowed.
- Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.
- Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon

land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.

- The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?
- GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area.
- Easy ingress/ egress to Civita in multiple directions will increase the crime rate.

Freeway connectors do not belong within the residential district of Civita ... preserve the character and vision of Civita as San Diego's next walkable village by opposing the freeway connector.

AH-2
(cont'd)

Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with

significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.

- a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?
4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.
 - a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
 - b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?
5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:
 - Potential new public transit corridors to reduce vehicles;
 - Potential new Riverwalk trolley station and relocated trolley station at Mission;
 - Valley Center to increase ridership;
 - Potential new skyways to UCSD and University Heights;
 - Planned and potential new walking multi-use paths;
 - Planned and potential new cycling paths;

AH-2
(cont'd)

- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- Easy vehicular ingress/ egress in multiple directions increases crime rates;
- Proposed regional traffic impacts residential neighborhoods;
- Proposed regional traffic negatively impacts property values;
- Proposed regional traffic impacts tranquility, peace and quiet;
- Proposed regional traffic impacts nature, air quality and biology;
- The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a

↑ Smart Growth village focused on walkability and limited vehicle trips.

- Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
- Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).

**FREEWAY CONNECTORS DO NOT BELONG WITHIN THE WALKABLE
COMMUNITY OF CIVITA**

*Pat and John Phillips
Civita Residents and Homeowners*

AH-2
(cont'd)

Letter AH: Pat and John Phillips

AH-1: The commenter is a Civita homeowner and provides reasons for purchasing a home in Civita. The commenter expresses the opinion that the proposed roadway connection will undermine the concept of Civita remaining a walkable, pedestrian friendly village and expresses opposition to any connector roads through Civita.

Please see the responses to comments F-2, F-4, and F-5. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

AH-2: The commenter repeats information from Letter F (Save Civita). Please see the response to comment F-2.

AH-3: The commenter expresses the opinion that freeway connectors do not belong within the residential district of Civita and makes a statement to preserve the character and vision of Civita by opposing the freeway connector.

Please see the response to comment R-1 for comments related to community character, as well as Section 5.9, *Visual Effects and Neighborhood Character*, of the DEIR. It should be noted that Civita is not solely a residential district; the Civita development is proposed to include 4,780 residential units, 603,000 square feet of retail space, and 620,000 square feet of office/business park uses (amongst other uses). In addition, the proposed roadway connection is not a “freeway connector,” but rather provides a connection between the Serra Mesa and Mission Valley communities. The objectives of the proposed project are outlined in Section 3.1 of Chapter 3, *Project Description*, of the DEIR. As described in Chapter 3, the objectives of the proposed project include resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and ensuring the proposed project is safe for motorists, cyclists, and pedestrians.

AH-4: The commenter repeats information from Comment Letter F (Save Civita). Please see the responses to comments F-3 through F-10.

AH-5: The commenter concludes the letter by stating that freeway connectors do not belong with the walkable community of Civita.

Please see the responses to comments F-4, F-5, and R-1. The comment raises general issues related to walkability and states opposition to the proposed project, but does not specifically raise issue regarding the adequacy of the DEIR.

Letter AI

From: [Zone fun](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Saturday, April 29, 2017 11:44:01 AM

AI-1

Thanks,
Raffa

Letter AI: Raffa

AI-1: The commenter requests that the Serra Mesa Community Plan Amendment Roadway Connection Project be rejected.

Please see the response to comment F-2. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter AJ

From: [Rafael Patino](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Saturday, April 29, 2017 11:39:24 AM

AJ-1

Thanks,
Raffa

Letter AJ: Raffa Patino

AJ-1: The commenter requests that the Serra Mesa Community Plan Amendment Roadway Connection Project be rejected.

Please see the response to comment F-2. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter AK

From: [Rafael Patino](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Saturday, April 29, 2017 11:48:29 AM

AK-1

Thank you!
Raffael Patino

Letter AK: Raffael Patino

AK-1: The commenter requests that the Serra Mesa Community Plan Amendment Roadway Connection Project be rejected.

Please see the response to comment F-2. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter AL

From: [Salssa Patino](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Saturday, April 29, 2017 11:29:41 AM

AL-1

Thanks,
Raffa

Letter AL: Salssa Patino

AL-1: The commenter requests that the Serra Mesa Community Plan Amendment Roadway Connection Project be rejected.

Please see the response to comment F-2. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter AM

From: [Anne Khong](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Roadway Connection Proj No. 265605 SCH No. 2012011048
Date: Saturday, April 29, 2017 7:07:41 PM

Dear City Planning Official,

I was dismayed to hear that the City intends to go ahead with turning Via Alta and Franklin Ridge roads into freeway connectors linking Mission Valley to Serra Mesa to allow access to the 805 freeways. There are already established connectors from Mission Valley to Serra Mesa. Via Alta would essentially parallel Mission Center Road leading to Serra Mesa. If you have not done so yet, please take the time to come observe how residents use this road. Strollers, pets on leashes, pedestrians walking for exercise abound. While you are here, consider putting yourself in our shoes and think for a minute of the kind of community living the residents here envision and currently enjoy. The charm and appeal of Civita is that it is a walkable, safe, modern community. It is the jewel of Mission Valley! It is a neighborhood that will bring Mission Valley much acclaim and make it a model community to be emulated in other up and coming communities! It is the master planned community of the future showcased right here in Mission Valley! Don't degrade and spoil the intended character of the community with busy freeway connector roads. There is a dog park at the top of Via Alta near Franklin Ridge Road. Pet owners from throughout the community will be walking up there with their pets and young children. Making those 2 streets freeway connector streets will make it significantly more dangerous for pedestrians. Via Alta is especially steep and cars will be flying down that street, especially folks who have no regard for the community and are using the street simply to connect to 805.

Please reject the proposal to make Via Alta and Franklin Ridge connector roads between Mission Valley and Serra Mesa.

Thank you.

Anne Khong

AM-1

Letter AM: Anne Khong

AM-1: The commenter expresses opposition to the proposed project and expresses the opinion that the project would negatively impact the charm and appeal of the Civita neighborhood with a freeway connector.

Please see the response to comment R-1. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: [Jennifer Kolde](#)
 To: [PLN_PlanningCEQA](#)
 Subject: Serra Mesa Community Plan Amendment Roadway Connection Project - Project #265605
 Date: Saturday, April 29, 2017 1:22:04 PM

Dear Sir / Madam,

I am writing to provide public comment on the proposed **Serra Mesa Community Plan Amendment Roadway Connection Project - Project #265605**, specifically the recirculated draft published on March 29, 2017.

AN-1

As a resident of Civita, I would like to note that **I object to / disagree with** the proposed street connection from Phyllis Place in Serra Mesa to Via Alta / Franklin Road in Civita / Mission Valley. My objections are based on the following:

AN-2

1. Increased traffic flow. Via Alta is a two-lane (one lane each direction) road. It was **not designed to accommodate the heavier traffic flow** anticipated by the proposed connector. It is not feasible to widen the road. Even if it were feasible, widening the road would significantly alter the character of the Civita neighborhood. The increased traffic will lead to congestion that the road was not built to handle and cannot be modified to accommodate.

AN-3

2. Increased traffic hazard to drivers. Via Alta is a winding road with landscaping to either side as well as a landscaped median. These features already **limit visibility** along the road. There are numerous entries / exits to the road from the various residential developments along Via Alta. The road is **intended as a residential connector with low / limited speeds**.

Commuters using Via Alta as a pass through to and from I-805 are unlikely to respect the speed limit, leading to **increased hazards for drivers along the route**.

AN-4

3. Increased traffic hazard to pedestrians. The Civita neighborhood has been promoted as highly walkable, and residents of both Civita and San Diego frequently use the area to enjoy walks, including with pets, children, and babies / strollers. There are no pedestrian crosswalks along Via Alta except at the top (Franklin Ridge) and bottom (Civita Blvd) of the road. Pedestrians **regularly cross Via Alta at non-crosswalk locations** out of convenience. Pedestrian traffic will **continue to increase** as Civita gains residents and businesses, and as residents of the surrounding area come to enjoy Civita public spaces such as parks. There will be a **significant increase in pedestrian traffic across Via Alta** when the Civita Community Center opens in Summer 2017 and residents walk to the center. **Pedestrians will be placed at significant increased risk from the increased traffic from the connector.**

AN-5

4. Character of the neighborhood. Civita has been promoted as a model of high-density living, something that is required going forward to accommodate population growth and support for infrastructure and city services in San Diego for the future. A key feature of that high-density living is the "walkability" of the neighborhood. This limits "sprawl" and reduces traffic and air pollution by allowing residents to walk to parks, shops, businesses, and entertainment as opposed to driving. **Increased traffic from the connector will reduce this "walkability" and go against Civita's original purpose.**

AN-6

5. The connector is not necessary. Traffic congestion and freeway access in San Diego are concerns for future civic planning. However, **Mission Center Road already connects**

AN-6
(cont'd)

↑ **Mission Valley / Friars Road to Serra Mesa and the I-805.** This route is designed for heavier traffic (four lanes) and routes through a canyon as opposed to a residential area. Many commuters - including myself - routinely use this route, which is **not** currently exceeding capacity or subject to excessive traffic. An additional north-south connector less than a mile away will cause significant problems without any meaningful gain.

Based on the concerns above, I strongly encourage the Planning Department to consider the following alternatives:

1. Allow Mission Center Road to remain the primary north-south connector between Mission Valley and Serra Mesa near the I-805. The road can accommodate the additional traffic without disrupting the Civita neighborhood around Via Alta and creating traffic hazards for drivers and pedestrians both.

AN-7

2. Consider a connector further east that does not make use of Via Alta. Via Alta has already been constructed and cannot be modified from its current state. Other parts of Quarry Falls remain undeveloped where plans for those areas can still be modified. A north-south road could be built with appropriate traffic lights, pedestrian crossings, and / or speed bumps to address concerns about traffic flow and hazards without the added risks and hazards that would come from using Via Alta.

Construction of the connector will cause significant risk and disruption along Via Alta and should not be approved.

Thank you for your consideration.

Respectfully,
Jennifer Kolde
San Diego

Letter AN: Jennifer Kolde

AN-1: The commenter expresses opposition to the proposed project and cites increased traffic, alleged increased traffic hazards at Via Alta, alleged traffic hazards to pedestrians, a change in the existing neighborhood character, and alleges that the connector is not necessary.

This comment notes the author's general opposition to the project, but the specific reasons are provided in the responses to comments AN-2 through AN-7 below. Please see the responses to the specific comments following this general response. No further response is needed for this general comment expressing opposition to the proposed project.

AN-2: The commenter expresses an opinion that Via Alta would be forced to contain traffic quantities it was not built to handle, and that it is not feasible to widen this road to accommodate the increased traffic.

As discussed in Section 5.2, *Transportation and Circulation*, the proposed project would not result in road segment impacts to Via Alta, and therefore, it would not be required to be widened. The proposed project would result in a long-term (year 2035) potentially significant impact to the intersection of Via Alta and Franklin Ridge Road in the PM peak hour (Impact TRAF-18). However, with the implementation of mitigation measure MM-TRAF-18, the potentially significant impact would be mitigated to a less-than-significant impact. No further impacts to Via Alta were identified by the DEIR, and no changes to the FEIR are required as a result of this comment.

AN-3: This comment expresses concerns about the limited visibility along Via Alta, and the potential for increased traffic from the proposed project to result in increased traffic hazards to drivers along Via Alta. This comment also includes concerns that drivers will not abide by posted speed limits, leading to increased hazards.

Please see the response to comment O-1. Furthermore, as analyzed in Section 5.2, *Transportation and Circulation*, the proposed project does not include any hazardous design features on Via Alta that would result in dangerous conditions for drivers, except for the significant and unavoidable impact at the driveway of City View Church, due to the insufficient sight distance from the driveway to the intersection at Phyllis Place (Impact TRAF-19). However, it should be noted that the City will continue to coordinate with whomever the applicant of the proposed project is and with the City View Church to ensure the safe egress of vehicles from the City View Church driveway. The analysis within the DEIR assumes that mitigation measure MM-TRAF-19 would not be implemented, as the City cannot enforce a mitigation measure onto a private property (City View Church). However, the City will continue to work with the ultimate developer of the roadway and the private entities (City View Church) on potential solutions to improving eastbound traffic leaving the City View Church parking lot. In addition, the proposed project would not impact the existing design features, including speed limit, of the existing road Via Alta. No revisions to the FEIR are warranted as a result of this comment.

AN-4: The comment includes concerns about the potential hazards to pedestrians attempting to cross Via Alta.

Please see the responses to comments F-4 and F-5.

AN-5: The comment expresses concern about the effect on neighborhood character as a result of the proposed project. The comment indicates the increased traffic would reduce the walkability of the Civita neighborhood.

Please see the responses to comments F-4, F-5, and R-1.

AN-6: The commenter expresses an opinion that the connector is not necessary and that Mission Center Road already connects Mission Valley/Friars Road to Serra Mesa and the I-805.

Alternative options to the proposed roadway connection for providing a connection between the Serra Mesa and Mission Valley communities were not considered; they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. This comment does not specifically raise issue regarding the adequacy of the DEIR, so no changes to the FEIR are required as a result of this comment.

AN-7: The commenter suggests two alternatives for the Planning Department to consider: allow Mission Center Road to remain the primary north-south connector between Mission Valley and Serra Mesa near the I-805, and consider a connector further east that does not make use of Via Alta.

Please see the response to comment AN-6.

From: [Hector Hernandez](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Sunday, April 30, 2017 9:43:33 PM

To whom it may correspond,

I think the freeway connection project can destroy the lives of the families in Civita. Civita is walkable community, where you can take your kids and dogs to the park. The speed and flow of the cars of the connector will destroy the main purpose of Civita, which in a walking community. We should be encouraging our children and generations to come to walk more, and use the car less. The pedestrians right should be before the rights of the cars. I hope you can find a better alternative for the freeway connector. Yours Truly,

--

Héctor Constancio Hernández Hernández
Hernandez Consultores y Asociados S.C
Pedro Moreno 1299 Col. Americana
Tel 38263635 38253605
Cel 0443338158715

hectorhh87@gmail.com

AO-1

Letter AO: Hector Hernandez

A0-1: The commenter expresses opposition to the proposed project and expresses an opinion that walking more and driving less should be encouraged.

Please see the responses to comments F-2 and F-4. In addition, the proposed project would reduce VMT, resulting in less vehicle-related emissions (see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, and 5.10, *Greenhouse Gas Emissions*, of the DEIR). The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter AP

From: [Kevin Khusial](#)
To: [PLN PlanningCEQA](#)
Subject: Save CIVITA
Date: Sunday, April 30, 2017 8:29:55 AM

To whom it may concern:

AP-1

As a resident of Civita I am strongly opposed to a freeway connector which will transform two of our main streets into freeway connectors. Our community is highly prided on the fact that it is walkable and safe. This connector would cause an enormous influx of traffic which will negatively impact our safety. With future plans for a school, walkable trails and a dog park that's accessible by foot, the thousands of cars which are estimated to pass through our community would completely change our community for the worse.

I implore you to reject this entire proposal. We take great pride in our community and we want to keep it the way it is.

Thank you

Kevin Khusial
[917-476-6805](tel:917-476-6805)

Sent from my iPhone

Letter AP: Kevin Khusial

AP-1: The commenter generally expresses opposition to the proposed project and generally alleges that the roadway would cause an enormous influx of traffic which will negatively impact safety.

Please see the responses to comments F-4 and R-1. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: [PATRICIA DAY-PHILLIPS](#)
 To: [PLN_PlanningCEQA](#)
 Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 201201104
 Date: Sunday, April 30, 2017 2:21:53 PM

To Whom It May Concern:

AQ-1

We are homeowners who reside within the new "walkable" Civita Community in Mission Valley. We downsized and moved back into the City so we could specifically live in Civita - touted as a walkable, pedestrian-friendly community with a village vibe. The proposed connector road will destroy and undermine the entire concept/reality of Civita remaining a walkable, pedestrian friendly village. We adamantly **oppose** the approval and construction of any and all proposed connector roads through the Civita Community.

Please read and consider our below formal concerns and technical comments and questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection.

Thank you,

Pat and John Phillips
[8303 Distinctive Drive](#)
[San Diego, CA 92108](#)

Our Formal Concerns/Issues:

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector.

Last month the City recirculated 2016's Draft EIR proposal (Environmental Impact Report). This second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.

AQ-2

If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is that this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.

At what cost? At the degradation of Civita, an Urban Land Institute award winning planned "walkable" village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.

- The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. **This community cannot successfully serve two diametrically**



opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.

- Civita residents are not NIMBY's. We are the ones that bought into the City's progressive plan of communities for the future.
- When Civita owners bought their homes, the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa.
- Buyers were told the connector "likely won't happen."
- The disclosure indicates that the connector was a "possibility" not a definite. The 1985 Community Plan included the freeway connector as an "option" not a definite.
- The City has already factored this connector into their traffic studies for future growth in Mission Valley. It is apparent the City has planned for this connector all along, but Civita home owners were not informed of the City's true intention.
- Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street.
- There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school.
- There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allowed and because of access for emergency vehicles, speed bumps not allowed.
- Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.
- Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.
- The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?
- GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area.

AQ-2
(cont'd)

- Easy ingress/ egress to Civita in multiple directions will increase the crime rate.

Freeway connectors do not belong within the residential district of Civita. Please preserve the character and vision of Civita as San Diego's next walkable village by Rejecting Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. [201201104](#)

Our Formal Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed

AQ-2
(cont'd)

↑
grade school?

- e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.

- a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
- b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:

- Potential new public transit corridors to reduce vehicles;
- Potential new Riverwalk trolley station and relocated trolley station at Mission;
- Valley Center to increase ridership;
- Potential new skyways to UCSD and University Heights;
- Planned and potential new walking multi-use paths;
- Planned and potential new cycling paths;
- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

↓ Additional comments as to why the Serra Mesa Community Plan Amendment Street

AQ-2
(cont'd)

↑ Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- Easy vehicular ingress/ egress in multiple directions increases crime rates;
- Proposed regional traffic impacts residential neighborhoods;
- Proposed regional traffic negatively impacts property values;
- Proposed regional traffic impacts tranquility, peace and quiet;
- Proposed regional traffic impacts nature, air quality and biology;
- The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
- Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
- Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a

AQ-2
(cont'd)



AQ-2
(cont'd)

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school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).

**FREEWAY CONNECTORS DO NOT BELONG WITHIN THE WALKABLE
COMMUNITY OF CIVITA.**

Please Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. [201201104](#)

Pat and John Phillips
Civita Residents and Homeowners
Sent from my iPhone

Letter AQ: Pat and John Phillips

AQ-1: The commenter is a Civita homeowner and provides reasons for purchasing a home in Civita. The commenter expresses the opinion that the proposed roadway connection will undermine the concept of Civita remaining a walkable, pedestrian friendly village and expresses opposition to any connector roads through Civita.

Please see the responses to comments F-4, F-5, and R-1. This comment expresses opposition to the proposed roadway connection and raises general concerns regarding walkability, but does not specifically raise issues concerning the adequacy of the DEIR.

AQ-2: The commenter repeats information from Comment Letter F (Save Civita). Please see the response to comment F-2.

AQ-3: The commenter expresses the opinion that freeway connectors do not belong within the residential district of Civita and makes a statement to preserve the character and vision of Civita by rejecting the proposed project.

Please see the responses to comments R-1 and AH-3.

AQ-4: The commenter repeats information from Letter F (Save Civita). Please see the responses to comments F-3 through F-10.

AQ-5: The commenter concludes the letter by stating that freeway connectors do not belong with the walkable community of Civita and requesting that the proposed project be rejected.

Please see the responses to comments F-2 and F-4. The comment raises general issues related to walkability, but does not specifically raise issue regarding the adequacy of the DEIR.

Letter AR

From: [Elizabeth Rush](#)
To: [PLN_PlanningCEQA](#)
Subject: Concerned for Children... Civita Resident
Date: Tuesday, May 02, 2017 6:44:35 AM

To Whom it May Concern,

I am a resident homeowner in Civita (Altana) born and raised in San Diego and I have lived in Mission Valley for 15 years. We bought in Altana because of the walkability of the neighborhood and the fact it would be a great safe place away from the traffic of Mission Valley to raise a baby (we just had a baby in May).

AR-1

The new proposed 805 Freeway connector goes against everything we liked about the neighborhood when we decided to buy. There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. I believe more traffic (which is unavoidable with the connector is built) will make it dangerous for us to cross the street safely. We are excited that there are negotiations to get a school in the community. None of the maps we looked at (and we looked carefully, my husband is in the residential real estate finance business!) showed a connector to the freeway above us.

AR-2

With that in mind, and knowing no fewer than 10 families with tiny children just in Civita's Altana alone...I fear that fast cars will be zooming by dozens of K-5 children as they walk to school from their homes on a very narrow street. Most elementary schools are built within a residential neighborhood on purpose, to protect them as they walk to school. We thought this was what Civita was going to be, too, for our son.

Please reconsider the safety of our children. Civita is a NEIGHBORHOOD ...not a thoroughfare. No connector to the 805 at Civita's children's expense!

Kind Regards,

[Elizabeth Rush](#)
[Academy Coordinator](#)

[Clairemont High School](#)
[4150 Ute Drive](#)
[San Diego, CA 92117](#)

Letter AR: Elizabeth Rush

AR-1: The commenter is a Civita homeowner and provides personal history and reasoning for purchasing a home in Civita. The commenter expresses general concerns regarding the increase in traffic making it dangerous to cross Via Alta. The commenter is also concerned for the children's safety that will be walking to the (future) school and expresses opposition to the proposed roadway connection.

Please see the responses to comments F-2, F-4, and F-5. This comment is expressing opposition to the proposed project and does not raise issue regarding the adequacy of the DEIR.

Letter AS

From: [Ida Rose Florez](#)
To: [PLN_PlanningCEQA](#)
Cc: [Rick Florez](#)
Subject: Support for Serra Mesa Community Plan Amendment Roadway Connection Project and 265605
Date: Tuesday, May 02, 2017 11:48:56 AM

Susan Morrison
Environmental Planner
City of San Diego Planning Department, 1010
2nd Avenue, Ste. 1200, East Tower, MS 413
San Diego, CA 92101

Dear Ms. Morrison,

I am a resident of Civita. My husband, Rick Florez (copied on this email), and I bought our condo in Origen four years ago and moved in Dec 2013. We are very pleased with the thoughtful way our community has been planned and developed. It is a joy to see it evolving into the kind of neighborhood we had envisioned when we bought our home. I am also a native San Diegan who had lived in other states for 25 years, before moving home in 2013. I was thrilled to be able to buy a new home, in such a beautiful community, centrally located, and near my aging mother.

As someone who, as a child, learned to ride a horse in Mission Valley, and who has witnessed 50 years of over-development in the area, I realize that the benefits and privilege of living in Civita must be balanced with the needs of the greater San Diego community. I believe it is my responsibility, as a citizen of San Diego, to not only consider what benefits me, but also what benefits the greater good.

AS-1

That said, I also believe the connector will not only benefit traffic flow in Mission Valley, but will enhance Civita as well. I am concerned that if the connector is not built there will be traffic flow and safety problems at Civita Blvd & Via Alta, especially after the school is opened. As a career educator, I care deeply about the safety of the children who will attend our community's school. Having an outlet at the top of Civita will provide a way for morning commuters to avoid student drop-off traffic.

For these reasons, I want to express my support for the proposed connector linking Civita with Serra Mesa. Many of our neighbors oppose the connector, and we respect their opinions and their right to express them. For several months we have listened to their concerns and arguments. After thoughtful consideration, we disagree with their position, and want the city council to be aware there are Civita homeowners who support the connector project and believe it will not only benefit the Mission Valley community, but that it will ultimately enhance Civita as well.

Thank you,

Ida Rose Florez, Ph.D.
7803 Stylus Drive
San Diego, CA 92108

Letter AS: Ida Rose Florez, Ph.D.

AS-1: The commenter is a resident of Civita and expresses support for the proposed roadway connection and concerns regarding traffic flow and safety if the proposed roadway is not constructed.

This comment is expressing support for the proposed project and does not raise issue regarding the adequacy of the DEIR.

From: [linda mccormick](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Roadway Connector
Date: Wednesday, May 10, 2017 8:34:03 AM

AT-1

I am writing to request that you reject the Serra Mesa Community Plan Amendment Roadway Connector Project No. 265605 SCH No 2012011048. I support the legal arguments that have been advanced against the amendment. Additionally, the connector threatens the “walkable” atmosphere of this middle income community and will create a dangerous situation for the people who live here.

Respectfully,

Linda McCormick
7848 Civita Blvd.
San Diego, CA 92108

Letter AT: Linda McCormick

AT-1: The commenter expresses opposition to the proposed project and raises general concerns related to the walkability and safety of the community.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general concerns related to walkability and safety of the community, but does not specifically raise issue regarding the adequacy of the DEIR.

From: [Roslyn Ofalla](#)
To: [PLN PlanningCEQA](#)
Subject: (Serra Mesa Community Plan Amendment Roadway Connection Project) Number (265605)
Date: Thursday, May 11, 2017 8:57:38 AM

To Whom it May Concern,

As a Civita resident/homeowner, I am opposed to the freeway connector being made. It will create unwanted traffic and congestion that can pose a danger to our walkable community. I am a mother of soon-to-be two children and my husband and I walk around the neighborhood often with our baby (soon-to-be two babies). We currently feel safe walking the streets in our neighborhood since there are not very many cars that drive through or pass by. However, if you create the connector, you will be taking that safety away from our family and our community because it will create more potential for accidents or pedestrians getting hit by cars.

AU-1

I understand there must be reasons on your part that the freeway connector is being made. Thus, if it truly does have to happen, please make sure to create extra safety measures, such as crosswalks with blinking lights and so forth. Please help to maintain the safety of Civita residents by either not making the freeway connector or by implementing the necessary safety features needed if the freeway connector is to be made. This way we can continue to be the walkable community that we were originally promised by the builders.

I hope you will do what is best for us Civita residents/homeowners. Thank you for your time and consideration in reading my letter.

Best,

Roslyn Ofalla

(Frame & Focus)

Letter AU: Roslyn Ofalla

AU-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding additional traffic and congestion, walkability, and pedestrian safety. The commenter requests that pedestrian safety measures be implemented in the neighborhood if the project is implemented.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general concerns related to traffic and congestion, walkability, and pedestrian safety, but does not specifically raise issue regarding the adequacy of the DEIR. Please also see Section 5.2, *Transportation and Circulation*, of the DEIR for the impact determinations regarding vehicle delay.

Letter AV

From: [Del Esposito](#)
To: [PLN PlanningCEQA](#)
Cc: [Roslyn Ofalla](#)
Subject: Re: (Serra Mesa Community Plan Amendment Roadway Connection Project) Number (265605)
Date: Thursday, May 11, 2017 9:23:27 AM

To Whom it May Concern,

As a Civita resident/homeowner, I am opposed to the freeway connector being made. It will create unwanted traffic and congestion that can pose a danger to our walkable community. I am a father of soon-to-be two children and my husband and I walk around the neighborhood often with our baby (soon-to-be two babies). We currently feel safe walking the streets in our neighborhood since there are not very many cars that drive through or pass by. However, if you create the connector, you will be taking that safety away from our family and our community because it will create more potential for accidents or pedestrians getting hit by cars.

AV-1

I understand there must be reasons on your part that the freeway connector is being made. Thus, if it truly does have to happen, please make sure to create extra safety measures, such as crosswalks with blinking lights and so forth. Please help to maintain the safety of Civita residents by either not making the freeway connector or by implementing the necessary safety features needed if the freeway connector is to be made. This way we can continue to be the walkable community that we were originally promised by the builders.

I hope you will do what is best for us Civita residents/homeowners. Thank you for your time and consideration in reading my letter.

Best,

Delfin Esposito

(Frame & Focus)

Letter AV: Delfin Esposito

AV-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding additional traffic and congestion, walkability, and pedestrian safety. The commenter requests that pedestrian safety measures be implemented in the neighborhood if the project is implemented.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general concerns related to traffic and congestion, walkability, and pedestrian safety, but does not specifically raise issue regarding the adequacy of the DEIR. Please also see Section 5.2, *Transportation and Circulation*, of the DEIR for the impact determinations on traffic.

From: [John Lahr](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Thursday, May 11, 2017 4:15:02 PM

AW-1

My wife and I are current residents of the Frame and Focus development of Civita. We purchased our townhouse with the clear expectation that it would be and remain a “walkable” community as it had been advertised by the developer. I will begin with some statements that reflect our feelings about the Roadway Connection Project followed by some questions that I ask be answered;

AW-2

- The City recirculated 2016’s Draft EIR proposal (Environmental Impact Report). This 2nd report continues to indicate that traffic volume within Civita on Via Alta and soon Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita’s residential district. If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is designed to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.

AW-3

- If this connector project proceeds, it will severely degrade Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community’s walkability, pedestrian safety, village character, and environmental quality.
- City leaders, planners and future thinkers have indicated to accommodate future growth, residents need to live in highly dense communities. Civita was designed for exactly that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. This community cannot successfully serve two opposite purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.

AW-4

- Civita owners are assessed monthly fees to pay for the new Civita Park that is open to the public. The Civita maintenance assessment district is funded by these monthly charges of about \$200 to \$300 per housing unit. Adding up to \$600,000 in operational and maintenance cost with the City adding only a small percentage of \$60,000 per year.
 - The freeway connector will lower home values and create instability in the Civita housing market. This will put a greater burden on the owners who must pay for the public park in addition to lower home values.

AW-5

- Civita is a thriving, growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler’s hands, etc. There is constant movement, up and down Via Alta now and soon will be the case with Franklin Ridge. There are no pedestrian crossings along Via Alta other than at Civita Blvd and that will hold true for Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely thus cutting off access for over 1,000 residents to Civita Park and the Recreation Center.



AW-5
(cont'd)

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- GPS mapping and routing programs will indicate that the route through Civita is the shortest and fastest way for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential neighborhood.

AW-6

- There are few options to manage traffic speeds and to allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not feasible and because of access for emergency vehicles, speed bumps are not allowed. Residential units line both sides of Via Alta as will be the case for Franklin Ridge in the future. The homes on the sides of these streets has front doors, porches, balconies, and bedrooms that are no more than 10 to 15 feet from the street. Increased traffic is sure to create more noise, pollution and a lower quality of life.

AW-7

- Increased traffic through Civita in multiple directions will likely lead to increased crime rate.

Questions that we have related to this matter:

AW-8

- The Mission Valley Community Plan states on page 55, “Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.” The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

AW-9

- Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile distance along Via Alta between pedestrian crossings at Civita Blvd and in the future Franklin Ridge Road. There is a 0.5-mile distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.

AW-9

- Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
- Did the Draft EIR review pedestrian crossings on Via Alta and for the future on Franklin Ridge Road?
- Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and also for the future Franklin Ridge Road?
- Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita’s recreational center and Civita’s other common areas?
- How does the Draft EIR address pedestrian safety within a walkable community such as Civita?

AW-10

The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.

- Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
- When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity?
- If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

AW-11

- Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley? The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

We appreciate the opportunity to respond to the DRAFT EIR and wish that you would take all of the provided information into consideration in coming to your final recommendation.

John and Anne-Marie Lahr

2410 Aperture Circle

Letter AW: John and Anne-Marie Lahr

AW-1: The commenter expresses opposition to the proposed project in this introductory statement.

This comment expresses opposition to the proposed project but does not address the adequacy of the DEIR.

AW-2: The commenter believes that the project's main goal is alleviate regional traffic congestion within Mission Valley by introducing an additional road connection to the I-805 freeway ramps on Phyllis Place.

Please see the project objectives listed on page 3-1 of Chapter 3, *Project Description*, of the DEIR. One of the objectives of the proposed project is to alleviate traffic congestion and improve navigational efficiency to and from the local freeway on- and off-ramps for the surrounding areas. In addition, however, are other important objectives, including improving local mobility to and from the Serra Mesa and Mission Valley communities, improving emergency access between Serra Mesa and Mission Valley, eliminating an existing inconsistency between the community plans for Serra Mesa and Mission Valley, and ensuring the proposed project is safe for motorists, cyclists, and pedestrians. Although the commenter believes that the main goal of the project is not what is stated within the DEIR, it does not specifically raise an issue regarding the adequacy of the DEIR.

AW-3: The commenter believes that the proposed project would degrade Civita, which includes a planned development of up to 4,500 dwelling units and 1.2 million square feet of retail and office, by redistributing heavy volumes of non-stop regional traffic, which would diminish the community's walkability, pedestrian safety, village character, and environmental quality.

Please see the response to comment AH-3. As the comment notes, at buildout the Civita development will include a substantial number of dwelling units, office space, and commercial space, all of which will itself generate a substantial amount of traffic, as discussed within the Quarry Falls PEIR. With the connection, traffic coming to and from Civita would have additional local and regional access options. Although this comment generally states opposition and what the commenter believes will occur under project implementation, it does not specifically raise an issue regarding the adequacy of the DEIR.

AW-4: The commenter believes that the proposed project would lower home values in Civita and suggests Civita owners will be under additional burden.

The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. Please see the response to comment F-2.

AW-5: The commenter believes the proposed project would make crossing streets unsafe.

Please see the responses to comments F-4 and F-5.

AW-6: The commenter believes the increased traffic will create more noise at nearby homes.

The noise analysis is contained within Section 5.4, *Noise*, of the DEIR, and Appendix E, Noise Assessment, of the DEIR. As indicated in Section 5.4, the project would not result in any significant and unavoidable noise impacts after the roadway is constructed. With mitigation, the construction

of the proposed project would reduce potential impacts to less than significant (see MM-NOI-1). No changes to the FEIR are necessary as a result of this comment.

AW-7: The commenter believes the project would lead to an increase in crime.

Please see the response to comment O-1.

AW-8: The commenter quotes a policy in the Mission Valley Community Plan that indicates that streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.

Please see the response to comment G-4.

AW-9: The commenter notes the distance of the existing road crossings in the Civita neighborhood and believes the additional traffic volumes will present a danger to pedestrians and lists several questions related to pedestrian safety.

Please see the responses to comments F-4 and F-5.

AW-10: This comment is similar to comment F-3. Please see the response to that comment.

AW-11: The commenter quotes a policy in the Mission Valley Community Plan that indicates streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.

Please see the response to comment G-4.

From: [Thomas Ramet](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Thursday, May 11, 2017 5:05:35 PM

Dear reader,

We are residents of Civita and we are very concerned about the plan to build a freeway connector in the heart of our neighborhood.

When my wife and I decided to purchase a home back in October 2016 we visited only 1 single house. You guessed it, it was the one in Civita. We literally fell in love with the idea of living an urban life. But most of all, what struck us was the peaceful atmosphere and how quiet this neighborhood is. We couldn't ask for more and decided to buy our first home. As you probably know, this comes with a lot of sacrifices for a young couple like us. But we were ready to take some risk in order to be able to raise a family in a safe environment.

Today we enjoy walking up and down the streets, going to the park to exercise or simply stay on our balcony to have some quality time.

We live on Inception way, a few yards away from Via Alta, which we can see from our balcony.

This connection project would ruin everything for us and our neighbors. High traffic would bring noise, pollution, danger and even crime.

Please do not bring the highways closer to our homes and keep Civita a quiet and peaceful neighborhood.

Finally, we are asking you to please let us know which steps are being taken to make sure that our rights as homeowners & California residents will not be violated.

Best regards
Laure E. & Thomas R.

AX-1

Letter AX: Laure E. & Thomas R. Ramet

AX-1: The commenter is a Civita homeowner and expresses concern about building a freeway connector in the neighborhood. The commenter provides a personal history and reasons for purchasing a home in Civita. The commenter expresses general concerns regarding increased traffic, noise, pollution, danger, and crime.

Please see the response to comment O-1. This comment raises concerns related to increased traffic, noise, pollution, danger, and crime, but does not specifically raise issue regarding the adequacy of the DEIR. Additionally, the commenter has not provided any substantial evidence as to how a roadway connection would increase crime or why crime would result in a physical impact on the environment. Please also see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, and 5.8, *Hydrology and Water Quality*, of the DEIR. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). However, there would be no significant impacts along the roadway segment of Via Alta. With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to noise. All other potential impacts were determined to be less than significant, including those related to air quality and water quality. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

Letter AY

From: [Douglas Frost](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Thursday, May 11, 2017 2:56:48 PM

AY-1

My wife and I are homeowners in the Civita area and we oppose the city planning a connection to the 805 from Civita neighborhood. We want to keep this place a very safe and walkable community and don't want to have constant traffic coming up from Mission Valley to get to the 805 freeway. Mission Center Road/Murray Ridge Road is the best inlet/outlet for 805 traffic and has been working very well for a long time.

Remember, this is a community and more traffic congestion thru this area defies the point of this type of planned neighborhood.

Thank you for taking our opinion about this project into consideration,

Douglas and Lauren
2630 Aperture Cir, SD, CA 92108

Letter AY: Douglas and Lauren Frost

AY-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety and walkability. The commenter also states the opinion that Mission Center Road/Murray Ridge Road is the best point of access for I-805 traffic.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general issues related to pedestrian safety and walkability, but does not specifically raise issue regarding the adequacy of the DEIR.

Regarding Mission Center Road/Murray Ridge Road as the best point of access for I-805 traffic, please see the response to comment AN-6 and Section 5.2, *Transportation and Circulation*, of the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

Letter AZ

From: [Kelly Agrey](#)
To: [PLN PlanningCEQA](#)
Subject: Freeway connector
Date: Friday, May 12, 2017 8:50:27 AM

To whom it may concern,

AZ-1

What benefits will the freeway connector bring to civita?
Have you thought about the parks in the area and how dangerous this will be for children of the neighborhood?
How will this impact the traffic flow on the tiny streets of civita?
I'm extremely concerned about these matters.

Kelly Agrey

Sent from my iPhone

Letter AZ: Kelly Agrey

AZ-1: This comment poses three questions related to the benefits of the freeway connector, the parks in the area and how dangerous the proposed project would be for children, and how the proposed project would impact traffic flow in Civita.

Please see the responses to comments F-2 and F-4. This comment raises general concerns related to traffic and pedestrian safety, but does not specifically raise issues concerning the adequacy of the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR. There are no requirements of CEQA to disclose the benefits of a project within an EIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: [Michael D. Hubbard](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Friday, May 12, 2017 11:27:55 AM
Attachments: [Save Civita - General Comments on EIR - No Freeway Connectors 5-11-17.pdf](#)
[Letter to the City May 2017.docx](#)

Please find the attached letter from myself, along with an additional letter and information from myself and my Civita neighbors.

DO NOT APPROVE THE ROADWAY CONNECTOR FROM SERRA MESA TO CIVITA!!

(See attached file: Save Civita - General Comments on EIR - No Freeway Connectors 5-11-17.pdf)(See attached file: Letter to the City May 2017.docx)

Thank you,

Michael D. Hubbard
Solar Turbines Incorporated - San Diego CA
Project Applications Engineering
Office Phone: 858-694-6207
Email: hubbard_michael_d@solarturbines.com

BA-1

SAVE CIVITA TALKING POINTS - General

FREEWAY CONNECTORS DO NOT BELONG WITHIN THE WALKABLE COMMUNITY OF CIVITA

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector.


Last month the City recirculated 2016's Draft EIR proposal (Environmental Impact Report). This second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.

- If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.
- At what cost? At the degradation of Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.
- The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. **This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.**
- Residents see themselves as Stewards of Civita, not NIMBYs. They are the ones that bought into the City's progressive plan of communities and parks for the future and they are the ones that will make sure it succeeds.
- Home owners in Civita were surveyed and 95% of them are against the freeway connector.
- When Civita owners bought their homes,
 - the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa.
 - the home builder's sales agents downplayed the possibility of the freeway connector. buyers were told the connector "likely won't happen."
 - marketing/Promotion materials touted Civita as the "perfect walkable community."
 - disclosures indicated the connector was a "possibility" not a definite. The 1985 Community Plan included the freeway connector as an "option" not definite.
- The City has already factored this connector into their traffic studies for future growth in Mission Valley. It is apparent the City has planned for this connector all along, but Civita home

BA-2

owners were not informed of the City's true intention.

- If the home builders and developer thought that telling the home buyers about the freeway connector would sell homes they would have advertised it. But instead they went out of their way to downplay or omit the possibility of a freeway connector. This indicates they knew there would be difficulty selling homes if everyone knew their residential street was going to become a freeway connector.
- Civita owners are tasked with paying for the new Civita Park that is open to the public. The Civita maintenance assessment district is funded by annual charges of about \$200 to \$300 per housing unit. Adding up to \$600,000 in operational and maintenance cost with the City adding only a small percentage of \$60,000 per year.
 - Via Alta and Franklin Ridge surround the park on both sides. the Park becomes less desirable because of the noise, pollution, traffic, and safety risk the freeway connector will present.
 - The freeway connector will lower home values and create instability in the Civita housing market. This will put a greater burden on the owners who must pay for the public park.
- Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street.
- There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school.
- There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allow and because of access for emergency vehicles, speed bumps not allowed.
- Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.
- Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.
- The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?
- GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area.

- 
- Easy ingress/ egress to Civita in multiple directions will increase the crime rate.
 - There are other improvements already approved for Mission Valley that will ease traffic congestion. The intersection of 163 and Friars Road is schedule to be completely reconfigured to function better. There are other options to improve traffic flow in Mission Valley without having the destroy a neighborhood to do it.
 - Stop pushing outdate planning concepts. Where does it end, when does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution?
 - The City seems to be at odds with itself. It knows we need more mass transit for the future. It knows people's driving habits must change. But at the same time the City enables this behavior. How do you get people to stop driving when the City keeps building more ways for cars to go?
 - Put the time and energy into improving and adding more mass transit in and through Mission Valley. Make it harder to use a car and make it easier to use alternative forms of transportation. Whatever the City does, DO NOT ruin a neighborhood in the process.

BA-2
(cont'd)

Save Civita

Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?
4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.
 - a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
 - b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?
5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:
 - Potential new public transit corridors to reduce vehicles;
 - Potential new Riverwalk trolley station and relocated trolley station at Mission;
 - Valley Center to increase ridership;
 - Potential new skyways to UCSD and University Heights;
 - Planned and potential new walking multi-use paths;
 - Planned and potential new cycling paths;
 - Recommendations for roadway and connectivity improvements;
 - Recommendations for new freeway interchanges and improvements;

Save Civita

Continuation of Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
 - Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
 - High traffic streets adjacent to residential has been shown to diminish quality of life;
 - High traffic streets adjacent to residential has been shown to diminish property values;
 - Impacts safe access to Civita Park;
 - Impacts safe access to Civita's future grade school;
 - Impacts safe access to Civita's future community center and dog park;
 - Easy vehicular ingress/ egress in multiple directions increases crime rates;
 - Proposed regional traffic impacts residential neighborhoods;
 - Proposed regional traffic negatively impacts property values;
 - Proposed regional traffic impacts tranquility, peace and quiet;
 - Proposed regional traffic impacts nature, air quality and biology;
 - The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
 - Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
 - Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
 - Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
 - Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).
7. *"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:*
 1. *Whether police and fire response times would be improved with the road connection.*
 2. *Whether the road connection could serve as an emergency evacuation route.*
 3. *Whether it is feasible to make the road available for emergency access only.*
 4. *Whether pedestrian and bicycle access would be improved by the street connection."*

- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

BA-2
(cont'd)



- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

Michael Hubbard



2618 Aperture Circle • San Diego, CA 92108 • Phone: 619-481-1710
E-Mail: hubbard_michael_d@solarburbines.com

Date: 5-12-2017

Seth Litchney
Senior Planner
City of San Diego Planning Department
1010 2nd Avenue
MS 413, San Diego, CA 92101

Dear Mr. Litchney:

BA-3

My family and I live in the newly developed community of Frame and Focus within the larger master planned community of Civita. It is a wonderful new place to live in the heart of San Diego, and is close to everything we love about this city. We live so close to our work places, we no longer use the freeways to commute to work! My wife can actually walk to work now.

BA-4

I'm writing this letter to voice my concerns of the proposed plan to connect Via Alta/Franklin Ridge Road to Phyllis Place. I've read that this will bring in up to 35,000 cars a day through our slow, quiet, and safe neighborhood. In fact, Via Alta and Franklin Ridge Road are residential roads, with children, joggers, and pets among others who enjoy the quiet, slow pace of a walking community. There is a new dog park right at the top of Via Alta that is complete for everyone to enjoy, and a proposed elementary school at the bottom. The plan to open up the community to a connector off the 805 freeway, one of the busiest freeways in San Diego, will have detrimental impacts to the environment and to the families who call Civita their new home. My family and I will no longer feel safe walking our little dog across and up and down Via Alta as we do now on a daily basis.

BA-5

After reading San Diego own Programmatic Environmental Impact Report, it shows the Via Alta and Franklin Ridge Road classified as modified 2-lane major collectors, **not** as 2-lane collector multi-family residential streets, which they are. The PEIR needs to be amended to show the facts. In addition to reading the report, I can find no reason to make the proposed connector, as Phyllis Place/Murray Ridge Road is already connected to Mission Valley via Mission Center Road. Mission Center Road connecting to Murray Ridge Road does not transit through a residential neighborhood, and has a speed limit of 45 mph, not 25 mph or less, which is what we enjoy within Civita.

BA-6

As a concerned citizen with friends and family who live in this community, we strongly urge you to **NOT** go forward with this horrible plan. Our beautiful new neighborhood-village will forever be ruined before it even has the chance to grow and flourish within the heart of Americas Finest City.

BA-7

Thank you for your attention to this very important issue.

Sincerely,

Michael Hubbard
Engineer and Citizen of San Diego

Letter BA: Michael D. Hubbard

BA-1: This comment expresses opposition to the proposed project and states to refer to the attached comment letter.

Please see the response to comment F-2. This comment does not address the adequacy of the DEIR and states the commenter's general opposition to the project.

BA-2: This letter and the entirety of the comments within are the exact same as Comment Letter F. Please see the responses to comments within Letter F.

BA-3: This comment provides a personal history of the commenter. This comment does not address the adequacy of the DEIR.

BA-4: This comment states that the commenter would generally not feel safe if the project is approved and that the project would have detrimental impacts on the environment.

Please see the response to comment F-4. This comment does not address the adequacy of the DEIR.

BA-5: This comment is similar to comment F-3. Please see the response to that comment.

BA-6: This comment generally states that the commenter finds no reason to connect the road through a residential neighborhood and generally discusses speed limits. It should be noted that Civita is not just a residential neighborhood. When fully built out, it will also include 603,000 square feet of retail space and 620,000 square feet of office park/business uses. This comment does not address the adequacy of the DEIR.

BA-7: This comment again expresses the commenter's opposition to the project. Please see the response to comment F-2. This comment does not address the adequacy of the DEIR.

From: [Mike](#)
 To: [PLN PlanningCEQA](#)
 Cc: [Mike Thomas](#)
 Subject: Attn: Susan Morrison> Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
 SCH No. 2012011048
 Date: Saturday, May 13, 2017 7:38:22 PM

Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605

- BB-1 I strongly oppose this road connector for many reasons. There is only a one-way lanes in each direction. This cannot be considered as a thoroughfare for all of Mission Valley. Could you imagine if there was a stalled vehicle, bus or traffic accident? There is not adequate passable room to get around with only one single lane. This would cause a major back up if these roads were used by commuters. As I have seen many of the residents drive quite fast up and down Via Alta and it would be hard to stop the cars inertia downhill with oncoming merging cross traffic and blinding tree foliage. There really should be stop signs at each community driveways. As far as the homes along Via Alta being to close to the road at Altana it is 28 feet from home to road. Added noise and pollution on a constant continuum. Again, this is crucial! Residents will have a very difficult time crossing tree lined median on a hill with cars traveling down at a fast rate of speed.
- BB-2 A future school with approximately 600 students are planned to occupy the lot at the bottom of the hill at Via Alta and Civita Blvd. I been to many schools and I know about how the parents/drivers that would be dropping off there children in front of school. There is not any parking on Via Alta or Civita Blvd to do drop offs or pick-ups. Trust me that drivers will do it, and they will block traffic. I contacted the Planning Commission, and it was addressed that there would be monitors to direct traffic into the school zone, true? But I have recalled past experiences with many different scenario's of drivers double parked, blocking traffic on a single lane road? Parking in the red zone. And having to make u-turns to get on the right side of the road or entrance. Will they use the new Civita park parking lot? Would that cause a problem with Civita Park user's with their enjoyment? Will these traffic monitors be police and will it cost the city to pay from this assistance?
- BB-3 **From the Mission Valley News:** Dated March 13, 2015
<http://missionvalleynews.com/no-money-no-students-no-problem-district-eyes-new-mission-valley-school/>
 ...That's great for **Sudberry**: A quality local school is good for **property values**, especially when you're selling single-family homes meant for young families. And all the better if it's a school built around a unique concept that attracts parents...
"So when you're talking about sustainability and reduced miles traveled and all the things that we're hoping to accomplish with Civita, the charter school just didn't seem like it would be the right fit in some ways," Sessa said.
- BB-4 **Q:** If the City decides not to build at that site and the idea of a Charter school was put back on the table, would that mean school buses would be brought into the community? Where would they be parking?
"So when you're talking about sustainability and reduced miles traveled and all the things that we're hoping to accomplish with Civita, the charter school just didn't seem like it would be the right fit in some ways," Sessa said.
- BB-5 **Q:** I would say that what **Sudberry was looking to built was a "walkable and sustainable community here, No?** And if you were to actually come out and see for yourselves you might consider that the community is designed for a high concentration of urban sprawl.
- BB-6 **Q:** So how will this be good for property values if there was grid lock during commute times? **I think thriving community is good for property values and increased tax revenues that pay for City services and substantial incomes for City employers, no?**

BB-7 | **Q: What about the Environmental Impact of our Civita residents that live right on the roadway?**

As close as 28 feet street on Via Alta at Altana property.

BB-8 | **Q:** What would be the acceptable noise and air pollution level for cars traveling up these roads in you future worst case scenarios?

BB-9 | **Q:** I would like to know why the **Sales personnel at Lucent and Apex** were not aware for the future proposed connector road when I asked them last month? I would think that many others new homeowners would be surprised to know that. If there was any interest in finding out about what the community really felt about this connector road going in, you might have a stronger response from the residents. The majority of homeowners are against this roadway.

I saw my name on the last SDPC community input **to be contacted**, but I did not receive any information from San Diego Planning Commission. I found out by a Serra Mesa Community chat room.

BB-10 | Last year when the Planning Commission wanted input on the road connector. **I made the comment that there were several residents willing to compromise having a 4 lane road on Franklin Ridge Rd. but not Via Alta. Q: Why was this not considered?**

Why didn't the road connector get built first using Sudberry money? And why wasn't this a 4 lane road on Franklin Ridge Rd, if your looking to just get the traffic moving?

I have seen Charger Qualcomm events use our community Russell Pkwy to Civita Blvd to access Mission Center Rd. at **speeds unacceptable** to this area's designed use. GPS is an amazing tool to find the short cuts.

BB-11 | **San Diego Planning Commission**, Our pocket community is a walkable community that can promote healthier and more sustainable lifestyles for their residents. By reducing dependence on automobiles, residents are able to make the healthy decision. Walkable streets create a safer environment for pedestrians and bicyclists within the community. Please do not continue with this old paradigm of opening up the roads to traffic. This could be a shinning example of things to come.

Sincerely,

Mike Neville,
a Civita resident

Letter BB: Mike Neville

BB-1: The commenter expresses opposition to the proposed project due to the potential traffic congestion it would create along Via Alta as well as the lack of traffic calming measures along Via Alta. The comment also mentions noise and pollution would increase along Via Alta.

Please see the responses to comments F-4, F-5, and W-1. Please see Section 5.2, *Transportation and Circulation*, for a full analysis of the potential impacts to traffic and circulation as a result of the proposed roadway connection. Please see Sections 5.3, *Air Quality*, and 5.4, *Noise*, for further discussion of the potential significant impacts as a result of the proposed project. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to noise and visual effects/neighborhood character. All other potential impacts were determined to be less than significant, including those related to air quality and hydrology/water quality. The comment addresses general issues associated with increased traffic, but does not raise issues concerning the substantive analysis conducted with the DEIR. No changes to the FEIR are needed as a result of this comment.

BB-2: This comment raises concerns about the siting of a future school at the intersection of Via Alta and Civita Boulevard. The commenter is concerned about congestion due to students being dropped off at the school and if there would be traffic monitors in the school zone.

Please see the response to comment F-4.

BB-3: This comment included a link to an article from Mission Valley News dated March 13, 2015, pertaining to the potential school site.

Please see the response to comment F-4.

BB-4: This comment asks if school buses would be brought into the community, and asks where they would be parked.

This comment references perceived impacts that would result from the potential future school within Quarry Falls. The impacts of the potential school site were analyzed within the Quarry Falls PEIR and have no bearing or relationship to the proposed project.

BB-5: This comment suggests the community was planned as a walkable and sustainable community.

Please see the responses to comments F-4 and F-5.

BB-6: This comment raises concerns about the impact to property values from the proposed project.

Per CEQA Guidelines, the EIR does not analyze economic impacts, only environmental impacts, resulting from the proposed project. Please also see the response to comment F-2.

BB-7: The commenter is concerned with the environmental impacts to the residents that live as close as 28 feet from Via Alta.

The environmental analysis of potential air quality and noise impacts contained within the DEIR evaluates the proximity of residents to the proposed roadway connection during both construction and operation. Potential air pollution impacts to nearby sensitive receptors (including residences) were also modeled as part of the analysis. No potentially significant impacts to sensitive receptors were identified. Please see Sections 5.3, *Air Quality*, and Section 5.4, *Noise*, of the DEIR for further information concerning the potential impacts.

BB-8: The commenter asks what the acceptable noise and air pollution levels would be in the future worst case scenarios.

The standards for acceptable noise levels are set by the City's Noise Ordinance (Section 59.5.0401 of the municipal code). Future traffic noise was modeled for near-term (2017) and long-term (year 2035) scenarios as part of the noise impact analysis, which can be found in Section 5.4, *Noise*, of the DEIR. The estimated traffic noise for Receiver 11, which represented residential land uses adjacent to Via Alta, would increase by 3 dBA in the near-term from 57 dB to 60 dB CNEL due to the proposed project. The resulting noise level would be less than the exterior residential threshold of 65 dB CNEL. Therefore, the near-term traffic noise increase would be a less-than-significant impact.

Long-term traffic noise was estimated to increase by 6 dB, from 57 to 63 dB CNEL. This resulting increase would also be below the exterior residential threshold of 65 dB CNEL. Therefore, the proposed project would not expose residences along Via Alta to traffic noise levels that exceed the City standards and impacts would be less than significant.

Acceptable standards for criteria air pollutants are set by the San Diego Air Pollution Control District and the City's screening criteria. Section 5.3, *Air Quality*, of the DEIR evaluates the potential impact to air quality from the construction and operation of the proposed project. The evaluation found the impacts to air quality would be less than significant.

BB-9: This comment asks why the sales personnel at Lucent and Apex were not aware of the proposed project. The comment also states the majority of the residents in the neighborhood are opposed to the roadway.

Please see the response to comment F-2. This comment does not address the adequacy of the DEIR.

BB-10: The commenter states several residents would support a 4-lane road on Franklin Ridge Road, but not on Via Alta. The commenter asks why this alternative was not considered.

The proposed project would construct a roadway connection between Phyllis Place and the intersection of Franklin Ridge Road and Via Alta, as a link between the neighborhoods of Serra Mesa and Mission Valley. The proposed project does not propose to alter the design, size, or capacity of Via Alta. Chapter 9, Alternatives, discusses the project alternatives. Pursuant to the CEQA guidelines, alternatives are selected based on their ability to achieve the project objectives, their feasibility, and their ability to avoid or substantially lessen one or more significant environmental impacts of the project. Project alternatives were selected based on this criteria, and were analyzed as compared to the proposed project.

BB-11: This is a conclusory statement reiterating the commenter's opposition to the proposed project. No further response is required under CEQA.

Letter BC

From: [Mary Johnson](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa roadway connector
Date: Monday, May 15, 2017 2:10:30 PM

BC-1

I am submitting my concerns on the freeway connector through my neighborhood of Civita. I bought in Civita because it was sold as a walkable community. I found it disheartening to discover that Via Alta which is a 2 lane road could turn into a thoroughfare thru our neighborhood. How do you justify having a 4 lane connector road dump onto a 2 lane road that runs through my neighborhood. This makes no sense beside all the safety issues.

BC-2

Please use some common sense and reject this road to save my community. I want my disabled daughter to be able to walk around safely. I want to be able to walk my dog without thousands of cars flying past me.

SAVE CIVITA!!!!!!

Mary

Letter BC: Mary Johnson

BC-1: The commenter expresses opposition to the proposed project based on concerns about safety and walkability of the neighborhood.

Please see the responses to comments F-2, F-4, and F-5. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: [Edward Lopatin](#)
To: [PLN PlanningCEQA](#)
Cc: [Councilmember Scott Sherman](#)
Subject: Reject Serra Mesa Community Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Monday, May 15, 2017 1:41:26 PM

May 15, 2017

Ladies and Gentlemen, San Diego Planning Department, Supervisor Scott Sherman

Re: Reject Serra Mesa Community Roadway Connection Project No. 265605 SCH No. 2012011048

BD-1

I am a new resident of San Diego. My partner and I purchased a new home in the Civita area of San Diego, in the Frame and Focus Community. Our home is no more than thirty feet from Via Alta, one of the two streets that you guys are considering as a freeway access and egress.

I am vehemently opposed to this proposal, and hope you guys have the wisdom to reject this outdated proposal, prepared years before the Civita Community was ever envisioned.

Civita was designed to be a pedestrian friendly community, where young children would be safe from vehicular traffic. The Planning Department approved Civita's vision, didn't it? This freeway proposal would destroy the ambiance of this community.

I have the following questions which I request you answer in due order:

BD-2

The two roads in question are one lane in each direction, with no plans for stop signs and traffic lights? How are residents, particularly young children expected to cross this street to access the park and clubhouse?

BD-3

A freeway access and egress on city streets designed for one car in each direction. Really? Don't you realize that fire trucks, police vehicles, and ambulances will be stymied in their effort to save lives? DON't you realize that residents will need more time to enter and leave the community.

BD-4

There is an elementary school planned for the corner of Via Alta and Civita Blvd. With a freeway access and egress rolling right past this new school. Don't you realize that there will be gridlock at that intersection? Don't you believe that young children will be at risk because of the traffic?

BD-5

There are dozens of residents here who purchased their homes thinking that they were moving into a pedestrian friendly area, with minimal traffic. Many residents here have respiratory and coronary issues (including my husband). Freeways through our neighborhoods will provide health issues for some. Do you care? How can you reconcile what appeared to be a pedestrian friendly community with your proposal to bring Highway 805 closer to our homes?

- BD-6 | Why are you proceeding with a freeway proposal for a community that was not envisioned when the plan was developed? Isn't time for you guys to go back to the drawing board and develop a realistic plan that works for this community?
- BD-7 | The Planning Department, the Mayor, the City Council all have spoken on building a San Diego that is pedestrian friendly. Why are you proceeding with a proposal that is the direct opposite of your long term vision for the City? Where are you now dismissing that vision?
- BD-8 | As a resident and taxpayer, I'd like a responsible and rationale answer to my questions.

Let me know if you need any additional insight.

Edward Lopatin
2631 Aperture Circle
San Diego CA 92108
EdwardLopatin@gmail.com
(760) 408-6542

Letter BD: Edward Lopatin

BD-1: This comment is an introductory comment and expresses the commenter's opposition to the proposed project due to concerns about pedestrian safety and the ambiance of the community. The commenter's home is in close proximity to Via Alta.

Please see the response to comment F-2. The concerns about pedestrian safety and community ambiance are addressed below, in responses to comments BD-2 through BD-7. This comment does not address the adequacy of the DEIR.

BD-2: This comment addresses concerns about crossing the street to access the park and clubhouse with no traffic lights or stop signs.

Please see the responses to comments F-4 and F-5 regarding pedestrian safety and circulation.

BD-3: This comment states concerns over emergency access, and the time it would take residents to enter or leave their communities.

Please see the response to comment G-126. Please see Section 3.0, Project Description, of the DEIR for a summary of the Project Objectives. Objective 2, "Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas." The proposed project would provide an additional route for emergency response vehicles to quickly access emergency situations within these neighborhoods. It would also result in an alternative evacuation route for community members to use in the event of an emergency. Please see Section 5.2, *Transportation and Circulation*, of the DEIR for an analysis of potential impacts to emergency access. The analysis found that the proposed project would provide additional ingress and egress off Phyllis Place and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley that would improve access in the area. Impacts would be less than significant. No changes to the EIR are required as a result of this comment.

BD-4: This comment addresses two concerns about the proposed school site in Civita. One concern is the potential congestion at the intersection closest to the proposed school site. The second concern is the safety hazard the traffic could cause for the future students of the proposed school.

Please see the response to comment F-4.

BD-5: This comment expresses concern about the potential health issues for residents with respiratory and coronary issues, which could result from a freeway through the neighborhood.

As identified in Section 5.3, *Air Quality*, of the DEIR, the proposed project would not result in significant impacts to air quality, including sensitive receptors.

BD-6: This comment asks why the proposed project was proposed for a community that was not envisioned when the plan was developed.

Please see the response to comment F-2.

BD-7: This comment states the proposed project is opposite to the pedestrian-friendly goals of the City.

Please see the responses to comments F-2, F-4, and F-5.

BD-8: This is a conclusory statement. No further response is necessary, pursuant to CEQA.

From: [Elliott, Mark/SDO](#)
To: [PLN PlanningCEQA](#); [Elliott, Mark/SDO](#)
Subject: Project Name: Serra Mesa Community Plan Amendment Roadway Connection; Project: Project No. 265605
Date: Tuesday, May 16, 2017 5:28:51 AM
Attachments: [SMletter063016.pdf](#)

Susan-

I am unable to attend the meeting this week on the Franklin Road extension. I am re-submitting my letter from last time for the record. Again, we plan circulation elements 20 and 30 years ago, yet once again like Regents Road Bridge they never get constructed, and once again we have similar situation in Mission Valley as my letter notes—those regional upgrade must be addressed first before a proposed short circuit route is “backdoored in”.

Thank you,

Mark
1.715.347.4635
mark.elliott@ch2m.com

BE-1

July 1, 2016

Mr. Seth Litchney

Senior Planner

City of San Diego

Subject: Serra Mesa Community Plan Amendment Street Connection - Project No. 265605

Dear Mr. Litchney:

As a long time property owner in the area and one that has driven in and out of Mission Valley for 40 years, I appreciate the opportunity to comment on the proposed community plan amendment --specifically the four-lane road extension Franklin Ridge Road, from Mission Valley to Phyllis Place.

It has been a pleasure to see the high quality of mixed use and urban village projects like Civitas that are so desperately needed in the City of San Diego (City) to meet the housing shortage and improve affordability. And I do understand the challenges of balancing these needs with infrastructure.

BE-2

A disturbing trend and observation over the decades are the substandard interchanges and incomplete circulation system that has left Mission Valley at times gridlocked. And it has required many local residences at peak times to find alternative ways to enter and leave the Valley. However, it does seem that if the City and Caltrans could simply complete a few critical improvements, circulation would improve and projects like Civitas could better utilize arterials like Friars Road and Mission Center Road and not have to "backdoor" a new arterial like Franklin Ridge Road to Phyllis Place. It is apparent from the traffic analysis that I-805 operates at a very poor level of service compared to SR 163 during peak demands. Why not encourage the traffic circulation to utilize Mission Valley and see that the critical regional improvements get completed!

To that end I offer the following comments and question as it relates to improving regional traffic in and out of Mission Valley:

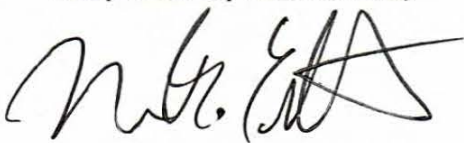
BE-3

- In about 1989 Boyle Engineering was hired by Caltrans to develop a pre-design for improving SR 163 and Friars Road Interchange, critical to improving traffic flow patterns in Mission Valley. I saw several conceptual designs improving access to Friars and Ulric Roads. Why has this not been done? Were these improvements included in the traffic modeling?
- Around this similar time, Atlas Hotels developed a land plan and worked with the City that required the extension of Hazard Center Drive from west of SR 163 to Fashion Valley Mall, also critical to improving traffic flow patterns in Mission Valley. Why has this not been done? Were these improvements included in the traffic modeling?
- Mission Valley Mall and access at Texas Street and Mission Center Road: These two areas represent some of the most substandard Caltrans intersections that one would assume have been planned to be upgraded. Are there imminent proposed upgrades? If so, were these improvements included in the traffic modeling?

BE-4

My simple question, without reviewing in too much detail the traffic modeling, is would not the above regional improvements improve the traffic flow in Mission Valley and allow Civitas a better option using Friars Road and Mission Center Road rather than a new "backdoor" connector through the Serra Mesa Community?

Respectively submitted,

A handwritten signature in black ink, appearing to read 'Mark B. Elliott', with a stylized flourish at the end.

Mark B. Elliott P.E.

Property Owner

8775 Regency Road

San Diego, CA 92123

BE-5

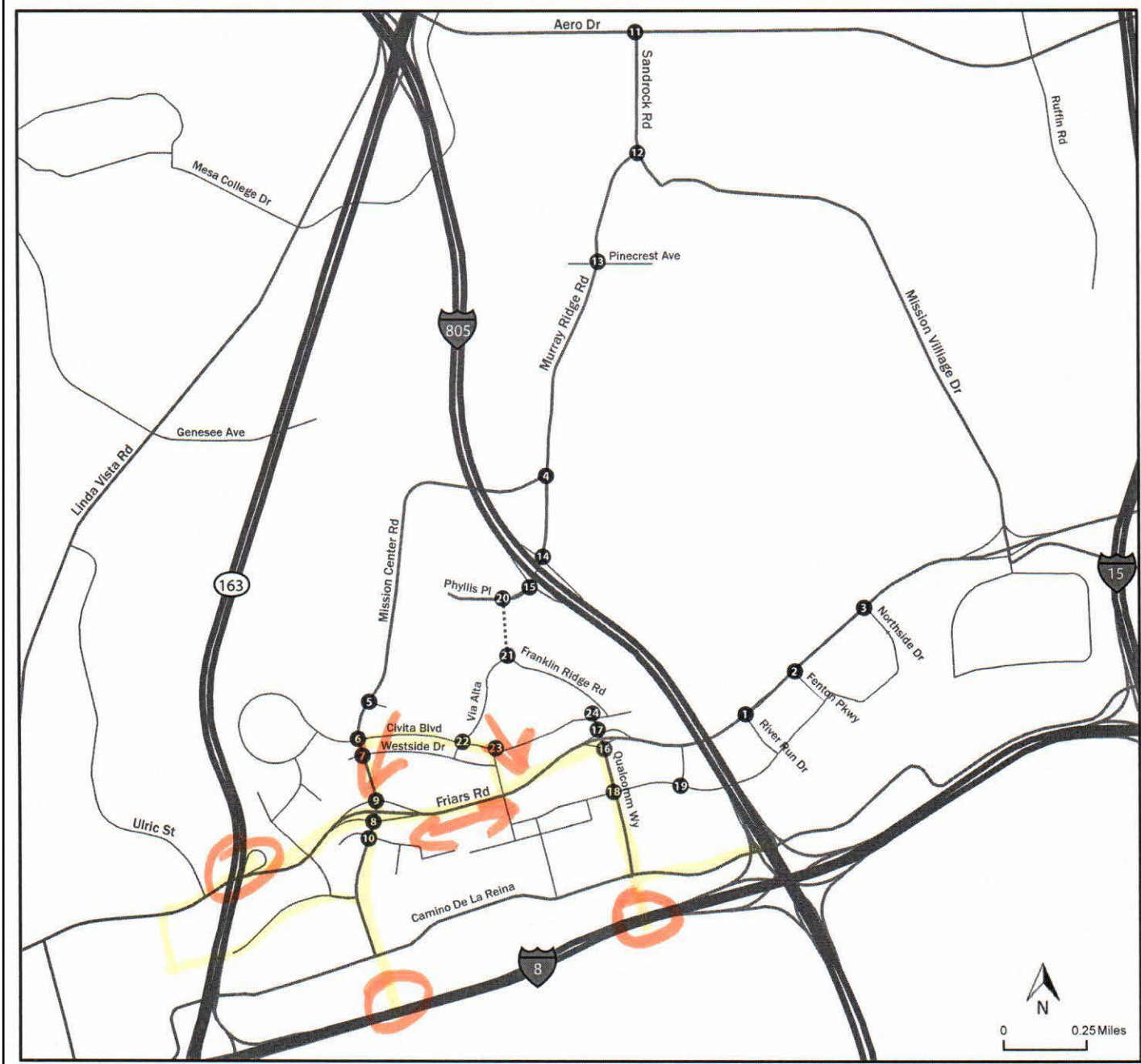


Figure 1-1
Project Study Area

Letter BE: Mark Elliott

BE-1: The commenter is re-submitting a letter to the City dated July 1, 2016.

This comment states that detailed comments are attached within the letter (responses to these comments are provided below). Please see the response to comment F-2.

BE-2: The commenter expresses appreciation for the opportunity to comment on the proposed project and suggests that the City and Caltrans could improve circulation by completing other improvements. The commenter indicates that the specific referenced improvements are to follow.

This comment is an introductory statement indicating that the commenter is providing comments and suggestions for improving regional traffic in and out of Mission Valley. This comment does not raise any issues requiring a response pursuant to CEQA. Responses to the commenter's specific comments are addressed in comments BE-3 and BE-4 below.

BE-3: The commenter identifies three separate improvements and provides comments and questions as they relate to improving regional traffic in and out of Mission Valley.

First, the commenter generally discusses improvements to the SR-163 and Friars Road interchange and conceptual designs for improving access to Friars Road and Ulric Road. The commenter also questions why these improvements have not been completed and whether they were included in the traffic modeling completed as part of the proposed project. The commenter requests information as to why regional traffic improvements have not been implemented.

The improvements identified by the commenter do not directly address the adequacy of the DEIR. However, these improvements were included in the long-term year 2035 traffic modeling. The results of this modeling are provided in Section 5.2, *Transportation and Circulation*, of the DEIR.

Second, the commenter identifies the extension of Hazard Center Drive from west of SR-163 to Fashion Valley Mall as part of a plan developed by Atlas Hotels in coordination with the City. The commenter also questions why these improvements have not been completed and whether they were included in the traffic modeling completed as part of the proposed project. The commenter requests information as to why regional traffic improvements have not been implemented.

The improvements identified by the commenter do not directly address the adequacy of the DEIR. However, these improvements were included in the long-term year 2035 traffic modeling. The results of this modeling are provided in Section 5.2, *Transportation and Circulation*, of the DEIR.

Last, the commenter generally identifies Mission Valley Mall and access at Texas Street and Mission Center Road as two areas that represent substandard Caltrans intersections and states the opinion that they should be upgraded. The commenter also questions if improvements to these areas are imminent and whether they were included in the traffic modeling completed as part of the proposed project. The commenter requests information as to why regional traffic improvements have not been implemented.

The improvements identified by the commenter do not directly address the adequacy of the DEIR. At this time, there are no planned improvements at either of these locations that qualify to include them into either the Near-Term or Long-Term modeling network.

BE-4: The commenter concludes the letter by questioning whether the aforementioned regional improvements would be better for traffic flow in Mission Valley and allow Civita residents a better option using Friars Road and Mission Center than a new “backdoor” connector through the Serra Mesa community would.

The objectives of the proposed project are outlined in Section 3.1 of Chapter 3, *Project Description*, of the DEIR. As described in Chapter 3, the objectives of the proposed project include resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and ensuring the proposed project is safe for motorists, cyclists, and pedestrians. This comment does not directly address the adequacy of the DEIR.

BE-5: The commenter provides a figure depicting the general locations of the improvements identified in comment BE-3 above.

Please see the response to comment F-2. This comment does not directly address the adequacy of the DEIR.

From: [TREVOR CURRIE](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Wednesday, May 17, 2017 10:22:12 AM

Dear City Planners,

Please reject the Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048.

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector. Last month the City recirculated 2016's Draft EIR proposal (Environmental Impact Report), **projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.** If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805. This connector would cause the degradation of Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.

The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. **This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.**

Residents see themselves as Stewards of Civita. They are the ones that bought into the City's progressive plan of communities and parks for the future and they are the ones that will make sure it succeeds. Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street. **There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge.** Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school. There are few options to slow traffic and allow crossings on these streets. Because of the steep

BF-1

BF-2

BF-2
(cont'd)

grade of Via Alta and Franklin Ridge cross walks are not allowed and because of access for emergency vehicles, speed bumps not allowed.

Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.

BF-3

The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents.

BF-4

When does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution? The city knows we need more mass transit for the future. It knows people's driving habits must change, but at the same time the City enables this behavior. How do you get people to stop driving when the City keeps building more ways for cars to go? Put the time and energy into improving and adding more mass transit in and through Mission Valley. Make it harder to use a car and make it easier to use alternative forms of transportation. **Whatever the City does, DO NOT ruin a neighborhood in the process.**

BF-5

--[if !supportLists]-->1. <!--[endif]-->The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.

--[if !supportLists]-->a. <!--[endif]-->Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?

--[if !supportLists]-->b. <!--[endif]-->When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high- volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

--[if !supportLists]-->2. <!--[endif]-->Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?

--[if !supportLists]-->3. <!--[endif]-->Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance

along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.

--[if !supportLists]-->a. <!--[endif]-->Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?

--[if !supportLists]-->b. <!--[endif]-->Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?

--[if !supportLists]-->c. <!--[endif]-->Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?

--[if !supportLists]-->d. <!--[endif]-->Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?

--[if !supportLists]-->e. <!--[endif]-->How does the Draft EIR address pedestrian safety within the walkable community of Civita?

--[if !supportLists]-->4. <!--[endif]-->The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.

--[if !supportLists]-->a. <!--[endif]-->Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four land, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?

--[if !supportLists]-->b. <!--[endif]-->Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

--[if !supportLists]-->5. <!--[endif]-->The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:

Potential new public transit corridors to reduce vehicles;

Potential new Riverwalk trolley station and relocated trolley station at Mission;

BF-5
(cont'd)

BF-5
(cont'd)

- ↑ Valley Center to increase ridership;
- Potential new skyways to UCSD and University Heights;
- Planned and potential new walking multi-use paths;
- Planned and potential new cycling paths;
- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;
- Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?
6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?
- Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:
- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- ↓ Easy vehicular ingress/ egress in multiple directions increases crime rates;

BF-5
(cont'd)

Proposed regional traffic impacts residential neighborhoods;

Proposed regional traffic negatively impacts property values;

Proposed regional traffic impacts tranquility, peace and quiet;

Proposed regional traffic impacts nature, air quality and biology;

The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.

Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.

Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.

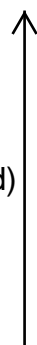
Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.

Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).

7. *"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:*

1. *Whether police and fire response times would be improved with the road connection.* 2. *Whether the road connection could serve as an emergency evacuation route.* 3. *Whether it is feasible to make the road available for emergency access only.* 4. *Whether pedestrian and bicycle access would be improved by the street connection."*

BF-5
(cont'd)



Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.

What portions of the Recirculated DEIR address the four named objectives in the resolution?"

<!--[if !supportLists]--><!--[endif]--> Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

BF-6

I hope you will consider these questions and the effect it will have on families and a thriving neighborhood when voting on this proposed connector. I look forward to your response.

Best Regards,
Trevor Currie
619-884-2384
Civita Resident

Letter BF: Trevor Currie

BF-1: The commenter expresses opposition to the proposed roadway connection and repeats information from Letter F (Save Civita). Please see the response to comment F-2.

BF-2: The commenter repeats information from Letter F (Save Civita). Please see the response to comment F-2.

BF-3: The commenter repeats information from Letter F (Save Civita). Please see the response to comment F-2.

BF-4: The commenter repeats information from Letter F (Save Civita). Please see the response to comment F-2.

BF-5: The commenter repeats information from Letter F (Save Civita). Please see the responses to comments F-3 through F-11.

BF-6: The commenter concludes the letter by requesting that the City consider the aforementioned questions and the effect of the proposed roadway connection on the neighborhood.

Please see the response to comment F-2. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

Letter BG

From: [Denise Davidson](#)
To: [PLN_PlanningCEQA](#)
Cc: [Denise Davidson](#)
Subject: Franklin Ridge Road Questions - Civita and Serra Mesa Communities
Date: Thursday, May 18, 2017 8:45:11 PM

To Whom This Concerns:

Questions:

- BG-1 | 1). Why is the project going forward when a majority of residents from Serra Mesa and Civita don't want the Franklin Ridge Road connection into the respective neighborhoods?
- BG-2 | 2). How much faster will the roads wear away with the increased traffic if the project road is completed? And with the increased car load, what will it do to existing infrastructure via street surfaces?
- BG-3 | 3). What mitigation is included to off set wait times to get onto South bound 805 or North bound 805 from that juncture with the increase of traffic coming up from Civita and competing with already prolonged time waits to access these on ramps, especially during peak hours of 7:00 am to 9:00 am and 3:00 pm to 6:00 pm?

I look forward to your responses.

Thank you,
Denise Davidson

Email: denisedavidson1884@gmail.com

Letter BG: Denise Davidson

BG -1: The commenter questions why the proposed roadway connection is moving forward despite opposition from the residents of Serra Mesa and Civita.

Please see the response to comment F-2.

BG-2: The commenter questions how much faster the roads will wear away with the increase in traffic and how the increased traffic will affect the quality of existing infrastructure via surface streets.

The comment does not specify which streets might wear away as a result of increased traffic. The proposed project would not generate any additional vehicle trips, but would merely redistribute traffic that would be generated as the Mission Valley and Serra Mesa communities continue to grow. Degraded roadway facilities would be repaired by the City as necessary, consistent with all roadways present throughout the City of San Diego.

BG-3: The commenter questions what mitigation would offset wait times to access I-805 with the increase in traffic through Civita, particularly during the peak hours of 7:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Section 5.2, *Transportation and Circulation*, of the DEIR analyzes the near-term (year 2017) and long-term (year 2035) traffic impacts of the proposed project. Near-term (year 2017) impacts of the proposed project are discussed under Issues 1 and 2 of Section 5.2, while long-term (year 2035) impacts are discussed under Issue 3. As discussed under Issues 1 and 2 of Section 5.2, near-term impacts along Phyllis Place to the I-805 southbound and I-805 northbound ramps would be reduced to less than significant with the implementation of mitigation measures MM-TRAF-3 and MM-TRAF-4. MM-TRAF-3 requires the widening of Phyllis Place from Franklin Ridge Road to the I-805 southbound ramps, while MM-TRAF-4 requires restriping Phyllis Place from I-805 southbound ramps to I-805 northbound ramps. In addition, near-term impacts at the intersections of Murray Ridge Road/I-805 southbound ramps and Murray Ridge Road/I-805 northbound ramps would be reduced to less than significant with the implementation of mitigation measures MM-TRAF-5 and MM-TRAF-6. MM-TRAF-5 requires a combination of restriping, reconfiguring, and widening at the Murray Ridge Road and I-805 northbound ramps intersection, while MM-TRAF-6 requires widening at the Murray Ridge Road and I-805 southbound ramps intersection.

As discussed under Issue 3 of Section 5.2, long-term impacts along Phyllis Place to the I-805 southbound and I-805 northbound ramps would be reduced to less than significant with the implementation of mitigation measures MM-TRAF-11 and MM-TRAF-12. Both of these mitigation measures are consistent with the improvements required by MM-TRAF-3 and MM-TRAF-4 for near-term impacts. In addition, mitigation measures MM-TRAF-15 and MM-TRAF-16 would improve LOS to an acceptable level in the AM peak hour at the intersections of Murray Ridge Road/I-805 northbound ramps and Murray Ridge Road/I-805 southbound ramps, respectively. However, MM-TRAF-15 and MM-TRAF-16 would not improve LOS to an acceptable level at these intersections in the PM peak hour that would be below the City's thresholds. As a result, these impacts would remain significant and unavoidable. Furthermore, potential long-term impacts at the I-805 southbound on-ramp at Murray Ridge Road would be reduced to less than significant with the implementation of mitigation measure MM-TRAF-18, which requires the City to contribute a fair share contribution, in

coordination with Caltrans, to be applied toward an additional regular traffic ramp on this freeway on-ramp.

Letter BH

From: [Carole Porter](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
Date: Thursday, May 18, 2017 8:56:11 PM
Importance: High

BH-1

I strongly oppose the Franklin Ridge Road Connection which would connect the Civita community with Serra Mesa and freeway 805. The very long traffic delays and increases plus increased noise and exhaust pollution are obvious negatives. I am also concerned about safety as cars are waiting at traffic lights underneath those high density power lines where you can hear the electricity sizzle!! The road is planned to cut right through a planned park along Phyllis Place....another severe safety issue!

BH-2

If you must continue with this road (since Sudbury is paying for it!!), can you at least limit the traffic to automobiles and ban all trucks? Delivery trucks are heavy and slow and will need to shift to lower gears causing more noise and exhaust pollution.

Emergency access may be required, but please, let's not make a currently poor traffic situation even worse!!

Sincerely,
Carole Porter
8409 Abbotshill Road
San Diego, CA 92123

Letter BH: Carole Porter

BH-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding increased traffic, noise, exhaust pollution, and safety. The commenter requests that trucks be prohibited from the road due to increased noise and pollution from the exhaust if the project is approved.

Please see the response to comment F-2. This comment raises general concerns related to increased traffic and delays, noise, exhaust emissions, and safety, but does not specifically raise issue regarding the adequacy of the DEIR. Please see response to comment AD-1, which indicates that the street, intersections, and other facilities would be designed in accordance with the City of San Diego's Street Design Manual (2002). Please also see Section 5.2, *Transportation and Circulation*, of the DEIR for the impact determinations on traffic and response to comment AE-1 for a summary of the significant and unavoidable traffic impacts. Furthermore, please see Sections 5.3, *Air Quality*, 5.4, *Noise*. Based on the impact analysis contained in these sections, the proposed project would result in less than significant noise impacts after mitigation, and less than significant impacts related to air quality. The comment states opposition to the proposed project but does raise issue regarding the adequacy of the DEIR.

Letter BI

From: [Geraldyn White](#)
To: [PLN PlanningCEQA](#); [Weinlein, Cassandra](#); [Saidkhanian, Liz](#)
Subject: Fw: 265605 SMCommunity Plan AmendmentRoadway
Date: Sunday, May 21, 2017 7:22:36 PM

On Sunday, May 21, 2017 6:06 PM, Geraldyn White <geraldyn.white@yahoo.com> wrote:

Good morning:

- BI-1 | I am opposed to the Franklin Ridge Road connection. And I will tell you my concerns.
- BI-1 | This road will greatly impact my street Greyling Drive and neighboring street Murray Ridge Road. There are many vehicles that use our streets as a short cut to the 805 freeway as we speak. This road connection will only make our quality of life worse.
- BI-2 | This connection will make traffic worse traveling north or south to 805 freeway. This connection has a significant impact at six freeway segments.
- BI-2 | Please comment how this would improve travel.
- BI-3 | What about sensitive receptors to the children at nearby Faith Community School and senior housing at City View Church? The impact of 56 multifamily senior retirement units is in jeopardy. Please comment, what time of the day were your studies taken? Was school in session?
- BI-3 | There is also a very important impact to the environment constructed through sensitive habitat and particularly coastal sage.
- BI-3 | PLEASE consider the questions I have brought before you.

Regards,
Geraldyn White

Letter BI: Geralyn White

BI-1: The commenter expresses opposition to the proposed project and general concerns regarding impacts to Greyling Drive and Murray Ridge Road and the use of these roadways as short cuts to the I-805 freeway. The commenter expresses the opinion that the proposed roadway connection will make quality of life worse.

Please see the response to comment G-70. This comment expresses opposition to the proposed project and raises concerns related to impacts to Greyling Drive and Murray Ridge Road. The traffic study area for the proposed project is defined in Section 5.2, *Transportation and Circulation*, of the DEIR, which does not identify Greyling Drive as a potentially affected roadway. The potential impacts of the proposed roadway connection on the transportation facilities within the traffic study area are fully disclosed in the DEIR. As indicated in the DEIR, significant and unavoidable traffic impacts were identified along segments of Murray Ridge Road (2017 and 2035), Franklin Ridge Road (2035), and Rio San Diego Drive (2035) and at intersections Murray Ridge Road and Sandrock Road (2035), Murray Ridge Road and the I-805 Northbound and Southbound I-805 ramps (2035), and a design hazard associated with left turns from the existing City View Church parking lot due to its proximity to the proposed project intersection at Phyllis Place and the proposed roadway.

The opinion of the commenter that the proposed roadway will “make quality of life worse” is a broad statement and is not an issue that is under the domain of CEQA unless it is attributed to a specific physical impact on the environment. The comment states opposition to the proposed project but does raise issue regarding the adequacy of the DEIR.

BI-2: The commenter expresses the opinion that the project will make traffic worse traveling both north and south on the I-805 freeway and will have significant impacts at six freeway segments. The commenter requests an explanation as to how this would improve travel.

The commenter is incorrect in stating that the proposed project would result in significant impacts at six freeway segments. As demonstrated in Section 5.2, *Transportation and Circulation*, of the DEIR, potential impacts at all study area freeway segments would be less than significant with implementation of the proposed project under both the near-term (year 2017) and long-term (year 2035) scenarios. These determinations are based on Caltrans’ Local Development – Intergovernmental Review Program Interim Guidance (Interim Guidance), which is intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. With the proposed project, VMT would be reduced within the study area and the region in the near-term and long-term. No changes to the FEIR are required.

BI-3: The commenter suggests that the project may affect sensitive receptors at Faith Community School and senior housing at City View Church.

The potential impacts of the proposed project on sensitive receptors were analyzed in the DEIR. These sensitive receptors include City View Church, as well as the City View Retirement Apartment building located approximately 300 feet west of the proposed roadway connection. Faith Community School was not identified as a sensitive receptor in the DEIR. As indicated in Section 5.3, *Air Quality*, of the DEIR, construction and operation of the proposed project would not expose

sensitive receptors to substantial pollutant concentrations. As a result, potential impacts would be less than significant. In addition, as indicated in Section 5.4, *Noise*, of the DEIR, noise from project construction activities would be temporary and would cease at the completion of the project. With implementation of mitigation measure MM-NOI-1, impacts associated with construction noise at sensitive land uses would be less than significant. Operational noise impacts at all sensitive uses would be less than significant.

BI-4: The commenter asks what time of day the studies were done, what time of year, and if school was in session.

As discussed in the Traffic Impact Study (Appendix C of the DEIR), traffic counts were originally taken during the months of May and June in 2011, and additional counts were taken in June 2013 to verify and confirm that the 2011 counts were still valid. Intersection turning movement counts were conducted during the weekday morning peak period from 7:00 AM to 9:00 AM and during the weekday evening peak period from 4:00 PM to 6:00 PM. Average daily roadway segment traffic volumes were obtained through machine data collection and were conducted over 24-hour periods.

BI-5: The commenter indicates that the project will be constructed through sensitive habitat and coastal sage.

The potential impacts of the proposed project on biological resources are analyzed, and the impacts are fully disclosed, in the DEIR. As indicated in Section 5.5, *Biological Resources*, of the DEIR, the proposed project would result in direct impacts on 0.25 acres of disturbed coastal sage scrub, which is considered a Tier II habitat under the City's Multiple Species Conservation Program (MSCP) Subarea Plan. However, mitigation measure MM-BIO-2 would be implemented to reduce impacts to less than significant levels, as the as the project would be required to ensure in-kind replacement of this sensitive vegetation community. MM-BIO-2 states that "Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, evidence shall be provided that demonstrates a total of 0.25 acre of credit from the San Diego Habitat Acquisition Fund or another approved mitigation bank (such as Marron Valley) has been acquired to mitigate the loss of disturbed coastal sage scrub (Tier II)."

From: [Carolyn Morris](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Sunday, May 21, 2017 10:45:48 PM

To the members of the City Planning Committee:

As a native of San Diego, I have witnessed an incredible amount of change to the Mission Valley landscape in the last 70+years. When I was growing up, the road through Mission Valley was less than a 2 lane road, with dairy farms, corn fields, and children's pony rides located on both sides of the road through the Valley.

BJ-1

I've always loved Mission Valley, so after selling my home in Del Cerro, I was thrilled to find a fantastic, new, award winning master planned walkable village in the heart of Mission Valley, called CIVITA. I purchased a beautiful condo here and was thrilled with the walkability of our community, with the plans for the park and recreational facilities and with the planned retail and office space. This whole concept presented a forward thinking model for future urban planning throughout the city.

Or so I, and the other 1,000 early residents of CIVITA, living along Via Alta, thought. But unfortunately, we found out that our safe, walkable urban village, is scheduled to become a conduit for freeway traffic.

Almost as shocking is the fact that the City is advancing it's plan, before the Mission Valley Community Plan Update is completed. This update should serve as the community's guide to the future development of Mission Valley. Why would the City ignore the recommendations of this important community citizen's group?

BJ-2

The Mission Valley Community Plan already states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway clearly introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

BJ-3

In addition, in the General Plan and Community Plan Amendment Manual, it states that, "To capture both the list of issues presented to the decision makers as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (pg. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection?
2. Whether the road connection could serve as an emergency evacuation route?
3. Whether it is feasible to make the road available for emergency access only?
4. Whether pedestrian and bicycle access would be improved by the street connection?

√ Why weren't these objectives, as directed by the City Council, used in the studies and

BJ-3 ↑
(cont'd) analyses?

BJ-4 I also question why Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd., were classified for the purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2 -lane collectors (multi-family) which would more appropriately fit their physical built character?

BJ-5 The Draft EIR states the connector road will "relieve" traffic from MissionCenter Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.

A. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated canyon frontage street containing only one set-back small residential complex at the base of the street?

B. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned elementary school, and dense residential complexes, all of which closely abut against the street with very little or no setback?

BJ-6 The so called connector road was initially placed into a 30 year old plan when CIVITA was nothing more than a rock quarry and it made sense THEN!

The CIVITA community was intended to be a pedestrian friendly, family oriented, smart-growth, mixed use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart-Growth village focused on walkability and limited vehicle trips. Instead of a cohesive community, this road connector will turn Via Alta and eventually Franklin Ridge Road, into dangerous, congested, polluted, noisy thoroughfares.

Why hasn't the Draft EIR proposed better solutions?

BJ-7 I sincerely hope that you will reassess your recommendations and realize that this proposed Draft EIR offers the wrong solutions for our Mission Valley community today and in the future.

Sincerely,

Carolyn Morris
Lucent Condos
8367 Distinctive Drive
San Diego, CA 9218

Letter BJ: Carolyn Morris

BJ-1: This comment provides a history of the commenter's experiences as a homeowner in San Diego, and expresses opposition to the proposed project. This comment also raises the question of why the proposed project would proceed prior to the completion of the Mission Valley Community Plan Update. Please see the responses to comments F-7 and F-8 regarding the Mission Valley Community Plan Update. The comment states the opposition to the proposed project but does not address the adequacy of the DEIR.

BJ-2: This comment excerpts a portion of the Mission Valley Community Plan referring to streets serving new development, and asks why the DEIR does not address it.

Please see the response to comment G-4.

BJ-3: This comment excerpts language from the General Plan and Community Plan Amendment Manual, and questions why the objectives outlined in it were not considered in the DEIR.

Please see the response to comment F-11 for a discussion of the project objectives.

BJ-4: This comment questions why Via Alta and Franklin Ridge Road were classified as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family).

Please see the response to comment F-3.

BJ-5: This comments states that the DEIR suggests the proposed project would relieve traffic on Mission Center Road. The commenter questions why this would be necessary and why the proposed project would divert traffic through a master planned, walkable community.

Please see the response to comment F-6 for responses to these questions. The DEIR does not explicitly state that the proposed roadway would relieve traffic from Mission Center Road, nor is it an objective of the proposed project. Please see Chapter 3.0 Project Description, for an discussion of the project objects, and Section 5.2, *Transportation and Circulation*, for a traffic analysis including existing conditions, a near-term scenario (Year 2017), and a long-term scenario (Year 2035). No changes to the FEIR are warranted as a result of this comment.

BJ-6: The commenter expresses the opinion that a freeway connection through Civita would ruin its pedestrian friendly, family-oriented, smart-growth, mixed-use character. The commenter opines Via Alta and Franklin Ridge Road would become dangerous, congested, polluted noisy thoroughfares. The comment questions why the DEIR did not propose better solutions.

Please see the responses to comments F-4, F-5, and AH-3.

BJ-7: This comment is a conclusory comment expressing the commenter's opposition to the proposed project. No further response is required, pursuant to CEQA.

From: wizzz@san.rr.com
To: [PLN_PlanningCEQA](#)
Subject: Serra Mesa Community Plan Ammendment Roadway Connection: Project:No. 265605
Date: Sunday, May 21, 2017 11:40:05 PM

May 22, 2017

Attn: Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Ave. MS 413
San Diego, Calif. 92101

Ref: Serra Mesa Community Plan Amendment Roadway Connection Project No.265605

Dear Ms. Morrison,

As you approach your final decision related to whether or not to approve the proposed changes to the Phyllis Place corridor, please be sure to take into account the following certainties:

Of the thousand or so people who live in our (unusually limited egress) kind of neighborhood, some of us, at some point, will surely face personal health crisis situations. A thousand lives is a lot of lives and 'safety wise' Phyllis Place (as our one and only 'no other choice' egress) as it now stands, has for 60+ years done the job.

However, the adding of 40+ minutes to the time it now takes us to get to Sharps Hospital will, with virtual certainty cost some of us our lives.

Example: 5 minutes vs. 45 minutes to get to Sharps Emergency Room, say for someone who is choking, the difference is likely to be the difference between life and death.

Moreover, for those of us who's only access to Phyllis Place is Abbottshill Rd., a long line of cars (like the sort of line that would correspond to a 40+ minute delay) would, with little doubt, add an incalculable number of minutes to said 40+ minutes already predicted in the EIR.

In crisis situations (say a Santa Ana season type wild fire) humans are neither known to be orderly or likely to be mindful of The Rules Of The Road. That given: Should (in that scenario) a significant number of the overwhelmingly much, much larger population of the Civita community choose to exit by way of the Franklin Ridge Rd. intersection, it would surely monopolize the only way out of our communities' much, much smaller population and block their only way out for hours. Not good!! Not fair!! Not right!!

Hopefully, (you all who have and will forever bear the responsibility that attaches to the decision) have personally visited, seen and assessed this easily predictable outcome of this Abbottshill Rd. scenario.

And finally, I ask as you prepare to cast your votes, that you will do your honest best to picture yourselves and your families as being in our position. Many of the 300 or so people living up Abbottshill Rd. are seniors.

Thank You,

Paul T. Grandi
2328 Greenwing Drive
San Diego, Ca. 92123

BK-1

Letter BK: Paul T. Grandi

BK-1: This commenter expresses opposition to the proposed project due to potential impacts to emergency access and emergency evacuation routes from an increase in traffic.

Please see response to comment BD-3. Emergency vehicles would utilize the proposed roadway connector as well as the existing routes to access members of the Civita community. It is assumed that drivers would continue to abide by the law to allow emergency vehicles quick access to their destination. Please see Section 5.2, *Transportation and Circulation*, of the DEIR, which indicates that police response times in the area will decrease (i.e., improve) compared to existing conditions. In addition, Table 5.2-23 within Section 5.2, demonstrates that accessibility to a variety of public facilities and amenities, including hospitals, would increase with the implementation of the proposed project. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter BL

From: [Gmail](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Monday, May 22, 2017 10:53:43 AM
Attachments: [Questions re Draft EIR.pdf](#)

To whom it may concern,

BL-1

I am deeply **opposed** to the Serra Mesa Community Plan Amendment Roadway Connection Project (No. 265605 SCH No. 2012011048) and have several questions about the Draft EIR that was circulated for review and comment. My questions about the EIR are attached for your consideration.

BL-2

This project will destroy the Civita community with dangerous traffic, noise, and pollution for no apparent purpose. The traffic will make it nearly impossible to safely pull out of my community onto Via Alta or walk around this lovely community. The Civita community was designed and sold as a walkable community, and this connector will destroy that vision. Moreover, there is already an existing connection between Mission Valley, Serra Mesa, and the 805 that is more than sufficient and so this new connector is entirely unnecessary.

Please **REJECT** the proposed connector.

Best,
Patrick Justman

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?
4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.
 - a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
 - b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?
5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:
 - Potential new public transit corridors to reduce vehicles;
 - Potential new Riverwalk trolley station and relocated trolley station at Mission;
 - Valley Center to increase ridership;
 - Potential new skyways to UCSD and University Heights;
 - Planned and potential new walking multi-use paths;
 - Planned and potential new cycling paths;
 - Recommendations for roadway and connectivity improvements;
 - Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

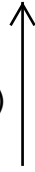
Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
 - Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
 - High traffic streets adjacent to residential has been shown to diminish quality of life;
 - High traffic streets adjacent to residential has been shown to diminish property values;
 - Impacts safe access to Civita Park;
 - Impacts safe access to Civita's future grade school;
 - Impacts safe access to Civita's future community center and dog park;
 - Easy vehicular ingress/ egress in multiple directions increases crime rates;
 - Proposed regional traffic impacts residential neighborhoods;
 - Proposed regional traffic negatively impacts property values;
 - Proposed regional traffic impacts tranquility, peace and quiet;
 - Proposed regional traffic impacts nature, air quality and biology;
 - The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
 - Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
 - Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
 - Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
 - Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).
7. *"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:*
1. *Whether police and fire response times would be improved with the road connection.*
 2. *Whether the road connection could serve as an emergency evacuation route.*
 3. *Whether it is feasible to make the road available for emergency access only.*
 4. *Whether pedestrian and bicycle access would be improved by the street connection."*

- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

BL-3
(cont'd)

BL-3
(cont'd)



- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
 - What portions of the Recirculated DEIR address the four named objectives in the resolution?"
 - Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.
-

Letter BL: Patrick Justman

BL-1: This introductory statement expresses the opposition to the proposed project. The comment indicates the commenter's questions regarding the DEIR are attached.

Please see the response to comment F-2.

BL-2: This comment expresses concerns about traffic, noise, and pollution. This comment mentions concerns pertaining to the walkability of the community. This comment also indicates a sufficient connection between Serra Mesa, Mission Valley, and I-805 already exists, but does not indicate what it is.

Please see the response to comment F-2.

BL-3: This comment contains the same comments as Letter F, the "Save Civita" letter, including concerns about compatibility of the proposed project with the Mission Valley Community Plan, traffic congestion, pedestrian safety, the safety of children at the potential future school site in Civita, and the community character.

Please see the responses to comments F-2 through F-11 of the "Save Civita" letter (Letter F). This comment does not raise a specific environmental issue, including any alternatives to the proposed project, and does not require a response. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: [Irma villavicencio](#)
To: [PLN PlanningCEQA](#)
Subject: REJECT SERRA MESA COMMUNITY PLAN AMENDMENT ROADWAY CONNECTION PROJECT.
Date: Monday, May 22, 2017 2:47:08 PM

Freeway connector do not belong within the walkable community of Civita.

When I bought my home in Via Alta , no one mentioned to me the intentions of the Franklin Ridge connect plans. The Civita map showed a dead end at the top of the hill of Via Alta.

Now, Via Alta is part of a wonderful community with a parade of residents exercising, walking, pushing strollers, carrying babies, holding toddler's hands . I can see all this activity from my balcony. It is a dream community.

You want to change it by bringing horrible traffic that is going to impact this beautiful residencial neighborhood, negative property values, no tranquility, peace and quiet, and our air quality would be harm to all the close and near by communities..

BM-1

This Civita community was intended to be pedestrian friendly, family oriented, smart growth. Any freeway connectors through this residential neighborhoods undermine the very vision of the community as a Smart Growth village focused on walkability and limited vehicles trips.

I don't need to explained to you the two -lane road Via Alta with bike pads on both sides that as of now is being use primarily for walking, cycling, dog-walking, and getting to and from our homes. And, you want to make it unsafe for everyone, with tremendous unwanted traffic, congestion, noise, pollution. It would become no longer our walkable community.

Via Alta would become dangerous, congested, polluted, noisy thoroughfares.

We wanted to continue to be a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts. Lets keep it like that, do not destroy it , that is what would happened with the uns-peakable connector road. And, what for? so some commuters save a couple minutes ...and that is debatable.

Do not destroy this beautiful city. Drivers will don't care they are going through a residential area.

Irma Villavicencio
8345 Distinctive Drive
San Diego, Ca. 92108

Letter BM: Irma Villavicencio

BM-1: The commenter states that freeway connectors do not belong in the walkable community of Civita and that the proposed roadway was not depicted on the Civita map. The commenter expresses general concerns that the increased traffic in the neighborhood will reduce property values, tranquility, peace and quiet, and impact air quality.

The proposed roadway connection is not a “freeway connector,” but rather provides a multi-modal linkage between the Serra Mesa and Mission Valley communities. The project would provide a roadway with two intersections, sidewalks, and Class II bicycles lanes, all designed in accordance with the City of San Diego’s Street Design Manual (2002). Pedestrian access would be provided to/from Serra Mesa and Mission Valley and crossings at the two proposed intersections.

This comment expresses general concerns regarding the effects of increased traffic on property values, tranquility, peace and quiet, and air quality, but does not raise issue regarding the adequacy of the DEIR. Please see Sections 5.2, *Transportation and Circulation*, and 5.3, *Air Quality*, of the DEIR. As indicated in Section 5.2, the proposed project would not result in any significant traffic impacts along Via Alta. Additionally, as indicated in Section 5.3, potential air quality impacts were determined to be less than significant.

The commenter’s concerns regarding decreased privacy, peace and tranquility, and property values are broad statements and are not issues that are under the domain of CEQA unless attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. Please see response to comment F-2.

BM-2: The commenter states that Civita was intended to be pedestrian friendly, family oriented, smart growth, and that any freeway connectors will undermine Civita’s vision to focus on walkability and smart growth.

Please see the responses to comments F-2, F-4, and F-5. The comment states opposition to the proposed project, but does not raise issue regarding the adequacy of the DEIR.

BM-3: The commenter suggests that Via Alta will become unsafe, congested, polluted, and noisy. The commenter expresses opposition to the proposed project and does not want the project to go through the Civita neighborhood.

Please see the responses to comments F-2 through F-5.

From: [Julius Faulkner](#)
To: [PLN_PlanningCEQA](#)
Subject: CIVITA EIR
Date: Tuesday, May 23, 2017 7:38:56 PM

BN-1

Is this plan being used to help out "Soccer City"? What effect will this plan have on housing values and crime rates?

Julius Faulkner

7893 Stylus Dr., San Diego Ca 92108

Letter BN: Julius Faulkner

BN-1: The commenter questions whether the proposed roadway connection is being used to help “Soccer City,” and asks what its effects will be on housing values and crime.

Please see the response to comment F-2. Additionally, the commenter has not provided any substantial evidence as to how a roadway connection will increase crime or why crime would result in a physical impact on the environment. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: [julie.kawakami](#)
To: [PLN.PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project/Franklin Ridge/Phyllis Place freeway connector project No. 265605 SCH No. 2012011048
Date: Tuesday, May 23, 2017 6:17:19 PM

Dear City of San Diego Environmental Planner and others

BO-1

I would like to express my absolute discontent with the plan of having the I-805 freeway connector at Phyllis Place to the top of Franklin Ridge Rd. I object to this freeway connector proposal for the following reasons:

BO-2

- Both Via Alta and Franklin Ridge Rd are 2-lane streets passing through residential neighborhoods which are highly used by walkers, strollers, dogs, runners, cyclists, etc. every day.
 - These two streets and neighborhoods were not built to accommodate the projected Average Daily Trips of 34,000+.
 - I disagree with the March 2017 Environmental Impact Report (EIR) statement that this connector would have "less than significant impacts with implementation of mitigation measures" on noise, neighborhood character and pollution. The increase in high traffic flow will ruin the homeowners living along affected streets including Via Alta and Phyllis Place with the increased noise and air pollution, and increase risk of accidents. There are front doors, balconies, bedrooms only a few feet off of Via Alta.
 - Vehicles will be backed up and down the hill from Serra Mesa to Mission Valley during rush hour and Qualcomm stadium events due to the single lane in each direction.
 - The walkability factor of Civita, which is what this community was built on, will significantly decrease with more vehicles on its residential roads. It will be difficult for pedestrians to cross Via Alta and Franklin Ridge with the high volumes of traffic and increase danger to those frequently stroll these streets.
 - Civita Park, the heart of the community, will be less accessible by the neighbors. The high traffic flow will deter people from walking to the park and may even cause others to drive instead. This is the complete opposite of what this new city within the city was meant to do.
- Mission Center Rd is already a currently adequate 4-lane route between Serra Mesa and Mission Valley with much of it through an open unpopulated canyon and thus, more room for potential expansion. The EIR doesn't make sense as to why diverting traffic from here to a densely populated neighborhood with a planned school, would be a smart improvement. Could you please explain this?
- Easy entry and exit via the freeway connector will increase local crime.

BO-3

Please take into serious consideration the detrimental effects this connector will have on our communities. It will not alleviate traffic much more because these roads were not meant to hold the number of vehicles projected to pass through Civita and will clog our streets.

The only reason I considered Civita was because of its support of a walkable community. I could have and would have chosen to live elsewhere if I had known that it would be developed into yet another suburb promoting car/truck use more than walking and bicycles.

BO-3
(cont'd)

↑ I fear Civita will turn into another Bachman Pl. (Mission Valley to Hillcrest) with it's 2-lane street, traffic backed up through residential neighborhoods as is also a similar case with Capricorn Way in Mira Mesa during rush hour. Since we have the power to decide now, let us prevent these mistakes from happening again.

I would love for the SD community planning board to focus on and support things that promote alternatives to cars, freeways, and pollution such as the Bicycle, Pedestrian, Emergency Access Only alternative. I already walk to the trolley when possible but do not always feel safe walking along the busy wide streets of Mission Valley. Suggestions such as safer walking paths (e.g. a bridge over Friars Rd for easier access to the trolley station and local shopping), wider mass transit would be better serve San Diego and the local community rather than a plan that will deter city residents from enjoying the local area that they support.

Thank you,

~Julie Kawakami~

Letter BO: Julie Kawakami

BO-1: The commenter expresses opposition to the proposed project.

Please see the response to comment F-2.

BO-2: The commenter provided examples of potential traffic-related issues due to the proposed project, including impacts to noise, air pollution, and walkability. The commenter also expresses the opinion the proposed project would increase local crime.

The comment expresses opposition, but does not provide evidence supporting the issues raised. Please see the responses to comments F-4, F-5, O-1, and R-1 regarding concerns about impacts to community character, walkability, noise, pollution and crime.

BO-3: The comment is a conclusory statement restating the commenter's opposition to the proposed project and expressing support for the Bicycle, Pedestrian, and Emergency Access Only Alternative.

Please see the response to comment F-2.

From: [Pat & Cindy Canfield](#)
To: [PLN PlanningCEQA](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection;Project:Project No.265605
Date: Wednesday, May 24, 2017 6:04:51 AM

Good Day -

BP-1

I am writing to let you know that my husband and I are strongly opposed to the Franklin Ridge Road that is being proposed to connect Civita to our Phyllis Place area of Serra Mesa. If built, it will have a detrimental impact on our neighborhood -more traffic and traffic lights, noise, air pollution, chopping the proposed new park in half, and long wait times to get on the 805 freeway. It is unbelievable that a project of this size was approved without the traffic issues being properly planned for and dealt with. It seems that this is someone's idea of an easy solution. The longtime taxpaying, voting residents of this community (both Serra Mesa and Civita) will not stand by and let our neighborhood be destroyed. Please consider other ways of solving this problem - how about not continuing to build more and more housing units until proper traffic solutions have been found?

Thank you -

Cindy and Pat Canfield
Serra Mesa Residents for 24 years

Letter BP: Cindy and Pat Canfield

BP-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding additional traffic, noise, air pollution, and loss of park space. The commenter also states that it is unbelievable that a project of this size [Civita] was approved without traffic issues being addressed.

Please see the response to comment F-2. All of the general environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please refer to Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, and 7.9, *Recreation*, of the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: [Cindy](#)
To: [PLN PlanningCEQA](#)
Cc: [Saidkhanian, Liz](#); [Mayor Kevin Faulconer](#); [CouncilMember Lorie Zapf](#); [Councilmember Scott Sherman](#); [Councilmember Barbara Bry](#); [Councilmember Christopher Ward](#); [CouncilMember Chris Cate](#); [CouncilMember David Alvarez](#); [Councilmember Myrtle Cole](#); [Councilmember Mark Kersey](#); [SDAT City Attorney](#)
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project Project No. 265605
Date: Wednesday, May 24, 2017 9:23:35 AM
Attachments: [Response to SMCP Amend DEIR - 2017.pdf](#)

BQ-1 | Attached is my letter of response.

Cindy Moore
Serra Mesa resident

May 24, 2017

RE: Serra Mesa Community Plan Amendment Roadway Connection Project, Project No 265605

Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

BQ-2 I've read and concur with the Serra Mesa Planning Group's response letter to the Recirculated DEIR. The items listed in this letter are ones that were not covered or discussed comprehensively in the Serra Mesa Planning Group letter.

Community Plan Conflict (Mission Valley Community Plan available at https://www.sandiego.gov/sites/default/files/mission_valley_cp_060613_0.pdf)

BQ-3 The Recirculated DEIR has emphasized that there is a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan. However, the following statement, not included in the Recirculated DEIR, from the Sand and Gravel Re-use Development Section (p. 56) of the Mission Valley Community Plan is consistent with the Serra Mesa Community Plan: "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan.

Explain why this line which would provide full information to the decision makers wasn't included in the Recirculated DEIR.

Purpose and Project Description

The City Council in October 2008 in Resolution 304297 directed staff to analyze issues related to

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

The focus of the City Council's resolution is on safety and pedestrian and bicycle access.

BQ-4 The City studied these objectives for the proposed project:

- Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
- Improve local mobility in the Serra Mesa and Mission Valley planning areas.
- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on and off-ramps for the surrounding areas.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

Most of the City's objectives focus on mobility and traffic congestion.

The Final Program Environmental Impact Report for the Quarry Falls Project, page 10-40, states that the "...the redistribution of traffic to the Phyllis Pace/I-805 interchange is beneficial to existing Mission Valley circulation streets where total vehicular trips are reduced, such as for Friars Road between SR-163 and I-15; and Qualcomm Way from Friars Road to I-8."

Given that the

BQ-5

- *Focus of the objectives that were studied in this Recirculated DEIR focused on mobility and traffic congestion*
- *Line in the Mission Valley Community Plan regarding the reference that a major street should not be connected to the mesa wasn't mentioned*
- *FPEIR for Quarry Falls discusses the benefits of the street connection to Mission Valley circulation*

Is the underlying purpose of the project to provide access to I-805 and relieve congestion on Mission Valley roads, especially since there are so many approved or proposed projects for Mission Valley?

If the real purpose is to benefit Mission Valley circulation, the traffic study wasn't comprehensive, including the appropriate Mission Valley roads and the adjacent ones, e.g., Texas Street.

Recirculated DEIR in relationship to the resolution

BQ-6

- An in-depth study of police and fire response times was not conducted. Instead personal communication with the San Diego Police Department and the San Diego Fire-Rescue Department was provided.
- The emergency access from the existing Kaplan Drive in Mission Valley and Aperture Circle wasn't mentioned.
- Pedestrian and bicycle access from the existing Kaplan Drive in Mission Valley and Aperture Circle wasn't mentioned.
- The mandated trail for bicycle and pedestrian access from Civita to Phyllis Place Park wasn't described.

By not including pertinent information in the project description appropriate studies were not conducted to provide the City Council with the information that they need for making a decision on the issues that were listed in the resolution. Examples: What would be the impact of a roadway connection on response times that increases the ADTs on Phyllis Place from 2,420 (existing) to 34,540 (2035) or freeway ramps that operate at an acceptable level of <15 minutes (existing) to 31 minutes (2035)? The studies didn't evaluate these items.

If the pertinent information listed in this section were included, what impact would it have on the analyses that were conducted and the conclusion reached in this Recirculated DEIR?

Land Use

BQ-7

"Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding (UD-B.5.e)." Discuss traffic calming measures that will be used on the redesign of Phyllis Place, Franklin Ridge, and Via Alta.

BQ-8

"Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur (for example, development of a designated school or park site with a more intensive land use could result in traffic impacts)." (p. 46, Significance Determination Thresholds, City of San Diego, July 2016) The street connection will divide a planned and designed park in two and have significant traffic impacts on the park, e.g., safety issues. If this information were included, would a deviation or variance be required?

Transportation/Circulation and Parking

- BQ-9 | Discuss the impact a steep grade street connection that increases ADTs (existing and 2035) from 2,420 to 34,540 (2035) will have on the Phyllis Place egress and ingress and pedestrian connectivity.
- BQ-10 | Proposed Amendment Study Area: This is an amendment for the Serra Mesa Community Plan. As shown in Figure 5.2-1 the study area didn't include the eastern area of Serra Mesa. However, Northside Drive located in Mission Valley is approximately the same distance to the connection at Phyllis Place as is Qualcomm Stadium via Mission Village Drive. The residents of the eastern area of Serra Mesa who access I-805 will be impacted by the roadway connection. Will the eastern area of Serra Mesa be added to the study and analyses made? If not, provide an explanation for the exclusion.
- BQ-11 | "The Near-Term Scenario (Year 2017) does not assume that the SR-163/Friars Road interchange or Hazard Center Road extension would be constructed, but other regional improvements beyond the study area are included in SANDAG's model." (p. 5.2-18) What does this statement mean? SR-163 is scheduled to begin Phase 1 construction in 2017.
- BQ-12 | ADTs will increase tremendously on Murray Ridge between Mission Center and I-805 N with and without the street connection (Chapter 5.2).
- Discuss the traffic impacts on the residents located west of Murray Ridge Road (e.g., Converse, Chenault, Encino, and residents near the I-805 N on-ramp) for with and without the street connection alternatives. For example, making a left hand turn onto Murray Ridge Road when exiting their street. If discussion isn't included, provide an explanation for the exclusion.
 - Discuss mitigation measures that could help with the impacts (e.g., traffic signal on demand). If discussion isn't included, provide an explanation for the exclusion.

Noise

- BQ-13 | The Final Program Environmental Impact Report for the Quarry Falls Project, Appendix D, determined the following noise levels with the street connection: Franklin Ridge/Via Alta-Phyllis Pl, 72.0 db CNEL (build-out); Phyllis Place south of I-805 SB ramp, 72.7 db CNEL (build-out). While the Serra Mesa Community Plan Amendment Roadway Connection Project DEIR lists residential adjacent to Via Alta (R11) as 63 db (long term with project) and Church adjacent to Phyllis Place as 62 db CNEL (this is the site that is most comparable to Phyllis Place south of I-805 SB ramp) [Table 5.4-8]. There is a tremendous difference between these two sets of data. Explain the contradiction. Given the discrepancy will a new study be conducted? If not, provide an explanation for not conducting a new study.
- BQ-14 | According to the Final Program Environmental Impact Report for the Quarry Falls Project, page 5.5-9, "For typical San Diego auto/truck and day/night traffic mixes, the 65 db CNEL contour distance from the roadway centerline extends as follows... 300 feet for 30,000 ADTs." Franklin Ridge Road from Via Alta to Phyllis Place will have 34,117 ADTs (2035 with project). There are 56 multifamily retirement homes located at the City View Church site across from the street connection. If any of the questions listed below aren't answered, please provide an explanation for the exclusion.
- How many feet is the street connection from the closest unit?
 - Will any of the units be impacted by noise from the street connection?
 - What will be the noise level in front of these retirement homes adjacent to Phyllis Place?
 - Will this noise be significant?
 - Will mitigation measures be required to meet the City's interior 45 db CNEL noise level?
 - If so, describe the mitigation measures and the responsible party for any mitigation that's needed.

- BQ-15 | What would be the noise cumulative impact from the Phyllis Place and Franklin Ridge Road traffic on the 56 multifamily retirement homes located at the City View Church site?
- BQ-16 | The connection will divide Phyllis Place Park in two. In the City's Significant Determination Thresholds, p. 51 at https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf, under General Indication of Potential Significance is this statement: "Structure or outdoor useable area²³ is <50 feet from the center of the closest (outside) lane on a street with future ADTs > than 7500." Each section of the park is within 50 feet of the roadway connection and the ADT will be greater than 7500. The impact of noise on Phyllis Place Park hasn't been discussed in this Recirculated DEIR. If any of the items listed below aren't answered, provide an explanation for the exclusion.
- What will be the noise level at this park?
 - Will this park be exposed to outdoor noise that exceeds what is allowed for in the Municipal Code 59.5.0402, and defined in the Significance Determination Thresholds (p. 51) as 65 db CNEL?
 - Discuss the mitigations that would be needed to reduce the traffic noise to less than significant levels.

Cumulative Impacts

Pertinent CEQA Guidelines

- BQ-17 |
- "The cumulative impact from several projects 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 probably future projects (15355)." (Available at <http://resources.ca.gov/ceqa/guidelines/art20.html>.)
 - Indirect or secondary effects that are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems [15358(a)(2)]." (Available at <http://resources.ca.gov/ceqa/guidelines/art20.html>.)
 - "...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 that would remove obstacles to population growth...[15126.2(d)]." (Available at <http://resources.ca.gov/ceqa/guidelines/art9.html>.)

Questions relating to the Pertinent CEQA Guidelines

- BQ-18 |
- Are there any Mission Valley present or future projects outside of Civita where the residents or employees would be likely to use Qualcomm Way and Franklin Ridge Road or Civita Blvd and Via Alta to access the Franklin Ridge Road connection? Would this create a cumulative impact on the environment (e.g., traffic, air quality, and noise)?
 - Are there any Mission Valley or Serra Mesa or Grantville or Kearny Mesa proposed or future projects where a street connection would allow greater density or greater growth than without the street connection? If so,
- BQ-19 |
- Describe the projects.
 - Describe the direct and indirect impacts.
 - Describe the cumulative impacts.
- BQ-20 |
- Are there any other direct and indirect impacts? If so, describe them.

Mitigations

BQ-21 “In practice, drafting a good mitigation measure involves clearly explaining its objectives – specifically how it will be implemented, who is responsible for its implementation, where it will occur and when it will occur...To be considered adequate, mitigation measures should be specific, feasible actions that will actually improve adverse environmental conditions...Mitigation measures consisting only of further studies or consultation with regulatory agencies that are not tied to a specific action plan may not be adequate and should be avoided.” (Available at <http://www.calrecycle.ca.gov/swfacilities/permitting/CEQA/Documents/MRMP/default.htm>)

Mitigation Issues (refer to guidelines listed above):

- BQ-22 • Aren’t adequately described – Example:
 - Phyllis Place from Franklin Ridge Road to I-805 SB Ramp indicates “shall be reconfigured to accommodate 5 total lanes...” This description doesn’t indicate where the additional space will be acquired to widen the road.
- BQ-23 • Secondary impacts of mitigation measures aren’t described or discussed – Example:
 - Phyllis Place from Franklin Ridge Road to I-805 SB Ramp indicates “shall be reconfigured to accommodate 5 total lanes...” If the reconfiguration requires the removal of parking spaces in front of the Phyllis Place Park, what will be the impact on ADA accessibility?
- BQ-24 • Doesn’t improve environmental conditions – The mitigations for Serra Mesa roadway segments create additional environmental impacts. Example:
 - Restripe Murray Ridge from Mission Center Road to Sandrock Road to 4-lanes will remove bike lanes. If it were implemented it would create tremendous impacts on the residents – difficulty exiting driveways, greater traffic, and potential for more traffic related noise, and air pollution.
- BQ-25 • How, Who, and When – It’s not included for each mitigation measure how it will be implemented, who is responsible for implementation, and when it will occur. Provide a discussion of each of these areas for each mitigation measure. A chart with the criteria for each of the mitigations would be helpful.

Discuss mitigation issues. If not discussed, provide an explanation for the exclusion.

According to CEQA Guidelines, 15370, (available at <http://resources.ca.gov/ceqa/guidelines/art20.html>.)

“Mitigation includes:

- BQ-26 (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.”

Some of the mitigation measures may make the situation worse for affected residents. Discuss the impacts of the mitigation measures on these residents, especially residents along Murray Ridge Road and in the Abbotshill area. If not discussed, provide an explanation for the exclusion.

Alternatives Considered but Rejected

The objectives that were described by the City Council are not the ones that were studied. The City has selected a different set of objectives. Also, the Recirculated DEIR redefined the objectives that were described in the DPEIR. By redefining the objectives the DEIR has precluded the “No Build/Remove from Mission Valley Community Plan Alternative” from meeting a strict interpretation of the objectives. Consequently, this alternative was considered but rejected and wasn’t studied. However, this alternative could have a lesser impact on the environment (for a detailed discussion, refer to the Serra Mesa Planning Group’s letter).

Revisions in Objectives:

In the DPEIR an objective was “Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.” The Recirculated DEIR replaced the phrase “as it pertains to the connection” with “by providing a multi-modal linkage from Friars Road in...” By changing the phrase from connection to multi-modal the “No Build/Remove from Mission Valley Community Plan Alternative” could not meet a strict interpretation of this objective since multi-modal implies a vehicular option. Connections exist between Mission Valley and Serra Mesa with Mission Center Road, Mission Village Drive, and the emergency access at Kaplan Drive in Serra Mesa and Aperture Circle in Civita (Mission Valley).

If the phrase “as it pertains to the connection” had been retained and the line from the Mission Valley Community Plan “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas” were considered, would the “No Build/Remove from Mission Valley Community Plan Alternative” meet this objective? If not, provide an explanation.

In the DPEIR an objective was “Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Pace Road into Mission Valley, that if developed in the future, could: Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas.” The DEIR replaced the phrase “Improve the overall circulation network” with “Improve local mobility”. Local mobility exists with Mission Center Road and Mission Village Drive. The analysis made by the Serra Mesa Planning Group confirms that local mobility will worsen in Serra Mesa with the roadway connection.

Given this analysis if the “No Build/Remove from Mission Valley Community Plan Alternative” were compared to “with roadway project”, would the “No Build/Remove from Mission Valley Community Plan Alternative” meet this objective?

Furthermore, if the purpose of the roadway connection is to benefit Mission Valley circulation and relieve congestion, the objective to “Improve local mobility” is inaccurate.

In the DPEIR an objective was “Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.” This objective was removed. A trail for bicyclists and pedestrians is mandated with or without the roadway connection. Also, the existing emergency access at Kaplan and Aperture Circle provides bicycle and pedestrian access. By removing this objective, the “No Build/Remove from Mission Valley Community Plan Alternative” alternative could not meet this objective.

Given that a trail for bicyclists and pedestrians from Civita to Phyllis Place Park is mandated would the “No Build/Remove from Mission Valley Community Plan Alternative” meet this objective if it had been retained?

By changing the objectives from the mandated ones in the City Council resolution and by not including pertinent information, the City seems to have created a prejudicial situation that preempted the No Build/Remove from the Mission Valley Community Plan Alternative from receiving a warranted and complete environmental review.

BQ-33 | As further proof of the City's prejudicial position the Planning Department made a presentation to the Mission Valley Planning Group on May 3, 2017 and to the Serra Mesa Planning Group on May 18, 2017 and in slide 3 under Reasons for Recirculation is this statement, "Reasonably foreseeable that construction of the roadway will occur."

BQ-34 | I've been involved with this issue since 2004. The City Council's Resolution in 2008 (refer to the Serra Mesa Planning Group's letter, Addendum, p. 2 of 13) directed staff to analyze issues related to safety and pedestrian and bicycle access and "indicated that this initiation of a community plan amendment in no way confers adoption of a plan amendment." The Serra Mesa Planning Group's letter indicates that the issues were not objectively analyzed. The City does a disservice to the community when it doesn't follow the mandates of the City Council, resulting in an erosion of trust between the City and the community.

BQ-35 | Furthermore, the impacts of the roadway connection (if approved) on our Civita neighbors located at Via Alta and the future development on Franklin Ridge Road is reminiscent of the traffic impacts on the residents of Murray Ridge Road between Mission Center Drive and the I-805 ramps. These Murray Ridge residents contend daily with noise, air pollution, and the challenges of exiting their driveways. The situation they encounter should not be repeated in another community.

I look forward to reading the Comment Letters and Responses. Please add my name and email address, c.a.moore@sbcglobal.net, to the list to receive any future updates, notices, or documents on this item. Thank you!

Sincerely,

A handwritten signature in cursive script that reads "Cindy Moore".

Cindy Moore
Serra Mesa resident

Letter BQ: Cindy Moore

BQ-1: This is an introductory comment that states that detailed comments are attached within the email. No specific comments that require a response are raised by this comment.

BQ-2: This comment states that the commenter has reviewed and concurs with the comment letter submitted by the Serra Mesa Planning Group (SMPG) and states that this letter provides additional comments not covered by the letter submitted by the SMPG. The comment letter submitted by the SMPG included as Letter G within this FEIR; please see the responses to the comments provided therein. Moreover, comments provided in this letter, in certain cases, are identical to the comments provided in Comment Letter G; as such, several responses refer the comment to the responses to Comment Letter G. No specific comments that require a response are raised by this comment.

BQ-3: Please see the response to comment G-4.

BQ-4: Please see the response to comment G-14.

BQ-5: This comment excerpts a portion of the Quarry Falls PEIR, not the DEIR for the proposed project. The excerpt is referring to Alternative 4 of the Quarry Falls PEIR, which included the proposed roadway connection, and states that it would be beneficial to circulation streets within Mission Valley. This comment also asks if the underlying purpose of the project is to provide access to the I-805 and relieve congestion within Mission Valley. It also states, if that is the case, that the traffic study was not comprehensive as it did not include the appropriate Mission Valley roads.

As set forth in Section 15124(b) of the CEQA Guidelines, a statement of the objectives sought by the proposed project is required to be included within the Project Description section of an EIR. This section also states: "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project, which is to provide a project that improves mobility between the Serra Mesa and Mission Valley Planning areas, improves regional access, improves emergency access and evacuation routes within the Serra Mesa and Mission Valley planning areas, provides safe and efficient multi-modal mobility, and resolves the inconsistency between the two community plans. The DEIR complied with CEQA's requirements and the objectives are included within Section 3.1 of Chapter 3, *Project Description*, of the DEIR.

Concerning the comment regarding the traffic impact study area, Section 5.2.1.1 of the DEIR details the methodology used to determine the traffic impact study area: Transportation and circulation related to the proposed project would affect roadway segments and intersections surrounding the project site under the jurisdiction of the City of San Diego. It would also affect metered freeway ramps and freeway mainline segments under the jurisdiction of the California Department of Transportation (Caltrans). As such, the study area was defined according to the City's Traffic Impact Study Manual (1998) requirements. The Traffic Impact Study Manual requires that a study area include all roadway segments, intersections, and freeway segments where the project would contribute 50 or more peak hour trips in either direction. Figure 5.2-1 shows the project study area roadway segments and intersections. The traffic study area that was analyzed consists of 29

roadway segments, 19 existing and 5 future intersections, 3 freeway mainline segments, and 2 metered freeway ramps. The traffic study area is bordered generally by Aero Drive to the north, Rio San Diego Drive to the south, and Mission Center Road and Northside Drive to the west and east, respectively.”

The comment generally mentions roads within Mission Valley should have been studied. The DEIR did analyze numerous roadways within Mission Valley where the project would contribute 50 or more peak hour trips in either direction, in compliance with the City’s Traffic Impact Study Manual. Relatedly, the comment asks why Texas Street was not analyzed. The project would not add 50 or more peak hour trips to Texas Street and therefore was not required to be analyzed according to the City’s Traffic Impact Study Manual. No revisions to the FEIR are warranted as a result of this comment.

BQ-6: This comment states that an in-depth study of police and fire response times was not conducted; that emergency and pedestrian/bicycle access from the existing Kaplan Drive in Mission Valley and Aperture Circle wasn’t mentioned; and that the mandated trail for bicycle and pedestrian access from Civita to Phyllis Place Park wasn’t described. This comment also states that by not including pertinent information in the project description, appropriate studies were not conducted to provide the City Council with the information that they need for making a decision on the issues that were listed in the resolution. It also states that increased congestion on Phyllis Place would affect emergency response times.

Fire and police services are analyzed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR (see Section 7.7). There was no requirement within the City Council Resolution to conduct an in-depth study of police and fire response times. As detailed within Section 7.7, the proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for fire-rescue services. As confirmed with the San Diego Fire-Rescue and San Diego Police Departments, additional access points (such as the proposed roadway connection) generally improve emergency access and response times. Furthermore, as detailed in Table 8-1 of Appendix C to the DEIR, the proposed project would increase fire response times by an average of 9 minutes within the vicinity of the project site.

It is acknowledged that emergency access exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive and that Kaplan Drive provides bicycle and pedestrian access. This clarifying information has been added to the FEIR (see Chapter 2, *Environmental Setting*). The addition of this information does not affect the conclusions reached within the DEIR. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection. Moreover, the analysis related to emergency response did include Kaplan Drive as emergency access, and the results indicated that emergency access with the proposed project would improve compared to the existing condition. Please also see Table 8-1 within Appendix C.

A figure within the Quarry Falls PEIR and Specific Plan shows a trail connection between the Quarry Falls development and the Phyllis Place Park. This figure has been added to the FEIR (see Chapter 3, *Project Description*, Figure 3-10). The addition of this information does not affect the conclusions reached within the DEIR.

Finally, the City disagrees with the commenter's allegation that the DEIR does not include pertinent information to provide the City Council with the information that they need for making a decision on the issues that were listed in the resolution. The four questions needing resolution as set forth by the City Council (Staff Recommendation Number 6) to the Quarry Falls project approval are detailed on page 3-2 of Chapter 3, *Project Description*, of the DEIR. These four questions formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*. Each of these questions are answered within relevant sections of the DEIR. The first and second questions are analyzed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR (see Section 7.7 for fire-rescue and police services; see Section 7.4 for emergency evacuation). The third question is analyzed in Chapter 9, *Alternatives*, of the DEIR as "Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative" (see Section 9.5.2). The fourth question is analyzed within Section 5.2, *Transportation and Circulation*, of the DEIR (see Section 5.2.8).

As detailed above, some of the information raised by the commenter and others has been incorporated into the FEIR (such as emergency access on Kaplan Drive and the trail connection from Quarry Falls). However, this clarifying information does not change the substantive analyses that were conducted, nor does it affect the conclusions reached in the DEIR for the reasons detailed above.

Finally, the comment describes traffic conditions on a segment of Phyllis Place Road, from Franklin Ridge Road to the I-805 southbound ramp for the Year 2035 condition (DEIR Table 5.2-16), as well as the delay on the I-805 SB on-ramp at Murray Ridge Road in Year 2035 (DEIR Table 5.2-18), and asks how traffic congestion would affect emergency response times. Vehicles would have to pull over to the right-hand side of the road when an emergency vehicle approaches on the roadway, as required by law. The numbers referenced by the commenter are Average Daily Traffic (ADT) and therefore would be distributed throughout the day, not at the same time that would in turn cause an emergency vehicle to not be able to pass through.

BQ-7: This comment excerpts policy UD-B.5.e from the Urban Design Element of the General Plan that states to design new streets and consider traffic calming where necessary, to reduce neighborhood speeding. This comment also states to discuss traffic calming measures that will be used on the redesign of Phyllis Place, Franklin Ridge, and Via Alta.

Franklin Ridge Road and Via Alta would not be redesigned under the proposed project, although intersection controls would be warranted. As detailed in Chapter 3, *Project Description*, of the DEIR: "The proposed project would require a signalized intersection at Phyllis Place. Figure 3-8 shows the cross-section of a standard four-lane major intersection; this would guide the final design for the area where the new roadway would adjoin Phyllis Place. Intersection control would also be required where the proposed roadway would meet Franklin Ridge Road and Via Alta, which are classified as modified two-lane collectors with left-turn pockets. The intersection would be similar to that illustrated in Figure 3-8." Phyllis Place would not warrant traffic calming measures, as the classification of Phyllis Place (as defined by the Serra Mesa Community Plan) is a four-lane major street, which would have the ADT capacity for 40,000 trips (as detailed in Chapter 3) and is not through a neighborhood.

With regards to traffic calming measures along Via Alta and Franklin Ridge Road, according to the Quarry Falls Specific Plan: "The street system for Quarry Falls was designed to achieve a high degree of compatibility between vehicles, pedestrians, and bicyclists." It also states: "The Quarry Falls land use design and circulation plan do not include the alignment of a northern street connection to

Phyllis Place. The project design does not preclude such a connection and therefore is consistent with the Transportation Element of the Mission Valley Community Plan. Should the Serra Mesa Community Plan be amended at a future date to include the road connection, such an action would be found to be consistent with the Quarry Falls Specific Plan and therefore not require an amendment to this plan.”

The commenters request to include traffic calming measures with regards to the proposed roadway. The proposed roadway and access points have been conceptually designed to be consistent with the City’s Street Design Manual (2002) and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection. The City’s Street Design Manual contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way and for the safe design of intersections. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the Street Design Manual. During final design of the proposed roadway, the City will determine whether traffic-calming measures are necessary to ensure pedestrian safety. In addition, as with any roadway in the City, citizens can contact the relevant City department if speeding is noticed on a frequent basis. The relevant City department will work with concerned citizens regarding possible solutions. No changes to the FEIR are required in response to this comment.

BQ-8: This comment excerpts a portion of the City’s Significance Determination Thresholds and states that the proposed project will divide a planned and designed park in two and have significant traffic impacts on the park, such as safety issues. This comment also asks that if this information were included, if a deviation or variance would be required.

As detailed in Chapter 3, *Project Description*, of the DEIR, Phyllis Place Park is a proposed linear park that would be located on the southern side of Phyllis Place. If the proposed roadway connection is constructed, Phyllis Place Park would be bisected and would consist of a 1.33 total acre linear park for passive use activities. As shown in Figure 3-5a of the DEIR, there are two relatively small children’s play areas within Phyllis Place Park that would be located approximately 300 feet to the west of the proposed roadway intersection. The intersection would be designed in accordance with the Street Design Manual and would include pedestrian crossings. The potential for safety issues associated with the proposed project is detailed in Section 5.2, *Transportation and Circulation*, of the DEIR. As the project would include pedestrian and bicycle facilities, including an intersection crossing, the project would not create a barrier between the east and west portions of the park. Although the park would be bisected, this would not result in a deviation or variance from development regulations. All significant environmental impacts as a result of the project are disclosed within the DEIR (see Table S-1). No changes to the FEIR are warranted as a result of this comment.

BQ-9: The comment requests the City to discuss the impact of the proposed grade and the increase of Average Daily Trips (going from 2,450 to 34,540 by 2035) on egress and ingress on Phyllis Place and pedestrian connectivity.

All of the potential transportation and circulation impacts of the proposed project are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts of the proposed project. This comment does not specifically raise issues concerning the adequacy of the DEIR. Please also see the responses to comments F-4

and F-5 regarding pedestrian safety and connectivity. Safety related issues such as those raised by the commenter will be addressed at the design level.

BQ-10: The comment indicates that the transportation study area did not include the eastern portion of Serra Mesa, but notes that the Northside Drive is located in Mission Valley approximately the same distance to the connection at Phyllis Place as is Qualcomm Stadium via Mission Village Drive. The comment asks if the eastern area of Serra Mesa will be added to the study area and subsequent analysis conducted. Commenter expresses concern about the project study area. Please see response to comment G-70 regarding the project study area.

BQ-11: The comment asks what the following statement means: “The Near-term Scenario (Year 2017) does not assume that the SR-163/Friars Road interchange or Hazard Center Road Extension would be constructed, but other regional improvements beyond the study area are included in SANDAG’s model.

Please see the response to comment G-62 regarding the SANDAG model. Further, since the SR-163/Friars Road interchange is scheduled to begin Phase 1 construction in 2017, it is reasonable to expect that the project would not complete construction by the end of 2017, and therefore, was not included in the 2017 roadway network.

BQ-12: The comment notes that ADTs will increase on Murray Ridge Road with and without the project. The commenter asks the City to discuss the traffic impacts on residents located west of Murray Ridge Road. The comment also asks that mitigation measures be discussed that would help with these potential impacts. The DEIR adequately address impacts to roadway segments and intersections per CEQA guidelines. Several mitigation measures along Murray Ridge Road would not be implemented as they would result in the loss of Class II bike lanes or on-street parking, as adequately detailed within the DEIR.

BQ-13: The commenter notes there is a tremendous difference between the data provided in the Final Program EIR for the Quarry Falls Project and the DEIR for the proposed project. The commenter asks that the City explain the contradiction.

The Quarry Falls PEIR relied on a noise impact analysis prepared approximately 10 years ago (June 7, 2007) that was based on the project description and data available at that time. The noise levels of 72.0 dB CNEL and 72.7 dB CNEL mentioned in the comment refer to the PEIR’s predicted traffic noise levels at a reference distance of 50 feet from the centerline of the roadway. The recirculated DEIR analyzes noise levels at specific noise-sensitive receptors using actual setbacks from roadways (approximately 150 to 200 feet) rather than a fixed distance of 50 feet. Another important difference between the two analyses is that the Quarry Falls PEIR used a previous version of the federal roadway noise prediction model (FHWA-RD-77-108), whereas the recirculated DEIR used the current traffic noise model TNM version 2.5. The recirculated DEIR provides the most up-to-date traffic noise analysis based on the most recent available data. Subsequently, no changes to the FEIR are warranted as a result of this comment.

BQ-14: The commenter summarizes a statement related to noise and distance from the Final Program Environmental Impact Report for the Quarry Falls Project and notes that Franklin Ridge Road from Via Alta to Phyllis Place will have 34,117 ADTs (2035 with project). The commenter is concerned with the 56 multifamily retirement homes located at the City View Church site across from the street connection and asks the following questions:

- How many feet is the street connection from the closest unit?

- Will any of the units be affected by noise from the street connection?
- What will be the noise level in front of these retirement homes adjacent to Phyllis Place?
- Will this noise be significant?
- Will mitigation measures be required to meet the City's interior 45 dB CNEL noise level?
- If so, describe the mitigation measures and the responsible party for any mitigation that's needed.

The potential construction and operation-related noise impacts of the proposed project are detailed in Section 5.4, *Noise*, of the DEIR. The closest City View Retirement Apartment building is approximately 300 feet west of the proposed roadway connection. These apartments are represented by receptor R5 in Section 5.4. As noted in Section 5.4, the future noise levels with the project will be up to 60 dB CNEL (DEIR Table 5.4-8), the impact will be less than significant, and no mitigation measures are required. No changes to the FEIR are warranted as a result of this comment.

BQ-15: The commenter asks what the noise cumulative impact from the Phyllis Place and Franklin Ridge Road traffic on the 56 multifamily retirement homes located at the City View Church site would be.

Please see the response to comment BQ-14. These apartments are represented by receptor R5 in the DEIR. As noted in the DEIR the future noise levels with the project will be up to 60 dB CNEL (DEIR Table 5.4-8), which is below the established threshold of 65 dB CNEL, and the impact will be less than significant. Subsequently, no changes to the FEIR are warranted as a result of this comment.

BQ-16: The commenter notes that the connection will bisect the proposed park. The commenter quotes a portion of the City of San Diego's CEQA Significance Thresholds related to noise impacts and states that both portions of the park are within 50 feet of the roadway connection and the ADT will be greater than 7,500. The commenter has the following questions.

- What will be the noise level at this park?
- Will this park be exposed to outdoor noise that exceeds what is allowed for in the Municipal Code 59.5.0402, and defined in the Significance Determination Thresholds (p. 51) as 65 dB CNEL?
- Discuss the mitigations that would be needed to reduce the traffic noise to less than significant levels.

In response to this comment, the FEIR has been updated to add a receptor location to represent Phyllis Place Park. Based on plans for the park, the receptor was placed at the area closest to the roadway connection that would be used for extended periods. This area consists of playgrounds and picnic tables located within approximately 50 feet of the centerline of Phyllis Place, west of the proposed roadway connection. The predicted future-with-project noise level at this location is approximately 61 dB CNEL. This is below the guideline of 65 dB CNEL and, as a result, there are no new significant impacts. Municipal Code section 59.5.0402 refers to noise from motor vehicles operating off-road and specifically does not apply to vehicles operating on a public street; therefore this standard is not applicable to the project.

BQ-17: This comment excerpts portions of the CEQA Guidelines related to cumulative impacts, including Sections 15355, 15358(a)(2), and 15126.

Chapter 6, *Cumulative Impacts*, of the DEIR, analyzes cumulative impacts of the proposed project in accordance with all relevant sections of the CEQA Guidelines. The comment does not specifically raise an issue with the environmental analysis contained within the DEIR.

BQ-18: This comment asks if there are any Mission Valley present or future projects outside of Civita where the residents or employees would be likely to use Qualcomm Way and Franklin Ridge Road or Civita Boulevard and Via Alta to access the proposed roadway connection. It also asks if this would create a cumulative impact on the environment (e.g., traffic, air quality, and noise).

As detailed in Section 6.2, List of Cumulative Projects, of the DEIR, based on information provided by the City, 12 cumulative projects were considered in the analysis (as shown within DEIR Figure 6-1 and Table 6-1). Several of these projects are located in Mission Valley, including the following nine projects listed below (numbering corresponds to the DEIR):

2. Mission Valley Fire Station
4. Mission Road Townhomes
7. Union Tribune Master Plan
8. Town and Country
9. Legacy International Center
10. Camino Del Rio Mixed Use
11. Hazard Center Redevelopment
12. Friars Road Multi-Family
13. Riverwalk Master Plan

All of these projects were taken into account when conducting the cumulative impact analysis, which is contained within Section 6.3 of the DEIR.

As detailed in Section 6.1 of the DEIR:

According to Section 15130(b) of the State CEQA Guidelines, cumulative impact analysis may be conducted using one of two methods: the List Method, which includes a list of past, present, and probable activities producing related or cumulative impacts, or the Plan Method, which uses a summary of projections contained in an adopted general plan or related planning document, or a prior environmental document that has been certified, that evaluated regional conditions contributing to the cumulative impact. The cumulative analysis that follows for the majority of issue areas uses the Plan Method but, in many cases, is supplemented by the List Method. The Plan Method is more accurate primarily because the project's Transportation Impact Analysis provides a scenario for the anticipated 2035 condition. This future condition is based on the forecast contained in the San Diego Association of Governments (SANDAG) Series 12 traffic model. As such, the cumulative analyses for long-term transportation impacts as well as long-term traffic-related impacts associated with air quality, greenhouse gas (GHG) emissions, and noise and vibration use the Plan Method.

As detailed within Section 6.3, Cumulative Impact Analysis, of the DEIR and summarized within Tables 6-2 through 6-5, the proposed project would result in significant and unavoidable cumulative

impacts related to transportation/ circulation. The proposed project's incremental contribution to cumulative impacts related to air quality and noise would not be cumulatively considerable, as detailed in Section 6.3.

BQ-19: This comment asks if there are any Mission Valley, Serra Mesa, Grantville, or Kearny Mesa proposed or future projects where a street connection would allow greater density or greater growth than without the roadway connection. If it is the case, the comment asks that the projects and their direct, indirect, and cumulative impacts be described. This comment relates to the proposed project's potential to result in growth inducement, which is detailed within Section 8.3, Growth-Inducing Impacts, of the DEIR. The DEIR adequately analyzes the potential for both direct and indirect growth inducement. Section 8.3.1 of the DEIR analyzes direct population growth and states that "no new residential units or other structures that would generate population would result from implementing the proposed project. Therefore, the proposed project would not directly result in population growth."

Concerning indirect growth-inducing effects related to substantially altering planned growth, as detailed in Section 8.3.2 of the DEIR: "...the proposed project would result in redistribution of area traffic patterns; however, no new traffic would be generated as a result of the project. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans. The proposed project would not be expected to alter the density or growth rate of the adjacent Quarry Falls development because this project has an approved specific plan that specifies the residential densities within the site. Therefore, the proposed project would not substantially alter the planned location, distribution, density, or growth rate of the population of an area."

Concerning the indirect growth-inducing effects related to the extension of infrastructure, as detailed in Section 8.3.2 of the DEIR: "...the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The proposed roadway would accommodate existing and planned near-term growth within the vicinity of the project site. Furthermore, it would provide additional options for motorists, pedestrians, and cyclists to travel north and south between the Serra Mesa and Mission Valley communities. Because the site is located within a community that is in the process of being nearly built out, all major public services and utilities currently service the project site. The proposed project would require storm drains or related stormwater management features; however, these would be sized to treat only the stormwater associated with the project itself. It would not provide surrounding development with stormwater treatment. Furthermore, no new infrastructure facilities for water supply or wastewater treatment would be required to accommodate the project. The proposed project would not result in the extension of major infrastructure facilities into areas that would induce population growth or reduce barriers to additional growth."

Therefore, the proposed project is not anticipated to result in allowing another probable or future project to have greater density or greater growth than if the proposed project were not to be implemented. The proposed project would generally serve to accommodate the traffic within the vicinity of the project site as the communities continue to be built out in accordance with the applicable community plans, and not to encourage additional development.

As previously detailed in the response to comment BQ-18, reasonably foreseeable projects were analyzed within the context of the potential for cumulative impacts. These projects are not within the immediate vicinity of the project site, except for Quarry Falls. However, the Quarry Falls project is a previously approved project with a limit to the number of residential and commercial space it would be able to develop. As such, the growth inducement analysis provided in the DEIR indicated that the project would not open up new areas to development or otherwise cause growth inducement. No revisions to the FEIR are warranted as a result of this comment.

BQ-20: This comment asks if there are any other direct or indirect impacts of the proposed project and to describe them. As detailed in the Executive Summary and the notices at the beginning of the DEIR:

Based on the analysis presented in Chapter 5, the project would result in significant and unavoidable direct impacts after mitigation related to the topic areas of transportation/circulation (roadway network capacity, planned transportation systems, and traffic hazards). Based on the analysis provided in Chapter 5, the proposed project would result in significant and unavoidable cumulative impacts related to transportation/circulation.

With the implementation of mitigation measures, the proposed project would result in less-than-significant impacts for the issue areas of noise (construction noise), biological resources (sensitive species and sensitive vegetation communities), historical resources (historical resources, religious/sacred uses, and tribal cultural resources), and visual effects/neighborhood character (landform alteration).

The DEIR adequately discloses all significant direct and indirect impacts of the proposed project. No revisions to the FEIR are warranted as a result of this comment.

BQ-21: This comment excerpts a portion of text from the Cal Recycle website that references how that agency interprets how mitigation should be developed.

It should be noted that the quoted excerpt is no longer available at the website address provided within the comment, nor is this language from the CEQA Statute or the CEQA Guidelines. The DEIR identified mitigation measures to reduce significant impacts of the proposed project in accordance of Section 15126.4 of the CEQA Guidelines. This comment does not specifically address the adequacy of the environmental analysis or mitigation measures set forth within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

BQ-22: This comment states that mitigation measures are not adequately described. The comment also lists an example, stating the description of a traffic mitigation measure does not indicated where the space will be acquired to widen the road.

The measure referenced provided an improvement that would accommodate additional traffic because there is sufficient right of way for the measure. However, the exact design for roadway striping does not need to be completed at this time, which typically occurs when the project is being designed for implementation (in this case, it would be prior to the impact occurring which could be many years from now). Please note that the Mitigation Monitoring and Reporting Program (MMRP) includes all required components of mitigation under CEQA. No changes to the FEIR are required in response to this comment.

BQ-23: This comment states that the secondary impacts of mitigation measures are not adequately described. The comment also asks if the widening of Phyllis Place from the proposed project to the I-805 SB Ramp would remove parking spaces in front of the Phyllis Place Park.

Under the existing condition, no on-street parking exists at the location mentioned in the comment. Clarifying language has been included within the FEIR to discuss the potential secondary impacts of the mitigation measures that will be implemented. No new significant impacts were identified. Please see the clarifications added to Section 5.2, *Transportation and Circulation*, as part of the FEIR.

BQ-24: This comment states that a mitigation measure does not improve the existing condition. Specifically, the commenter states that restriping Murray Ridge from Mission Center Road to Sandrock Road to 4 lanes, while improving future traffic congestion, would remove existing bikes lanes. If implemented, the commenter is of the opinion that it would create impacts on residents.

As noted in Section 5.2, *Transportation and Circulation*, of the DEIR, this measure is unlikely to be implemented because it could result in secondary effects, such as the removal of bike lanes that would be counter to adopted plans, which include the Bicycle Master Plan and the Climate Action Plan. Please see the clarifications added to Section 5.2 as part of the FEIR.

BQ-25: This comment states that the mitigation measures do not include how the measures will be implemented, who is responsible, and when they would occur.

Please see the mitigation monitoring and reporting program (MMRP), which is included as part of the FEIR. The MMRP details the method to accomplish the mitigation measure, the responsible party for implementation, the party responsible for oversight, the timing of the measure, and the impact's level of significance after the measures implementation.

BQ-26: The commenter quotes an excerpt from the CEQA Guidelines (15370), which defines what mitigation is under CEQA. The commenter makes a general statement that some of the mitigation measures may make the existing condition worse for residents, particularly along Murray Ridge Road and the Abbotshill area.

There is no requirement under CEQA that a mitigation measure shall have no adverse impact on the environment. In many cases, mitigation may avoid, minimize, rectify, reduce, or compensation for one impact, but result in a secondary impact. The lead agency has the discretion to adopt the mitigation measure in light of the secondary effect or to reject the mitigation measure and provide a statement of overriding considerations as to why the overall benefit of the proposed project outweighs the identified significant environmental impacts. As noted in the responses to comments BQ-23 and B-24, some of the mitigation measures included in the DEIR would result in additional secondary impacts. In these cases, the DEIR indicates that it is unlikely the mitigation measure would be implemented because of the secondary effects, such as the removal of an existing bike lane. In these cases, the City may declare in the Statement of Overriding Considerations that the project's benefits outweigh its environmental impacts (See CEQA Guidelines 15093). No changes to the FEIR are required in response to this comment.

BQ-27: This comment states that the objectives that were described by the City Council are not the ones that were studied and that a different set of objectives were selected. It states that the recirculated DEIR redefined the objectives that were described in the Draft PEIR. The comment states that by redefining the objectives, the DEIR has precluded the "No Build/Remove from Mission Valley Community Plan Alternative" from meeting a strict interpretation of the objectives and that the alternative was considered but rejected and was not studied. This comment also states that this

alternative could have a lesser impact on the environment and refers to the Serra Mesa Planning Group's letter for a detailed discussion.

Please see the responses to comments G-14, G-15, and G-16 for comments related to project objectives and their relationship to City Council Resolution #304297.

Concerning the No Build/Remove from Mission Valley Community Plan Alternative, the City, as lead agency, formulated the project objectives that contain the underlying purpose of the proposed project, which helped to develop a reasonable range of alternatives to evaluate in the EIR. As lead agency, it is the City's discretion to formulate objectives of the proposed project. As detailed within Section 9.4.1.2 of the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not include the construction and operation of the roadway connecting Phyllis Place to Franklin Ridge Road/Via Alta, and would remove language regarding the potential connection from the Mission Valley Community Plan. This alternative was rejected from further consideration because it would not meet *any* of the project objectives, as detailed within Section 9.4.1.2.

Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City's Climate Action Plan and Bicycle Master Plan include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended.

The comment does not specifically detail why the suggested alternative would reduce environmental impacts associated with the proposed project and refers to the detailed discussion contained within the Serra Mesa Planning Group's letter. Please refer to responses to comments within that letter, included as Letter G to this FEIR. No revisions to the FEIR are warranted as a result of this comment.

BQ-28: This comment states that objectives changed between the previously circulated PEIR and the DEIR. It also states that if the phrase "as it pertains to the connection" had been retained in the objective and the line from the Mission Valley Community Plan "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas" were considered, if the "No Build/Remove from Mission Valley Community Plan Alternative" would meet this objective.

Please see the response to comment BQ-27. As lead agency and project proponent, the City has the discretion to formulate the objectives of the proposed project. Furthermore, the Mission Valley Community Plan specifically recommends a roadway connection, as detailed within Section 3.2.1 of the DEIR: "Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states: Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805." As previously detailed, the No Build/Remove from Mission Valley Community Plan Alternative was rejected from further consideration because it would not meet any of the project objectives, as detailed within Section 9.4.1.2. No revisions to the FEIR are warranted as a result of this comment.

BQ-29: This comment states that objectives changed between the previously circulated PEIR and the DEIR. It states that the analysis made by the Serra Mesa Planning Group confirms that local mobility will worsen in Serra Mesa with the roadway connection. This comment also asks that, given

this analysis, if the “No Build/Remove from Mission Valley Community Plan Alternative” were compared to “with roadway project,” if the “No Build/Remove from Mission Valley Community Plan Alternative” would meet this objective.

Please see the responses to comments BQ-27 and BQ-28. In addition, as detailed within Section 9.4.1.2, the No Build/Remove from Mission Valley Community Plan Alternative would not improve local mobility in the Serra Mesa and Mission Valley planning areas, as no roadway would be constructed, thereby limiting routes between these planning areas. No revisions to the FEIR are warranted as a result of this comment.

BQ-30: This comment states that if the purpose of the roadway connection is to benefit Mission Valley circulation and relieve congestion, the objective to “improve local mobility” is inaccurate.

There is no objective within the Project Description (see Chapter 3) of the DEIR that states the project is intended to benefit circulation within Mission Valley only. The objectives of the proposed project are detailed within Section 3.1 and comply with CEQA. No revisions to the FEIR are warranted as a result of this comment.

BQ-31: This comment restates an objective that was not included within the DEIR but was included in the previously circulated PEIR. It states that a trail for bicyclists and pedestrians is mandated with or without the roadway connection and that the existing emergency access at Kaplan and Aperture Circle provides bicycle and pedestrian access. The comment states that by removing this objective, the “No Build/Remove from Mission Valley Community Plan Alternative” alternative could not meet this objective. This comment also asks that, given that a trail for bicyclists and pedestrians from Civita to Phyllis Place Park is mandated, if the “No Build/Remove from Mission Valley Community Plan Alternative” would meet this objective if it had been retained.

Please see the responses to comments BQ-27 and BQ-28. As lead agency and project proponent, the City has the discretion to formulate the objectives of the proposed project. Clarifying information regarding the trail connection and emergency access at Kaplan Drive was added to the FEIR, although it does not alter the conclusions of the environmental analysis.

BQ-32: This comment alleges that by changing the objectives from the mandated ones in the City Council resolution and by not including pertinent information, the City seems to have created a prejudicial situation that preempted the No Build/Remove from the Mission Valley Community Plan Alternative from receiving a warranted and complete environmental review.

The City does not agree with the opinion expressed in this comment. The City Council did not prepare objectives for the proposed project. As part of the Council Resolution that initiated the project (see Chapter 3, *Project Description*, of the DEIR), City Council directed staff to consider four issues (please see response to Comment G-14 as it pertains to the issues raised by City Council). Please see the responses to comments BQ-27 through BQ-31 as it pertains to development of the objectives, which were designed to address the issues raised by City Council. No changes to the FEIR are required in response to this comment.

BQ-33: This comment states that the Planning Department made a presentation to the Mission Valley Planning Group on May 3, 2017 and to the Serra Mesa Planning Group on May 18, 2017 and in slide 3 under Reasons for Recirculation is this statement, “Reasonably foreseeable that construction of the roadway will occur.”

The City has acknowledged that the reason for recirculation is that the construction of the roadway is reasonably foreseeable to occur, which was raised in comments received on the Program DEIR previously prepared. As detailed within the Public Notice of Availability for Recirculation of an EIR and also within Chapter 3, *Project Description*: “After considering the comments received during the public review period, the City decided to analyze the road connection with a project-level analysis. The additional description and analysis warranted revisions to the draft PEIR, which in turn led the City to decide to replace the PEIR with a project-level EIR and recirculate for a second public review.” The City does not agree that this represents a “prejudicial” position. The requirement under CEQA is to analyze the physical impacts on the environment of a *proposed project (emphasis added)*. The proposed project was adequately described in accordance with CEQA, and will be subject to the approval of the City Council. Although the comment insinuates that the City has been prejudicial in crafting the proposed project, it does not raise a specific issue with the substantive environmental analysis within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

BQ-34: This comment a brief history of the commenter’s involvement with the road connection and provides a summary of the City Council Resolution. The comment makes reference to the Serra Mesa Planning Group’s letter (Letter G) and indicates that the resolution “indicated that this initiation of a community plan amendment in no way confers adoption of a plan amendment.” Finally, the comment states that the City does a disservice to the community when it does not follow the mandates of the City Council, resulting in an erosion of trust between the City and the community.

Regarding the Serra Mesa Planning Group’s letter, please see the responses to all comments contained within Letter G of this FEIR. Moreover, the commenter’s reference to a quote from the resolution is correct; the resolution was not binding as a plan amendment. The plan amendment is part of the action of the proposed project and the City Council has not yet voted on whether to adopt the amendment. Finally, the City does not share the commenter’s opinion that the issues raised in the resolution were not objectively analyzed within the DEIR. The comment does not specifically elaborate as to why the DEIR was not objectively analyzed. No revisions to the FEIR are warranted as a result of this comment.

BQ-35: This comment states that the impacts of the roadway connection (if approved) within Civita are reminiscent of the traffic impacts on the residents of Murray Ridge Road between Mission Center Drive and the I-805 ramps. It states that these Murray Ridge residents contend daily with noise, air pollution, and the challenges of exiting their driveways. Finally, this comment states that the situation they encounter should not be repeated in another community.

The DEIR adequately details the potential impacts of the proposed project related to noise, air pollution, and traffic hazards. As detailed in Section 5.4, *Noise*, with the implementation of mitigation measures, the proposed project would result in less-than-significant impacts for the issue of construction noise. All other issues within that section were determined to be less than significant. Section 5.3, *Air Quality*, determined that potential impacts would be less than significant. Finally, Section 5.2.6 within Transportation/Circulation analyzed potential traffic hazards. As detailed therein, it was determined that the proposed project would require a signalized intersection along Phyllis Place, which would in turn result in possibly unsafe conditions for motorists entering or exiting the City View Church parking lot, as the driveway would be approximately 150 feet east of the signalized intersection. Impacts were determined to be significant and unavoidable as the City’s ability to implement this measure is limited. It should also be noted that no other residential or any other driveways would be affected by the proposed roadway. No revisions to the FEIR are warranted as a result of this comment.

BQ-36: This comment states the commenter looks forward to reading the comment letters and responses, and has provided a name and email address for notification of any updates, notices, or documents on this item. The commenter's name and email address was previously added to receive any updates or notices related to this project, and the City will continue to inform the commenter of any updates or notices.

From: [Joleen Garnett](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No 265605 SCH No 2012011048
Date: Wednesday, May 24, 2017 2:46:52 PM

Dear Whom It May Concern,

BR-1

My name is Joleen Garnett and I am a current resident of Origen in the Civita Development. I'm writing this email to inform the Board of Directors and Planning Department, that I strongly oppose the proposed roadway connector within Civita. I have lived at Origen for over three years now and have come to treasure and love this wonderful neighborhood. It is not only a friendly and fun place to live but it is also a safe area. During my time here, I have noticed that many residences walk and ride their bikes throughout the neighborhood. In addition, many individuals enjoy the amenities of the park and even Origen holds functions throughout the year in the park. With the connector, I believe that all the traffic will compromise the integrity of the neighborhood and will diminish the activities of its residences. The connector will flat out increase the traffic on Via Alta and will ultimately violate the safety of the residences of Civita. Along with the potential safety threat, it will also congest the streets and cause traffic problems. As you already know, there is a proposed elementary school along Via Alta. If the school gets slotted in the area, the connector will further intensify the traffic and safety of Civita's residents and future school children. In addition, I feel that this neighborhood and San Diego in general does not need a connector to the freeway because there are already alternate routes that are easy accessible to many of the freeways. Mission Center Road to the 805 is a great example of an alternative route. Lastly, the connector will ruin the character of Civita. It's a neighborhood where residences live and enjoy the sunny weather. With the connector, it will be full of cars, noise and increase smog. Please don't vote to destroy one of the few neighborhoods that is located in Mission Valley. I hope you take my email into consideration and deny the measure to build the connector. If you would like to discuss this further in person, I would be more than glad to do so.

Thank you for your time and understanding.

Respectfully,

Joleen Garnett

Letter BR: Joleen Garnett

BR-1: The commenter expresses opposition to the proposed roadway connection due to concerns about increased traffic, pedestrian safety, noise, and smog. The comment also indicates the existing alternative routes are sufficient and the proposed project is not necessary.

Please see the responses to comments F-2, F-4, and F-5. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

Letter BS

From: [dong.han](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Wednesday, May 24, 2017 2:38:12 PM

Dear Sir/Madam,

I have several questions after I read the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

1. Did the Draft ER address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
2. The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-used community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips. Instead of a cohesive community, this road connector will virtually slash Civita into 3 separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community. Why weren't these objectives, as directed by the City Council, used in the studies and analyses? Will the above information be added to the appropriate sections of the Recirculated DEIR? if not, provide an explanation for the exclusion.
3. The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. however, the quarry is now developing into a vibrant, planned residential community with lovely parks, walking trails, a community center, a school, community events and concerts....., in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the connector road would do. It would gut this community for the sake of what? why hasn't the DEIR proposed better solution?

Based on all the concerns listed above, I am strongly against this proposed freeway connector plan.

Thank you for your time and consideration and I look forward to hearing from you soon,

Dong Han
7876 Inception Way
San Diego, CA 92108

BS-1

Letter BS: Dong Han

BS-1: This comment asks if the DEIR addressed the potential increase in traffic and pedestrian safety for the future school site planned for the corner of Civita Boulevard and Via Alta.

Please see the responses to comments F-2, F-4, and F-5.

BS-2: This comment states Civita was intended to be a walkable, family-oriented, smart-growth community, and the proposed project would divide the community and it would no longer be walkable. The comment questions whether these objectives for the Civita community were considered as part of the DEIR.

Please see the responses to comments F-2, F-4, and F-5.

BS-3: The comment states the roadway connection made sense when it was proposed 30 years ago, but now that there is a vibrant neighborhood, it does not make sense. The comment also asks why the DEIR does not propose a better solution.

Please see the response to comment F-2. In addition, the project alternatives are listed and analyzed in Chapter 9, Alternatives, of the DEIR.

Letter BT

From: [Cicely Kraus](#)
To: [PLN_PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Wednesday, May 24, 2017 5:54:28 PM

BT-1

I am writing to object to the proposed Road Connector for 805 into the Civita community. As a mother of a young child who will grow up in the Civita community, one of the main reasons my husband and I bought in this area was to have a safe and walkable community for our child. The significant increase in projected traffic is now a huge concern for me as we walk around our neighborhood streets with our small child and dog.

My questions are below:

BT-2

1. How does the city propose to protect pedestrians from the influx of cars coming through our neighborhood on Via Alta?
2. How will speeds of cars be enforced to our neighborhood 25 mile per hour speed limit?
3. Will there be an increase in police presence to protect our roads from speeders?
4. How will Via Alta be improved to protect pedestrians who are crossing from our neighborhoods to the park and avoiding the additional cars going to the 805 ramp?
5. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
6. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
7. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all of which closely abut against the street with very little or no setback?
8. Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?
9. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?
10. Will there be an increase in police patrols to protect pedestrians and children during rush hour times when commuters are speeding to get to work while children are walking to the park and dodging those speeding cars?

BT-3

We ask you to **not recommend** Serra Mesa Community Plan be amended to include a street connection. The PEIR does not meet the objectives to improve traffic and in fact it shows negative impacts on the environment, safety, noise and pollution levels in the area. We need other alternatives considered.

We ask that you deny the CPA as it will not benefit the residents of Civita or Serra Mesa.

Our community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time. **Please do not ruin our neighborhood.**

Thank you for your help in this matter.
Cicely Kraus
Origen Homeowner in the Civita Community

Letter BT: Cicely Kraus

BT-1: The commenter expresses opposition to the proposed project due to an increase in projected traffic.

Please see the response to comment F-2.

BT-2: The commenter listed several concerns about traffic congestion, enforcement of the speed limit, police presence to protect the community from speeders, and pedestrian safety at the proposed school site on Via Alta.

Please see the responses to comments F-2, F-4, and F-5.

BT-3: This is a conclusory statement expressing the commenter's opposition to the proposed project and opinion that the EIR does not meet the objectives and results in negative impacts. Please see response to comment F-2. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: Thomas Leech <tomaseb@aol.com>
Sent: Saturday, May 27, 2017 4:10 PM
To: PLN_PlanningCEQA
Cc: c.a.moore@sbcglobal.net
Subject: Serra Mesa Road Community Plan Amendment Roadway Connection Project No. 265605

Attn: Susan Morrison, Env. Planner, City Planning Dept.

From Serra Mesa Resident Tom Leech, 8387 Abbots Hill Rd., San Diego CA 92123

Contents: Issues with the City Planning Dept's Revised EIR for the possible Franklin Ridge Road connection with Phyllis Place.

BU-1

Summary: If this Franklin Ridge Road connection is approved and done, it will create huge traffic and congestion delays for residents of Serra Mesa, especially those of us on the Phyllis Place (west) side from I-805, and also for Civita residents (many of whom are outspoken against the road connection). As shown in the Planning Department's recently-revised EIR, times to get onto 805 north and south from Serra Mesa at peak times are predicted to be 43 and **31 minutes (vs. much shorter current times with no road connection). This especially presents problems for Phyllis Place side residents who must either get onto 805 or over to the east side of Serra Mesa, to meet their personal and professional needs.**

Specific comments & concerns about the latest EIR:

BU-2

- **EIR Appendix C Table 3.2** shows current times to get on to 805 from Murray Ridge Rd are (northbound) p.m. 11 seconds and (southbound) 22 seconds. These are not realistic numbers as the access times are much longer at peak times.

BU-3

- **Per EIR, the average Daily Traffic (ADT)** from Phyllis Place to 805 south now is 2420 vehicles; ADT with the road connection will be 23,500 (EIR Appendix C, Table 3.1, page 22). This predicts a traffic delay of 31 minutes for vehicles to get onto 805 southbound from Murray Ridge Road or Phyllis Place (Appendix C, p61). **To get onto the 805 northbound ramp at peak times, the delay will be 43 minutes.** The EIR says that peak time is p.m. -- that is not accurate as 805 peak traffic northbound is in the morning, not afternoon. Will this be reviewed and obviously corrected?.

BU-4

- **These traffic delays will severely impact Phyllis Place side residents who must often leave their homes at close to peak times, e.g.,** (a) to get to their places of employment; (b) as entrepreneurs who must drive to their clients to provide services such as plumbing, painting, gardening, etc.; (c) to take their children to various schools; (d) to travel to the airport or Amtrak; (e) for personal medical treatments; and, critically important, for emergency medical assistance. These long traffic delays mean serious deterioration of community lifestyle and are not adequately addressed. Will you do so?

BU-5

- **Per the EIR, Phyllis Place will increase from 2 lanes to 5 lanes from Abbotshill Road to I-805.** Where will they get space for 5 lanes? Would this eliminate parking or bike lanes along Phyllis Place? Would this instead take church land (not likely)? Would this take land from the approved neighborhood park?

BU-6

- **This road connection also creates a major traffic and safety hazard for the many cars entering and leaving City View church,** especially those leaving via the exit east of the road connection as they will not be allowed to turn left toward 805, so instead will turn right/west and make a U-turn at the Abbots Hill Rd. connection, adding to the traffic mess. FYI City View church hosts many large groups on other than Sunday mornings. Would the church need to build a new exit that meets the Franklin Ridge Road connection? Has this issue been adequately addressed?

- **The approved and much-needed new 1.3 acres neighborhood park along Phyllis Place will be severely and negatively impacted should the road connection be approved** (as shown in EIR Figures 3-5A and B). Given that Phyllis Place would be widened to 5 lanes, it would likely require some land removed from the neighborhood park. It's not

BU-6
(cont'd)

↑ clear how much of the park land would be removed and where would the park then get enough land to meet the 1.3 acre requirement. Also with the required 5 lanes, and more parking space removed with the road connection, visitors who drive to the neighborhood park will have much-reduced ability to park their own vehicles along Phyllis Place. I don't see that the EIR has mentioned this negative effect, both for ability to use the park and on life quality of residents on the Phyllis Place side from 805.

BU-7

- **An issue of financial importance and not found on the EIR.** I and many fellow Serra Mesa residents are convinced that if the Franklin Ridge Road connection does occur, it will have a major financial impact on us. Specifically we believe that if the road does go through, our property values will decline significantly, with several predicting our home values (and selling prices) to drop a minimum of \$100,000 per house. Should not the EIR have addressed this VIP issue? If so where is it in the EIR?

BU-8

Thank you for addressing these issues and the many more you will receive from our Serra Mesa neighbors.

Tom Leech, Member Serra Mesa Community Council Board Member
tomaseb@aol.com, 858-650-081

Letter BU: Tom Leech

BU-1: The commenter expresses concerns for traffic delays for Serra Mesa residents accessing I-805 and cites I-805 northbound and southbound predicted access times of 43 and 31 minutes, respectively.

Under the 2035 scenario, growth would increase throughout the City and within the vicinity of the proposed project. As a result, traffic volumes would be much higher in general. See Table 5.2-18 within Section 5.2, *Transportation and Circulation*, of the DEIR, which compares the study area ramp meter performance under Long-Term Year 2035 baseline cumulative conditions and adds the project's contribution. As shown in the Table 5.2-18, all metered on-ramps within the project study area are projected to operate with fewer than 15 minutes of delay with the exception of the I-805 southbound on-ramp at Murray Ridge Road during the PM peak hour, which would operate with 31 minutes of delay. The required mitigation for an additional regular traffic ramp lane on the I-805 southbound on-ramp from Murray Ridge Road would improve delay at the ramp meter to an acceptable level. The I-805 northbound access time from Murray Ridge Road in the AM peak hour is predicted to be 9 minutes in the DEIR. The I-805 northbound access time from Murray Ridge Road in the PM peak hour is not included in Table 5.2-18 of the EIR.

The KOA Corporation Traffic Impact Study [(KOA TIS (January 2015))], included as Appendix A to the Serra Mesa Community Plan Amendment Street Connection Technical Report by Chen Ryan Associates [Chen Ryan Associates Technical Report (January 2017)], conducted ramp metering analysis for both the I-805 northbound and southbound on-ramps during both the AM and PM peak hours, and this analysis, reflected in Table 7-4, shows that there would be a delay of 43 minutes during the PM peak hours at the I-805 northbound on-ramp. However, this ramp meter is currently not activated during the PM peak hour. Therefore, this ramp metering analysis was not included in the Chen Ryan Associates Technical Report, reflecting existing conditions.

The northbound ramp meter is not likely to operate for the PM scenario in the future. Thus, the Chen Ryan Associates Technical Report only evaluated the ramp meters during the time period when the ramp meter is on under existing conditions. No revisions to the FEIR are warranted as a result of this comment.

BU-2: The commenter disputes the validity of the current northbound and southbound times of 11 seconds and 22 seconds, respectively, for accessing I-805 from Murray Ridge Road during the PM peak hour as shown in Table 3.2 of EIR Appendix C [Chen Ryan Associates Technical Report (January 2017)].

This data was determined in the intersection analysis used in the KOA TIS (January 2015), included as Appendix A to the Chen Ryan Associates Technical Report, and reflected in Table 4-2 of the KOA TIS. The intersection capacity analysis was conducted using the Synchro analysis software program that uses methodologies defined in the 2010 Highway Capacity Manual (HCM) to calculate the average expected delay per vehicle at an intersection measured in seconds. No additional traffic counts were taken for the recirculated DEIR TIS.

BU-3: The commenter cites current and projected ADT numbers from Phyllis Place and reiterates predicted times to access 805 northbound and southbound discussed above in BU-1. The commenter claims the EIR states that peak time is p.m. and is inaccurate, asking if this will be

reviewed and corrected. The commenter states that the impact of traffic delays to Phyllis Place residents will be severe.

The commenter appears to be referencing the Franklin Ridge Road to I-805 SB Ramp roadway segment along Phyllis Place in Table 3.1 in EIR Appendix C (Chen Ryan Associates Technical Study), which mirrors Table 5.2-10 in Section 5.2, *Transportation and Circulation*, of the DEIR, showing ADT of 2,420 vehicles in 2017 without the Project, and ADT of 23,355 in 2017 with the Project. Please see comment response to BU-1 regarding I-805 northbound and southbound predicted access times of 43 and 31 minutes, respectively.

The commenter's claims that the EIR states that peak time is p.m. and that I-805 peak traffic northbound is in the morning, not afternoon has been reviewed. As reflected throughout Section 5.2, *Transportation and Circulation*, of the DEIR, peak time or the time of the day when traffic is at its heaviest, is analyzed both during the morning (AM) and afternoon (PM) hours to capture both times of day during which most people commute. However, Table 5.2-18 and the Impact Discussion in Section 5.2.5.1 of the DEIR, and Table 7-4 in the KOA TIS support that delay is greater in the AM peak hour traveling northbound on I-805 from Murray Ridge Road, and delay is greater in the PM peak hour traveling southbound on I-805 at Murray Ridge Road.

This comment also raises several examples of when Phyllis Place area residents would leave their homes at peak traffic times and states that traffic delays will be severe and are not adequately addressed. Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR where all the environmental concerns related to traffic are analyzed, and the impacts are disclosed. No revisions to the FEIR are warranted as a result of this comment.

BU-4: The commenter references the proposed Phyllis Place lane widening from 2 to 5 lanes from Abbotshill Road to I-805 in the DEIR, and asks how land for widening of Phyllis Place will be obtained, if the park or church will be affected, and if parking or bike lanes will be eliminated.

Please see the response to comment BQ-23.

BU-5: The commenter states that the proposed roadway connection would create a major traffic and safety hazard for the cars entering and leaving City View Church, asks if a new exit would need to be built, and if the issue has been adequately addressed.

The analysis of the proposed roadway and the potential relocation of the City View Church driveway is analyzed within Section 5.2, *Transportation and Circulation*, of the DEIR. As stated in the DEIR, the City View Church is a privately owned property. Further coordination with the Church to relocate the driveway is necessary as this may in turn require the removal of trees and the reconfiguration of other internal access considerations within the Church property. However, any proposal for a new access point to the Church property would be conceptually designed to be consistent with the City's Street Design Manual (2002) and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection or for those entering or exiting the Church property.

BU-6: The commenter states concerns that the new 1.33-acre neighborhood park along Phyllis Place will be severely affected with the widening of Phyllis Place to 5 lanes, including reduction in park land and available parking.

Please see the response to comment G-165.

BU-7: The commenter expresses financial concerns not found in the EIR, specifically related to a drop in property values as a result of the proposed roadway connection.

Per State CEQA Guidelines Section 15121(a), the purpose of a Draft PEIR is to inform decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The DEIR does not consider property values in the context of CEQA and the determination of environmental impact because direct social and economic effects, such as project effects on property values, are not considered significant impacts under CEQA.

BU-8: The commenter thanks the responder for addressing these issues and any others received from Serra Mesa neighbors.

This comment is acknowledged.

From: Juan B Ospina <jbospina64@gmail.com>
Sent: Sunday, May 28, 2017 8:58 PM
To: PLN_PlanningCEQA
Subject: Keep Civita Walkable

BV-1

Dear friends, after reviewing the ER for the proposed connector I will like to see how is it that the city is planning to maintain Civita a walkable community. The report showed how the traffic on Via Alta will be increased. I live in Lucent at the west side on Via Alta, could you please tell me how I will go across to the park safely ?

Could you please tell me why were the builders allow to sale a walking community concept when in fact this wold not be the truth if you ever allow the connector?

Thanks,

Juan B. Ospina
8309 Distinctive Drive
Owner

Juan Bernardo
Sent from my iPad

Letter BV: Juan B. Ospina

BV-1: The commenter expresses concerns in maintaining walkability within Civita and safe access to the new Civita community park east of Via Alta.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general issues related to pedestrian safety and walkability, but does not specifically raise issue regarding the adequacy of the DEIR.

From: Jonathan <jsperry77@gmail.com>
Sent: Sunday, May 28, 2017 11:52 AM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048

BW-1

Hi my name is Jonathan Perry. I along with my fiancé Magdalena are home owners in the community of Civita. We bought our home in the new community 2 years ago with the understanding that it would be a very unique and safe walk everywhere family friendly community. We are planning on growing our family in the very near future and are very concerned with the news of a possible freeway connector running through the center of our neighborhood and ruining the safe community we have and are still creating at Civita.

I am writing this email with the hopes that you will take into consideration what adding a freeway connector through our community will do to jeopardize the safety of kids riding their bikes and families playing with our pets outside. We should embrace the feeling of community and not ruin it with another freeway connector.

Thank you very much for your time. If you would like to discuss this topic any further please contact me at (858) 349-5337 or jsperry77@gmail.com.

Thank you again,
Jonathan and Magdalena Perry

Letter BW: Jonathan and Magdalena Perry

BW-1: The commenter expresses opposition to the proposed roadway connection and concerns regarding the roadway connection jeopardizing community safety and walkability.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general issues related to pedestrian safety and walkability, but does not specifically raise issue regarding the adequacy of the DEIR.

From: hej3rd@aol.com
Sent: Sunday, May 28, 2017 4:41 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048

Ladies & Gentlemen:

BX-1

Safety First! The Civita residential neighborhood is currently a growing and already densely populated but relatively safe drivable and walkable planned community for our families and pets. Adding a freeway connector guarantees increased vehicular traffic, congestion and risk, while decreasing our safety. Take a look at the steep grade of Via Alta street today and you can see why drivers are going to have a difficult time negotiating bends and blind spots while trying to obey the speed limit. Heck, there are two permanently installed radar speed signs that display vehicle speed as motorists approach serving as reminders when traveling in both directions on Via Alta. We can tell you that it is difficult to maintain the speed limit to avoid unsafe situations due to the street slope. Keep in mind that existing Civita homeowners and residents using this street are familiar with the inherent risks and have a vested interest to ensure that our neighborhood and property remain safe. Others using the connector road by traveling up and down the street as a "short-cut" may not be so considerate and careful of our residents and potential driving dangers. Can you imagine when the planned elementary school is built at the northeast corner of Civita Boulevard & Via Alta and the heavy continuous daily traffic volume is more than doubled if the Plan is approved? There will be children, school busses, cars, and pedestrians clogging the area and thus increasing the dangerous conditions of accidents or worse.

BX-2

You may not be aware but 95% of the home owners living in Civita reject the subject Community Plan. Please do not ruin the neighborhood and the residential street of Via Alta. The "Plan" was not advertised nor was it explained to us when my wife and I purchased our retirement condo. Had we had this knowledge beforehand the thought of spending our money for a home next to a busy 4-lane freeway connector would not have happened. Instead we were sold on the idea that this is a growing walkable community that is animal friendly with residential areas where we could exercise and walk up and down a safe street.

BX-3

Instead of a disruptive connector, why can't the existing Mission Center Road located in a non-populated area be modified and widened (if necessary) to make ingress and egress to Friars Road and Mission Valley even easier? It is already a fully functional road that serves the needs of both Serra Mesa and Civita residents without sacrificing safety, congestion, and disruption. We would also suggest constructing a pedestrian crossing bridge over Mission Center Road for safer and quicker access to/from the Ralphs shopping center. This would ensure less stop-and-go vehicular traffic in that area from pedestrians crossing a busy street. This would certainly increase safety.

Thank you for your consideration. We urge that those on the committee make a visit to Civita to see firsthand our concerns for safety before deciding on the Serra Mesa Community Plan.

Best regards,

Henry & Julie Johnson
8315 Distinctive Drive
San Diego, CA 92108

Letter BX: Henry & Julie Johnson

BX-1: The commenters express general concerns regarding an increase in traffic and speeding vehicles with regards to pedestrian safety and walkability. The commenters also express concerns regarding the effects of additional traffic on the potential future school in Civita as it relates to safety.

Please see the responses to comments F-2, F-4, and F-5.

BX-2: The commenters state that the “Plan” as addressed in the proposed project was not advertised or explained to them when they purchased their Civita property.

Please see the response to comment F-2.

BX-3: The commenters question why Mission Center Road was not modified for easier access to Friars Road and Mission Valley instead of the proposing the project’s roadway connection from Phyllis Place to Via Alta/Franklin Ridge Road. In addition, the commenters suggest the construction of a pedestrian crossing bridge over Mission Center Road to the Ralphs shopping center.

Alternative options to the proposed roadway connection for providing a connection between the Serra Mesa and Mission Valley communities were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. The suggested construction of a pedestrian crossing bridge over Mission Center Road would also not meet a majority of these project objectives. Finally, under the No Project Alternative, the Quarry Falls project would be required to mitigate for impacts to Mission Center Road. Please refer to the Quarry Falls PEIR. No revisions to the FEIR are required as a result of this comment.

From: Laura McKenzie <laura.r.mckenzie@gmail.com>
Sent: Sunday, May 28, 2017 6:24 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048

To Whom It May Concern,

BY-1

As the city of San Diego has chosen to put the needs of Serra Mesa over the needs of the Civita community by building a connector within a populated residential neighborhood, I have several questions for the city to answer. To be clear, I expect a formal response from the City as I am a Civita homeowner who is extremely concerned about this underhanded change of plans regarding the lay out of the community after the purchase my home.

BY-2

1. As a asthmatic resident who bought a home in this neighborhood so that my elderly mother who has dementia has a safe place to live without fear of being run down when she takes walks, I am 100% opposed to this project. **How does a connector benefit my community as well as the health and well being of my family when the City's EIR proposal (Environmental Impact Report) indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled?**

BY-3

2. Furthermore, the proposal projects 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district. **With a 30 mph speed limit, how will use of this connector alleviate traffic congestion? How will the city keep residents safe as they try to walk their dogs, take their children to school or to the park, go jogging or simply walk across the street to visit neighbors? When the school is built, how will congestion be alleviated as buses stop every few feet since residents will no longer be able to walk their children to school?**

BY-4

3. The San Diego Chargers are leaving the San Diego area. **Wasn't the re-introduction of this decades old proposal a desperate attempt to alleviate regional traffic congestion within Mission Valley during game days? Is it not true that the connector is a last ditch effort to keep the team within the city and appease complaining neighbors?**

BY-5

4. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality. **Will the city guarantee payment for the upkeep against environmental and physical degradation of Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units and 1.2M sf of retail and office if the connector is built?**

BY-6

5. With increased traffic comes increased CRIME as more people are introduced into our neighborhood. **Will the city guarantee and pay for increased security patrols 24/7 by San Diego Police to ensure that Civita residents are able to run and bike on those carefully designed walking paths or use the expensive PUBLIC park, residential community pool or fitness center that we the residents of Civita pay for without fear of being attacked, raped or murdered regardless of the time of day?**

BY-7

6. The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets of Civita into high volume freeway connectors. This community cannot successfully serve two

BY-7 (cont'd)	<p>↑ diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time. Is the city prepared to ensure residents have adequate parking throughout the community by giving each homeowner ten guest parking emblems at no cost so that Civita residents are able to have family members, friends and guests over for visits as well as ensure that baby/pet sitters, building contractors and repair/servicemen are able to park their vehicles in close vicinity to the homes they service? Will the city promise to convert all Civita streets into resident permit only parking so that the neighborhood doesn't experience further parking congestion by San Diegans who are commuting via bus, car pool or through overuse of the public park?</p>
BY-8	<p>7. Residents see themselves as Stewards of Civita. They are the ones that bought into the City's progressive plan of communities and parks for the future and they are the ones that will make sure it succeeds. Home owners in Civita were surveyed and 95% of them are against the freeway connector. When Civita owners bought their homes, the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa. Did the Mayor and city council intentionally mislead residents and developers about their plans for the connector in order to get wealthier taxpayers to pay for development of the land? Does the city acknowledge that such deceit is criminal as residents are locked into homes that will have a lower re-sale value and are responsible to continue paying for amenities such as a public park that they are unable to use?</p>
BY-9	<p>8. Via Alta is a thriving neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands. There is constant movement up and down the street. There are no pedestrian crossings along Via Alta other than at Civita Blvd and at the top of Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely; thus cutting off access for over 1,000 residents to Civita Park, the Rec Center and future elementary school. Why should Civita residents continue to pay nearly \$600K annually for a public park that they can't even use? If the connector is built, residents should no longer have to fund the public park's upkeep and should receive repayment for building of the park. How and when will residents be repaid, if the city goes ahead with building the connector?</p>
BY-10	<p>9. There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allowed and because of access for emergency vehicles, speed bumps are not allowed. When will the city lay out a plan that shows how it will keep residents safe from harm if this connector is built?</p>
BY-11	<p>10. Residential units line both sides of Via Alta from the base of the hill all the way up to the ridge. The front doors, porches, balconies, and bedrooms of homes are no more than 10 to 15 feet from the street. What is the city's plan to keep residential homes safe from property damage due to speeding cars, vandals, burglars and homeless encampments that have been established at locations such as the I5-S connector located at 16th and Market Street in downtown San Diego? How are lost pets or stray animals going to be protected in a city that claims to be pet friendly?</p>
BY-12	<p>11. GPS programs will indicate that cutting through Civita is the shortest route for cars traveling through Mission Valley to the 805. Drivers will not care they are going through a residential area. How is the city going to keep residents safe from the increase of crimes such as drunk driving, reckless driving and or road rage incidents by drivers with no ties to the Civita community?</p>
BY-13	<p>12. Other connector streets for Mission Valley are located in non-populated areas. Most are located at the base or top of ridges, and these connectors are surrounded by open canyon land on the non populated areas leading in and out of the Valley. Those existing connections within Mission Valley are Mission Village Road, Mission</p> <p>↓</p>

BY-13 (cont'd)	<p>Center Road, Texas Street, and Bachman Place. Why doesn't the city build another connector in a non-populated area of the need is so severe?</p>
BY-14	<p>13. The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. We have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods. Why would the city consciously and intentionally make a primary residential street a freeway connector and subject more residents to the same problems these other streets are experiencing? Moreover, the Mission Center Road connector is right next to Civita and is rarely used. Why do we need another connector that is less than a mile away from the first connector?</p>
BY-15	<p>14. Easy ingress/ egress to Civita in multiple directions will increase the crime rate. How will the city protect residential property values and the ability to sell Civita homes in the future by preventing an increase in property and violent crimes from occurring? As it stands, an increase in crime near areas with these locators have brought the value of homes within Mission Valley down. What is the city's plan to bring these crimes down?</p>
BY-16	<p>15. There are other improvements already approved for Mission Valley that will ease traffic congestion. The intersection of 163 and Friars Road is scheduled to be completely reconfigured to function better. With other options to improve traffic flow within Mission Valley, why is the city intent to destroy Civita, San Diego's first walkable community? What are city politicians getting from special interests groups in return for their support of this project?</p>
BY-17	<p>16. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa? Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?</p>
BY-18	<p>17. The connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. Why would the city build a connector that will gut a newly built community while dropping property values for the sake of cutting one or two minutes from someone's commute?</p>
BY-19	<p>18. The City will never be able to keep up and accommodate what could be an infinite number of cars due to a growing population. If San Diego wants to truly be a big city in every sense, than it must invest in a large scale mass transit system. I have lived in Chicago, Los Angeles and London - cities with in depth mass transit systems. Those cities have grown and prospered. I have also lived in cities like Miami and San Diego which are cities that don't invest in mass transit. Miami is scrambling to build mass transit alternatives because their population has become more transient and unwilling to put down roots in a city which has massive traffic problems, requires a car to travel everywhere, has widespread crime in all city neighborhoods and high housing prices. A transient population means less taxpayers who pay into the city and who will live somewhere else such as Eastlake to get away from the traffic and have walkable communities. So when does the City stop trying to accommodate an ever-increasing number of cars on the roads? Does the city ruin every</p>

- BY-19 (cont'd) ↑ residential street to accommodate this demand? Does the Mayor and city council realize this is a never-ending problem and needs a different solution?
- BY-20 | 19. When will the city put the time and energy into improving and adding more mass transit in and through Mission Valley? When will the city make it easier for residents to use alternative forms of transportation?
- BY-21 | 20. Whatever the City does, DO NOT ruin a neighborhood in the process. Visit London and see how the British have alleviated their horrendous traffic issues with a world class mass transit system. **Does the Mayor and city council understand angry Civita residents will VOTE in retaliation for betraying us if this occurs?**
- BY-22 | In closure, the city can have residents generate our protests in question form in an attempt to downplay our concerns. Residents like me will vote to get the Mayor and council supporters of the plan out of office. We will donate to the campaigns of politicians who share our values and champion our rights. We will speak to our military representatives and urge them to stop sending service members to live here and to counsel service members on the dangers of buying homes in San Diego because they may be locked into homes that will lose property value due to the city's deception. We will alert the national press about this situation and its impact on residents. Please think of the questions the Mayor and council will face from national reporters begin to report on this story and the impact on homeowners. The exposure will probably do the city more harm than good because the city's deceit and reasoning for the connector is indefensible. I recommend that you quit while you are ahead.

Respectfully,

Laura McKenzie

Letter BY: Laura McKenzie

BY-1: The commenter states that she has numerous questions for the City to answer and expects a formal response as a Civita homeowner who is concerned about the “underhanded change of plans regarding the lay out of the community” after purchasing her home.

This comment is acknowledged. Please see the responses to comments BY-2 through BY-22 below.

BY-2: The commenter asks how the proposed roadway connection will benefit the community as well as the health and well-being of her family when traffic volumes on Via Alta/Franklin Ridge Road will be more than doubled.

Please see the response to comment F-2. There is no requirement under CEQA to explain the “benefits” of a project within the DEIR. The Findings of Fact and Statement of Overriding Considerations (attached to the FEIR) will detail why the project’s significant and unavoidable impacts would be considered acceptable. The proposed project meets all five of the project’s objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts. This comment also raises concerns related to air pollution, but does not specifically raise issue regarding the adequacy of the DEIR.

BY-3: The commenter asks how the proposed roadway connection will alleviate traffic congestion with a 30 mph speed limit, how pedestrians will be kept safe walking and crossing the street, and how congestion will be alleviated with buses once the school is built.

Please see the responses to comments F-4 and F-5. The conceptual design speed for the proposed roadway connection is 55 miles per hour. The posted speed cannot be determined before the facility is in operation and is based on the roadway classification. After the project is completed, the City will resurvey the roadway traffic and set the posted speed limit according to the results of that survey. The posted speed would not exceed the design speed, and safety would be a primary consideration for the limit set.

BY-4: The commenter asks if the proposed project is an attempt to alleviate regional traffic congestion within Mission Valley during game days and if the connection is a “last ditch effort to keep the team within the city and appease complaining neighbors.”

Please see the response to comment G-67.

BY-5: The commenter asks if the City will guarantee payment for the upkeep against environmental and physical degradation of Civita with the proposed roadway connection.

Maintenance activities required for the proposed 460-foot-long roadway connection are not expected to be significant as they would be infrequent, primarily related to the maintenance of landscaping within the median. Long-term maintenance of the parkway strips, embankments, and

median shall consist of routine weed abatement and removal of invasive species, which shall be the responsibility of the City of San Diego Streets Division.

The DEIR does not consider upkeep and maintenance of the community of Civita an issue that is under the domain of CEQA unless attributed to a specific physical impact on the environment. The commenter has not provided any substantial evidence as to how upkeep and maintenance would result in a specific physical impact on the environment. No changes to the FEIR are required as a result of this comment.

BY-6: The commenter questions what will be done to prevent crime that will follow as a result of the proposed roadway connector.

Please see the response to comment O-1.

BY-7: The commenter asks if more parking areas are planned throughout the community for Civita residents as a result of increased use of streets as a result of the proposed roadway connection.

Parking is not an environmental issue analyzed under CEQA unless it is attributed to a specific physical impact on the environment, which the commenter does not identify.

BY-8: The commenter states that Civita owners were given no indication regarding the proposed roadway connection and questions if the City intentionally misled residents in order to get residents to pay for development of the land and its amenities.

Please see the response to comment F-2.

BY-9: The commenter states that the proposed roadway connection will make it too dangerous for residents to cross the street safely, cutting off access to the park, recreation center, and future school, and asks if residents will be repaid for money they paid for the park.

Please see the responses to comments F-4 and F-5.

BY-10: The commenter expresses concerns with lack of traffic calming measures such as cross walks and speed bumps along Via Alta/Franklin Ridge Road.

Please see the responses to comments F-4 and F-5.

BY-11: The commenter states concerns for property damage from speeding cars, vandals, burglars, and homeless, and the protection of lost pets or stray animals.

Please see the response to comment O-1.

BY-12: The commenter questions how the city is going to keep residents safe from drunk driving, reckless driving, and road rage incidents as a result of the proposed roadway connection.

Please see the response to comment O-1. This comment raises general issues related to driving-related crime, but does not specifically raise issues regarding the adequacy of the DEIR.

BY-13: The commenter questions why the city doesn't build another connector in a non-populated area.

Please see Chapter 9, Alternatives, of the DEIR. It should also be noted that the proposed roadway connection is not a "freeway connector," but rather provides a multi-modal connection between the Serra Mesa and Mission Valley communities. Alternative options for providing freeway ramp access

were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. Alternatives to the proposed project are described and analyzed in Chapter 9. These alternatives included the Alternative Location Alternative, the No Build/Remove from Mission Valley Community Plan Alternative, the No Project Alternative, and the Bicycle, Pedestrian, and Emergency Access Only Alternative. As discussed in Chapter 9, the alternatives analyzed would not meet most, or all, of the project objectives described in Chapter 3.0, Project Description, of the DEIR. Furthermore, the commenter does not provide any specific additional alternatives. No changes to the FEIR are required.

BY-14: The commenter mentions high traffic streets in area communities and questions why the roadway connection is proposed through a residential neighborhood with Mission Center Road less than a mile away.

Alternative options to the proposed roadway connection for providing a connection between the Serra Mesa and Mission Valley communities were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. This comment does not specifically raise issue regarding the adequacy of the DEIR, so no changes to the FEIR are required as a result of this comment.

BY-15: The commenter questions how the City will protect property values with respect to an increase in crime as a result of the proposed roadway connector.

Please see the response to comment F-2. Per State CEQA Guidelines Section 15121(a), the purpose of a Draft PEIR is to inform decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The DEIR does not consider property values and crime in the context of CEQA and the determination of environmental impact because direct social and economic effects, such as project effects on property values and crime, are not considered significant impacts under CEQA.

BY-16: The commenter references the SR 163/Friars Road project for easing traffic congestion and questions why the City is “intent to destroy Civita” and what “City politicians are getting from special interest groups in return for their support of this project.”

Please see the response to comment F-2. The comment does not raise issue regarding the adequacy of the DEIR.

BY-17: The commenter questions why the roadway connection is proposed through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa, why this is not addressed in the Mission Valley Community Plan, and why the proposed project is being advanced prior to the Mission Valley Community Plan Update.

Currently, there is a discrepancy between the Mission Valley Community Plan and Serra Mesa Community Plan regarding a roadway connection south from Phyllis Place. The Mission Valley Community Plan calls for a roadway connection; the Serra Mesa Community Plan does not include the connection on the roadway map. Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states: “Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels.”

The proposed project’s first objective is to resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. The proposed project would meet this objective. As a result, the proposed project will remain in the updated Mission Valley Community Plan.

BY-18: The commenter questions why the city is building a connector that will “gut a newly built community while dropping property values.”

Please see the response to comment F-2.

BY-19: The comment provides an opinion about mass transit, traffic and transient populations, and growing populations in cities such as Miami. The commenter asks when the City will stop trying to accommodate ever-increasing traffic and find a different solution.

Please see the response to comment F-2. The proposed roadway connection would provide a multi-modal linkage between the Serra Mesa and Mission Valley communities, meaning the roadway would accommodate pedestrians, bicyclists, and vehicles. As detailed in Section 5.2, *Transportation and Circulation*, of the DEIR, the proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City’s Bicycle Master Plan. It should be noted that the proposed project would not generate new vehicle trips, but rather would result in the redistribution of area traffic patterns. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans. The comment does not raise issue regarding the adequacy of the DEIR. No changes to the FEIR are warranted as a result of this comment.

BY-20: The commenter asks about more mass transit in and through Mission Valley, and when the city will make it easier for resident to use alternative forms of transportation.

The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road, providing a multi-modal linkage between the Mission Valley and Serra Mesa communities. The addition of mass transit through Mission Valley is not a project component of the proposed project, and it is not analyzed in the DEIR. The comment does not raise issue regarding the adequacy of the DEIR.

BY-21: The commenter says to visit London and see how the British have alleviated their traffic issues with mass transit and questions if the City understands that angry Civita residents will vote in retaliation for the proposed project.

Please see the response to comment F-2.

BY-22: The commenter concludes by stating ways in which residents will protest the proposed project and recommends that “you quit while you are ahead.”

Please see the response to comment F-2.

From: Michael Sullivan <mwjsullivan@gmail.com>
Sent: Sunday, May 28, 2017 1:42 PM
To: PLN_PlanningCEQA; Deborah Bossmeyer
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project
No.265605 SCH No.2012011048

BZ-1 | Having been a resident of Civita for two years, I am familiar with the pedestrian and vehicle traffic patterns. My living room and master bedroom face onto Via Alta very close to the entrance of Lucent. The concerns I have stem from watching the day to day problems on Via Alta with the current traffic flow.

BZ-2 | *The first concern is - will there be any size limitations on vehicles traveling Via Alta or Franklin Ridge? Two to three times a month I watch as large moving or delivery trucks attempt to exit Lucent II or Altana only to end up blocking Via Alta in both directions for 20 minutes at a time. They cannot complete left turns in one attempt. I have seen signs, trees, landscaping, poles, etc. struck and flattened. For this to happen during morning or afternoon rush hour would cause a major backup.

BZ-3 | *The second concern is - what additional pedestrian crossing assistance is planned? From the top to the bottom of the hill there are no lights or crosswalks for pedestrians. The majority of the Civita residents at this time live on the west side of Via Alta. With the opening of the park and soon the community center, foot traffic across Via Alta will only increase. How do you plan to make it safe to cross?

BZ-4 | And in keeping with that thought, if the school that is planned at the bottom of the hill does open, the flow of pedestrian traffic will increase even more and in this case, it will be small children trying to cross. What additional safety plans have been developed to offset increased pedestrian populations (i.e. new neighborhoods, the school, community events) ?

I will await your response.

Sincerely,
Michael Sullivan
8397 Distinctive Drive
San Diego, CA 92108

Letter BZ: Michael Sullivan

BZ-1: The commenter provides some personal background information regarding living within Civita off of Via Alta and being familiar with current traffic patterns.

Please see the response to comment F-2.

BZ-2: The commenter asks if there will be any size limitation for vehicles traveling Via Alta or Franklin Ridge Road, particularly with regards to moving or delivery trucks during AM or PM rush hour.

Please see the response to comment F-2. This comment raises general concerns related to over-sized vehicles, but does not specifically raise issues concerning the adequacy of the DEIR. Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR.

BZ-3: The commenter inquires what additional pedestrian crossing assistance is planned for safe crossing across Via Alta to places such as the park and planned community center.

Please see the responses to comments F-4 and F-5.

BZ-4: The commenter has concerns with increased pedestrian traffic resulting from new neighborhoods, the proposed school, and community events, especially with regards to small children crossing the roadway.

Please see the responses to comments F-4 and F-5.

From: FIROOZ <rasoulif@msn.com>
Sent: Sunday, May 28, 2017 6:53 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Messa Community Plan Amendment Roadway connection-Project. No 265605 SCH NO. 2012011048

CA-1

The properties were sold with a clear message of " Kids can walk to school" in this quiet neighborhood. As a result for many parents that was one of the primary reasons to purchase a property here. Now that you planning to convert a quiet street to a major highway corridor, are you going to accept responsibility for any increase in accidents resulting from your decision?

Best,
F. Rasouli

Sent from my iPad

Letter CA: F. Rasouli

CA-1: The commenter expresses concern for the safety of children walking to school and asks if the City will take responsibility for any increase in accidents resulting from the proposed roadway connection.

Please see the responses to comments F-2, F-4, and F-5. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: mgehring@aol.com
Sent: Sunday, May 28, 2017 10:19 AM
To: PLN_PlanningCEQA
Cc: laura4652@yahoo.com
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project 265605

Hello,
Please answer the following questions about Serra Mesa Community Plan Amendment Roadway Connection Project 265605.
Thanks,
Mike Gehring

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.

a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?

b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity?

If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?

3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.

a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?

b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?

c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?

d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?

e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.

a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?

b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:

- Potential new public transit corridors to reduce vehicles;

CB-1

CB-1
cont.

- Potential new Riverwalk trolley station and relocated trolley station at Mission;
- Valley Center to increase ridership;
- Potential new skyways to UCSD and University Heights;
- Planned and potential new walking multi-use paths;
- Planned and potential new cycling paths;
- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa.

Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- Easy vehicular ingress/ egress in multiple directions increases crime rates;
- Proposed regional traffic impacts residential neighborhoods;
- Proposed regional traffic negatively impacts property values;
- Proposed regional traffic impacts tranquility, peace and quiet;
- Proposed regional traffic impacts nature, air quality and biology;
- The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
- Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
- Why hasn't the Draft EIR proposed better solutions?

The so-called connector road was initially placed into a 30-yearold plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what?

... perhaps cutting one or two minutes from someone's commute (and even that is debatable).

7. "The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection."

CB-1
cont.

Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless

8. The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?

9. Stop pushing outdated planning concepts. Where does it end, when does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution?

10. The City seems to be at odds with itself. It knows we need more mass transit for the future. It knows people's driving habits must change. But at the same time the City enables this behavior. How do you get people to stop driving when the City keeps building more ways for cars to go?

Letter CB: Mike Gehring

CB-1: The commenter requests answers to several comments and questions about the proposed roadway connection that follow in his email. Please see response to comment CB-2.

CB-2: The commenter's numerous comments and questions are verbatim with what is included in Save Civita's General and Technical Talking Points and Technical Comments and Questions About the DEIR for the Serra Mesa Community Plan Amendment Street Connection (Save Civita), which are included in Letter F. Please see the responses to comments F-2 and F-3 through F-11.

From: linda mccormick <lindaclaire10@yahoo.com>
Sent: Monday, May 29, 2017 11:00 AM
To: PLN_PlanningCEQA
Subject: Civita Extension

CC-1 | Please do not allow the connector which will destroy this middle income community. It will utterly destroy its “walkable” character that gives a sense of community and family values.

Linda McCormick7
7648 Civita Blvd.
San Diego CA 92108

Letter CC: Linda McCormick

CC-1: The commenter expresses opposition to the proposed roadway connection and states that it will destroy the community's walkable character.

Please see the responses to comments F-4, F-5, and R-1. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: George <wolfegh@sbcglobal.net>
Sent: Monday, May 29, 2017 6:24 PM
To: PLN_PlanningCEQA
Subject: Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project: Project No. 265605
Attachments: FRANKLIN ROAD PLAN RESPONSE(EXPANDED).docx

TO:City Planning Dept. contact Planner Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010 2nd Avenue, MS 413, San Diego, CA 92101;

EMAIL: planningCEQA@sandiego.gov

CD-1

AS A MEMBER OF THE SERRA MESA COMMUNITY FOR OVER 50 YEARS, I WANT TO REQUEST THAT THE FRANKLIN RIDGE PROJECT BE STOPPED FOR THE FOLLOWING VERY GOOD REASONS:

CD-2

1. WHEN THE CIVITA DEVELOPMENT WAS ORIGINALLY APPROVED IT ONLY PLANNED FOR AN EMERGENCY TYPE ROAD BE PROVIDED. NOT FOR THE HIGHWAY SIZE ROAD. LET'S STAY WITH THE ORIGINAL PLAN! DID THE FUTURE CITY PLAN FOR A FRANKLIN ROAD ANYWAY AT THAT TIME?

CD-3

2. WHEN THE CIVITA DEVELOPMENT WAS ORIGINALLY APPROVED IT INCLUDED A PARK NEXT TO PHYLLIS PLACE. THIS NEW PROPOSED PLAN PUSHES THE PARK UNDER THE HIGH VOLTAGE POWER LINES. NOT ACCEPTABLE TO THE POWER LINE SAFETY PERMITS.WITHOUT THE PARK THEN STOP THE FRANKLIN ROAD.

CD-4

3. THE PLANNING FOR THE HIGHWAY 163 INTERSECTION WITH FRIARS AND HIGHWAY I-8 ARE IN FINAL STAGES TO REMOVE TRAFFIC PROBLEMS IN AND AROUND THE FRIARS RD/ CIVITA AREA. THE FRANKLIN ROAD PROJECT IS NOT NEEDED! DURING SD CITY COUNCIL CIVITA APPROVAL MEETING (ABOUT 10 YEARS AGO) I SUGGESTED ADDING HELICOPTER PORTS IN CIVITA TO REDUCE AUTO TRAFFIC- THEY LAUGHED-BUT WOULD STILL BE A SOLUTION!

CD-5

4. HIGHWAY I-8 ALREADY HAS MAJOR TRAFFIC JAM PROBLEMS NORTH BOUND IN THE MORNING AM AND SOUTH BOUND IN THE AFTERNOON PM WITH NO PLANNED HIGHWAY SOLUTION. THE FRANKLIN ROAD JUST ADDS TO THE TRAFFIC MESS.EXCEPT THAT CITY PLANNING SHOULD BE PLANNING MORE HOUSING AND BUSINESS'S OUT WHERE PROPER PLANNING COULD BE MADE.

CD-6

5. TRAFFIC IS ALREADY BACKED-UP ON TO MURRAY RIDGE WITH EXTREME DELAYS AS SHOWN IN YOUR STUDY. IT WILL ONLY GET WORSE WITH FRANKLIN ROAD. CREATING 4-LANES DOES NOT LESSEN THE BACK-UP TO THE LOG-JAMMED FREEWAY, JUST LIKE LOS ANGELES.STOP THE FRANKLIN RD PROJECT.

CD-7

6. HOME OWNERS ON MURRAY RIDGE WILL NOT BE ABLE TO HAVE ANY STREET PARKING WITH 4-LANE TRAFFIC.SOME HOUSES HAVE MORE THAN 2 CARS AND WOULD NEED TO PARK BLOCKS AWAY. STOP THE FRANKLIN RD PROJECT 4-LANES ON MURRAY RIDGE.

- | | |
|------|---|
| CD-8 | 7. HOME OWNERS ON MURRAY RIDGE WILL NOT BE ABLE TO GET IN OR OUT OF THERE DRIVEWAYS WITH 4-LANE TRAFFIC. STOP THE FRANKLIN RD PROJECT 4-LANES ON MURRAY RIDGE. |
| CD-9 | 8. THE CHURCH'S ON BOTH SIDES OF I-805 WILL HAVE MAJOR ENTRY/EXIT PROBLEMS.THE CHURCH TO THE NORTH WILL HAVE ENTRY PROBLEMS FROM THE NORTH AND EXIT PROBLEMS TO THE SOUTH. THE CHURCH ON THE SOUTH WILL HAVE ENTRY PROBLEMS FROM THE SOUTH WHILE THEY WILL HAVE EXIT PROBLEMS TO THE NORTH. STOP THE FRANKLIN RD PROJECT 4-LANES ON BOTH MURRAY RIDGE AND PHYLLIS PLACE.. |

QUESTIONS I DESIRE YOU TO ANSWER:

- | | |
|-------|---|
| CD-10 | 1. WILL THE 4-LANES ON MURRAY RIDGE RD ALLOW FOR PARKING NORTH OF ENCINO, BIKE LANES ONLY, OR NONE? |
| CD-11 | 2. HOW MUCH WIDTH DOES THE 4-LANES ON MURRAY RIDGE NEED? |
| CD-12 | 3. HOW WIDE IS MURRAY RIDGE JUST NORTH OF ENCINO? |
| CD-13 | 4. THIS WORKS FOR ME WITH ONLY 3 LANES ON MURRAY RIDGE: IT SEEMS THAT 3-LANES, WITH 2 LANES SOUTHBOUND BEFORE ENCINO, AND 3 LANES AT MISSION CENTER, WITH 2 LANES NORTH BOUND BEFORE MISSION CENTER (1 FOR LEFT TURN AND 1 FOR THRU TRAFFIC). THE CENTER LANE WOULD BE NORTHBOUND ½ THE WAY AND SOUTHBOUND THE OTHER HALF. WHY NOT? |
| CD-14 | 5. WHY DOES PHYLLIS PLACE NEED 4 LANES SOUTH OF THE PROPOSED FRANKLIN ROAD? |
| CD-15 | 6. WILL THERE BE LEFT TURN LANES BOTH DIRECTIONS TO ENCINO ON MURRAY RIDGE? |
| CD-16 | 7. WILL THERE BE A LEFT TURN LANE FROM MURRAY RIDGE INTO THE NORTH CHURCH? |
| CD-17 | 8. WILL THERE BE SOLID LINES ON MURRAY RIDGE NORTH FROM I-805 TO MISSION CENTER RD? |
| CD-18 | 9. HAS THE MURRAY RIDGE ROAD CONSTRUCTION BEEN DESIGNED TO WITHSTAND THE PROPOSED AMOUNT OF TRAFFIC (WEIGHT) OR THE STALLED AUTOS DUE TO JAMMED TRAFFIC? |
| CD-19 | 10. THE SERRA MESA AREA WAS ASSESSED A FEE FOR THE MISSION CENTER ROAD CONSTRUCTION. WILL THERE BE ANY ASSESSMENT DUE TO THE FRANKLIN ROAD? |

THANK YOU FOR YOUR REVIEW AND ANSWERS.
 GEORGE WOLFE
 2357 MURRAY RIDGE RD
 SAN DIEGO, CA 92123-3936
 PHONE:. 858-565-8188

TO; City Planning Dept. contact Planner Susan Morrison, Environmental Planner, City of San Diego Planning Department.

Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project Project No. 265605

AS A MEMBER OF THE SERRA MESA COMMUNITY FOR OVER 50 YEARS, I WANT REQUEST THAT THE FRANKLIN RIDGE PROJECT BE STOPPED FOR THE FOLLOWING REASONS:

- 1. WHEN THE CIVITA DEVELOPMENT WAS ORIGINALLY APPROVED IT ONLY PLANNED FOR AN EMERGENCY TYPE ROAD BE PROVIDED. NOT FOR THE HIGHWAY SIZE ROAD. LET'S STAY WITH THE ORIGINAL PLAN! DID THE FUTURE CITY PLAN FOR A FRANKLIN ROAD ANYWAY AT THAT TIME?**
- 2. WHEN THE CIVITA DEVELOPMENT WAS ORIGINALLY APPROVED IT INCLUDED A PARK NEXT TO PHYLLIS PLACE. THIS NEW PROPOSED PLAN PUSHES THE PARK UNDER THE HIGH VOLTAGE POWER LINES. NOT ACCEPTABLE TO THE POWER LINE SAFETY PERMITS.WITHOUT THE PARK THEN STOP THE FRANKLIN ROAD.**
- 3. THE PLANNING FOR THE HIGHWAY 163 INTERSECTION WITH FRIARS AND HIGHWAY I-8 ARE IN FINAL STAGES TO REMOVE TRAFFIC PROBLEMS IN AND AROUND THE FRIARS RD/ CIVITA AREA. THE FRANKLIN ROAD PROJECT IS NOT NEEDED! DURING SD CITY COUNCIL CIVITA APPROVAL MEETING (ABOUT 10 YEARS AGO) I SUGGESTED ADDING HELICOPTER PORTS IN CIVITA TO REDUCE AUTO TRAFFIC-THEY LAUGHED-BUT WOULD STILL BE A SOLUTION!**
- 4. HIGHWAY I-8 ALREADY HAS MAJOR TRAFFIC JAM PROBLEMS NORTH BOUND IN THE MORNING AM AND SOUTH BOUND IN THE AFTERNOON PM WITH NO PLANNED HIGHWAY SOLUTION. THE FRANKLIN ROAD JUST ADDS TO**

CD-20
cont.

THE TRAFFIC MESS.EXCEPT THAT CITY PLANNING SHOULD BE PLANNING MORE HOUSING AND BUSINESS'S OUT WHERE PROPER PLANNING COULD BE MADE.

- 5. TRAFFIC IS ALREADY BACKED-UP ON TO MURRAY RIDGE WITH EXTREME DELAYS AS SHOWN IN YOUR STUDY. IT WILL ONLY GET WORSE WITH FRANKLIN ROAD. CREATING 4-LANES DOES NOT LESSEN THE BACK-UP TO THE LOG-JAMMED FREEWAY, JUST LIKE LOS ANGELES.STOP THE FRANKLIN RD PROJECT.**
- 6. HOME OWNERS ON MURRAY RIDGE WILL NOT BE ABLE TO HAVE ANY STREET PARKING WITH 4-LANE TRAFFIC.SOME HOUSES HAVE MORE THAN 2 CARS AND WOULD NEED TO PARK BLOCKS AWAY. STOP THE FRANKLIN RD PROJECT 4-LANES ON MURRAY RIDGE.**
- 7. HOME OWNERS ON MURRAY RIDGE WILL NOT BE ABLE TO GET IN OR OUT OF THERE DRIVEWAYS WITH 4-LANE TRAFFIC. STOP THE FRANKLIN RD PROJECT 4-LANES ON MURRAY RIDGE.**
- 8. THE CHURCH'S ON BOTH SIDES OF I-805 WILL HAVE MAJOR ENTRY/EXIT PROBLEMS.THE CHURCH TO THE NORTH WILL HAVE ENTRY PROBLEMS FROM THE NORTH AND EXIT PROBLEMS TO THE SOUTH. THE CHURCH ON THE SOUTH WILL HAVE ENTRY PROBLEMS FROM THE SOUTH WHILE THEY WILL HAVE EXIT PROBLEMS TO THE NORTH. STOP THE FRANKLIN RD PROJECT 4-LANES ON BOTH MURRAY RIDGE AND PHYLLIS PLACE...**

QUESTIONS I DESIRE YOU TO ANSWER:

- 1. WILL THE 4-LANES ON MURRAY RIDGE RD ALLOW FOR PARKING NORTH OF ENCINO, BIKE LANES ONLY, OR NONE?**
- 2. HOW MUCH WIDTH DOES THE 4-LANES ON MURRAY RIDGE NEED?**

CD-20
cont.

3. **HOW WIDE IS MURRAY RIDGE JUST NORTH OF ENCINO?**
4. **THIS WORKS FOR ME WITH ONLY 3 LANES ON MURRAY RIDGE: IT SEEMS THAT 3-LANES, WITH 2 LANES SOUTHBOUND BEFORE ENCINO, AND 3 LANES AT MISSION CENTER, WITH 2 LANES NORTH BOUND BEFORE MISSION CENTER (1 FOR LEFT TURN AND 1 FOR THRU TRAFFIC). THE CENTER LANE WOULD BE NORTHBOUND ½ THE WAY AND SOUTHBOUND THE OTHER HALF. WHY NOT?**
5. **WHY DOES PHYLLIS PLACE NEED 4 LANES SOUTH OF THE PROPOSED FRANKLIN ROAD?**
6. **WILL THERE BE LEFT TURN LANES BOTH DIRECTIONS TO ENCINO ON MURRAY RIDGE?**
7. **WILL THERE BE A LEFT TURN LANE FROM MURRAY RIDGE INTO THE NORTH CHURCH?**
8. **WILL THERE BE SOLID LINES ON MURRAY RIDGE NORTH FROM I-805 TO MISSION CENTER RD?**
9. **HAS THE MURRAY RIDGE ROAD CONSTRUCTION BEEN DESIGNED TO WITHSTAND THE PROPOSED AMOUNT OF TRAFFIC OR THE STALLED AUTOS DUE TO JAMMED TRAFFIC?**
10. **THE SERRA MESA AREA WAS ASSESSED A FEE FOR THE MISSION CENTER ROAD CONSTRUCTION. WILL THERE BE ANY ASSESSMENT DUE TO THE FRANKLIN ROAD?**

**THANK YOU FOR YOUR REVIEW AND ANSWERS.
GEORGE WOLFE
2357 MURRAY RIDGE RD
SAN DIEGO, CA 92123-3936
PHONE: 858-565-8188**

Letter CD: George Wolfe

CD-1: The commenter provides an introductory statement regarding their submittal of comments for the project.

This comment is acknowledged.

CD-2: The commenter states that the original Civita development only approved an emergency type road and not a “highway size road.”

Please see the response to comment F-2. This comment does not address the adequacy of the DEIR.

CD-3: The commenter states that the new proposed plan pushes the park under the high voltage power lines.

The park would be located within the vicinity of the aboveground power lines with or without the proposed project. Please also see the response to comment I-5.

CD-4: The commenter references State Route 163/Friars Road and I-8 projects near the Civita area, stating the Franklin Ridge Road project is not needed. The commenter states they previously suggested adding helicopter ports in Civita to reduce traffic.

Please see the response to comment F-2. This comment does not address the adequacy of the DEIR.

CD-5: The commenter states that Franklin Ridge Road adds to the traffic problem at I-8 northbound in the morning and southbound in the afternoon. The commenter states that the City should focus more on housing and business “out where proper planning could be made.”

Please see the response to comment F-2. This comment does not address the adequacy of the DEIR.

CD-6: The commenter states that traffic already backs up to Murray Ridge Road with extreme delays as shown in the study, and that it will only get worse with Franklin Ridge Road.

Please see the response to comment P-1.

CD-7: The commenter states that home owners on Murray Ridge Road will not be able to have any street parking with 4-lane traffic.

Please see the response to comment P-1.

CD-8: The commenter states that home owners on Murray Ridge Road will not be able to get in or out of their driveways with 4-lane traffic.

Please see the response to comment P-1.

CD-9: The commenter states that the churches on both sides of I-805 will have major entry/exit problems.

Please see the response to comment G-116.

CD-10: The commenter questions if the 4 lanes on Murray Ridge Road allow for parking north of Encino, bike lanes only, or none.

Please see the response to comment V-3. The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road, providing a multi-modal linkage between the Mission Valley and Serra Mesa communities. The addition of parking or bike lanes north of Encino Avenue is not a project component of the proposed project, and it is not analyzed in the DEIR with respect to the proposed roadway connection. The comment does not raise issue regarding the adequacy of the DEIR.

CD-11: The commenter questions how much width the 4-lanes on Murray Ridge Road need.

Please see the responses to comments V-3 and CD-10.

CD-12: The commenter questions the width of Murray Ridge Road just north of Encino Avenue.

Please see the responses to comments V-3 and CD-10.

CD-13: The commenter discusses various lane configurations for Murray Ridge Road.

Please see the responses to comments V-3 and CD-10.

CD-14: The commenter questions why Phyllis Place needs 4 lanes south of the proposed Franklin Ridge Road.

Please see the responses to comments V-3 and CD-10.

CD-15: The commenter questions if there will be left turn lanes both directions to Encino Avenue on Murray Ridge Road.

Please see the responses to comments V-3 and CD-10.

CD-16: The commenter questions if there will be a left turn lane from Murray Ridge Road into the North Church.

Please see the responses to comments V-3 and CD-10.

CD-17: The commenter questions if there will be solid lines on Murray Ridge Road north from I-805 to Mission Center Road.

Please see the responses to comments V-3 and CD-10.

CD-18: The commenter questions if Murray Ridge Road construction has been designed to withstand the proposed amount of traffic or stalled autos due to jammed traffic.

Please see the responses to comments V-3 and CD-10.

CD-19: The commenter questions if the Serra Mesa area was assessed a fee for the Mission Center Road construction and if there will be any assessment due to Franklin Ridge Road.

Please see the responses to comments V-3 and CD-10.

CD-20: This comment repeats the previous comments in CD-1 through CD-19. Please see responses to comments CD-1 through CD-19 above.

From: Kyle Hinsz <khinsz@hotmail.com>
Sent: Monday, May 29, 2017 2:40 PM
To: PLN_PlanningCEQA
Cc: Morrison, Susan; Kyle Hinsz
Subject: Project No. 265605 - Serra Mesa Community Plan Amendment Roadway Connection Project
Attachments: RE_Serra_Mesa_Plan_Amendment-No265605.pdf

Susan Morrison,

Please find my comments about the latest EIR for project 265605 Serra Mesa Community Plan Amendment Roadway Connection Project attached. Thanks.

Kyle Hinsz

CE-1

RE: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605
Community Plan Area: Serra Mesa
Council District: 7

CE-2 First, I want to express my disappointment with the negligence in the draft EIR. One of the most glaring issues is the suggestion that both the identified environmentally superior alternatives would lead to greater impacts in air quality and GHG emission (Executive Summary, Environmentally Superior Alternative section - page S-5). The report fails miserably to account for the fact that there is a set \$50 million in funding that if spend on this road will *not* be available for improvements to the Mission Valley infrastructure. At a high level, this project is about building a four lane road to take cars from Friars road through Civita and into Serra Mesa for access to 805. The environmentally superior alternatives still allows motorists to directly and efficiently go from Friars to 163, from which they can then access 805 leveraging freeways (directly going north, or by 8 going south), and these environmentally superior alternatives provide additional funds for further enhancements to this route. There is only a half mile difference between these freeway onramps from the location cars would leave Friars to head up to the new connection, and I don't find any evidence in the report to suggest that a route up Mission Valley with two new stop lights in addition to the multiple existing stop lights leads to reduced GHG emissions when compared to investment in Friars road to keep cars at their current speed to the 163 freeway onramp. Given this is an Environmental Impact Report, it needs to address the increased GHG emissions of the majority traffic stopping at the additional stop lights for the entire route from Friars to the freeway, and the environmental impacts of not leveraging these funds for improvements to Friars road.

CE-3 The report also states that the project is consistent with the City of San Diego's Bicycle Master Plan and pedestrian goals. To suggest the four lane road is the preferred option for bicycle goals is completely wrong. I have firsthand experience with people taking longer bike routes so they can use canyon trails, and anyone can visit the map section of bikesd.org and see that the bike map "... allows you to pick routes based on how much stress and traffic you'd like to contend with." When reviewing Table 5.1-1 the feeling of negligence starts teetering toward fraudulent when the proposed four lane road, over designated park space, is listed as consistent with the goals of every single different one of city's 45+ objectives, including those around bikes, pedestrians, and open spaces. Given the diversity of the over 45 goals listed I find it hard to imagine any project could be consistent with 100% of them, but this report simply blankets table 5.1-1 with "The proposed CPA is consistent/conformance with this goal/policy" for every single goal/policy row.

CE-4 One of my favorite things about San Diego is that different neighborhoods have different feels; gas lamp is different than North Park, is different than Pacific Beach. Serra Mesa low density housing with CVS is different than Mission Valley's high density housing with Macy's and Ross. If amendments are forced upon the Sera Mesa Community Plan and the road is developed, this will change. There will be the immediate impacts to the people walking their dogs to the new dog parks, and families using the designated park area. And longer term, if this road is developed the community will also be under constant pressure for re-zoning as developers see opportunity to expand Mission Valley's higher density housing and shopping into Serra Mesa. If Serra Mesa's community plan is brushed aside with this road development, the community life will be degraded and the Sera Mesa's uniqueness will fade.

CE-5

Serra Mesa residents need help. We need help preserving our community plan with a vote for parks, a vote for bikes, a vote for pedestrians, a vote for neighborhoods, a vote for community, and a vote for environmentally superior alternatives.

Kyle Hinsz
Serra Mesa Resident
May 2017

Letter CE: Kyle Hinsz

CE-1: This comment is an introductory statement that expresses the commenter's opposition to the proposed project.

Please see the response to comment F-2.

CE-2: This comment takes issue with the conclusion in the DEIR that both alternatives would lead to greater impacts to air quality and GHG emissions. The comment states that the EIR does not consider that if the proposed project is not constructed, there would be \$50 million available to be spent on improvements to Mission Valley infrastructure.

According to the CEQA Guidelines Section 15358(b) impacts to be analyzed in the EIR must be "related to physical changes" in the environment, not economic issues. In addition, the comments are speculative in nature. Therefore, the EIR does not consider the potential other projects that could be implemented with the money saved if the proposed project is not implemented.

GHG emissions associated with the proposed project are analyzed in Section 5.10 of the DEIR. As detailed therein, the proposed project would reduce Vehicle Miles Traveled (VMT), and therefore would reduce associated vehicle emissions compared to the existing condition. No revisions to the FEIR are warranted as a result of this comment.

CE-3: This comment alleges that the project is not consistent with the Bicycle Master Plan and that it is not consistent with the goals and policies of the General Plan and Serra Mesa Community Plan.

Please refer to Section 5.1, *Land Use*, for a detailed discussion of why the project is consistent with these plans. Although the commenter does not agree with the conclusions reached within Table 5.1-1, specific policies disagreed with are not specified, nor is any evidence provided as to why the project would conflict with the goals and policies of the General Plan. Concerning the Bicycle Master Plan, this plan includes a Class II bike lane from Phyllis Place southwards to the Quarry Falls development, which would be implemented by the proposed project. Therefore, it is consistent with the Bicycle Master Plan. No revisions to the FEIR are warranted as a result of this project.

CE-4: This comment alleges that the road would immediately impact pedestrians and those using the park areas and states that long-term impacts of the project would generally lead to growth-inducing effects.

Please see the responses to comments F-4 and F-5 regarding pedestrian safety. Please see the responses to K-25, K-26, and K-27 for comments related to growth-inducing effects and parks.

CE-5: This comment generally states the commenter's opposition to the proposed project.

Please see the response to comment F-2.

From: Andrew Michajlenko <amichajlenko@att.net>
Sent: Monday, May 29, 2017 5:50 PM
To: PLN_PlanningCEQA
Cc: Andrew Michajlenko
Subject: Project No. 265605 - Serra Mesa Community Plan Amendment Roadway Connector
Attachments: 2017-0529_Michajlenko_DEIR Public Comment.pdf

Attention: Ms. Susan Morrison

Re: Project No. 265605
Serra Mesa Community Plan Amendment Roadway Connector
DEIR Public Comment

CF-1 | Please find attached public comment to DEIR for the Serra Mesa Community Plan Amendment Roadway Connector.

Sincerely,

Andrew Michajlenko
619-606-1809

May 29, 2017

Andrew Michajlenko
7838 Inception Way
San Diego, CA 92018

Attention:

Ms. Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Sent via email: planningCEQA@sandiego.gov

Re: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605

Ms. Morrison:

On April 29, 2017, the City's second largest park was opened by Mayor Kevin Faulconer within *Civita*, the City's only new transit oriented, USGBC LEED Certified mixed-use village. What was an old rock quarry off Friars Road between Mission Center Road and Qualcomm Way is being transformed into a perfectly walkable, mixed-use neighborhood.

The recently recirculated Draft Environmental Impact Report (DEIR) for the Serra Mesa Community Plan Amendment Roadway Connection Project (Connector Project) shows traffic volume within *Civita* will significantly increase with the Connector Project; projecting the two primary residential streets, Via Alta and Franklin Ridge, both 2-lane collector streets within the residential district of *Civita* will share 34,000 average daily trips (**one car every six seconds**). These steeply graded, pedestrian oriented streets, fronted by residential in close proximity on both sides are proposed to handle a continuous flow of regional freeway traffic into and out of Mission Valley and connecting to I-805.

CF-2

The Connector Project will effectively split *Civita* into three separate parts by funneling waves of traffic from the I-805 freeway through a mixed-use, family-oriented neighborhood. Regional traffic will wall thousands of its residents off from parks, trails, and each other only to provide a highly debatable "short-cut" to wherever for whomever, with no regard to the disruption and safety issues it will create.

Via Alta and Franklin Ridge roadway segments were designed and constructed with only two crosswalks, approximately ½ mile between each other, located at the very top and very bottom of the long, steep roadways which were designed to expeditiously move freeway traffic at 35 mph without intermediate stop signs or pedestrian crossings. Extending from *Civita* Park to Via Alta at approximate third points are decomposed granite finger trails designed for resident access to *Civita* Park. Unfortunately, the finger trails do not meet up with crosswalks at Via Alta; precluding over 500 residential dwellings West of Via Alta from having direct, convenient and safe pedestrian access to the newly constructed *Civita* Park. Introduce the Connector Project traffic volume and lack of pedestrian crosswalks and residential West of Via Alta is severed from

CF-2
cont.

Civita Park. Franklin Ridge likewise has similar design and construction issues which will preclude access for future residents East of Franklin Ridge. The proposed Connector Project will also eventually split in half another park being designed for the Serra Mesa community at the top of Civita adjacent to Phyllis Place.

CF-3

How does the DEIR address pedestrian safety and pedestrian crosswalks along the impacted Via Alta and Franklin Ridge roadway segments North of Civita Blvd? If it does not address, why not? How will pedestrian safety be impacted?

CF-4

How does the DEIR address traffic speed and traffic calming along the impacted Via Alta and Franklin Ridge roadway segments North of Civita Blvd? If it does not address, why not?

CF-5

Has the DEIR considered introduction of additional pedestrian crosswalks or stop signs along the impacted Via Alta and Franklin Ridge roadway segments North of Civita Blvd as mitigation for traffic calming and pedestrian safety? If it has not considered, why not? What would be the impact of inclusion?

CF-6

The California Climate Action Plan (CAP), signed into State Law in 2015, mandates communities to reduce greenhouse gas emissions by 50% by 2035. The City's response to CAP includes planning for Smart Growth, mixed-use, transit-oriented, neighborhood development where residents live, work, and play within the same community. Civita is a poster child of these progressive planning principles with design recognition from the Urban Land Institute (ULI), Building Industry Association (BIA), and a Gold Certification from USGBC LEED Neighborhoods. The City maintains residents need to live in denser communities so as to accommodate future housing needs while reducing VMTs. Civita was designed with that in mind with 1.2M square feet of planned commercial, retail, and office space, 3,000 multi-family residences, and 1,750 apartments. Civita is a thriving, growing neighborhood with residents bicycling, exercising, walking with toddlers and pets, and pushing baby strollers.

The Connector Project is diametrically opposed to Smart Growth by perpetuating ease of connection to interstate freeways and increased regional vehicle miles traveled (VMT). Freeway connectors that perpetuate regional traffic (VMT) and, thus, suburban sprawl are inconsistent with the City's CAP goals, the Mayor's "city of villages" concept, and Civita's environmental planning principles. The City should be reducing greenhouse gas emissions by planning for Smart Growth neighborhoods, like Civita, not promoting additional freeway connectors into/ out of Mission Valley.

How does the DEIR demonstrate the Connector Project will align with regional VMT reduction? Regional greenhouse gas reduction? The Climate Action Plan? If it does not include regional analysis, why not?

CF-7

The Mission Valley Community Planning Group is currently updating the Mission Valley Community Plan. The Community Planning Update Subcommittee (CPUS) most recent public sessions have been extensively related to CAP, land use planning alternatives, and regional vehicle inflow/ outflow from Mission Valley. Today, Mission Valley is an inflow employment hub with 4.0 jobs to employed resident. In other words, Mission Valley roadways are currently stressed by extensive quantities of daily workers who make their home elsewhere. The updated Mission Valley Community Plan will focus on Mission Valley as a Transient Priority Area promoting transit

CF-7
cont.

ridership and significant growth in new multi-family housing. At the latest CPUS meeting on May 12, 2017, the CPUS supported promoting a healthier balance of 2.1 jobs to employed resident to reduce inflow traffic, reduce regional VMT, and align with CAP. While Mission Valley will remain an employment center, dependency on the automobile will be reduced in favor of local residency, multi-modal transit and walkability. Progressive planning principles being embraced within the Community Plan Update may effectively demonstrate that the Connector Project is not needed. Furthermore, the CPUS may recommend that the Updated Community Plan remove the Phyllis Place Connector from the 1985 Mission Valley Community Plan.

How does the DEIR consider the proposed land use and traffic models associated with the Mission Valley Community Plan Update? If it does not, why not?

Does the DEIR clarify why the DEIR is progressing ahead of the Mission Valley Community Plan Update? If not, why is it progressing ahead of the Mission Valley Community Plan Update?

CF-8

If the DEIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805. At what cost? At the degradation of Civita, an Urban Land Institute award winning planned walkable village. Civita will be impacted by heavy volumes of non-stop regional traffic degrading the community's walkability, pedestrian safety, village character, and environmental quality. Freeway connectors do not belong within the residential district of Civita ... preserve the character and vision of Civita as San Diego's next walkable village by opposing the freeway connector.

Summary of Proposed Connector Impacts

CF-9

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district (1 car each 6 seconds, averaged);
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- Negatively impacts quality of life;
- Negatively impacts property values;
- Negatively impacts safe access to Civita Park;
- Negatively impacts safe access to Civita's future grade school;
- Negatively impacts safe access to Civita's recreation center and dog park;
- Negatively impacts tranquility, peace and quiet;
- Negatively impacts nature, air quality and biology;
- Slashes Serra Mesa's public park into two with a 4-lane collector intersection;
- Fails to embrace City's Smart Growth "city of villages" concept;
- Fails to embrace the City's Climate Action Plan;
- Fails to embrace the State's reduced regional VMT targets;
- Fails to address traffic calming within Civita;
- Fails to address pedestrian safety within Civita;
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this

community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.

Additional Technical Inquiries

1. The DEIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the DEIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge roadway segments encounter the high-volume of long-term traffic predicted, will the existing median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Via Alta and Franklin Ridge roadway segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4 mile lineal distance along Via Alta between pedestrian crossings and a 0.5 mile lineal distance along Franklin Ridge. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger and sever residences from Civita Park.
 - a. Did the DEIR review the projected volume of pedestrian traffic within Civita and how pedestrian traffic may impact the proposed connector roadway LOS? If not, why not? What are the impacts?
 - b. Did the Draft EIR review the distance between pedestrian crossings on Via Alta and Franklin Ridge Road? If not, why not? What are the impacts?
 - c. Did the DEIR review the introduction of additional pedestrian crossings on Via Alta and Franklin Ridge Road? If not, why not? What are the impacts?
 - d. Did the DEIR address the safety of pedestrian crossings for access to Civita Park? Civita's Resident Association Recreational Facility? Civita's Dog Park? and Serra Mesa's proposed public park at Phyllis Place? If not, why not? What are the impacts?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita? If not, why not? What are the projected impacts?
3. Did the DEIR address the impact of increased traffic and pedestrian safety for the future public school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not? What is the impact?
4. The Mission Valley Community Plan states on page 56, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa.
5. The proposed connector roadway segment between Phyllis Place and Franklin Ridge Road will require extensive grading as shown within the DEIR. The roadway segment will also divide a proposed public park into two.
 - a. Please clarify how significant grading for a 4-lane collector roadway dividing a park into two components was not deemed a less than significant visual impact?
 - b. Please clarify how the DEIR concludes the proposed significant grading has a less than significant impact on environmentally sensitive habitat?

CF-10
cont.

6. The DEIR traffic study does not include all known projects within Mission Valley. The Qualcomm SoccerCity Initiative as well as the proposed revised Specific Plan for Riverwalk are excluded. Why are these significant proposed developments excluded from the traffic study? If they were included within the traffic study, how would they impact the DEIR evaluation for traffic, noise, greenhouse gas?

CF-11

As a resident within Civita, Co-chair of the Mission Valley Community Plan Update Subcommittee, and architectural and urban designer by profession, I am most sincerely hopeful that San Diego City Planning Department will advance the concerns raised within regarding the significant challenges and negative community impacts proposed by the Connector Project.

A handwritten signature in black ink, appearing to read 'AM', with a horizontal line extending to the right.

Sincerely,
Andrew Michajlenko

Letter CF: Andrew Michajlenko

CF-1: The commenter provides an introductory statement regarding submittal of comments for the project.

This comment states that comments are attached within the letter (responses to these comments are provided below). This comment does not raise any specific issues requiring a response pursuant to CEQA. The specific comments raised in the pages that follow are listed separately along with the City's individual responses.

CF-2: The commenter provides background on the development of Civita and discusses numerous concerns regarding traffic volumes, splitting the community and proposed park adjacent to Phyllis Place, and lack of safe pedestrian access to the park.

Please see the responses to comments F-2, F-4, and F-5.

Please refer to DEIR Section 5.1, *Land Use*, for an analysis on land use compatibility and Section 5.2, *Transportation and Circulation*, for an analysis on traffic and pedestrian safety. Neither the redistribution of traffic nor the construction of roadway under the proposed project would result in a reasonably foreseeable indirect environmental impact, such as urban decay or deterioration. The proposed project does not introduce a new freeway. Physical decay and deterioration would be unlikely given the City neighborhoods immediately surrounding the project site are within an urban area where thousands of vehicles along roadways currently exist. The implementation of a roadway connection that connects these roadways would not result in urban decay or deterioration. No changes to the FEIR are warranted as a result of this comment.

CF-3: The commenter questions how the DEIR addresses pedestrian safety and pedestrian crosswalks along Via Alta/Franklin Ridge Road.

Please see responses to comments F-4 and F-5.

CF-4: The commenter questions how the DEIR addresses traffic speed and traffic calming along Via Alta/Franklin Ridge Road.

Please see responses to comments F-4 and W-1.

CF-5: The commenter questions if the DEIR considered the introduction of additional pedestrian crosswalks or stop signs along Via Alta/Franklin Ridge Road as mitigation for traffic calming and pedestrian safety.

Please see responses to comments F-4, F-5, and W-1.

CF-6: The commenter discusses Climate Action Plan and Smart Growth initiatives with respect to Civita. The commenter questions how the DEIR demonstrates the project will align with regional VMT reduction, regional greenhouse gas reduction, and the Climate Action Plan.

Please see the response to comment G-87. The VMT analysis shows that traffic currently taking a circuitous route from Serra Mesa and surrounding neighborhoods to Mission Valley would have a more direct connection with the proposed roadway connection, extending from Phyllis Place in Serra Mesa southward to Via Alta/Franklin Ridge Road in Mission Valley, reducing VMT and trip

lengths in the process. Meaning, the proposed project would provide a more direct connection for local trips in the Serra Mesa and Mission Valley communities, reducing the total miles traveled. The proposed project would follow the intent of SB 743, which does not oppose local and regional connections. Please see DEIR Section 5.2, *Transportation and Circulation*, and Section 5.3, *Air Quality*, for the analyses on reduced VMT.

Projected transportation sector emissions in the CAP are based on VMT. The project would be consistent with the goals and policies of the City's General Plan by increasing mobility options by including bike and pedestrian access and by providing a more direct route to transit in Mission Valley that would provide vehicle congestion relief in some areas and reduce VMT regionally. Improved local transportation provided by a new bicycle and pedestrian connection is consistent with the CAP's overarching land use and transportation strategy. Therefore, because the project's VMT is accounted for in the City's CAP and because the project is consistent with the mobility goals of the General Plan, the proposed project is considered consistent with the CAP and would not generate greenhouse gas emissions, either directly or indirectly, that would have a significant impact on the environment. Please see Section 5.10, Greenhouse Gases, of the DEIR for the analysis on regional greenhouse gas reduction and the CAP.

CF-7: The commenter discusses employment, traffic and housing trends in Mission Valley related to community support for reduced VMT and the CAP. The commenter questions how the DEIR considers the proposed land use and traffic models associated with the Mission Valley Community Plan Update and if the DEIR clarifies why it is progressing ahead of the Mission Valley Community Plan Update.

Regarding the DEIR considering proposed land use and traffic models associated with the Mission Valley Community Plan Update, it is acknowledged that the Mission Valley Community Plan Update is in progress. This comment does not address the adequacy of the DEIR.

Please see the response to comment F-8 with regards to why the City is advancing the proposed project ahead of the Mission Valley Community Plan Update. The Mission Valley Community Plan Amendment Consistency Alternative was considered but ultimately rejected. As detailed in Section 9.4.1.2, the No Build/Remove from Mission Valley Community Plan Alternative would not include the construction and operation of the roadway connecting Phyllis Place to Franklin Ridge Road/Via Alta, and would remove language regarding the potential connection from the Mission Valley Community Plan. This alternative was rejected from further consideration because it would not meet any of the project objectives. The reasons the alternative would not meet any of the project objectives are provided within Section 9.4.1.2 of the DEIR. As further detailed within that section, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City's Climate Action Plan and Bicycle Master Plan include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended."

CF-8: The commenter provides similar general comments included in Save Civita, included as Letter F. The commenter expresses the opinion that freeway connectors do not belong in the residential district of Civita and requests that the character and vision of Civita be preserved by rejecting the project.

Please see the responses to comments F-2, F-4, F-5, and AH-3.

CF-9: The commenter's numerous comments and questions are verbatim with what is included in Save Civita, which are included in Letter F. Please see responses to comments F-2 and F-3 through F-11.

CF-10: The commenter's comments and questions #1 through #4 are verbatim with what is included in Save Civita, included as Letter F. Please see response to comments F-3, F-4, F-5, and F-9.

In Question #5, the commenter questions how significant grading dividing the park was not deemed a less than significant visual impact, and asks for clarification on how the DEIR concludes that the grading has a less than significant impact on environmentally sensitive habitat.

Please see the responses to comments G-37 and K-23 with respect to grading dividing the park and visual impacts.

Regarding grading impacts on environmentally sensitive habitat, a total of 0.25 acre of Tier II sensitive upland habitat (i.e., coastal sage scrub, including the disturbed form) would be directly affected by the proposed project due to grading and other ground-disturbing activities. Impacts would occur outside the MHPA; therefore, in accordance with the City's Biology Guidelines, a 1:1 mitigation ratio would be required for a total of 0.25 acre. Mitigation measure MM BIO-2 requires the demonstration of a total of 0.25 acre of credit from the San Diego Habitat Acquisition Fund or another approved mitigation bank (such as Marron Valley) to mitigate the loss of the disturbed coastal sage scrub (Tier II). Mitigation measure MM BIO-2 would reduce impacts on disturbed coastal sage scrub to less-than-significant levels, as the project would be required to ensure in-kind replacement of this sensitive vegetation community.

In Question #6, the commenter questions why all known projects within Mission Valley, including the Qualcomm Soccer City Initiative and Specific Plan for Riverwalk, are not included in the DEIR/traffic study with respect to traffic, noise and greenhouse gas impacts.

Reasonably foreseeable future projects are defined as those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome. As of the writing of the DEIR in March 2017 and the FEIR in July 2017, no development application has been submitted to the City for the proposed Qualcomm Soccer City Initiative. Please see Section 6.2, List of Cumulative Projects, and Figure 6-1, Cumulative Projects Location, of the DEIR, for cumulative projects considered in the analysis for cumulative impact to transportation and circulation, noise, and greenhouse gases. The Riverwalk Master Plan is included as number 13 on the List of Cumulative Projects and Cumulative Projects Location map. No changes to the FEIR are warranted as a result of this comment.

CF-11: The commenter provides closing remarks regarding the concerns raised in the letter. This comment is acknowledged.

From: H J Chang <biz.yjec@gmail.com>
Sent: Monday, May 29, 2017 4:48 PM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project Project No. 265605, Response Letter to Recirculated EIR (Environmental Impact Report)
Attachments: SerraMesaCommunityPlanRoadwayConnectionProject.docx

Henry J. Chang
2125 Apex Way
San Diego, CA 92108

May 20, 2017

City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101
ATTN: Susan Morrison, Environmental Planner

Re: Response to Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605

Dear Susan Morrison:

CG-1

I am a resident of the Civita community in Mission Valley. I am highly concerned about the connector road planned for construction which would connect Franklin Ridge Road with Phyllis Place, and I do not want it to be built.

My son was diagnosed with Leukemia last year and so we moved to the area to experience a safe and clean community environment. The connector road will jam up traffic, pollute the air, and destroy the community feel of the neighborhood. The testing done on these issues so far is inadequate to explain away these problems. An

CG-1
cont.

unacceptable and unhealthy level of pollution will undoubtedly arise if the connector road is built, and it will ruin the quality of life for my son and my family.

Our house is located overlooking the Civita dog park, at 2125 Apex Way. We are within 100 feet of the connector road construction area according to the Serra Mesa Community Plan: Recirculated Draft Environmental Impact Report.

CG-2

1. How will the construction pollution and noise adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?

2. What testing, if any, has been done to examine the adverse affects of the construction pollution and noise on sensitive receptors, such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?

CG-3

3. How will the actual connector road, if constructed, its pollution and noise, adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?

4. What testing, if any, has been done to examine the adverse affects of the actual connector road if constructed, its pollution and noise affecting sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?

CG-4

5. How will the construction pollution and noise adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living in the Apex community and users of the Civita dog park directly adjacent to the construction zone?

6. What testing, if any, has been done to examine the affects of the construction pollution and noise on sensitive receptors, such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living in the Apex community and users of the Civita dog park directly adjacent to the construction zone?

7. What if anything, will be done to mitigate the adverse affects of the connector road itself and its construction, on sensitive receptors, such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, others living within 100 feet of the construction zone, others living in the Apex community, and users of the Civita dog park directly adjacent to the construction zone?

CG-5

8. If the connector road is built, how safe will it be for a pedestrian to cross between Serra Mesa and Civita in terms of pollution, and safety from automobile proximity? My sons go to school at the Faith Community Church campus in Serra Mesa and if the connector road is built as a vehicular thoroughfare, I do NOT plan to use it as a pedestrian walkway between our home and their school, considering the likely increase in pollution and it's adverse affects on people's health, especially on sensitive receptors such as my son diagnosed with Leukemia, and my mother who resides at the residence who is a retired senior citizen.

CG-6

9. How badly, in terms of length of time and distance on the road, will cars be idling on Via Alta and Franklin Ridge Road on and in the area around the connector road, waiting for stop lights, after the connector road is built?

10. What will be the adverse affect of idling vehicles in the connector road area on sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, others living within 100 feet of the construction zone, others living in the Apex community, and users of the Civita dog park directly adjacent to the connector road site?

11. What will be done to mitigate pollution and noise from idling vehicles and increased traffic in the connector road area on sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, others living within 100 feet of the construction zone, others living in the Apex community, and users of the Civita dog park directly adjacent to the connector road site?

CG-7

Please explain how the connector road will benefit my family considering the adverse affects it will produce in terms of pollution, noise and quality of life in the community. It is my hope that the City of San Diego will consider the needs of residents living in proximity to the connector road, especially sensitive receptors whose health, quality of life, and life expectancies severely depend on a safe and non-polluted environment. Please respond to my questions, and address the adverse affects on my family if the connector road is built.

Sincerely,

Henry J. Chang

2125 Apex Way

San Diego, CA 92108

310-800-7927

Henry J. Chang
2125 Apex Way
San Diego, CA 92108

May 20, 2017

City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101
ATTN: Susan Morrison, Environmental Planner

Re: Response to Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605

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My son was diagnosed with Leukemia last year and so we moved to the area to experience a safe and clean community environment. The connector road will jam up traffic, pollute the air, and destroy the community feel of the neighborhood. The testing done on these issues so far is inadequate to explain away these problems. An unacceptable and unhealthy level of pollution will undoubtedly arise if the connector road is built, and it will ruin the quality of life for my son and my family.

Our house is located overlooking the Civita dog park, at 2125 Apex Way. We are within 100 feet of the connector road construction area according to the Serra Mesa Community Plan: Recirculated Draft Environmental Impact Report.

1. How will the construction pollution and noise adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?
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3. How will the actual connector road, if constructed, its pollution and noise, adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?
4. What testing, if any, has been done to examine the adverse affects of the actual connector road if constructed, its pollution and noise affecting sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living within 100 feet of the construction zone?
5. How will the construction pollution and noise adversely affect my family and sensitive receptors such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, and others living in the Apex community and users of the Civita dog park directly adjacent to the construction zone?
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7. What if anything, will be done to mitigate the adverse affects of the connector road itself and its construction, on sensitive receptors, such as my son diagnosed with Leukemia, my mother who resides at the residence who is a retired senior citizen, others living within 100 feet of the construction zone, others living in the Apex community, and users of the Civita dog park directly adjacent to the construction zone?
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9. How badly, in terms of length of time and distance on the road, will cars be idling on Via Alta and Franklin Ridge Road on and in the area around the connector road, waiting for stop lights, after the connector road is built?
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living in the Apex community, and users of the Civita dog park directly adjacent to the connector road site?

Please explain how the connector road will benefit my family considering the adverse affects it will produce in terms of pollution, noise and quality of life in the community. It is my hope that the City of San Diego will consider the needs of residents living in proximity to the connector road, especially sensitive receptors whose health, quality of life, and life expectancies severely depend on a safe and non-polluted environment. Please respond to my questions, and address the adverse affects on my family if the connector road is built.

Sincerely,

Henry J. Chang
2125 Apex Way
San Diego, CA 92108
310-800-7927

Letter CG: Henry J. Chang

CG-1: The commenter provides an introductory statement and expresses their opposition to the proposed project. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

CG-2: This comment asks what impacts have been identified from construction pollution and noise on sensitive receptors within 100 feet of the construction zone, and asks what testing has been done to examine the adverse effects of this potential impact.

The analysis found within Section 5.4, *Noise*, considers the potential impacts from construction activities to sensitive receptors in the area. The analysis of potential noise impacts is based on the Noise Technical Report prepared by Dudek in April 2015 for the proposed project, as well as additional construction noise and vibration calculations conducted for the DEIR. The analysis used data and modeling methodologies from FHWA's Roadway Construction Noise Model. A potentially significant impact (Impact NOI-1) from noise from project construction activities was identified for residences within 65 to 125 feet of the proposed project. However, with the implementation of Mitigation Measure NOI-1, which includes developing and implementing a noise control plan, the impact would be reduced to less than significant.

Section 5.3, *Air Quality*, discusses air quality conditions within the project area, and evaluates the potential impact to air quality from the proposed project. The Air Quality section uses the City's Significance Determination Thresholds to identify potential impacts. Construction activities were not found to exceed the City's significance thresholds for any criteria pollutant. No significant impacts to air quality were identified due to construction activities. No changes to the FEIR would be needed as a result from this comment.

CG-3: This comment asks what impacts have been identified from operational pollution and noise on sensitive receptors within 100 feet of the proposed roadway, and asks what testing has been done to examine the adverse effects of this potential.

The analysis found within Section 5.4, *Noise* considers the potential impacts from operation of the proposed project to sensitive receptors in the area. The analysis of potential noise impacts is based on the Noise Technical Report prepared by Dudek in April 2015 for the proposed project, as well as additional construction noise and vibration calculations conducted for the DEIR. Operational noise was analyzed as described in Appendix E (Noise Technical Report) using FHWA's Traffic Noise Model 2.5. Existing and future traffic noise was calculated based on the number and types of vehicles on the roadway, vehicle speeds, receiver locations, and other data, including noise attenuation from structures such as existing or future buildings or walls. No significant impacts due to noise were identified due to the operation of the proposed project.

Section 5.3, *Air Quality*, discusses air quality conditions within the project area, and evaluates the potential impact to air quality from the proposed project. The Air Quality section uses the City's Significance Determination Thresholds to identify potential impacts. Operational activities were not found to exceed the City's significance thresholds for any criteria pollutant. No significant impacts to air quality were identified due to operation of the proposed project. No changes to the FEIR would be needed as a result of this comment.

CG-4: The commenter asks what would be the adverse effects of, and what testing has been conducted to examine effects of, construction pollution and noise on sensitive receptors and others living in the Apex community or users of the Civita dog park directly adjacent to the construction zone.

The commenter asks what will be done to mitigate the adverse effects of the construction and operation of the proposed project on sensitive receptors within 100 feet of the construction zone, within the Apex community, or within the Civita dog park.

Please see the responses to comments CG-2 and CG-3 above. A potentially significant impact (Impact NOI-1) from noise from project construction activities was identified for residences within 65 to 125 feet of the proposed project. However, with the implementation of Mitigation Measure NOI-1, which includes developing and implementing a noise control plan, the impact would be reduced to less than significant. After sufficient analysis, found in Section 5.3, *Air Quality*, and Section 5.4, *Noise*, no other significant impacts from construction or operation activities were identified. No changes to the FEIR would be needed as a result of this comment.

CG-5: This comment is concerned with the safety of using the connector road as a pedestrian route between Civita and Serra Mesa.

Please see responses to comments F-4 and F-5. The proposed project includes pedestrian walkways/parkways. The proposed project would require two signalized intersections after construction of the connector road. As discussed above, no significant impacts to air quality in the area were identified as a result of operation of the proposed project. No changes to the FEIR are warranted as a result of this comment.

CG-6: This comment asks how long, and in what location, cars would be idling on Via Alta and Franklin Ridge road, waiting for stop lights, due to the proposed project. This comment also asks what the adverse impacts to sensitive receptors and others from idling vehicles would be, and what the mitigation for these impacts would be.

Section 5.2, *Transportation and Circulation*, of the DEIR discusses the road segments and intersections where the proposed project would result in delays. Section 5.3, *Air Quality*, of the DEIR includes analysis of potential pollutants from idling vehicles at intersections in the project area. Section 5.3.6 of the DEIR evaluates the potential pollutant concentrations, including air toxics such as diesel particulates that the proposed project could expose to sensitive receptors. This analysis concludes that the proposed project would not expose receptors to substantial pollutant concentrations; therefore, the impacts would be less than significant. Due to the less than significant impacts, no mitigation is required. No changes to the FEIR are warranted as a result of this comment.

CG-7: This comment is a conclusory statement that expresses the commenter's opposition to the proposed project.

This comment is acknowledged.

From: Mary Jean Johnson <maryjjohnson@earthlink.net>
Sent: Monday, May 29, 2017 11:46 AM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection #265605

Susan Morrison, Environmental Planner

CH-1

After reviewing the impacts that this road connection will have on the quality of life for the residents of Serra Mesa -- more air pollution and more traffic, I oppose this road.
I support the findings sent to you from the Serra Mesa Planning Group. Thank you.
Mary Jean Johnson- 2505 Mammoth Drive, San Diego, CA 92123

Letter CH: Mary Jean Johnson

CH-1: The commenter expresses opposition to the proposed roadway connector, expresses the opinion regarding quality of life impacts from air pollution and more traffic, and expresses support to the findings sent by the Serra Mesa Planning Group.

Please see response to comment F-2. This comment raises concerns related to air pollution and increased traffic affecting “quality of life for the residents of Serra Mesa,” but does not specifically raise issue regarding the adequacy of the DEIR. Moreover, both of these environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: james troy <jktroy@me.com>
Sent: Tuesday, May 30, 2017 3:58 PM
To: PLN_PlanningCEQA
Subject: Civita Connector
Attachments: JT EIR Letter 5-30-17.docx

CI-1

Please find attached questions about the 805 Connector at Civita.

Best,
James Troy

8424 Distinctive Dr
San Diego, CA 92108
619-548-1434

5-30-17

To: Email: PlanningCEQA@sandiego.gov

Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection

Project No. 265605 SCH No. [2012011048](#)

From: James Troy – jktroy@mac.com

8424 Distinctive Dr. San Diego, CA 92108

CI-2

As a 1 year home owner/resident to Mission Valley in a Shea Home development I do not understand why this connector has even been considered to plow through a very residential community. I attended the presentation by the city at the Mission Valley Planning Meeting this month and was floored to see what your research and outcome has produced. Also have read the most recent EIR from March 20, 2017. Here are my concerns and questions.

CI-3

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side. a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?

b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?

3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger. a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?

b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?

c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?

d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?

e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities. a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four land, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?

CI-3
cont.

b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

CI-4

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

5. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

CI-5

The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.

- Via Alta, one of the proposed main routes to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.

CI-6

Also, at the south end of Via Alta is a roundabout that connects Via Alta to a very narrow 2 lane street that is between apartments Circa 37 and West Park. There is also an apartment complex just inches from the road at this roundabout. Did the EIR take this in to account? If any traffic backs up through there it could potentially cause hundreds to be unable to reach their homes. Has there been any planning for this with additional traffic from connector road? What if a car breaks down or has an accident on these narrow streets? Would local emergency response crews be able to reach them (on single lane roads with bike path)? If so, how would they manage this?

- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.

- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.

CI-7

- Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... Perhaps cutting one or two minutes from someone's commute (and even that is debatable).

"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.

CI-7
cont.

2. Whether the road connection could serve as an emergency evacuation route.
 3. Whether it is feasible to make the road available for emergency access only.
 4. Whether pedestrian and bicycle access would be improved by the street connection.”
- Why weren’t these objectives, as directed by the City Council, used in the studies and analyses?
 - Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
 - What portions of the Recirculated DEIR address the four named objectives in the resolution?"
 - Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

Respectfully submitted,
James Troy

Letter CI: James Troy

CI-1: The commenter provides an introductory statement regarding submittal of comments for the project.

This comment states that comments are attached within the letter (responses to these comments are provided below). The specific comments raised in the pages that follow are listed separately along with the City's individual responses.

CI-2: The commenter states that he is a Mission Valley home owner/resident who attended the Mission Valley Planning Group meeting on May 3, 2018, and has read the recirculated DEIR and generally opposes the project.

This comment is an introductory statement expressing general opposition to the proposed project and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to specific comments are addressed in response to comments CI-3 through CI-7 below.

CI-3: The commenter's numerous comments and questions are verbatim with what is included in Save Civita, included as Letter F. Please see the responses to comments F-3 through F-6.

CI-4: The commenter's numerous comments and questions are verbatim with what is included in Save Civita, included as Letter F. Please see the responses to comments F-8 and F-9.

CI-5: The commenter's numerous comments and questions are verbatim with what is included in Save Civita, included as Letter F. Please see the responses to comment F-10.

CI-6: The commenter mentions the roundabout at Westside Drive and Via Alta and apartment complexes located at the south end of Via Alta, and questions if the DEIR considered these in regards to planning, car breakdowns or accidents, and emergency response.

Please see response to comment F-4 and F-5 regarding internal circulation and design within Civita. The proposed roadway and access points have been conceptually designed to be consistent with the City's Street Design Manual (2002) and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection.

The Via Alta roadway segment between Civita Boulevard and Westside Drive, the Westside Drive roadway segment between Mission Center Road and Via Alta, and Via Alta and Civita Boulevard intersection were considered in the analysis of the DEIR. Please see Section 5.2, *Transportation and Circulation*, and Section 7.7, Public Services and Facilities, of the DEIR for analyses regarding transportation impacts and emergency response.

CI-7: The commenter's numerous comments and questions are verbatim with what is included in Save Civita, included as Letter F. Please see the responses to comments F-10 and F-11.

From: albert villanueva <alboogy75@yahoo.com>
Sent: Tuesday, May 30, 2017 4:02 PM
To: PLN_PlanningCEQA
Subject: Community Plan Amendment Roadway Connection Project (265605)

To whom it may concern:

CJ-1

The idea sold to the residents of CIVITA was a safe walkable urban village. The projected maps showed a closed area that would restrict vehicle traffic which was a huge selling point. This freeway connector will decrease safety for pedestrians and increase road noise. There was also a potential for an elementary school projected this would be a huge risk for young children playing and walking home. The road is too narrow to allow for more non residents to use the area as a shortcut to the freeway. The residents of Civita hold firm that this is not a road we will support and the community of Serra mesa seems to have the same belief. Please take into account the families who have decided to raise a family in this area and the safety of its residents especially children. It is my firm belief that this freeway connector will limit people, especially those with Children from wanting to move to the area.

Thank you
Albert Villanueva
Civita resident (Frame and Focus)

Letter CJ: Albert Villanueva

CJ-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety and walkability, particularly with regards to children and the potential future elementary school in Civita.

Please see the responses to comments F-2, F-4, and F-5. The comment raises general issues related to pedestrian safety and walkability, but does not specifically raise issue regarding the adequacy of the DEIR. The comment states opposition to the proposed project but does not address the adequacy of the DEIR.

From: ADRIANA PAEZ <apaez73@gmail.com>
Sent: Tuesday, May 30, 2017 1:27 PM
To: PLN_PlanningCEQA
Subject: Fwd: Reject Serra Mesa community plan amendment street connection project # 265605 SCH #2012011048
Attachments: 20160624_150311.jpg

Hello,

I am opposed to this project which will affect the traffic, noise and safety of my pedestrian friendly community. Please respond to the following questions:

1. I have attached a picture of Via Alta. How do you propose to turn this 2 lane residential street into a major street? A major street requires 4 lanes.
2. There are other city projects to improve Texas/Qualcomm exit and mission valley exit off the 8 freeway. How will those projects improve the traffic in the area??
3. There will be a school at the corner of Civita and Via Alta. How will the flow of 11,000 cars be efficient on a 25 mile school zone??

Will wait for your response.
Thank you,

Adriana Paez

CK-1

CK-2



Letter CK: Adriana Paez

CK-1: The commenter expresses opposition to the project, citing traffic, noise, and pedestrian safety. The commenter questions how Via Alta will be converted from 2 lanes to 4 lanes, how other projects improving the Texas/Qualcomm and Mission Valley exits off of I-8 will improve area traffic, and how the flow of 11,000 cars will affect the proposed school at the corner of Civita and Via Alta.

According to the DEIR, Via Alta functions as a two-lane Major Arterial that has a landscaped median and left-turn pockets throughout, and Class II bike lanes in both directions. This recently constructed roadway is not proposed for widening from 2 to 4 lanes. The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road, providing a multi-modal linkage between the Mission Valley and Serra Mesa communities.

The project study area consists of 29 roadway segments, 24 intersections, 3 freeway mainline segments, and 2 metered freeway ramps. This area is bordered generally by Aero Drive to the north, Rio San Diego Drive to the south, and Mission Center Court and Northside Drive to the west and east, respectively. The Texas/Qualcomm and Mission Valley exits off of I-8 are therefore not included in the study area and were not included in the analysis of the proposed project. The project study area was determined by methodology consistent with the City of San Diego Traffic Impact Manual. The study area methodology is further described in Appendix D of the KOA Corporation Traffic Impact Study. The appendix details a diverted trip methodology.

Please see the response to comment F-4 regarding the commenter's concerns surrounding the potential future school at Via Alta and Civita Boulevard.

No changes to the FEIR are required as a result of this comment. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

CK-2: The commenter provides a street view photo of Via Alta that corresponds to the comment provided in CK-1. Please see the response to comment CK-1.

From: Judy McEntyre <jumcent@sbcglobal.net>
Sent: Tuesday, May 30, 2017 7:19 PM
To: PLN_PlanningCEQA
Subject: Planning Dept. Serra Mesa C. P. Amend. Road. Connect. Proj. SCH No. 2012011048
Attachments: Via Alta Planning Dept. protest letterMay 30.docx; Technical Comments and Questions about the Draft EIR for the Serra Mesa.docx

Letter to: PlanningCEQA@sanidiego.gov

From: Judith and Richard McEntyre (owners)
2633 Aperture Circle, San Diego, CA 92108 (Frame and Focus development adjacent to Via Alta at Civita)

Re: Reject Serra Mesa Community Plan Amendment Roadway Connection Project #265605 SCH No. 2012011048

CL-1

We voice our strong opposition to the San Diego City Planning Department plan [recirculated 2016's Draft EIR proposal (Environmental Impact Report)] to develop two streets in our Mission Valley's Civita development, Via Alta Road and Franklin Ridge Road, both of which are presently 2-lane residential streets, to serve as a primary freeway connector to the I-805, thereby slicing the wonderful Civita development completely into three (3) pieces, destroying the entire, well-developed, well-planned, environmentally pristine walking neighborhood/community.

We are submitting our questions to the City Planning Board in the above two attachments.

Thank you,
Judy and Dick McEntyre

May 30, 2017

Letter to: PlanningCEQA@sandiego.gov

From: Judith and Richard McEntyre (owners)
2633 Aperture Circle, San Diego, CA 92108 (Frame and Focus development adjacent to Via Alta at Civita)

Re: Reject Serra Mesa Community Plan Amendment Roadway Connection Project
#265605 SCH No. 2012011048

CL-2 | **We voice our strong opposition** to the San Diego City Planning Department plan [recirculated 2016's Draft EIR proposal (Environmental Impact Report)] to develop two streets in our Mission Valley's Civita development, Via Alta Road and Franklin Ridge Road, both of which are presently 2-lane residential streets, to serve as a primary freeway connector to the I-805, thereby slicing the wonderful Civita development completely into three (3) pieces, destroying the entire, well-developed, well-planned, environmentally pristine walking neighborhood/community.

PLEASE ADDRESS OUR CONCERNS BELOW.

CL-3 | **1--How current are your traffic volume surveys, how did you predict traffic volume on each road (Via Alta and Franklin Ridge Road), and do your statistics/evaluation show hour by hour traffic?**

CL-4 | **2--How can you predict and declare that this hugely increased traffic will not be a "significant" environmental noise and pollution detrimental change for the whole Civita community and, for instance, particularly for the west-side developments of Altana, Origen, Lucent I, Lucent II, Frame and Focus, and Apex? (See #3 below.)**

We would be highly and dangerously impacted—noise, safety, and health! Your second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled, projecting **34,117 ADT** (Average Daily Trips) of regional traffic through Civita's residential district. Via Alta presently only has 100 – 200 ADT per day!

CL-5 | **3--What traffic statistics have you presently taken of Via Alta, for instance, (which is mostly built up now) and did you use these current statistics as a base for determining the traffic increase if Via Alta is changed into a freeway connector? Do you realize how little traffic we presently have?**

We would be highly and dangerously impacted—noise, safety, and health! In reality, Dick/my one weekday hour by hour informal traffic count of vehicle traffic (not counting construction vehicles) going past our home, (which is located—whole length of our home and patio-- **about 8 feet from Via Alta road**), is as follows:

Highest hourly count was **22 cars** from 7 – 8 a.m.

Second highest hourly count was **15 cars** from 6 – 7 a.m.

Third highest hourly count was **12 cars** from 3 – 4 p.m.

The **seven hours** 11 p.m. to 6 a.m. had a total of only **12 cars** (no more than 3 cars per hour and no cars 2-3 a.m. and 3-4 a.m.)

At most, the ADT is presently somewhere between 150 ADT – 200 ADT/day.

CL-5
cont.

IT IS A RESIDENTIAL STREET! We want to keep it that way. We believe in the pleasant, quiet, peaceful, well-developed, well-planned, environmentally pristine walking neighborhood/community that Civita promised and now provides. No noise. Good safety. Good health.

CL-6

4—Therefore, how can your report say that there is no “significant” environmental/air and noise pollution hazards if Via Alta, for instance, is changed into a freeway connector?

We would be dangerously and highly impacted—noise, safety, and health! Our #3 statistics above, while informal and a small sample, does accurately reflect the typical day we have here on Via Alta. **IT IS A RESIDENTIAL STREET!** And we want to keep it that way—what is the ADT on the residential street where you live? We believe in the pleasant, quiet, peaceful well-developed, well-planned, environmentally pristine walking neighborhood/community that Civita promised and now provides.

It shows that a Via Alta connector could hugely increase our traffic from 150/200 ADT per day to a fourth (8,529 ADT/day) or half (17,000) of your predicted 34,117 ADT (total of Via Alta and Franklin Ridge).

This will increase SIGNIFICANTLY our environmental/air pollution hazards from the gas/oil vehicle fumes of traffic, as well as noise pollution. Health studies show the health dangers of living so close to constant traffic along freeways (and therefore freeway connectors). **Do you have health studies showing otherwise?**

CL-7

5—What are you proposing to do to ensure pedestrian safety for Via Alta walkers, strollers, runners, dog walkers, bike riders, etc., AND for the general San Diego public using our Civita Park and Civita Dog Park, AND for the planned elementary school (corner of Via Alta and Civita Blvd.) if Via Alta (and Franklin Ridge) become a freeway connector?

We would be dangerously and highly impacted—noise, safety, and health! We are a walkable community and Civita is promoted as such. The sidewalks line Via Alta and are heavily used. **Our home is just 3 feet from these sidewalks.**

The permanent Civita dog park has just opened and is located at the top of the hill on Via Alta—a huge number of families (and other San Diegans) walk their dogs morning and afternoon/evening up to and down from that dog park.

Our new beautiful Civita Park (available to all of San Diegans) has just opened—right in the middle of the Civita development which your plan would slice on both sides by Via Alta and Franklin Ridge Road, endangering the public and the planned elementary school population, as well as Civita residents, to constant road crossing and all the issues of heavy traffic! **Have you visited Civita yet to see the entire development, Park, dog park, lovely homes, etc.? Who would want to live in a small community sliced into three parts by two heavily trafficked freeway connectors???**

Our new beautiful Civita Recreational Center/Pool will be opening mid-July. It is at the north end of Civita Park, again right in the middle of the Civita development which your plan would slice on both sides by Via Alta and Franklin Ridge Road, **endangering us all** as we try to

CL-7
cont.

traverse Via Alta, for instance, by way of the Park connecting stairs and/or the Park paths.

Examples of safety issues: all pedestrians/school children/animals wishing to cross back and forth over Via Alta to access their lovely home, their delightful dog park, the outstanding public Civita Park, the new inviting Civita Recreation Center/pool, their school, etc., would have to do so navigating Via Alta without any planned stop signs or traffic lights, no safety road bumps, and limited short left-turn traffic lanes-- in and out and through your predicted traffic 34,117 ADT/day. (That's seriously called "taking your life in your own hands.") They would also have to deal with the **noise and air pollution** of those 34,117 ADT vehicles.

CL-8

6—Should Via Alta and Franklin Ridge Road become freeway connectors, what are your plans to mitigate the huge increase in noise pollution to the thousands of Civita owners dwelling in the 4,500 Civita homes, caused by the 34,117 ADT vehicles/day you foresee slicing through Civita to get on I-805? (Remember, we presently only have an ADT count of 150 – 200 trips per 24-hours on Via Alta!)

We would be dangerously and highly impacted—noise, safety, and health! Would you be planning to provide our homes with noise barriers, or replacing windows to triple pane windows, or heavy bush plantings, or adding some helpful building insulation—such as is done along freeways for adjacent homeowners? Would you be providing funds for such noise abatement at the planned public school at the corners of Via Alta and Civita Blvd.? Noise abatement is important to sleep and good health.

CL-9

7--What facts make you, the City Planning Board, think that Civita (an urban, high density project which you at one time thought was a wonderful urban development and gave your stamp of approval to develop), now needs to "give up" and submit to your new goals/visions/approval--turning Civita into a divided hodgepodge sliced into thirds and highlighted for the main purpose of connecting vehicles to a freeway?

We would be dangerously and highly impacted—noise, safety, and health! This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe, walkable, dense urban village, and a conduit for freeway traffic at the same time. If Civita is forced to be both, at what cost? ...At the degradation of Civita, an Urban Land Institute award winning, planned, walkable village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality. **Are you aware of a poll of Civita home owners in which 95% of them are against the freeway connector?**

Civita owners are tasked with paying for the new Civita Park that is open to the public. The Civita maintenance assessment district is funded by annual charges of about \$200 to \$300 per housing unit. This adds up to \$600,000 in operational and maintenance Civita Park cost, with the City adding only a small percentage of (\$60,000 per year).

And in another blow, a freeway connector would lower home values and create instability in the Civita housing market. This would put a greater burden on the owners who must pay for the public park. We home owners are happy to help pay for and share our outstanding Park with the public, but NOT our residential roads (Via Alta and Franklin Ridge Road)!

CL-9
cont.

Again, we believe in the pleasant, quiet, peaceful well-developed, well-planned, environmentally pristine walking neighborhood/community that Civita promised and now provides, including the residential roads of Via Alta and Franklin Ridge Road. **No noise. Good safety. Good health.**

8--What other I-805 connector options, instead of Via Alta and Franklin Ridge Road, have you worked on/developed?

We would be dangerously and highly impacted—noise, safety, and health! Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.

The high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents. If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, **why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?**

CL-10

GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area. Easy ingress/ egress to Civita in multiple directions will increase the crime rate.

There are other improvements already approved for Mission Valley that will ease traffic congestion. The intersection of 163 and Friars Road is schedule to be completely reconfigured to function better. There are other options to improve traffic flow in Mission Valley without having to destroy a neighborhood to do it.

Please stop pushing outdated planning concepts. Where does it end, when does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution?

Please put the time and energy into improving and adding more mass transit in and through Mission Valley. Make it harder to use a car. Make it easier to use alternative forms of transportation. Whatever the City does, **DO NOT ruin a neighborhood in the process.**

Thank you for your time and thought.
Sincerely,

Dick and Judy McEntyre
2633 Aperture Circle
San Diego, CA 92108
619-224-0825

**Technical Comments and Questions about the Draft EIR for the Serra Mesa
Community Plan Amendment Street Connection:**

— (For use by Judy McEntyre to City Planning Board 5/30/17—questions to be answered)

CL-11

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high- volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.

- a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?
- b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:

- Potential new public transit corridors to reduce vehicles;
- Potential new Riverwalk trolley station and relocated trolley station at Mission;
- Valley Center to increase ridership;
- Potential new skyways to UCSD and University Heights;
- Planned and potential new walking multi-use paths;
- Planned and potential new cycling paths;
- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

CL-11
cont.

Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- Easy vehicular ingress/ egress in multiple directions increases crime rates;
- Proposed regional traffic impacts residential neighborhoods;
- Proposed regional traffic negatively impacts property values;
- Proposed regional traffic impacts tranquility, peace and quiet;
- Proposed regional traffic impacts nature, air quality and biology;
- The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
- Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
- Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should

be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).

7. *"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:*

CL-11
cont.

1. Whether police and fire response times would be improved with the road connection. 2. Whether the road connection could serve as an emergency evacuation route. 3. Whether it is feasible to make the road available for emergency access only. 4. Whether pedestrian and bicycle access would be improved by the street connection."

- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?
- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

Communication sent to Judy McEntyre
2633 Aperture Circle
San Diego, CA 92108
619-224-0825

Letter CL: Judy and Dick McEntyre

CL-1: The commenters state opposition to the plan to develop two streets in Civita, Via Alta Road and Franklin Ridge Road, into a primary freeway connector to I-805, which would divide Civita.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. However, the development of Via Alta Road and Franklin Ridge Road into a freeway connector is an incorrect description of the proposed project. The proposed project as analyzed in the DEIR consists of construction and operation of a four-lane major street, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta/Franklin Ridge Road in Mission Valley. Specific responses to the commenter's specific comments follow below in comments CL-3 through CL-11.

CL-2: This comment is verbatim what is stated in comment CL-1 above. Please see the response to comment CL-1.

CL-3: The commenters ask how current the traffic volume surveys are, how traffic volume was predicted on each road, and if hour by hour traffic was evaluated.

Please see the responses to comments G-61 and G-62, as well as Appendix C of the DEIR for a detailed description of the traffic study methodology.

CL-4: The commenters question how it can be predicted and declared that the increase in traffic will not be a significant environmental noise and pollution detrimental change for the whole Civita community.

This comment raises concerns related to noise and pollution as a result of the proposed project. The environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.3, *Air Quality*, 5.4, *Noise*, and 5.8, *Hydrology and Water Quality*, of the DEIR. With the implementation of mitigation measures to address construction noise levels, the proposed project would result in less than significant impacts related to noise during project construction. No mitigation or noise abatement measures are required to address potential traffic-related/operational noise as no significant impacts were identified in the DEIR. Potential impacts were determined to be less than significant related to air quality and hydrology and water quality. No changes to the FEIR are required as a result of this comment.

CL-5: The commenters question what traffic statistics have been presently taken of Via Alta and were they used as a base for determining the traffic increase if Via Alta is changed into a freeway connector.

Please see the responses to comments G-61 and G-62, as well as Appendix C of the DEIR for a detailed description of the traffic study methodology and assumptions. Please also see Section 5.2, *Transportation and Circulation*, of the DEIR for analysis regarding transportation impacts to Via Alta. As detailed in Section 5.2, the proposed project would not result in any significant impacts along Via Alta.

CL-6: The commenters express disagreement with the lack of significant impacts to environmental/air and noise pollution hazards in the DEIR with respect to Via Alta and question if

there are “health studies showing otherwise” with respect to health dangers of living so close to constant traffic along a freeway (and freeway connectors).

Please see the responses to comment G-129 through G-134. The Air Quality Monitoring and Noise Assessment included as Appendices D and E, respectively, of the DEIR, support the conclusions for less than significant impacts to both air quality and noise as analyzed in the DEIR.

CL-7: The commenters question what is proposed to ensure pedestrian safety along Via Alta and for those using the park, dog park, and planned elementary school once Via Alta becomes a freeway connector.

Please see the responses to comments F-4 and F-5.

CL-8: The commenter question what the plans are to mitigate the “huge increase in noise pollution” to Civita homeowners, including noise barriers, replacement triple pane windows, and other insulation, and if funds would be provided for noise abatement at the planned school.

This comment raises concerns related to noise abatement to Civita residents as a result of the proposed project. The environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Section 5.4, *Noise*, of the DEIR. With the implementation of mitigation measures to address construction noise levels, the proposed project would result in less than significant impacts related to noise during project construction. Because the proposed project would result in less than significant impacts during project operation, no mitigation or noise abatement measures are required. Please see response to comment F-4 regarding the siting of the potential future school in Civita. No changes to the FEIR are warranted as a result of this comment.

CL-9: The commenters provide several reasons for opposition to the proposed project, including a Civita homeowner poll, park assessments, and lowered home values.

Please see the response to comment F-2. The commenters’ concerns regarding decreased property values are broad statements and are not issues that are under the domain of CEQA unless it is attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

CL-10: The commenters question what other I-805 connector options have been developed, and repeats numerous comments and questions verbatim with what are included in Save Civita (Comment Letter F).

Please see Chapter 9, Alternatives, of the DEIR. It should also be noted that the proposed roadway connection is not a “freeway connector,” but rather provides a connection between the Serra Mesa and Mission Valley communities. Alternative options for providing freeway ramp access were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. No changes to the FEIR are required.

Please also see the responses to comments F-2 through F-11.

From: Matt Shirley <mattcanfixit@gmail.com>
Sent: Tuesday, May 30, 2017 1:55 PM
To: PLN_PlanningCEQA
Subject: Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project -
Project No. 265605

Dear Sir or Madam,

CM-1

Please do not build the proposed Franklin Ridge Road and ruin my community. The latest DEIR has too many errors and omissions for it to be a reliable document to make your decision with. I live directly behind where the proposed road will go, which the DEIR indicates will add UP TO 40 MINUTES to my commute where there is currently no wait time. Currently we get one or two lost cars speeding in and out of the dead end cul-de-sac where my kids play, but if the road goes in we expect TEN TIMES more traffic, and more direct danger to my family. This community does not want 40,000 cars a year added to its roads, and neither do the Civita and Mission Valley residents who will live on that road. With the advent of GPS routing, traditional traffic analysis does not accurately forecast conditions, because these can change on the fly with directions from Google. Do not do this to us. We chose this community because of its relative seclusion and thus safety. Do not mess this up!

Please do not cut us off from our only connection to greater San Diego with a four lane road and 40,000 cars a year.
Please do not bisect Western Serra Mesa's only park with a major, four lane road.
Please do not pump traffic through a community that has remained unchanged since it was built in 1961.
Please do not remove the only bike lanes in and out of our community.

Sincerely,

Matt Shirley
2271 Salisbury Dr.
San Diego, CA 92123
(619) 994-8429

Letter CM: Matt Shirley

CM-1: The commenter expresses opposition to the proposed roadway connection and general concerns regarding additional traffic and congestion, child and pedestrian safety, bisecting the park with a four lane road, and removing bike lanes in and out of the community. The commenter expresses opinion that the latest DEIR has “too many errors and omissions” for it to be a reliable decision-making document.

Please see the response to comment F-2. The comment raises general concerns related to traffic and congestion and pedestrian safety, but does not specifically raise issue regarding the adequacy of the DEIR. The comment does not identify any specific errors and omissions within the DEIR. Please see response to F-4 and F-5, which indicates that the street, intersections, and other facilities would be designed in accordance with the City of San Diego’s Street Design Manual (2002). Please also see Section 5.2, *Transportation and Circulation*, of the DEIR for the impact determinations on traffic and mitigation including bike lane removal that is unlikely to occur, and Comment AE-1 for a summary of the significant and unavoidable traffic impacts.

While the proposed project would somewhat divide western Serra Mesa’s only park (Phyllis Place Park) by placing a roadway in between the two portions of it, this would not represent a significant impact on the environment, as the proposed project would not result in hazards to pedestrians/park users. The roadway itself would be designed in accordance with applicable City regulations, including the Street Design Manual (City of San Diego 2002) and the intersection at Phyllis Place would be signalized and would include a signalized pedestrian crossing. No changes to the FEIR are warranted as a result of this comment.

From: gabriela surpi <gabriela_surpi@yahoo.com>
Sent: Tuesday, May 30, 2017 12:56 AM
To: PLN_PlanningCEQA; Morrison, Susan
Subject: Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project,
Project No. 265605
Attachments: RE_Serra_Mesa_Plan_Amendment_GSurpi_ProjectNo265605_May30.pdf

Dear Susan Morrison,

CN-1 | Please find attached my comments on the Recirculated DEIR for Project 265605: Serra Mesa Community Plan Amendment Roadway Connection Project.

Sincerely,

Gabriela Surpi

May 30, 2017

RE: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No 265605

Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

CN-2

Below is a list of questions related to the accuracy and completeness of the current RDEIR. In summary I find that many of the studies provided in this Recirculated DEIR (RDEIR) are not rigorous, and the overall report lacks coherence and often presents contradictory content. There is information missing and also some that is incorrect, but the errors seem always biased toward supporting the development of the project it proposes which erodes the overall credibility of the report.

The connector idea was initiated many years ago mainly in the spirit of providing emergency, pedestrian and bicycle access. Over time those needs were fulfilled by another road nearby and, instead of being cancelled, the project got repurposed by this RDEIR as a much larger initiative to build a freeway connector from Mission Valley to I805 at Phyllis/Murray in Serra Mesa. The connector would direct non local traffic through residential areas that would then get congested, disrupted and polluted as they were not designed to accommodate the increased number of new trips. The RDEIR attempts to further justify the project by adding as objective the alleviation of the traffic congestion it will actually create, which is very unprofessional.

Thank you in advance for the consideration of the items I list below.

RDEIR = Recirculated Draft Environmental Impact Report

OBJECTIVES, ALTERNATIVE PLANS AND SUPERIOR ALTERNATIVE

Inaccurate, contradictory and out of scope Project Description and Objectives

CN-3

The General Plan and Community Plan Amendment Manual states that *'To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.'*

The RDEIR Project Description and Objectives do not follow the direction given by the Resolution Number 304297, dated Oct 21 2008 that motivated this environmental report study.

CN-4

According to resolution 304297 the Council of the City of San Diego *'Initiates the amendment of the Serra Mesa Community Plan and General Plan to include the street connection between Phyllis Place and Frias Road'* and instructs staff to analyze the following issues in relation to the aforementioned connection:

- 1. Whether police and fire response times would be improved with the road connection*
- 2. Whether the road connection could server as an emergency evacuation route*

3. *Whether it is feasible to make the road available for emergency access only*
4. *Whether pedestrian and bicycle access would be improved by the road connection*

CN-4
cont.

On RDEIR in relation to Resolution 304297:

Why does the RDEIR fail to mention that since the City Resolution 304297 from 2008, further development has been taken place in the area and the road connection is no longer necessary for emergency, pedestrian and bicycle access as Kaplan Drive, only 1200 feet away from the proposed road connection, now provides emergency, pedestrian and bicycle access?

CN-5

Why doesn't the RDEIR focus on the study of 4 points instructed by the City on Resolution 304297 that motivated its creation? Is the RDEIR a legal report to be used for Resolution 304297?

Can the authors of this RDEIR change the scope, add and study new objectives not included in the project initiated by Resolution 304297?

CN-6

How is that resolution 304297 from 2008 just mentioning a road connection that should be evaluated in relation to police and fire response, emergency evacuation, pedestrian and bicycle access was taken out of scope by City staff in this RDEIR and transformed into a different and broader project? Can you please explain the process that led to the new project description and objectives being used in the RDEIR?

Even if authors could legally study new objectives, why do they introduce objectives 2, 3, 4 and 5 which are already met and not necessary? Isn't this confusing and misleading?

On RDEIR project description:

CN-7

Why does the RDEIR state '*The proposed project consists of construction and operation of a four-lane major street*'? How was it determined from Resolution 304297 that the project should require a four-lane major street to meet any goal intended in that resolution?

On RDEIR objectives:

CN-8

Why does the RDEIR, after comments received on first draft, still insist on including project objectives 4 and 5 with '*Improve emergency access and evacuation*' and '*Provide a safe and efficient street design for motorist, cyclists, and pedestrians that minimizes environmental and neighborhood impacts*' when those objectives are already met by existing bike lanes in the area, Kaplan Drive access and existing roads?

CN-9

Why does the RDEIR, after comments received on first draft, still insist on including objective 2 '*Improve local mobility in the Serra Mesa and Mission Valley planning areas.*' when that objective is already met and good local mobility between both communities exists via Mission Center Road and Mission Village Drive?

CN-10

Why does the RDEIR include objective 3 '*Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.*'? Where does this objective come from? If it were to be applicable, can you complete its description by

CN-10
cont. | clarifying to what freeway on-ramp and off-ramp does it refer to, and what are the limits of the surrounding areas it mentions?

CN-11 | If objective 3 '*Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.*' refers to access to the nearby I805 freeway on-ramps and off-ramps at Phyllis/Murray, why would alleviation be needed if there is currently not congestion in those ramps (Table 5.2-6. Ramp Meters: Existing Conditions shows Delay of 0 minutes in all ramps)?

CN-12 | The road connection project initiated in Resolution 304297 was aimed at improving *police and fire response, emergency access, and pedestrian and bicycle access* in the area. In this RDEIR the project scope was changed and augmented such that the project now consists of a four-lane major street that will funnel non local and commercial traffic through residential neighborhoods in Mission Valley (Civita) and Serra Mesa (Abbotshills) towards the I805 freeway on-ramps and off-ramps at Phyllis/Murray in Serra Mesa generating significant and unavoidable congestion in the area according to the traffic analysis included in the RDEIR. Since it is the development of the new scoped project what would generate new traffic and congestion, isn't it inaccurate and unethical to claim one of the project objectives (number 3) is to alleviate the traffic and congestion in Serra Mesa the project itself will be creating?

Inconsistent argument: mitigations included in RDEIR are bigger in scope than the project itself and don't eliminate the negative impact in Traffic/Circulation

CN-13 | The project by itself is a new 460 feet long connection between Phyllis Place in Serra Mesa and the convergence of Via Alta and Franklin Ridge Road in Mission Valley. The connection is proposed by the RDEIR as a four-lane major street that would function as a freeway connector funneling non local traffic to the area and creating congestion. Table ES-1 proposes short term (2017) traffic mitigations for the congestion that include among other the conversion of 6400 feet (or 1.2 miles) of existing two-lane roads and a freeway bridge overpass into a four-lane Collector or a five-lane Major Arterial (see MM-TRF-1, 2, 3 and 4). The overall mitigations are at least 10 times larger in scope than the 460 feet long connection. The RDEIR also states that the '*project would result in significant and unavoidable direct impacts after mitigation related to the topic areas of transportation/circulation (roadway network capacity, planned transportation systems, and traffic hazards).* Based on the analysis provided in Chapter 5, the proposed project would result in significant and unavoidable cumulative impacts related to transportation/circulation.'

CN-14 | Can you please explain how is it consistent and coherent as an argument that the RDEIR proposes mitigations that are larger than the project itself and in the end do not mitigate the project impacts?

Doesn't the larger scope of the mitigations, compared to the proposed project, disqualify them as only 'mitigations'?

Since the mitigations by themselves are a larger initiative than the road connection, shouldn't they be included as part of the project description and their environmental impact also be studied?

CN-15 | If mitigations are to be considered, can you add an environmental study of their impact?

Project description and mitigations proposed in RDEIR contradict Senate Bill No. 743

CN-16 | Governor Brown signed Senate Bill (SB) 743 (Steinberg, 2013), which creates a process to change the way that transportation impact is analyzed under CEQA. SB 743 requires amending the CEQA Guidelines to provide alternatives to LOS for evaluating transportation impacts that *'promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.'* Measurements of transportation impacts may include *'vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.'*

The California's Governor's Office of Planning and Research in the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (8/6/2014) states that *'Ironically, even congestion relief projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term, they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions (Matute and Pincetl, Use of Performance Measures that Prioritize Automobiles over Other Modes in Congested Areas).'*

The RDEIR project and short term (2017) mitigations proposed include:

- a new four-lane major street connector
- the widening of an existing two-lane street into five-lane Major Arterial (Phyllis Place road between new connector and SB I805, see 'MM-TRAF-3')
- the widening of existing two-lane streets into four-lane Collectors (Murray Ridge and Phyllis Place bridge over I805, see 'MM-TRAF-1', 'MM-TRAF-2' and 'MM-TRAF- 4')
- the widening of existing I805 NB and SB on-ramps at Phyllis Place, see 'MM-TRAF-5' and 'MM-TRAF-6')
- the widening of multiple road approaches at an existing intersection (Qualcomm Way and Frias Road, see MM-TRAF-7')

CN-17 | Additionally, in the long term, mitigations MM-TRAF-8 through MM-TRAF-19 including further road widening will also be needed.

Since the proposed project and mitigations will encourage new automobile trips to be generated in the new road and in the new lanes to be added to existing roads, increasing VMT instead of promoting the use of public transit, can you complete the RDEIR by explaining why they are still being considered even when they contradict Senate Bill No. 743?

Since the proposed project and mitigations do not provide a sustainable solution to the traffic issues and congestion currently suffered by Mission Valley and additionally create new traffic issues and congestion in Serra Mesa, can you complete the RDEIR by explaining why are they being considered and what is the advantage they provide to the area?

The Alternative Plans are incomplete and miss relevant alternatives

CN-18 | The project studied in this RDEIR was originally initiated in 2004, since then the City Council has already denied it by vote on March 15, 2005; and furthermore objectives 2, 4, and 5 proposed in

CN-18
cont. | the current RDEIR are already accomplished by existing bike lanes, the Kaplan Drive connection Mission Center Road and Mission Village Drive (as discussed in letter section 'Inaccurate, contradictory and out of scope Project Description and Objectives' above).

CN-19 | On objective 1 '*Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.*'

Can you include and evaluate the Alternative Plan of modifying the Mission Valley Community Plan to exclude the proposed connection from Mission Valley to Phyllis Place in Serra Mesa so that the inconsistency between both community plans is resolved?

CN-20 | On objective 3 '*Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.*' This objective is already accomplished in the Serra Mesa area, so objective could only be interpreted as applicable to Mission Valley as that area needs traffic alleviation, more efficient local freeway on- and off-ramps, and the development of multimodal transportation that can satisfy the mobility demand of the higher density areas Mission Valley is currently developing and plans to develop in the future.

Can you add and evaluate Alternatives Plans to achieve better network connection, improved freeway access and multimodal transportation for Mission Valley within the boundaries of Mission Valley?

The discussion on superior Alternative has contradictions

CN-21 | The RDEIR states that '*the project would result in significant and unavoidable direct impacts after mitigation related to the topic areas of transportation/circulation*' and '*significant and unavoidable cumulative impacts related to transportation/circulation*', and '*the No-Project Alternative is identified as the environmentally superior alternative*' and '*the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior build alternative*'.

Then the RDEIR seems to contradict itself, as if edited by a different source trying to arrive to a different conclusion, and says that '*both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region.*'

Can you explain why Alternatives 1 and 2, which are extensively demonstrated to be environmentally superior alternatives, should be doubted?

CN-22 | As stated above in this letter (sections 'Inaccurate, contradictory and out of scope Project Description and Objectives' and 'Project description and mitigations proposed in RDEIR contradict Senate Bill No. 743') the traffic congestion to be created in the area is consequence of the implementation of the project proposed by this RDEIR, it is the four-lane new connector funneling non local and commercial traffic that will promote and create additional automobile trips, increasing VMT and congesting the area.

CN-23

For Mission Valley residents trying to travel south, going first north from Frias Road to Phyllis Place to then enter I805 SB and go back south significantly increases VMT compared to the existing alternative of approaching I805 SB from I8.

For Mission Valley residents trying to travel north they have already two options, either taking I163 NB or I15 NB from Frias Road, or taking I805 NB from I8.

Are you proposing that the creation of a new road connector and the widening of nearby existing roads promoting new automobile trips due to induced demand will decrease VMT? Are you saying that all existing studies on VMT proving the opposite are wrong?

If Mission Valley is congested, can you propose an alternative solution to that problem that will not generate new automobile trips, increased VMT and increased LOS in Serra Mesa?

TRAFFIC/CIRCULATION

Near-Term 2017 baseline traffic conditions don't follow City guidelines

CN-24

The Traffic Impact Study includes traffic volumes in 3 scenarios: Existing Conditions 2013, Near-Term 2017, and Long-Term 2035. Study uses the comparison of Near-Term Baseline with no project and Near-Term with Project to identify significant traffic impact. So the measures used as Near-Term Baseline are critical to determine possible traffic impact.

While the 2013 Existing Conditions were obtained through machine data collected on the field in 2011 and 2013 (Appendix C, 2015 Traffic Impact Study, Chapter 3, Section Existing Traffic Volumes), the 2017 Near-Term conditions were estimated.

The San Diego Traffic Impact Study Manual

(<https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/industry/trafficimpact.pdf>) states that 'The count data used in traffic impact studies should be no more than two years old. If recent traffic data is not available from the City, current counts must be made by the consultant.'

Why didn't the traffic study follow City guidelines and collect current count, instead of using a model to estimate the existing conditions (Near-Term 2017 Baseline) from data collected almost 4 years ago or older?

CN-25

The RDEIR says that the Near-Term 2017 baseline estimation was done with a SANDAG computerized travel forecast model. City Staff also accounted for projects not accounted for in the model, and in cases where the model performance was poor the results were adjusted (Appendix C, 2015 Traffic Impact Study, Chapter 4, Section Traffic Impact).

Why should any results of this model be trusted if the model already showed obvious poor performance in some predictions that required post-model adjustments? How can one affirm that the model predictions that are not obviously wrong are actually accurate?

CN-26

Why is the model used and adjustments done not clearly explained? What known and proposed development projects were accounted by the model and how? What known and proposed

CN-26
cont. | development projects not accounted by the model were accounted by City Staff and how? What specific model predictions were poor and were adjusted?

Near-Term 2017 baseline traffic conditions likely inaccurate

CN-27 | The RDEIR says 'it is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented'
There are multiple major developments planned for the area (e.g. "Town and Country", "Riverwalk", "Camino del Rio (Bob Bajer Site)", "Union-Tribune" and "Hazard Center") that can significantly impact the amount of traffic in Mission Valley, how can the report estimate a baseline into the future when traffic conditions are rapidly changing and authors don't know when the road would be built?

Untrustworthy traffic study lacking authorship included in Appendix H

CN-28 | Besides the LOS traffic study in Appendix C by Chen Ryan, the RDEIR now includes a second traffic study on Appendix H titled '*Vehicle Miles Traveled Output and Summary*'. The study lacks authorship, lacks description of the specific assumptions and methods used, and looks unprofessional as if put together in a rush to not miss a deadline. Following suit with its unreliable presentation, its main claim is completely absurd: a reduction of -0.32% VMT calculated as the difference between the estimated VMT With Project and Without Project. Why is this claim absurd? Because the estimated VMT With Project and Without Project in 2017 (1,523,630 and 1,518,696 respectively) are exactly that, estimations, and as such they carry also an estimated margin of error that needs to be taken into account. If such estimations have even a minuscule margin of error of 0.16% then the prediction claimed is invalid. With a forecast model being used to estimate each of these predictions, an error as small as 0.16% is impossible, so the reduction of VMT claimed is invalid.
For example if $C = A - B$ and we estimate $A = 1000 \pm 10$ and $B = 1001 \pm 10$ then C could be anything between -21 and 19 and claiming that $C = -1$ is invalid.

CN-29 | How is possible that a traffic study with no authorship and lacking of any scientific rigorous has been included in the RDEIR? How can we trust the veracity of the rest of the information provided in the RDEIR knowing at least in this case no proper quality control was made?

Who are the authors of Appendix H? Have they generated any other content used in the report?

Traffic Study combining two different criteria is inaccurate

CN-30 | The RDEIR includes two traffic studies using different criteria, one uses LOS (Appendix C) and the other VMT (Appendix H). Furthermore, it states '*The Near-Term scenario compares the Year 2017 roadway, intersection, and freeway facility conditions with the addition of the proposed project. Potential significant direct impacts on roadway facilities are analyzed in terms of changes in V/C ratio, average delay, and LOS in accordance with the City's thresholds outlined in Table 5.2-9 above and VMT for Caltrans' freeway facilities, in accordance with recent guidance published by Caltrans.*'

CN-31

Again it looks like the DEIR had a study on LOS, and the new RDEIR added last minute a different study on VMT and then tried to conclude from both at the same time. These two metrics, LOS and VMT, are not compatible and cannot be used simultaneously to plan urban design and make conclusions on a project's impact. VMT is proposed to replace LOS, not to be used in conjunction. How can a combined traffic study using simultaneously two incompatible metrics as criteria make any sense and be reliable? Why should we trust the results of a study using both LOS and VMT?

Inaccurate LOS in Table 5.2.10 should use PHV instead of ADT

CN-32

While the City's Traffic Impact Study Manual (1998) presents Table 5.2-2 to classify LOS based on ADT (average daily traffic) it states that this table *'is intended as a general planning guideline' and 'levels of service are not applied to residential streets'*. The Manual also states that LOS should *'evaluate traffic operating conditions of the transportation system', 'This is a qualitative assessment of the quantitative effect of factors such as speed, volume of traffic, geometric features, traffic interruptions, delays and freedom to maneuver' and 'the traditional morning and afternoon peak hour of the street system should be evaluated in each impact study' and 'the time periods that provide the highest cumulative directional traffic demands should be used to assess the impact of site traffic'.*

While in this RDEIR peak hours and directional traffic were accounted in freeways to estimate PHV (peak hour volume) and calculates LOS as PHV/capacity, the roadways, intersections and ramps used ADT/capacity as the estimation for LOS and then significantly underestimate the congestion those areas will suffer with the project.

Since PHV is recognized as a more accurate measurement to estimate traffic operating conditions and traffic impact, can you add to the DEIR the LOS of all roadways, intersections and ramps using this metric instead of ADT and adjust conclusions accordingly?

Inaccurate LOS in Table 5.2.10

CN-33

Phyllis PI between Abbotshill Rd and Franklin Ridge Rd shows LOS A in the Near-Term With Project but it should be F. Residents leaving Abbotshill Area will drive this segment and meet the next segment (Phyllis PI between Franklin Ridge Rd and I-805 SB ramp) that has LOS F. With the next segment being congested cars will start lining up west on Phyllis PI back into Abbotshill Area so Phyllis PI between Abbotshill Rd and Franklin Ridge Rd will effectively have LOS F, as well as other streets in Abbotshill Area. Since Phyllis PI is the only road to exit the Abbottshill Area this creates a significant traffic hazard for that neighborhood.

Can you adjust the LOS of Phyllis PI between Abbotshill Rd and Franklin Ridge Rd to show the actual expected level of service F?

CN-34

LOS is an index used to quantitatively evaluate the operational quality of the roadway segments and is impacted by many factors. While LOS can be estimated as V/C in some cases, in others V/C can significantly underestimate congestion if the effect of nearby segments having congestion, bottle-necks, queuing etc. is not accounted properly. How many more LOS calculated as V/C and provided in the tables disregard the impact of adjacent segments and have their level of congestion also underestimated? Can you correct them?

CN-35

Can you address the impact on safety and delay on emergency response for Abbotshill Area residents due to the congestion the project will create at Phyllis Pl?

LAND USE

Contradictory information is provided on land use where the project would take place

CN-36

The Phyllis Place Park, a 1.33 acres neighborhood park for Serra Mesa, has been approved to be constructed south of Phyllis Place in the same location of the project, which would define the land use as **Park**.

However the RDEIR provides land use according to the General Plan Land Use Designation in Figure 5.1-1 which describes the project area as a combination of **Residential** and **Multiple Use**.

CN-37

Furthermore, according to the current Serra Mesa Community Plan <https://www.sandiego.gov/planning/community/profiles/serramesa> provided in this Public Notice (Internal Order Number 11002155 on 3/29/17) the area where the project would take place is designated as **Open Space** as seen in Figure 14 of such plan.

Note however that 2 dimensional maps largely fail to properly describe the land area in question located south of Phyllis Place, the picture below gives a better idea of what it looks like:

CN-38



CN-39

This land provides unique scenic views of Mission Valley from Serra Mesa, giving *visual and psychological relief from the dreadful tedium and tension of interminable urban development*. These ingredients are exactly what is defined as *Open Space in both the SMCP and the General Plan*. The land is only in proximity of low density residential housing and low speed neighborhood streets, providing a quiet, safe and peaceful environment to develop the Phyllis Place Neighborhood Park so wanted by the community.

CN-40

How is possible that the area of the project has currently three different designations (park, residential/multiple use, and open space) in different City documents?

Given the location of the land, its unique scenic views of Mission Valley from Serra Mesa, and the quiet residential character of its surroundings, it is clear the land would provide its best potential to residents if converted into the already approved park. Can you please explain how is possible that the RDEIR still claims the land's better use is to be converted into a four-lane Collector (Franklin Ridge connector), adjacent to a new five-lane Major Arterial (Phyllis Place), and this would not have significant impact on land use?

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

RDEIR is inaccurate when determines there is no impact on visual quality

CN-41

The RDEIR is inaccurate and contradicts City's Significance Determination Thresholds (City of San Diego 2011b) on visual quality impacts which indicate impact may be significant if (i) *'The project would create a disorganized appearance'* or (ii) *'The project is large and would result in an exceedingly monotonous visual environment.'*

The RDEIR statement that the visual impact is less than significant is inaccurate according to the City's Significance Determination Thresholds (City of San Diego 2011b) as the project will build a four-lane road in the middle of the Phyllis Place Park (SDG PROJECT #: 12-411, June 6, 2013) and create a disorganized appearance of such park, with an exceedingly monotonous visual exposure to a four lane traffic circulation, can you correct the RDEIR to properly asses the visual impact as significant according to the City's Significance Determination Thresholds (City of San Diego 2011b)?

CN-42

Given that the project would replace unparallel scenic views of Mission Valley from a natural and quiet environment in Serra Mesa with views of a four-lane traffic road carrying noise and pollution, and from which the observer's point has been removed (nobody can stand in the road to observe) can you correct the inaccurate conclusion that the project will have less than significant impact on visual quality?

CN-43

RDEIR is inaccurate when determines there is no impact on neighborhood character, according to the City of San Diego criteria there will be impact on neighborhood character

According to the City's Significance Determination Thresholds (City of San Diego 2011b), impacts regarding neighborhood character and compatibility and landform alteration may be significant

if the project would be located in a highly visible area (e.g., on a canyon edge or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projections.

CN-43
cont.

Given the proposed project takes place in a highly visible area sitting on a hill visible from both Mission Valley and Serra Mesa, and the project would strongly contrast with the planned Phyllis Place Park and hillside area by introducing a noisy and polluting four-lane steep road with heavy traffic and bulk traffic lights and traffic signals, the project has significant impact on neighborhood character according to the City's Significance Determination Thresholds (City of San Diego 2011b). Can you correct the inaccurate conclusion that the proposed project will have less than significant impact on neighborhood character?

RDEIR is inaccurate and contradicts the Serra Mesa Community Plan regarding impact on neighborhood character

CN-44

The Serra Mesa Community Plan has as goals to "*retain the residential character of Serra Mesa*", "*to develop sufficient and convenient parks and recreational facilities*" and "*to provide a safe, balanced, efficient transportation system with minimal adverse environmental impact*". The Serra Mesa character of the area surrounding the project is a low density residential area that includes single-family homes and the City View Church, and is navigated by low speed neighborhood roads ending in quiet cul-de-sacs. True to its goals, the Serra Mesa Community provides a safe, balanced and efficient transportation system with minimal adverse environmental impact to its residents, and has also approved the Phyllis Place Park in the area (SDG PROJECT #: 12-411, June 6, 2013).

Can you complete the RDEIR by including a section describing how the project would contradict the goals of the Serra Mesa Community Plan by disrupting the residential character of the area and negatively impacting the construction of the Phyllis Place Park?

NOISE

RDEIR uses inaccurate noise level thresholds for Residential

CN-45

According to City of San Diego Regulations

<http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/NoiseElement.pdf>

"The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL"

"Category A = Residential—single family residences, mobile homes, senior housing, convalescent homes". Same number is used in

<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptednoiseelem.pdf>

And both mention that to go above 60 dB mitigation techniques should be analyzed and incorporated. The 60 dB threshold applies to transportation noise in these documents, however the RDEIR Table 5.4-5 uses 65 dB CNEL instead.

CN-45
cont.

Why is the threshold for noise level used in the RDEIR (65 dB) higher than the one commonly agreed upon in the City Of San Diego (60 dB)? Wouldn't it be the case that for any existing condition at or over 60 dB then an increase by 3 or more dB will be significant?

CN-46

Wouldn't the impact on R11 from Table 5.4-7 be significant due to an increase by 3 or more dB?

CN-47

Can you revisit the RDEIR to evaluate and conclude on the 60 dB threshold adopted by the City of San Diego instead of 65 dB, and if not explain why?

CN-48

RDEIR does not study noise impact on Phyllis Place Park

As the RDEIR mentions, *'the City's Significance Determination Thresholds (2016) define noise-sensitive land uses to include, but not necessarily be limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, parks and recreation facilities, museums, and child care facilities'*. The proposed project would take place where the Phyllis Place Park has already been approved.

Since the traffic noise generated by the four-lane proposed connector and the five-lane MM-TRAF-3 mitigation will be in the middle and adjacent to the already approved Phyllis Place Park, why didn't you study how the noise of the new traffic noise will affect the Phyllis Place Park? Can you include that analysis, and if not explain why?

CN-49

RDEIR Model for Noise impact is incomplete and does not account for several factors impacting noise level

The project will add a new four-lane road generating new, currently non existing, traffic. According to the General Plan

<http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/NoiseElement.pdf>

'There are several key factors associated with roadway or traffic noise, including traffic volumes, the speed of the traffic; the type or "mix" of vehicles using a particular roadway; and pavement conditions.'

According to The Journal of the Acoustical Society of America **61**, 1403 (1977);

<http://dx.doi.org/10.1121/1.381455> sound propagation is affected by *'geometrical spreading, atmospheric absorption, ground effect, (near horizontal propagation in a homogenous atmosphere close to flat ground), refraction, the effect of atmospheric turbulence, and the effect of topography (elevation, hillsides, foliage, etc.)'*

In RDEIR Appendix E containing the Noise Modeling Input and Output files, the following elements were not considered:

- Noise due to motorcycles (explicitly set at 0 in model)
- Wind conditions are not included in model. Is well known that the valley winds come uphill and carry the noise with them, this effect needs to be included in the model as traffic noise north of Phyllis will not decrease with distance from the road as assumed.
- The grade of the road has impact on the noise generated by the traffic, that effects has not been considered in the model
- The road surface type is one of the biggest contributions to traffic noise, not discussion has been included regarding what type of surface was assumed in the model

CN-49 cont. | Why didn't you include the effect of motorcycles, wind conditions, road grade, and surface type in the noise analysis? How can we trust any findings from the noise analysis when it already missed the inclusion of these effects which are widely known to be significant?

CN-50 | Can you add a proper noise study including these and any other significant effects that were originally overlooked?

CN-51 | Will the inclusion of these effects generate significant noise impact?

RDEIR Noise level increases are inconsistent and need to be reviewed and corrected

CN-52 | It is known that two sources of noise with magnitudes X dB and Y dB combine into a noise of magnitude Z dB where $Z > X$, $Z > Y$ and $Z < X+Y$. This is because the dB of different sources is not additive (E.g. 58 dB + 58 dB = 61 dB). A calculator can be found for example at <http://www.sengpielaudio.com/calculator-spl.htm>.

Then from the RDEIR the dB with the road in Table 5.4-7 (predicted traffic noise levels along roadways in the project area under existing, opening day, and long-term conditions both with and without the project):

R5 – Residential adjacent to Phyllis Place will increase from 59 to 60 => the new road added 53 dB

R6 – Church adjacent to Phyllis Place will go from 62 to the same 62 => the new road added 0 dB

A measure of 0 and 53 dB as the noise added by the proposed four-lane major road connector is contradictory.

Can you clarify what the noise added by the road connector to R5 and R6 in Table 5.4-7 is?

CN-53 | Even in the case of assuming the road connector will add 53 dB, that level is significantly underestimated compared to other similar noise sources mentioned in the report. The same table shows that the current noise at roads that already have traffic at least equivalent to what the new road will have, like R9 (Residential adjacent to Mission Center Road north of project) and R10 (Residential adjacent to Phyllis Place east of Interstate 805), are around traffic noise of 68-69 dB.

Can you describe how the noise level to be added by the road connector was calculated?

CN-54 | How is it possible that the new road will add significant new traffic (compared to existing traffic) to R5 and R6, however the noise the new traffic will add (estimated in the RDEIR to be between 0 to 53 dB) is lower than the current traffic noise in those quiet residential areas (currently estimated in the RDEIR to be between 59 and 62 dB)? Can you explain this contradiction?

CN-55 | Also note the discrepancy to the noises added to R3 and R7 that suggest the road connector noise added is 57-59 dB:

CN-55
cont.

R3 – Residential adjacent to Civita Boulevard will increase from 58 to 61 => the new road added 58 dB

R7 – Future residential west of Franklin Ridge Road Extension will increase from 54 to 59 => the new road added 57.4 dB

Can you clarify and include in table 5.4-7 what the noise added by the road connector (in dB) to each R* location is?

CN-56

RDEIR is incomplete when only considers average noise over long time periods to estimate noise impact. The impact of loud short term noise needs to be included

The whole noise study is done by quantifying the road connector impact on average noise. However, it is known that loud short term noise generated by sirens, honking, loud motorcycles, tires slipping with no grip on hard acceleration & braking, high RPM vehicle engines trying to go uphill, etc.

Besides considering average noise, why didn't you include the effect of noise outbursts in the Noise study and determine its impact? Can you add that study to make a complete assessment on noise impact, if not explain why?

AIR QUALITY

CN-57

RDEIR analysis on air quality impact is incomplete and inaccurate

RDEIR says 'There are four zoning designations that apply to the project site, as currently zoned by the City's Municipal Code: RS-1-7, which is for single family residential use (minimum of 5,000-square-foot lots); RM-2-4, which is for medium-density multiple dwelling units (one dwelling unit for each 1,750 square feet of lot area); RM-3-8, which is for medium-density multiple dwelling units (maximum of one dwelling unit for each 1,000 square feet of lot area); and OP-2-1, which is for open space park uses including passive and some active uses (San Diego Municipal Code, Chapter 13). **The proposed project would not conflict with these zoning designations, as it would establish right-of-way for the roadway within these designations, and would not preclude any land from being developed consistent with these designations'.**

How can you state that 'The proposed project would not conflict with these zoning designations, as it would establish right-of-way for the roadway within these designations' when there will traffic lights in both ends of the connector and Phyllis Place will operate at LOS F (Table 5.2-10), both conditions generating queuing and congestion in the connector and not a right-of-way?

CN-58

RDEIR says 'The proposed project would not include trip-generating uses (e.g., residential or commercial units)'

How can you state that the project and needed mitigations will not generate new trips when they will build a new 460 feet four-lane road and expand 6400 feet (or 1.2 miles) of existing two-lane roads into four and five-lane roads promoting new trips, currently non existing?

CN-59 | How can you state that the project does not generate new trips when for example the Average Daily Traffic increases from 2,420 to 23,355 at Phyllis Place in Table 5.2-10?

CN-60 | Why was the impact from all the new trips been completely disregarded in the air quality study? Why should we trust any of the air analysis if it misses such obvious point?

BIOLOGICAL RESOURCES

CN-61 | The RDEIR cites general references on this section however I didn't find a specific study of the undisturbed habitat along the rim, and in particular on the nesting of endangered species like the Least Bell's Vireo.

Can you please add to the RDEIR a specific study of what currently inhabits the rim area? How will the traffic, pollution and noise generated by the road connector affect it? Will the nesting of Least Bell's Vireo, or other endangered species be impacted?

MISSING FROM THE PEIR

The RDEIR fails to mention that, according to the 2012 CEQA Statute and Guidelines, the road connector has significant impact because it divides the Serra Mesa Community

CN-62 | According to the CEQA Statute and Guidelines
http://resources.ca.gov/ceqa/docs/CEQA_Handbook_2012_wo_covers.pdf :
'Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant.'

The five-lane major road with LOS F on Phyllis Place (from Franklin Ridge Road to I-805 SB ramp) proposed by the project will divide the Serra Mesa community as it will effectively block the connection of the Abbotshill neighborhood (west of 805) with the rest of Serra Mesa (east of 805) so the effect will be significant. Can you include in the PEIR a discussion on how the only communication between the Abbotshill neighborhood with the rest of Serra Mesa, currently provided by Phyllis Place, will be affected by the road connector and why this impact has not been addressed and considered significant?

The project contradict Mission Valley Community Plan and Civita's goals

CN-63 | The Mission Valley Community Plan and Civita's urban development both promote the use of public transportation, bicycles and walking as a sustainable way of transportation given the growth experimented in the area.
The proposed project would add a four lane road that promotes individual car transportation and contradicts Mission Valley Community Plan and Civita's proposed life style.

CN-63
cont.

Can you complete the RDEIR by including a discussion on how this road connector is still being pursued given that it contradicts Mission Valley Community Plan and Civita's urban development plan objectives?

I look forward to your response.

Respectfully,

Gabriela Surpi, Ph.D.
Serra Mesa resident

Letter CN: Gabriela Surpi

CN-1: The commenter indicates that comments on the DEIR are attached. This comment is an introductory statement indicating that specific comments are attached, and does not raise any specific issues requiring a response pursuant to CEQA. Responses to the commenter's specific comments are addressed in the responses to comments CN-2 through CN-63 below.

CN-2: The commenter indicates that a list of questions related to the accuracy and completeness of the DEIR are provided. The commenter alleges that the studies in the DEIR are not rigorous and the report lacks coherence and is contradictory. The commenter also alleges that some information is missing and incorrect, and that the errors always appear biased toward the proposed project. The commenter states the original intent of the project and expresses the opinion that the project was then repurposed as a freeway connector that would cause congestion, disruption, and pollution in residential areas. The commenter expresses the opinion that objectives were added to the recirculated DEIR to justify the project.

This comment provides several general opinions regarding the content and adequacy of the DEIR, including the associated technical studies, but does not provide any specific examples in this comment. This comment expresses the opinion that the proposed roadway was repurposed in the recirculated DEIR as a freeway connector that would cause congestion, disruption, and pollution in residential areas. The proposed roadway connection is not a "freeway connector," but rather provides a multi-modal linkage between the Serra Mesa and Mission Valley communities that would also provide an additional access point the I-805 freeway. Furthermore, the project objectives were modified to better reflect the basic objectives of the project. The changes to the objectives included a greater focus on multi-modal mobility and also reduced redundancy among the objectives. Moreover, nothing within CEQA or its implementing guidelines precludes modification of project objectives prior to recirculating a DEIR. As noted on page 1-3 and as further clarified within the FEIR, the previous program-level analysis was completely overhauled and a project-level analysis replaced it. Changes to the previous program EIR were comprehensive and were made in response to the public comments received during public review for the program EIR; as such, the CEQA objectives were updated to better reflect the proposed project. No changes to the FEIR are required as a result of this comment.

CN-3: The commenter cites text from the General Plan and Community Plan Amendment Manual regarding resolutions and expresses the opinion that the DEIR Project Description and Objectives do not follow the direction given by Resolution Number 304297, dated October 21, 2008, that motivated this environmental study.

Please see the response to comment G-14. The four questions needing resolution as set forth by the City Council within the amendment (Staff Recommendation Number 6) to the Quarry Falls project approval are detailed on page 3-2 of Chapter 3, *Project Description*, of the DEIR. These four questions, which were not objectives, formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*. Each of these questions are answered within relevant sections of the DEIR. No changes to the FEIR are required as a result of this comment.

CN-4: The commenter questions why the DEIR does not identify that further development has taken place since Resolution Number 304297 and the road connection is no longer necessary because Kaplan Drive already provides emergency, pedestrian, and bicycle access.

Please see the response to comment G-18. The FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2). The addition of this clarifying information does not affect the conclusions reached within the DEIR. The roadway connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. Please also see Table 5.2-23 of the DEIR for the changes in community access travel times with and without the proposed roadway connection. As demonstrated in Table 5.2-23, accessibility to a variety of public facilities and amenities increases with the road connection. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection and would not serve as an evacuation route for residents without access provided first by the City.

CN-5: The commenter asks why the DEIR does not focus on the study of the four questions raised by Resolution Number 304297 and if the DEIR is a legal report to be used for Resolution Number 304297. The commenter also asks if the DEIR can change the scope, add and study new objectives not included in the project initiated by Resolution Number 304297.

Please see the responses to comments G-14 and CN-3. The four questions needing resolution as set forth by the City Council within the amendment (Staff Recommendation Number 6; Resolution Number 304297) to the Quarry Falls project approval are detailed on page 3-2 of Chapter 3, *Project Description*, of the DEIR. These four questions formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*, but the questions themselves were never intended to be CEQA objectives. Each of these questions are answered within relevant sections of the DEIR. As discussed in response to comment G-16, the questions raised by City Council were not CEQA objectives for the proposed project, but were questions to which City Council requested answers. As set forth in Section 15124(b) of the CEQA Guidelines, a statement of the objectives sought by the proposed project is required to be included within the Project Description section of an EIR. This section also states: "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project, which is to provide a project that improves mobility between the Serra Mesa and Mission Valley Planning areas, improves regional access, improves emergency access and evacuation routes within the Serra Mesa and Mission Valley planning areas, provides safe and efficient multi-modal mobility, and resolves the inconsistency between the two community plans. The DEIR complied with CEQA's requirements and the objectives are included within Section 3.1 of Chapter 3, *Project Description*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

CN-6: The commenter asks how the direction given in Resolution Number 304297 resulted in a different and broader project. The commenter asks for an explanation of the process that led to the new project description and objectives used in the DEIR. The commenter also asks why objectives 2, 3, 4, and 5 were introduced when they are already met and not necessary.

Please see the response to comment CN-5. The questions raised by City Council were not CEQA objectives for the proposed project, but were questions to which City Council requested answers. As set forth in Section 15124(b) of the CEQA Guidelines, a statement of the objectives sought by the proposed project is required to be included within the Project Description section of an EIR. The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project. The DEIR complied with CEQA's requirements and the objectives are included within Section 3.1 of Chapter 3, *Project Description*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

CN-7: The commenter cites text from the project description of the DEIR and asks how it was determined from Resolution Number 304297 that the project should require a four-lane major street.

Please see the response to comment CN-5. The questions raised by City Council were not CEQA objectives for the proposed project, but were questions to which City Council requested answers. The four questions posed in Resolution Number 304297 formed the backbone of the project's CEQA objectives listed on the first page of Chapter 3, *Project Description*, of the DEIR. As set forth in Section 15124(b) of the CEQA Guidelines, a statement of the objectives sought by the proposed project is required to be included within the Project Description section of an EIR. The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project, which is to provide a project that improves mobility between the Serra Mesa and Mission Valley Planning areas, improves regional access, improves emergency access and evacuation routes within the Serra Mesa and Mission Valley planning areas, provides safe and efficient multi-modal mobility, and resolves the inconsistency between the two community plans. The City determined that a four-lane major street that includes sidewalks and Class II bike lanes would best achieve the project objectives. No changes to the FEIR are warranted as a result of this comment.

CN-8: The commenter asks why Objectives #4 and #5 were included in the DEIR when they have already been met by existing bike lanes in the area, Kaplan Drive access, and existing roads.

It is acknowledged that emergency access exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive and that Kaplan Drive provides bicycle and pedestrian access. This clarifying information has been added to the FEIR (see Section 5.2). The addition of this information does not affect the conclusions reached within the DEIR. However, Objective #4, which seeks to improve emergency access and evacuation, and Objective #5, which seeks to provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts, were included in the DEIR for multiple reasons. First, The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection. Second, because the current configuration at Kaplan Drive has bollards, there is no point of access for motorists between Quarry Falls and Serra Mesa, as set forth in Objective #5. Furthermore, it provides an alternate route for pedestrians and cyclists that may be a more direct route of travel depending on the destination of the pedestrian or cyclist.

CN-9: The commenter asks why Objective #2 was included in the DEIR when it has already been met and good local mobility between both communities exists via Mission Center Road and Mission Village Drive.

Project Objective #2 seeks to improve local mobility in the Serra Mesa and Mission Valley planning areas where currently only Mission Center Road and Mission Village Drive provide connectivity between the Mission Valley and Serra Mesa communities. The proposed roadway connection would provide the Mission Valley and Serra Mesa communities with greater options, and depending on the destination, more direct routes for travel between the two communities, which would be in addition to the existing connectivity provided by Mission Center Road and Mission Village Drive. As a result, local mobility between these two communities would improve for residents and visitors in the surrounding area. In addition, as discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, the proposed project would result in a region-wide decrease in VMT by shortening the travel distance between the Mission Valley and Serra Mesa communities and access to freeway facilities from Mission Valley.

CN-10: The commenter asks why Objective 3 is included in the DEIR and where it came from. The commenter requests if Objective 3's description can be completed by clarifying what freeway on-ramp and off-ramp it refers to, and what the limits of the surrounding areas are.

The City of San Diego as lead agency developed the project objectives and these objectives contain the underlying purpose of the proposed project. The traffic study area for the proposed project is defined in Section 5.2, *Transportation and Circulation*, of the DEIR. The project study area consists of 29 roadway segments, 24 intersections, 3 freeway mainline segments and 2 metered freeway ramps, which includes the I-805 northbound and southbound ramps. This area is bordered generally by Aero Drive to the north, Rio San Diego Drive to the south, and Mission Center Court and Northside Drive to the west and east, respectively. The project study area was determined by methodology consistent with the City of San Diego Traffic Impact Manual. The study area methodology is further described in Appendix D of the KOA Corporation Traffic Impact Study.

CN-11: The commenter asks if Objective 3 refers to access to the nearby I-805 freeway on-ramps and off-ramps at Phyllis/Murray, then why would alleviation be needed if there is currently no congestion at those ramps.

As detailed in Section 3.1 of the DEIR, Objective #3 fully states: Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. The first aspect of Objective #3 aims to alleviate traffic congestion. The proposed roadway connection would alleviate overall congestion in the Mission Valley and Serra Mesa communities. The proposed roadway connection would not generate any new vehicle trips, but rather would redistribute trips onto other regional circulation network infrastructure. As demonstrated in Section 5.2, *Transportation and Circulation*, of the DEIR, several roadway segments would experience a net decrease in the volume to capacity ratio, while several intersections would experience a net increase in delay with implementation of the project. Although some roadways and intersections would become more congested with the proposed roadway, the redistribution of traffic that would result from the proposed roadway connection would improve conditions at various other roadway facilities within the traffic study area in terms of level of service, delay, and volume to capacity ratio. For example, the intersection of Mission Center Road and Murray Ridge Road/Phyllis Place would experience a decrease in delay of 129.1 seconds during the PM peak hour under long-term (year 2035) conditions with the project. Please note that all roadways, intersections, freeways, and

freeway on-ramps would experience increased congestion under long-term (year 2035) conditions compared to near-term (year 2017) conditions due to buildout of the Mission Valley and Serra Mesa Community Plans. Regarding the second aspect of Objective #3 aiming to improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, the proposed roadway connection would provide a more direct connection to the I-805 on-ramps for local Mission Valley traffic compared to the existing routes along Mission Center Road. As discussed in Section 5.2, the proposed project would result in a region-wide decrease in VMT by shortening the travel distance between the Mission Valley and Serra Mesa communities and access to freeway facilities from Mission Valley.

CN-12: The commenter states that Resolution 304297 was aimed at improving police and fire response, emergency access, and pedestrian and bicycle access in the area. The commenter expresses the opinion that the project scope was changed so that the project now consists of a four-lane major street that will funnel traffic through residential areas to the I-805 freeway, generating significant and unavoidable congestion in the area. The commenter further expresses the opinion that it is inaccurate and unethical to claim one of the project objectives is to alleviate traffic and congestion that the project itself is creating.

The proposed project's potential impacts on transportation and circulation are analyzed and disclosed in the DEIR. As discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, no new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. These trips would be generated as the Mission Valley and Serra Mesa communities continue to grow, regardless of whether the proposed roadway is constructed. As demonstrated in Section 5.2, with implementation of the project, several roadway segments would experience a net decrease in the volume to capacity ratio, while several intersections would experience a net increase in delay. Although operations at some roadway segments and intersections would worsen, the redistribution of traffic that would result from the proposed roadway connection would improve conditions at various other roadway facilities within the traffic study area.

CN-13: The commenter summarizes the characteristics of the proposed roadway connection and expresses the opinion that the roadway would function as a freeway connector funneling non-local traffic to the area and creating congestion. The commenter expresses the opinion that the near-term (year 2017) traffic mitigation is much larger in scope when compared to the proposed roadway. The commenter also repeats the significant and unavoidable transportation/circulation impacts as stated in the DEIR.

The City disagrees with the commenter's opinion that the roadway would funnel non-local traffic to the area. The proposed roadway connection provides a multi-modal linkage between the Serra Mesa and Mission Valley communities. Multiple objectives of the proposed project are directed at improving local circulation, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. Additionally, the commenter's opinion that the near-term (year 2017) traffic mitigation is much larger in scope when compared to the proposed roadway is subjective. All of the mitigation measures identified in the DEIR are a direct result of the significant transportation and circulation impacts of the proposed project. Each mitigation measure is proposed for a specific significant

impact, and is designed to reduce impacts to less than significant to the maximum extent practicable. For impacts that would remain significant and unavoidable, the proposed mitigation measures would still reduce impacts; however, impacts would not be reduced below the applicable thresholds. Please note that the widening of Phyllis Place to a four-lane major is identified in the current Serra Mesa Community Plan, and therefore would occur with or without the project. Accordingly, MM-TRAF-3, which requires the widening of Phyllis Place from Franklin Ridge Road to I-805 southbound ramps, is consistent with the Serra Mesa Community Plan. No changes to the FEIR are required as a result of this comment.

CN-14: The commenter asks for an explanation how the DEIR proposes mitigation that is larger than the proposed roadway connection and in the end do not mitigate the project impacts. The commenter asks if the larger scope of the mitigation compared to the project disqualifies them as only mitigation, and as a result should be included as part of the project with their impacts analyzed.

Please see the response to comment CN-13 above. Section 15126.4(a)(1)(A) of the State CEQA Guidelines states that the discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. The mitigation measures identified in the DEIR are proposed to address the significant impacts of the proposed project. In accordance with Section 15126.4 of the State CEQA Guidelines, the proposed mitigation measures were not included as part of the project, but rather would be included as conditions of project approval. Regarding the commenter's request to study the environmental impacts of the mitigation measures, clarifying information has been added to the FEIR (see Section 5.2) related to the secondary effects from the mitigation itself. The addition of this information does not affect the conclusions reached within the DEIR.

CN-15: The commenter asks if the mitigations are considered, can an environmental study of their impacts be added. This comment is similar to Comment CN-14; please see the response to that comment. This clarifying information has been added to the FEIR (see Section 5.2). The addition of this information does not affect the conclusions reached within the DEIR.

CN-16: The commenter discusses Senate Bill (SB) 743 and its requirement to amend the CEQA Guidelines to provide alternatives to LOS for evaluating transportation impacts and cites examples of measuring transportation impacts such as vehicle miles traveled (VMT). The commenter cites text from the Office of Planning and Research's (OPR's) Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing SB 743 regarding the long-term effects of congestion relief projects (i.e., bigger roadways).

Please see the responses to comments G-87 and G-90. No changes to the FEIR are required as a result of this comment.

CN-17: The commenter restates the project and near-term (year 2017) and long-term traffic mitigation measures from the DEIR. The commenter expresses the opinion that the since the proposed project and mitigation measures will encourage new automobile trips to be generated and will increase VMT rather than promoting transit, the DEIR be completed by explaining why they're considered when they contradict SB 743.

Please see the responses to comments G-87 and G-90. No changes to the FEIR are required as a result of this comment.

CN-18: The commenter summarizes the history of the proposed project and expresses the opinion that Objectives 2, 4, and 5 of the DEIR are already accomplished by existing bike lanes, the Kaplan Drive connection, Mission Center Road, and Mission Village Drive.

Please see the responses to comments CN-8 and CN-9 above. No changes to the FEIR are required as a result of this comment.

CN-19: The commenter restates Objective 1 and asks if an alternative modifying the Mission Valley Community Plan to exclude the proposed connection can be included and analyzed to resolve the inconsistency between the Mission Valley and Serra Mesa Community Plans.

As discussed in Chapter 9.0, Alternatives, of the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative was one of the alternatives to the proposed project that was considered, but was ultimately rejected because it would not meet any of the project objectives. As detailed in Section 3.1 of the DEIR, the first project objective fully states: Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. The No Build/Remove from Mission Valley Community Plan Alternative was dismissed from further consideration in Section 9.4.1.2 of the DEIR. The analysis within the DEIR did consider the points mentioned by the commenter; however, the fact remains that this alternative does not fully meet the first project objective of providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. Finally, the proposed roadway connection cannot be removed from the Mission Valley Community Plan without the full impacts being analyzed under CEQA. Therefore, the No Build/Remove from Mission Valley Community Plan Alternative would not fully meet this alternative. No revisions to the FEIR are warranted as a result of this comment.

CN-20: The commenter restates Objective 3 and expresses the opinion that this objective has already been accomplished in the Serra Mesa area. The commenter further expresses the opinion that Objective 3 appears to be applicable to Mission Valley, as that area needs traffic alleviation, more efficient local freeway on- and off-ramps, and multi-modal transportation for the higher density areas of Mission Valley. The commenter requests the evaluation of an alternative to achieve better network connection, improved freeway access, and multi-modal transportation for Mission Valley within the boundaries of Mission Valley.

The overarching goal of the proposed project is to provide multi-modal connectivity between the Mission Valley and Serra Mesa communities. The commenter's request to include and analyze an alternative that achieves better network connection, improves freeway access, and multi-modal transportation for Mission Valley within the boundaries of Mission Valley would not meet any of the project objectives detailed in Chapter 3.0, Project Description, of the DEIR. As detailed in Section 3.1 of the DEIR, the first project objective fully states: Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. By recommending improvements solely to the circulation network in Mission Valley, the commenter is incorrectly interpreting the intent of the proposed project. No revisions to the FEIR are warranted as a result of this comment.

CN-21: The commenter cites the significant and unavoidable impact determinations of the DEIR for transportation/circulation and the conclusion in Chapter 9.0, Alternatives, of the DEIR regarding the environmentally superior alternative. The commenter expresses the opinion that the DEIR contradicts itself, because it concludes that both alternatives would result in significant and

unavoidable impacts related to increased VMT compared to the proposed project. The commenter asks for an explanation as to why Alternatives 1 and 2 should be doubted.

CEQA requires the consideration of a range of alternatives to the proposed project. Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. When the environmentally superior alternative is the No-Project Alternative, CEQA requires that another alternative be identified. As indicated in the comparative analysis on the pages that preceded, the No-Project Alternative reduces impacts within several issue areas—such as biological resources, historical and tribal cultural resources, and visual effects—and is therefore identified as the environmentally superior alternative. Because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative. For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative, because it would slightly reduce construction related impacts on biological resources, historical resources, and tribal cultural resources. It should be noted, however, that impacts on these resources would be mitigated to less than significant levels under the proposed project. As a result, the No-Project Alternative, Bicycle, Pedestrian, and Emergency Access Only Alternative, and the proposed project would all result in less than significant or no impacts to biological resources, historical resources, and tribal cultural resources.

As discussed in Section 5.2 of the DEIR, the VMT analysis shows that traffic currently taking a circuitous route from Serra Mesa and surrounding neighborhoods to Mission Valley would have a more direct connection to the commercial area in Mission Valley, reducing VMT and trip length in the process. Meaning, the proposed project would provide a more direct connection for local trips in the Serra Mesa and Mission Valley communities, reducing the total vehicle miles traveled compared to existing conditions. Under both the No-Project Alternative and Bicycle, Pedestrian, and Emergency Access Only Alternative, passenger vehicles would have to continue to take a circuitous route from Serra Mesa and surrounding neighborhoods to Mission Valley. For these reasons, both Alternative 1 and Alternative 2 would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Accordingly, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project. These determinations are provided in Section 9.5.3 of the DEIR. Pursuant to Section 15126.6 of the State CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The DEIR satisfies this requirement of the State CEQA Guidelines. Therefore, no changes to the FEIR are warranted as a result of this comment.

CN-22: The commenter expresses the opinion that the traffic congestion, additional vehicle trips, and increased VMT are a result of the proposed project.

This comment is similar to comments CN-12, CN-16, and CN-17; please see the responses to those comments. The commenter's opinion that the project would increase VMT is incorrect. VMT was analyzed for both the near-term (year 2017) and long-term (year 2035) scenarios. Under both of these scenarios, the VMT analysis demonstrated that the proposed project would reduce VMT within the study area and the region because the proposed project would provide a more direct connection for local trips in the Serra Mesa and Mission Valley communities. No changes to the FEIR are warranted as a result of this comment.

CN-23: The commenter expresses the opinion that Mission Valley residents using the proposed roadway connection to access I-805 south significantly increases VMT compared to existing routes, and that Mission Valley residents traveling north already have two options. The commenter asks if the City is proposing that the proposed roadway and widening of existing roads will decrease VMT, and that all existing studies on VMT proving the opposite are wrong. The commenter asks if an alternative solution for Mission Valley's congestion can be proposed that does not generate new automobile trips, increase VMT, and increase LOS in Serra Mesa.

This comment is similar to comments CN-16, CN-17, and CN-22; please see the responses to those comments. The commenter does not provide any specific examples of existing VMT studies that the City is allegedly disagreeing with. As demonstrated in Section 5.2, VMT was analyzed for both the near-term (year 2017) and long-term (year 2035) scenarios. Under both of these scenarios, the VMT analysis demonstrated that the proposed project would reduce VMT within the study area and the region because the proposed project would provide a more direct connection for local trips in the Serra Mesa and Mission Valley communities. It is important to note that no new trips would be added by the proposed roadway connection. Rather, vehicle trips would be redistributed onto other existing regional circulation infrastructure. These trips would be generated as buildout of the Mission Valley and Serra Mesa community plans occur, regardless of whether the project is implemented. The proposed roadway merely provides additional travel options for passenger vehicles, bicyclists, and pedestrians commuting between Mission Valley and Serra Mesa. It is also important to note that the widening of Phyllis Place is identified in the current Serra Mesa Community Plan, and could occur with or without implementation of the proposed roadway connection. Furthermore, the commenter's request to provide an alternative solution to Mission Valley's congestion undermines the underlying purpose of the proposed project. As detailed in Section 3.1 of the DEIR, there are several objectives of the proposed project, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing safe and efficient multi-modal mobility. An alternative that focuses solely on improving congestion in Mission Valley would not meet any or most of the project objectives. No changes to the FEIR are warranted as a result of this comment.

CN-24: The commenter expresses concerns regarding count data and study scenarios and asks why the traffic study did not follow the City guidelines and collect current count, instead of using a model to estimate the existing conditions (Near-Term 2017 Baseline) from data collected almost 4 years ago or older.

Please see the response to comment G-61.

CN-25: The commenter expresses concerns regarding the SANDAG model data and asks why any results of this model should be trusted if the model already showed obvious poor performance in some predictions that required post-model adjustments, and how can one affirm that the model predictions that are not obviously wrong are actually accurate.

Please see the response to comment G-62.

CN-26: The commenter expresses concerns regarding the SANDAG model data and asks why the model used and adjustments done not clearly explained, what known and proposed development

projects were accounted by the model and how, what known and proposed development projects not accounted by the model were accounted by City Staff and how, and what specific model predictions were poor and adjusted.

Please see the response to comment G-62.

CN-27: The commenter expresses concerns regarding the SANDAG model data and asks how the report can estimate a baseline into the future when traffic conditions are rapidly changing and authors don't know when the road would be built.

Please see the response to comment G-62.

CN-28: The commenter expresses concerns about the validity of the VMT modeling, including a lack of authorship and a description of the specific assumptions and methods used.

Please see the response to comment G-87. The VMT modeling information shown in Appendix H is an output from the SANDAG Series 12 Regional Model VMT analysis. It should be noted that this information is wholly separate from the KOA Corporation and Chen Ryan Associates TISs, which analyze LOS.

CN-29: The commenter expresses concerns about the validity of the VMT modeling and asks who the authors of Appendix H are and if they have generated any other content used in the report.

Please see the response to comment CN-28.

CN-30: The commenter expresses concerns about the validity of the VMT modeling, stating that the recirculated DEIR includes two traffic studies using different criteria, one using LOS and the other VMT.

Please see the response to comment CN-28.

CN-31: The commenter expresses concerns about the validity of the VMT modeling, stating that the two metrics, LOS and VMT, are not compatible and cannot be used simultaneously and asks why the results of a study using both should be trusted.

Please see the response to comment CN-28.

CN-32: The commenter expresses concerns regarding the traffic analysis, stating that peak hour volume (PHV) is recognized as a more accurate measurement to estimate traffic operation conditions and traffic impact, and asks if this metric can be added to the DEIR for all roadways, intersections, and ramps instead of ADT with conclusions adjusted accordingly.

All traffic analyses were completed in accordance with the City of San Diego Traffic Impact Manual. No changes to the FEIR are required in response to this comment.

CN-33: The commenter expresses concerns regarding roadway analysis results for Phyllis Place between Abbotshill Road and Franklin Ridge Road and asks if the LOS of Phyllis Place between Abbotshill Road and Franklin Ridge Road can be adjusted to show the actual expected level of service.

The roadway analyses shown in the DEIR were correctly evaluated based on the City of San Diego Traffic Impact Manual. Further, mitigation is proposed for the segment which is shown as impacted, and referenced in the comment.

CN-34: The commenter expresses concerns regarding the traffic analysis, particularly with respect to LOS and V/C, and asks how many more LOS calculated as V/C and provided in the tables disregard the impact of adjacent segments and have their level of congestion also underestimated.

Please see the response to comment CN-32.

CN-35: The commenter asks if the impact on safety and delay on emergency response for Abbotshill area residents due to the congestion the project will create at Phyllis Place can be addressed.

Please see the response to comment G-126.

CN-36: The commenter expresses the opinion that the DEIR provides an incorrect land use for the portion of the project that would be constructed in the location of the approved Phyllis Place Park. The commenter suggests that the land use designation should be “Park,” rather than the project area description of “Residential” and “Multiple Use” as described in the DEIR.

This comment is beyond the scope of the DEIR and does not address the adequacy of the DEIR. The City offers the following response and clarification:

The Serra Mesa Community Plan designates the project site within the Serra Mesa Community Planning area as Residential Low Density (5-9 units net) on Figure 17 of the community plan, and the adopted land use is correctly reflected as Residential in Figure 5.1-1 of the DEIR. The Residential land use is implemented through the RS-1-7 zone, as shown in Figure 5.1-2 of the DEIR. With regards to park uses, both active and passive recreation are permitted uses within the RS-1-7 zone.

CN-37: The commenter states that the Serra Mesa Community Plan designates the area where the project would take place as “Open Space” on Figure 14 of the plan.

This comment is beyond the scope of the DEIR and does not address the adequacy of the DEIR. The City offers the following response and clarification:

The Serra Mesa Community Plan designates the project site within the Serra Mesa Community Planning area as Residential, and the adopted land use is correctly reflected as Residential in Figure 5.1-1 of the DEIR.

As described in the Plan Elements section of the Serra Mesa Community Plan, the first seven elements contain information on existing conditions and trends; problems and issues; and goals, objectives, and proposals. It is the Implementation Element, which establishes the realization and prioritization of the aforementioned plan items. Figure 17, Community Plan Land Use 1990, designates the project area for Residential Low Density (5-9 units net) and is consistent with the underlying RS-1-7 zone.

Figure 14, Environmental Management (Open Space), serves as a means of reference and information, and identifies areas within the community where open space policies apply. The proposed project is consistent with open space plan policies which allow for low-density urbanization through the residential low density land use designation and the implementation of the Environmentally Sensitive Lands regulations.

CN-38: The commenter provides a photograph of the project area and expresses the opinion that two-dimensional maps fail to properly describe the land area south of Phyllis Place.

This comment provides a photograph of the land area south of Phyllis Place, but does not specifically raise issue regarding the adequacy of the DEIR. The comment does not raise any specific environmental issues.

CN-39: The commenter expresses the opinion that the land provides unique scenic views of Mission Valley from Serra Mesa that give visual and psychological relief from the dreadful tedium and tension of interminable development. The commenter expresses the opinion that these ingredients are consistent with the definition of “Open Space” from the Serra Mesa Community Plan and the General Plan, and asks how it is possible that the project area has three different designations (park, residential/multiple use, and open space) in different City documents.

Please see the responses to comments CN-36 and CN-37. The commenter is incorrect in stating that the project site has three different land use designations. The project site has a General Plan land use category of Residential. The project site is not designated as open space by the General Plan. As previously described, the project site is within the Serra Mesa and Mission Valley community plan areas. The Serra Mesa Community Plan designates the project site as “Low-Density Residential.” Within the Mission Valley portion, the project site is within the Quarry Falls Specific Plan area, which is designated as Multi-Use under the Mission Valley Community Plan. While two General Development Plans for Phyllis Place Park have been approved, no construction or grading permits have been issued for the park. As such, the proposed Phyllis Place Park has not been officially approved, and the area of the proposed park therefore does not have a land use designation of “Park.” No changes to the FEIR are warranted as a result of this comment.

CN-40: The commenter expresses the opinion that the land would be best for residents if converted into the already approved park. The commenter asks for an explanation as to how the DEIR claims the land would better be used as a four-lane Collector, adjacent to a new five-lane Major Arterial (Phyllis Place), and how this is not a significant land use impact.

The commenter’s opinion that the DEIR claims that the location of the proposed Phyllis Place Park would be better used if it is converted into a roadway is incorrect. The DEIR does not make any such claim that the project site, a portion of which is currently proposed as Phyllis Place Park, would be better used as a four-lane Collector than as a park. Please see responses to Comments K-27 and BQ-8. It is acknowledged therein that the proposed project would somewhat divide the park. However, two General Development Plans for Phyllis Place Park have been approved: one that assumed the road connection would occur and one that did not. In either case, the acreage within the park would remain the same. Accordingly, while the proposed roadway would bisect the future Phyllis Place Park, no loss of park space would occur with implementation of the project. No changes to the FEIR are warranted as a result of this comment.

CN-41: The commenter cites text from the City’s Significance Determination Thresholds for visual impacts and expresses the opinion that the less than significant visual impact is inaccurate because the project will create a disorganized appearance of Phyllis Place Park with an exceeding monotonous visual exposure to a four-lane traffic circulation. The commenter asks if the DEIR can be corrected to properly assess visual impacts as significant based on the City’s thresholds.

The potential visual resources impacts of the proposed project are analyzed within Section 5.9, *Visual Effects and Neighborhood Character*, specifically within Section 5.9.5. As detailed therein, within the context of the substantial development occurring at the Quarry Falls site and other existing development in the vicinity of the project site, the inclusion of a relatively small segment of roadway (460 feet long by 120 feet wide, which includes landscaping and pedestrian facilities in this

width) would be minimally discernible from the surrounding area, particularly when viewed from the valley floor, and would be within the visual character of the existing urbanized area where vehicles are typically present—along the I-805, Phyllis Place, and roadways within the Quarry Falls development—to serve the existing development in these areas. The future presence of vehicles where there is currently a roadway and nearby freeway access would not represent a change in the existing visual character. It is acknowledged that the proposed project would somewhat divide the proposed Phyllis Place Park; however, this would not represent a significant impact related to aesthetics. The park has not yet been constructed. Although the park would be slightly interrupted in continuity, this would not represent a significant impact related to aesthetics.

Furthermore, implementation of the proposed project would generally improve upon the existing condition, which is currently a disturbed and graded hillside by incorporating California native landscaping, including trees. No changes to the EIR are required as a result of this comment.

CN-42: The commenter requests that the inaccurate conclusion that the project will have less than significant impacts on visual quality be corrected because the project will replace scenic views of Mission Valley with views of a four-lane road carrying noise and pollution.

Please see the response to comment CN-41. The future presence of vehicles where there is currently a roadway and nearby freeway access would not represent a change in the existing visual character. In addition, implementation of the proposed project would generally improve upon the existing condition, which is currently a disturbed and graded hillside by incorporating California native landscaping, including trees. Moreover, the roadway would still permit the same amount of parkland along Phyllis Place. Furthermore, changes in community character are considered a social issue and not an environmental issue subject to CEQA (*Preserve Poway v. City of Poway*, 245 Cal. App. 4th 560).

Regarding the commenter's opinion that the proposed roadway connection will carry noise and pollution, the DEIR adequately details the potential impacts of the proposed project related to noise and air pollution. As detailed in Section 5.4, *Noise*, with the implementation of mitigation measures, the proposed project would result in less than significant construction noise impacts. All other issues within that section were determined to be less than significant, including traffic noise. Section 5.3, *Air Quality*, determined that potential impacts to air quality would be less than significant. No changes to the EIR are required as a result of this comment.

CN-43: The commenter cites text from the City's Significance Determination Thresholds related to impacts on neighborhood character and compatibility and landform alteration. The commenter expresses the opinion that the project would strongly contrast with the planned Phyllis Place Park and hillside area by introducing a noisy and polluting four-lane steep road with heavy traffic and bulk traffic lights and signals, and requests that the DEIR be corrected to identify a significant impact on neighborhood character.

This comment is similar to comments CN-41 and CN-42; please see the responses to those comments. No changes to the EIR are required as a result of this comment.

CN-44: The commenter cites goals from the Serra Mesa Community Plan and describes the character of the Serra Mesa area surrounding the project as low density residential with low speed neighborhood roads. The commenter expresses the opinion that the Serra Mesa community provides a safe, balanced, and efficient transportation system that also includes the approved Phyllis Place Park. The commenter asks that the DEIR be revised to describe how the project will contradict

the goals of the Serra Mesa Community Plan by disrupting residential character and negatively affecting the construction of Phyllis Place Park.

Please see the responses to comments CN-39 through CN-41. The consistency of the proposed project with the Serra Mesa Community Plan is provided in Table 5.1-2 of the DEIR. As demonstrated in Table 5.1-2, the proposed project would be consistent with the applicable goals, policies, guidelines, and recommendations contained within the Serra Mesa Community Plan. With the exception of the significant and unavoidable transportation/circulation impacts identified in Section 5.2 of the DEIR, all potentially significant impacts were determined to be less than significant with or without mitigation for all other issue areas studied. Implementation of the proposed project would generally improve upon the existing condition of the project site, which is currently a disturbed and graded hillside by incorporating California native landscaping, including trees. Additionally, changes in community character are considered a social issue and not an environmental issue subject to CEQA (*Preserve Poway v. City of Poway*, 245 Cal. App. 4th 560). Furthermore, while the proposed roadway would bisect the future Phyllis Place Park, the acreage within the park would remain the same. Therefore, no loss of park space would occur with implementation of the project. No changes to the EIR are required as a result of this comment.

CN-45: The commenter cites the 60 CNEL exterior noise threshold for residential uses from the Noise Element of the City of San Diego's and County of San Diego's General Plans. The commenter states that these documents both apply the 60 dB threshold to transportation noise, but cites that the DEIR uses a 65 dB CNEL threshold instead. The commenter asks why the DEIR uses a 65 dB threshold rather than the City's 60 dB threshold. The commenter also asks if an increase by 3 dB or more will be significant if the existing condition is at or over 60 dB.

The first document referenced in the comment is the County Noise Element, not a City regulation. Therefore, this document is not used in developing thresholds of impact for the proposed project and does not need to be incorporated into the EIR. It is also noted that the second document is a slightly outdated version of the City's Noise Element from 2008; the most recent version was amended in 2015. The Land Use - Noise Compatibility Guidelines referenced in the comment are intended primarily to guide the location and development of new noise-sensitive land uses. However, the proposed project is a roadway connection and does not involve the development of any new noise-sensitive land uses. The thresholds used in the DEIR are based on the most recent (July 2016) City of San Diego California Environmental Quality Act, Significance Determination Thresholds. These thresholds for traffic noise clearly state that 65 dB CNEL is the threshold for all of the most sensitive land uses (single-family detached homes, multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes). The thresholds also state that "[i]f 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 these thresholds were developed by the City specifically for analyzing potential impacts pursuant to CEQA, they are the most appropriate thresholds to be used in the DEIR. No changes to the FEIR are warranted as a result of this comment.

CN-46: The commenter asks if the impact on R11 in Table 5.4-7 would be significant due to an increase by 3 or more dB.

Please see the response to comment CN-45. Per the City's thresholds of impact for traffic noise, and the thresholds established in the DEIR, the impact would be less than significant because the

resulting noise level does not exceed 65 dB CNEL. As such, no changes to the FEIR are warranted as a result of this comment.

CN-47: The commenter asks if the DEIR can be revisited to evaluate and conclude on the 60 dB threshold adopted by the City instead of 65 dB, and if not explain why.

Please see the response to comment CN-45. As described above, 65 dB CNEL is considered the correct and appropriate threshold based on the City's established CEQA guidelines. As such, no changes to the FEIR are warranted as a result of this comment.

CN-48: The commenter cites text from the City's Significance Determination Thresholds defining noise-sensitive land uses, and states that the proposed project will take place where Phyllis Place Park has already been approved. The commenter states asks why the DEIR did not study how noise from new traffic will affect the approved Phyllis Place Park. The commenter asks if that analysis can be included, and if not to explain why.

The FEIR has been updated to add a receptor location, R12, to represent Phyllis Place Park. Based on plans for the park, the receptor was placed at the area closest to the roadway connection that would be used for extended periods. This area consists of playgrounds and picnic tables located within approximately 50 feet of the centerline of Phyllis Place, west of the proposed roadway connection. The predicted future with project noise level at this location is approximately 61 dB CNEL. This is below the guideline of 65 dB CNEL and, as a result, there are no new impacts due to this comment.

CN-49: The commenter cites an excerpt from the County of San Diego's General Plan related to traffic noise, as well as an excerpt from the Journal of Acoustical Society of America regarding sound propagation. The commenter identifies various elements that were not considered in Appendix E of the DEIR, including motorcycle noise, wind conditions, the grade of the road, and road surface type. The commenter asks why the effects of these elements were not included in the noise analysis. The commenter asks how any findings can be trusted from the noise analysis since these elements were not included and their effects are known to be significant.

Regarding motorcycles – Not specifically identifying motorcycles in traffic noise modeling is industry standard practice because motorcycles are typically a very small percentage of overall vehicles and are not broken out as a separate category in traffic studies; motorcycles are included in the counts for passenger vehicles (i.e., automobiles). Regarding wind – the traffic noise analysis described in the DEIR used the Federal Highway Administration's (FHWA) Traffic Noise Model (TNM) 2.5, which is the most recent approved federal software for analysis of traffic noise. TNM assumes neutral conditions for the effect of wind, and variable wind effects are beyond the technical capabilities of the model; therefore, the approach used for wind conditions is consistent with standard industry practice and federal requirements for roadway projects. Regarding roadway grade—TNM automatically adjusts (increases) the modeled noise emissions for vehicles traveling up a slope, so this effect has been included in the noise modeling for the DEIR. Regarding roadway surface—TNM assumes the federally approved "average pavement" type, which is based on average vehicle noise emissions data for vehicles driving on dense-graded asphaltic concrete (DGAC) and Portland cement concrete (PCC) roadways. The model also accounts for the noise propagation effects of the acoustically "hard" ground presented by the roadway surface. For the reasons noted above, the effects of motorcycles, wind conditions, road grade, and surface type were handled pursuant to industry standards and accounted for to the extent practical based on available data and accepted modeling software. No changes to the FEIR are warranted as a result of this comment.

CN-50: The commenter asks if a proper noise study can be added that includes these elements and any other significant effects that were overlooked.

Please see the response to comment CN-49 above. The current traffic noise study is considered adequate, and no changes to the FEIR are warranted as a result of this comment.

CN-51: The commenter asks if the inclusion of these effects generates a significant noise impact.

Please see the responses to comments CN-49 and CN-50 above. The current traffic noise study is considered adequate, and no changes to the FEIR are warranted as a result of this comment.

CN-52: The commenter expresses the opinion that two sources of noise with magnitudes X dB and Y dB combine into a noise of magnitude Z dB, where $Z > X$, $Z > Y$, and $Z < X + Y$. The commenter states that this is because the dB of different sources is not additive. The commenter provides the link to a calculator. The commenter provides text from Table 5.4-7 of the DEIR for receptors R5 and R6, and expresses the opinion that a measure of 0 and 53 dB as the noise added by the project is contradictory. The commenter asks for clarification of what the noise added by the road connector to R5 and R6 in Table 5.4-7 is.

In order to respond to this comment, it is useful to clarify some general details of the analysis:

- Results from the traffic noise model (TNM) are output to one decimal place, as reported in the appendices of the Noise Technical Report (DEIR Appendix E). However, the noise levels reported in Table 5.4-7 are all rounded to 1 decimal place for ease of presentation. As a consequence, noise increases reported as 0 dB may actually be on the order of 0.1 to 0.5 dB. This does not change the findings of impact for the project, but may lead to some counterintuitive results when additional calculations are conducted using the rounded values rather than the actual model outputs.
- The effects of the project are the combined effects of the entire roadway network and how traffic volumes would change as a result of the project, not just the direct effect of noise emanating from the proposed section of brand new roadway that would be constructed for the new connector. Where changes in noise levels are reported, they may be net effect from multiple roads.

At R5 under opening year conditions the noise level, before rounding, actually increases from 59.2 to 59.6 dB CNEL, for a net increase of 0.4 dB. This indicates that all changes in traffic affecting this location as a result of the proposed project add a net 49.0 dB to the noise level. At R6 under opening year conditions the noise level, before rounding, actually increases from 61.7 to 62.1 dB CNEL, for a net increase of 0.4 dB. This indicates that all changes in traffic affecting this location as a result of the proposed project add a net 51.5 dB to the noise level. The differences inferred by the commenter from the summarized results in the EIR are a result of the rounded values used in the reporting of the results.

CN-53: The commenter expresses the opinion that the 53 dB added by the proposed roadway is significantly underestimated compared to other similar noise sources mentioned in the report. The commenter states that Table 5.4-7 shows noise at roads with similar levels of traffic as the proposed roadway are around 68-69 dB. The commenter asks for a description of how the noise levels added by the project were calculated.

The reported noise levels were calculated using a noise model to represent the roadway network with traffic volumes determined by the project traffic study for each of the studied scenarios

(existing, opening year without project, opening year with project, etc.), as described in the Noise Technical Report and clarified in the various responses to comments regarding noise. The primary reason that lower noise levels are reported at receptor R5, when compared to R9 and R10, is that R5 is adjacent to the west end of Phyllis Place (i.e., west of the proposed roadway connection); traffic volumes on the west end of Phyllis Place are not predicted to increase substantially under long-term conditions and would remain below 2,500 vehicles per day. The primary reason that lower noise levels are reported at receptor R6, when compared to R9 and R10, is that the receptor (City View Church) is set back approximately 200 feet from Phyllis Place; R9 has higher noise levels due to its elevated location with line-of-sight to both Mission Center Road and I-805; R10 has higher noise levels due to its closer proximity to the nearest street (Murray Ridge Road).

CN-54: The commenter asks how it is possible that the new road will add significant new traffic (compared to existing) to R5 and R6, but the new traffic noise added (estimated between 0 to 53 dB in the DEIR) is lower than the current traffic noise in these quiet residential areas. The commenter asks for an explanation for the contradiction.

More accurate estimates of the predicted noise increases are provided in response to comment CN-52, above, based on the detailed result from the updated traffic noise modeling, rather than the summary of values (rounded to whole numbers) in the DEIR. When calculated to one decimal place, increases at both R5 and R6 are approximately 0.4 dB due to the project under opening year conditions. The reason for this relatively low increase at R5 is that R5 is over 300 feet west of the proposed roadway connection, adjacent to the segment of Phyllis Place that is not expected to experience traffic increases as a result of the project. The reason for this relatively low increase at R6 is that noise levels at R6 are more heavily dominated by traffic on I-805, meaning changes on nearby local streets are proportionally less important to the overall traffic noise levels at this location (especially given the logarithmic nature of dB addition).

CN-55: The commenter cites text from Table 5.4-7 of the DEIR for receptors R3 and R7, and states that a discrepancy to the noises added to these receptors suggests the proposed roadway will add noise levels of 57-59 dB. The commenter asks for Table 5.4-7 to be clarified to include what the noise added by the road connector (in dB) to each R* location is.

As discussed under response to comment CN-52 above, the commenter is performing calculations using the whole-number summary noise level values reported in the DEIR. This leads to potentially large errors in the resulting calculations. To provide additional detail, the Final EIR has been updated to report traffic noise levels to a tenth of a dB, rather than rounding values to whole numbers. In the summary table, a column has also been added to show the effective noise level added (or subtracted) by the project at each receiver. Please note that this is the net effect of all the traffic changes resulting from the project, not solely the noise generated directly from traffic driving on the proposed roadway connector.

CN-56: The commenter states that the noise study quantified average noise generated by the project, but did not include impacts associated with the loud short term noise generated by sirens, honking, loud motorcycles, tires slipping with no grip on hard acceleration and braking, and high RPM vehicle engines trying to go uphill. The commenter asks if these can be added to the study to make a complete assessment on noise impacts, and if not explain why.

The noise study was conducted based on the City of San Diego's CEQA thresholds for traffic noise impacts in accordance with standard practice for traffic noise analyses. Therefore, the impact

determinations within Section 5.4, *Noise*, of the DEIR, remain valid. No changes to the FEIR are warranted as a result of this comment.

CN-57: The commenter asks how the project would not conflict with zoning designations when the project would cause queuing along Phyllis Place, which will operate at LOS F (Table 5.2-10) along the roadway connection.

See response to comment G-164. The commenter notes that traffic conditions along Phyllis Place at the I-805 ramps would degrade to LOS F under project conditions before mitigation, but mitigation to widen and re-stripe Murray Ridge/Phyllis Place at the I-805 ramps would operate at LOS C or better (See Table 5.2-14). Moreover, the commenter fails to note that the project would reduce regional VMT and therefore reducing overall emissions relative to near- and long-term baseline conditions. No changes to the FEIR are required as a result of this comment.

CN-58: The commenter summarizes a statement in the recirculated DEIR that says “the proposed project would not include trip-generating uses (e.g., residential or commercial units)” and asks why the recirculated DEIR states the project will not generate new trips when the new roadway would promote new trips that currently do not exist.

The project is a roadway connection that would not add any new trips to regional circulation network; rather, the project would provide a multi-modal connection between two communities that currently lack connectivity, thereby redistributing trips between regional circulation network infrastructure. While the project does not add any vehicle trips to the regional network, the project would result in additional vehicle trips to the project area, while pulling trips away from other roadway segments and intersections. As noted in previous comment responses, the roadway connection would reduce VMT both within the project area and regionally, which would improve freeway mainline conditions and reduce overall vehicle-related emissions with the decrease in VMT. Therefore, because the project is not creating new trips and because the project would reduce regional VMT, no changes to the FEIR are required as a result of this comment.

CN-59: The commenter asks how the DEIR can state this given the increase in ADT at some roadway segments, specifically using Phyllis Place as an example.

Please see the response to comment CN-58, which is essentially the same comment. The project is not creating trips; instead, the project would redistribute trips by providing for a more efficient, integrated circulation network for Serra Mesa and Mission Valley that would improve access in the area and provide an additional linkage for pedestrians and cyclists. Therefore, because the project is not creating new trips and would instead provide a more efficient link for vehicles, pedestrians, and cyclists, no changes to the FEIR are required as a result of this comment.

CN-60: The commenter alleges that the air quality analysis disregards the impact from new trips.

The air quality effects of all traffic, including redistributed trips (which the commenter terms “new trips”), is included in both the regional emission calculations (Table 5.3-6), which take into account all VMT, and the microscale carbon monoxide hotspots (Table 5.3-7), which analyze pollutant concentrations at the most heavily congested intersections. In both situations, the impacts from the proposed project were found to be less than significant. Therefore, because the air quality analysis includes all vehicle trips, no changes to the FEIR are required as a result of this comment.

CN-61: The commenter states that they were unable to find a specific study of the undisturbed habitat along the rim, and in particular on the nesting of endangered species like the Least Bell's

Vireo. The commenter asks if a study could be added to the DEIR of what currently inhabits the rim area, how traffic, pollution, and noise will affect it, and if Least Bell's Vireo or other endangered species would be affected.

As indicated in Section 5.5, *Biological Resources*, of the DEIR, a Biological Resources Letter Report was prepared for the proposed project and is included as Appendix F-1 of the DEIR. A Supplemental Biological Resources Letter Report was prepared for the gas line work area, included as Appendix F-2. ICF conducted a biological survey within two small areas immediately east and west of the existing project site for the project in order to determine if sensitive biological resources were present. These areas were incorporated within the project site. Figure 5.5-1 of Section 5.5 depicts the vegetation communities within a 100-foot buffer of the proposed roadway connection, which includes disturbed coastal sage scrub, developed land, and disturbed habitat vegetation communities. As discussed in Section 5.5, coastal California gnatcatcher was recorded within habitat located 1,000 feet east of the project site, to the east of the site near I-805. No other special-status species have been recorded within or adjacent to the project site. Although not observed within the project site, coastal California gnatcatcher, Dulzura pocket mouse, and northwestern San Diego pocket mouse have a moderate potential to occur. The coastal sage scrub within the project site is limited in size and highly disturbed in character, providing relatively few resources for wildlife due to the lack of cover and structural diversity. Additionally, there is no suitable habitat within the project site that would support nesting for the coastal California gnatcatcher. Because construction activities would have the potential to directly affect these species, a significant impact was identified in the DEIR. However, with the implementation of mitigation measure MM-BIO-1, which requires biological resources protection measures during construction, potential impacts were determined to be less than significant after mitigation. No changes to the FEIR are warranted as a result of this comment.

CN-62: The commenter cites text from the 2012 CEQA Statute and Guidelines related to dividing an existing community, and expresses the opinion that the five-lane major road with LOS F on Phyllis Place proposed by the project will divide the Serra Mesa community because it will block the Abbotshill neighborhood with the rest of Serra Mesa, so the effect will be significant. The commenter asks for a discussion to be added to the EIR on how the communication between this neighborhood and the rest of Serra Mesa will be affected, and why this impact has not been addressed and considered significant.

Concerning the comments related to why a roadway would make the existing neighborhood within Serra Mesa west of the project site inaccessible for the residents that live there, the City does not agree with these comments. The potential impacts of the proposed project as it relates to dividing an established community are analyzed under Issue 4 of Section 5.1, *Land Use*, of the DEIR. As discussed in Section 5.1, the proposed project would include a roadway connection close to regional roadways and freeways (I-805) that, if constructed, would provide a direct connection between the Serra Mesa and Mission Valley community planning areas and more access options for regional trips. Serra Mesa and Mission Valley are currently somewhat divided in the vicinity of the project site due to intervening topography and steep slopes. As such, the street connection between the two adjacent communities would not divide an existing community but would help link them; thus, the proposed project would help achieve the General Plan goal of providing an interconnected street system that provides multiple linkages within and between communities. While traffic congestion would increase along Phyllis Place as a result of the proposed project, particularly east of the Phyllis Place and Franklin Ridge Road intersection, this congestion would be not considered a physical division of a community under CEQA. The inclusion of a roadway would increase access options for

those in the Abbotshill neighborhood, including Mission Valley, where they currently have to take a circuitous route by vehicle to access (i.e., Phyllis Place to Murray Ridge Road to Mission Center Road), which increases VMT, gas mileage, etc. compared to the proposed project. Although the traffic analysis (see DEIR Section 5.2.5) does show that roadway volumes increase in the long-term analysis due to cumulative growth factors, the intersection of Phyllis Place and Franklin Ridge Road would operate at LOS A and B in the AM and PM peak hour, respectively (see Table 5.2-17). Traffic conditions within the vicinity of the project site would not be as described by the commenter, where vehicles, pedestrians, or cyclists using Phyllis Place to travel westward in the Abbotshill neighborhood would not be able to access it. No changes to the FEIR are warranted as a result of this comment.

CN-63: The commenter expresses the opinion that the proposed roadway connection contradicts the Mission Valley Community Plan and Civita's urban development, which both promote the use of public transit, bicycling and walking. The commenter asks for a discussion to be added to the EIR on how the proposed project is still being pursued despite this contradiction.

The City disagrees with the commenter's opinion that the proposed roadway connection contradicts the promotion of the use of public transportation, bicycles, and walking as a sustainable way of transportation by the Mission Valley Community Plan and Civita's urban development. First of all, the proposed project would provide a roadway with two intersections, sidewalks, and bicycle lanes all designed in accordance with the City of San Diego's Street Design Manual (2002). The City's Bicycle Master Plan proposes Class II (Bike Lane) facilities along Phyllis Place, Via Alta, Franklin Ridge Road, and Civita Boulevard. The Class II Bike Lane is shown connecting north toward Phyllis Place and across I-805 to Murray Ridge Road. It is also shown connecting to Friars Road from two points on the south from Civita Boulevard. The proposed project would provide bicycle connectivity from Phyllis Place southward to Via Alta and Franklin Ridge Road, and the addition of Class II bike lanes would create a multi-modal linkage between the Mission Valley and Serra Mesa communities. Additionally, pedestrian access would be provided to and from Serra Mesa and Mission Valley and crossings at the two proposed intersections. As a result, the proposed project would complete the pedestrian and bicycle network northward to Phyllis Place, which would provide a connection for pedestrians and cyclists to travel southward to trolley stations, and vice versa.

Secondly, the proposed roadway could provide for a bus route connection from Serra Mesa to the existing trolley stops at Rio Vista or Mission Valley Center; however, the bus routes are planned, owned, and operated by MTS and any new route would need to be implemented by MTS. Lastly, no new vehicle trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Moreover, the proposed roadway would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route. No changes to the FEIR are warranted as a result of this comment.

From: Robert <ucsdcb@gmail.com>
Sent: Tuesday, May 30, 2017 7:00 PM
To: PLN_PlanningCEQA
Subject: Project No 265605 - Serra Mesa Community Plan Amendment Roadway Connection Project
Attachments: SMCP-Ammendment-DEIR-SMPG-Final-Response-Letter-May-2017.pdf

Dear Ms. Morrison,

CO-1

I would like to say that I find the Serra Mesa's Planning Group review of Project No 265605 addresses many of the points many people are asking. I would like to know the answers to these questions presented in the attached Serra Mesa Planning Group document as well.

Yet, I still had a few more questions below.

CO-2

1. Has the city reviewed the weight capacity of the Murray Ridge Rd/Phyllis Place Rd bridge that crosses over the 805 freeway for max loading of all 5 lanes with semis fully loaded on the bridge? Also has any seismic estimation been calculated with the same situation of 5 lanes of traffic across the bridge which are all semis fully loaded?

CO-3

2. How much are all the traffic mitigation measures expected to cost for the long term view through 2035? How much of this cost would be covered by the tax payers of San Diego City?

CO-4

3. Will the already built Franklin Ridge Rd from Civita Blvd to Via Alta if and when expanded from the current 2 lane Rd to a 4 lane road, will this be at the expense of the San Diego City tax payers or by whom?

CO-5

5. On page 3-1, Project Initiation, the paragraph which starts "Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states: Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Rd between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreements between the City and the property owners at the time urban development take place on these parcels." With this statement has the City of San Diego conducted a thorough survey and asked each property owner in Civita to see if they are in agreement with this road connection? if the City has conducted this survey what are the results, do the Civita property owners as a majority want this road or do they not want this road?

CO-6

6. The Quarry Falls Project submitted to the City of San Diego on May 11, 2005 had an Alternative 4 which was a connection from Civita to Phyllis Place. this road connection has been a low alternative from the very start 12 years ago, it has not gained popularity since, so why is the city still pushing for this road connection that neither the Mission Valley Planning Community nor the Serra Mesa Planning Community want?

CO-7

7. To get more vehicles from Mission Valley onto the 805 Freeway, why not utilize the existing 8 East on ramp at Texas Street/Qualcomm Way and place a connector from that on ramp to the 805 on ramp? This connection would not need much work as the 8 East to 805 connection parallels the Texas Street/Qualcomm Way on ramp onto the 8 East, this would require much much less work than the Franklin Ridge Rd connection.

- CO-8 | 8. The traffic studies in the recirculated draft EIR show that the vast majority of the 805 freeway traffic is coming from south of the 8 freeway and that is why 805 North is very congested in the morning and then 805 South is very congested in the afternoon/evening, how will placing more traffic onto the already congested 805 freeway make traffic circulation better, it is shown in the EIR that the queue time at the on ramps with all mitigation measures taken will still be over half a mile long and still take 9+ minutes to get onto the 805 Southbound freeway from Phyllis place in the afternoon, how will this make traffic circulation better? Is Caltrans going to be expanding or widening the 805 freeway?
- CO-9 | 9. Why won't the City of San Diego work with Caltrans in a combined effort to tie Mission Center Rd into the 805 freeway where Mission Center Rd goes directly underneath the 805 freeway?
- CO-10 | 10. Besides this proposed road connection, what is the City of San Diego's plan in regards to mass transportation to help Mission Valley with their ever growing population and its transportation needs?
- CO-11 | 11. Will the City appraise homes in Civita and Serra Mesa area prior to and after the road connection and mitigation measures to see the true impact this road and mitigations will have to the property values in these communities?
- CO-12 | 12. Has the Police Department been asked what additional crime they estimate will happen in Civita and Serra Mesa because of this road connection? Will additional police be assigned to patrol Civita and Serra Mesa because of this road connection?
- CO-13 | 13. If this road connection is approved and once built, how will the City of San Diego address panhandling on the corners of this major road connection?

Thank you,
Robert Ruzich

Serra Mesa Planning Group

A Recognized San Diego City Planning Group - Serving the Citizens of Serra Mesa

Post Office Box 23315 San Diego, CA 92193

smpg@serramesa.org

May 18, 2017

RE: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No 265605

Susan Morrison
Environmental Planner, City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Dear Ms. Morrison:

The Serra Mesa Planning Group (SMPG) discussed the Serra Mesa Community Plan Amendment Roadway Connection Project: Draft Environmental Impact Report at our May 18, 2017 meeting and passed a motion to approve this letter. This letter is the result of a careful review of the Recirculated DEIR and recognition of the permanence and far reaching impacts of a roadway connection. Please note that Civita was formerly called Quarry Falls; and City View Church, formerly First Assembly of God. The Reference section at the end of this letter contains information on references in the letter to other documents.

According to state CEQA guidelines, Article 7,15088.5 f(1): (g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR. The Recirculated DEIR states "This revised and recirculated Draft Environmental Impact Report (DEIR) analyzes impacts at a project level to ensure that all potential significant environmental effects associated with the project are disclosed." (Chapter 4)

We note at this time that the half-page (Chapter 4 History of Project Changes) is a very broad inadequate response to our detailed 27-page (June 26, 2016) submittal, that does not meet the indicated CEQA guidelines requiring summarizing (sic) the revisions made to the previously circulated draft EIR.

Listed below are specific questions and comments organized by topics.

Omitted in this Recirculated DEIR:

- Mission Valley Community Plan
 - The Sand and Gravel Re-use Development section (p. 56) states "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan.
 - "Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed." (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

CO-14

- “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (p. 124)

There are inconsistencies within the Mission Valley Community Plan. Aren't amendments needed? Explain how it is acceptable to propose an amendment to the Serra Mesa Community Plan when the Mission Valley Community Plan contains contradiction and needs amending.

- Emergency access exists from Aperture Circle in Civita to Serra Mesa via Kaplan Drive and can be seen in the Addendum, p. 10.
- The completed emergency access and sidewalks at Kaplan Drive provide bicycle and pedestrian access and can be seen in the Addendum, p. 10.
- The developer, Sudberry Properties, has indicated that they would fund the road connection if approved; or if not approved, make improvements to Mission Center Road (described in the Final PEIR for the Quarry Falls Project, p. 11-5). Will this information be added? If not, provide an explanation for the exclusion.

Will each of the above items be added to and discussed in the appropriate areas of the Recirculated DEIR? If not, provide an explanation for the exclusion for each item. For the appropriate items, will the information be used in the analyses and studies? If not, provide an explanation for the exclusion.

Clarification Needed

What other means of reconciling the Serra Mesa and Mission Valley Community Plans have been attempted?

The Final PEIR for the Quarry Falls Project, Figure 5.2-3, and the Quarry Falls Specific Plan, Figure 4-16, show a minimum of one trail between Civita and Phyllis Place Park without the roadway connection. The trail provided by the developer can be accessed by pedestrians and bikers and will provide connectivity to the LRT line. Can you include this schematic? If not, provide an explanation for the exclusion.

Grade

- Provide documentation for the analysis of the grade.
- Can a grading map for the roadway connection (e.g., similar to Figure 3-40, Final PEIR for the Quarry Falls Project) be included? If not, provide an explanation for the exclusion.
- The Recirculated DEIR indicates the maximum grade is 7% (3.3.1.1). However, the Final PEIR for the Quarry Falls Project states “A Preliminary Road Profile Evaluation for the segment of Franklin Ridge Road to Phyllis Place has been prepared by TCB/AECOM that determined the grade of the road would be less than 10%; a deviation from standards has been submitted and conceptually approved by the City of San Diego for Franklin Ridge Road.” (p. 900 of 1042) Also, in the same document the road is described as a four lane Major Street. (p. 10-39) According to the Street Design Manual the maximum grade for a Major Street is 7%. (p. 45) Since a deviation from standards is needed, the road connection must be greater than 7%. Additionally, the developer confirmed in May 2017 that the grade of the road from Phyllis Place to the Via Alta/Franklin Ridge intersection would be just under 10% at the steepest section. Explain the discrepancy in maximum grade analysis.
- Discuss the grade of the roadway connection as it pertains to ADA requirements.

Executive Summary

Refer to the appropriate sections of this letter for comments that would relate to the Executive Summary.

Objectives

The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.

What portions of the Recirculated DEIR address the four charged issues identified in the Resolution?

The objectives that are being used for this Recirculated DEIR are different than the ones used in the DPEIR. These are the ones with substantive changes:

DPEIR	Recirculated DEIR	Change
Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.	Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.	Multi-modal linkage from Friars Road replaces connection from Mission Valley
Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could: <ul style="list-style-type: none"> Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas. 	Improve local mobility in the Serra Mesa and Mission Valley planning areas.	Local mobility replaces overall circulation network
<ul style="list-style-type: none"> Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities. 		Deleted from the Recirculated DEIR

Why were changes made to the objectives?

The following objectives weren't listed in City Council Resolution 304297 (October 2008):

- Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
- Improve local mobility in the Serra Mesa and Mission Valley planning areas.

- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

What is the source for the objectives not stated in the Resolution? Will the source for the objectives be added? If the source isn't added, provide an explanation for the exclusion.

Provide a concise description of the justification for the project.

NOP and Scoping Meeting

The General Plan and Community Plan Amendment Manual, Appendix D, List of Possible Issues, states “Note: this list includes issues that have been previously analyzed in plan amendments, however any issue identified by staff, the public, or a decision maker should be analyzed as well.” Why weren’t the following items, excerpted and quoted, from letters that were submitted by the community mentioned, discussed and/or studied in the Recirculated DEIR?

Project Description: “Since there will be emergency access at Kaplan Drive and pedestrian and bicycle access whether or not the road connection is built, how will a study be conducted? What will be the criteria for analyzing and evaluating improvement?”

Aesthetics: “Substantially degrade the existing visual character or quality of the site and its surroundings? This has been marked as Less Than Significant Impact. Without the road connection there would be a contiguous park. How would a “four lane major artery” with its traffic and noise not have a significant impact on the visual character and quality of the site and its surroundings?”

Air Quality: “What is the grade for the road connection?” “Will it impact the Senior Housing located at San Diego First Assembly of God?” “What is the anticipated amount of time for queuing during peak traffic times?” “How much pollution is expected during this time?”

Hazards and Hazardous Wastes:

“The discussion mentions Faith Community School but it doesn’t mention the Senior Housing at San Diego First Assembly. What would be the potential health risks for the Senior Housing which is not separated by a buffer and includes a vulnerable population?”

“The discussion doesn’t mention the emergency connection at Kaplan Drive that is included in the Civita Development. What benefits and impacts will the Kaplan Drive emergency connection provide? If the road connection were not there, how much extra time is needed to access this connection?”

Public Services:

“The discussion doesn’t include the Kaplan Drive emergency connection. What benefits and impact will the Kaplan Drive emergency connection provide?”

Land Use

According to the Significance Determination Thresholds land use compatibility impacts may be significant if the project would result in “Development or conversion of general plan or community plan designated open space...” (p. 46) Will the Franklin Ridge Road connection traverse through open space? Or will the additional space that’s needed for the park if it is split in two and/or the widening of Phyllis Place require open space land? If affirmative, discuss the significant impact on land use.

The DPEIR referenced consistency with the bicycling goals in the Mobility Element including “A safe and comprehensive local and regional bikeway network”. This Recirculated DEIR doesn’t include the following policy, “Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations.” (Policy ME-F.2.a) Since the roadway connection will create an unsafe situation for vehicles entering and exiting the City View Church driveway and bicycle lanes would be removed if at least six of the mitigations were implemented, discuss the consistency of the roadway connection with this policy. (Note: Since not all of the mitigations are described in detail, it’s hard to determine the exact number of mitigations that would require removal of bike lanes for implementation.)

What criteria was used to determine the project’s consistency with the City of San Diego 2008 General Plan (refer to Table 5.1-1)?

Listed below are the comments to Table 5.1-1, Proposed Project’s Consistency with the City of San Diego 2008 General Plan. The list identifies the items and the appropriate section of the General Plan. Will each of these items be included in the table? Will questions be answered and explanations provided? If not, provide an explanation for the exclusion of any item.

- The Mission Valley Community Plan in the Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t this statement mentioned? (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
- “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (Mission Valley Community Plan, p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan. (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
- “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (Mission Valley Community Plan, p. 124) The road would extend above the 150-foot elevation contour. (Policy LU-C.1.c; Policy LU-D.3; Policy LU-D.12)
- Mission Center Road is a direct connection from Murray Ridge Road in Serra Mesa to Friars in Mission Valley. (Policy LU-C.2.f; D. Plan Amendment Process Goal 1; Environmental Justice Goal 1; Policy LU-I.11; C. Street and Freeway System Goal I; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6)
- Two linkages from Serra Mesa to Mission Valley exist – Mission Center Road and Mission Village Drive. (C. Street and Freeway System Goal II)
- The traffic studies describe an increase in traffic congestion in Serra Mesa. (Policy LU-C.5.c; C. Street and Freeway System Goal III; Policy ME-C.1; C. Street and Freeway System Goal I) Explain how the increase in traffic congestion meets the goal of “Vehicle congestion relief”. (C Street and Freeway System Goal III)

CO-14
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- The primary purpose for the roadway connection, a collector road, is access to I-805. Provide an explanation for how this meets the ME goal of “Safe and efficient street design that minimizes environmental and neighborhood impacts” and ME-C.3 regarding “choice of routes to neighborhood destinations” and “designed to control traffic volumes”.
- The developer will provide a minimum of one trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; F. Bicycling Goal; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7)
- Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. Why wasn’t this considered in the Recirculated DEIR? (C. Street and Freeway System Goal I)
- The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. Why wasn’t this considered in this Recirculated DEIR? (Policy LU-H.6; A. Walkable Community Goal II; A. Walkable Community Goal III; A. Walkable Community Goal IV; A. Walkable Community Goal IV; Policy ME-A.6; C. Street and Freeway System Goal I; F. Bicycling Goal; Policy UD-A.2; Policy UD-B.5; Policy UD-C.6; Policy UD-C.7; I)
- Two park designs (one with the roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park.
 - “The proposed project would somewhat divide the park by placing a roadway in between the two portions of it.” (5.1.4.1) Phyllis Place Park will definitely be split into two with the project. It’s only logical that there would be more safety issues (e.g., children playing ball, flying a kite, etc.). Describe the potential for safety issues. (A. Walkable Community Goal II)
 - Splitting a park into two with a roadway connection will impact the park aesthetically. Why wasn’t this discussed as an impact since the view of the roadway connection from the eastern park portion will be visible on two sides? (Policy UD-C.7)
- What is the maximum grade of the roadway connection?
 - Will this grade impact “grading plans to provide convenient and accessible pedestrian connections”? (Policy ME-A.6)
 - Is this grade superior for emergency access compared to Kaplan Drive? (Street Design Manual)
 - What are the impacts of this grade on ADA requirements? (Street Design Manual)
 - Is this grade suitable for mass transportation? (Street Design Manual)
 - Discuss traffic waiting times and if stopping and starting on such a grade is feasible for mass transportation? (CE-31-32; LU-I.14)
 - Discuss the grade of the roadway connection and the impact a roadway connection will have on the divided Phyllis Place Park (Policy UD-B.5)
- Would a trail accessible to bikers be safer than the Class II bike lanes on the Franklin Ridge Road connection? (F. Bicycling Goal)
- The roadway connection is not a transportation improvement for the existing Serra Mesa development adjacent to the Civita development. It would not provide improved access times to increase or provide benefit for the walking community. (Policy ME-K.4)

- Explain how the proposed project would maximize the public viewshed of Mission Valley, as seen from Serra Mesa when the approved Phyllis Place Park is constructed. (Policy UD-C.6)
- Explain how the roadway connection would reduce congestion when the traffic studies indicate more congestion in Serra Mesa. (Policy ME-C.2)
- “Design new connections, and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations.” (Policy UD-C.6)
- Explain how the roadway connection, which would increase ADTs from 2,420 (existing) to 34,540 (2035) on Phyllis Place would meet the goal of “Minimal excessive motor vehicle noise on residential and other noise-sensitive land uses.” Also, it’s stated that the “City can, however, influence daily traffic volumes and reduce peak-hour traffic by promoting alternative transportation modes.” (Citations from p. NE-9, Noise Element)
- Describe the transit services that would become “more readily available” (5.2.7.3) to those living in the community of Serra Mesa. Bus service is available on Murray Ridge Road and trolley access is available via Mission Center Road. The majority of Serra Mesa residents live closer to Mission Center Road, so traveling further to Phyllis Place would be less convenient. (Proposed Project column for Policy LU-I.11)
- The Street Design Manual contains guidelines for street design. The streets described in this manual don’t seem to fit the roadway connection – number of lanes, ADTs, and grade. Discuss how the design will meet the Street Design Manual guidelines. If the roadway won’t meet the guidelines, discuss the required deviations. Note: Deviations for this roadway connection are mentioned in City Council Resolution 304295, p. 15 of 28 (October 2008).
- The Mobility Element of the General Plan discusses street design. Discuss the pedestrian barrier to the segmented park that the four lane roadway will create. (ME-C.3)
- These statements are extracted from the Mobility Element: “Design roadways and road improvements to enhance and maintain neighborhood character”; “Avoid or minimize disturbances to natural landforms”; “Emphasize aesthetics and noise reduction in the design, improvement, and operation of streets and highways”. Discuss the roadway connection in relation to the above policies. (ME-C.6)
- A goal of the Transportation Demand Management section in the Mobility Element is “Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction.” Discuss the reasons for supporting construction of a roadway and mitigations requiring widening of streets rather than working on improving performance and efficiency of the existing Mission Valley streets and SR-163.
- Final PEIR for the Quarry Falls Project, Statement of Overriding Considerations (p. 109) – “Quarry Falls is consistent with the General Plan which implements the City of Villages Strategy of focusing growth into pedestrian friendly mixed-use activity centers with connections to the regional transit system.” The emphasis in Civita has been on walkability. How does a roadway connection increasing traffic on local streets in Civita fit the City of Villages Strategy?

Listed below are the comments to Table 5.1-2, Proposed Project’s Consistency with the Serra Mesa Community Plan (SMCP). Will each of these items be included in the table? If not, provide an explanation for the exclusion of an item.

- Retain the residential character of Serra Mesa. A roadway connection which will increase the ADTs from 2,420 (existing) to 34,540 (2035) impacts the residential character. (Plan Elements, p. 5 of SMCP)

CO-14
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- Splitting a park into two with a roadway connection will impact the landscape and hillside. (Proposal Street and Highways, p. 41 of SMCP)
- Emergency access via Kaplan Drive in Serra Mesa which is located adjacent to Civita housing exists. (Proposal – Fire Protection, p. 25 of SMCP)
- The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access. (Parks & Recreation Element Goals, p. 18 of SMCP)
- The developer will provide a minimum of one trail between Phyllis Place Park in Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Proposal – Bicycles Routes, p. 42 of SMCP; Parks & Recreation Element Goals, p. 18 of SMCP)
- “To provide a safe, balanced, efficient transportation system with minimal adverse environmental effects.” The roadway connection will adversely impact the environment. (Transportation Element – Goals, p. 41 of SMCP)
- Phyllis Place Road is required to be widened. This conflicts with “Street widening and other improvements should be minimized...” (Transportation Element – Proposals Streets and Highways, p. 41 of SMCP)
- Two park designs (one with the roadway connection and one without the roadway connection) for Phyllis Place Park have gone through the design approval process and the Park Development Agreement, p. 2, requires construction of the park.
 - Splitting a park into two with a roadway connection could create a safety issue. (Objective – Physical Environment-Urban Design, p. 50 of SMCP)
 - Splitting a park into two with a roadway connection will impact the park aesthetically. (Objective – Physical Environment-Urban Design, p. 50 of SMCP)
- Will the roadway connection traverse through open space? Or will the additional space that’s needed for the park if it’s split in two or the Phyllis Place widening mitigation require open space land? If affirmative, explain how this would meet the goal that “Open space should be preserved.” (Environmental Management Element, p. 48 of SMCP)
- An objective is “To designate Multiple Species Conservation areas, canyons and hillside for preservation as open space and for strictly controlled utilization for the enjoyment of this generation and in perpetuity.” Also, listed in the Proposals is “Steep hillsides and canyons should be protected and preserved in a natural state. Where development is permitted, very low-density urbanization should occur. Natural features should be enhanced and areas of high scenic value and environmental sensitivity conserved. This proposal can be implemented with steep hillside guidelines, open space zones and PRD which is in character with the surrounding neighborhood.” Explain how a roadway connection meets the objective and proposal of the community plan. (Environmental Management Element, p. 48 of SMCP)

5.2 Transportation/Circulation and Parking

Data

Data Collection

- The Notice of Preparation meeting was held in February 2012. True Count conducted event counts for intersections in May 2012, November 2012 and in May 2013. MetroCount Traffic Executive conducted the segment count in June 2011 (prior to the NOP). Pacific Technical Data prepared the intersection turning movement counts in May-June 2013. Katz, Okitsu & Associates conducted the peak hour intersection and arterial analysis in April 2012. Koa Corporation confirmed the data in 2013 and prepared the Traffic Impact Study in 2015 for the 2016 PEIR. Chen Ryan is the preparer for this 2017 Recirculated DEIR. Given that there have been multiple consulting companies involved in the data collection and analysis and actual counts are based on either 2011, 2012, or 2013 data, discuss the validity of this Traffic Impact Study.
- The Traffic Impact Study Manual states that “The count data used in traffic impact studies should be no more than two years old. If recent traffic data is not available from the City, current counts must be made by the consultant.” (p. 10) Discuss this guideline in relationship to the count data that was collected more than two years ago. If the data is deemed “too old”, will a new study be conducted and this Recirculated DEIR updated to reflect the new data?
- Describe the procedure used to determine the near-term data.
 - Is the near-term data for intersections based on the data collected in 2011 and/or 2013?
 - If the near-term data for intersections is based on the 2011 data, were projects developed after 2011 included in the analysis? If so, provide the name and size of these developments.
- These questions are appropriate if data collected in 2011 and/or 2013 was used as a basis for the near-term data.
 - Were the traffic studies in 2011 and 2013 conducted when school was in session?
 - Were they conducted at the same period of time of the day and on the same day of the week?
 - What method was used for traffic volume count?
 - Why weren't other methods selected, e.g., automatic method which could provide 24 hours of the day and all days of the week recording at multiple locations? Would this type of study provide better data for long term projections?

If there is inconsistency in the study conditions between the two sets of studies, is the data valid? If yes, provide an explanation for validity. If no, will the study be redone?

- Near-Term 2017 baseline traffic conditions inaccurate and incomplete: The Traffic Impact Study includes traffic volumes in 3 scenarios: Existing Conditions 2013, Near-Term 2017, and Long-Term 2035. The study uses the comparison of Near-Term Baseline with No Project and Near-Term with Project to identify significant traffic impacts. While the data for 2013 Existing Conditions were obtained through machine data collected in the field in 2011 and 2013 (Appendix C, 2017 Traffic Impact Study, Chapter 3, Section Existing Traffic Volumes), the data for the 2017 Near-Term conditions was estimated. The estimation was done with a SANDAG computerized travel forecast model. “City Staff also accounted for all known and proposed development projects that were not otherwise accounted for in the model that would affect the study area ... Poor model performance in the base year when compared to existing counts resulted in spot adjustments throughout the study area in both the “With” and “Without Project” scenarios.” (Appendix C, 2015 Traffic Impact Study, Chapter 4, p. 24).

CO-14
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- Why should any results of this model be trusted if the model already showed obvious poor performance in some predictions that required post-model adjustments? How can one affirm that the model predictions that are not obviously wrong are accurate?
 - What were the known and proposed development projects that were included in the model?
 - Are there any projects that weren't included?
- Near-Term 2017 baseline traffic conditions inaccurate: The Recirculated DEIR states "It is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented." (Recirculated DEIR, 5.2) There are multiple major developments planned for the area (refer to Recirculated DEIR, Table 6.1) that can significantly impact the amount of traffic in Mission Valley, how can the report estimate a baseline into the future when traffic conditions are rapidly changing and authors don't know when the road would be built?
- Appendix C Traffic Impact Study for the Serra Mesa Community Plan Amendment Roadway Connection Project dated January 2017 differs from the Appendix C Franklin Ridge Road Connection Traffic Impact Study, dated January 2015. For example, in Appendix C (2017), p. 79; and in Appendix C (2015), refer to p. 54. Both of these tables are titled Significant Impact Comparison – Long Term (2035) vs. Existing Conditions (2012) and have the same header and footer (except for the page number) but some of the information on the page is different. The 2017 traffic analysis was conducted by a different company. There isn't any indicator on this page that this information was changed by another company. Has any significant data been changed? Also, the first company has a professional seal on their Traffic Impact Study. There isn't a seal for the second company. Discuss the significance of a seal and the lack of a seal.
- How does this data compare to what was predicted for the Quarry Falls Project, Phase 1?
- When the data was collected for the Traffic Impact Study did it consider the activities of City View Church? If not, will they be included? If no, provide an explanation for the exclusion.
- Was the future school on Via Alta considered in the studies and analyses? Children will be crossing the roadway with close to 35,000 cars per day. What will be the impacts? How will impacts be avoided?
- Methods and Assumptions –
 - Phase 1 of SR-163 and Friars Road Interchange Project is scheduled for construction in 2017. SR-163 provides access to I-805 and is promoted on the City's website as "This project will alleviate some of the severe traffic delays along Friars Road due to new development in Mission Valley." Will this information be added and studied? If not, provide an explanation for why SR-163 with the improvements wasn't studied or discussed.
 - "...the cumulative impact analysis evaluates the long-term cumulative impacts projected to occur when the Serra Mesa Community Plan reaches full planned buildout, which is anticipated to occur by the year 2035." (5.2-18) Serra Mesa is impacted by all of the development in Mission Valley. What would be the results if the cumulative impact analysis included the long-term cumulative impacts projected to occur when the Mission Valley Community Plan reaches full planned buildout?
- Why wasn't the intersection of Mission Center Road and Sevan (located in Serra Mesa) included in the Traffic Impact Study? This intersection is the entrance into the Hye Park condominium complex, which includes no protected left turns from Sevan Court to Mission Center and no protected left turns from Mission Center to Sevan Court. There is no traffic signal at this intersection for turning during peak traffic hours. Will this intersection and the traffic impacts be studied and added to the traffic analysis? If not, provide an explanation for the exclusion.

CO-14
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- The freeway off-ramps weren't analyzed in the Traffic Impact Study. Provide an explanation for their exclusion.
- Sandrock Road became a two lane collector with a continuous center lane in 2014. Do the near-term conditions account for the change of Sandrock from four to two lanes? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
- Broadstone Corsair, a 360 unit multifamily housing project, located at the corner of Aero and Sandrock, opened in 2015. Was the traffic from this project factored into near-term and long term conditions? If not, will the analysis be revised? If it won't be revised, provide an explanation for the exclusion.
- The previous DPEIR included the roadway segment of Friars Road between River Run and Fenton Parkway. Explain why this segment has been removed from this Recirculated DEIR. (5.2.1.1)
- Civita has constructed over 1,600 units. Was an assessment or survey made of the traffic patterns and activity of residents within Civita? If yes, what were the results? If not, provide an explanation for the exclusion.
- Traffic generated by events at Qualcomm Stadium during event time wasn't included in the studies. Will it be included? If not, provide an explanation for the exclusion.
- The Aquatera Drive to Murray Ridge Road segment of Mission Center Road is listed as a 2-lane Collector with no fronting property. Hye Park is a 103 unit condominium complex facing Mission Center Road at Sevan Court between Aquatera and Murray Ridge. Will the information on the table and everywhere else be corrected? If not, provide an explanation for the exclusion.
- In Appendix G of Appendix C Traffic Impact Study, there are charts labeled "51:Via Alta &" but there aren't any charts labeled with "Via Alta & Franklin" for 2035 with/Project. Where is the data that has been used for the analysis of Via Alta & Franklin?
- Were the improvements/mitigations that are required for the approved Mission Valley projects included in the traffic analysis? If not, what would be the impact of these improvements/mitigations on the traffic analysis?
- This Traffic Impact Study has not studied as many road segments and intersections as in Final PEIR for the Quarry Falls Project, which studied the road connection as an alternative at that time. Provide an explanation for the difference in limiting the road study perimeters.

Data Analysis

- Do the delays at the I-805 NB and SB ramps (PM) mean there will be queuing that will extend into the residential streets? Will queuing be discussed? If not, provide an explanation for the exclusion?
- I-805 NB Ramp
 - The ramp meter data on Table 5.2-18 doesn't include Murray Ridge I-805 NB Ramp (PM). However, it includes the I-805 SB Ramp (PM) 31 minutes delay In the KOA Corporation study the I-805 NB Ramp (PM) is displayed as 43 minutes delay. Explain why this data wasn't included in the analysis.
 - Table 7-4, Appendix C, Long-Term (2035) with the Connection – The data for I-805 NB ramp at Murray Ridge Road shows 43 minutes of delay (PM) and the I-805 SB ramp at Murray Ridge Road shows 31 minutes of delay (PM). Currently, in the PM there is a bigger delay at the SB ramp rather than the NB ramp. Provide an explanation.

- For intersections with connection long-term “Franklin Ridge Road/Phyllis Place – LOS F (PM)” stated on page 60 of the KOA Corporation Traffic Impact Study contradicts Table 4-2 of the Chen Ryan study which indicates the LOS is B. Explain the contradiction.
- Inaccurate LOS in Table 5.2-8: According to Table 5.2-7 any V/C in the 0.9-1.00 range is designated LOS E (unacceptable). However, Table 5.2-8 cites LOS D (acceptable) on 3 of those entries: (1) Mesa College Dr on-ramp to SR-163 AM, V/C = 0.916, (2) SR-163 to Mesa College Dr on-ramp PM, V/C = 0.909 and (3) Murray Ridge Rd to I-8 PM, V/C = 0.903. While this LOS table is used only as a reference other LOS tables are not. Will this and similar mistakes in all LOS tables be corrected?
- Inaccurate LOS in Table 5.2.10: Phyllis Place between Abbotshill Road and Franklin Ridge Road is shown as LOS A in the Near-Term with Project, but it should be LOS F. Residents leaving the Abbotshill area will drive this segment and meet the next segment (Phyllis Place between Franklin Ridge Road and I-805 SB ramp) that has LOS F. With the next segment being congested cars will start lining up west on Phyllis Place back into the Abbotshill area, so Phyllis Place between Abbotshill Road and Franklin Ridge Road will effectively become an LOS F. Since Phyllis Place is the only road to exit the Abbotshill area, this creates a significant traffic hazard for that neighborhood. Will the LOS of Phyllis Pl between Abbotshill Rd and Franklin Ridge Rd be adjusted to show the actual expected level of service? If not, provide an explanation.
- Section 3.3.1.2 of the DEIR states that the proposed intersection will be a signalized intersection. What is omitted is if the signal will have a pedestrian capability. It might be assumed that it does since it has crosswalks. The addition of crosswalk signaling on the traffic flow is not analyzed although it seems to be implied. The distance between the proposed intersection with Phyllis Place and the signal light at the I-805 SB ramp (the west end of the bridge) is about 650 feet. This distance is less than the worst case queue length of 3,112 feet as listed in Table 5.2-12. This can effectively lock out Phyllis Place residents from getting on to the I-805 SB ramp unless the lights are synchronized and there is a "No Right Turn on Red" implemented at the light to prevent keeping the queue full from cars coming up through the Franklin Ridge Rd connector. Will this be addressed in the traffic analysis? If not, provide an explanation for the exclusion?

Vehicles Miles Traveled Data (VMT)

- Project Influence Area
 - Explain how Traffic Analysis Zones are determined. Is the increase or decrease in ADTs on freeway mainline segments, roadway segments, and/or freeway ramps considered?
 - According to Appendix H (p. 3 of 8) SANDAG Series 12 ADT was used to determine the project influence area by comparing the Year 2035 with Project conditions to Year 2035 without Project conditions. Incorrect information in the SANDAG Series 12 Data, Forecast Year 2035 at the Transportation Forecast Information Center includes:
 - Sandrock Road is classified as 4 lanes but was restriped as two lanes.
 - Murray Ridge Road is classified as 4 lanes but was restriped as two lanes.
 - Franklin Ridge Road south of the Via Alta/Franklin Ridge intersection isn't included.
 - Franklin Ridge Road segment between Phyllis Place and Via Alta (street name is misidentified as Murray Ridge), which isn't approved, is shown; inclusion of a road can't be based on information from a community plan because the extension of Tierrasanta Boulevard (shown in their community plan) isn't shown on the map.

Why does SANDAG have inaccurate information? Explain why the unapproved Franklin Ridge roadway connection has been included in the data, but not the Franklin Ridge Road section from the Via Alta intersection to Civita Boulevard?

Was the above inaccurate information used for the VMT analysis? If affirmative, what would be the impact of the corrected information on the VMT analysis?

- If it includes roadway segments, the project influence area doesn't include all of the roadway segments in Serra Mesa which would increase or decrease by more than 500 ADTs that are identified in the Traffic Impact Study.
 - Explain the inconsistency in the data.
 - Will the VMT study be rerun to include the excluded roadway segments and the evaluation included in this Recirculated DEIR? If not, why not?
- The Project Influence Area doesn't include the same area that was studied in the Traffic Impact Study (e.g., excluded Qualcomm Stadium area). Discuss the inconsistency between the data used for the Traffic Impact Study and the data used for the VMT study.
- Table 1 (Appendix H)
 - Data is provided for 2013, Near Term (2017), and Long Term (2035). How was the data obtained for 2013, 2017, and 2035?
 - If the 2013 data was used for a baseline, does the 2017 data include the development that has occurred since 2013?
 - If the 2013 data was used for a baseline, does the 2035 include all of the proposed and/or approved Mission Valley developments?
- The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, "Building new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, *typically induces additional vehicle travel*. For the types of projects indicated previously as likely to lead to additional vehicle travel, an estimate should be made of the change in VMT resulting from the project." (p. III.32, emphasis added)
 - Based on the above, why does the Recirculated DEIR suggest that the proposed road connection will decrease VMT from its baseline level?
 - What was the basis for the "Baseline" VMT fed into the CARB's EMFAC model output as shown by Table 5.10-4 in the Recirculated DEIR? What relevance does that number have to the known VMT levels in the regions affected by the proposed road connection?
 - On what basis -- other than the programming of the EMFAC model -- is the proposed road connection expected to reduce (rather than increase) VMT in affected regions? What verified and validated estimates of either baseline VMT or expected extent of changes in VMT (if any) are available?
- Induced VMT

Proposed project contradicts Senate Bill No. 743: The project's new road and the mitigations proposed in this Recirculated DEIR will only partially help traffic flow in the short term. "Ironically, even "congestion relief" projects (i.e., bigger roadways) may only help traffic flow in the short term. In the long term they attract more and more drivers (i.e., induced demand), leading not only to increased air pollution and greenhouse gas emissions, but also to a return to congested conditions." (Updating Transportation Impacts Analysis in the CEQA Guidelines, Senate Bill No. 743, p. 5)

Discuss the contradiction between Senate Bill No. 743 and the roadway connection.

Discuss how the roadway connection will provide a sustainable solution to the traffic issues currently suffered by Mission Valley and additionally new ones in Serra Mesa.

CO-14
cont.

The Recirculated DEIR states “By providing a new roadway connection, the project may affect future vehicle circulation on local roadways and freeways, as motor vehicle would reroute their future trips based on the new roadway connection. As such, the new roadway connection would introduce new trips to the project area that currently use an alternative route, thereby affecting, and potentially reducing, traffic volumes on existing surrounding roadways.” (5.10.3.2)

Serra Mesa is known as a pass through community – people use Serra Mesa roadways to reach other areas (e.g., Kearny Mesa, I-805, Mission Valley). Here are a few examples:

- Since there isn’t access to I-805 N from the hospital complex in the Birdland area, there are employees who travel on I-805 S, exit at Murray Ridge, go across the bridge on Phyllis Place in Serra Mesa, and access I-805 N.
- People employed at the state building on Metropolitan Drive in Mission Valley access I-805 via Mission Center Road, Murray Ridge Road, and Phyllis Place or I-15 or Kearny Mesa via Mission Center Road, Murray Ridge Road, and other local streets (multiple routes available).
- People traveling to stadium events use I-805, exit Murray Ridge, and travel the other local streets (multiple routes available) in Serra Mesa to reach the stadium.
- To avoid Friars Road congestion people travel Mission Center Road and the local streets in Serra Mesa to reach their destination (e.g., I-805, Kearny Mesa, I-15, Tierrasanta, etc.).

The Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA states that

- “With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT...” (p. III:28) The changes which are applicable to the roadway connection include longer trips and route changes. Refer to the Texas Street example under Impacts in this letter.
- “Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that results from vehicle travel.” (p. III:34)

The roadway connection could potentially result in Induced VMT. Refer to Appendix H: E/E VMT wasn’t included in the total VMT.

Discuss the impact on VMT if vehicles drive north from Mission Valley via the Franklin Ridge roadway connection to access I-805 SB. Will these vehicles add more miles to their trip than without a roadway connection?

In relationship to the discussion in this VMT section:

- Does E/E VMT refer to Induced VMT?
- If not, was an analysis made of Induced VMT?
- If affirmative, what method was used?
- If not, what would the result be if induced VMT were included?
- Considering the discussion and evidence for including Induced VMT, will it be included in this Recirculated DEIR? If it won’t be included, provide an explanation for the exclusion.

Mitigations

The statements in this section use the phrase “shall be”. If this document is certified by the City Council, will the description of the road changes that occur after the phrase “shall be” be required to be implemented? If not, will a clarifying statement be included that describes the process for implementation?

These mitigations have for the most part the same description: MM-TRAF-1 and 9; 2 and 10; 3 and 11; 4 and 12; 5 and 15; 6 and 16. Why are there different mitigation designations for the same mitigation description? It's confusing!

MM-TRAF-1 and MM-TRAF-9, Murray Ridge Road from Mission Center Road to Pinecrest Avenue, was addressed and resolved in the Final PEIR for the Quarry Falls Project, certified by the City Council. Explain why it's appropriate to reintroduce this mitigation.

In 5.2.4.3 and 6.3.2.5 the mitigation for MM-TRAF-3, Phyllis Place from Franklin Ridge to I-805 SB ramps, states Phyllis Place shall be widened. This differs from the statement MM-TRAF-11, Phyllis Place from Franklin Ridge to I-805 SB ramps, which states that Phyllis Place shall be reconfigured. There's a contradiction. Which is the correct statement? If reconfigured is being proposed, discuss the width of the road.

MM-TRAF-4 and MM-TRAF-12 indicates that "Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. The new classification for this segment of Phyllis Place will be a four-lane Collector." (p. 5.2-27 and p. 5.2-40, respectively) However in the Executive Summary section MM-TRAF-4 and MM-TRAF-12 are each classified as a Major Arterial (p. S-6 and S-9, respectively). Will the discrepancy be corrected?

MM-TRAF-5 and MM-TRAF-15 lack a specific description of the proposed restriping and widening of the NB on-ramp approach. Provide a detailed description.

MM-TRAF-6 and MM-TRAF-16 lack a specific description of the widening of approaches. Provide a detailed description of the SB ramps.

Table 10-8 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan With Phyllis Place Road Connection:

- Which mitigation(s) in the Recirculated DEIR are ones that are not listed in Table 10-8?
- Are there mitigations listed in Table 10-8 but not considered in the Recirculated DEIR that would impact traffic congestion? Were these traffic improvements considered in the traffic impact analysis? If not, provide an explanation for not including them in the analysis.

Table 11-1 in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (without roadway connection):

- Which mitigations won't be completed and/or be the responsibility of the developer if the roadway connection is approved?
- When the traffic analysis was conducted did it include the identified mitigations that won't be completed and/or be the responsibility of the developer? If it included them, what would be the impact on the analysis if they were excluded?

Impacts

The City Council Resolution 304295 (October 2008) for the Quarry Falls Project includes this statement: "Encourage the use of public transit modes to reduce dependency on the automobile." (p. 3 of 28) How does a roadway connection whose main purpose is to provide access to I-805 fulfill the finding to reduce dependency on the automobile?

The statement is made that "...and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley, that would improve access in the area."

CO-14
cont.

- It isn't mentioned that Mission Center Road provides a direct link with Serra Mesa and Mission Valley. Will that statement be added? If not, provide an explanation for the exclusion.
- The studies indicate that there will be added traffic in Serra Mesa. Explain how efficiency and accessibility would improve with the added traffic.
- This Recirculated DEIR has identified traffic impacts during peak hours that will essentially divide the community by making it very difficult for residents of the Phyllis Place area to easily access other parts of Serra Mesa. Will this impact be discussed? If not, include an explanation for the exclusion.

Surrounding Serra Mesa streets will be impacted when there's traffic congestion. Alternative routes weren't studied: Raejean and Greyling Drive for Murray Ridge Road and Afton for Sandrock. Will an analysis be conducted and included? If not, provide an explanation for the exclusion.

The data indicates with the roadway project that the delay at the Mission Center/Murray Ridge intersection will improve and the ADTs for the segment of Mission Center Road from Aquatera Driveway to Murray Ridge will decrease (the LOS remains F without and with the project). The data didn't consider the required improvement to Mission Center Road from I-805 to Murry Ridge Road that's described in the Final PEIR for the Quarry Falls Project, Transportation Phasing Plan (p. 11-5), if the roadway connection is not approved.

- In the Recirculated DEIR it's indicated that the mitigation measure to widen Mission Center Road from Aquatera Driveway to Murray Ridge Road is unlikely and the impact considered significant and unavoidable. Was a structural evaluation made by either a City engineer and/or by Caltrans to assess the feasibility of the widening of the Mission Center Road in the area of the I-805 bridge? If not, provide an explanation for the exclusion. If the evaluation was conducted, provide the documentation from the engineer. The mitigation for widening Mission Center Road between the I-805 bridge and Murray Ridge Road was not deemed unlikely in the Final PEIR for the Quarry Falls Project.
- How much MHPA area would be impacted by the widening of Mission Center Road from I-805 to Murray Ridge? There wasn't any discussion of an impact on MPHA for the Mission Center Road widening in the Final PEIR for the Quarry Falls Project.
- If it is feasible to widen Mission Center Road, what would be the LOS condition for the Murray Ridge/Mission Center intersection without the roadway connection but with the improvements? If this data isn't included, provide an explanation for the exclusion.

The impacts of each of the mitigations have not been studied. Will mitigation impacts be studied? Here are some examples:

- Discuss the impacts of widening the NB on-ramp (MM-TRAF-15) and the widening of the EB approach, SB on-ramp, SB off-ramp (MM-TRAF-16).
- There isn't any discussion on the impact of the roadway connection on existing parking spaces. A 1.3 acre park without a parking lot will be constructed next to the roadway connection and Phyllis Place. The only available parking is street parking. The park guidelines indicate "No on-site parking, except for disabled access." Will the parking spaces adjacent to the park be removed? If affirmative, discuss the parking impact, especially for disabled access.
- Bikes
 - If the roadway connection is approved and implemented, existing Class II bike lanes on Serra Mesa streets could be impacted. Will a discussion of the impact on existing Class II bike lanes be included in this section? If it is not added, provide an explanation for its exclusion.
 - There are mitigation measures that require the removal of bike lanes (e.g., Murray Ridge Road). If any of these mitigation measures were approved, provide a discussion of compliance with the Bicycle Master Plan.

- It's indicated that Phyllis Place from the I-805 SB ramp to the I-805 NB ramp "shall be restriped to accommodate a total of five lanes." (Refer to Addendum, p. 11-12)
 - The California Log of Bridges on State Highways, p. 52 of 71, indicates that the width (referring to out-to-out width) of the bridge is 24.4 m (80.05 feet). What is the width from curb to curb of the bridge?
 - Will there be bike lanes on the bridge?
 - According to the City's Street Design Manual, p.45, a four lane major street with bike lanes and center median requires 76 foot curb-to-curb. What would be the width of 5 total lanes? What would be the width of 5 total lanes and bicycle lanes?
 - The state's Highway Design Manual indicates that "The minimum width of a bridge sidewalk shall be 6 feet." (p. 200-41) Will the design include 6 feet sidewalks on both sides of the overcrossing?
 - Provide a diagram showing the bridge 5 lane configuration. If not, provide an explanation for the exclusion.
 - Will the overcrossing meet the required state highway design manual? If not, explain any design exceptions.
 - Since the bridge will be restriped to add additional lanes has an analysis been conducted to determine the capability of the I-805 bridge to withstand the added stresses of maximum tonnage of cars queuing and their engines vibrating on the bridge at peak times been done? If not, provide an explanation for the exclusion.
 - Will the reconfigured road meet the City's design standards? If there are any exceptions, what are they?
 - In the Final PEIR for the Quarry Falls Project Transportation Phasing Plan, #8b Murray Ridge Road Bridge over I-805, it states "Prior to the issuance of any building permits for Phase 1, the applicant shall assure by permit and bond the restriping of Murray Ridge Road/Phyllis Place, between the northbound and southbound ramps to I-805 ramps, to 5 lanes, satisfactory to the City Engineer." (p. 11-4) The Murray Ridge Bridge, as viewed in the p. 10 of the Addendum, shows 4 lanes and Civita (Quarry Falls) has been issued building permits.
 - Provide an explanation for the non-implementation of this improvement.
 - If implementation isn't possible for any reason, will this item be removed as a mitigation measure?
 - If it is removed, discuss the impact of the removal on the analysis?
 - The City has embraced Vision Zero: No loss of life is acceptable. One of the focuses is engineering safe street design.
 - With the roadway connection ADTs will increase from 10,770 (existing) to 24,037 (long term) and ramps will be widened. Discuss this impact of increased traffic and widened ramps on pedestrian safety and in relationship to Vision Zero.
 - Without the roadway connection ADTs will increase from 10,770 (existing) to 14,570 (long term). Will there be less of an impact on pedestrian safety with the connection versus without the connection?
- The statement is made "...Phyllis Place shall be widened from Franklin Ridge to I-805 SB to accommodate 5 total lanes..." and that it would be designated as a five lane major arterial. What is a major arterial? Is it the same thing as a primary arterial? The street design manual describes six lane primary arterials and four lane major roads.

- How wide is a 5 lane major arterial? Provide the physical dimensions for Phyllis Place. Phyllis Place is not wide enough (approximately 40 feet wide) to reconfigure to 5 lanes.
- How many feet need to be added to make this a major arterial?
- Would bike lanes be added?
- Would sidewalks be added?
- Include a cross-section of the 5 lane design.
- Discuss the impacts of widening. Would widening Phyllis Place impact the approved park?
- There are two curves – one located west of the City View Church’s western driveway to the single family residences and one located east of the City View Church’s eastern driveway to I-805 ramps. It’s mentioned in sections 3.3.1.2 and 5.2.6.1 that there’s a “slight curve along Phyllis Place from the I-805 ramps”. This curve is not slight. What is the radius of each of the curves? (Refer to Addendum, p. 8)
- A roadway connection increases the ADTs on Phyllis Place to 34,540 (2035).
 - This applies if Phyllis Place will be designated as a primary arterial. According to the Street Design Manual a primary arterial is described as “A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movement. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property.” (p. 126) Also, it’s stated that “Should a lot have frontage only on a primary arterial, driveway access limited only to right turns in and out will be permitted at locations and under conditions specified by the City Engineer and may require an additional lane. (p. 122)
 - If either bike lanes or sidewalks aren’t being added to Phyllis Place, discuss how this mitigation would fulfill the project objectives and meet the description of a primary arterial?
 - City View Church is an abutting property with access. Discuss the contradiction with the description of a primary arterial.
 - Will vehicles exiting City View Church be required to make a right turn only? If so, this will greatly impact the residential area located west of Phyllis Place unless the vehicles are allowed to make a U-turn at the Franklin Ridge/Phyllis Place intersection.
- Discuss this mitigation in regards to meeting the project objectives:
 - “Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.” Given the blind curve and downhill travel of westbound vehicles from the I-805 southbound off-ramp, discuss how a safe transportation system will be created on Phyllis Place when the ADTs increase from 2,420 (existing) to 34,540 (2035).
 - If bike lanes and sidewalks are not being included, provide a discussion regarding “Improve local mobility...”
- “...the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient.” (5.2.6.1) In reference to MM-TRAF-19, relocating the City View Church driveway, “...this analysis assumes that the mitigation measure would not be implemented.” (8. 1.1)

CO-14
cont.

- If MM-TRAF-19 isn't implemented, would the project meet the project objective to "Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts."?
- Since MM-TRAF-19 is located on private property discuss the procedure for and cost of implementing the mitigation.

Will the above items be added to the Recirculated DEIR and discussed in the appropriate area? If not, provide an explanation for the exclusion.

A dog park is located at the top of Via Alta. Will it be a safe place to walk dogs and cross the street with close to 21,000 cars a day?

If the proposed Franklin Ridge access road was extant, vehicles traveling from North Park and University Heights to I-805 will probably choose the Franklin Ridge Road route. It's shorter than alternate routes by 1 mile, it's direct, and there's no access from Texas and Qualcomm to the I-805 entrance. The adjacent image is extracted from the Final PEIR for the Quarry Falls Project, Figure 3.3.



Will the traffic from the Texas Street area be included in the study and the impact considered? If not, provide an explanation for the exclusion.

The following table shows an analysis made of the impact of the connector street on Raejean Avenue - East refers to heading towards Greyling Drive and West is heading towards Murray Ridge Road.

	2035 Peak Flow in Vehicles/Hour		
Time	Connector	W/out Connector	Diff (With-W/out)
East AM	100	95	+5
West AM	190	185	+5
East PM	210	205	+5
West PM	150	145	+5

There's an increase in traffic flow with the connector. The data supports the need for more analysis of alternative routes in Serra Mesa. Will this analysis be included or additional traffic studies be conducted and discussed in the pertinent areas of the Recirculated DEIR (e.g., impacts)? If not, provide an explanation for the exclusion.

For each of the mitigation measures, indicate who will be the responsible party – cost and implementation.

The state CEQA Guidelines define feasibility as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." (p. 5.3) Of the 19 mitigation measures listed:

- 8 of the measures (MM-TRAF-1, TRAF-2, TRAF-8, TAF-9, TRAF-10, TRAF-13, TRAF-14, TRAF-19) include this statement: "Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable." In six of these mitigations the footnote in Table ES-1 indicates that these mitigations would conflict with the City's land use and mobility policies. Consequently, the statement implies that these mitigations may never be completed.

CO-14
cont.

The information that is listed under these 6 mitigations does not include the complete statement that is listed in very small print in the Table ES-1 footnotes, p. 31-32. For example, “¹Implementation of this measure would reduce the impact to a level below significance; however, the City’s ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City’s General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.” The cited statement explains what is meant by countervailing considerations and why implementation is unlikely. While Footnote 2, 3, and 4 are worded a little differently, the same is true for them. *The entire statement from the footnote should be included in the description for each of these 8 mitigations. If it isn’t included, provide an explanation.*

- 6 of the measures describe at least one street/ramp that needs widening (MM-TRAF-3, TRAF-5, TRAF-6, TRAF-7, TRAF-15, TRAF-16) Any widening project will be costly and may never be completed.
- 1 of the measures (MM-TRAF-18) requires a fair share contribution for an additional ramp lane, probably costly.
- 3 of the measures (MM-TRAF-4, TRAF-11, TRAF-12) are restriping projects and could be more easily completed.
- 2 of the measures (MM-TRAF 15 and TRAF-16) provide only partial mitigation; these mitigations are listed as Significant and Unavoidable.

Consequently, 8 of the measures may never be completed. 7 measures are going to be costly. 3 out of the 19 could be completed, and 10 of the measures are listed as Significant and Unavoidable. Will a chart analyzing the feasibility of the mitigations be included?

The following statement is used with eight of the mitigations: “Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.” Does this mean that these eight mitigations weren’t used in determining the data for “with project with mitigations” charts? If the mitigations were included, will another chart be added that shows “with project with feasible mitigations”?

The statement regarding necessary emergency access points (p. 5.1-19) contradicts the following statement: “There is limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple access or egress routes.” (p. 5.2-48) Explain the contradiction.

The Climate Action Plan discusses reduction in GHG emissions from transportation and expanding alternative transportation choices. A bicycle and pedestrian access exists at Kaplan and at least one trail is required to be constructed with bicycle and pedestrian access. Discuss the roadway connection in relationship to the Climate Action Plan.

Currently, numerous vehicles of residents of Civita create parking problems by encroaching and using up already limited space for the local residents. The roads impacted are: Ainsley Road, Ainsley Court, Polizzi Place, Kaplan Drive, Harton Road and Harton Place. The possible reasons are Civita residents using their garages for storage, convenience or easier to park on the street rather than parking on their project streets, too many vehicles with insufficient parking within Civita, and/or vehicles too large for their garage. A roadway connection will make it easier for people to park on the streets in Serra Mesa. This item wasn’t discussed. Will parking on Serra Mesa streets be impacted? If affirmative, will parking impacts be studied? If not, provide an explanation for the exclusion.

“Would the project substantially alter present circulation movements include effects on existing public access to beaches, parks, or other open space areas?” (5.2.7.2) The roadway connection has the potential for altering circulation movement by encouraging vehicles to travel through Serra Mesa for access to I-805 and Kearny Mesa. Discuss the change in circulation.

Community Access – Two reference points were selected (one at the top of the north end of the connection and the other at the south end between Friars and Qualcomm Way). The times for each of these points to the amenity were averaged.

- What would be the impact if the results weren’t averaged? Will this information be added? If it is not added, provide an explanation for its exclusion.
- Why isn’t the data being presented individually for each community – Serra Mesa and Mission Valley?
- Where is the data that was averaged? These times do not seem possible and do not make sense. Explain where and how the data was collected and analyzed.

Community Access – Refer to Appendix J of Appendix C

- If the freeway and surface columns are intended to add up to equal the distance column, the data is incorrect for the Point A table; and wrong in one row in the Point B table. Will this information be corrected? If not, provide an explanation.
- What is the logic behind averaging the time between two points for the hospitals, fire stations, schools, and library, and shopping centers and then summing them? For example - Why not use one representative hospital, e.g., Sharp Hospital? Why would the closest facility not be analyzed? Why is it pertinent to get to the farthest facility from a location? Provide documentation that this is a valid method for analyzing accessibility. If this is not a valid method, will the analysis be redone and included? If not, provide an explanation for the exclusion.
- Is there a fire station planned for Civita (reference San Diego Future Quarry Falls)?
- The data doesn’t appear to take into account the freeway impacts in Serra Mesa if the roadway connection was approved. The freeway data didn’t change in the tables. If the impacted freeways were considered, what would be the data? Would it take longer to get to facilities with traffic even when the facility is closer by distance?

In Appendix C, Traffic Impact Analysis, Chapter 8, Bus Service, p. 71, it was stated that “In the future MTS could take advantage of a new road connection using Franklin Ridge Road to introduce bus service between Mission Valley and Serra Mesa via that route. However, in earlier discussions no commitment was made about actually providing such service or changing the route structure to accommodate that.” Will the second line of the statement about MTS’s non-commitment be added to section 5.2.8.3? If not, provide an explanation for the exclusion.

Air Quality

The Air Quality Report uses the baseline weather data from Lindbergh Field, located about 8 miles from the site of the roadway connection. However, the National Weather Service, also, maintains observations at Montgomery-Gibbs Executive Airport, located about 1.5 miles away and in the same wind flow patterns. Will the report be updated using the data from Montgomery-Gibbs Executive Airport for the analysis? If not, provide an explanation for the exclusion.

Can a baseline sampling be conducted at key areas (e.g., Franklin Ridge Road segment, City View Church, Faith Community Church, Hye Park, corner of Murray Ridge/Mission Center)? If not, provide an explanation for rejecting the request.

The ADTs on Phyllis Place will increase from 2,420 (existing) to 34,540 (2035). The construction of the roadway connection would concentrate vehicle trips in a specific area on a steep street.

- What is the maximum grade of the roadway connection? Would the grade of the street impact air pollution? If the grade will impact air pollution, will it be discussed, studied, and added? If it won't, provide an explanation for the exclusion.
- Would emissions collect at Phyllis Place (e.g., winds blowing up the hill), located across from retirement/Senior units? If there's a possibility of emissions collecting, will it be discussed, studied, and added? If it won't, provide an explanation for the exclusion.

Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway connection with a steep grade.

- Was an air pollution analysis of this area conducted? If this information won't be included, provide an explanation for the exclusion.
- Can tractors, trailers, and buses be restricted from the roadway connection?

The sensitive receptors are 56 retirement/Senior units located approximately 300 feet from the roadway connection, a public park to be constructed next to the roadway connection, and Elevate Elementary School at Faith Community Church. (Refer to Addendum, p. 9) Additionally, there may be a school at Via Alta. The Significance Determination Thresholds states that "If sensitive receptors are involved, the more restrictive of the guidelines should be applied." (p. 7)

- Was an analysis of the respirable particulate matter and fine particulate matter made for each of the sites? If affirmative, will this information be included? If not, provide an explanation for the exclusion.
- Will a hotspot analysis be conducted? If not, give an explanation for its exclusion.

This section indicates that the proposed CPA for a roadway connection would not include trip-generating uses but 4,780 residential units and 900,000 s.f. of commercial and office are being built at Civita, and it will redistribute traffic from Mission Valley to Serra Mesa. CPA which is specific to Serra Mesa creates additional traffic in Serra Mesa. The analyses show that the number of trips will increase at specific roadway segments and intersections. Will the air quality impacts for Serra Mesa from trip generating redistribution be included in this section?

The construction of the roadway connection would concentrate vehicle trips in a specific area. The Traffic Impact Study indicates there will be significant delays causing queuing in the vicinity of the I-805 ramps. Was the pollution from this queuing and the impacts on this area studied? If not, give an explanation for the exclusion.

There's a school and preschool located at Faith Community Church. Was an analysis of the impact of the air pollution caused by queuing and the atmospheric conditions (i.e., winds blowing west to east) on the school and preschool made? If not, provide an explanation for not conducting an analysis.

The site for the roadway connection was not approved for Quarry Falls. Provide an explanation for assuming that "vehicle trip generation and roadway construction for this specific site has been anticipated in the RAQs."

The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor. Mission Center Road from Aquatera to Murray Ridge Road segment will change from LOS E (existing) to LOS F (2035) with and without the connection. Will an analysis of this roadway segment be added? If not, provide an explanation for the exclusion.

Hye Park, 103 multifamily residential units, is located within Serra Mesa at Sevan Court adjacent to Mission Center Road. The complex is at the bottom of a deep ravine that can block air circulation. The ADTs will increase on Mission Center Road from Aquatera Drive to Murray Ridge Road from 9,035 (existing) to 13,064 (2035) with the connection and 23,850 (2035) without the connection. Would emissions collect in the Hye Park area? If there's a possibility of emissions collecting, will it be studied, discussed, and added? If it won't, provide an explanation for the exclusion.

If it's determined that any of the Traffic Impact Study needs revising and/or new traffic studies are conducted, would this impact the air quality analysis? If affirmative, which areas?

The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. Will the replacement of plant material with a hard surface have any impact on air quality?

Noise

Study and Site Selection

- There were more noise measurements made in Mission Valley than in Serra Mesa. Why wasn't a measurement made in the residential area at the western end of Phyllis Place?
- The residential area near the corner of Mission Center Road and Murray Ridge Road has a steep slope and a lot of traffic. Will this corner be added to the study? If not, provide an explanation for the exclusion.
- Why were sites R1 and R8 selected for the noise study? These two areas are located in Mission Valley and aren't connected to Civita. Will the additional sites in Serra Mesa that are significantly impacted by the roadway connection as shown by the Traffic Impact Study – along Murray Ridge Road and Sandrock Road be added to the noise study? If not, provide an explanation for the exclusion.
- Include the maximum measurements of noise and their frequency or provide a reason for their exclusion.
- Provide the standard deviation for the noise measurements or a reason for their exclusion.
- Noise was analyzed using the data from the Traffic Impact Study. If the Traffic Impact Study data is inaccurate, will the noise study be redone?

The ADTs for Franklin Ridge Road/Phyllis Place will increase from 2,420 (existing) to 34,540 (long term) with a LOS F (PM).

- The long term impacts with the roadway connection and without the roadway connection show a change of either 0 or 1dB in the residential areas of Murray Ridge Road and Phyllis Place and at City View Church even though the ADTs will increase tremendously at each of those areas. Provide an explanation for the illogical conclusion. If this conclusion is incorrect, will the appropriate areas of the Recirculated DEIR be corrected?

- Why isn't the increase in the noise level the same for R5 (Residential adjacent to Phyllis Place) and R6 (Church adjacent to Phyllis Place) since these two areas appear on the map to be equally distant from the roadway connection? If this conclusion is incorrect, will the appropriate areas of the Recirculated DEIR be corrected? If elevation accounts for the difference in the noise level, would there be an increase in the noise level in the residential areas west of R5 (since this area has a lower elevation)?
- Since Serra Mesa is located above Mission Valley where climatic and the environmental conditions included or considered in the noise analysis? If not, will an analysis be included? If not, provide an explanation for the exclusion.
- Vehicles (including diesel delivery trucks, especially from the retail area of Civita) will be queuing on a roadway connection with a steep grade.
 - What will be the noise level during the peak time? If this information won't be included, provide an explanation for the exclusion.
 - "Designate local truck routes to reduce truck traffic in noise-sensitive land uses areas." (Noise Element, NE-9) Can tractors, trailers, and buses be restricted from the roadway connection?
- "Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor" (City of San Diego Final PEIR, p. 3.10-3). Phyllis Place will become a heavily used major arterial. Discuss the noise impact on the adjoining retirement/Senior homes, church, and single-family dwellings. (Refer to Addendum, p. 9)
- The data for R11 – Residential adjacent to Via Alta is listed as 60 for existing but reduced to 57 for near-term baseline. Why would the sound level decrease?
- The data for R-11 – Residential adjacent to Via Alta is listed as 60 for existing and for near-term with project. With the project there will be more traffic on Via Alta. Why doesn't the sound level increase?
- The Final PEIR for the Quarry Falls Project (p. 10-49) identified 72 CNEL for the Franklin Ridge Road-Via Alta-Phyllis Place segment. Discuss the discrepancy between the Quarry Falls noise study and the noise study in this Recirculated DEIR. If the 72 CNEL is the actual noise level, will this Recirculated DEIR be updated? If not, provide an explanation for the exclusion.
- "Although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses." (Noise Element, p. NE-10) The area of the roadway connection in Serra Mesa is zoned for single family dwellings and there will be single family units in the Civita area of the roadway connection. If it's determined that the Franklin Ridge Road-Via Alta-Phyllis Place segment is 72 CNEL (refer to previous bullet), discuss the allowance of a roadway connection in regards to the cited Noise Element guidelines and attenuation measures.

Why would the dBA CNEL increase long term with the project versus without the project at site R2 (Residential adjacent to Mission Center Road north of Friars Road)? If more vehicles will be using the roadway connection, the noise level should logically decrease.

The site of the roadway connection will change from a plant covered terrain to a hard surface roadway. What effect does the hard surface have on noise propagation? Was the road surface considered during the noise analysis?

According to CEQA Guidelines, Article 9,15131 (b), “Economic or social effects of a project may be used to determine the significance of physical changes caused by the project... As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment.” Was an analysis made of the impacts of the roadway connection on the religious practices of City View Church and of Faith Community Church? If affirmative, what were the results? If not, will an analysis be conducted and included? If not, provide an explanation for the exclusion.

“Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor” (City of San Diego Final PEIR, p. 3.10-3). Mission Center Road from Aquatera to Murray Ridge Road without the connection will become a heavily used major roadway with ADTs of 23,850. Discuss the noise impact on the adjoining Hye Park condominium complex.

Biological Resources

The Biological Resources Letter, Appendix F, p. 6, states that “The quantification of biological resources described herein pertain to the project site only (approximately 2-acres) and do not include the 150-foot survey buffer evaluated during the reconnaissance. The 150-foot buffer is included on project maps to provide context as to the type of adjacent biological resources present only.”

- Refer to Figure 5.5-1 which indicates a 100-foot buffer encompassing the area of potential effect of a future roadway.” Is this 100-foot buffer the same as the 150-foot buffer referred to in the letter? Provide the analysis documentation.
- If the roadway connection is approved, it will traverse through Phyllis Place Park and create the need for additional park space. Would this required additional space be located in the MSCP area? If affirmative, what does the assessment of this area indicate?

Hydrology and Water Quality

If City View Church is required or finds it necessary to make changes to their parking lot and/or driveways because of the roadway connection, will changes to the stormwater drain system be required? If affirmative, provide a description of the changes, impacts, costs and the responsible party for the costs.

Visual Effects and Neighborhood Character

Some of the 56 retirement/Senior homes at City View Church have windows that face Phyllis Place. Were studies conducted to determine the impact on these homes of 1) vehicles traveling at night on the roadway connection with headlights on, 2) lights at night from street lights, and 3) light from the traffic signal at the intersection? If there is an impact, discuss mitigation measures. If a study wasn’t conducted, will one be conducted and if needed, mitigations discussed?

Phyllis Place is the only roadway in and out of the neighborhood for the 56 multifamily retirement/Senior units located at City View Church as well as for the Abbotshill area. (Refer to Addendum, p. 9) The roadway connection would increase ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place. Describe the criteria used to conclude that “impacts would be less than significant” (5.9.4).

The Steep Hillside Guidelines states “The recommendations came directly from the indicated Community Plan and conformance is required in order to make the findings for development approval” (p. 41). Stated for Mission Valley is “Orient development towards the valley and take access to Mission Valley projects from roads that do not extend above the 150-foot elevation contour.” (p. 42 and Recirculated DEIR, 5.9-7) Franklin Ridge Road will be above the 150-foot elevation contour. While the Recirculated DEIR mentions the 150-foot elevation contour requirement, it isn’t discussed in the impact analysis. Include a discussion of conformance with this policy or provide an explanation for the exclusion.

“Would the project result in (2) the creation of a negative aesthetic site or project; (3) substantial alteration to the existing or planned character of the area...” (5.9.5) Two park designs (one with the roadway connection and one without the roadway connection) have gone through the design approval process and the subsequent Park Development Agreement, p. 2, requires construction of the park. If the roadway connection was approved, the street would run through the park dividing it in two and Phyllis Place would be widened. Additional land will be needed for the park and for the road widening.

- Would the view from the park be impacted?
- Will the view from the bisected eastern portion of the park be the roadway connection on the west side and south side?

Will this information be included? If not, provide an explanation for the exclusion?

The park will be bisected by a roadway with 34,117 ADTs (2035) and will create a negative aesthetic, substantially altering the planned character of the area – Phyllis Place Park.

Phyllis Place will be changed from two lanes to five lanes (a major arterial) and the roadway connection will be four lanes. A huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution, for example).

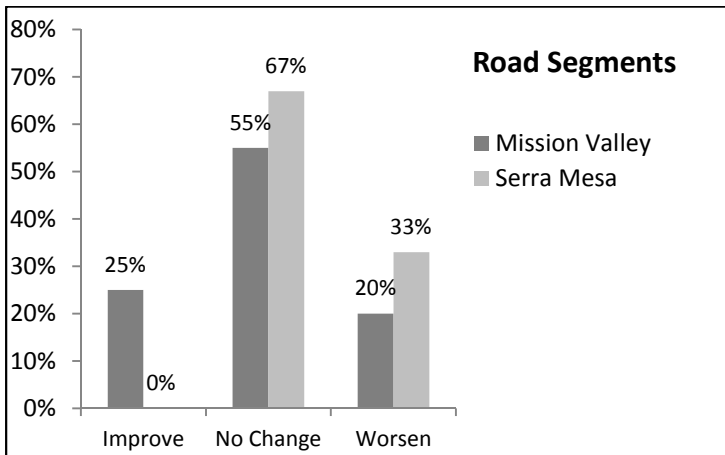
- Discuss how this would not strongly contrast with the surrounding topography.
- The Significance Determination Thresholds states “Note: for substantial alteration to occur, new development would have to be of a size, scale, or design that would markedly contrast with the character of the surrounding area.” (p. 75) Discuss how this would not be a change in scale in comparison to the low density housing residential zoning.
- Given the significant changes, provide an explanation for the conclusion that “Impacts would be less than significant.”

During peak traffic times access from the Abbotshill community to the rest of Serra Mesa will be impacted, affecting the support of local businesses and civic events. Will this impact on neighborhood character be discussed? If not, provide an explanation for the exclusion.

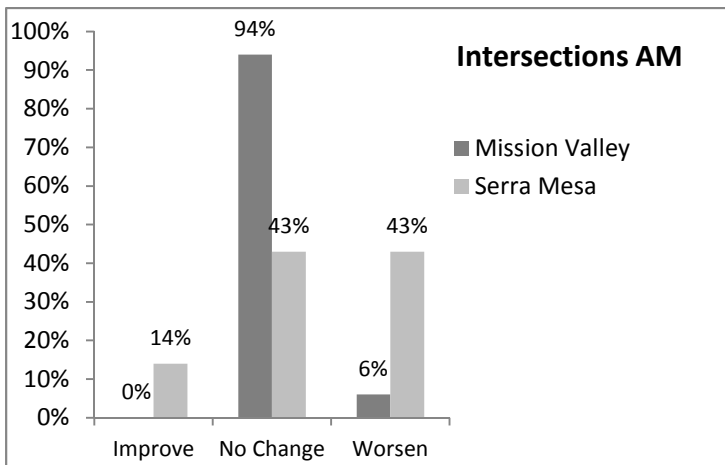
Cumulative Impacts

As shown in the analysis listed below the roadway connection long-term cumulative doesn’t alleviate congestion for both Serra Mesa and Mission Valley and increases congestion in Serra Mesa, especially at freeway ramps.

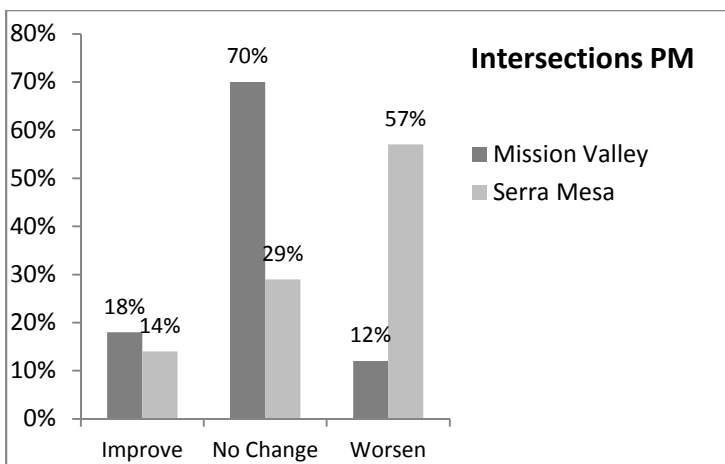
Analysis of the LOS Level Long-Term Baseline vs Long-Term Cumulative with Project - These charts are based on Tables 5.2-16 and Table 5.2-17. Analysis worksheets are in the Addendum, p. 5-8.



In both Serra Mesa and Mission Valley the greatest percentage of the roadway segments will receive the same LOS level. Also, in Serra Mesa one-third of the segments will worsen and none will improve.



The LOS No Change is almost 100% percentage for Mission Valley while in Serra Mesa both No Change and Worsen receive the same percentage.



In Mission Valley 70% of the intersections won't change LOS level while in Serra Mesa more than half of the intersections will worsen.

Conclusion: The road connection won't help most of the roadway segments and intersections in Mission Valley and will worsen ones in Serra Mesa.

On-Ramps for Long-Term Without the Roadway Connection in Comparison to With (refer to Table 5.2.18)

- Murray Ridge I-805 NB on-ramp AM delay increases 9 min; queueing from 0 to 3,886 ft (.74 mi).
- Murray Ridge I-805 SB on-ramp PM delay increases 31 min; queueing from 2,407 to 10,368 ft (1.96 mi), beyond Sandrock.

CO-14
cont.

6 Cumulative Impact Analysis

- Refer to Land Use sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Traffic Circulation/Parking and Parking sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Air Quality sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Noise sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Biological Resource sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Hydrology and Water Quality sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.
- Refer to Visual Effects and Neighborhood Character sections of this letter. If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.

6.2 List of Cumulative Projects –

- Is this table up-to-date as of March 2017?
- There are some projects in Grantville/Allied Gardens (e.g., River Park and Centrepont).
- There is a proposal to redevelop the Qualcomm Stadium site. People attending events use Serra Mesa streets to travel from I-805 to the stadium.
- Can development occur along Mission Center Road from Aquatera to Murray Ridge Road? (A property owner has contacted the Serra Mesa Planning Group about changing the zoning.) If so, what would be the impact?
- Is the Mission Village Shopping Center redevelopment project included in the list?

Will the table be changed to reflect updated information or added projects, appropriate studies and analyses? If not, provide an explanation for the exclusion.

Effects Not Found to be Significant

Health & Safety regarding adopted emergency response plan or emergency evacuation plan: Emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa. This access provides for bicycle and pedestrian access and linkages. Does an evacuation plan exist for this site? Also, the developer will provide a minimum of one trail connection between Serra Mesa and Civita in Mission Valley for pedestrians and bikers. (Refer to Addendum, p. 13) Discuss the impact a roadway connection which creates more congestion near the freeways will have on an adopted emergency plan at Kaplan/Aperture Circle if it exists or were developed.

Public Services and Facilities sections and any reference to the park at Phyllis Place of this letter: If there's any information that is updated, will this Cumulative Impacts section be revised to reflect the new information? If not, provide an explanation for the exclusion.

Fire Rescue Services – There is an existing emergency access between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.

- Will this information be included in this section? If not, provide an explanation for the exclusion. If so, provide documentation.
- Has the Fire-Rescue Department specifically stated that they support this roadway connection?
- Was an analysis conducted to determine the difference in response time using the roadway connection versus using the Aperture Circle/Kaplan Drive access that already exists? Is the difference in response time significant?

Natural Gas

- Would any changes be needed to the fiber optics located in this area? If yes, will this information be included and discussed? If not, provide an explanation for the exclusion. (p. 7-2, p. 7-16)
- Was SDG&E consulted to determine if a street connection would impact maintenance of high power lines? If yes, what were their comments? If not, will they be contacted? If they won't, provide an explanation for the exclusion.
- High Pressure Gas Line
 - Will the construction of the roadway connection and/or the widening of Phyllis Place impact the gas line? Will relocation be needed? What are the risks to the gas line during roadway construction and/or, if required, during relocation?
 - With the increase in traffic on Phyllis Place will the high pressure gas line located in that area be impacted by the 1) load on top of the pipe and/or 2) weight? Was an analysis conducted of the risk for failure from vibrations?

Mandatory Discussion Areas

Significant Effects Which Cannot Be Avoided – It's hard to make the significant effects determination when there's critical information that's missing and pertinent studies that were not conducted. If any of the items identified in any sections of this letter will have a significant effect, will this section be updated? If not, provide an explanation for the exclusion.

Alternatives

Selection of Objectives: The General Plan and Community Plan Amendment Manual, p. 5, states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

If these objectives had been used, as required by the City Council as the project’s objectives instead of the objectives selected by staff/management in the studies and the analyses, what would be the conclusion for each alternative?

Table 9-1. Summary of Significant Effects of the Proposed Project doesn’t list: Results in a negative aesthetic site or project and Results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. The project is a roadway creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is permanent and substantially changes the character of the area – creating a significant impact to the community. If this information were considered, what would be the impact?

Alternatives Considered but Rejected

No Build/Remove from Mission Valley Community Plan Alternative - “This alternative is rejected because it would not meet any of the project objectives...” doesn’t consider the following:

1. Resolve Community Plan Inconsistency by Providing Multi-modal Linkages
 - Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge.
 - A minimum of one trail for pedestrian and bike access between Civita and Phyllis Place Park is mandated with or without the road.
 - Pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
2. Improve Local Mobility – In addition to the items listed in #1, consideration is not given to the
 - Gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicles accessing I-805. This gridlock will limit the mobility for the residents of the 200+ single family dwellings and the 56 retirement/Senior homes west of Franklin Ridge.
 - Required improvement to Mission Center Rd, if the roadway connection isn’t approved.
3. Alleviate traffic congestion and improve navigational efficiency between Serra Mesa and Mission Valley
 - Options exist with Mission Center Road and Mission Village Drive.
 - Alleviate traffic congestion – Refer to bar chart analysis in this letter that shows the roadway connection for the most part does not alleviate traffic congestion in Mission Valley and worsens the congestion in Serra Mesa.

4. Improve Emergency Access and Evacuation – Emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.
5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

Under Traffic Hazards (5.2.6) it's stated that "Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (Impact TRAF-19), and mitigation is required."

Also, in this same section is the following comment "However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project." Additionally, it's stated "However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable." (5.2.6.1)

The City's analysis indicates that Franklin Ridge Road will create an unsafe situation that is "significant and unavoidable." Given the situation described in this document, explain how this situation meets the objective to create a safe design and discuss liability issues regarding this unsafe situation. Also, refer to the other sections of this letter that describe environmental and neighborhood impacts.

CO-14
cont.

Explain how these objectives are met when the information described in the response for each objective is considered.

"...For example, the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)

- Climate Action Plan
 - Cite the reference in the City's Climate Action Plan that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley.
 - Are there other assumptions that were made in the Climate Action Plan that will require additional analysis (e.g., removal of the Regents Road Bridge from University City planning area)? What is the process that they went through for removal?
- Cite the reference in the Bicycle Master Plan that describes this assumption and specifically mentions a roadway connection. A *proposed* Class II bike lane for the roadway connection is shown in Figure 6-2 of the plan. There will be a bike path from Civita to Phyllis Place Park with or without the roadway connection. Since the Class II bike lane is listed as *proposed* what would require updating in the Bicycle Master Plan if the roadway connection wasn't approved?
- The Mission Valley Community Plan is in the process of being updated. Will an environmental analysis be needed for this community plan update process? Could the removal of the roadway connection from the Mission Valley Community Plan be made during this update process?

The analysis doesn't mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments. Will these inconsistencies be added and discussed?

- The Sand and Gravel Re-use Development section (p. 56) states "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan.

- “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.
- “Development oriented towards the Valley and accessed by roads from the Valley floor should not extend above the 150-foot elevation contour.” (p. 124)

This alternative meets most of the objectives cited for the project and is feasible and should have been considered. Will this alternative be considered?

Analysis of Alternative 1 - No Project Alternative

Many of the issues that were discussed in the No Build/Remove from Mission Valley Community Plan Alternative section apply to this No Project section.

Mission Center Road and Mission Village Drive provide multiple linkages between Serra Mesa and Mission Valley. Will this information be added to the analysis and considered in the conclusion? If not, provide an explanation for the exclusion.

“...Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project. Describe the criteria used to reach the “greater” conclusion.

If the inconsistencies in the Mission Valley Community Plan which probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, would the impacts be considered “greater”?

Conclusion – The following information was not included or discussed in this Recirculated DEIR:

Emergency access exists between Aperture Circle in Civita and Kaplan Drive Serra Mesa.

The completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages. (Refer to Addendum, p. 10)

The developer will provide a minimum of one trail connection for pedestrians and bikers between Phyllis Place Park and Civita in Mission Valley. (Refer to Addendum, p.13)

Mission Center Road is a direct route connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley.

- If this information were included and used in the evaluation, what would be the impact on the “No Project” alternative?
- If the issues that staff was required to study as defined in the City Council Resolution were considered, what would be the outcome? (Refer to Objectives section of this letter.)
- If the mitigations that will probably not be implemented are considered, what would be the outcome?

Air Quality – If an analysis of air quality in the Hye Park condominium complex area is conducted and shows a significant impact without the street connection, will this result be added and discussed? If not, provide an explanation for the exclusion.

The No Project Alternative would meet most of the objectives. Refer to the discussion in this letter for No Build/Remove from Mission Valley Community Plan.

Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

- Land Use – The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?
- Transportation/Circulation and Parking – Refer to the Transportation/Circulation and Parking section of this letter. Questions are raised about the validity of the Community Access data. If this data is revised, would the conclusion change?
- Relationship to Objectives – Refer to the Objectives section of this letter. If staff were to study the objectives as defined in the City Council Resolution, what would be the outcome?

Environmentally Superior Alternative

The conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities.

- Linkages already exist with Mission Center Road and Mission Village Drive.
- The Mission Valley Community Plan is inconsistent with the Serra Mesa Community Plan and contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.”

What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered? For discussion refer to the No Build/Remove from Mission Valley Community Plan Alternative section in this letter.

Additionally, it’s stated that “...both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project.”

- The studies don’t necessarily support this conclusion for the “Alternative 1- No Project Alternative” and “Alternative 2 – Bicycle, Pedestrian, Emergency Access Only Alternative.” Refer to the discussion under alternatives in this letter and to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-33).
- With the street connection there is a 31 minute delay at I-805 SB on-ramp (p. 5.2-35). To reduce the delay to zero requires mitigation – fair share contribution to Caltrans. The impacts of the mitigation and the feasibility of implementation aren’t discussed. The “No Street Connection” shows 15 minute delays on I-805 (Appendix C) in the year 2035, which is within the City’s acceptable threshold. The data doesn’t support the analysis that the No Street Connection “would result in greater impacts associated with transportation and traffic...” (9.5.3) Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion.

It’s stated that “...these impacts would be mitigated to less-than-significant levels under the proposed project.” Refer to the Mitigation section of this letter. If the infeasible mitigations aren’t included, what would be the impact?

The statement is made “It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or in the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.” If it were determined that the VMT study is inaccurate, what would be the impact on this conclusion?

Conclusion

This chart summarizes the major issues that have been described in the body of this letter. Refer to the appropriate sections of the letter for a description/discussion of the item/comment.

Flaw	Item/Comment
Omission	Emergency, bike, and pedestrian access exists between Kaplan Dr in Serra Mesa and Aperture Circle in Civita (Mission Valley). ^{2,3}
Omission	Multifamily units at City View Church are Retirement/Senior housing (sensitive receptors) ^{2,3} located approximately 300 feet from the roadway connection.
Omission	Mission Valley Community Plan is in the process of being updated; inconsistency with Serra Mesa Community Plan could be corrected at this time. ³
Omission	Trail for pedestrians and bicyclists linking Civita and Phyllis Place Park already mandated without the roadway connection. ^{1,3}
Omitted in discussion	Mission Center Rd and Mission Village Dr provide a direct link between Serra Mesa and Mission Valley. ³ This was not included in the sections discussing linkages.
Violates City Policies and Goals	<ul style="list-style-type: none"> • Walkable Community and City of Villages^{1,2,3} (e.g., impacts on bisected park and roadway connection will increase traffic on Civita local streets). • Fosters auto dependency^{2,3} (e.g., roadway connection won't encourage mass transit usage).³ • Vehicle congestion relief³ (e.g., bar charts in this letter show an increase in congestion in Serra Mesa and Mission Valley). • Bicycling¹ (e.g., mitigations require bike lane removal)³ • Safe and efficient street design² (e.g., safety of bisected park³; City View driveway deemed to provide a safety hazard for vehicles entering or exiting at City View).
Violates Serra Mesa Community Plan	References from SMCP: <ul style="list-style-type: none"> • Street widening and other improvements should be minimized.³ • Safe transportation system with minimal adverse effects.³ • Steep hillside and canyons protected and preserved.³
Violates Mission Valley Community Plan	References from MVCP: <ul style="list-style-type: none"> • Streets should be connected to road network and not to the mesas.³ • Franklin Ridge Rd extension is 4 lanes rather than stipulated 2 lanes.³ • Roadway connection would extend above the 150-foot contour restriction.


Flaw	Item/Comment
Traffic Impact Study & Analysis Inadequate; Data may be invalid	<ul style="list-style-type: none"> • Inadequate Traffic Impact Study (traffic counts outdated).³ • Impact of queuing on residential area not studied (e.g., long term 31 min delay at I-805 SB Ramp PM).³ • Study not comprehensive – Not studied: the adjacent main streets of Serra Mesa (e.g., Greyling Dr), Texas St (a direct thoroughfare), Friars near Qualcomm Stadium.³ • Possibility of induced traffic not studied.³ • Not all of the proposed and/or approved projects for Mission Valley are included in the study.³ • If roadway connection not approved, developer required to make improvements to Mission Center Rd. These improvements aren't considered in the analyses.³
Inconsistency	In Recirculated DEIR description of Phyllis Place from Franklin Ridge to I-805 SB ramp described as widening (p. 5.2-27) in MM-TRAF-3 and as reconfiguring in MM-TRAF-11 (p. 5.2-39).
Air Quality & Noise Analysis Validity	<ul style="list-style-type: none"> • Impacts on sensitive receptors not studied.³ • Air quality and Noise analysis is based on Traffic Impact Study and will be invalid if the Traffic Impact Study is invalid.³
Data May Not Be Valid	No basis for estimate made of current VMT in (all) regions with VMT affected by the proposed road connection nor any basis for estimating the extent of increase or decrease in VMT expected from the roadway connection. Data used for VMT analysis inaccurate.
Deficient	Recirculated DEIR objectives don't agree with City Council Resolution and mandates.
Objectives Not Met	Both Recirculated DEIR objectives (which are different from the ones in DPEIR) and City Council's objectives (see references in letter) aren't met.
Mitigation Analysis Inadequate or Infeasible	<ul style="list-style-type: none"> • Detailed description not provided for all mitigations (e.g., Murray Ridge and I-805 NB and SB ramps). • Impact on environment for mitigations not studied/discussed (e.g., land needed for widening of Phyllis Place from two lanes to five lanes).³ • Impact of implementation of mitigations on adjacent streets not studied/discussed (e.g., Raejean, Greyling Dr, etc.).³ • Implementation of 6 of the 19 mitigations violates City's land use and mobility policies; 8 of 19 mitigations assume mitigation will not occur; 10 of 19 mitigations would remain Significant and Unavoidable. (Letter, Impacts Section)
Conclusion Not Based on Evidence	Negative aesthetic site of project and substantial alteration to existing or planned character of area considered insignificant. Evidence: park bisected by roadway and ADTs increase from 2,420 (existing) to 34,540 (long term). Huge traffic increase into a residential community brings with it by definition additional safety and quality of life issues (noise, accidents, parking, and pollution for example).
Conclusion Not Based on Evidence	<ul style="list-style-type: none"> • Recirculated DEIR indicates the alternatives would result in greater impacts associated with transportation and traffic. Cumulative impact bar chart analysis proves the roadway connection results in greater impacts in Serra Mesa. • Many of the mitigations aren't feasible. An analysis using any infeasible mitigation to show a less-than-significant impact is inaccurate.

Flaw	Item/Comment
Conclusion Not Based on Evidence	<p>The No Build/Remove from Mission Valley Community Plan Alternative was rejected because it didn't meet the Recirculated DEIR project objectives. When, in reality, the facts are:</p> <ul style="list-style-type: none">• Mission Center Rd provides a multi-modal linkage.• Trail for pedestrian and bike access is mandated.• Emergency access exists.• Increase in congestion if roadway connection built (Letter, bar charts).• Required improvement to Mission Center Rd if roadway connection not approved (Final PEIR for the Quarry Falls Project).• Recirculated DEIR admits that the roadway connection creates a "safety hazard" for vehicles entering and exiting at the City View Church• Data supporting contention that the City's Climate Action Plan and Bicycle Master Plan Update would be inconsistent not provided. <p>This alternative is feasible.</p>
Inconsistency & A Priori Assumption	<p>In discussing the No Build/Remove from Mission Valley Community Plan Alternative this statement is made "... the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)</p> <p>The City knew in 2008 prior to the development of the Climate Action Plan (2015) and the Bicycle Master Plan (2013) that there was a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan.</p>

¹ Refers to Final PEIR for the Quarry Falls Project, July 2008
² Refers to Notice of Preparation, 2012
³ Refers to Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report, dated 4/15/2016

As indicated in the above chart comments were made and submitted during the NOP and the DPEIR timeframe. The corrections weren't made to this Recirculated DEIR. This Recirculated DEIR is inadequate and many of the mitigation measures are infeasible because they conflict with the City's land use and mobility policies and/or cost.

Thank you for the opportunity to review this Recirculated DEIR. If you have any questions with reference to any of the items raised in our response, please contact me. We look forward to your response within the duly allowed timeframe.

Sincerely,


Bob Crider
Chair, Serra Mesa Planning Group

References

These substantial background records are already within the city's files and records and state records. If a full copy is desired, requested, or necessary to be submitted, please inform the above writer.

City of San Diego. 2016. *California Environmental Quality Act Significance Determination Thresholds*. July. Available:

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Attachment - Missing Online Included in the Addendum, p. 1-4

City Council Resolution 304297: A Resolution of the Council of the City of San Diego Initiating An Amendment to the General Plan and Serra Mesa Community Plan to Include a Street Connection Between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element for the Quarry Falls Project October 2008.

Addendum

City Council Resolution R-304297

R-304297 - SMCP Initiation Resolution.pdf - Adobe Reader

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(R-2009-541) 3216
MEET 10/21

RESOLUTION NUMBER R- 304297

DATE OF FINAL PASSAGE OCT 21 2008

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO INITIATING AN AMENDMENT TO THE GENERAL PLAN AND SERRA MESA COMMUNITY PLAN TO INCLUDE A STREET CONNECTION BETWEEN PHYLLIS PLACE AND FRIARS ROAD IN THE SERRA MESA COMMUNITY PLAN CIRCULATION ELEMENT FOR THE QUARRY FALLS PROJECT.

WHEREAS, on May 11, 2005, Quarry Falls, LLC., submitted an application to the City of San Diego for a community plan amendment, General Plan amendment, rezone, specific plan, Master Planned Development Permit, Site Development Permit, vesting tentative map, and Conditional Use Permit/Reclamation Plan amendment for the Quarry Falls Project; and

WHEREAS, on October 21, 2008, the Council of the City of San Diego held a public hearing to consider approval of the Quarry Falls Project and related actions, including Staff Recommendation No. 6, recommending the initiation of an amendment to the General Plan and Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Circulation Element; and

WHEREAS, the construction of the street connection between Phyllis Place and Friars Road and the associated land use plan amendments were analyzed in Environmental Impact Report No. 49068 certified for the Quarry Falls Project; and

WHEREAS, the Serra Mesa Community Plan does not include a street connection between Phyllis Place and Friars Road; and

WHEREAS, the Mission Valley Community Plan recommends the inclusion of a street connection between Phyllis Place and Friars Road; and

Page 1 of 3

CO-14
cont.

CO-14
cont.

R-304297 - SMCP Initiation Resolution.pdf - Adobe Reader

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(R-2009-541)

WHEREAS, an amendment to the Serra Mesa Community Plan to include a street connection would reconcile the conflict between the Mission Valley Community Plan and the Serra Mesa Community Plan; and

WHEREAS, pursuant to the General Plan, the Council of the City of San Diego may initiate a community plan amendment; and

WHEREAS, City Council initiation of a community plan amendment is the first step that allows staff to proceed with the analysis of proposals and preparation of any necessary revisions to adopted documents; and

WHEREAS, the initiation of a community plan amendment in no way confers adoption of a plan amendment and City Council is in no way committed to adopt or deny the amendment once it goes forward for approval; and

WHEREAS, the City Council of the City of San Diego considered the issues discussed relating to the initiation of the Serra Mesa Community Plan amendment; NOW THEREFORE,

BE IT RESOLVED, by the Council of the City of San Diego that this Council initiates the amendment to the Serra Mesa Community Plan and the General Plan to include the street connection between Phyllis Place and Friars Road; and

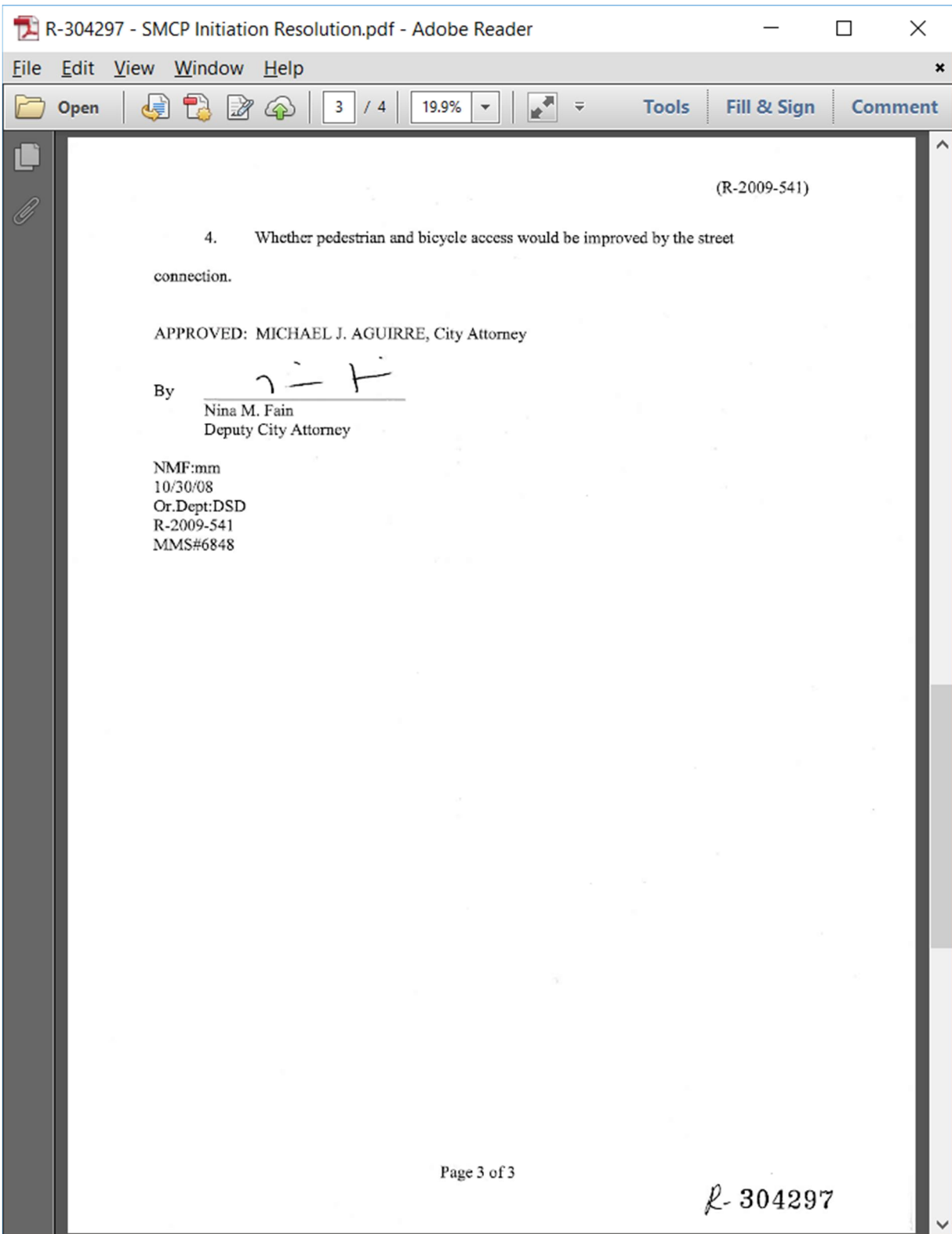
BE IT FURTHER RESOLVED, by the Council of the City of San Diego that this Council directs staff to analyze the following issues in relation to the aforementioned street connection and land use plan amendments:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.

Page 2 of 3

R- 304297

CO-14
cont.



CO-14
cont.

R-304297 - SMCP Initiation Resolution.pdf - Adobe Reader

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Passed by the Council of The City of San Diego on OCT 21 2008 by the following vote:

Council Members	Yeas	Nays	Not Present	Recused
Scott Peters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Kevin Faulconer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toni Atkins	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anthony Young	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brian Maienschein	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Donna Frye	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jim Macaffer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ben Hueso	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Date of final passage OCT 21 2008

AUTHENTICATED BY:

(Seal)

JERRY SANDERS
Mayor of The City of San Diego, California.

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By Mary Gumaiza Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 304297

Data Analysis

Intersection AM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worsen	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	B		B				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	B		B				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		E		C		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	C		C				X			
7. Mission Center Rd & Westside Dr	B		B				X			
8. Mission Center Rd & Friars Rd/EB ramps	B		B				X			
9. Mission Center Rd & Friars/WB ramps	B		B				X			
10. Mission Center Rd & Mission Center Ct	C		C				X			
11. Aero Dr & Sandrock Rd		B		B				X		
12. Murray Ridge Rd & Sandrock Rd		B		B				X		
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		B		C						X
15. Murray Ridge & I-805 SB ramp		C		E						X
16. Qualcomm Wy & Friars EB ramp	C		C				X			
17. Qualcomm Wy & Friars WB ramp	C		C				X			
18. Qualcomm Wy & Rio Bonito Wy	C		C				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		A						X***
21. Via Alta & Franklin Ridge Rd	D		D				X			
22. Via Alta & Civita	B		B				X			
23. Civita Blvd & Russell Pkwy/Gill Village Dr	A		B						X	
24. Qualcomm Wy & Civita Blvd	B		B				X			
Total	17	7			0	1	16	3	1	3
% of Total by Community					0%	14%	94%	43%	6%	43%

*Data from Table 5.2-17 **MV=Mission Valley; SM=Serra Mesa ***Starting data is 0; adding traffic impacts it

Analysis for Intersections AM

- Serra Mesa Intersections: 14%, improve; 43%, no change; 43%, worsen
- Mission Valley Intersections: 0%, improve; 94%, no change; 6%, worsen

Intersection PM Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Intersection	LOS Without Project		LOS With Project		Change in LOS**					
					Improve		No Change		Worse	
	MV	SM	MV	SM	MV	SM	MV	SM	MV	SM
1. Friars Rd & River Run Rd	C		C				X			
2. Friars & Fenton Pkwy	C		C				X			
3. Friars Rd & Northside	E		E				X			
4. Mission Center Rd & Murray Ridge/Phyllis Pl		F		D		X				
5. Mission Center Rd & Aquatera	B		B				X			
6. Mission Center Rd & Civita Blvd	D		C		X					
7. Mission Center Rd & Westside Dr	C		C				X			
8. Mission Center Rd & Friars Rd/EB ramps	C		B		X					
9. Mission Center Rd & Friars/WB ramps	C		C				X			
10. Mission Center Rd & Mission Center Ct	D		D				X			
11. Aero Dr & Sandrock Rd		C		C				X		
12. Murray Ridge Rd & Sandrock Rd		D		E						X
13. Murray Ridge & Pinecrest Ave		B		B				X		
14. Murray Ridge & I-805 NB ramp		D		F						X
15. Murray Ridge & I-805 SB ramp		E		F						X
16. Qualcomm Wy & Friars EB ramp	E		E				X			
17. Qualcomm Wy & Friars WB ramp	F		E		X					
18. Qualcomm Wy & Rio Bonito Wy	D		D				X			
19. Rio San Diego Dr & Rio Bonito Wy	B		B				X			
20. Phyllis Pl & Franklin Ridge Rd		-		B						X***
21. Via Alta & Franklin Ridge Rd	B		F						X	
22. Via Alta & Civita	B		C						X	
23. Civita Blvd & Russell Pkwy/Gill Village Dr	C		C				X			
24. Qualcomm Wy & Civita Blvd	C		C				X			
Total	17	7			3	1	12	2	2	4
% of Total by Community					18%	14%	70%	29%	12%	57%

*Data from Table 5.2-17 **MV=Mission Valley; SM=Serra Mesa ***Starting data is 0; adding traffic impacts it

Analysis for Intersections PM

- Serra Mesa Intersections: 14%, improve; 29%, no change; 57%, worsen
- Mission Valley Intersections: 18%, improve; 70%, no change; 12%, worsen

Roadway Segment Analysis: Long-Term Baseline Cumulative vs Long-Term Cumulative with Project*

Roadway Segment	Mission Valley	Serra Mesa	LOS W/Out Project	LOS With Project	Change in LOS**					
					Improve		No Change		Worsen	
					MV	SM	MV	SM	MV	SM
Civita Blvd										
Mission Center Rd to Via Alta	X		B	A	X					
Via Alta to Russell Parkway	X		B	A	X					
Russell Pkwy to Qualcomm Wy	X		C	B	X					
Qualcomm Wy to Franklin Ridge	X		A	C					X	
Franklin Ridge Rd										
Via Alta to Civita	X		C	F					X	
Phyllis Place to Via Alta		X	O	D						X
Friars Rd										
Mission Center Rd to Qualcomm Wy	X		C	C			X			
Qualcomm Wy to Fenton Pkwy	X		C	C			X			
Fenton Pkwy to Northside Dr	X		C	C			X			
Mission Center Rd										
Hazard Center Dr to Friars Rd	X		D	D			X			
Friars Rd to Mission Center Drwy	X		C	C			X			
Mission Center Drwy to Mission Valley Rd	X		B	B			X			
Mission Valley Rd to Aquatera Drwy	X		C	A	X					
Aquatera Drwy to Murray Ridge Rd		X***	F	F				X		
Murray Ridge Rd										
I-805 NB ramp to Mission Center Rd		X	F	F				X		
Mission Center Rd to Pinecrest Ave		X	F	F				X		
Pinecrest Ave to Sandrock Rd		X	F	F				X		
Phyllis Pl										
Abbotshill Rd to Franklin Ridge Rd		X	A	A				X		
Franklin Ridge Rd to I-805 SB ramp		X	A	F						X
I-805 SB ramp to I-805 NB ramp		X	E	F						X
Qualcomm Way										
Civita Blvd to Friars Rd WB ramp	X		B	C					X	
Friars Rd WB to Friars Rd EB ramp	X		B	B			X			
Friars Rd EB ramp to Rio San Diego	X		B	B			X			
Rio San Diego Dr										
Qualcomm Wy to Rio Bonito Wy	X		E	E			X			
Russell Pkwy										
Civita Blvd to Friars Rd	X		C	C			X			
Sandrock Rd										
Murray Ridge to Aero Dr		X	D	D				X		
Westside Dr										
Mission Center Rd to Via Alta	X		C	D					X	
Via Alta										
Franklin Ridge Rd to Civita Blvd	X		A	C					X	
Civita Blvd to Westside Dr	X		A	A			X			
Total	20	9			4	0	11	6	5	3
% of Total by Community					25%	0%	55%	67%	20%	33%

*Data from Table 5.2-16

**MV=Mission Valley; SM=Serra Mesa

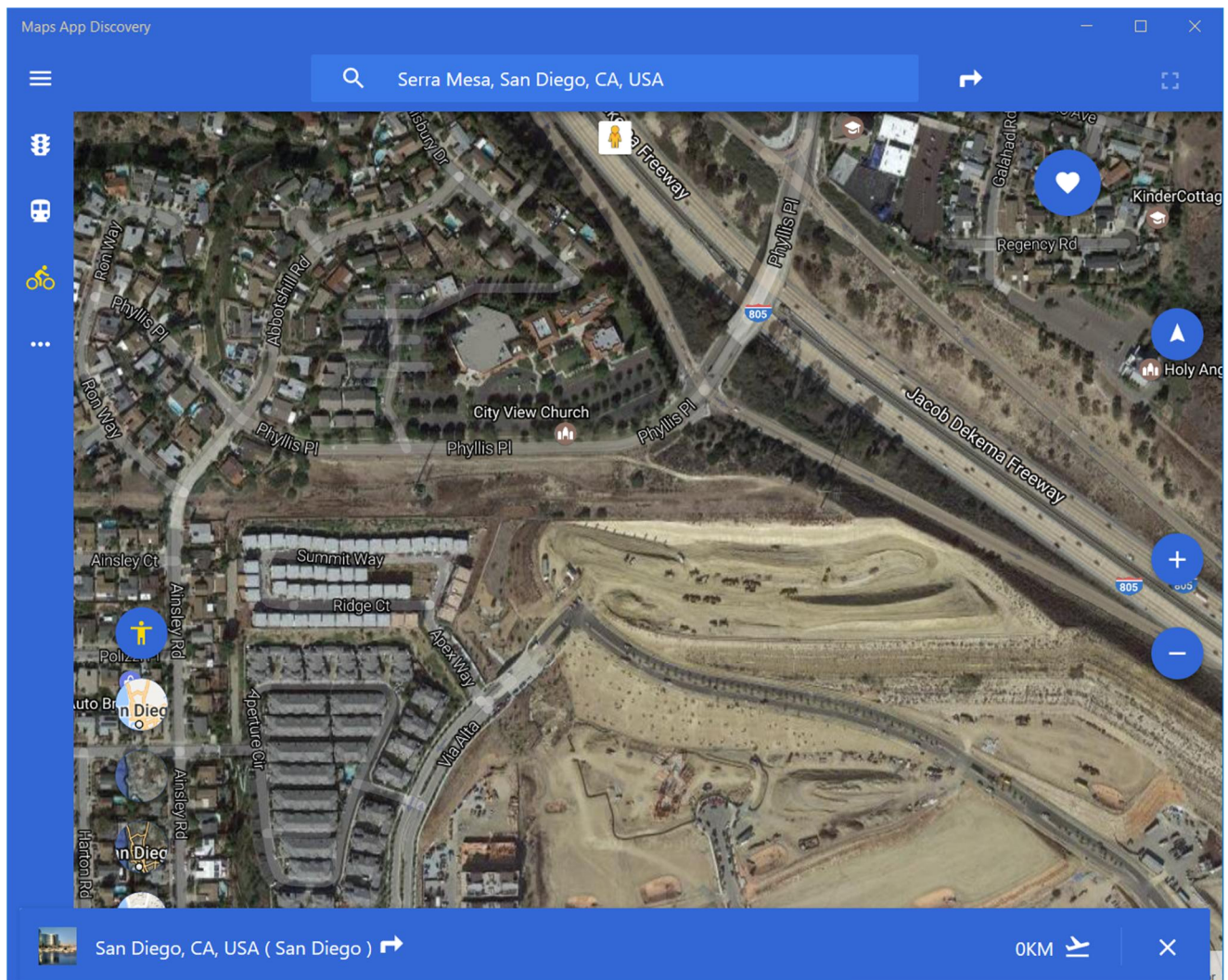
***Most of this area is in Serra Mesa

Analysis for Roadway Segment

- Serra Mesa Segments: 0%, improve; 67%, no change; 33%, worsen
- Mission Valley Segments: 25%, improve; 55%, no change; 20%, worsen

Maps

View of City View Church, Via Alta & Franklin Ridge, Freeways and Housing in Serra Mesa and Civita



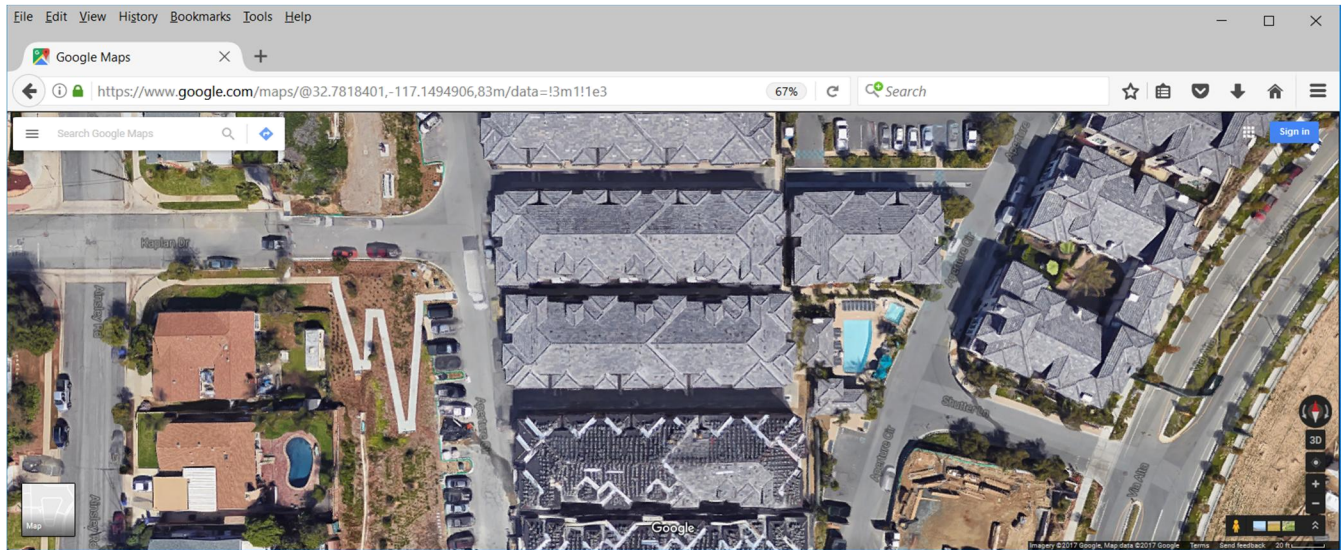
City View Church's Two Driveways, Retirement/Senior Housing, Transmission Line & Steep Hillside
Roadway connection will be located south side of Phyllis Pl across from church's east driveway and path.



Retirement/Senior Housing (windows facing street); Roadway connection across street from church path

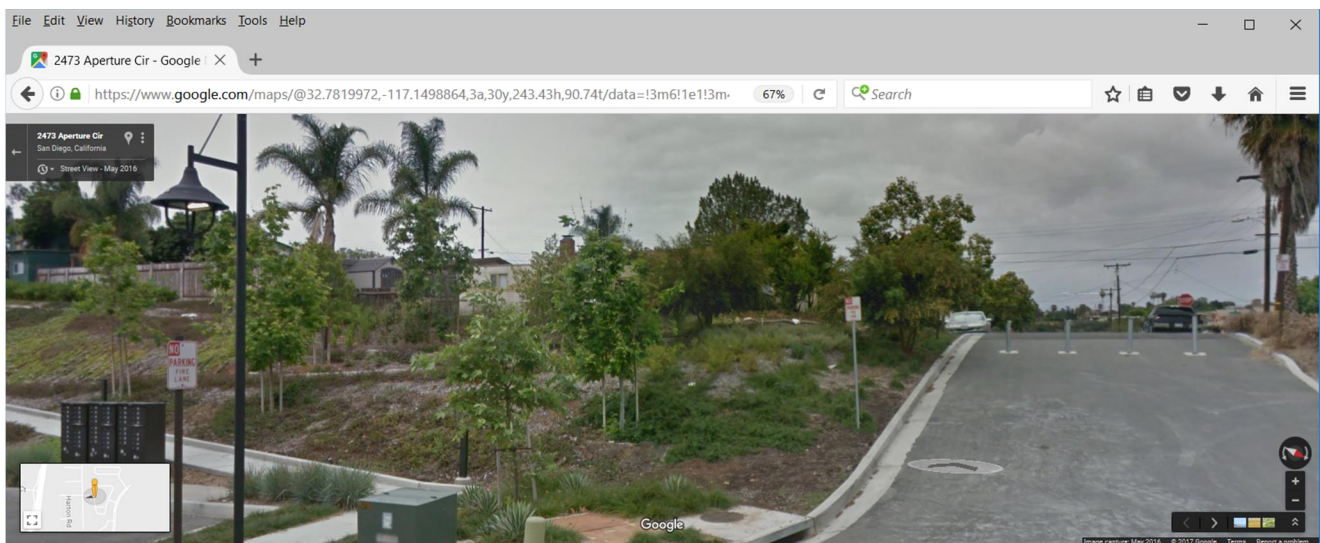


Shows Emergency Access at Kaplan and Aperture Circle and
Sidewalk (switchback) adjacent to Kaplan from Ainsley to Aperture Circle

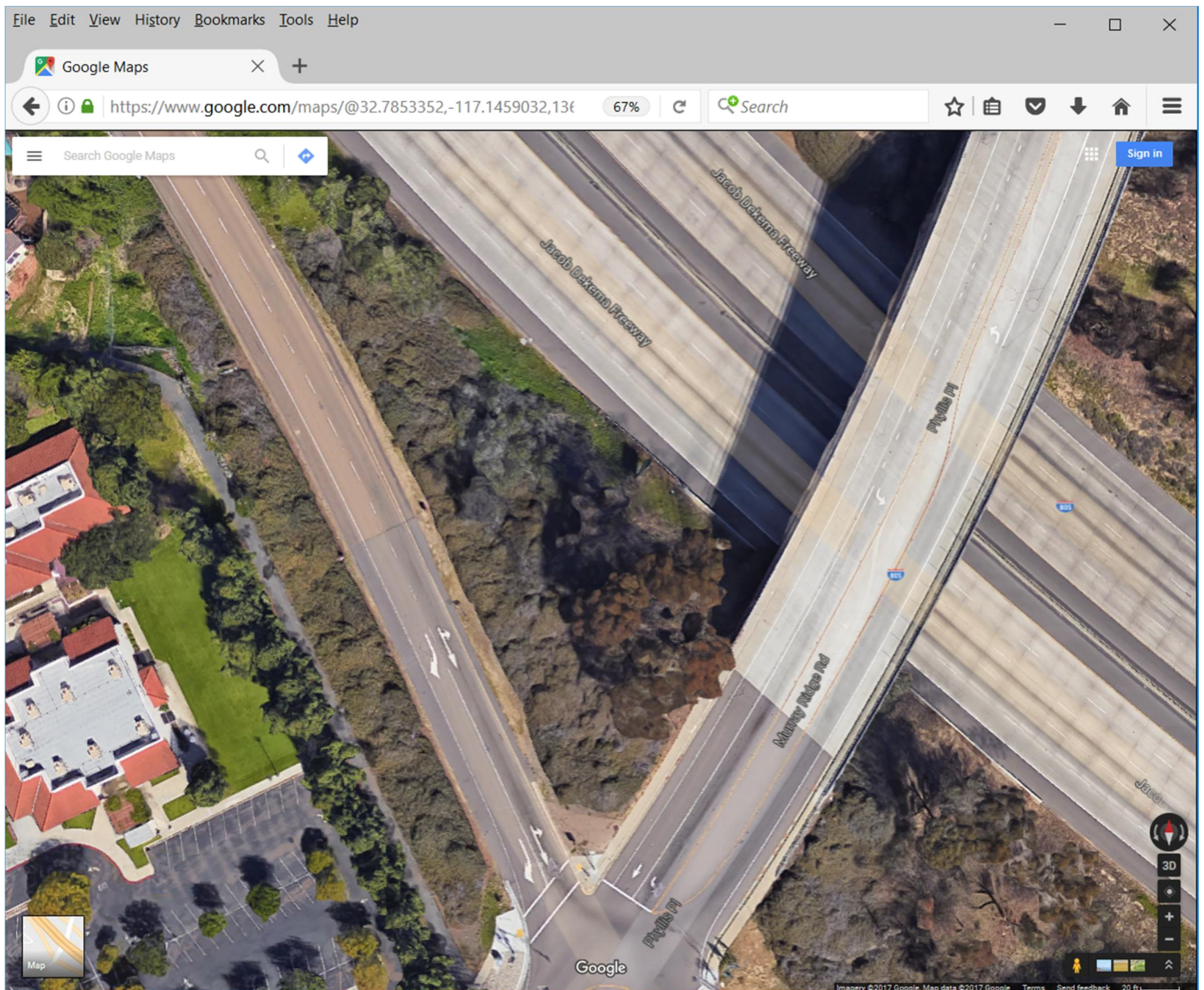


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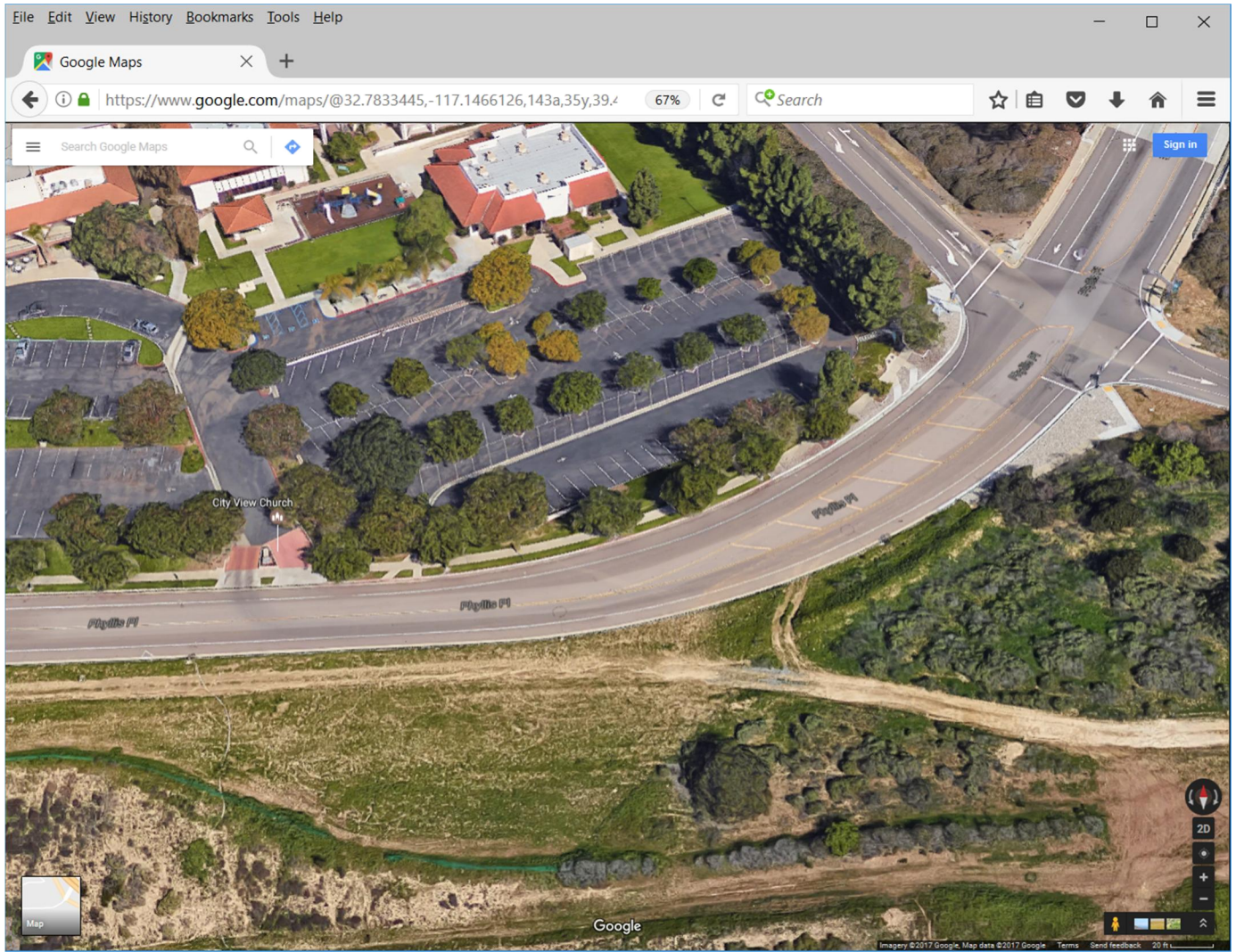
Shows Emergency Access (bollards) at Kaplan and Aperture Circle and some of the sidewalk



I-805 Phyllis Place Bridge – Shows Lanes over the Bridge



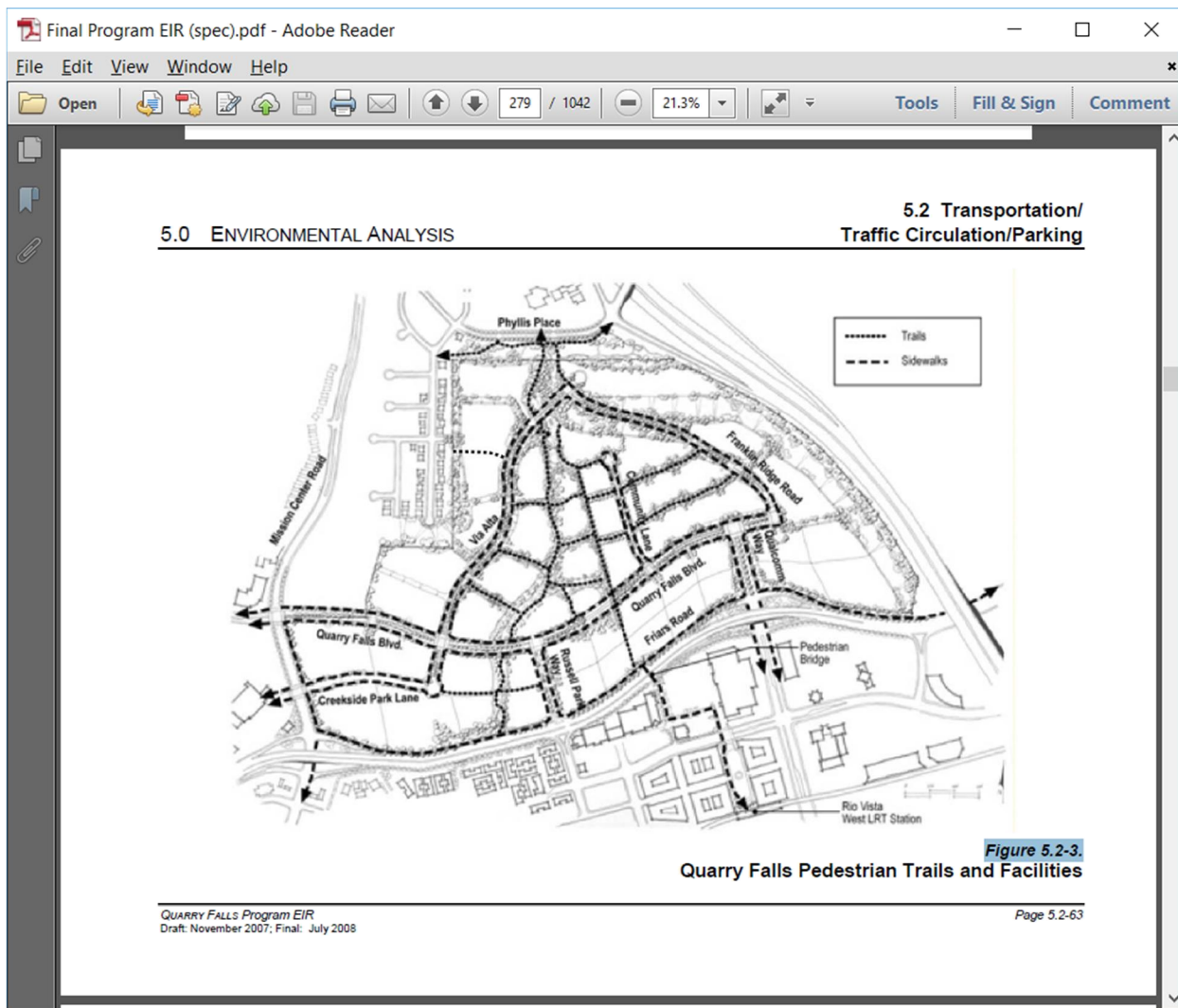
I-805 NB and SB Ramps and City View Church



CO-14
cont.

Trail from Civita to Serra Mesa

CO-14
cont.



Letter CO: Robert Ruzich

CO-1: The commenter states that the Serra Mesa Planning Group's review of the project addresses many of the points many people are asking and requests answers to both that review and his submittal of comments for the project.

This comment is an introductory statement indicating that specific comments are being provided. This comment does not raise any specific issues requiring a response pursuant to CEQA. The specific comments raised in the pages that follow are listed separately along with the City's individual responses.

CO-2: The commenter asks if the city reviewed the weight capacity of the Murray Ridge Road/Phyllis Place Road bridge that crosses over the 805 freeway for max loading of all 5 lanes with semis fully loaded on the bridge, and if any seismic estimation has been calculated across the bridge with the same situation.

The bridge crossing at I-805 and Murray Ridge Road/Phyllis Place Road is not included as part of the proposed project and is not analyzed in the DEIR. The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road.

CO-3: The commenter questions how much all the traffic mitigation measures are expected to cost for the long term view through 2035 and how much of this cost would be covered by the tax payers of San Diego.

This comment raises an economic issue unrelated to the environmental analysis provided in the DEIR. The comment does not address the adequacy of the DEIR.

CO-4: The commenter questions if the expansion of Franklin Ridge Road between Civita Boulevard to Via Alta from 2 lanes to 4 lanes will be at the expense of the tax payers.

This comment raises an economic issue unrelated to the environmental analysis provided in the DEIR. The comment does not address the adequacy of the DEIR.

CO-5: The commenter quotes a statement regarding Project Initiation of the proposed roadway connection from the Mission Valley Community Plan and questions if Civita property owners have been surveyed, if they are in agreement on the roadway, and if the majority want the road.

The policy concerning the road connection within the Mission Valley Community Plan states "the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels." This policy directs engineering studies to include the participation from Quarry Falls LLC, the property owners where the alignment is being proposed. The policy does not indicate a community survey will be completed for the alignment as suggested by the comment. Please refer to Section 3.2.1, Project Initiation, within the Project Description of the DEIR for additional project information and participation from the property owners.

CO-6: The commenter questions why the proposed roadway connection, presented in the Quarry Falls EIR as Alternative 4, is still being pushed by the City when neither Mission Valley nor Serra Mesa want it.

The proposed project will benefit the community as it meets all five of the project's objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

Please note that the City Council has not approved the project at this time and will consider whether or not the specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant environmental effects, as documented in the Statement of Overriding Considerations. This comment is the opinion of the commenter and does not raise an issue with the environmental analysis within the DEIR.

CO-7: The commenter questions why not utilize the existing 8 east on ramp at Texas Street/Qualcomm Way and place a connector from that on ramp to the 805 on ramp.

The proposed roadway connection provides a connection between the Serra Mesa and Mission Valley communities. Alternative options for providing freeway ramp access were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. No changes to the FEIR are required.

CO-8: The commenter questions how the proposed roadway connection will make traffic circulation better and if Caltrans is going to be expanding or widening the 805 freeway.

Please see the responses to comments G-32 and G-42 regarding traffic circulation associated with the proposed project.

Regarding the commenter's question of whether Caltrans will be expanding or widening the I-805, any potential future freeway improvements are not part of the proposed project, and therefore are not analyzed in the DEIR. The comment does not raise issue regarding the adequacy of the DEIR.

CO-9: The commenter questions why the City will not work with Caltrans in a combined effort to tie Mission Center Road into the 805 freeway.

This comment discusses other regional transportation improvements not associated with the proposed project and does not address the adequacy of the DEIR.

CO-10: The commenter questions the City's plan in regard to mass transportation in Mission Valley.

The addition of mass transit through Mission Valley is not a component of the proposed project, and therefore is not analyzed in the DEIR. The comment does not raise issue regarding the adequacy of the DEIR.

CO-11: The commenter questions if the City will appraise homes in Civita and Serra Mesa prior to and after the road connection and mitigation measures to see the true impact the proposed project will have to property values.

Per CEQA Guidelines, the EIR does not analyze economic impacts, only environmental impacts resulting from the proposed project. The economic effects of project, including any effects on property values, are not issues that are under the domain of CEQA unless it is attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR.

CO-12: The commenter questions if the Police Department has been asked what additional crime they estimate will happen in Civita and Serra Mesa because of this road connection and if additional police will be assigned to patrol these areas because of the road connection.

This comment is similar to comment O-1. Please see the response to that comment.

CO-13: The commenter questions how the City will address panhandling on the corners of the road connection if it is approved and built.

Panhandling is generally not considered an issue subject to CEQA, unless crime results in a physical impact on the environment. Accordingly, the DEIR does not consider panhandling in the context of CEQA and the determination of environmental impact because direct social and economic effects, such as project effects related to panhandling, are not considered significant impacts under CEQA.

CO-14: The commenter provides a copy of the Serra Mesa Planning Group's comment letter dated May 18, 2017. Please see Letter G, responses to comments G-1 through G-212.

EFRAIN CONRIQUE
2025 Ainsley Road
San Diego, CA 92123
conrique1@earthlink.net

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

May 29, 2017

RE: Serra Mesa Community Plan Amendment
Roadway Connection Project
Project No. 265605

Dear Ms. Morrison,

Introduction

CP-1

I have been the property owner and resident at the above Serra Mesa address since 1964 and have had the opportunity for civic service as member and chairman of various San Diego City and County commissions, boards, community councils, and other groups, ---- and recently, with some 20 civic-minded Serra Mesa residents in the Committee of the Serra Mesa Planning Group (SMPG) charged with making its recommendations to the SMPG Board, for its response to the City on its March 29, 2017, Recirculated Draft Environmental Impact Report (DEIR) for a proposed Road Connection Project (Franklin Ridge Road Extension), and where, to fulfill its obligations, the Committee undertook several hundred of man hours studying and analyzing this DEIR.

Since I also was the Chairman of the Committee of the Serra Mesa Park and Recreation Council (SMP&RC) for the 2013 study and coordination of Serra Mesa residents with Civita management and its Park Design Consultants that led to the preparation and approval of the Conceptual Designs for the Phyllis Place Park that Civita is obligated to construct, and that are included as Figure 3-5a and 3-5b of the DEIR, ---- my comments herein are primarily focused on the impacts that the proposed Franklin Ridge Road connection would have on the configuration, safe access, and enjoyment of the future linear Park running along Serra Mesa's Phyllis Place.

CP-2

I would appreciate your comments and responses on each of my following observations and questions:

Queries

CP-2 cont.	<p>○ To meet the mandated area of 1.33 total useable acres (net of roads, curbs and sidewalks) for Phyllis Place Park, construction of the proposed Franklin Ridge Road connection bifurcating Phyllis Place Park, would require that a significant portion to be extended easterly, and thus converting a mini-park facility of 1.33 acres into 2 disparate parts separated through a busy 5-lane signalized intersection, ---- with the westerly portion then effectively becoming only a passive-activities 'parklet' of about 0.8 acres (with some amenities), and the easterly portion, at a higher elevation and across a major street, likely limited to a configuration of essentially a landscaped area of about 0.5 acres.</p> <p>By comparison, the not too-long-ago 'expanded' downtown passive-use Horton Plaza mini-park encompasses a contiguous and level 1.3-acres facility.</p>
CP-3	Therefore, because of the segmentation,
CP-4	<ul style="list-style-type: none"> • How much will the easterly portion need to be elongated along Phyllis Place to meet the mandated net 1.33-acres requirement? • And then, also necessitating that the existing Phillis Place road be widened to 5-lanes, from its existing 2-lane configuration, will the slopes of the easterly and southerly areas of both resulting park portions needing to be expanded, and re-graded for ADA-compliant access by persons with disabilities throughout the full 1.33 acres mandatory of park area?
CP-5	<ul style="list-style-type: none"> • Has the additional re-grading work been studied regarding impact to protective wild life and/or loss of environmentally sensitive areas? If so, what methods are contemplated for their mitigation? If none, why not?
CP-6	<ul style="list-style-type: none"> • Or, will new studies and Reports be required to certify the absence of any of the above conditions, or the conditions for their mitigation, and, if not, why not?
CP-7	<ul style="list-style-type: none"> • Will the portion connecting Phyllis Place to the Franklin Ridge Road /Via Alta connection be dedicated as a City Street? If not, please provide an explanation for this omission.
CP-8	<ul style="list-style-type: none"> • Additionally, a dimensioned metes-and-bounds map of the final configuration and elevations of the connecting road and the as-segmented plots should be prepared. When will that map be prepared?
CP-9	<p>○ The specific proposed location and configuration of the Franklin Ridge Road connection to Via Alta and beyond to Friars Road is putatively designed for an additional route through Civita, but the resultant auto, truck and bicycle traffic would greatly impact the safety of park-using children and other pedestrians at the existing Phyllis Place and general neighborhood;</p>

CP-9 cont.	increase scarcity of off-street parking surrounding the mandated-to-be-constructed Phyllis Place Park; and the increased demand will heavily impact access to parking adjacent to the contemplated Park (including handicapped persons' parking).
CP-10	Please take specific note that the DEIR , itself, projects in its Table 5.2-21 and other instances that construction of the proposed Road Connector to the intersection of Via Alta and Franklin Ridge Road would attract auto and truck traffic, through the park, just toward the immediate South-bound I-805 ramp, of 23,555 ADT, and 35,540 ADT at Phyllis Place, ---- and also significant additional traffic to-and-from different destinations.
CP-11	<p>Even worse, this auto and truck traffic access to Friars Road through the signalized intersection at Phyllis Place will promptly produce a massive bottleneck at Via Alta and Franklin Ridge Road. This will nescetitate the widening of Via Alta and Franklin Ridge Road to at least 4-lanes towards, ---- and until they meet Friars Road or Mission Center Road..</p> <ul style="list-style-type: none"> • Are there plans to prepare amendment of the Mission Valley Community Plan to provide for these streets' widenings? When is this proposed to occur? If not, why is a Serra Mesa Community Plan Amendment being pursued without a companion coordinated amendment to the Mission Valley Community Plan?
CP-12	<ul style="list-style-type: none"> • Is an amendment required to the "Park Development Agreement for The Quarry Falls (Civita) Development Project" Filed Nov. 27, 2012 , or what other methodology or process is required to proceed with the planning for the widening of these streets?
CP-13	<ul style="list-style-type: none"> • Will the higher-traffic capacity upgrades to Franklin Ridge Road and Via Alta be required to be built according to the City's own "<i>Street Design Manual</i>? If not, what is the rationale for deviating from the City's own standards?
CP-14	<ul style="list-style-type: none"> • Who will fund the design and construction costs for these widenings, and are those funds, available and committed? If it is the developer that will fund the design and construction, when the widening of these streets gets accomplished, will the streets be conveyed to the City and designated as <i>dedicated streets</i>? If not, please provide an explanation for not doing it.
CP-15	<ul style="list-style-type: none"> • If these widenings are not yet planned to be built to carry the increased traffic that will be generated by the construction of the 5-lane connector to Phyllis Place, why is the portion in Serra Mesa even being considered at this time? And please provide an explanation for not mandating the approval for these widenings as a prerequisite for considering the Franklin Ridge connector.

Conclusions and Recommendations

○ Absent resolution of these items and the many others delineated in the May 18 letter of the Serra Mesa Planning Group, I conclude and suggest that the present DEIR document should NOT be approved.

Further, this DEIR and consideration of the proposed Road Connection are wholly premature absent previous pursuit and completion of the following:

a.- An amendment to the Mission Valley Community Plan to include the widening of Via Alta and Franklin Ridge Road;

b.- Preparation and approval of a Mission Valley centered EIR supporting such an Amendment to the Mission Valley Community Plan;

c.- City Council approval of the Mission Valley Community Plan that include such improvements;

d.- Identification of the source committed for the design and construction costs of these improvements; and,

e.- Specification that upon completion these widened roads are to be conveyed to the City and dedicated as City roads; and,

f.- The well-based expectation, not just conjecture, that funding for those road widenings will actually occur within a specified date of construction.

○ But, even the theoretical construction of such a road cannot seriously even be considered since by the various projections contained in this EIR, the traffic densities at the envisioned Phyllis Place and Franklin Ridge Road signalized intersection would result in complete blocking of any in-and-out auto access to the long-established more than 220 homes and the senior-living complex immediately west of that intersection.

In the face of these realities, of the 3 options offered by this DEIR, what option and under what rationale can even be considered, other than the No Build option?

Thank you for your attention to all of my observations and questions, and I look forward to receiving your responses.

Sincerely,

Efrain Conrique

Copy to:

- Serra Mesa Planning Group

- Alyssa Muto, Deputy Director
San Diego City Planning Department

Annotated copies to City Councilmembers:

- Sherri Lightner
- Lorie Zapf
- Todd Gloria
- Myrtle Cole
- Mark Kersey
- Chris Cate
- Scott Sherman
- David Alvarez
- Marti Emeral

Letter CP: Efrain Conrique

CP-1: The commenter provides personal history and some background of involvement in the Serra Mesa community with civic groups and with the conceptual designs for Phyllis Place Park. The commenter indicates that comments are primarily focused on the effects of the proposed roadway connection on the configuration, safe access, and enjoyment of the future Phyllis Place Park.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments CP-2 through CP-17 below.

CP-2: The commenter provides a description of the mandated area of Phyllis Place Park with the proposed roadway connection segmentation, and makes a comparison with the Horton Plaza mini-park.

This comment summarizes the commenter's opinion on the potential configuration of Phyllis Place Park as a result of the proposed roadway, but does not specifically raise issue regarding the adequacy of the DEIR. The comment does not raise any specific environmental issues.

CP-3: The commenter questions how much the easterly portion of the park will need to be elongated along Phyllis Place to meet the mandated net 1.33-acre requirement.

The Quarry Falls developer has processed two General Development Plans for the park, which were approved by the City Council: one for if the road connection were to occur and another for if it were not to occur. In either case, the acreage within the park would remain the same. Please see Figures 3-5a and 3-5b of the DEIR, which depict the elongated southern portion of the park on the westerly side.

As stated in Section 3.2.2 of the DEIR, "the City is not proposing to construct or fund the roadway connection but only to analyze the environmental effects of its construction and operation, as directed by the City Council. It is anticipated that the Quarry Falls developer would implement the proposed project; however, the proposed project could be implemented by another entity." The acreage of the park to be elongated to meet the mandated net 1.33 acre requirement is the responsibility the Quarry Falls developer and is not a proposed project component. The comment does not raise issue regarding the adequacy of the DEIR.

CP-4: The commenter questions expansion of the easterly and southerly slope areas of the park and regrading for ADA-compliant access with respect to the widening of Phyllis Place from 2 to 5 lanes.

Please see the response to comment BU-4. The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road. The comment does not raise issue regarding the adequacy of the DEIR.

CP-5: The commenter questions if the additional re-grading work has been studied regarding impact to wildlife and/or loss of environmentally sensitive areas and if so, what are the mitigation methods.

Please see the responses to comments CP-3 and CP-4. The reconfiguration of the future Phyllis Place Park is not part of the proposed project, and therefore was not analyzed in the DEIR.

CP-6: The commenter questions if new studies and reports will be required to certify the absence of any of the above conditions or the conditions for their mitigation.

Please see the responses to comments CP-3 and CP-4. The reconfiguration of the future Phyllis Place Park is not part of the proposed project, and therefore was not analyzed in the DEIR.

CP-7: The commenter questions if the portion connecting Phyllis Place to Franklin Ridge Road/Via Alta will be dedicated as a City street.

Once constructed, the proposed roadway connection would become part of the City's street system. As stated in Section 3.2.2 of the DEIR, "the proposed roadway connection can be accomplished with a public street easement dedication, which is a ministerial decision (Process 1) involving an administrative City staff level review. An amendment to add the roadway connection to the parkland in the SDP as part of this ministerial process, may include but not be limited to associated mapping actions, the dedication of the roadway easement, and construction review of any other associated public improvements that may be required as part of the project."

CP-8: The commenter expresses their opinion that a dimensioned metes-and-bounds map of the final configuration and elevations of the connecting road and the as-segmented plots should be prepared and questions when that map will be prepared.

The final design for the proposed roadway connection will occur at a time yet unknown, after City Council approval of the FEIR and Serra Mesa Community Plan Amendment for the proposed project, and prior to construction of the roadway connection. The necessary final engineering design and construction drawings will be prepared at that time to demonstrate conformance with applicable City regulations, including the City's Street Design Manual (2002). The comment does not raise issue regarding the adequacy of the DEIR.

CP-9: The commenter states that the specific proposed location and configuration of the Franklin Ridge Road connection to Via Alta and beyond to Friars Road is putatively designed for an additional route through Civita and expresses their opinion that the resultant auto, truck, and bicycle traffic would impact the safety of park users, decrease off-street parking for Phyllis Place Park, and impact access to parking adjacent to the contemplated park.

Please see the response to comment G-37 regarding pedestrian safety at the future Phyllis Place Park. The potential for safety issues associated with the proposed project is also detailed in Section 5.2, *Transportation and Circulation*, of the DEIR. As detailed in Section 5.2, no potential safety hazards were identified in relation to Phyllis Place Park. Regarding the commenter's concerns related to decreased parking, the commenter does not provide any substantial evidence as to how the proposed roadway connection would reduce off-street parking for either Phyllis Place Park or the "contemplated park."

CP-10: The commenter refers to Table 5.2-21 and other instances in the DEIR that construction of the proposed road connector to the intersection of Via Alta and Franklin Ridge Road would attract auto and truck traffic through the park, toward the I-805 southbound ramp, of 23,555 ADT and 35,540 ADT at Phyllis Place, and also significant additional traffic to-and-from different destinations.

This comment repeats information provided in Section 5.2 of the DEIR, but does not raise issue regarding the adequacy of the environmental analysis contained within.

CP-11: The commenter states that the auto and truck traffic access to Friars Road through the signalized intersection at Phyllis Place will produce a massive bottleneck at Via Alta and Franklin

Ridge Road, necessitating the widening of Via Alta/Franklin Ridge Road. The commenter questions if there are plans to amend the Mission Valley Community Plan to widen these streets.

The potential impacts of the proposed roadway connection on the transportation facilities within the traffic study area, as well as any required mitigation measures to reduce impacts, are identified and fully disclosed in Section 5.2, *Transportation and Circulation*, of the DEIR. As indicated in Section 5.2, all potential impacts along Via Alta, under both near-term (year 2017) and long-term (year 2035) scenarios, would be below the applicable City's thresholds, and therefore would be less than significant. As further detailed in Section 5.2, the proposed project would result in a significant impact at the roadway segment of Franklin Ridge Road from Civita Boulevard to Via Alta. As a result, mitigation is identified to reduce significant impacts. MM-TRAF-8 requires the widening of Franklin Ridge Road to accommodate two lanes in each direction and a center left-turn lane. Implementation of this measure would reduce the impact to a level below significance. However, as discussed in Section 5.2, the City's ability to implement this measure may be limited. This roadway would provide Class II bikeways and a 6-foot-wide sidewalk, separated from the street by an 8-foot-wide parkway; some of these amenities would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, the analysis in the DEIR did not assume it would occur. The widening of Franklin Ridge Road, as required by MM-TRAF-8, would be evaluated at a future date, at which time detailed engineering plans would be developed to determine its feasibility.

Regarding plans to amend the Mission Valley Community Plan, the widening of Via Alta/Franklin Ridge Road is not included as part of the proposed project and is not analyzed in the DEIR. The proposed project as analyzed in the DEIR is only for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road; however, the Mission Valley Community Plan is currently in the process of being updated.

CP-12: The commenter questions if an amendment to the "Park Development Agreement for the Quarry Falls (Civita) Development Project" is required for the widening of these streets.

Please see the response to comment CP-11. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). In addition, the proposed roadway connection would not result in any loss of park space. Therefore, no changes to the "Park Development Agreement for the Quarry Falls (Civita) Development Project" would be required.

CP-13: The commenter questions if the higher traffic capacity upgrades to Franklin Ridge Road and Via Alta will be required to be built according to the City's own "Street Design Manual."

Please see the response to comment CP-11. No changes are proposed to the roadway segment of Via Alta. Additionally, while the widening of Franklin Ridge Road from Via Alta to Civita Boulevard, as required by MM-TRAF-8, would reduce potentially significant impacts to less than significant levels, it would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, the analysis in the DEIR did not assume it would occur. However, the

proposed roadway connection and access points have been conceptually designed to be consistent with the City's Street Design Manual, as further detailed in response to comment F-4.

CP-14: The commenter questions who will fund the design and construction costs for these widenings, and if they will be conveyed to the City and designated as dedicated streets if they are to be designed and constructed by the developer.

Please see the response to comment CP-11. As discussed in Chapter 3.0, Project Description, of the DEIR, the City is not proposing to construct or fund the roadway connection but only to analyze the environmental effects of its construction and operation, as directed by the City Council. It is anticipated that the Quarry Falls developer would implement the proposed project; however, the proposed project could be implemented by another entity. The Quarry Falls developer is currently subject to the Mitigation Monitoring and Reporting Program (MMRP) that was approved as part of the Quarry Falls PEIR, including mitigation for traffic impacts. That MMRP assumed that there would not be a roadway connection because the City Council directed the planning staff to further analyze the connection. However, Alternative 4 within the Quarry Falls PEIR included mitigation measures for the roadway connection.

This EIR analyzed and recommends mitigation for certain issues that were previously analyzed in the Quarry Falls EIR. To the extent this EIR identifies mitigation for any impact that was also identified in the Quarry Falls EIR and for which mitigation was previously imposed, the mitigation identified in this EIR should be considered to take precedence because its analysis is based on updated data. For example, it includes an updated traffic study (Appendix C). Therefore, if the road connection (i.e., the proposed project) were to be implemented, the developer of that project would be required to adhere to the traffic/transportation mitigation measures included within this EIR. As a result, with respect to study locations where the two EIRs are congruent, implementation of the mitigation measures included within Section 5.2, *Transportation and Circulation*, would supersede corresponding traffic/transportation mitigation measures within the Quarry Falls EIR, provided that the Quarry Falls developer demonstrated to the satisfaction of the City Development Services Department that the mitigation sufficiently addresses that impact. To the extent the Quarry Falls EIR studied locations that were not studied in this EIR, the mitigation identified in the Quarry Falls EIR for those impacts would not be affected.

CP-15: The commenter questions if these widenings are not yet planned to be built to carry the increased traffic that will be generated by the construction of the 5-lane connector to Phyllis Place, why is the portion in Serra Mesa even being considered at this time. The commenter asks for an explanation for not mandating the approval for these widenings as a prerequisite for considering the Franklin Ridge connector.

The analysis of potential transportation and circulation impacts associated with the proposed project included all of the transportation facilities in the traffic study area, which included facilities in both the Mission Valley and Serra Mesa communities. The specific widening improvements were identified as mitigation for direct project-level impacts, regardless of whether they occurred in Mission Valley or Serra Mesa. If the proposed roadway were constructed, all feasible mitigation measures identified in the EIR are required to be completed prior to commencing construction of the proposed roadway. Moreover, all of the feasible mitigation measures identified in the EIR would be included in the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project, which essentially mandates the implementation of each mitigation measure. In addition to certifying

the FEIR, the City Council would also adopt the MMRP, which would ensure that all feasible mitigation measures are implemented.

CP-16: The commenter provides a list of Conclusions and Recommendations as to why the DEIR should not be approved and reasons why the DEIR and proposed roadway connection are premature.

This comment generally summarizes the concerns raised in comments CP-3 through CP-15. Please see the responses to those comments.

CP-17: The commenter provides closing statements regarding the submitted comments. This comment is a conclusory statement and does not raise any specific issues requiring a response pursuant to CEQA.

From: jwarika@roadrunner.com
Sent: Tuesday, May 30, 2017 3:10 PM
To: PLN_PlanningCEQA
Cc: 'Jim Warika'
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Attachments: Via_Alta_ Questions.docx

- Previous questions sent via e-mail may have had formatting problems during transmission. If these continue in the following text, please see the attached .doc file.
- CQ-1** | Reference the planned construction involving Via Alta in the Civita Development:
- Via Alta is a winding, single-lane (each direction) road with limited visibility due to trees, etc. The current speed limit is 30 mph (based on the speed indicators in place along Via Alta);
- CQ-2** | Question 1] Does the plan include widening and straightening Via Alta and increasing the posted speed so the street can serve as a multi-lane access road?
- CQ-3** | Question 2] If so, what will be the impact on the housing developments that now line Via Alta?
- CQ-4** | Questions 3 and 4] The current left hand turn lanes are short, and only allow two or three cars before spilling out onto the through lane. Will these turn lanes be lengthened, and if so, how? If not, what will be impact on traffic flow during rush hours?
- CQ-5** | Questions 5 and 6] Traffic onto Via Alta from the side streets (Shutter Lane, Distinction Drive, etc.) is already somewhat dangerous due to the limited visibility and the excessive speed of some drivers. What steps will be taken to address this issue in view of the much heavier projected traffic? Will there be stop lights and/or four-way stop signs?
- CQ-6** | Question 7] There is no pedestrian crossing between the bottom of Via Alta and the path under the bridge at the top of Via Alta; will additional crossings be added, and what protection will there be for pedestrians (e.g., stop lights? Four-way stop signs?)
- CQ-7** | Question 8, 9, and 10] There is an elementary school projected at the bottom of Via Alta; what provisions will be made for the safety of the children going to and from the school, and during school hours? One standard safety requirement is to reduce the speed limit; is this planned? If so, how will it affect the traffic flow?
- CQ-8** | Questions 11 and 12] Via Alta currently has bicycle lanes. Will these be retained if it becomes a freeway access road? If so, will there be any additional safety features since bicycle lanes are generally incompatible with freeway traffic?
- CQ-9** | Question 13] Much the current traffic on Via Alta is slow, less than 15 mph. This includes construction equipment and “golf carts” used by Civita for security, landscaping support, etc. Will these still be allowed on Via Alta as a freeway connector?

CQ-10 | Thank you for your attention. I look forward to receiving your responses.

James Warniak
2369 Aperture Circle
San Diego CA 92108
310 341 8800

Letter CQ: James Warniak

CQ-1: The commenter references Via Alta in the Civita Development and summarizes the characteristics of Via Alta.

This comment describes the existing physical characteristics of Via Alta, but does not raise issue regarding the adequacy of the DEIR. The comment does not raise any specific environmental issues.

CQ-2: The commenter questions if the plan includes widening and straightening Via Alta and increasing the posted speed.

No changes to Via Alta, including widening, straightening, or increasing the current posted speed limit, are proposed as part of the project. The proposed project as analyzed in the DEIR is for the proposed roadway connection that would extend approximately 460 feet south from Phyllis Place to Via Alta/Franklin Ridge Road. The comment does not raise issue regarding the adequacy of the DEIR.

CQ-3: The commenter questions if widening and straightening Via Alta is part of the plan, what the impact will be on the housing developments that line Via Alta.

Please see the response to comment CQ-2.

CQ-4: The commenter questions if the current left hand turn lanes will be lengthened and what the impacts will be on traffic flow during rush hours.

Please see the response to comment CQ-2. The proposed project does not propose any changes to Via Alta, including the lengthening of any existing left-hand turn lanes.

CQ-5: The commenter refers to traffic onto Via Alta from side streets in terms of limited visibility and excessive speed and questions what steps will be taken to address this issue in view of heavier projected traffic. The commenter also ask if there will be stop lights and/or four-way stop signs.

This comment is similar to comment W-1. Please see the response to that comment.

CQ-6: The commenter states that there is no pedestrian crossing between the bottom of Via Alta and the path under the bridge at the top of Via Alta and questions if there will be additional crossings added, and what protection will there be for pedestrians.

This comment is similar to comments F-4 and F-5. Please see the responses to those comments.

CQ-7: The commenter asks what provisions will be made for the safety of children in relation to the planned elementary school at the bottom of Via Alta, and if a reduced speed limit is planned and how it will affect the traffic flow.

This comment is similar to comments F-4 and F-5. Please see the responses to those comments.

CQ-8: The commenter questions if the Via Alta bicycle lanes will be retained if it becomes a freeway access road and if there will be any additional safety features since bicycle lanes are generally incompatible with freeway traffic.

Please see the response to comment CQ-2. The proposed project does not propose any changes to Via Alta, including the removal of any existing bicycle lanes. Moreover, the proposed roadway is not

a freeway connector, but rather provides a multi-modal linkage between the Mission Valley and Serra Mesa communities. Therefore, there would not be incompatibilities with “freeway traffic.”

CQ-9: The comment states that much of the current traffic on Via Alta is less than 15 mph, and includes construction equipment and golf carts used by Civita for security, landscaping support, etc., and questions if these will still be allowed on Via Alta as a freeway connector.

The conceptual design speed for the proposed roadway connection is 55 miles per hour. The posted speed for the roadway would very likely be reduced from the design speed because of the relatively short length of the connection, which would transition into a residential area. The posted speed limit would most likely be much less than 55 miles per hour; however, the posted speed cannot be determined before the facility is in operation and is based on the roadway classification. After the project is completed, the City will resurvey the roadway traffic and set the posted speed limit according to the results of that survey. The posted speed would not exceed the design speed, and safety would be a primary consideration for the limit set. Additionally, the proposed project does not propose any changes to the existing posted speed limit along Via Alta. Moreover, the proposed roadway is not a freeway connector, but rather provides a multi-modal linkage between the Mission Valley and Serra Mesa communities.

CQ-10: The commenter provides closing statements regarding the submitted comments. This comment is a conclusory statement and does not raise any specific issues requiring a response pursuant to CEQA.

From: Tim Fleming <timfleming@hotmail.com>
Sent: Tuesday, May 30, 2017 12:20 PM
To: PLN_PlanningCEQA
Cc: local@sduniontribune.com
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 201201104

This is a voter and early Civita resident asking why are you allowing even the consideration of a freeway access feeder ?

I moved into Mission Valley before Civita project construction started. I've rented and now purchased in the community. I've read completely the planning documents since the 1990s regarding the quarry in the quarry falls project now called Civita. Followed the marketing pitches by the developer, listened to Communities and residents such as Sierra Mesa pass statements AGAINST such an access road.

It was clear to me in the Civita PLAN that the design was to be a walkable community with limited parking for vehicles, narrow roads needing slow speeds and encouraging shared electric cars rentals. Every drawing and design in all plans DID NOT include adding high vehicular traffic freeway exits at north end Via Alta. It will become a GPS cut through for grocery shoppers with significant risk to residents / pedestrians.

Even now without the freeway access, on a daily basis, I witness high risk pedestrian street crossings as cars speed down hill one lane via Alta. I can only imagine how dangerous it will be if it becomes a main artery feeding traffic to a freeway. What are the civil engineers thinking who are designing? - they have to realize there are going to be deaths if you feed a major freeway into it.

If this exit does go through Civita's Frame and Focus association needs to consider moving our community vehicle entrance to west side; Ainsley and make the east side on Via Alta a pedestrian entrance only. Because it will be almost impossible to "safely exit or enter" onto via Alta with a car much less on foot or walking your dogs or walking a baby carriage..... Planning commission needs to walk around up here and see what the trouble is going to be in that it would be smart not to do this.

If not, you can count on more community uprising with legal and election impacts in the future. So where do the planners live who are pushing this? Up for a car rally?

Tim J Fleming
Civita Resident
2609 Aperture Circle
San Diego, CA 92108

CR-1

Letter CR: Fleming, Tim

CR-1: The commenter expresses opposition to the proposed project, provides some personal history and reasons for purchasing a home in Civita, and describes an understanding of the intent of the Civita development to be a walkable community with limited parking, narrow roads with slow speeds, and encouraging shared electric car rentals. The commenter describes speeding that currently occurs along Via Alta and expresses concern regarding potential danger to pedestrians and vehicles entering and exiting the Civita community due to the increased traffic and high speed of vehicles that would utilize the proposed roadway connection.

This comment raises issues similar to those described in comments G-50, F-2, F-4, and F-5. Please see the responses to those comments. The comment expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety and speeding vehicles, but does not specifically raise issue regarding the adequacy of the DEIR. Moreover, all the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. This comment also describes existing conditions related to speeding vehicles along Via Alta. As these are existing conditions, and not related to the proposed project, no response is required. Please also see response to comment W-1 regarding traffic calming measures. During final design of the proposed roadway, the City will consider whether traffic-calming measures are necessary to ensure pedestrian safety. No changes to the FEIR are required in response to this comment.

From: Sarah K <sarahkinnings@gmail.com>
Sent: Tuesday, May 30, 2017 10:35 AM
To: PLN_PlanningCEQA
Cc: Billy Lambon
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048

To Whom it May Concern,

CS-1

We were extremely concerned to learn that the City of San Diego is considering creating a freeway connector running directly through the middle of Civita. We have been proud homeowners within Altana, a community situated on Via Alta, for more than 3 years, and were originally sold on Civita for several reasons, in particular its forward thinking concept of combining living, playing, working and raising a family in San Diego's newest walkable community. If such plans were approved, the freeway connector would essentially cut Civita in half and the promise of a walkable community would be completely destroyed.

CS-2

The potential freeway connector is a road that we and countless other residents cross daily. In the event that the connector road is approved, the amount of projected traffic would mean that crossing it would be extremely dangerous without walking a considerable distance either down to the traffic lights at Civita Blvd or beyond the bridge at the summit of Civita. We also understand neither speed bumps nor cross walks would be approved between the traffic lights and the bridge. Due to the steep incline of Via Alta, excess speed would add additional dangers to walkers, bikers and those coming and going to and from the various communities located on either side of what would essentially become a major road.

CS-3

Another important reason why the freeway connector should be shelved is the likely increase in crime through easy freeway access. Unsurprisingly, research has shown that communities that are easily accessible experience more crime than areas with restricted access and complicated street patterns. A recent study found that the more entrances to a community, the more crime in that community. Research supports the idea that burglars avoid communities in cul-de-sacs, or where ease of escape is inhibited. Approval of the freeway connector would undoubtedly cause a surge in crime rates in Civita.

CS-4

Both ourselves and all other Civita homeowners that we have spoken to are strongly opposed to the freeway connector, having all been sold on the same promise of a walkable community. Hopefully the opinions of the residents of Civita will be strongly considered when making the final decision, and Civita will fulfill its advertised role and full potential as San Diego's newest walkable community.

Yours Faithfully,

Mr. Billy Lambon and Dr. Sarah Kinnings

7927 Altana Way
San Diego, CA 92108

Letter CS: Mr. Billy Lambon and Dr. Sarah Kinnings

CS-1: The commenters provide a personal history and reasons for purchasing a home in Civita. The commenters express opposition to the proposed roadway connection, citing that the project will divide Civita and affect walkability.

This comment is similar to comments F-2, F-4, F-5, and G-102. Please see the responses to those comments. This comment raises concerns related to the proposed roadway connection dividing the community and affecting walkability, but does not specifically raise issue regarding the adequacy of the DEIR.

CS-2: The commenter states concerns for crossing the proposed roadway connection and excess speed dangers to the communities located along Via Alta.

The commenter's concerns regarding pedestrian safety are similar to those in comments F-4 and F-5. Please see the responses to those comments. Please also see response to comment W-1 regarding traffic calming measures.

CS-3: The commenters state concerns for an increase in crime as a result of the proposed roadway connector.

This comment is similar to comment O-1. Please see the response to that comment.

CS-4: The commenters state that they and other Civita homeowners are strongly opposed to the proposed roadway connection and hope that the opinions of residents are strongly considered in the final decision for the project and that Civita fulfills its role and potential as a walkable community.

This comment expresses opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR. All comments received as a part of the DEIR public review process become part of the administrative record and will be considered by the City during the decision-making process. In addition, three public hearings for the project will provide additional opportunities for the public to comment on the proposed roadway connection. .

From: Daniel James <danieljames4@gmail.com>
Sent: Tuesday, May 30, 2017 10:35 AM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048

Hello,

- CT-1 | My name is Daniel James and I am a resident of Civita at 2616 Aperture Circle in Mission Valley. I'm concerned about the possibility of a freeway connector being constructed near our home. My husband and I recently moved to San Diego and we chose our community because the intention is that it would be a walkable community that was nestled safely between the chaos of the 163 and 805 freeways. We are wholeheartedly against inviting that traffic into our lives.
- CT-2 | Our main concern is that this connector would benefit commuters only and that our streets would be flooded with cars driving too fast simply so they can skip a bit of traffic on the 805. There are already motorists who drive far too fast on the hill on Via Alta and this whole community is full of pedestrians, cyclists, children and families walking their dogs. There's just no way we won't be negatively affected by people passing through who don't care about our community like we do.
- CT-3 | An overwhelming majority of our community is against this connector - and I can't imagine the community of Serra Mesa looking forward to their way of life being turned on its head either.
- CT-4 | I would like to know:
1) Is the city seriously considering the input from residents of the affected communities or is this a done deal?
2) Should the connector be approved, are there plans for traffic lights to control the flow?
3) When will we know about the decision on the freeway connection?

Thank you for your time and consideration,

Daniel James and Steve McCrea
2616 Aperture Circle
San Diego, CA
92108
619.606.7375

Letter CT: Daniel James and Steve McCrea

CT-1: The commenters provide a personal history and reasons for purchasing a home in Civita. The commenters express opposition to the proposed roadway connection, citing increased traffic.

Please see the response to comment F-2. This comment states opposition to the proposed project and raises concerns related to increased traffic and walkability, but does not specifically raise issue regarding the adequacy of the DEIR. Moreover, this environmental concern raised by the commenter is analyzed, and the impacts are disclosed, in Section 5.2, *Transportation and Circulation*, of the DEIR.

CT-2: The commenters express general concerns regarding an increase in traffic and speeding vehicles with regards to pedestrian safety.

This comment describes existing conditions related to speeding vehicles along Via Alta. As these are existing conditions, and not related to the proposed project, no response is required. Please see the responses to comments F-4 and F-5 regarding pedestrian safety.

CT-3: The commenters state that the overwhelming majority of the community is against the proposed roadway connection and speculates that the community of Serra Mesa is against the project also.

Please see the response to comment F-2. This comment expresses opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

CT-4: The commenters ask if the City is seriously considering input from residents of the affected communities, if there are plans for traffic lights to control the flow of traffic, and when the decision will be made regarding the proposed freeway connection.

Please see the responses to comments F-4 and F-5 regarding pedestrian safety and internal circulation within Civita, as well as response to comment W-1 regarding traffic calming measures.

All comments received as a part of the DEIR public review process become part of the administrative record and will be considered by the City during the decision-making process. In addition, three public hearings for the project will provide additional opportunities for the public to comment on the proposed roadway connection. The decision for the proposed roadway connection will be made at the City Council hearing scheduled for fall 2017.

From: rich cain <cain.rich@gmail.com>
Sent: Tuesday, May 30, 2017 1:38 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Attachments: RC EIR Letter 5-30-17.docx

Please find letter attached.

RC

Richard Cain

Cain.Rich@Gmail.com
619-559-8232
8424 Distinctive Drive - San Diego, CA 92108

5-30-17

To: Email: PlanningCEQA@sandiego.gov

Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection

Project No. 265605 SCH No. [2012011048](#)

From: Richard Cain - CAIN.RICH@GMAIL.COM

8424 Distinctive Dr. San Diego, CA 92108

CU-1

As a 1 year home owner/resident to Mission Valley in a Shea Home development I do not understand why this connector has even been considered to plow through a very residential community. I attended the presentation by the city at the Mission Valley Planning Meeting this month and was floored to see what your research and outcome has produced. Also have read the most recent EIR from March 20, 2017. Here are my concerns and questions.

CU-2

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side. a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?

b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?

2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?

3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger. a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?

b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?

c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?

d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?

e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?

4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities. a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four land, largely non-populated, canyon frontage street containing only one set-back small residential complex at the base of the street?

b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

5. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.

- Via Alta, one of the proposed main routes to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
- Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts...in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... Perhaps cutting one or two minutes from someone's commute (and even that is debatable).

"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection."

- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?

CU-2
cont.

CU-2
cont.

- Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
- What portions of the Recirculated DEIR address the four named objectives in the resolution?"
- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

Respectfully submitted,
Richard I. Cain

Letter CU: Richard Cain

CU-1: The commenter states that he is a Mission Valley home owner/resident who attended the Mission Valley Planning Group meeting on May 3, 2018, and has read the recirculated DEIR and generally opposes the project.

This comment is an introductory statement expressing the commenter's opposition to the proposed project and does not raise any specific environmental issues requiring a response pursuant to CEQA. Specific responses to the comments are provided below.

CU-2: The commenter's numerous comments and questions are verbatim with what is included in Save Civita's General and Technical Talking Points and Technical Comments and Questions About the DEIR for the Serra Mesa Community Plan Amendment Street Connection, which are included in Letter F. Please see the response to comments F-3 through F-6 and F-8 through F-11.

From: Deborah Bossmeyer <dbossmeyer@sbcglobal.net>
Sent: Tuesday, May 30, 2017 1:48 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Attachments: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048 Bossmeyer 5-30-17.pdf

Please find attached my comments and questions regarding the rejection of the Serra Mesa Community Plan Amendment Roadway Connection Project.

Deborah Bossmeyer
619-665-4107

May 30, 2017

Deborah Bossmeyer
7893 Stylus Drive
San Diego, CA 92108

Attention:

Ms. Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Sent via email: planningCEQA@sandiego.gov

Re: Serra Mesa Community Plan Amendment Roadway Connection Project No.265605

Dear Ms. Morrison:

The City of San Diego proposes construction of a 4-lane connector at Franklin Ridge and Phyllis Place to connect Mission Valley with Serra Mesa and the I-805 entrance/exit. If this happens, two streets in Civita, Via Alta and Franklin Ridge, both 2-lane residential streets are slated to serve as a primary freeway connector.

This year the City recirculated 2016's Draft EIR proposal (Environmental Impact Report). This second report still indicates that traffic volume within Civita on Via Alta and Franklin Ridge will be more than doubled. Projecting 34,117 ADT (Average Daily Trips) of regional traffic through Civita's residential district.

- If the Draft EIR proposal were solely intended to connect the divided communities of Mission Valley and Serra Mesa, the residents of Civita would warmly invite the connector. The reality is this is a proposal to alleviate regional traffic congestion within Mission Valley by introducing new freeway interchange collector streets to the I-805.
- At what cost? At the degradation of Civita, an Urban Land Institute award winning planned walkable village with 4,500 dwelling units and 1.2M sf of retail and office. Civita will be impacted by heavy volumes of non-stop regional traffic diminishing the community's walkability, pedestrian safety, village character, and environmental quality.
- The City has said to accommodate future growth, residents need to live in highly dense communities. Civita was designed for that purpose and the residents bought into the concept. But the City is also pushing to turn the streets in Civita into high volume freeway connectors. **This community cannot successfully serve two diametrically opposed purposes. It cannot be a safe walkable dense urban village and a conduit for freeway traffic at the same time.**
- Residents see themselves as Stewards of Civita, not NIMBYs. They are the ones that bought into the City's progressive plan of communities and parks for the future and

CV-1

CV-1
cont.

they are the ones that will make sure it succeeds.

- Home owners in Civita were surveyed and 95% of them are against the freeway connector.
- When Civita owners bought their homes,
 - the official Civita map showed a dead end at the top of the hill where Via Alta and Franklin Ridge connect. There were no indications on the map of the intention to connect the roads to Serra Mesa.
 - the home builder's sales agents downplayed the possibility of the freeway connector. buyers were told the connector "likely won't happen."
 - marketing/promotion materials touted Civita as the "perfect walkable community."
 - disclosures indicated the connector was a "possibility" not a definite. The 1985 Community Plan included the freeway connector as an "option" not definite.
- If the City has already factored this connector into their traffic studies for future growth in Mission Valley why did they not stipulate this clearly to buyers in Civita? It is apparent the City has planned for this connector all along, but Civita home owners were not informed of the City's true intention.
- If the home builders and developer thought that telling the home buyers about the freeway connector would sell homes they would have advertised it. But instead they went out of their way to downplay or omit the possibility of a freeway connector. This indicates they knew there would be difficulty selling homes if everyone knew their residential street was going to become a freeway connector.
- Civita owners are tasked with paying for the new Civita Park that is open to the public. The Civita maintenance assessment district is funded by annual charges of about \$200 to \$300 per housing unit. Adding up to \$600,000 in operational and maintenance cost with the City adding only a small percentage of \$60,000 per year.
 - Via Alta and Franklin Ridge surround the park on both sides. the Park becomes less desirable because of the noise, pollution, traffic, and safety risk the freeway connector will present.
 - The freeway connector will lower home values and create instability in the Civita housing market. This will put a greater burden on the owners who must pay for the public park.
- Via Alta is a thriving growing neighborhood with a parade of residents exercising, walking their dogs, pushing strollers, carrying babies in pouches, holding toddler's hands, etc. There is constant movement, up and down the street.
- There are no pedestrian crossings along Via Alta other than at Civita Blvd and the top of the ridge at Franklin Ridge. Continuous traffic will make it dangerous for residents to cross the street safely. Cutting off access for over 1,000 residents to Civita Park, Rec Center and future elementary school.
- There are few options to slow traffic and allow crossings on these streets. Because of the steep grade of Via Alta and Franklin Ridge cross walks are not allow and because

CV-1
cont.

of access for emergency vehicles, speed bumps not allowed.

- Residential units line both sides Via Alta from the base of the hill all the way up to the ridge. The home's front doors, porches, balconies, and bedrooms are no more than 10 to 15 feet from the street.
- Other connector streets for Mission Valley are in primarily non-populated areas. Except for commercial or residential located only at the base or top of the ridges, these connectors are surrounded by open canyon land on the sections leading in and out of the Valley. Those existing connections are Mission Village Road, Mission Center Road, Texas Street, and Bachman Place.
- Doesn't the City recognize how the high traffic on the streets of Murray Ridge in Serra Mesa, Texas Street in North Park, and Mission Village Road in Serra Mesa have diminished the quality of life for those residents? If we have learned in the past that heavily used roads in and out of Mission Valley are not conducive to residential neighborhoods, why would we consciously and intentionally make a primary residential street a freeway connector and subject its residents to the same problems these other streets are experiencing?

Instead of ruining more neighborhood streets why doesn't the City concentrate on fixing streets like Murray Ridge and Texas Street?

- Are there other improvements already approved for Mission Valley that will ease traffic congestion? Why doesn't the City wait to see how the impact the reconstruction of intersection of 163 and Friars Road improves traffic congestion? Why does the City have a connector that will destroy a neighborhood at the top of their list of priorities?
- Stop pushing outdated planning concepts. Where does it end, when does a City stop trying to accommodate an ever-increasing number of cars on the roads? The City will never be able to keep up and accommodate what could be an infinite number of cars with the growing population. Do you ruin every residential street to accommodate this demand? Or do you stop and realize this is a never-ending problem and needs a different solution?
- The City seems to be at odds with itself. It knows we need more mass transit for the future. It knows people's driving habits must change. But at the same time the City enables this behavior. How do you get people to stop driving when the City keeps building more ways for cars to go?
- Put the time and energy into improving and adding more mass transit in and through Mission Valley. Make it harder to use a car and make it easier to use alternative forms of transportation. Whatever the City does, DO NOT ruin a neighborhood in the process.
- GPS programs will indicate that cutting through Civita is the shortest route for cars from Mission Valley up to the 805. Drivers will not care they are going through a residential area.

Technical Comments and Questions about the Draft EIR for the Serra Mesa Community Plan Amendment Street Connection:

1. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). Each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.
 - a. Why are Via Alta and Franklin Ridge Road roadway segments, North of Civita Blvd, classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which would more appropriately fit their physical built character?
 - b. When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high-volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?
2. Did the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?
3. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.
 - a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita?
 - b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road?
 - c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road?
 - d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school?
 - e. How does the Draft EIR address pedestrian safety within the walkable community of Civita?
4. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.
 - a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four lane, largely non-populated, canyon frontage street

CV-1
cont.

containing only one set-back small residential complex at the base of the street?

- b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback?

5. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including:

- Potential new public transit corridors to reduce vehicles;
- Potential new Riverwalk trolley station and relocated trolley station at Mission;
- Valley Center to increase ridership;
- Potential new skyways to UCSD and University Heights;
- Planned and potential new walking multi-use paths;
- Planned and potential new cycling paths;
- Recommendations for roadway and connectivity improvements;
- Recommendations for new freeway interchanges and improvements;

Why is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community's guide to the future development of Mission Valley?

6. The Mission Valley Community Plan states on page 55, "Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa." The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?

Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City's vision for Civita as San Diego's next walkable village:

- The connector proposal encourages ~34,000 ADT of regional traffic through Civita's residential district;
- Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods;
- High traffic streets adjacent to residential has been shown to diminish quality of life;
- High traffic streets adjacent to residential has been shown to diminish property values;
- Impacts safe access to Civita Park;
- Impacts safe access to Civita's future grade school;
- Impacts safe access to Civita's future community center and dog park;
- Easy vehicular ingress/ egress in multiple directions increases crime rates;

CV-1
cont.

- Proposed regional traffic impacts residential neighborhoods;
 - Proposed regional traffic negatively impacts property values;
 - Proposed regional traffic impacts tranquility, peace and quiet;
 - Proposed regional traffic impacts nature, air quality and biology;
 - The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. Freeway connectors through this community's residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips.
 - Via Alta, one of the proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
 - Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
 - Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares.
 - Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (and even that is debatable).
7. *"The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." (p. 5) City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:*
1. *Whether police and fire response times would be improved with the road connection.*
 2. *Whether the road connection could serve as an emergency evacuation route.*
 3. *Whether it is feasible to make the road available for emergency access only.*
 4. *Whether pedestrian and bicycle access would be improved by the street connection."*
- Why weren't these objectives, as directed by the City Council, used in the studies and analyses?
 - Will the above information be added to the appropriate sections of the Recirculated DEIR? If not, provide an explanation for the exclusion.
 - What portions of the Recirculated DEIR address the four named objectives in the resolution?"

CV-1
cont.

- Basically, the report is studying something completely different from the original requests, which would make it illegal and useless.

I am a five-year resident of Civita, long time member of the Mission Valley Planning Group and a member of the MV Community Plan Update Subcommittee.

The health, wellbeing and safety of existing residents and homes should not be sacrificed in the name of progress. When this starts happening it is time to stop the direction we are going and re-access our goals and actions.



Respectfully,
Deborah Bossmeyer

Letter CV: Deborah Bossmeyer

CV-1: The commenter expresses opposition to the proposed roadway connection and repeats information from Comment Letter F (Save Civita).

The commenter's numerous comments and questions are verbatim with what is included in Save Civita's General and Technical Talking Points and Technical Comments and Questions About the DEIR for the Serra Mesa Community Plan Amendment Street Connection, which are included in Letter F. Please see the responses to comments F-2 through F-11.

From: Agnetha Stephenson <rastephen5@gmail.com>
Sent: Tuesday, May 30, 2017 2:36 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCHNo.2012011048

CW-1

We bought our house in a beautiful area and neighborhood. This is our last home where we plan on to live "Happily ever after" !!!
But, can we ???
Looks like you have no problems wanting to destroy life for many families with a crazy amount of cars that will drive thru our neighborhood 24/7 ?
This is no quality of life for anyone.

Please reconsider !
Ritchard & Agnetha Stephenson
8360 Summit Way
San Diego CA 92108

858-245--7830

Letter CW: Ritchard & Agnetha Stephenson

CW-1: The commenters provides personal history and reasons for purchasing a home in Civita. The commenters express opposition to the proposed roadway connection, citing increased traffic and quality of life issues.

Please see the response to comment F-2. This comment states opposition to the proposed project and raises concerns related to increased traffic and decreased quality of life, but does not specifically raise issue regarding the adequacy of the DEIR. In addition, issues raised by the commenter related to quality of life are not relevant to the substantial environmental analysis conducted pursuant to CEQA.

From: Pam Fleming <pamlfleming@hotmail.com>
Sent: Tuesday, May 30, 2017 5:06 PM
To: PLN_PlanningCEQA
Subject: Reject Serra Mesa Community Plan Amendment
Attachments: PEIR Opposition Letter to Planning Commission.docx

Dear Seth Litchney,

Please see the attached letter. Please do not approve the road connector.

Thank you,

Pam Fleming,
2609 Aperture Circle, San Diego

DATE: May 30, 2017

TO: Seth Litchney, Senior Planner, City of San Diego Planning Department

SUBJECT: Reject Serra Mesa Community Plan Amendment Roadway Connection Project

Project Name: Serra Mesa Community Plan Amendment Street Connection

Project No. 265605; SCH No. 2012011048

I am a resident of Mission Valley's CIVITA planned community and live in the Frame & Focus development located on Via Alta, which is the residential street proposed to be a main link between parts of Mission Valley and the so-called "connector road" leading to/from I-805.

CX-1 My husband and I lived at Aquara for five years and saw this great community being built. We are both close to retirement age. We wanted a community that was nearby transit, but also walkable. I did not envision a major freeway connector dividing Civita in our retirement years. The character of our community will be destroyed if the road connector is allowed.

We bought into the vision of a award winning walkable community of Civita.

As a resident, I see significant flaws in this plan- if the connector is approved.

- | | |
|------|--|
| CX-2 | <ol style="list-style-type: none">1. How am I going to be able to get across Via Alta to enjoy the new recreation center and park with all the cars coming through if the connector is approved?2. Please tell me how I will be able to pull into or out of Frame & Focus with all the vehicles coming through if the connector is approved? Will you put a stop sign at the intersection so I can turn in and out of my community?3. The road of Via Alta is only one lane each way. What happens if there is a car breakdown or accident that blocks the road? |
| CX-3 | <ol style="list-style-type: none">4. I back up to the north end. What will you do to abate all the noise that will happen if all these vehicles are coming through if the connector if allowed? I thought I would have a peaceful retirement this is not what I imagined, if the road connector is allowed. |
| CX-4 | <ol style="list-style-type: none">5. If the connector is allowed what will the city to do to help decrease the speed going down the hill? |
| CX-5 | <ol style="list-style-type: none">6. Residential units bedrooms and balconies are just feet from Via Alta, what will you do for these people that sleep 10-15 feet from the road? |
| CX-6 | <ol style="list-style-type: none">7. As a School Nurse, I am deeply concerned that you would a major road connector where a future school in going to be placed. What are you going to do for the safety of these future children? |

CX-7

8. What will do to protect my community from all the pollution that will occur if the road connector is allowed?

CX-8

9. What will you do to prevent the crime that will indeed follow if the road connector is allowed?

Because of the numerous and significant flaws in the PEIR, I AM STRONGLY OPPOSED to the approval of this Connector Road.

There are additional reasons why I oppose the Connector Road:

CX-9

- ☐ The Civita community was intended to be a self-contained, pedestrian friendly, family-oriented, smart-growth, new residential community and that is why we purchased here at Lucent. The connector road will destroy our community.
- ☐ Via Alta, which is a proposed main route to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road (with bike paths on both sides, further narrowing the road) which will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic.
- ☐ The PEIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley and Civita to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities. **Why would the PEIR argue that diverting traffic from a largely commercial Mission Center Road that contains only one set-back residential complex and generally follow a non-populated canyon at its northern-most end to and through wholly residential streets which currently have a park, a planned school, and eight residential complexes (Frame & Focus, Lucent, Altana, Origen, Versa, Circa 37, West Park, and Aquatera, with a ninth being planned), all, of which, closely abut against the street with very little or no setback?**
- ☐ Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption. It will no longer be a walkable community.
- ☐ **Why hasn't the PEIR proposed better solutions?** The so-called connector road was initially placed into a 30-year-old plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what?.....perhaps cutting one or two minutes from someone's commute (and even that is debatable).

CX-9
cont.

- With the Connector Road, CIVITA will become nothing more than a splintered, GPS-shortcut/pass-through community.
- VIA ALTA (and eventually Franklin Ridge Road) will become dangerous, congested , polluted, noisy throughfares.

WE CIVITA OWNERS WANT TO PROTECT THE CHARACTER OF OUR
COMMUNITY AND DEVELOPMENT.

DO NOT APPROVE THE CONNECTOR ROAD, AS CURRENTLY PROPOSED!

Sincerely,

Pam Fleming
Address- 2609 Aperture Circle, San Diego Ca 92108

Letter CX: Pam Fleming

CX-1: The commenter provides a personal history and reasons for purchasing a home in Civita. The commenter expresses general concerns regarding walkability and community character/division.

This comment raises general concerns related to traffic, walkability, and community character, but does not specifically raise issue regarding the adequacy of the DEIR. Please see the responses to comments F-4 and R-1 for responses to these issues. In addition, landscaping that conforms to the City's Landscape Regulations would be included in the project design to enhance the aesthetic character of the street design. No changes to the FEIR are required as a result of this comment.

CX-2: The commenter questions how Via Alta will be crossed to the new recreation center and park, if a stop sign will be added at the intersection to the Frame & Focus community, and what happens if a car blocks Via Alta.

This comment is similar to comments F-4 and F-5. Please see the responses to those comments.

CX-3: The commenter questions what noise abatement measures will take place after the proposed roadway connection is constructed.

This comment raises concerns related to noise as a result of the proposed project. The environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in Section 5.8, Noise, of the DEIR. As detailed in Section 5.8, the proposed project would result in less than significant operational noise impacts; therefore, no mitigation or noise abatement measures are required for operational noise. In addition, the proposed project would result in less than significant construction-related noise impacts with the implementation of mitigation. No changes to the FEIR are required as a result of this comment.

CX-4: The commenter questions what the city will do to decrease speed going down the hill.

This comment is similar to comment CQ-9; please see the response to that comment. In addition, please also see response to comment W-1 regarding potential traffic calming measures. No changes to the FEIR are required as a result of this comment.

CX-5: The commenter states that residential unit bedroom and balconies are just feet from Via Alta, and asks what will be done for these people that sleep 10-15 feet from the road.

The commenter appears to be questioning potential noise impacts on residential units located adjacent to Via Alta. Please see the response to comment CX-3. As detailed in Section 5.8 of the DEIR, the proposed project would result in less than significant operational noise impacts, and less than significant construction-related noise impacts with the implementation of mitigation. No changes to the FEIR are required as a result of this comment.

CX-6: The commenter questions the potential future school in Civita as it relates to safety of children.

This comment is similar to comment F-4; please see the response to that comment.

CX-7: The commenter questions what will be done to protect the community from pollution that will occur from the proposed roadway connector.

Please see the response to comment F-2. This comment raises concerns related to pollution, but does not specifically raise issue regarding the adequacy of the DEIR. Moreover, this environmental concern raised by the commenter is analyzed, and the impacts are disclosed, in Sections 5.3, *Air Quality*, 5.4, *Noise*, and 5.8, *Hydrology and Water Quality* of the DEIR in. As detailed in Section 5.8 of the DEIR, the proposed project would result in less than significant operational noise impacts, and less than significant construction-related noise impacts with the implementation of mitigation. In addition, impacts related to air quality and hydrology/water quality were determined to be less than significant in the DEIR.

CX-8: The commenter questions what will be done to prevent crime that will follow as a result of the proposed roadway connector.

This comment is similar to comment O-1. Please see the response to that comment.

CX-9: The commenter expresses opposition to the proposed roadway connection and generally repeats comments provided in Save Civita, which is included as Letter F. Please see response to comment F-2 through F-11.

The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: Tichenor <jftichenor@gmail.com>
Sent: Tuesday, May 30, 2017 1:33 PM
To: PLN_PlanningCEQA
Subject: Roadway Connection Project No. 265605 SCH No. 2012011048

Attention:

Ms. Susan Morrison
 Environmental Planner
 City of San Diego Planning Department
 1010 2nd Avenue, MS 413
 San Diego, CA 92101

Sent via email: planningCEQA@sanidiego.gov

Re: Serra Mesa Community Plan Amendment Roadway Connection Project

Project No. 265605

Below are some of my, John Tichenor- home owner 92108, questions regarding the DEIR for the Murray Ridge connector road

1. Please explain and address why more alternative connector roadway options were not explored in the DEIR?
 1. More specifically, what limitations prevented the DEIR contributors from looking at more alternative connector roadway options, was there a lack of budget for the DEIR report to investigate alternative options?
 2. Was the City or State unwilling to fund other variations of the project due to lack of budget?
 3. Was the DEIR team unable to find the appropriate engineering resources or have lack of time or money to properly address the problem statements and goals of the DEIR?
 4. Would this Murray Ridge project even be in discussion or have any merit if there was currently a means for vehicles to travel directly from the 805 to Friars?
 5. Are members of the DEIR contributors being forced to explore the Murray Ridge connector solution because of the financial contributions promised by the Civita development project or other related pressures?
2. The study included in the DEIR for noise does not provide a complete view of how the data was collected, please show how the noise study addressed the worst case scenario: specifically there are many homes along Via Alta that have hard surfaces, due to sound reflective architectural features such as tiles and metals, that can concentrate road noise artifacts and can have a peak noise values greater than would be expected. Did the noise study place sensors in the appropriate locations to address these specific architectural features?
 1. Including the patio's of residences along the Via Alta roadway and similar locations which are likely susceptible to the acoustical concentration based on the architectures?
 2. Was a thorough noise study done to determine unique impacts to the residences along Via Alta that details the specific architectural features?
 3. Did the noise study be conducted during worst case times, such as times when heavy machinery was under operations, or such as times when landscaping equipment was in use and in coordination with the prior related noise study questions?
3. There is little to no mention of the impact of an 805 connector to Friars road and how that lack of feature set and access is impacting the nature of this DEIR for the Murray Ridge Road connector. More specifically, why is the City effectively, via this connector road proposal, encouraging city traffic drivers that would potentially try to gain access to Friars road (there's currently no 805 and Friars connector) that will potentially travel through Via Alta and/or Franklin Ridge Road?
 1. More specifically, why doesn't this DEIR investigate a frontage road that connects the Murray Ridge 805 ramps down to Friars, including benefits and impacts? If a frontage road that connects Friars to 805 is not possible, then why and how?
 2. Wouldn't a frontage road alternative connecting Murray Ridge to Friars achieve most or all of the goals of the study? If a frontage road that connects Friars to 805 can or cannot meet the goals of the DEIR, then why and how is this not a viable option?
 3. Wouldn't a frontage road alternative connecting Murray Ridge to Friars eliminate many of the significant findings in the current DEIR? If a frontage road that connects Friars to 805 is larger or smaller impact, then how and why?

CY-4
cont.

4. Just because the goals of the DEIR are met does not ensure success of the project, the home owners in Serra Mesa currently are significantly impacted by 805 traffic funneling off the 805 in their neighborhood(s), even though the DEIR shows the goals of the project being met, why aren't the goals of the DEIR more detailed in showing the types of issues and problems that are trying to be solved?

Sincerely,
John Tichenor

Letter CY: John Tichenor

CY-1: The commenter provides an introductory statement regarding submittal of comments for the project.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments CY-2 through CY-4 below.

CY-2: The commenter questions why more alternative connector roadway options were not explored in the DEIR, referring to specific limitations such as budget and lack of engineering resources, whether the project would be considered if there were currently other means for traveling directly from I-805 to Friars Road, and if financial contributions promised by the Civita development were a factor.

Alternative options for providing freeway access were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

No changes to the FEIR are required as a result of this comment. The comment does not raise issue regarding the adequacy of the DEIR.

CY-3: The commenter has several questions regarding the noise study included in the DEIR with respect to how the data was collected, how worst case scenario times were addressed, and the placement of sensors along Via Alta residences with specific architectural features.

At the time of the noise measurements, Via Alta was under construction and not yet fully open. As described in Section 5.4, *Noise*, of the DEIR, the noise measurement results are included for reference but are not intended to directly represent worst-case traffic noise conditions and are not used to assess potential noise impacts. Noise measurements were obtained at accessible areas adjacent to streets within the study area; this methodology is consistent with industry standard practice. Field Data Reports providing additional details about the field noise measurements are included as Appendix E (Noise Assessment) to the DEIR. Noise conditions were assessed based on the 24-hour noise metric Community Noise Equivalent Level (CNEL), as required by the City's CEQA Significance Determination Thresholds, using predicted traffic volumes provided in the Traffic Impact Study. Potential impacts were assessed, as explained in Section 5.4, based on traffic noise modeling for both near-term and long-term (future) scenarios, both with and without the project.

Noise levels were not modeled for individual receptors such as specific balconies. This level of detail is beyond the generally accepted standards for CEQA-level noise analyses which are required to consider a large and varied study area. It is worth noting that, in addition to the potential noise

increases experienced due to noise reflections, patios often experience benefits such as noise decreases due to acoustical shielding of the surrounding structure.

The Noise Assessment determined traffic noise levels at representative receiver locations throughout the study area, as well as the relative noise increases (or decreases) due to the proposed project, pursuant to CEQA requirements and consistent with industry-standard practices. Detailed analysis of individual building architecture was not conducted and is beyond the scope of the generally accepted standards for CEQA-level noise analyses.

Noise modeling was used to predict the traffic noise levels that will occur under the various scenarios considered in the EIR. Because the proposed project is a roadway, the only operational noise source related to the project is traffic. Other noise sources such as heavy machinery or landscaping equipment are not related to project operations and are not included in the analysis of operational impacts. Noise from heavy machinery used during project construction is addressed separately in Section 5.4.4 of the DEIR. No changes to the FEIR are warranted as a result of this comment.

CY-4: The commenter states that there is no mention of the impact of an 805 connector to Friars Road and has several questions regarding the benefits and impacts of a frontage road alternative connecting Murray Ridge Road to Friars Road. The commenter questions the level of detail in “the goals of the DEIR showing the types of issues and problems that are trying to be solved.”

While alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas is one of the project objectives, it is not the only objective of the proposed project. Please see the response to comment CY-2 for a description of the objectives of the proposed project.

Regarding the commenter’s opinion that the goals of the DEIR are not detailed in showing the types of issues and problems that are trying to be solved, the City disagrees with these contentions. The proposed project results from the City Council initiating an amendment to the Serra Mesa Community Plan on October 21, 2008 (Initiative R-304297), and directing the Planning Department to address the issues and impacts related to construction and operation associated with the proposed roadway connection to Phyllis Place.

The City Council directed staff to analyze issues in relation to the street connection and land use plan amendments, including whether police and fire response times would be improved with the road connection, whether the road connection could serve as an emergency evacuation route, whether it is feasible to make the road available for emergency access only, and whether pedestrian and bicycle access would be improved by the street connection. A frontage road alternative connecting Murray Ridge Road to Friars Road was not investigated as an alternative I-805 connector because it would not meet City Council direction with regards to an emergency access/evacuation route, as traffic (including emergency vehicles) would still travel a circuitous, out-of-direction path entering and exiting land use developments between Friars Road and Phyllis Place/Murray Ridge Road/I-805, nor would it meet a majority of the project objectives identified in the DEIR. A frontage road would not create an additional access point to these developments. In addition, a frontage road is not in the current community plans for either Serra Mesa or Mission Valley, nor was a frontage road discussed in the EIR scoping meeting.

The proposed project meets the intent of the City Council resolution and project objectives, and corrects the policy conflict between the Mission Valley and Serra Mesa community plans. All of the

environmental concerns raised by the resolution are analyzed, and the impacts of the proposed project are disclosed, in the DEIR. Therefore, no changes to the FEIR are required as a result of this comment.

From: Susan Shean <susan.shean14@gmail.com>
Sent: Tuesday, May 30, 2017 11:44 PM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605
Attachments: DEIRResponse53017 (1).pdf

CZ-1 | Please see attachment for DEIR related comments.
Thank you,
Susan Shean

8724 Raejean Av
San Diego, CA 92123
May 28, 2017

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego, CA 92101

Project Name: Serra Mesa Community Plan Amendment Roadway Connection Project
Project No. 265605;

SCH No. 2012011048

Regarding **Transportation and Circulation(6.3.2) and Significant Project Traffic Impacts (Table 6.2):**

Has a Long-Term VMT projection for a 4000 residence and sports stadium complex at the Qualcomm site been considered in the with and without project scenarios? Please comment on its potential impact on traffic circulation at Mission Center Road and the overall Project Influence Area, with and without Project.

Regarding: **Table 5.2-16 Roadway Segments: Long Term Baseline Cumulative Condition vs Long-Term Cumulative Condition with Project**

This table indicates that the 2035 LOS on Mission Center Road between Aquaterra Driveway and Murray Ridge Road could be 23,850 without the project and 13,064 ADTs with the project. There is no reference to widening of Mission Center Rd, as had been discussed as traffic mitigation in the previous PEIR. Recognizing that there are 80 Heritage, Canary Island Pine trees lining the canyon road, the result of an assessment to the original 1950 era homeowners, the trees would be preserved.

Please comment on whether widening of Mission Center Road is still a consideration and if so, how this could proceed without endangering 80 Heritage trees.

Thank you in advance for replies to these questions.

Very truly yours,

E. Susan Shean
susan.shean14@gmail.com

Letter CZ: Susan Shean

CZ-1: The commenter provides an introductory statement regarding submittal of comments for the project.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments CZ-2 through CZ-4 below.

CZ-2: The commenter references Section 6.3.2, Transportation and Circulation (Cumulative Impacts), and Table 6.2, City of San Diego Measure of Significant Project Traffic Impacts, of the DEIR and questions if a long-term VMT projection has been considered for the 4,000 proposed residences and sports stadium complex at the Qualcomm site. The commenter requests comment on potential impacts of the proposed Qualcomm site project to Mission Center Road and the project area, with and without the Project.

Reasonably foreseeable future projects are defined as those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome. As of the date that the Notice of Preparation was circulated (January 23, 2012), no development application had been submitted to the City for the proposed residences and sports stadium complex at the Qualcomm site. Please see Section 6.2, List of Cumulative Projects, and Figure 6-1, Cumulative Projects Location, of the DEIR for cumulative projects from which traffic generated was considered in the analysis for cumulative transportation and circulation impacts. This analysis includes all intersections and roadway segments to which the project would contribute 50 or more peak-hour trips in the Near-Term (Year 2017) and Long-Term (Year 2035) scenarios.

In addition, please see response to comment G-67 as to why special event traffic data was not collected or analyzed for the proposed project.

CZ-3: The commenter references Table 5.2-16 of the DEIR and cites the 2035 projected ADT on Mission Center Road between Aquatera Driveway and Murray Ridge Road with and without the project. The commenter also references prior mitigation in the April 2016 Draft PEIR that included the widening of Mission Center Road and questions if this is still a consideration for the Project.

This comment repeats information provided in Table 5.2-16 of the DEIR, but does not raise issue regarding the adequacy of the environmental analysis contained in the DEIR. All mitigation measures required to reduce significant impacts are identified in the DEIR. As indicated in Section 5.2, *Transportation and Circulation*, the widening of Mission Center Road between Aquatera Driveway and Murray Ridge Road is not identified as a mitigation measure, as the proposed project would not result in any significant impacts along this roadway segment. Accordingly, it was not included in the recirculated DEIR for the proposed project.

From: Lesley Marples <lmarples@san.rr.com>
Sent: Tuesday, May 30, 2017 1:43 PM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project Response
Attachments: OpposeConnection.doc

DA-1

Dear Ms. Morrison:

Attached is my response to the above Titled Subject matter, sent to you before close of business on May 30, 2017.

Sincerely,

Lesley A. Marples
Home Owner

Attachment: 2 pages

Lesley A. Marples
8339 Abbotshill Road
San Diego, CA 92123-3804
C: 619-756-2506

May 29, 2017

Planner Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 2nd Avenue, MS 413
San Diego CA 92101

Re: Project Name: Serra Mesa Community Plan Amendment Roadway
Connection Project
Project Number: 265605

Dear Ms. Morrison:

In response to the Recirculated Draft EIR for the Serra Mesa Community Plan Amendment Roadway Connection Project, I adamantly oppose the road connection.

I am totally frightened by the main fact that any road the size of this proposed connection may, and most likely will, cut off ingress and egress to my home which is located to the west of the proposed connection, when I need to do so.

When it was built, Freeway 805 cut all access to over 200 homes in this area, rendering this area a cul-du-sac. Phyllis Place is the only way in and out for my daily needs. Should I not be able to get in or out during a sudden need to do so, there is a distinct possibility of my dying or one of my family members or a friend before we can go for help, because of the huge congestion that is apparent by the number of automobiles that are planned to use the connection hourly and daily.

Since I have lived here, there have been installed three traffic lights on Phyllis Place/Murray Ridge Road that I must get through to get in or out where there were none before. Now, an additional traffic light is planned for what looks like one huge interchange on Phyllis Place. This interchange is an enormous barrier through which I must fight each day; this interchange will degrade the environment in which we currently live with air and noise pollution and trash; this interchange will cause enormous problems for this cul-du-sac community trying to get to work timely and returning home; and, this interchange, over time, will degrade our property values.

According to the Specific Plan by which Civita/Quarry Falls received its permit to build, they were to build without connecting to any roads around them – an all-inclusive walkable community. Who has given them the right to violate their original

DA-2

DA-3

DA-3 | permit by allowing them to build this connection? Will you please respond to this
cont. | question or tell me why you cannot.

DA-4 | I stand with my community and oppose the building of this connection. I look forward
to your response to my question above.

Sincerely yours,

Lesley A. Marples
Home Owner

Letter DA: Lesley A. Marples

DA-1: The commenter provides introductory statements regarding submittal of comments for the project.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments DA-2 through DA-4 below.

DA-2: The commenter expresses opposition to the proposed roadway connection and general concerns regarding increased traffic congestion and emergency evacuation, air and noise pollution, trash, and degraded property values as a result of the proposed roadway connection.

Please see the response to comment F-2. This comment raises general concerns related to air pollution, noise, trash, traffic congestion, evacuation safety risks, and decreased property values, but does not specifically raise issue with the adequacy of the DEIR. Moreover, the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, 5.8, and Hydrology and Water Quality, of the DEIR. Based on the impact analysis contained in the DEIR, the proposed project would result in significant and unavoidable impacts after mitigation related to transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards). With the implementation of mitigation measures, the proposed project would result in less than significant impacts related to noise. All other potential impacts were determined to be less than significant, including those related to air quality. Moreover, emergency response times would improve with the project compared to conditions without the project.

The commenter's concern regarding increased trash is a broad statement that is not supported by substantial evidence. In addition, the commenter's concerns regarding decreased property value is not an issue under the domain of CEQA unless it is attributed to a specific physical impact on the environment. The comment raises an economic issue unrelated to the environmental analysis provided within the DEIR. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

DA-3: The commenter expresses the opinion that, according to the Specific Plan for which Civita/Quarry Falls received its permit, the development was to occur without connecting to any adjacent roads. The commenter questions why Civita/Quarry Falls is violating the original permit by allowing the connection to be built.

The commenter is incorrect in suggesting that Civita/Quarry Falls is "violating" their original permit. As discussed in Chapter 3.0, Project Description, of the DEIR, several alternatives within the Quarry Falls PEIR analyzed a potential road connection from the Quarry Falls development north of Phyllis Place. Specifically, Alternative 4 (Road Connection to Phyllis Place) analyzed the potential environmental impacts of the road connection itself. On October 21, 2008, the City Council held a public hearing and approved the Quarry Falls Project. As part of the actions by which it approved the Quarry Falls Project, the City Council initiated an amendment (Staff Recommendation Number 6) that directed City staff to analyze an amendment to the Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Transportation Element. Consequently, evaluation of the proposed roadway connection is in

response to direction by the City Council. Please note that the City Council has not approved the project at this time and will consider whether or not the specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant environmental effects.

DA-4: The commenter concludes the letter by expressing their opposition to the proposed roadway connection. This comment is a conclusory statement expressing opposition to the proposed project and does not raise any specific environmental issues pursuant to CEQA.

From: Rajeev Tillu <r_tillu@yahoo.com>
Sent: Tuesday, May 30, 2017 9:14 PM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project

Dear Sir or Madam,

I, Rajeev Tillu and my wife, Padmini Tillu reviewed the Draft EIR submitted are totally against the proposed Franklin Ridge/Phyllis Place Freeway Connector, and we do not support the construction of that connector.

In our opinion, irrespective of theoretical studies performed based on the data collected, the proposed project is a planning mistake, for the following reasons:

- Via Alta road is not planned for 2 lane road (in each direction) to handle the amount of traffic that will increase. And, the amount of traffic that will be increased on the Via Alta road will create hazardous conditions for residents to cross the road to get the new park from north side of Via Alta.
- Additionally it will be extremely dangerous for the children in the school that has been planned at the intersection of Via Alta and Civita Blvd. If the connector is approved, you should rezone the plot for the school to something else.
- Mission center road is sufficient as the main connector to the highway, and that should remain as the main access to the highway I-805 and Highway 163, which works for me every day.
- As we have travelled and worked in many other countries where public transportation is far superior than us in US, using their models, shuttles to train station needs to be started first instead of this particular highway connector. I was told by Shea that shuttle to train stations have been planned.
- Lastly, this particular connector will totally mess up a well-developed Civita community.

Therefore, this proposed Franklin Ridge/Phyllis Place Freeway Connector is a huge planning mistake and we do not support the construction of that connector at all.

Thank you,

Rajeev and Padmini Tillu

Residents of Civita community (Mission Valley)

DB-1

Letter DB: Rajeev and Padmini Tillu

DB-1: The commenters express opposition to the proposed roadway connection, stating that Via Alta Road cannot handle additional traffic, concerns with safety hazards with the school, that Mission Center Road should be the main freeway connector, the need for shuttles to the nearby train stations, and that the roadway connection is a mistake.

Please see the response to comment F-2. This comment raises general concerns related to traffic, pedestrian safety in relation to the potential school, and a lack of public transit, but does not specifically raise issues regarding the adequacy of the DEIR. Alternative options to the proposed roadway connection for providing a connection between the Serra Mesa and Mission Valley communities were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

Please also see the responses to comments F-4 and F-5 regarding pedestrian safety. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: Adam Gardner <adam.m.gardner@icloud.com>
Sent: Tuesday, May 30, 2017 11:09 PM
To: PLN_PlanningCEQA
Subject: Serra Mesa Community Plan Amendment Roadway Connection Project
Attachments: Serra Mesa Community Plan Amendment Roadway Connection Project (# 265605)_Adam Gardner.pdf

Dear Susan,

Please see attached for PDF of my letter regarding the "Serra Mesa Community Plan Amendment Roadway Connection Project."

DC-1

PROJECT NAME: Serra Mesa Community Plan Amendment Roadway Connection Project
PROJECT No. 265605 / SCH No. 2012011048
COMMUNITY AREA: Serra Mesa and Mission Valley
COUNCIL DISTRICT: 7 (Sherman)

Thank you for your time,
Adam Gardner.

Dear Reader(s),

This letter is in relation to the draft EIR for the following project:

PROJECT NAME: Serra Mesa Community Plan Amendment Roadway Connection Project

PROJECT No. 265605 / **SCH No.** 2012011048

COMMUNITY AREA: Serra Mesa and Mission Valley

COUNCIL DISTRICT: 7 (Sherman)

DC-2 | *Upon review of the draft EIR I have developed numerous concerns by the way the project objectives are structured. The following section and subsequent questions are addressing those concerns:*

DC-3 | **In regards to project objective one:** Objective one under the project objectives is potentially an improper CEQA objective as it is too narrow and limits resolving the inconsistency to the incredibly specific “*providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.*” This unreasonably limits alternative analyses and lead to inadequate treatment of reasonable alternatives. Please reference CEQA Guidelines Section 151249(b). Will objective one’s wording be changed in the final EIR in order to reflect a legitimate objective. If not please provide a reason for not correcting the objective. If the objective is changed will the alternatives section also be updated to include the study of any new reasonable alternatives reflecting the change? If not please provide a reason for not updating the alternatives section to reflect the change in objective one.

DC-4 | **In regards to objective three:** Traffic congestion and navigational efficiency are two mutually exclusive categories that may be in conflict with each other. Improving navigational efficiency may not alleviate traffic congestion. Alleviating traffic congestion may not improve navigational efficiency. Will this objective be separated into two separate objectives one based on traffic congestion and the other based on navigational efficiency for the final EIR? If this objective will not be separated into one objective based on safety and one objective based on efficiency please provide a reason for not separating. If this objective is updated will the changes be reflected in the alternatives studied? If this objective is updated will the changes be reflected in the conclusions section?

DC-5 | **In regards to objective five:** Safety and efficiency are two mutually exclusive categories that may be in conflict with each other. What is safe may not be efficient and what is efficient may not be safe. Will this objective be separated into two separate objectives one based on safety and the other based on efficiency for the final EIR? If this objective will not be separated into one objective based on safety and one objective based on efficiency please provide a reason for not separating. If this objective is updated will the changes be reflected in the alternatives studied? If this objective is updated will the changes be reflected in the conclusions section?

DC-6 | **In regards to project objective five:** Objective one under the project objectives is potentially an improper CEQA objective as it is too narrow and limits resolving the inconsistency to the incredibly specific “*safe and efficient street design.*” This unreasonably limits alternative analyses to streets and leads to a biased and inadequate treatment of reasonable alternatives especially if they only include pedestrian, bicycle, and emergency access. Please reference CEQA Guidelines Section 151249(b). Will objective five’s wording be changed in the final EIR in order to reflect a legitimate objective. If not please provide a reason for not

DC-6 cont.	correcting the objective. If the objective is changed will the alternatives section also be updated to include the study of any new reasonable alternatives reflecting the change? If not please provide a reason for not updating the alternatives section to reflect the change in objective one.
DC-7	<i>Upon review of the draft EIR I have developed numerous concerns about the efficacy of the study due to information either omitted and or overlooked by the document. The following section and subsequent questions are addressing those concerns in relation to the project objectives they fall under:</i>
DC-8	In regards to project objective one and two: Given that there is existing emergency and pedestrian access at Kaplan Drive that was not mentioned in the draft EIR. There is a planned bicycle and pedestrian trail thru the Phyllis Place park regardless of the proposed Franklin Ridge Road connection. There is bicycle and motorist access between the two communities on Mission Center Road to the west. Finally there is bicycle, pedestrian, and motorist access between the two communities on Mission Village Drive to the east. There is already constitutes as existing multi-modal linkage that arguably yields adequate local mobility for both communities. With the project there are significant and unavoidable effects that will negatively affect congestion and traffic circulation (section 8.1.1). How then can the draft EIR conclude in table 9-2 that the impacts are greater that the proposed project for the alternatives in the “transportation and circulation” environmental resource?
DC-9	In regards to project objective five: Were the increased vehicle emissions and air pollutants associated with vehicles waiting in delays at the 805 northbound of 43 minutes (PM) and southbound of 31 minutes (PM)) on ramps (Appendix C: Page 61) included in the air impacts of the project alternative? If not please provide a reason for its exclusion.
DC-10	In regards to objective five: VMT does not consider the environmental effects of traffic congestion or the time delay of an average trip. Why was VMT chosen as a method of study for the draft EIR? Why is the shortest distance traveled considered and environmentally superior option when there are many other variables like delay that have an environmental effect? Will the conclusion drawn about the project and alternatives also reflect considerations like delay in addition or in the place of VMT? If not please provide a reason for their exclusion.
DC-11	In regards to project objective four and five: There is existing Pedestrian and Emergency access at the Kaplan Dr and Aperture Circle with a bollard/gate (See attached Figure 1, Picture 1, and Picture 2). Why was this existing access not included in the study? Will it be included in the final EIR and if not please provide a reason for its exclusion.
DC-12	In regards to project objective five: In section 7.9 the analysis concludes that the impacts to recreation are less than significant. However the bifurcation of the park by the Franklin Ridge Road connection reduces the unobstructed recreational area of the park by half. Park goers would have to cross a 4 lane road in order to enjoy the entirety of this bifurcated park. Were the effects on recreation and safety from bifurcation with the project vs. non-bifurcation in alternatives 1 and 2 studied? If this was not studied please provide a reason for its exclusion.
DC-13	In regards to project objective two, three, four, and five: The community to the west of Phyllis Place past the proposed Franklin Ridge Road connection has approximately 200 homes and only one

DC-13
cont.

method of egress and ingress through Phyllis Place and over the 805 bridge (See attached Figure 2). The traffic traveling to and from the 805 on and off ramps from the proposed Franklin Ridge Road could potentially block this singular access point and restrict access to these homes. This restriction could potentially negatively impact to local mobility for residents of these homes. It could negatively impact safe and efficient street design for motorists, cyclists, and pedestrians in this area. It could also negatively impact the ability of emergency access and evacuation routes specifically for these 200 homes. Will the final EIR take into consideration and study these potential impacts for these homes and if not can you provide a reason for their exclusion? Also if there will be a significant impact on this community are there additional possible mitigations that will be considered and or studied?

Thank you for your time and consideration,

A handwritten signature in black ink, reading "Adam Gardner". The signature is written in a cursive style with a large, stylized "A" and "G".

Adam Gardner.

Figure 1. Google map imagery of existing emergency and pedestrian access not studied by the draft EIR.



DC-14

Figure 2. Google map imagery of the isolated community to the west of Phyllis Place.



DC-15

Picture 1. *Existing emergency access between Mission Valley and Serra Mesa not studied by the EIR.*



DC-16

Picture 2. *Existing pedestrian access between Mission Valley and Serra Mesa not studied by the EIR.*



DC-17

Letter DC: Adam Gardner

DC-1: The commenter provides project information and an introductory statement regarding submittal of comments for the project.

This comment is an introductory statement and does not raise any specific environmental issues pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments DC-2 through DC-14 below.

DC-2: The commenter states numerous concerns with the way the project objectives are structured and addresses them in subsequent comments. This comment does not raise issue regarding the adequacy of the DEIR.

DC-3: The commenter states that project Objective #1 is an improper CEQA objective as it is too narrow and unreasonably limits alternative analyses. The commenter references CEQA Guidelines Section 151249(b) and asks if Objective #1's wording will be changed and, if so, will the alternatives section be updated to include new alternatives reflecting the change.

In 2008, as a result of the approval of the Quarry Falls project in Mission Valley, City Council initiated a plan amendment (City Council R-304297) directing staff to amend the 1977 Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road which is identified in the 1985 Mission Valley Community Plan.

Project objective one of the DEIR is to "resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa." CEQA requires that an EIR contain a "statement of the objectives sought by the proposed project." Under CEQA, "[a] clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations. The statement of objectives should include the underlying fundamental purpose of the project" (State CEQA Guidelines Section 15124[b]).

However, as acknowledged in *Save Our Heritage Organisation v. County of San Diego*, (2014) neither CEQA nor the CEQA Guidelines impose limits on the project objectives in an EIR and courts do not have the authority to impose a limitation such as prohibiting a certain project objective in an EIR.

The proposed project meets the intent of the City Council resolution, and project objective one would correct the policy conflict between the Mission Valley and Serra Mesa community plans. Furthermore, the comment references Section 151249(b) of the State CEQA Guidelines, which does not exist. Therefore, it is unclear what the commenter is specifically referring to in the State CEQA Guidelines. No changes to the FEIR are required as a result of this comment.

DC-4: The commenter expresses the opinion that traffic congestion and navigational efficiency included as project objective three are two mutually exclusive categories that should be split into two separate objectives.

The commenter notes that the project objective has two primary goals: reduce traffic congestion overall and improve navigational efficiency. Project objective three of the DEIR is to "alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the

surrounding areas.” Although the commenter has a different opinion, traffic congestion and navigational efficiency need not be treated as independent objectives. The project would reduce traffic congestion in the adjacent areas by providing drivers additional ways to access the local freeway ramps. This would alleviate congestion at ramps that would be heavily used in the future to ramps that would be underutilized in comparison. In addition, navigational efficiency is achieved by reducing the miles that need to be driven to reach freeway on ramps. Please see Section 5.2, *Transportation and Circulation*, for a discussion of the reduction of vehicle miles traveled with the project and the traffic congestion reduction at some roadways and intersections as a result of the redistribution of trips in the area as an additional roadway connection is available. No changes to the FEIR are required as a result of this comment.

DC-5: The commenter expresses the opinion that safety and efficiency included as project objective five are two mutually exclusive categories that should be split into two separate objectives.

Project objective five of the DEIR is to “provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.” Safety and efficiency are not necessarily in conflict and need not be treated as independent objectives. Specifically, the roadway would be safe by being designed in accordance with the City of San Diego’s Street Design Manual. Please see the response to comment F-4 for a more detailed response on safety. Moreover, the roadway would be efficient because it would be a direct connection between the Serra Mesa and Mission Valley communities and, at only 460 feet long, would provide a relatively short path to additional amenities in both communities, as well as regional access via the I-805. Thus, safe and efficient road design need not be considered as mutually exclusive objectives. No changes to the FEIR are required as a result of this comment.

DC-6: The commenter expresses the opinion that project Objective #5 is an improper CEQA objective as it is too narrow and unreasonably limits alternative analyses. The commenter references CEQA Guidelines Section 151249(b) and asks if Objective #5’s wording will be changed and, if so, will the alternatives section be updated to include new alternatives reflecting the change.

Project Objective #5 of the DEIR is to “provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.” Please see the response to comment DC-3, which provides support for the City developing CEQA objectives to ensure the basic needs of a proposed project are achieved. A central objective of the project is to provide a safe and efficient street while minimizing environmental impacts. No changes to the FEIR are required as a result of this comment.

DC-7: The commenter states numerous concerns about the efficacy of the DEIR due to alleged omissions or overlooked information. The commenter indicates that specific questions regarding these concerns are to follow.

This comment does not specifically identify which alleged omissions or overlooked information the commenter is referring to, but indicates they follow this comment. No specific environmental issues are raised.

DC-8: The commenter has concerns about project Objectives #1 and #2, citing existing emergency access at Kaplan Drive and existing adequate multi-modal linkages between the two communities. The commenter asks how Table 9-2 concludes that the transportation and circulation impacts of the project alternatives are greater than the proposed project.

Project Objective #1 of the DEIR is to “resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa,” and project Objective #2 of the DEIR is to “improve local mobility in the Serra Mesa and Mission Valley planning areas.”

The proposed roadway connection would add an additional access point, inherently providing better emergency evacuation routing, and it would be sited closer to regional access for quicker response. The road connection would provide a third point of evacuation for residents in Civita where two currently exist, and a second point of evacuation for the 200 or so homes at the western end of Phyllis Place in the Abbotshill neighborhood where only one currently exists. Please see the response to comment G-18 regarding the existing emergency access along Kaplan Drive. Kaplan Drive is a short neighborhood street providing access to the homes from Ainsley Road; however, the portion of Kaplan Drive that connects to Aperture Circle has bollards installed to prevent general traffic from traveling between Mission Valley and Serra Mesa. As such, there is not a complete multi-modal linkage between the Mission Valley and Serra Mesa communities, as only pedestrian and bicycle linkages exist via Kaplan Drive. While multi-modal linkages may currently exist in the project area on Mission Center Road and Mission Village Drive, the proposed roadway connection would provide Civita and other area residents with another direct multi-modal route between the communities of Serra Mesa and Mission Valley. The proposed Phyllis Place Park will provide a primary walkway; however, this path is designed for passive activities within the park itself and does not serve as a multi-modal linkage to the area pedestrian and bicycle route network.

In regards to the determinations provided in Table 9-2 of the DEIR, the justification for such conclusions is detailed in the analysis of transportation and circulation impacts for Alternatives 1 and 2 in Chapter 9, Alternatives, of the DEIR. As detailed in Chapter 9, it is unlikely that either the No Project Alternative (Alternative 1) or the Bicycle, Pedestrian, and Emergency Access Only Alternative (Alternative 2) could reduce roadway segment impacts on Mission Center Road from Aquatera Driveway to Murray Ridge Road; however, the proposed project would result in significant and unavoidable impacts along three roadway segments. In the Long-Term Scenario, both of these alternatives would result in similar significant and unavoidable impacts regarding roadway segments, and similar significant but mitigable impacts to intersections. Please note that although operations at some roadway segments and intersections would worsen with implementation of the proposed project, the redistribution of traffic that would result from the proposed roadway connection would improve conditions at various other roadway facilities within the traffic study area.

As further detailed in Chapter 9, the No Project Alternative (Alternative 1) and the Bicycle, Pedestrian, and Emergency Access Only Alternative (Alternative 2) both would not decrease VMT within the study area or region and thus would result in a significant and unavoidable impact on freeway mainline segments. Consequently, these alternatives would result in slightly greater impacts compared to the proposed project as they would not decrease VMT and impacts would be similarly significant and unavoidable.

DC-9: The commenter has concerns about project Objective #5 and asks if the vehicle emissions and air pollutants associated with vehicles queuing at the future I-805 northbound ramp (delay of 43 minutes during peak hour in 2035) and southbound ramp (delay of 31 minutes in 2035) were included in the air impact analysis.

Please see the response to comment G-130, which describes the air quality impact analysis associated with vehicle emissions. As noted in that response, the air quality analysis modeled air emissions at the worst intersections and freeway ramps in the future conditions.

DC-10: The commenter questions why VMT was chosen as a method of study, why the shortest distance traveled is considered environmentally superior over other variables like delay, and if the conclusions drawn for all three alternatives reflects considerations like delay in addition to or in place of VMT.

Please see the responses to comments G-87 and G-90 for a discussion of how and why VMT analysis was conducted. In addition, VMT is used to calculate air quality and greenhouse gas emissions in the analyses for the proposed project, the No Project Alternative, and the Bicycle, Pedestrian, and Emergency Access Only Alternative. As such, because the proposed project would result in lower VMT than either alternative, the proposed project would reduce GHG and regional air quality emissions commensurately. Moreover, traffic delay was considered for the proposed project and both alternatives. Please see Section 5.2, *Transportation and Circulation*, which summarizes the delay and congestion with and without the project and Chapter 9, Alternatives, which provides a comparative analysis of traffic congestion and delay. No changes to the FEIR are required in response to this comment.

DC-11: The commenter questions, in regards to project Objectives #4 and #5, why the existing pedestrian and emergency access at Kaplan Drive and Aperture Circle was not included in the study.

Please see the response to comment G-18. The FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2). It was known that Kaplan Drive provides emergency access; however, this was inadvertently not mentioned in the DEIR. However, the emergency response analysis in Section 5.2, *Transportation and Circulation*, took into consideration current emergency access available at Kaplan Drive. The addition of this clarifying information does not affect the conclusions reached within the DEIR.

DC-12: The commenter cites the less than significant impact determinations related to recreation as identified in the DEIR. The commenter questions, in regard to project Objective #5, whether the effects on recreation and safety from bifurcation of the proposed Phyllis Place Park with the project versus non-bifurcation under Alternatives 1 and 2 were studied in the DEIR.

Section 15128 of the State CEQA Guidelines requires that an EIR briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed in Chapter 7, *Effects Not Found To Be Significant*, of the DEIR are not considered significant, and the reasons for the conclusion of non-significance are discussed within that chapter. The determinations were based on the City of San Diego's CEQA Significance Determination Thresholds (2016) and Appendix G of the State CEQA Guidelines.

As detailed in Section 7.9 of the DEIR, the linear Phyllis Place Park has two approved General Development Plans—one if the proposed project were not approved and another if it were. Under project implementation, the future linear park would be bifurcated by the proposed roadway connection but would retain the same acreage. The proposed project would slightly increase access to and availability of parks within the immediate vicinity of the roadway connection. However, access to these parks would also be available if the project was not implemented. The parks within the vicinity are generally smaller, neighborhood-serving recreational facilities that are not expected

to attract a significant amount of visitors outside of these neighborhoods, with or without the project. Implementation of the proposed roadway would therefore not significantly deteriorate parks or other recreational facilities.

Phyllis Place Park was also analyzed for land use compatibility in Section 5.1.4.1, Impact Discussion (Land Use), of the DEIR for the proposed project, in Section 9.5.1.1, Land Use, for the No Project Alternative, and in Section 9.5.2.1, Land Use, for the Bicycle, Pedestrian, and Emergency Access Only Alternative. Although the roadway would require a public right-of-way area that would interrupt the park, the park is a linear design that would still remain connected to the overall system using a pedestrian crossing at the intersection. The proposed project would somewhat divide the park by placing a roadway in between the two portions of it; however, this would not represent a significant impact on the environment as the proposed project would not result in hazards to pedestrians/park users. The roadway itself would be designed in accordance with applicable City regulations, including the Street Design Manual (City of San Diego 2002), and the intersection at Phyllis Place would be signalized and would include a signalized pedestrian crossing. Therefore, impacts were determined to be less than significant.

Pursuant to Section 15126.6 of the State CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project that would avoid or substantially lessen any of the significant effects of the project. Because the proposed project would result in less than significant impacts related to recreation, an analysis of the project alternatives' potential effects on recreation was not required. Accordingly, recreation was not an environmental issue that was analyzed in Chapter 9, Alternatives, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

DC-13: The commenter questions, in regards to project Objectives #2, #3, #4, and #5, whether mobility for the residents in the 200 homes west of Phyllis Place would be impacted by traffic traveling to and from I-805 from the proposed roadway connection. The commenter expresses the opinion that traffic traveling to and from I-805 could impact local mobility for the residents of these 200 homes, impact safe and efficient street design for motorists, cyclists, and pedestrians, and impact the ability of emergency access and evacuation routes for these homes.

The environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in Section 5.2, *Transportation and Circulation*, the DEIR. As indicated in the DEIR, significant and unavoidable traffic impacts were identified along segments of Murray Ridge Road (2017 and 2035), Franklin Ridge Road (2035), and Rio San Diego Drive (2035) and at intersections Murray Ridge Road and Sandrock Road (2035), Murray Ridge Road and the I-805 Northbound and Southbound I-805 ramps (2035), and for a design hazard associated with left turns from the existing City View Church parking lot due to its proximity to the proposed project intersection at Phyllis Place and the proposed roadway. In addition, the effects of the proposed project on all transportation facilities, including with the implementation of mitigation measures, are detailed in Tables 5.2-10 through 5.2-22 of the DEIR. As all potential transportation and circulation impacts are disclosed, no changes to the FEIR are required as a result of this comment.

DC-14: The commenter provides two figures and two pictures referenced in comments DC-11 and DC-13. This comment relates to comments DC-11 and DC-13. Please see the responses to those comments. This comment does not address the adequacy of the DEIR.

From: Bryce Niceswanger <bryce_a_roni15@hotmail.com>
Sent: Tuesday, May 30, 2017 2:28 AM
To: PLN_PlanningCEQA; sherrilightner@sandiego.gov; CouncilMember Lorie Zapf; toddgloria@sandiego.gov; Councilmember Myrtle Cole; Councilmember Mark Kersey; CouncilMember Chris Cate; Councilmember Scott Sherman; CouncilMember David Alvarez; martiemerald@sandiego.gov; Mayor Kevin Faulconer; Councilmember Barbara Bry; Councilmember Christopher Ward; CouncilMember David Alvarez; Councilmember Georgette Gomez
Subject: Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048
Attachments: My letter to the Planning Dept DEIR.docx

PlanningCEQA@sandiego.gov

Subject: Serra Mesa Community Plan Amendment Street Connection

Project No. 265605 SCH No. 2012011048

Dear Susan Morrison, San Diego City Council Members and Mayor Kevin Faulconer,

DD-1

The City Council authorized the initiation of a Serra Mesa Community Plan amendment in an October 2008 resolution to include a street connection between Phyllis Place and Mission Valley and analyze whether police and fire response times would be improved with the road connection, whether the road connection could serve as an emergency evacuation route, whether it is feasible to make the road available for emergency access only, and whether the pedestrian and bicycle access would be improved by the street connection. Also, the resolution states that “the initiation of a community plan amendment in no way confers adoption of a plan amendment and City Council is in no way committed to adopt or deny the amendment...” The final decision maker is the City Council.

DD-2

Conclusion: Police and Fire response times would be slower with connection due to extremely heavy traffic and delays up to 43 minutes to a community that only has one egress and ingress. An emergency route already exists at Kaplan Drive and Aperture Circle in the proposed study area and has been ignored even when evidence was presented at every stage of this EIR. The already existing emergency assess has pedestrian walk ways and bicycle assess, even disability ramps and was not considered nor mentioned at all in this EIR except in letters in Appendix A from 2012. Pedestrian and bicycle assess would not be improved by the proposed project as it already exists and will be expanded by the development of the trail system through the Park on Phyllis Place. The current access and trails will encourage pedestrians and cyclists to use mass transit without vehicular traffic to compete with and the current connections all link to mass transit. The analysis fails to support neither the road connection nor any of the reasons for the community plan amendment and should be denied.

DD-3 | The attached document is my personal letter to the San Diego City Planning Department addressing my comments and questions regarding the Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048. Please address my comments and questions and include in the Final EIR.

DD-4 | I am AGAINST the street Connection and agree with the official Serra Mesa Planning Groups Position Statement AGAINST amending the Serra Mesa Community Plan to include the street connection. This Position Statement was approved at the SMPG meeting on 6/16/2016 and 5/18/2017 to be sent to the City Planning Department with a unanimous vote. SMPG recommends AGAINST amending the Serra Mesa Community Plan to include the street connection. The surveys conducted in the community over the years indicate overwhelming opposition to the street connection. The Serra Mesa Planning Group and members of the community have repeatedly expressed strong opposition to the street connection in writing and in person at all stages of the development process for Quarry Falls/Civita and continue to express their opposition to the proposed Community Plan Amendment.

I am in opposition of the Franklin Ridge Road connection and the initiative to amend the Serra Mesa community plan to include it. The Connection will increase traffic in Serra Mesa, Mission Valley and I805, making traffic improvements to Mission Valley at the 163, 8 and 15 makes more sense.

DD-5 | -
The road connection looks promising “in theory,” that is until you read the traffic analysis in the Draft Environmental Impact Report (DEIR). The DEIR analyzed traffic and concluded unmitigable delays at the 805 onramps, 31-43 minutes with the connection versus the alternative of continuing to have less than 15 minute delays without the road connection. According to the DEIR without the connection the favorable conditions will persist even with new developments, under the heaviest traffic times through the year 2035.

DD-6 | A reason for the road is to connect the “unconnected” neighborhoods of Mission Valley and Serra Mesa. Although a quick search on google maps show they are already connected by Mission Center Road in the west and at Mission Village Drive in the east, 2.4 miles (5 minutes) apart on Friars Road. Additionally, there is existing emergency access between Kaplan Drive and Aperture Circle not mentioned in the DEIR. Regardless of the road connection there will be bicycle and pedestrian path connecting Mission Valley to Serra Mesa through the Park South of Phyllis Place. If the connection is approved the road will split the planned park in two parts rendering the space less useable and endangering pedestrians and bicyclists with a busy 4 lane road and intersection instead of a traffic free trail (this safety issue was not mentioned in the DEIR).

DD-7 | All the road connection will do is funnel heavy commercial traffic from Mission Valley and Texas Street up through the new residential neighborhood of Civita onto Phyllis Place in Serra Mesa in order to get to the 805 freeway which cannot support more traffic. To make matters worse Phyllis Place is and will remain the only access road to over 200 low-density residential houses in the Abbots Hill area, effectively ruining the community by slowing emergency services and safe reliable transportation for the residents in the area. Road connections involving this much traffic (34,540 cars per day), should not block a community with only one exit and entrance, it is not appropriate to put this type of infrastructure though a residential community. The 805 needs to be able to be accessed from Texas Street on the south side of Mission Valley and not go through a

DD-7
(cont'd) ↑ neighborhood to do it. Infrastructure needs to be improved at Mesa College Drive to allow cars to go north on 805 and 163. Currently to go north cars must go south on I805 and turn around at Phyllis Place because there is not an option for north on either freeway at Mesa College Drive adding to traffic congestion.

DD-8 | The proposed road connection has very few benefits to the residential occupants of Serra Mesa or Mission Valley. In fact the only people that benefit are the developers in Mission Valley whose goal is to have lower impact fees for their new developments. This road connection has been denied multiple times already in 2004, 2005 and 2008 with little change or improvement to the original document. The previous PEIR was funded by \$249,193.54 of taxpayer money, now more with this recirculated DEIR. I would like the city to stop wasting taxpayers' money rehashing failed initiatives and use the money to come up with more productive alternatives such as investing in the already approved projects to improve the connection between Friars Road and the 163. The proposed projects will cost the tax payers money increasing the city budget without significantly improving anything. This proposal increases traffic on surrounding roads leaving the city to pay for mitigations that are not recommended. Changing the Mission Valley Community Plan to not include road, would save the city millions of dollars, increase walkability and make both plans consistent, meeting the DEIR objectives.

DD-9 | The proposed road connection does not serve the objectives: street connection does not result in less congestion, improved circulation, improved emergency access, evacuation routes or improve pedestrian and bike access between communities.

Problems with the Connection:

- DD-10 |
1. Few Significant Delays Without Connection
 2. Many Significant Delays With Connection
 3. Freeway Delays
 4. Ramps Delays
 5. Mitigations are not feasible and/or not recommended
 6. Contradicts City's General Plan, Mission Valley's Community Plan, Serra Mesa Community Plan and Master Bike Plan, and Master Pedestrian Plan.
 7. There are more long term benefits without the road: The DEIR shows a significantly negative impact to Mission Valley and Serra Mesa's roads, noise, and pollution, affecting everyone that travels the I805 from or to Phyllis Place/ Murray Ridge Road.
 8. The road connection undermines the pedestrian friendly residential community characteristics of our neighborhoods. See marketing promo video for Civita by Sudberry on youtube posted 12/10/2011 <https://www.youtube.com/watch?v=mM6F8u8RdQY>
 9. The connection does not encourage and effectively discourages the use of Mass Transit.

DD-11 ↓ I urge the City of San Diego:

DD-11 (cont'd)	<div>↑</div> <ul style="list-style-type: none"> • Do NOT recommend Serra Mesa Community Plan be amended to include a street connection on the basis that the DEIR does not meet project objectives to improve traffic and shows significant negative impacts on the environment for traffic, noise, and pollution. <ul style="list-style-type: none"> ○ Is the DEIR complete and in compliance with CEQA? <i>No. Alternatives not comprehensive. Information contradictory in multiple locations, fundamentally inadequate and conclusory. Emergency, pedestrian and cyclist access already exists in study area on Kaplan Drive, and more will be provided with trail through the park on Phyllis Place connecting the two communities.</i> ○ Approve or deny proposed CPA? Deny. <i>CPA does not meet proposed goals and does not benefit the residents of either community.</i>
DD-12	<ul style="list-style-type: none"> • Recommend that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.
DD-13	<p>“Project Objectives” of the proposed DEIR and reasons why the proposed CPA does not meet these objectives are as follows, including supporting DATA:</p> <p>1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.</p> <p><i>~Recommend alternative that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as multimodal linkage already exists at Mission Center Road and Mission Village Drive and access for cyclists and pedestrians at Kaplan Rd and Phyllis Place. Proposed CPA is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.</i></p> <ul style="list-style-type: none"> • <i>This amendment would not resolve the inconsistency between community plans as it also contradicts Mission Valley’s Community Plan (page 55) “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” The project objectives are not met and in actuality the proposal is less compliant with the City’s General Plan and Community plans than the No Project Alternative.</i>
DD-14	<p>2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.</p> <ul style="list-style-type: none"> • <i>~There are 3 times more significant Connection Intersection Condition delays with the road than without; this does not constitute improved local mobility in the Serra Mesa and Mission Valley planning areas. This undermines the pedestrian friendly residential community characteristics of our neighborhoods.</i>

- Significant Delays With Connection Appendix C 115/310 (page 64)

Intersection	Time	Delay (Min)	Delays with Mitigations
Murray Ridge & Sandrock	PM	58	25
Murray Ridge & I-805 NB Ramp	PM	149	56
Murray Ridge & I-805 SB Ramp	AM	80	21
Murray Ridge & I-805 SB Ramp	PM	404	113
Qualcomm Way & Friars Rd EB Ramp	PM	61	49
Qualcomm Way & Friars Rd WB Ramp	PM	77	41
Via Alta & Franklin Ridge Rd	AM	44	39
Via Alta & Franklin Ridge Rd	PM	96	54

- Significant Delays Without Connection Appendix C 104-105/310 (page 53 &54)

Mission Center Rd & Murray Ridge Rd/Phyllis Pl AM 57 minutes, PM 117 minutes

-Previous PEIR stated 117 minute delay, in current DEIR 171 minutes is stated; please explain why this number changed or if it is in fact an error.

In the long term all the following 12 study items are better WITHOUT the road connection **Very significant, within acceptable operation without Connection*

Roadway Segment

1. Phyllis Pl from I-805 SB Ramp to I-805 NB Ramp
2. Rio San Diego from Qualcomm Way to Rio Bonito Way
3. **Franklin Ridge from Via Alta to Civita*
4. **Phyllis Pl from Franklin Ridge to I-805 SB Ramp*

Intersection

5. *Murray Ridge /I-805 SB Ramp*
6. *Murray Ridge/I-805 NB Ramp*
7. *Murray Ridge/Sandrock*
8. **Franklin Ridge/Phyllis Pl*
9. **Franklin Ridge/Via Alta AM*
10. **Franklin Ridge/Via Alta PM*

Freeway Ramp Meter

11. **I-805 NB Ramp at Murray Ridge Road*
12. **I-805 SB Ramp at Murray Ridge Road*

In the long term the following 3 study areas are better WITH the road connection **Very significant, within acceptable operation with Connection*

Intersection

DD-15
(cont'd)

1. Qualcomm Way/Friars Road WB Ramp in PM only
2. [Mission Center /Murray Ridge AM](#)
3. [Mission Center /Murray Ridge PM](#)

Appendix C 88/310 (page 37), Appendix C 100 & 101/310 (page 49 & 50)

DD-16

3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.

~Proposed CPA does not meet project objectives as the DEIR traffic analysis concluded unmitigable delays at the 805 onramps, 31-43 minutes with the connection versus the alternative of continuing to have less than 15 minute delays without the road connection, even with new developments, under the heaviest traffic times through the year 2035. Long Term (2035) With Connection Conditions Appendix C 112/310 (page 61).

- Freeway

I-805 Freeway Mainline Condition is LOS F (AM & PM) with or without the road connection. I-805 is already heavily impact and there are no immediate plans to improve the area and in some cases it cannot be improved. "Where a mainline freeway impact is identified on the I-805 mainlines near the Murray Ridge Rd/Phyllis Place interchange no attempt to introduce a new freeway lane for mitigation has been offered, and that impact remains unmitigated." Appendix C corrected 7/206 previous PEIR, why was this sentence removed? Is it still true for the recirculated DEIR?

- Ramps Conditions Long Term (2035) With Connection Conditions Appendix C 112/310 (page 61).

WITH CONNECTION

- **I-805 NB ramp at Murray Ridge Road – 43 minutes of delay (PM)**
- **I-805 SB ramp at Murray Ridge Road – 31 minutes of delay (PM)**

WITHOUT CONNECTION, all ramps are calculated with less than 15 minutes of delay

DD-17

4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

~Proposed CPA does not support improved emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas as stated on page 210/432 of DEIR "Consequently, there is limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple ingress or egress routes."

- Kaplan Drive exists in this study area as an emergency access route and is not mentioned in the DEIR, this omission contradicts numerous pages in the DEIR.

DD-17
(cont'd)

~Proposed CPA does not improve circulation, traffic congestion, and safety for travel including cyclist and pedestrians, or emergency access. Existing conditions are superior to projected Road Connection conditions with corrected information.

DD-18

5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

~The CPA does not support its conclusion for safe street design although the No Project Alternative meets this objective with existing planned paths without vehicular traffic and lower stress to pedestrians and cyclists while not increasing the traffic as much shown on page 137/310 Appendix C.

DD-19

- “Based on the environmental analyses within this DEIR, the City has determined that the proposed project would result in significant and unavoidable impacts associated with the following issue area.
 - Transportation and Circulation
 - Result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system
 - Result in a substantial impact on existing or planned transportation systems
 - Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature.” DEIR 399/432

- The proposed CPA states “Mitigation measures are the specific environmental requirements for construction or operation of the proposed project that will be included in the Mitigation Monitoring and Reporting Program and adopted as conditions of approval for the proposed project.” DEIR 119/432.

The DEIR concluded on pages 38-42/432:

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.”

1. All of which are conditions to approval of the CPA and are not recommended.

DD-20

- Franklin Ridge Road “a four lane collector road including bicycle and pedestrian facilities” to I805 SB is predicted to have 34,540 cars per day, DEIR page 191&205/432. According to Roadway Capacity Standards on page 137/310 (Appendix C) that amount of cars is consistent with a Major Arteria or Prime Arteria not a collector street which Franklin Ridge Road is classified as.

DD-21

- The CPA includes a class II bike lane which does not protect cyclists from cars like the current plan with a vehicle free bike path going through the park South of Phyllis Place connecting the two communities to the greater San Diego regional bike network, making the proposed CPA not as safe for cyclists as existing plan.

DD-22

- The proposed CPA would cause road delays of 40-96 minutes increasing traffic on Franklin Ridge Road and limiting mobility by not allowing the community to feel safe to walk drive or ride a bike. Appendix C 92&93/310 (page 41&42)

DD-23

- The Serra Mesa Community Plan states “There is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers” (45/77 page 37).

DD-24

- Mission Valley Transportation Plan states “Safety Pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles. 5/10 (page 38)” “Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike. In general, stress levels are high along most roadways in Mission Valley, regardless of the presence of bicycle facilities due to high traffic speeds, the high number of auto travel lanes, as well as the limited space given to the cyclists. 7/10 (page 40)”
https://www.sandiego.gov/sites/default/files/4_transportation.pdf”

* “Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.” This was on last PEIR, why was this objective removed?

DD-25

~General Plan and Bicycle Master Plan are already implemented without CPA. There is existing interconnectivity between communities by way of Mission Center Road, Mission Village Drive, Kaplan Drive (Emergency, Cyclists and Pedestrians) and Phyllis Place Park that will have a walking and bike path.

- The proposed CPA conflicts with the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities, the proposed increase in traffic decreases safety for pedestrians and cyclists and does not increase connectivity as connectivity is already planned with a trail at connection location.

DD-26

- Mitigations that are conditions of approval for the proposed project include the removal of bicycle lanes in Serra Mesa in direct contrast to the city's Bicycle Master Plan and environmental progress.

“Roadway Segments

1. Impact TRAF-1: Murray Ridge Road, from Mission Center Road to Pinecrest Avenue

MM-TRAF-1: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Mission Center Road to Pinecrest Avenue to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.

DD-26
(cont'd)

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, **the impact would remain significant and unavoidable**." DEIR 186-187/432

DD-27

For the aforementioned reasons this DEIR is incomplete and not in compliance with CEQA and must be denied. This DEIR does not meet the objectives and shows significant negative impacts on the environment for traffic, noise, and pollution.

- Recommend that Mission Valley revise Community Plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities. Will this be done? Please include all information in this discussion of the project objective in the final EIR as it proves and provides evidence supporting the No Project Alternative and must be included per CEQA.

DD-28

This chart summarizes the major issues that have been described in the body of this letter.

Deficiency	Item/Comment
Omission	Emergency, bike, and pedestrian access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita (Mission Valley). ^{2,3}
Omission	Multifamily units at City View Church are Retirement/Senior housing (sensitive receptors) located less than 400' from the connection ^{2,3}
Omission	Mission Valley Community Plan is in the process of being updated; inconsistency could be corrected at this time. ³
Omission	Trail for pedestrians and bicyclists linking Civita and Phyllis Place Park will be provided. ^{1, 3}
Omitted in discussion	Mission Center Road and Mission Village Drive provide a direct link between Serra Mesa and Mission Valley. This was not included in the sections discussing linkages. ³
Violates City Policies and Goals	<ul style="list-style-type: none"> • Walkable Community and City of Villages^{1, 2,3} (e.g., impacts on bisected park and roadway connection will increase traffic on Civita local streets). • Fosters auto dependency ^{2,3} (e.g., roadway connection won't encourage mass transit usage).³ • Vehicle congestion relief ³ (e.g., bar charts in this letter show an increase in congestion in Serra Mesa and Mission Valley). • Bicycling¹ (e.g., mitigations require bike lane removal) ³ • Safe and efficient street design (e.g., safety of bisected park; City View driveway deemed to provide a safety hazard for vehicles entering or exiting at City View) ^{2, 3}

Deficiency	Item/Comment
Violates Serra Mesa Community Plan	<p>References from SMCP:</p> <ul style="list-style-type: none"> • Street widening and other improvement should be minimized.³ • Safe transportation system with minimal adverse effects.³ • Steep hillside and canyons protected and preserved.³
Traffic Study & Analysis Inadequate; Data may be invalid	<ul style="list-style-type: none"> • Inadequate Traffic Impact Study (traffic counts conducted in 2011; at least 6 consultants involved in collection and analysis).³ • Impact of queuing on residential area not studied (e.g., long term 31 min delay at I-805 SB Ramp PM).³ • Study not comprehensive – Not studied: the adjacent main streets of Serra Mesa (e.g., Greyling Dr), Texas St (a direct thoroughfare), Friars near Qualcomm Stadium.³ • Induced traffic not studied.³ • Not all of the proposed and/or approved projects for Mission Valley are included in the study.³ • If roadway connection not approved, developer will make improvements to Mission Center Rd. These improvements aren't considered in the analyses.³
Air Quality & Noise Analysis Validity	<ul style="list-style-type: none"> • Impacts on sensitive receptors not studied.³ • Air quality and Noise analysis is based on traffic study and will be invalid if the Traffic Impact Study is invalid.³
Contradiction	7% grade stated but approved Quarry Falls EIR indicates a deviation from standards (required when greater than 8%).
Inconsistency	Description of Phyllis Place from Franklin Ridge to I-805 SB ramp described as widening in MM-TRAF-3 and as reconfiguring in MM-TRAF-11.
Mitigation Analysis Inadequate or Infeasible	<ul style="list-style-type: none"> • Detailed description not provided for all mitigations (e.g., Murray Ridge and I-805 NB and SB ramps). • Impact on environment for mitigations not studied/discussed (e.g., land needed for widening of Phyllis Place from two lanes to five lanes).³ • Impact of implementation of mitigations on adjacent streets not studied/discussed (e.g., Raejean, Greyling Dr, etc.).³ • Implementation of 8 of the 19 mitigations would violate City's land use and mobility policies.
Objectives Not Met	Both stated objectives (which aren't the exact same ones as listed in the DPEIR) and City Council's objectives (see references in letter) aren't met.
Conclusion Not Based on Evidence	Negative aesthetic site of project and substantial alteration to existing or planned character of area considered insignificant. Evidence: park bisected by roadway and ADTs increase from 2,420 (existing) to 34,540 (long term)

DD-28
(cont'd)

Deficiency	Item/Comment
Conclusion Not Based on Evidence	The No Build/Remove from Mission Valley Community Plan Alternative was rejected. "This alternative is rejected because it would not meet any of the project objectives..." The conclusion isn't based on facts: multi-modal linkage exists, trail for pedestrian and bike access will be provided; emergency access exists; increase in congestion if roadway connection built; improvement to Mission Center Rd, if roadway connection not approved; DEIR admits that the roadway connection creates a "safety hazard" for vehicles entering and exiting at the City View Church (not building the roadway connection is a safer design than building it); data supporting contention that the City's Climate Action Plan and Bicycle Master Plan Update would be inconsistent not provided. This alternative is feasible.
Conclusion Not Based on Evidence	<ul style="list-style-type: none"> DEIR indicates the alternatives would result in greater impacts associated with transportation and traffic. Cumulative impact bar chart analysis proves the roadway connection results in greater impacts in Serra Mesa. Many of the mitigations are infeasible. Any analysis using any infeasible mitigation to show a less-than-significant impact is inaccurate.

¹ Refers to Final PEIR for the Quarry Falls Project, dated July 2008

² Refers to Notice of Preparation, Scoping Meeting held in February 2012

³ Refers to Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report, dated 4/15/2016

DD-29

As indicated in the chart comments were made and submitted during the NOP and the DPEIR timeframe. The corrections weren't made to this DEIR. This recirculated DEIR is inadequate and many of the mitigation measures are infeasible due to conflicting with the City's land use and mobility policies and/or cost.

DD-30

Furthermore, CEQA requires that a project be analyzed and considered without bias. In discussing the No Build/Remove from Mission Valley Community Plan Alternative this statement is made "... the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)

The City knew in 2008 prior to the development of the Climate Action Plan (2015) and the Bicycle Master Plan (2013) that there was a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan. Yet, they included the roadway connection in the plans, signifying a bias. The bias is indicated in this DEIR with the omission of pertinent facts and in the selection of objectives. These objectives were used to determine the feasibility of alternatives and were used to reject the No Build/Remove from Mission Valley Community Plan alternative.

Objectives

The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Why weren't these objectives, as directed by the City Council, used in the studies and analyses? Will the above information be added to the appropriate sections of the DEIR? If not, provide an explanation for the exclusion.

The objectives that are being used for this recirculated DEIR aren't exactly the same ones that were used in the DPEIR. These are the ones with substantive changes:

DPEIR	Recirculated DEIR	Change
Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.	Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.	Multi-modal linkage from Friars Road replaces connection from Mission Valley
<p>Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could:</p> <ul style="list-style-type: none"> • Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas. 	Improve local mobility in the Serra Mesa and Mission Valley planning areas.	Local mobility replaces overall circulation network
<ul style="list-style-type: none"> • Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities. 		Deleted from the recirculated DEIR

Why were changes made to the objectives?

Was the General Plan and Bicycle Master Plan objective removed because the mitigations would require the removal of bike lanes and this objective would conflict with these plans?

DD-34 | *Was overall circulation network removed because the traffic study did not encompass the entire Serra Mesa and Mission Valley planning areas?*

DD-35 | *The Mission Valley Community Plan states that the connection should be from Stadium Way (Qualcomm Way).*

DD-36 | The following objectives weren't listed in City Council Resolution 304297 (October 2008):

- Improve local mobility in the Serra Mesa and Mission Valley planning areas.
- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

What is the source for the objectives not stated in the resolution? Will the source for the objectives be added? If the source isn't added, provide an explanation for the exclusion.

Alternatives

DD-37 | Selection of Objectives: The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

If these objectives had been used, as required by the City Council as the project's objectives instead of the objectives selected by staff in the studies and the analyses, what would be the conclusion for each alternative?

DD-38 | Table 9-1. Summary of Significant Effects of the Proposed Project doesn't list: Results in a negative aesthetic site or project and Results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. The project is a roadway (in general, roadways are not considered a positive aesthetic) creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is, permanent and substantially changes the character of the area. This impact is Significant.

DD-39 ↓ Alternatives Considered but Rejected

DD-39 (cont'd)	<p data-bbox="219 195 1442 258">↑ No Build/Remove from Mission Valley Community Plan Alternative - “This alternative is rejected because it would not meet any of the project objectives...” doesn’t consider the following:</p> <p data-bbox="284 289 1214 321">1. Resolve Community Plan Inconsistency by Providing Multi-modal Linkages</p> <ul data-bbox="211 359 1409 525" style="list-style-type: none"> <li data-bbox="211 359 1300 390">• Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge. <li data-bbox="211 394 1401 457">• A minimum of one trail for pedestrian and bike access will be built between Civita and Phyllis Place Park with or without the road. <li data-bbox="211 462 1409 525">• Pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
DD-40	<p data-bbox="284 562 1425 594">2. Improve Local Mobility – In addition to the items listed in #1, consideration is not given to the</p> <ul data-bbox="211 632 1417 766" style="list-style-type: none"> <li data-bbox="211 632 1417 730">• Gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicle accessing I-805. This gridlock will limit the mobility for the 200+ single family dwellings and the 56 retirement homes west of Franklin Ridge. <li data-bbox="211 735 1105 766">• Improvement to Mission Center Rd if roadway connection isn’t approved.
DD-41	<p data-bbox="284 804 1360 867">3. Alleviate traffic congestion and improve navigational efficiency between Serra Mesa and Mission Valley</p> <ul data-bbox="211 905 1455 1039" style="list-style-type: none"> <li data-bbox="211 905 1016 936">• Options exist with Mission Center Road and Mission Village Drive. <li data-bbox="211 940 1455 1039">• Alleviate traffic congestion – Refer to bar chart analysis in this letter that shows the roadway connection for the most part does not alleviate traffic congestion in Serra Mesa and Mission Valley and worsens the congestion in Serra Mesa.
DD-42	<p data-bbox="284 1077 1455 1140">4. Improve Emergency Access and Evacuation – Emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.</p>

DD-43	<p>5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimize environmental and neighborhood impacts. Under Traffic Hazards (5.2.6) it's stated that "Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (Impact TRAF-19), and mitigation is required."</p> <p>Also, in this same section is the following comment "However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project." Additionally, it's stated "However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable." (5.2.6.1)</p> <p>The City's analysis indicates that Franklin Ridge Road will create an unsafe situation that is "significant and unavoidable." Given the situation described by this document, explain how this situation meets the objective to create a safe design and discuss liability issues regarding this unsafe situation. Also, refer to the other sections of this letter that describe environmental and neighborhood impacts.</p> <p><i>Explain how these objectives are met when the information described in this response for each objective is considered.</i></p>
DD-44	<p>"...For example, the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended." (9.4.1.2)</p>
DD-45	<ul style="list-style-type: none"> • Cite the reference in the City's Climate Action Plan that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley. <ul style="list-style-type: none"> ◦ Are there other assumptions that were made in the Climate Action Plan that will require additional analysis (e.g., removal of the Regents Road Bridge from University City planning area)? ◦ List the other projects that require removal from the plans and the process they went through for removal.
DD-46	<ul style="list-style-type: none"> • Cite the reference in the Bicycle Master Plan that describes this assumption. This plan shows a proposed bike path and bike lane in the Franklin Ridge area. There will be a bike path with or without the road. Without the road there will not be a bike lane. What would require updating in the Bicycle Master Plan if the roadway connection wasn't approved? Proposed doesn't mean it will happen.
DD-47	<ul style="list-style-type: none"> • The Mission Valley Community Plan is in the process of being updated. Will an environmental analysis be needed for this community plan update process? Could the removal of the road connection from the Mission Valley Community Plan be made during this update process? <p>This alternative meets most of the objectives cited for the project and is feasible. This alternative should have been considered.</p>
DD-48	<p>Analysis of Alternative 1 - No Project Alternative</p>

DD-48 (cont'd)	<p>Many of the issues that were discussed in the No Build/Remove from Mission Valley Community Plan Alternative section apply to the No Project section.</p> <p>The analysis doesn't mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments.</p> <ul style="list-style-type: none"> • The Sand and Gravel Re-use Development section (p. 56) states "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." This statement is consistent with the Serra Mesa Community Plan. • "Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed." (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.
DD-49	<p>Mission Center Road and Mission Village Drive provide multiple linkages between Serra Mesa and Mission Valley. Will this information be added to the analysis and considered in the conclusion? If not, provide an explanation for the exclusion.</p>
DD-50	<p>"...Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project. Describe the criteria used to reach the "greater" conclusion.</p>
DD-51	<p>If the inconsistencies in the Mission Valley Community Plan which probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, would the impacts be considered "greater"?</p>
DD-52	<p>Conclusion – The following information was not included or discussed in this draft EIR: Emergency access exists between Aperture Circle in Civita and Kaplan Drive Serra Mesa, the completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages, the developer will provide a minimum of one trail connection for pedestrians and bikers between Phyllis Place Park and Civita in Mission Valley, and Mission Center Road is a direct route connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley.</p> <ul style="list-style-type: none"> • If this information were included and used in the evaluation, what would be the impact on the "No Project" alternative? • If the issues that staff was required to study as defined in the City Council resolution were considered, what would be the outcome? (Refer to Objectives section of this letter) • If the mitigable impacts that will probably not be implemented are considered, what would be the outcome?
DD-53	<p>Air Quality – If an analysis of air quality in the Hye Park condominium complex area is conducted and shows a significant impact without the street connection, will this result be added and discussed? If not, provide an explanation for the exclusion.</p>
DD-54	<p>The No Project Alternative would meet most of the objectives. Refer to the discussion in this letter for No Build/Remove from Mission Valley Community Plan.</p>
DD-55	<p>Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative</p>

- DD-55 (cont'd)
- Land Use – The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?
- DD-56
- Transportation/Circulation and Parking – Refer to the Transportation/Circulation and Parking section of this letter. Questions are raised about the validity of the Community Access data. If this data is revised, would the conclusion change?
- DD-57
- Relationship to Objectives – Refer to the Objectives section of this letter. If staff were to study the objectives as defined in the City Council resolution, what would be the outcome?

Environmentally Superior Alternative

DD-58

The conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities.

- Linkages already exist with Mission Center Road and Mission Village Drive and the Mission Valley Community Plan contains inconsistencies.
- The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.”

Additionally, it’s stated that “...both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project.”

- DD-59
- The studies don’t necessarily support this conclusion for the “Alternative 1- No Project Alternative” and “Alternative 2 – Bicycle, Pedestrian, Emergency Access Only Alternative.” Also, refer to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-33).
 - With the street connection there is a 43 minute delay at I-805 with the mitigation. The “No Street Connection” shows 15 minute delays on I-805 (Appendix C), which is within the acceptable range in the year 2035. The data doesn’t support the analysis that “would result in greater impacts associated with transportation and traffic...” (9.5.3) Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion.

What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered? For discussion, refer to 9.4.1.2

DD-60

It’s stated that “...these impacts would be mitigated to less-than-significant levels under the proposed project.” The problem with that statement is that many of the mitigations are infeasible. Refer to the Mitigation section.

DD-61

The statement is made “Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.” This statement is inaccurate. Traffic will be worse with the project. Refer to the Cumulative Impact Analysis section.

DD-62

The following are quotes from the DEIR, my comments and questions directly relate to the DEIR, some quotes are from the previous PEIR and the questions still pertain to this recirculated document and still need to be addressed. **I am requesting all be addressed per CEQA:**

Per CEQA:

“Significant environmental effects that could result if the project is approved and implemented... describe reasonable alternatives to the project (State CEQA Guidelines Section 15121).”

DD-63 **The alternatives are not reasonable and were not explored due to the main focus being amendment of the plan rather than what is better for both communities.” Please describe reasonable alternatives to the project per CEQA such as decrease development in Mission Valley. The alternatives in this document do not accurately reflect the underlying goal of the DEIR: to have a road connection. The underlying goal is hidden resulting in narrow focused objectives not allowing exploration of reasonable alternatives per CEQA.**

“Based on the environmental analyses within this DEIR, the City has determined that the proposed project would result in significant and unavoidable impacts associated with the following issue area.

- Transportation and Circulation
 - Result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system
 - Result in a substantial impact on existing or planned transportation systems
 - Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature.” DEIR 399/432

DD-64 **By not being able to mitigate significant impacts the proposed project is not superior; the reason to amend the plan is to improve traffic circulation and congestion which this DEIR proves not to be the case. Why would we continue with this project when the objectives are not met?**

“Mitigation measures are proposed to reduce Project impacts, however, not to below a level of significance.”

DD-65 **Therefore the project does not meet proposed goals and money should be spent improving the 8, 163 and 15 entrances to improve traffic circulation and congestion as the 805 is backed up already and will continue to be if more access is created by this connection. Why not spend money (ex. impact fees) on freeways that are not at LOS: F during rush hour?**

Page 171/432

“The Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity. No new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition”

DD-66 **False, there is already connectivity between the two communities at Mission Center Road and Mission Village Drive as well as Kapan Drive and Aperture Circle, along with trails and Handicap access. Is**

DD-66 (cont'd)	<p>waiting time affecting gas mileage and emissions considered in VMTs. Is neighborhood character and density considered in VMTs? Will it be? If not why not? If VMTs are supposed to be more environmentally friendly is waiting in traffic more environmentally friendly then driving slightly further? Explain.</p>
DD-67	<p>Page 193/432 “As shown in Table 5.2-17, the proposed project would cause a significant long-term cumulative impact on the following four study area intersections. λ Murray Ridge Road and Sandrock Road (LOS E, PM peak hour) (Impact TRAF-14) λ Murray Ridge Road and I-805 NB ramps (LOS F, PM peak hour) (Impact TRAF-15) λ Murray Ridge Road and I-805 SB ramps (LOS E and F, AM and PM peak hour, respectively) (Impact TRAF-16) λ Via Alta and Franklin Ridge Road (PM peak hour) (Impact TRAF-17)” Explain how VMTs are more important than these impacts?</p>
DD-68	<p>Page 197/432 “As shown in Table 5.2-18, all metered on-ramps within the project study area are projected to operate with fewer than 15 minutes of delay with the exception of the following during the PM peak hour. λ I-805 SB on-ramp at Murray Ridge Road (31 minutes of delay) (Impact TRAF-18) Based on the criteria outlined in Table 5.2-9, the proposed project would cause a significant direct impact on this metered freeway on-ramp.” Where is the 43 minute delay that is mentioned in other place in the DEIR, will it be added on page 197/432? If not why not?</p>
DD-69	<p>Page 200/432 “With the proposed project, VMT within the study area would be 720,196, a 1.8 percent decrease in VMT when compared to the baseline condition in Year 2035. Region-wide, the VMT with the project would be 1,629,137, a 0.28 percent decrease compared to the baseline condition in Year 2035. Therefore, as <u>the proposed project would reduce VMT</u> within the study area and the region, impacts would be less than significant. Significance of Impacts Based on the City’s significance thresholds outlined in Table 5.2-9, <u>the proposed project would result in significant direct impacts on four roadway segments, three intersections, and one metered freeway on-ramp during the Long-Term scenario.</u>” Why do reduced VMTs correlate to impacts being less than significant? The table below from page 200 are significant impacts are why the proposed project should be denied. Please explain why VMTs are more important than these impacts?</p>
DD-70	<p>Page 200/432 “Table: Roadway Segments λ Franklin Ridge Road, from Via Alta to Civita Boulevard (Impact TRAF-8) λ Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (Impact TRAF-9) λ Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (Impact TRAF-10) λ Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (Impact TRAF-11) λ Phyllis Place, from I-805 SB ramps to I-805 NB ramps (Impact TRAF-12) λ Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (Impact TRAF-13) Intersections λ Murray Ridge Road and Sandrock Road (Impact TRAF-14) λ Murray Ridge Road and I-805 NB ramps (Impact TRAF-15) λ Murray Ridge Road and I-805 SB ramps (Impact TRAF-16) λ Via Alta and Franklin Ridge Road (Impact TRAF-17) Freeway Ramp Meters λ I-805 SB on-ramp at Murray Ridge Road (Impact TRAF-18)”</p>

DD-70 ↑ These significant impacts are why the proposed project should be denied. Please explain why VMTs are more important than these impacts?
(cont'd)

DD-71 Page 207/432
Table shows 31 min delay would be gone with mitigation but it is not possible to mitigate so how can delay be shown mitigatable when it cannot be done? Remove that the delay would be gone with mitigation because it cannot be mitigated.

DD-72 Page 231/432
“The proposed project’s traffic report (Appendix C) evaluated the level of service (LOS) (i.e., increased congestion) impacts at the intersections affected by the proposed project.”
The DEIR did not evaluate VMT directly and used old data. The goal was to relieve congestion not VMT, VMT does not relieve congestion or environmental impact of traffic if waiting in congestion for long periods there is no benefit to go a shorter distance. Please explain why VMT is a good measure to determine significance verse LOS?

DD-73 Page 328/432
“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.”
This is relevant to the general plan and contradicts the proposed project as Abbots Hill is a closed looped sub-division and the layout is dictated by the topography. The proposed road location is dangerous and will negatively affect all areas around proposed connection.

DD-74 Page 343/432
“City of San Diego Climate Action Plan In December 2015, the City adopted its CAP, which identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual (BAU) projection for emissions at 2020 and 2035, State targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.”
How do VMT’s fit with the Climate Action Plan? Explain how VMT’s relate to emissions when waiting in traffic.

DD-75 Page 348/432
Table 5.10-4 shows a negligible benefit of road connection in terms of VMTs. VMT does not correlate to anything with greenhouse gasses as LOS would increase time on the roadways increasing gases. Please explain why VMTs are a good metric?

DD-76 Page 417/432
“It would not decrease VMT within the study area or region and thus would result in a significant and unavoidable impact on freeway mainline segments. The Bicycle, Pedestrian, and Emergency Access Only Alternative would not result in any traffic hazards and would provide a connection for alternative transportation users, including cyclists and pedestrians. Overall, this alternative would result in slightly greater impacts compared to the proposed project as it would not decrease VMT and impacts would similarly be significant and unavoidable.”
VMT do not correlate directly with freeway mainline segments and therefore should not be used to determine that impacts would be similar. Please explain how VMTs create similar impacts and elaborate on environmental impacts specifically emissions and waiting in traffic verse longer VMTs in less traffic.

DD-77 | “Both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region.”

True they would not decrease VMT, but if you have to wait in traffic for 43 minutes wouldn’t that be worse for the environment and have a more significant impact then driving an extra 0.3 miles to go up Mission Center Road instead? Will this be studies if not why not? City and Highway gas mileage is significantly different because of time spent idling will this be taken into account as more important and significant that VMT? If not why not?

DD-78 | Page 420/432

“However, because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative.”

Since the no project alternative is superior will the proposed project be rejected, if not, why not?

DD-79 | For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative. This alternative would slightly reduce impacts associated with construction (i.e., biological resources, historical and tribal cultural resources) due to the narrower roadway and shorter duration of construction. It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.”

This is not true and just because VMTs will not be reduced with alternatives does not mean that alternatives are not superior for other reasons as the alternatives meet most of the other objectives. The significant and unavoidable impacts of the proposed project are so detrimental to the environment and the affected communities that the alternatives are far superior. Please correct false logic as VMTs do not determine superiority by themselves.

DD-80 | The No Project Alternative allows Bicycle, Pedestrian, and Emergency Access that currently exists and is in compliance with the General Plan, Serra Mesa Plan and Bike Master Plan. There is intercommunity connectivity at Mission Center Road and Mission Village Drive. There is bike and emergency access at Kaplan Drive and Aperture Circle connecting Civita and Abbotts Hill neighborhoods. There will be a trail that will connect Serra Mesa and Mission Valley directly onto the Master Bike Paths in the city. A trail is safer and more heavily used by cyclists and pedestrians than a road with vehicular traffic. A trail also increases the use of Mass Transportation/ Transit. There are letters in Appendix A stating the existence of Emergency Access at Kaplan Drive so why was it not included in the study? Will it be corrected? If not, why not?

DD-81 | -

Amending the Mission Valley Plan to align with the Serra Mesa Plan will completely solve the plan inconsistencies and the project objectives are already met with the current connections in existence. Explain the impacts of amending the Mission Valley Community Plan with the corrected information about emergency access and bike and pedestrian access with the Park as this should have been researched further to be compliant with CEQA.

DD-81

There will already be a park with bike and pedestrian access and there is already existing emergency access at Kaplan Drive, almost half the mitigations are not recommended yet doing all mitigations is a condition of approval. All General and Community Plans support future development increasing mass transportation instead of vehicular traffic. The proposed project would meet the goal of aligning the two community plans that goal is not an environmental goal and is not environmentally superior as the Mission Valley Plan could be amended to not include the connection for far less money and environmental impacts than the proposed plan. In fact if the money for this project was spent on improving onramps to surrounding freeways the goal of decreasing Mission Valley traffic and congestion could be achieved, will this be studied, if not why not?

DD-83

Alternatively there is an unnamed road on the East side of the 805 off of Friars Road that could be expanded or paralleled as it is very close to the 805 with no residences nearby. Could this area be a better alternative for the proposed CPA? Why was this alternative not studied as required by CEQA? Will it be studied? There are no residences on the unnamed road North off Friars parallel to the 805. Connection to the 805 from this road would solve the inconsistencies between plans and not impact the residence of Civita or Serra Mesa as much as well as be consistent with Plans. Will this be considered?

Page 407/432

9.4.1.2 No Build/Remove from Mission Valley Community Plan Alternative

DD-84

"1. This alternative would resolve the inconsistency between community plans; however, it would not provide a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, as no roadway would be constructed, thereby limiting multi-modal options between these roadways. Therefore, it would not fully meet this objective."

False, multi-modal linkage already exists at Kaplan Drive and the trails on Phyllis Place linking Friars Rd to Phyllis Place neighborhoods meeting this objective. This allows from pedestrians, cyclists and emergency vehicles'. In addition the two communities are also linkages at Mission Center Road and Mission Village Drive. Please explain how the objective is not already met?

Page 408/432

DD-85

"2. This alternative would not improve local mobility in the Serra Mesa and Mission Valley planning areas, as no roadway would be constructed, thereby limiting routes between these planning areas."

Explain hoe local mobility doesn't already exist and meet the General and Master Bike Plans of the City by encouraging the use of mass transportation and no vehicular travel?

DD-86

"3. This alternative would not help to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, as no roadway would be constructed, thus limiting access options for those in the areas within the vicinity of the project site."

DD-86
(cont'd)

↑ Explain how this option would not alleviate traffic congestion as multi-modal routes of transportation such as the pedestrian and bicycle paths would decrease the use of vehicular use and decrease traffic congestion. Will this be studied if not why not?

DD-87

“ 4. This alternative would also not improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, as it would not provide additional ingress/egress for emergency responders, nor would an additional emergency evacuation route be created.”

Blatantly FALSE, there is an already emergency access route at Kaplan Drive and Aperture Circle that currently exist between the two communities in the study area. This connection has been known about since at least 2012 as mentioned in Appendix A, why does this emergency access route continue to be ignored? The two communities already have emergency access that is less congested and faster responding then if there were thousands more cars to compete with between the two neighborhoods. Also most of those cars would not be in the interest of connecting the two communities and would only be to access an already failing I805, not benefiting linking the communities at all. Please explain how the proposed link will improve access with increased traffic?

DD-88

“ 5. Finally, this alternative would not provide a safe and efficient street design for motorists, cyclists, and pedestrians, as no roadway would be constructed. Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City’s Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions.”

Please explain how a road without vehicular traffic would not benefit cyclists and pedestrians making a safe and efficient street design? Where is this studied? Just because other plans have been updated to include this connection does not mean it has to be done or other plans cannot be changed. Will other plans be updated to not include connection because it has been shown to not be the environmentally superior option? Completing the road project should not be done just because it is in other plans. This logic is circular and should not be used to justify not removing the connection in the Mission Valley Plan. Will this be removed as a reason Mission Valley’s plan can’t be the one to be amended? If not why not? Give examples of why it is justifiable to not amend Mission Valley’s Plan. This DEIR was not instructed to look at inconsistencies with other land use plans, only the inconsistency between Mission Valley and Serra Mesa, explain why these other plans cannot be changed?

Why not amend the Mission Valley’s Plan not to include connection instead? The CPA does not show less congestion and improved circulation or improvement to emergency access and evacuation route but rather the opposite. Prove where in the data it shows otherwise if incorrect. Mission Center Road might have less cars traveling on it but would still back up further with traffic congestion because of the 25,000 more cars trying to get on the 805 from Franklin Ridge Road. Prove otherwise.

DD-89

↓ “The City’s General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for the establishment of effective mobility networks to effectively move workers and residents.”

DD-89
(cont'd)

↑ This goal of the General Plan would be met with the No Project Alternative as workers and residents have effective mobility networks through mass transportation designed for the Mission Valley area and use alternative modes of transportation such as walking and biking to effectively move workers and residents. Please explain and give proof of how transit and paths would not comply in current state without proposed project. How does the proposed CPA prove effective mobility networks based on proposed traffic delays of up to 43 minutes? Appendix C states the delays without connection would be acceptable under 15 minutes. Based on this contradiction please remove all blanket statements that the proposed CPA will improve mobility networks and replace with the truth as proven by the numbers in Appendix C that it will not be better than the No Project Alternative. VMT may be improved but that it not a good measure of climate improvement nor traffic congestion, prove otherwise or remove statement that VMT is an reason to approve project.

DD-90

“Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network.”

The No Project Alternative and the Bicycle, Pedestrian, and Emergency Access Only Alternative will encourage this interconnectivity of the pedestrian network and specifically establish a more effective mobility network. Can interconnectivity be accomplished by a pedestrian/bike only that is currently planned? Explain why a vehicular road is required to accomplish interconnectivity?

DD-91

Prove that the proposed plan would alleviate traffic congestion because it is not proven by the data. VMT would only matter if the speed and grade of the roads are similar. In this case the road connection is a much steeper grade and studied to slow traffic in some cases up to 43 minutes increasing gas demand and increasing emissions based on time to travel the same distance. Please prove otherwise.

DD-92

Page 34/432

“Project Objectives

The City has identified the following objectives for the proposed project:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. “

Multi-modal linkage already exists within the residential area west of Phyllis Place on Kaplan Drive and trails will link directly to Phyllis Place from Friars. Why was this link not considered already? Will it be? If not why not?

“2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.”

How would a road be better than a path without vehicle traffic, improving local mobility, walkability, traffic and pollution? How many vehicles will be local traffic and how many will be not local with this road connection? Local mobility will be improved without a road because

	<p>↑</p> <p>locals can safely walk and ride bicycle between the two communities. Explain how the CPA will improve 'local' mobility?</p>
DD-92 (cont'd)	<p>"3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas."</p> <p>How does a 43 min delay alleviate congestion? What is the delay without the road connection? Is bringing non local traffic through a residential neighborhood really improving navigational efficiency? Is it appropriate to use VMT if the shortest distance is on small residential streets endangering the residents not alleviating the residential traffic but adding to it? Please explain logic to using VMT to justify road connection to a major freeway through a local community.</p> <p>"4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas."</p> <p>Emergency access already exists within the residential area west of Phyllis Place on Kaplan Drive, how would increasing vehicle traffic improve access?</p> <p>"5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts."</p> <p>How would it be safer with vehicle traffic verse just a path with no vehicles?</p>
DD-93	<p>"• Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities."</p> <p>Why was this objective taken out of the recirculated DEIR? Is it no longer important to implement the General and Bicycle Plan? Please explain.</p>
DD-94	<p>Where is it discussed that the deviations from the General Plan and Master Bike Plan are justified and acceptable as required by CEQA? The mitigations are not recommended, how is it acceptable and justified to continue with a project that is not recommended?</p>
DD-95	<p>Traffic is less impacted with the No Project Alternative as proved by the traffic studies in Appendix C. Emergency access will be slowed with increased traffic and it will not be safe for pedestrians and cyclists with increase road traffic in Civita or Serra Mesa. Please remove false statement or prove conclusion otherwise with supporting accurate data.</p>
DD-96	<p>Goals of the General Plan are already met. Resolving the inconsistency in the two community plans can be done with an amendment to Mission Valley's Plan. It is environmentally superior to encourage biking</p>

DD-96 (cont'd) **and walking over driving in every respect decreasing traffic congestion and increasing efficiency. Is this true? Please prove otherwise.**

The alternative of amending the Mission Valley Plan and alternative routes to connect Friars to the I805 were not given appropriate consideration based on CEQA guidelines and need to be accurately vetted for environmental impacts in light of omitted information, will this be done? If not why not? Please explain reasoning.

Alternatives would solve most of the problems and mitigate significant impacts.

DD-97 393-394/432

"It is not anticipated that this project would result in the development of additional growth inducing projects as there is not much vacant, developable land within the project vicinity, and the Serra Mesa Community Plan designates most of the surrounding area as low density. Furthermore, the proposed project would not provide roadway access to an area that was wholly inaccessible (e.g., a roadway to a rural area from a highway). As previously detailed, the proposed project intends to connect existing urban communities and provide additional options within the transportation network. Impacts would therefore be less than significant."

Completely False, there is a huge amount of developable land in the project vicinity at Qualcomm Stadium. This linkage would be used by all the new High-density developments in Mission Valley funneling traffic through residential streets and 'low density housing' to get to a major "highway" I805. The roadway access directly blocks the entire community of over 200 homes in Abbots Hills area in a low density area with all the traffic of an urban area coming out on the only road that is the ingress and egress to the entire neighborhood. Making the neighborhood inaccessible to the residence that live in the neighborhood, blocked in or out by traffic getting to a highway. There are no restaurants or business in Serra Mesa at this connection and all retail must be accessed by crossing the bridge over I805 to where the other connection points already exist between neighborhoods, therefore the connection is only for access to the highway and not to link the local communities. Serra Mesa is not urban and much lower density than Mission Valley the impacts would be incredibly significant and destroy the communities. Please correct inaccurate information as most of the previous quote is not true. Please explain the validity in each sentence of the paragraph and show documentation to support conclusions.

DD-98 **"Population, health and safety, public services and facilities, and public utilities"**

The effects to population in the CIVITA and Abbots Hill Area, just to name a few, would be directly affected and affects would be very significant. If a project is compatible with the community plan the project does not have to be presented to the community planning group because it is already in agreement with the proposed plan. By amending the Serra Mesa Plan a road could be approve in the future and would not be required to be presented to the Serra Mesa Planning Group because it would be a statutory element in the Plan, the community would no longer be able to voice opposition. The connection change in the Community Plan may seem minor but directly affects the public's ability to have a voice and the connection once implemented would be disastrous for multiple communities. Sole

DD-98 (cont'd) | egress and ingress would be slowed by a predicted 43 minutes, resulting in delayed evacuation and emergency services. Therefore any statements that the proposed CPA is not significant are false and must be removed unless further proof is offered to the contrary.

DD-99

The DEIR is available for review by members of the public and public agencies to provide comments on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project might be avoided or mitigated.

This document has not been sufficient in identifying and analyzing the possible impacts on the environment or the ways effects might be avoided. There are existing conditions such as Kaplan drive that were not mentioned at all and this very omission is enough to change conclusions that support the connection. There are impacts to neighborhoods and traffic that are not mentioned. Negative impacts on circulation and emergency access were not addressed. What are the effects on circulation and emergency access when the delay for the freeway will be 43 minutes? Will emergency vehicles be able to get through the traffic and save someone's life? Will a private citizen be able to drive themselves to the hospital with delays of 43 minutes? Will residents be able to sleep with cars traveling by their house every 3 seconds as predicted in the traffic section of this DEIR, when their bedroom window is 10 feet from the road? Can children safely walk to school on Via Alta when there is only 1 cross walk and a car passing by every 3 seconds on average and most likely more often during school hours? Please address all these concerns in details and prove evidence that they were studied to be in compliance with CEQA.

Page 34/432

"Project Description, a portion of the Phyllis Place Park is located within the project site. The linear park would run along the south side of Phyllis Place. There are two approved general development plans for the park—one with the roadway connection and one without."

DD-100

Proposed plan will split this park in two and add vehicles, pedestrian and cyclist in the middle of the park where pedestrians and cyclists would have had paths will be traffic? Will children be able to kick a soccer ball on half a park? Is the park even worth using if it is divided by a 4 lane Major Artery Road? Was this considered? Will it be? Does it matter? Please explain.

Why was the park not considered in coming to a conclusion on land use?

DD-101

"The State of California requires each city to have a general plan to guide its future and mandates that the plan be updated periodically to ensure relevance and utility."

Plans should be changed to ensure relevance and utility. The proposed CPA is not irrelevant and nonutility as proved by the traffic study and therefore must be updated by California Law. Serra Mesa's Plan does not include Industrial uses of land as Mission Valley does. Therefore traffic from and to Industrial areas should not travel through residential neighborhoods of communities that do not contain industrials areas. Why was this not studied? Will it be included? Explain.

Page 121/432

“The project site has a General Plan land use category of Residential. As previously described, the project site is within the Serra Mesa and Mission Valley community plan areas. The Serra Mesa Community Plan designates the project site as “Low-Density Residential.” Within the Mission Valley portion, the project site is within the Quarry Falls Specific Plan area, which is designated as MultiUse under the Mission Valley Community Plan.”

DD-102

This Low-Density Residential area is only supported by one small road, the proposed CPA would endanger the safety and wellbeing of the entire neighborhood. Please update and study this information as it would be hazardous to the entire community to be blocked in by the proposed traffic on Phyllis Place, Via Alta and Franklin Ridge Road. It would not alleviate traffic and the additional connection would not benefit the community. Will this information be included in the DEIR? If not, why not?

Page 85/432

“2.3.3 Existing Pedestrian and Bicycle Circulation Network

The Quarry Falls project also included the provision of a network of publicly accessible trails and pedestrian amenities “to tie together the various open space, parks, recreation, and community activities” (page 3-17 of the Quarry Falls PEIR). A Park Trail was proposed that would traverse the Quarry Falls site from north to south...The pedestrian trail system, in conjunction with the street network, is proposed to serve pedestrians and bicyclists. In addition, the proposed Phyllis Place Park is a passive-use park that includes a decomposed granite pathway for pedestrians along the south side of Phyllis Place.”

DD-103

Thank you for mentioning this trail, but why is this trail not considered in the determination of pedestrian and cyclist access? This supports the No Project Alternative for reasons of connections already existing? Why was this trail not mentioned when coming to a conclusion? Why was the trail not considered access for pedestrians and cyclists without the connection? This quote proves that access will already exist. Conclusions stating that the proposed project will increase or improve access must be removed because access already exists and will be safer and increase mobility without vehicles sharing the road.

Page 131/432

“BICYCLE MASTER PLAN

DD-104

The City’s Bicycle Master Plan Update proposes Class II (Bike Lane) facilities along Phyllis Place with a connection to Via Alta, Franklin Ridge Road, and Civita Boulevard. The Class II Bike Lane is shown connecting north toward Phyllis Place and across I-805 to Murray Ridge Road. It is also shown connecting to Friars Road from two points on the south from Civita Boulevard.”

Class I Bike lanes are what will go in if this CPA is not approved. Proving that the Master Bike Plan will be met without the road connection and it will be safer without vehicular traffic. Why can’t goals of the Bicycle Master Plan be accomplished with the No Project Alternative? Doesn’t the No Project Alternative include a trail through the park that will be connected to the Master Bike Network? There is also

DD-104 (cont'd)	sidewalks and Bicycle access that was not mention in the DEIR on Kaplan drive in the study area including handicap compliance.
DD-105	<p>Pages 38-42/432</p> <p><u>“6 of the 19 mitigations violate City land use and mobility policies.</u></p> <p><u>8 of the 19 mitigations analyzed assume the mitigations will not occur.</u></p> <p><u>10 of the 19 mitigations which are conditions of approval would remain Significant and Unavoidable.”</u></p> <p>This justifies the conclusion that the No Project Alternative is superior and the CPA should be rejected! Would it be fiscally or environmentally responsible to approve such a project given the significant unavoidable problems? Please explain why such a project would be allowed to proceed?</p>
DD-106	<p>Page 121/317</p> <p>“Zoning</p> <p>Currently zoned by the City’s Municipal Code: RS-1-7, which is for single-family residential use (minimum of 5,000- square-foot lots).”</p> <p>Does the proposed CPA fit current zoning? Does a road with 35,000 cars a day belong in a single family use zone? Explain.</p>
DD-107	<p>“Regional Air Quality Plan”</p> <p>Proposed CPA does not fit current Quality but would with alternatives to the project. Why was this not mentioned as an impact?</p>
DD-108	<p>“Background”</p> <p>The proposed CPA will not result in less congestion or improved circulation, emergency access or evacuation routes as proven by the DEIR data results, in fact it will do the opposite on all accounts. The project was evaluated and has proven to have significant negative impacts on traffic and circulation and therefore must not be enacted. As the very reason for study (road connection) was proven to not be feasible, approving this plan would endanger lives and not be any benefit for the communities it was intended to help. Please do not waste any more tax dollars rehashing failed initiatives that have been proven time and time again to not be the correct course of action. Will this be included in the final DEIR? If not, why not?</p>

“The City’s General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for the establishment of effective mobility networks to effectively move workers and residents. Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network.”

This can be done with alternative options. Per CEQA reasonable alternatives must be considered and Mass Transportation/Transit, walking and cycling are alternatives that would meet the City’s General Plan Land Use Element, why was this not discussed? Will it be? If not, why not?

Page 107/432

“3.3.1 Proposed Roadway

The City of San Diego’s Street Design Manual (2002) contains guidelines for the physical design of roadways. The guidelines consider the needs of all users of the public right-of-way. The manual includes provisions for street trees and traffic calming, offers pedestrian design guidelines, and discusses how to create streets that are important public places. The proposed project has been conceptually designed to be consistent with the Street Design Manual.”

Considering all users of the public right-of-way would be considering the resident of Abbotts Hill and Civita, both in opposition to the connection because it would put major artery traffic in a residential neighborhood destroying the characteristics of the walkable community they bought into. Over the years Serra Mesa has put in many traffic calming measures such as narrowing the road on Mission Center Road and Murry Ridge Road, this CPA would completely undo the measures recently put in place to calm traffic and would directly increase traffic as a result. Explain how this CPA meets the guidelines of roadways given this information. Phyllis Place and the Park overlooking CIVITA is an important public place and needs to be considered as such.

“A major street is defined by the manual as: A street that primarily provides a network connecting vehicles and transit to other major streets and primary arterials, and to the freeway system, and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement.

The proposed roadway would be 460 feet long and classified as a four-lane major street...

λ Design speed: 55 miles per hour”

The major street in this CPA will be connected to 2 lane residential roads in direct contracts to how major streets are defined. There is no commercial or industrial property to carry the heavy traffic from this road to, therefore it is inappropriate to make a major street just to access a freeway system that is already at max capacity. This CPA is in direct conflict with the Mission Valley Plan that states “*Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.*” The Street connection is not included in Mission Valley Facilities Financing Plan and would be contrary to the plan by connecting a road to major arterials through residential neighborhoods of CIVITA and affecting the residential road of Phyllis Place zoned for low density residential housing. The proposed CPA is at the expense of significant impact. The traffic can be mitigated by investing in infrastructure that is currently inadequate such as onramps to 8, 163 and 15 freeways as 805 is already heavily impacted without the possibility of resolve, limited by canyons not allowing expansion. Phyllis Place cannot handle traffic increasing to overcapacity which will occur with

↑ approval of CPA. Phyllis Place will instantly become an LOS of F as soon as the road connection is made, how is this consistent with the Mission Valley Community Plan? How does LOS: F increase circulation and efficiency? Explain how it is responsible to support an CPA that will cripple the local neighborhood.

DD-111
(cont'd) The CIVITA site was only allowed to be built with higher density because of its proximity to mass transportation/transit. The CIVITA cite is approved to be built with or without the connection as it is not dependent on the proposed CPA. Adding the connection would endanger the residence of CIVITA and contradict the bases for its allowed density. The people of CIVITA do not want this connection and want what they bought into "A walking and cycling friendly neighborhood." The proposed CPA undermines the availability of Mass Transportation/Transit and relies on vehicular traffic to provide access to CIVITA rather than safe paths for walking and cycling.

DD-112 It is required by CEQA that this alternative be explored and required to prove if any of the objectives are met in doing so. If due diligence was done the alternative of amending the Mission Valley Plan to not include the connection would be superior based on the analysis of DEIR in the appendix. This alternative needs explored further to be in compliance. Will it be, if not why not?

DD-113 The proposed CPA has more negative impacts than in the original Quarry Falls EIR. The proposed connection was not approved in the Quarry Falls EIR because of negative environmental impacts and with increased impacts should continue to not be approved. The proposed CPA is not in the best interest of the communities it impacts and therefore should be denied. Why would the DEIR to amend the Serra Mesa Community Plan be supported when the eventual road connections EIRs have been denied over and over because they have not proven beneficial? Does this prove that the connection should be denied based on the road connection being denied for negative impacts in the past? Why amend a plan to include a connection that has been proven negative many times in the past and is even worse now? Will the connection lower Development Impact Fees for new developments and businesses in Mission Valley? Will the approved CPA decrease money that could be used to update existing infrastructures? Does this project give businesses a way out of paying for impacts caused by increased traffic from their businesses and developments? Will needed repairs to other infrastructure such as 8, 163, and 15 onramps be postponed or not funded as a result of this connection?

If the city finds that the street connection has significant impacts will it still be implemented? Will the community plan in Serra Mesa and Mission Valley both need amended again because the road connection is found not safe when studied again (as been found in the past) and will not help circulation and traffic?

DD-114 Who will fund the construction of the road project?
Who will fund the mitigations?
What is the total cost of the road construction and the mitigations?

- ↑
- DD-114 (cont'd) | How will the money be spent if it is not spent on this project?
- | Will more taxes be collected to pay for this project?
- | What other projects will not be done if the proposed project is funded instead?
- DD-115 | **The impacts that have been studied show significant unavoidable impacts. If a Site Development Permit were requested, would it be denied? If so would amending the Mission Valley Plan to remove the connection be best for both communities to achieve consistency? The CIVITA developer has publicly stated that if the connection were approved Sudberry Properties would fund and pay for the road to be implemented. This is contradictory to the statement that there is “no forthcoming specific proposal to build the road” will this be corrected? If not why not?**
- DD-116 | “To analyze consistency with City of San Diego (City) planning documents and policies, research into each applicable plan and policy was conducted, including the City of San Diego General Plan (City of San Diego 2008, 2010a), Serra Mesa Community Plan (City of San Diego 2011a), Mission Valley Community Plan (City of San Diego 2013a), and the City of San Diego Bicycle Master Plan (City of San Diego 2013). Analysis included a review of all elements in each plan.” **The City’s General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for** “the establishment of effective mobility networks to effectively move workers and residents... Result in less congestion and improved circulation...Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network.”
- | **The walking and bicycle paths that are in the existing CIVITA plan and Kaplan Drive connect the two communities of Serra Mesa and Mission Valley and will achieve this mobility element and encourage intercommunity connectivity; much more than vehicular roadways being primarily used by other communities as access to freeways and not to participate in community activities in adjacent communities. Please explain why this is not included in the DEIR?**
- DD-117 | **Currently the CPA is located in a Low-Density Residential. Is Low-Density Residential considered an Urban setting? There is only one road entering and exiting an entire community not able to support city traffic is this Urban? If not please address the contradiction with the statement in DEIR that agrees with the actual land use for the proposed CPA of a low-density residential area. Will it be changed?**
- DD-118 | **The City of San Diego General Plan is periodically revised and could be revised again to not include the connection as it endangers residents and does not relieve traffic congestion as intended. Is the proposed connection on the map in the General Plan? If not, does this mean the Mission Valley Plan contradicts all other plans and should be changed? This connection has caused contention for decades and it would be nice to no longer waste any more time and money rehashing failed initiatives. Please spend the money and time of the City Council correcting problems that already exist instead of creating new problems.**
- DD-119 | √ “Land Use and Community Planning Element: The purpose of this element is to guide future growth and development into a sustainable citywide development pattern while maintaining or enhancing quality of life.”

DD-119 ↑
(cont'd) **The purpose of the General plan is to enhance quality of life and this connection will not enhance quality of life for the Serra Mesa Community or any others. Why was quality of life not discussed as it pertains to the purpose of the General Plan?**

“Mobility Element: This element strives to improve mobility in the City by providing policies that support a balanced, multimodal transportation network while minimizing environmental and neighborhood impacts. The element contains policies that help make walking more viable for short trips, and addresses various other transportation choices in a manner that strengthens the City of Villages land use vision and helps to achieve a sustainable environment.”

DD-120 **The general plan strives to minimize environmental and neighborhood impact, in order to be complaint with this element the road connection must be denied. As the connection has serious environmental impacts and those would be lessened by the No Project Alternative. The city’s General Plan also strives to make walking more viable which is in support of the trail only through the Park south of Phyllis Place. To strengthen the City Village of Serra Mesa and CIVITA the road must not be connected and trails should be the focus to achieve a sustainable environment. Why is this aspect of the general plan not discussed in the section of comparing Plans? Will it be discussed?**

Page 57/317 “City of San Diego Bicycle Master Plan

Although not identified in the Bicycle Master Plan, the proposed CPA would allow bicycle lanes in either direction, connecting the Serra Mesa Community to the Civita mixed-use site via bicycle. This inclusion of bicycle infrastructure supports goals and policies presented in the Bicycle Master Plan.”

DD-121 **The previous PEIR stated that this CPA was not in the Bicycle Master Plan, is it now in the Bicycle Master Plan? Why was the trail through the Phyllis Place Park not addressed in relating to the Bike Master Plan? The current plan of a trail is stated to be a good idea and would be better without vehicular traffic per the Mission Valley Plan on page 40 “4.4 BICYCLE NEEDS...Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike.”**

Further proof in DEIR and in Appendix C “Another alternative for consideration involves a pedestrian and bicycle only path should there be no public road connection via Franklin Ridge Road to Phyllis Place. Were there not to be a roadway connection there would at least be some public pedestrian and bicycle path system for those users to get between the two communities even if vehicles could not make that connection.”

Was the current plan included in the DEIR as it would need to be in order to be in compliance with CEQA? Will this information be added? If not, why not?

DD-122 “The CPA area is designated as Low-Density Residential in the Serra Mesa Community Plan (City of San Diego 2011a)

The Quarry Falls Specific Plan’s land use design and circulation plan does not include a road connection north to Phyllis Place.” ↓

DD-122
(cont'd)

↑
If there is no plan to include the road connection in Quarry Falls Specific Plan why would Serra Mesa's Plan need changed to meet a plan that does not exist? Seems faulty that the basis of this DEIR is to create consistency and the more plans that are included the less consistent the proposed project becomes. Will the proposed CPA be withdrawn and not be brought up again? How can it be ensured that it will not be brought up again?

DD-123

"The Mission Valley Community Plan recommends providing a street connection between Friars Road and Phyllis Place, and although such a connection is currently not in the Serra Mesa Community Plan, the proposed CPA would resolve the conflict between the two community plans."

The Mission Valley plan only recommends a street connection yet does not require a connection. After research in this DEIR has found the connection to have significant impact to traffic, will the recommendation of the connection be taken out of the Mission Valley Plan as it is now in a Plan Update?

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Page 134/432

"5.1.3 Significance Determination Thresholds

2. Result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located."

DD-124

The proposed project would be in conflict with the recommendation of the current community plan as the propose CPA is suitable for low-density not Industrial and high-density traffic. Will this be addressed in the DEIR? If not why not?

"The Serra Mesa Community Plan has designated the south side of Phyllis Place as land suitable for low-density residential; however, a key concern is preserving the integrity of the single family neighborhood to the west."

Civita already includes a park with trails so there will already be another point for ingress and egress and it will already be safe, balanced and efficient. Please remove that the road connection will do this when it is already happening without the need of the road connection and it will not happen with the road connection. 35,000 cars a day will not be safe, balanced or efficient as it will cause delays of 31-43 minutes. Please explain how the connection is safer, balanced or efficient compared to the No Project Alternative?

DD-125

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A 43 minute delays is not efficient, heavy traffic on a road is not safe and one main road that is not metered or calmed is not balanced for Serra Mesa or Civita residence in Mission Valley. Most of the traffic would not be from or going to Serra Mesa, the traffic would not be balanced if most of the traffic would be from Mission Valley. Please explain conclusion why a major artery road fits into a residential neighborhood.

DD-126 Why was it not mentioned that the current plan already meets the goals of the General Plan without vehicular traffic which would be even safer than the proposed project? The No Project Alternative meets the General Plan goals with far less environmental impact than the proposed CPA. The two communities have multiple linkages already existing for example Mission Center Road and Mission Village Drive both connecting Mission Valley to Serra Mesa the distance separating the two roads is approximately 2.2 miles taking approximately 6 minutes. In conclusion it is no more than 1.1 miles or 3 minutes to get to either road in Mission Valley as the plan is now and adding another road that is 0.7 miles from Mission Center Road will not increase the compliance with the City's General Plan because it is already compliant. Contrary to the DEIR, not making the connection proposed would integrate better in the General Plan; allowing traffic calming measures by increasing mass transportation as the best option for traveling in and out of Mission Valley. Use of transit would decrease the traffic congestion and increasing safety for all pedestrians and cyclists by taking more vehicles off the road. Please discuss if these statements are correct or incorrect and why? Please include in final DEIR if correct to be in compliance with CEQA.

DD-127 "Overall, as shown in the consistency tables provided, the proposed CPA would implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan, the Serra Mesa Community Plan, and the Mission Valley Community Plan."

DD-127 The proposed CPA would not uphold goals policies and guidelines of Serra Mesa plan as the CPA is not in the Serra Mesa Plan and it would not improve Serra Mesa transportation or uphold safety of roads suitable for low-density housing to the west, Will this be added? The quotes from the General Plan, Serra Mesa Community Plan and the Mission Valley Community Plan all support the No Project Alternative, will this be mentioned in the DEIR. Please include the evidence that does not support the proposed CPA as it is required to be in compliance with CEQA.

DD-128 Page 134/432

DD-128 "5.1.3 Significance Determination Thresholds

DD-128 4. Physically divide an established community"

DD-128 Community on west side of proposed CPA would have 43 min delays to get into east side of Serra Mesa which would divide the existing community. CIVITA has many walking trails and activities throughout the neighborhood and this connection would make the 2 lane roads in CIVITA that do not have crosswalks up and down them, unpassable for the community to safely travel across on foot or bicycle. Will this be included in #4 as proof that the road connection will divide an established community? If not, why not?

DD-129 The following pages are comparisons of the Serra Mesa Community Plan, the Mission Valley Community Plan and the San Diego General Plan. The detailed analysis of each plan shows significant contradictions of the proposed road connection in all Plans including the General and how the No Project Alternatives superior. This include this information in the final DEIR showing the Superiority of the current plan (No Project Alternative) over the proposed plan:

Serra Mesa Plan: the following are quotes from the Serra Mesa Plan found at

<https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/serramesa/pdf/serramesa042611c.pdf>

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page 18 “RETAIN THE RESIDENTIAL CHARACTER OF SERRA MESA.

Goals Serra Mesa Plan

TO DEVELOP PEDESTRIAN AND BICYCLE LINKAGES CONNECTING OPEN SPACE, NEIGHBORHOOD AND COMMUNITY PARKS, SCHOOLS AND SHOPPING FACILITIES.”

The Serra Mesa Plan does not say a road connection must be made only that there should be pedestrian and bicycle access which is either already currently existing on Kaplan Drive or will exist through the park on the South side of Phyllis Place. Explain how the proposed CPA is an improvement to the current plan?

page 31 “EXISTING CONDITIONS Street System

Collector Streets are typically two to four lanes wide. They function as feeders of traffic to the major street system and provide continuity with local streets.”

Collector Streets are not just a way to get out in or out of the community by getting to a freeway faster. Why is it not mentioned that the propose CPA contradicts the Serra Mesa Community Plan in more than one way?

“An equally important function is that of providing access to abutting property. Local Streets serve adjacent land uses. They may be two-lane minor streets or one-lane alleys.”

Phyllis Place is a collector street and is not classified as a major street, why was it classified as such in the DEIR. The capacity of a collector street is 8,000 cars per day and the proposed connection will increase traffic to nearly 35,000 cars per day, which would not be supported by a collector street that serves a residential neighborhood. Phyllis Place is not meant as a major road to access the freeways but to provide access to a community. Will the inconsistency of the road classification be revised in the DEIR to represent accurate roadways and capacities? If not, why not?

“Efficiency of the primary arterial-major street network in the community varies considerably. Friars Road and Aero Drive function smoothly most of the time because there are few intersecting streets and virtually no driveways.”

This would not be the case of Franklin ridge road as it is in a densely packed residential area and would have many intersecting streets and driveways. Slowing the traffic considerably and negatively impacting

DD-133 | the residents that live there. Will this be considered in making a determination about traffic congestion?
(cont'd) | If not, why not?

“Transit

An element of the transportation network destined to become more important as pressure mounts to relieve traffic congestion conserve energy and to improve air quality, is the public transit system.”

DD-134 | **Transit systems should be used instead of impacting the road system further as stated in multiple Plans. Increasing Transit options should be considered an acceptable alternative as that is the basis that the CIVITA community was approved on. Why was increasing mass transit not considered an alternative? Can it be considered? What are the impacts of increasing mass transportation/transit? Would mass transportation/transit meet and be congruent with all the Plans? Please discuss.**

“Bicycle, Pedestrian and Equestrian Trails

Non-motorized forms of transportation have achieved great popularity in recent years in response to increased concerns over personal and environmental health. The result has been a boom in bicycling, walking, jogging and horseback riding. Although these activities are oriented to both transportation and recreation, trails are a part of the circulation system. An important issue in the community is the establishment of an adequate bicycle route plan. Major bicycle generators include the six public elementary schools, St. Columbia Parochial School, Taft and Montgomery Junior Highs, Kearny Senior High, the library and the community park and recreation center. Problems confronting bicyclists are: (1) steep roads leading out of the community, (2) on-street parking along designated route lines and (3) general traffic.” 43/77 (page 35).

DD-135 | **Trails are part of circulation and would meet the goals of the community and the city and the project objectives without the problems of traffic. Why was this not considered in coming to a conclusion on the superior option? Would a trail rather than a vehicular traffic road be a safer route for school children to get to travel within the community?**

“However, few walkways intended solely for pedestrians exist in the study area. There is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers. Hiking trails have not been designated in the community but the regional bikeways could serve as major hiking routes. These could be linked to urbanized areas by trails through the attractive natural canyons.” 45/77 (page 37).

DD-136 | **The community plan states the need for separate pedestrian access to activity centers; the proposed CPA would not allow safe and separate access. Explain why this was not mentioned in the DEIR under the section reviewing all elements of each plan and the contradictions between them? Will it be included? If not, give reasons for the exclusion.**

DD-137 | “GOAL



DD-137 (cont'd) TO PROVIDE A SAFE, BALANCED, EFFICIENT TRANSPORTATION SYSTEM WITH MINIMAL ADVERSE ENVIRONMENTAL EFFECTS.”

The most minimal effects would be the No Project Alternative. Allow the currently paths to function as an efficient transportation system and encourage use of mass transit, walking and biking. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

“Bicycle Routes

DD-138 Three access routes should be established linking the mesa to regional bikeways serving Mission Valley and Murphy Canyon. One route should follow Mission Center Road from Murray Ridge Road to the Mission Valley bikeway. Should this route prove unfeasible, studies for an alternative route should be carried out. A second route should connect Aero Drive with the Murphy Canyon Bikeway. A third route should serve the Mission Village area. On a near term basis, a route connecting Mission Village Drive to the Mission Valley Bikeway should be investigated, possibly involving the City-owned slope easement on the west side of Mission Village Drive...Means of improving transportation linkages and lessening the impact of motorized vehicular traffic on the environment should be considered. Two possibilities are the “bicycle park-bus ride” and “piggy back” bicycle-bus transportation concepts.”

These options already in the community plan should be implemented to lessen the impact of motorized vehicular traffic on the environment. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

“Open Space

DD-139 It is possible that most valuable purpose open space serves is its affording visual and psychological relief from the dreadful tedium and tension of interminable urban development. The human spirit must surely languish when confronted daily with a continuous and confused panorama of buildings, pavements and automobiles. In that it provides a physical patterning for the metropolitan fabric, open space helps give the urbanized area and its constituent communities a desirable definition, coherence, and character, which would otherwise be lacking. In turn, individual residents are better able to identify, and be identified with, their communities. The importance of these factors, while intangible, is not to be underestimated.”

The proposed road would not allow the open space vision as stated in the community plan. The road would break up the Parks view of the Mission Valley Canyon with pavement and automobiles. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

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DD-140 Mission Valley Transportation Plan: the following are quotes from the Mission Valley Transportation Plan found at: https://www.sandiego.gov/sites/default/files/4_transportation.pdf

The five freeways that serve Mission Valley are I-5, I-8, I-15, I-805, and SR 163.”

Therefore further access to the 805 that is already accessible would be redundant. More access would only increase traffic on one of the busiest freeways in the city. Allowing access would not help the traffic

DD-140 ↑ congestion already facing the 805, it would only add to it. Explain why more connection is needed when
(cont'd) five freeways are serving Mission Valley? Explain why improving infrastructure to onramps that already exists for these freeways is not a superior option?

“4.2 TRANSIT NEEDS The City of Villages strategy supports expansion of the transit system by calling for villages, employment centers, and other higher-intensity uses to be located in areas that can be served by high quality transit services. This will allow more people to live and work within walking distance of transit. Mission Valley is relatively well-served by transit, with most of the community within a quarter mile of a transit stop. The highest public transit ridership levels in the Mission Valley community are along the San Diego Trolley Green Line, as well as to and from the Fashion Valley Transit Center. Future transit needs in Mission Valley primarily stem from access limitations due to transit network gaps or poor services in terms of on-time performance, safety issues near transit stations, and connectivity issues.”

DD-141 This is a direct quote from the Mission Valley Plan and is directly indicating that transit can be used within a quarter mile from most of the community. Why wasn't increasing transit or improving transit considered an alternative in compliance with CEQA and as it is a cornerstone in both Serra Mesa and Mission Valleys Community Plans? Please address this inconsistency with the conclusions of this DEIR and the written text of the two community Plans that are also in agreement with the City of San Diego's General Plan and the Bike Master Plan? Transit is the system designed to take cars off the road. Fixing the issues with transit gaps would improve traffic circulation and congestion and would meet objectives more efficiently than building more road connections that would further encourage vehicular traffic. Please address why this was not considered in the DEIR?

“In addition, a network gap exists near the Interstate 805 corridor, which links Mission Valley to communities to the north, such as Serra Mesa and Kearny Mesa.”

DD-142 Fix the transit network gap, don't build a road. Why is our transit not being considered an alternative to a road connection? If people could use Mass Transportation to travel then all the Plans would be met and there would be no need for the proposed CPA.

“Safety Pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles.”

DD-143 Page 38, directly from the Mission Valley Plan states ‘it is safer if pedestrians are not with vehicles’; further supporting the No Project Alternative being consistent with Mission Valley's Community Plan. Why was the road width of proposed CPA not considered when factoring impacts on pedestrians and cyclists as it is stated directly in the Mission Valley Plan? Can it be considered? If it were to be considered, would the impacts be significant? Would the No Project Alternative be superior?

DD-144 ↓ “The central portion of Mission Valley, between State Route 163 and Interstate 805, exhibits the highest number of pedestrian collisions in the community.”

DD-144
(cont'd)

From the Mission Valley Plan adding only pedestrian and cycling paths will ensure safety for pedestrians and cyclist by separating vehicles streets, why was this not considered? Will the trail through the Park south of Phyllis place be safer for pedestrians and cyclists than the proposed CPA with a street connection? Will this be considered in deciding which plan is superior? It is proven that no vehicles are preferred for safety in all Plans.

page 40 “4.4 BICYCLE NEEDS

Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike.”

DD-145

Again supporting the No Project Alternative and allowing the already planned pedestrian and bicycle path to make a safer and more comfortable condition encouraging walking and biking. Why was this not considered when analyzing the Mission Valley Plan? Was it not considered because it contradicts the proposed CPA? Please analyze impacts of proposed CPA verse pedestrians and bicyclists as it appears the existing plan/No Project Alternative including Kaplan Drive and the trail at Phyllis Place?

“Bicycle Level of Stress Bicycle Level of Traffic Stress (LTS) measures the level of comfort a cyclist would experience on a roadway, taking into account speed of traffic, presence of a physical barrier from traffic, width of bike facility, number of auto travel lanes, and intersection control. This measurement classifies streets and intersections from LTS 1 (suitable for children) through LTS 4 (suitable for riders who are comfortable sharing the road with autos traveling at 35 mph or more). In general, stress levels are high along most roadways in Mission Valley, regardless of the presence of bicycle facilities due to high traffic speeds, the high number of auto travel lanes, as well as the limited space given to the cyclists.”

DD-146

Again, solved with No Project Alternative, where all paths are without vehicles which would lower stress to pedestrians and cyclists and encourage less travel by car. Does this prove the proposed project is contrary in multiple locations of both community plans? Why were these contradictions not mentioned when the first objective is to “Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa”?

The proposed project would make both plans more inconsistent with each other and themselves. Please explain the contradiction. Changing the Mission Valley Plan to not include the connection would eliminate all the contradictions and is superior in creating plan consistency and overall better for the environment in every way. Please include in DEIR. If not, why not?

DD-147

San Diego General Plan: the following are quotes from the San Diego General Plan
<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf>

“Mobility Element of San Diego General Plan:

C. Street and Freeway System Goals

DD-147 (cont'd)	<p> ◆ A street and freeway system that balances the needs of multiple users of the public right-of-way. ◆ An interconnected street system that provides multiple linkages within and between communities. ◆ Vehicle congestion relief.” </p>
DD-148	<p> The proposed connection does not relieve the vehicle congestion as stated as a Goal in the General Plan. Encouraging mass transportation would in fact relieve congestion without the proposed road connection. ◆ Safe and efficient street design that minimizes environmental and neighborhood impacts.” The proposed connection does not allow safe and efficient street design as it will negatively impact traffic and other environmental concerns. The road connection does not minimize environmental impacts on the neighborhood of Serra Mesa. This is not a comment but a fact based on numbers in the data, please include. ◆ Well maintained streets. </p>
DD-149	<p>Discussion</p> <p>Streets and freeways comprise the framework of our transportation system and play a major role in shaping the form of the City. <u>The quality of the roadway system affects us whether we travel by automobile, transit, bicycle, or foot, and influences which mode of travel we choose.”</u></p> <p>By choosing to only support transit, bicycle or foot alternatives the city is encouraging these modes of travel. If the road connection were to be approved it would in effect be encouraging automobile traffic instead, which is not consistent with the General Plan. Please correct false statements and include counter arguments based on evidence in the data.</p>
DD-150	<p>Quoted from the San Diego General Plan</p> <p><u>“The RTP calls for efficiency improvements using system and transportation demand management strategies, transit service improvements, bicycling and walking infrastructure improvements, and support for transit-oriented design and development.</u></p> <p>A finer level of street system details may be provided at the community plan level.</p> <p>Adopted community plans specify the planned system of classified streets within the local community.</p> <p><u>Travelers benefit from shorter trips and multiple route options, and are more likely to walk or bicycle if distances are short. While vehicle congestion relief is an overall goal of the Mobility Element, the degree of acceptable vehicle congestion will vary in different locations based on the function of the roadway and the desired community character. Decisions that must balance the benefits and impacts of designing our transportation system for multiple modes of transportation will need to be made at the community plan or project level.”</u></p> <p><u>As stated in the General Plan, vehicle congestions relief is the overall Goal, travelers are more likely to walk or bicycle if distances are short such as to an adjacent community and this is to be done at the community plan project level not dictated by larger government. The desired community character is not achieved by this proposed connection as shown by the Serra Mesa Planning Group’s 10-0 vote against the connection in 2016 and another unanimous vote in May 2017 for this DEIR.</u></p>

DD-151 | “ME-C.1 b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time.

e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.” The General Plan states that public input should be increased in decision-making and public input is to reject the connection and please do not waste any more tax dollars on this issue ever again. Mission Valley Planning Group did not support the connection and Serra Mesa Planning Group strongly opposed the connection. Will public input and community group’s recommendations be considered in the approval of this DEIR? Will this issue continue to be brought up? When will the wasted tax dollars stop? Why are the community’s wishes not being heard? Will the Mission Valley Community Plan be updated to reflect no road connection to stop this government waste for an unwanted, unneeded, detrimental connection?

DD-152 | “ME-C.3 b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be designed to control traffic volumes and speeds through residential neighborhoods.”

These collector roads are specifically for routes to schools, parks, and village centers not to gain access to a major freeway that would not control traffic volumes nor speed though Serra Mesa’s or Mission Valley’s residential neighborhoods. Will the DEIR include this contradiction in the San Diego General Plan?

DD-153 | “d. Where possible, design or redesign the street network, so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.”

Allowing vehicular traffic at this propose connection site would form barriers to pedestrian traffic and community cohesiveness with increasing traffic congestion, noise and air pollution discouraging pedestrian traffic. Information in the general plan supports this as shown.

DD-154 | “5.2 Transportation/Circulation and Parking

Intersection LOS and Delay Ranges

F: Operations are at excessively high delay, considered unacceptable to most drivers. This condition often occurs when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay.”

If Phyllis Place, Via Alta and Franklin Ridge Road will become an LOS: F with the connection; how is that not considered a significant impact to the neighborhood character, safety and traffic and in conflict with all the Plans? Please justify all answers to the conclusions drawn throughout the entire DEIR, an LOS: F represents excessively high delays and it is considered unacceptable to most drivers. Therefore the proposed CPA would also be unacceptable and be in significant conflict with all Plans, General, Bike, Serra Mesa and Mission Valley.

DD-155 | “LOS Thresholds for Roadway Segments ABCDE

↓

Collector (4 lanes) 10,000 14,000 20,000 25,000 30,000

Collector (4 lanes) (no center lane)

Collector (2 lanes) (continuous left-turn lane) 5,000 7,000 10,000 13,000 15,000

Collector (2 lanes) (multifamily) 2,500 3,500 5,000 6,500 8,000

-

Table 5.2-3 Freeway Segment LOS Definitions

F >1.00 Considerable

DD-155
(cont'd)

Forced or breakdown. Delay measured in average flow, travel speed (miles per hour). Signalized segments experience delays >60.0 seconds/vehicle”

Based on evidence in Tables in Appendix C Phyllis Place, Via Alta and Franklin Ridge Road, which are currently only 2 lane collectors, would be severely overloaded with close to 35,000 cars traveling on them every day. How is it acceptable to change the classification of a 2 lane collector to a “major roadway” when Via Alta and Franklin Ridge Road will not be widened to meet the classification of a major road way? How is it acceptable to connect such major streets in residential neighborhoods when bedroom windows are within 10 feet from the road that the DEIR is classifying as a major road? Please explain justification in changing road classification without changing road widths or neighborhoods surrounding such roads?

“Existing Peak-Hour Intersection LOS

DD-156

Currently A and B rating on most roads, the proposed road would decrease most roads to D, E, and F. Explain how this improves traffic circulation and congestion? It appears it does the opposite; will the conclusions be changed to reflect the data? If not, why not?

“• I-805 North from Mesa College Drive On-Ramp to Murray Ridge Rd. LOS F (AM)

• I-805 North from Murray Ridge Rd. to I-8 LOS F (AM)

• I-805 South from Mesa College Drive On-Ramp to Murray Ridge Road LOS F (PM)”

DD-157

As shown in current DEIR, the following freeway segments do not operate at an acceptable LOS D or better. Why is it thought that introducing 25,000 cars to 805 will help traffic circulation and congestion? If a freeway segment is already an F will traffic not just back up into neighborhoods the more traffic that tries to use the 805? Please explain reasoning on how the proposed CPA will meet the proposed goal of decreased traffic congestion and improve circulation?

“Impacts are considered significant if the project would result in any of the following.

1. An increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system.
2. The addition of a substantial amount of traffic to a congested freeway interchange or ramp, or in a substantial increase in VMT for freeway mainline segments.
3. A substantial impact upon existing or planned transportation systems.
4. An increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway).”

DD-158

Yes to all of these questions. These impacts are not mitigable and are significant; LOS F is a significant impact per the City of San Diego:

“City of San Diego Traffic Impact Significance Thresholds

F (or ramp meter delays above 15 minutes) 0.005 0.5 0.01 0.5 1.0 1.0”

What is Franklin Ridge Road classified as now? What will it be classified, if the connection is made? Is Franklin Ridge Road planned to be expanded? Will there be any crosswalks added to cross the street as there is only 1 top and bottom with many houses in between. Streets carrying as much traffic as estimated should not be 10 feet from residential windows so how is this figured to be safe for the residents of CIVIA? Was proximity to houses considered in this DEIR? Will it be, explain why or why not.

DD-159

Significance of Impact

Long-Term Intersection Level of Service Analysis

- Franklin Ridge Road / Phyllis Place – LOS F (PM)
- Franklin Ridge Road from Via Alta to Civita Boulevard – LOS F
- Mission Center Road from Aquatera Drive to Murray Ridge Road – LOS F
- Phyllis Place from Franklin Ridge Road to I-805 SB ramp – LOS F
- Phyllis Place from I-805 SB Ramp to I-805 NB ramp – LOS F
- Murray Ridge Road from I-805 NB Ramp to Mission Center Road – LOS F

DD-160



DD-160
(cont'd)

- Murray Ridge Road from Mission Center Road to Pinecrest Avenue – LOS F
- Murray Ridge Road from Pinecrest Avenue to Sandrock Road – LOS F
- Rio San Diego Drive from Qualcomm Way to Rio Bonito Way – LOS F

The above is proof of many more impacted roadways with the connection than without. Explain how the DEIR is justifying using VMT to determine significance and not accounting for the speed and grade these miles are being traveled, lowering gas mileage and increasing impact to very significant. Please provide data to support VMT as being a superior method of determining significance when actual emissions are account for.

MITIGATION

“Phyllis Place from Franklin Ridge Road to I-805 SB Ramp: a. MM TRA-1: Phyllis Place from Franklin Ridge Road to I-805 SB Ramp shall be reconfigured to accommodate 5 total lanes, 3 EB and 2 WB, including a median, satisfactory to the City Engineer.”

DD-161

How does widening Phyllis Place to 5 lanes preserve the neighborhood to the west? Is there room to widen the road? Will the park be smaller? Will the Church parking lot be impacted? Will the Senior residents at City View Retirement Apartments on Phyllis Place be impacted? Currently there is no crosswalk on Phyllis Place at all; will a crosswalk be added to cross Phyllis Place if it is a 5 lane road? If not, why not?

4. Murray Ridge Road from Mission Center Road to Pinecrest Avenue: a. Murray Ridge Road from Mission Center Road Pinecrest Avenue shall be restriped consistent with a 4-lane Collector. i. Currently, Murray Ridge Road provides Class II bike facilities and on street parking. The proposed mitigation would either repurpose the existing right of way to provide four travel lanes by eliminating the bike lanes and on-street parking, or widen the roadway to accommodate four travel lanes and maintain Class II bike facilities and on-street parking. Widening the roadway would require removal of residences on both the east and west sides of Murray Ridge Road along the entire stretch of roadway segment. Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), it is not recommended, and the impact would remain significant and unavoidable.”

DD-162

This is proof that the proposed road connection will have a significant impact on neighborhoods and traffic. No plan wants this to happen because it would eliminate bike lanes, parking and homes, same effect with multiple other mitigations. Please explain, do the mitigation have to be done? Will they be done? How soon after the connection is made do they need to be done? Will the bike lanes and parking be removed or the houses on Murry Ridge Road? What will happen to traffic and the neighborhood if the mitigations are not done as conditions of the project? Who will pay for the mitigations? If the developer pays for the connection as quoted verbally on numerous occasions will the developer also pay for the mitigations? Which mitigations will the developer pay for? If there is no money in the city budget for mitigations and the connection is put in by the developer when and how will the mitigations be completed? What will the impacts be to Serra Mesa? No mitigations are required in the Quarry Falls CPA. Do the tax payers pay for the mitigations?

“IMPACTS Would the proposed project result in a substantial impact upon existing or planned transportation systems?

DD-163

The following should be added in support of the No Project Alternative. The connection will not be more efficient. The study concluded the proposed CPA would not reduce traffic congestion especially at the community level and the area would not have improved access based on the overwhelming negatives to existing street connections and predicted traffic flows. The Phyllis Place neighborhood is the only area that would have another road access not the entire Serra Mesa area as Mission Center road is an easy right turn, which the majority of Serra Mesa would have to pass by in order to go all the way down to Franklin Ridge Road. Most residents would take the shortest route from their house which would still be Mission Center Road, therefore the majority of the community would not benefit. Traffic from Mission Valley would have another access point to the 805 that would make more congestion and increase traffic to Serra Mesa by over 25,000 cars per the traffic study. Therefore on the community level this would not improve access in the area and would do the opposite of adding a 43 minute delays to a freeway that currently serves the community with less than 15 minutes of delay and is projected to do so through the year 2035.

DD-164

Phyllis place does not have any problems currently and functions well to serve the low-density housing it supplies. Phyllis Place already has access to necessary emergency access points and has no need for the connection making the impact more than significant, not less. Phyllis Place is the only entrance and exit for the entire community west of Phyllis place, unable to support the proposed connection due to the density of traffic that will block residence west of Phyllis Place. The connection may be used to access 805 by immediate residents of the area but it will also serve as a major artery for the entire Mission Valley East, Mission City, North Park and University Heights between Mission Center Road and Mission Village drive to have direct access to 805 creating a bottle neck on Phyllis Place, a solitary exit road for residential houses. Texas is a major artery turning into Qualcomm Way into Franklin Ridge Road allowing direct access to 805N and 805S which will significantly impact the traffic and circulation in the Low-Density Residential area with only one road. As it is now traffic can go on the 8, 15, 163 and get to the 5, along with many other large surface streets such as Friars Road. All these road connections meter traffic and allows for multiple options for travel. If the connection is approved the road will be a direct road to access the 805, eliminating traffic calming and metering prior to the bottle neck of the 805 during rush hours. There are currently not problems in the proposed amendment area and the traffic runs very efficiently. Explain and give proof with data how the proposed project will provide a more efficient, integrated circulation network? How will it reduces traffic congestion at the community level and improve access in the area? Explain how traffic calming works with VMT. Does VMT matter if the shortest distance is through a residential area? Does VMT take into consideration the size and location of the shortest distance and the traffic implications of the shortest way?

DD-165

The majority of Serra Mesa lives closer to Mission Center Road, driving further to get to Phyllis place would be less convenient than it is currently. The transit system will not be any closer to Serra Mesa with this connection and the planned trail linking the two communities would provide better access to transit than vehicular traffic. Study the benefits of not approving the proposed CPA as required by CEQA. Was the proposed trail and the pedestrian and bicycle access taken into account in coming to this conclusion? Would the current access provide safer access to transit? Would the current access encourage more users of transit as stated in the Mission Valley Plan and the General Plan?

DD-166 | **The connection would not be efficient. Based on the LOS being an F and the delays at the onramps going from acceptable to 43 minute delays, will this statement be added? If not why not?**

DD-167 | **The proposed connection would increase community congestion; there is already emergency access points and linkage for handicap, pedestrians and bicyclists. Would the proposed CPA add a bike lane or replace the planned safe path with one heavily impacted with 35,000 cars? Explain how this information is incorporated in the conclusion stating ‘relieved congestion’? Impacts are found to be significant and the text of this document should correlate with the data.**

DD-168 | **Where are the facts to justify the road connection would be more efficient and reduce traffic congestion, at the community level? There is supporting evidence that traffic congestion would be increased and less efficient. The connection would not reduce traffic congestion at a community level when there is not traffic congestion on Phyllis Place and widening it to 5 lanes would not preserve the neighborhood to the west. Stating that the proposed connection would provide benefits, when benefits already currently exist is inappropriate and incorrect.**

Page 177/432

“Would the proposed project result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway)?”

DD-169 | **A road would increase traffic and decrease walkability creating potentially hazardous conditions to the public. Documented in the Mission Valley Plan and the General Plan, proximity to vehicles decrease safety and more accident have occurred on roadways with traffic than without; 35,000 cars would undeniably increase hazards significantly. Will this statement be added? If not, why not, please provide facts and data to support conclusions.**

Page 209/432

“Issue: Would the project substantially alter present circulation movements including effects on existing public access to beaches, parks, or other open space areas?”

DD-170 | **Community Access** The traffic study evaluated effects that the potential road connection would have on emergency access, evacuation access to social, educational resources, and commercial shopping as well as the service needs of the affected communities on either side of the potential connection. To understand community access, the traffic study measured two reference points to and from which the relative access times could be measured for both the with road connection and without road connection scenarios. The analysis looked at access to hospitals, fire and emergency medical services, educational facilities, parks, libraries, community centers, and other recreational facilities. Refer to Chapter 8 of the traffic study (Appendix C to the DEIR) for a full discussion of how this analysis was conducted. The times to each facility was averaged for the two reference points and are presented in Table 5.2-23, Community Access Travel Times.



Table 5.2-23 Community Access Travel Times

Facility Type Representative Accessibility Time Traveled (min.) Without Connection With Connection

Hospitals 39 31

Fire departments 42 32

Schools 153 135

Libraries 40 32

Shopping centers 69 57

Parks 58 50

As the table demonstrates, accessibility to a variety of public amenities increases with the road connection.”

Where are these numbers from? They do not make since, how would it be any faster to get to services when the services are contained within the community and the proposed road is not near any services? What services take that long to get to? Why was this studied the way it was? How were the two points chosen? Why are the times averaged? People go to the hospital or school closest to them, so why is it important to average the time it would take to get to 4 different schools or four different hospitals. This analysis is not rational and needs to be completed in a more concrete way. Will statements based on faulty data be removed? A person could crawl to a hospital or school in the time this table estimates it would take to drive with or without the road, please explain. Response times for emergency vehicles are stated to be between 5-7 minutes for all location in Mission Valley and Serra Mesa which is within normal limits, the connection is not needed in order to be compliant. How does this chart prove anything? Will it be removed, if not why not?

Page 210/432

“Emergency evacuation and routing were also considered in the traffic study. The analysis found that currently there is only one route of access to the more than 200 homes in Serra Mesa at the western end of Phyllis Place on the north rim of Mission Valley. This public access route is via Phyllis Place leading to I-805 or further to the east and continuing on surface streets like Murray Ridge Road. Also, Phyllis Place is constructed as a two-lane collector street having a nominal (i.e., policy based rather than actual) capacity of 8,000 vehicles per day.”

*****Therefore, the traffic study concluded there was limited additional benefit to these more than 200 homes for evacuation by having a road connection.”**

***** This statement from the DEIR proves that emergency evacuation had limited benefit to the over 200 homes near the connection. Please include this as the conclusion supporting that the proposed CPA is not superior to the No Project Alternative. Will conclusions drawn be adapted to include this information based on the facts? If not, why not?**

148/432

DD-172 | “Policy UD-C.7 Enhance the public streetscape for greater walkability and neighborhood aesthetics.

The proposed project would include a street connection to encourage greater walkability. Additionally, the implementation of the proposed project would provide additional ingress and egress to the adjacent Quarry Falls site, which would improve circulation in the immediate area and provide greater access throughout.”

False, where is the proof of this statement? How would more traffic encourage walkability when it would be replacing a trail without traffic? How would more traffic that is not local improve circulation in the immediate area and provide greater access throughout? Please remove in all places or justify with facts (which do not exist, remove ‘greater walkability’, that road connection would ‘encourage walking’).

DD-173 | Page 210/432

“Construction of the roadway would provide additional ingress and egress off Phyllis Place and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley that would improve access in the area. Furthermore, the project would provide an additional link for pedestrians and cyclists. It would also link those using vehicles within Serra Mesa to the Quarry Falls site and the greater Mission Valley community, providing access to community parks and making transit services more readily available”

Prove this statement or take it out. There will be no parking on the road for the community park if the proposed road is created, decreasing the access to the Park. How does a road for vehicles make transit more easily available? People who use transit are pedestrians and cyclists and the current plan of a safe trail without cars is being replaced with cars. Wouldn't this decrease patronage of transit and the park? There is already 2 vehicular links between the two communities and adding another would not increase access to community parks nor make transit services more available. The transit services are off Mission Center Road not off proposed road connection, so transit would not be more readily available. Also the transit stops do not allow parking so having vehicular access is not helpful if there is nowhere to park. Adding more avenues for vehicles without providing parking for those vehicles at community parks and transit will not provide access. The increase in vehicles will however negatively affect the pedestrians and cyclists that could use the community parks and transit by splitting a park in half with 4 lanes of traffic in the middle of the park, by increasing traffic by 25,000 cars where there is a safe walking and cycling only path as it currently is. Please explain reasoning and remove false statements.

DD-174 | “5.2.13 Significance of Impact

The project would not substantially alter present circulation movements, including effects on existing public access to beaches, parks, or other open space areas.”

How would significant delays of 43 min not alter present circulation movement to beaches parks or other open spaces? Please correct false statement.

DD-175 | Page 211/432

“5.2.8 Impact Analysis Issue

↓

6: Alternative Transportation Would the proposal result in a conflict with adopted policies, plans, or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?”

Yes, it would encourage use of vehicles, conflicting with adopted policies. It is safer to walk and bicycle without vehicular traffic as stated in the Mission Valley Plan and the General Plan. Will this be added? If not, why not? All the statements made that the proposed road connection will be less than significant in terms of alternative transportation is incorrect and must be removed. All of the rational is based on false data as the connection at Kaplan Drive and Aperture Circle and the trail that is already in the plan going through the Phyllis Place Park has not been considered. Once considered all conclusions that the road connection would help pedestrians or cyclist or that it fits into the General Plan or Master Bike Plan is false and must be removed. As the access is better as it is currently existing then with proposed connection.

Page 211/432

“BIKE LANES

The proposed project would therefore increase bicycle network connectivity between the Serra Mesa and Mission Valley communities and thus would not conflict with overarching goals and policies of transit plans to provide balanced and safe bicycle networks within and between communities.”

False bicycle access is already in the plan so the connection will not provide additional access. A bike path without vehicular traffic is currently planned which is better for pedestrians and cyclist and would improve connectivity. Explain why the bike path going through the park on Phyllis Place, connecting the communities was not used in coming to conclusions this DEIR? Correct the inaccuracy that it would ‘improve’ connectivity for cyclists because vehicular traffic would do the opposite and there will already be a path so this connection would not ‘increase’ connectivity.

“Pedestrian Facilities

The proposed project would therefore increase pedestrian connectivity between communities.”

False, there is already a walking connection to Mission Valley and access on Mission Center Road and Mission Village Drive, the majority of Serra Mesa is closer to those roads than the proposed road. The over 200 houses close to the connection can easily walk or bike with existing connections on Kaplan Drive and Aperture Circle including handicap ramps or the trails that are at the proposed connection site without traffic and do not need an additional road for access. Please remove sentence as “increase” has not been proven and the traffic study proves otherwise. Will the statement be corrected or removed in all places? If not, why not?

Page 231/432

“Carbon Monoxide Hotspots

The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor.”

Phyllis Place will be an LOS F after the connection, why wasn't it studied? Will it be? If not why not? The apartments at city view church are senior residence, which are sensitive receptors, why were these homes not considered? Will they be studied as is required by CEQA? If not why not? The proposed CPA should be denied because it does not show a significant reduction in traffic or congestion relief and does not study environmental impacts such as this because the objectives were not accurately describing the underlying goal as required by CEQA. Will the conclusions be rewritten to state the No Project Alternative is superior? If not why not based on the overwhelming evidence to support the No Project Alternative?

-

How are the conditions from LOS: ABC without connection to LOS: EF with connection found not to be significant?

Table Long-Term Without and With Connection Analysis (CO hotspots)

Key Intersection Time Period Existing Condition Long Term With Connection Mitigation Feasible? Within 400 feet of Sensitive Receptor? Requires CO Hotspot Analysis?

Murray Ridge Road and Sandrock Road	PM	B E No Yes Yes
Murray Ridge Road and I-805 NB ramp	PM	A F Yes Yes Yes
Murray Ridge Road and I-805 SB ramp	AM PM	B E Yes No No B F Yes No No
Qualcomm Way and Friars Road EB ramp	PM	B E Yes Yes Yes
Qualcomm Way and Friars Road WB ramp	AM PM	C E Yes NA No
Qualcomm Way and Rio San Diego Drive	PM	C F No Yes Yes
Via Alta and Franklin Ridge Road	PM	NA F Yes NA No

*****Via Alta and Franklin Ridge Road at will be LOS F. The proposed road would result in an LOS F which means it is not deteriorating to an F but will start as an F. Proof to why it should not be superior. None of these key intersections would improve at all, only get worse from ABC to only Es and Fs.*****

Explain how the worsening of the air quality would not prove the No Project Alternative to be superior? Is it not significant to have almost all intersection go from as LOS of ABC's to E's and F's with the connection? How can the proposed CPA be considered based on this overwhelming evidence to the contrary?

“Cumulative Impacts Found to be Significant Transportation/Circulation and Parking

Long-Term Intersection Level of Service Analysis

The long-term intersection analysis shows existing conditions compared to the long-term conditions with the road connection. With the road connection, the following intersections do not operate at an acceptable LOS:

- Friars Road / Northside Drive – LOS E (PM)
- Qualcomm Way / Friars Road WB ramp – LOS E (PM)
- Qualcomm Way / Friars Road EB ramp – LOS E (PM)
- Murray Ridge Road / I-805 NB ramp – LOS F (PM)
- Murray Ridge Road / I-805 SB ramp – LOS E (AM)
- Murray Ridge Road / I-805 SB ramp – LOS F (PM)
- Murray Ridge Road / Sandrock Road – LOS E (PM)
- Franklin Ridge Road / Phyllis Place – LOS F (PM)
- Franklin Ridge Road / Via Alta – LOS F (AM/PM).

-

Long-Term Freeway Mainline Analysis

The long-term With Connection Freeway Mainline Analysis shows existing conditions compared to the long-term conditions with the road connection. With the road connection, the same freeway segments do not operate at an acceptable LOS D or better:

- I-805 NB from SR-163 to Mesa College Dr On-Ramp – LOS F (AM)
- I-805 NB from Mesa College Dr On-Ramp to Murray Ridge Rd – LOS F (AM)
- I-805 NB from Murray Ridge Rd to I-8 – LOS F (AM)
- I-805 SB from SR-163 to Mesa College Dr On-Ramp – LOS F (PM)
- I-805 SB from Mesa College Dr On-Ramp to Murray Ridge Rd – LOS F (PM)
- I-805 SB from Murray Ridge Rd to I-8 – LOS F (PM)

Long-Term With Connection Freeway Ramp Meter Analysis shows the existing conditions are compared to the long-term conditions with the road connection. Ramp meter analysis was conducted at I-805 SB and NB ramps at Murray Ridge Road. The most restrictive ramp meter rates were provided by Caltrans. With the road connection, all ramps also operate with less than 15 minutes of delay except:

• I-805 NB ramp at Murray Ridge Road – 43 minutes of delay (PM)

• I-805 SB ramp at Murray Ridge Road – 31 minutes of delay (PM).

-

Based on the City's significance thresholds outlined in Table 5.2-9, City of San Diego Traffic Impact Significance Thresholds, several intersections, roadway segments, freeway ramp meters, and freeway mainline segments have been determined to result in significant cumulative impacts. Summary of impacts:

-

Long-term Impacts with Road Connection Number Impact Location Cumulative Segment Impacts

1 Phyllis Place from Franklin Ridge Road to I-805 SB ramp

2 Phyllis Place from I-805 SB ramp to I-805 NB ramp

3 Murray Ridge Road from I-805 NB ramp to Mission Center Road

4 Murray Ridge Road from Mission Center Road to Pinecrest Avenue

5 Murray Ridge Road from Pinecrest Avenue to Sandrock Road

6 Mission Center Road from Aquatera Drive to Murray Ridge Road

7 Rio San Diego Drive from Qualcomm Way to Rio Bonito Way

8 Friars Road / Northside Drive

9 Murray Ridge / Sandrock Road

10 Murray Ridge Road / I-805 NB ramp

11 Murray Ridge Road / I-805 SB ramp

12 Qualcomm Way / Friars Road WB ramp

13 Qualcomm Way / Friars Road EB ramp

14 Via Alta/Franklin Ridge Road Cumulative Freeway Ramp Meter Impacts

15 I-805 NB ramp at Murray Ridge Road

16 I-805 SB ramp at Murray Ridge Road Cumulative Freeway Mainline Segment Impacts

17 I-805 from SR-163 to Mesa College Dr

18 I-805 from Mesa College Dr to Murray Ridge Rd

DD-180
(cont'd)

19 I-805 Murray Ridge Rd to I-8”

DD-180
(cont'd)

How do all of these significant impacts make the proposed project feasible? Do these impacts mean anything? There will be extreme delays impacting the community that would not exist without the connection. This proves that the proposed CPA will not meet the objectives in relieving traffic congestion or improve circulation. Please revise all contradictory statements as the No Project Alternative is superior in every way not just slightly.

DD-181

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.”
DEIR 38-42/432

In light of the mitigations not showing significant improvement to the impacts why is the proposed project still being considered to the No Project Alternative?

Page 393/432

“7.6 POPULATION AND HOUSING

Issue 1: Would the proposed project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?”

DD-182

The proposed project may not induce population growth but is proposed due to Mission Valley’s population growth. The proposed connection would make future development easier to build and could lower impact fees for businesses in the area which in turn will induce substantial population growth in the area. Please correct statements in the DEIR. The connection would increase density/intensity beyond the community plan of Serra Mesa, why was this not covered in the analysis? Will it be included? If not, why not?

Page 394/432

“Issue 2: Would the proposed project displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?”

DD-183

The proposed project would substantially alter the planned location, distribution and density of both areas. Without the connection the location, distribution and density would be approved in other areas instead, why was this not addressed? The question was not answered in the response given in the DEIR, please answer the question asked. The connection is not in the Serra Mesa plan therefore would alter the current plan. How would the connection alter the distribution and density of the Serra Mesa’s current Low-Density Residential streets such as Phyllis Place? Would residents of the Low-Density Residential area to the west be impacted with the increase in density and distribution of the increasing Mission Valley population? What about the people and homes on Murry Ridge Road that would be removed in the mitigation, why were these houses not considered, will they be? If not, why not?

“Issue 3: Would the proposed project include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments?”

DD-184 **First off in the revised DEIR Issue 2 was repeated and Issue 3 from the PEIR is as quoted above, will this Issue be added back into the Final EIR? If not why not? Why was it removed? The propose project would require other infrastructure not assumed in the community plan of Serra Mesa and would add to the Capital Improvements Project lists as proved by the mitigation required to complete the project. All 3 of these issues were not addressed in the responses provided; please clarify the costs of infrastructure not assumed in the Community Plan and the adopted Capital Improvements. If the CPA is approved the road will be connected as a result and the cost and future developments will be affected and need to be considered. Will they be considered? If not, why not?**

“The CPA area is currently designated residential in the Serra Mesa General Plan and zoned for Low-Density Residential use (City of San Diego 2011a)... Finally, no displacement of existing housing would result with future implementation of the CPA. Overall, population and housing impacts would be less than significant.”

DD-185 **This area is zoned for Low-Density Residential the new traffic restrictions would significantly impact the population and housing in the CIVITA area and the Abbotts Hill area, why was this not mentioned. Will this be included? If not why not?**

Page 394/432

“7.7 Public Services and Facilities

“Overall, the proposed project would be adequately served by the existing area fire-rescue department facilities, would not generate the need for a new or expanded fire station in the project site, and would generally improve emergency access and thus response times. No impact would occur.”

DD-186 **How can a road with 25,000 more cars improve response times? Was the current emergency access at Kapan Drive and Aperture Circle considered in this determination? Would the current access be easier, faster, more efficient then a new road with increased traffic? Please explain reasoning and consider the actual facts as required by CEQA. How can police get through 25,000 cars to service Abbotts Hill or CIVITA during traffic times verse currently with only 2,400 cars? How can children of Abbotts Hill or CIVITA safely get to school with morning and afternoon traffic delays up to 43 minutes? Is it even safe for children to walk to school with that much traffic in a residential neighborhood? Wouldn't traffic block children from traveling between their home and school? Plus there is no cross walks to cross Phyllis Place at all, on the entire small 8,000 car capacity per day, low density residential road that would be made into a 5 lane major artery. Please remove that no impact would occur as it is not able to be proven, given the evidence.**

DD-187 Page 394/432



↑
“Also, as discussed in Section 5.2, Transportation and Circulation, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.”

DD-187
(cont'd)

These statements are unfounded and must be removed. How would the road connection accommodate roadway network demands? It does not add any entrances to the 805; it will only over load the current entrances and exits to the 805? How would the connection improve emergency access between the areas? There is already a connection for emergency vehicles at Kaplan Drive. Even if the proposed connection does not increase the population, traffic delays would significantly slow down response times to area west of proposed connection as stated in the data of the traffic analysis. Please correct contradictions with data.

“No residential housing component is proposed under the CPA; therefore, local school districts would not be affected by implementation of the project. No significant impacts to schools would result.”

DD-188

Schools would be affected as there is proposed to be a school on Via Alta, the increase in traffic would seriously diminish the safety for children to walk to school, considering there is only one cross walk on Via Alta. Please correct false statement. Mission Valley will build a school in CIVITA to support the population and therefore would not need access to schools in Serra Mesa. Therefore the connection would not be needed for this purpose. Please correct false statements.

“Parks and Recreational Facilities

Future implementation of the street connection would increase pedestrian and bicycle access from Phyllis Place to parks and recreational amenities within the Civita project.”

DD-189

False, the implementation of the street connection would not increase pedestrian and bicycle access due to increased vehicular traffic. A connection for pedestrian and bicycle access already exists with current approved plan through the park and at Kaplan Drive and further vehicular traffic would only deter the use of the road for this purpose. Will this inaccuracy be corrected? Will a study that proves these conclusions be included? If not, will increase of access for pedestrian and bicycle removed? If not, why not?

Page 395/432

“Police Services

As confirmed with SDPD, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Brown pers. comm.). The additional access route would improve emergency access in the area, potentially reducing emergency response times associated with police responders.”

DD-190

What proves the increase in circulation efficiency, the traffic studies conducted in this DEIR prove this not to be true? How would this access improve emergency access in the area? As there is already emergency access connecting the two communities in this area that is not hindered by increased vehicular

DD-190
(cont'd)

↑ traffic, please explain use KAPLAN DRIVE? The increase in traffic to this area would result in slower response times for residents to the west of proposed connection; as Phyllis Place is the only access for emergency services to this area. 'As confirmed by SDPD that additional access points generally improve emergency access' this statement is ludacris, you cannot justify a road connection by a general statement when that general statement does not fit the project area. The access that is being considered increases the traffic in the area form 2400 cars to 35000 cars and traps an entire community with only one ingress and egress. This entire statement need removed as it is inappropriate to use a blanket statement without any facts to back it up and only information that proves it contrary. Will it be removed? If not why not? Justify false statement.

DD-191

Page 394/432

"Fire-Rescue Services

As confirmed with the San Diego Fire-Rescue Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Trame pers. comm.)."

False, access already exists at Kaplan Drive; the proposed connection would decrease accessibility by increasing traffic and making the area less accessible. Will this be included? If not, why not? You cannot use general statements as justification when there is proof that this general statement does not apply. Remove it! Or PROVE it!

DD-192

"As such, the CPA is anticipated to result in better response times for the nearby fire stations." **False, prove how this would result in better response times when the response times are already at acceptable levels and the DEIR says it would not help the residents close to the connection?**

DD-193

"Moreover, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access."

False, where is the proof that the connection would increase circulation efficiency? The studies prove otherwise. Prove how the increase in vehicular traffic would improve access that already exists without vehicular traffic? The immediate project vicinity will be the area most negatively affected and will not have improved circulation and emergency access as there will be 35,000 more cars in the area with the connection. Explain how the conclusion is drawn, will data be provided to back up conclusions facts? If not, why not?

DD-194

Page 396/432

"7.8 Public Utilities Electricity and Natural Gas"

↓

DD-194 (cont'd) ↑
How will the large pipeline under proposed road connection be affected? If approved would the pipe line be moved or altered? How would pipeline be accessed in case of emergency if it is under a 4 lane paved road way?

DD-195
Page 397/432
“7.9 Recreation”
The CPA area is currently vacant and designated Low-Density Residential (five to nine units per acre)”
How can this Low-Density Residential area support the large density traffic from Mission Valley? Where will cars park to go to the Park if the road must be widened to 5 lanes and there will be no parking on the side of the Phyllis Place as there is now?

DD-196
“SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES
Permanent changes as a result of amendment implementation would include traffic, noise, and an increased human presence in the area.”
Please include the previous statement in the conclusions as the impact is significant and is required by CEQA to be included. Does increased human presence impact neighborhood character? Does traffic and noise impact neighborhood character? If so please also update the section regarding neighborhood character.

DD-197
Page 399/432
“CHAPTER 8 MANDATORY DISCUSSION AREAS
(1) significant effects which cannot be avoided; (2) significant irreversible environmental changes which cannot be avoided if the project is implemented; and (3) growth-inducing impacts.
8.1 SIGNIFICANT EFFECTS WHICH CANNOT BE AVOIDED
What are the costs of the mitigations? Will all mitigations be done? What is the time frame in relation to the road connection being implemented?

DD-198
Page 402/432
“8.3 Growth-Inducing Impacts
Significant growth impacts could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those anticipated by local or regional plans and policies.

DD-198 (cont'd)	<p>2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area”</p> <p>The Low-Density Residential area in the propose CPA is not planned for a density or growth rate of the population from Mission Valley? Please explain why this was not considered in this analysis, will it be included? If not, why not?</p>
DD-199	<p>-</p> <p>“3. Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvement Project list, when such infrastructure exceeds the needs of the project and could accommodate future development.”</p> <p>What are the costs of these Capital Improvements?</p>
DD-200	<p>How can no significant new traffic be generated when all the roads in the area will be going from ratings of ABC to E and F with delays of 43 minutes at peak times? Please explain and give proof with data as required per CEQA.</p>
DD-201	<p>The question asked if the project could accommodate future development and Serra Mesa cannot as it is already delayed to get on the 805 and the Low-Density Residential area west of the proposed connection will be separated from the rest of the Serra Mesa Community and not easily accessible. Please include in DEIR, if not explain why not.</p>
DD-202	<p>Proposed connection will alter the community of Serra Mesa’s Plan, distribution of traffic and the density in the area based on DEIR findings, will it be proven that the proposed CPA will not substantially effect the population of this area? If not, why not?</p>
DD-203	<p>-</p> <p>Page 280,281/317</p> <p>“CHAPTER 9 ALTERNATIVES</p> <p>The CEQA Guidelines also require a discussion of why other alternatives were rejected if they were considered in developing the project and still would meet the project objectives.</p> <p>9.2 Project Objectives</p> <p>Project Objectives, of the DEIR, and are included here as follows:</p> <p>1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.”</p>

DD-203 (cont'd)	<p>Describe and evaluate why the Mission Valley Plan is not being resolved to be consistent with the Serra Mesa Plan? Resulting in less government money spent and better circulation for Serra Mesa as well as safer and pedestrian and bicycle connections between the two communities.</p>
DD-204	<p>2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.</p> <p>Traffic studies contained in this DEIR prove the connection will not improve circulation, please prove and remove false statement. Traffic circulation will fall from LOS ABCs to all Es and Fs on every road connection studied, how does that improve circulation?</p>
DD-205	<p>3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.</p> <p>Traffic studies contained in this DEIR prove the connection will not improve traffic congestion, please prove and remove false statement. Traffic circulation will fall from LOS ABCs to all Es and Fs on every road connection studied, how does that improve circulation?</p>
DD-206	<p>4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.</p> <p>Kaplan needs to be considered in this analysis and it's lack of consideration based on proof that this DEIR has knowledge of its existence is gross negligence and all conclusions drawn about improving access of any kind is false because access already exists.</p>
DD-207	<p>5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.</p> <p>How does allowing vehicular traffic on paths currently approved and planned for only cyclists and pedestrians allow for safer travel conditions than without vehicles?</p>
DD-208	<p>• Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.</p> <p>Why was this removed since the PEIR? Will it be included? Why or why not? The current approved plan already has interconnectivity between the communities and will have a pedestrian and cyclist path through the park where this connection is proposed. The Bicycle Master Plan is safer without traffic congestion on paths lowering vehicular accidents with cyclists and pedestrians and increasing walkability decreasing vehicles on the road. Why is the No Project Alternative not more superior in every way?</p>

DD-209

As stated in Appendix C “Another alternative for consideration involves a pedestrian and bicycle only path should there be no public road connection via Franklin Ridge Road to Phyllis Place. Were there not to be a roadway connection there would at least be some public pedestrian and bicycle path system for those users to get between the two communities even if vehicles could not make that connection, particularly since a park will be created at the upper end of the grade along Phyllis Place.” **More proof that the No Project Alternative will also include the connection for pedestrians and cyclists in compliance with the General Plan and Bicycle Master Plan.**

DD-210

“9.3 Significant Impacts

Not all impacts have mitigations that would reduce potentially significant impacts to less-than-significant levels.

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.”
DEIR 38-42/432

The road connection has been shown by studies in this DEIR to be more negatively impactful for the community of Serra Mesa than not having the connection at all. The summaries continue to state less than significant impacts when the facts in the tables support more detrimental effects with connection than without. Please review false statements contradictory to the evidence presented by the studies done on the supporting tables.

DD-211

“The focus of this alternatives analysis is to identify feasible alternatives that would reduce or avoid the significant impacts of the proposed CPA.”

The feasible alternatives have been overlooked and not analyzed as required by CEQA. If accurately analyzed the alternatives would be shown to be superior to the proposed project in every way based on the traffic data in Appendix C.

DD-212

“9.4 Alternatives Eliminated from Detailed Consideration

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.”

The proposed CPA fails to meet the most basic project objectives and does not help traffic or congestion at all, in fact makes it worse based on all the data in the traffic study in Appendix C. The alternatives were not accurately studied, as emergency access is existing at Kaplan Drive; Intercommunity connectivity exists with Mission Center Drive and Mission Village Drive; Trails connecting to the Master Bike Plan will exist between communities on Phyllis Place and already currently exist at Kaplan Drive and other areas throughout the community. Based on the insufficient study of evidence the No Project Alternative would prove superior as it meets all the environmental goals and it's only exception is it does not resolve the inconsistencies between plans; which can more easily be done by amending the Mission

DD-212
(cont'd)

Valley Plan, as changes to the Serra Mesa Plan would still create inconsistencies within the City's General Plan, Master Bike Plan, Mission Valley Plan and Serra Mesa Plan. Changing the Mission Valley plan while currently undergoing a plan update would require much less changes and allow all the plans to be compliant with one another. See section analyzing Plans that was left out of the DEIR on previous pages.

"Alternatives Under Consideration

The key question and first step in analysis of the off-site location "is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location" (14 CCR 15126.6(f)(2)(A)).

The City of San Diego considered two alternative alignments. Both would be slightly to the east of the proposed alignment."

DD-213

Why were other sites not considered such as sites currently in the community plan for access to Mission Valley? Where exactly were these sites considered? Where is the information on why other sites were not acceptable? What about the Unnamed Road on the East side of the 805 and North side of Friars to access 805? The road already exists and there are no residential neighborhoods or homes that would be directly negatively affected by this connection to 805. Why was this option not considered? Why was an onramp from Mission Center Road not considered to bypass the traffic in the residential neighborhood on Murray Ridge Road? Why wasn't access from Qualcomm and Texas near the 8 freeway considered? As Texas and Qualcomm cannot get to the 805 without going to Mission Center Road; access from the 8 to the 805 in this section could significantly decrease the traffic in Mission Valley and the backups that happen at Mission Center Road and the 8 Freeway.

"Amend the Mission Valley Community Plan To resolve the conflict between the Mission Valley and Serra Mesa Community Plan, an alternative could be to amend the Mission Valley Community Plan to remove any reference to a street connection with Serra Mesa on Phyllis Place. This alternative is rejected because it would not promote intercommunity connectivity as envisioned in the City's General Plan."

DD-214

Why is this plan rejected? The City's General Plan is to have intercommunity connectivity and there is already existing connectivity between the communities on Mission Center Road as well as multiple bicycle and pedestrian paths currently in the approved plan on Kaplan Drive and through the Park linking the two communities. Adding vehicular traffic would actually be counterproductive to the City's General Plan in that it would not further encourage interconnectivity of pedestrian networks nor result in less congestion and improved circulation. Mission Valley has been approved to build very large, very dense housing due to access to mass transportation options. By building a second vehicular connection the housing developed on the approval of mass transportation would be flawed as mass transportation, biking and walking would not be encouraged to promote effective mobility networks to effectively move workers and residents. Encouraging bike and pedestrian traffic would decrease vehicular traffic and congestion and improve overall circulation. Therefore an amendment to the Mission Valley Plan would be the best alternative to promote intercommunity connectivity as envisioned in the City's General Plan. Prove why it would not promote better, safer, intercommunity connectivity without the road.

“No Project Alternative

DD-215 **Couldn’t this be alleviated by amending Mission Valley’s Plan instead? How was it concluded that the impacts on land use would be greater than the proposed project? No Project Alternative would have less impact on land use than proposed project by encouraging Mass Transportation/Transit in Mission Valley. The following is directly from the City’s General Plan and why the proposed project is not in compliance with the General Plan:**

General Plan: the following are quotes from the San Diego General Plan

<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf>

“Mobility Element of San Diego General Plan:

DD-216 C. Street and Freeway System Goals

- ♦ A street and freeway system that balances the needs of multiple users of the public right-of-way.
- ♦ An interconnected street system that provides multiple linkages within and between communities.
- ♦ Vehicle congestion relief.”

The proposed connection does not relieve the vehicle congestion as stated as a Goal in the General Plan. Encouraging mass transportation would in fact relieve congestion without the proposed road connection.

DD-217 **“♦ Safe and efficient street design that minimizes environmental and neighborhood impacts.” The proposed connection does not allow safe and efficient street design as it will negatively impact traffic and other environmental concerns. The road connection does not minimize environmental impact of the neighborhood of Serra Mesa. This is not a comment but a fact based on numbers in the data, please include.**

“♦ Well maintained streets.

Discussion

DD-218 Streets and freeways comprise the framework of our transportation system and play a major role in shaping the form of the City. The quality of the roadway system affects us whether we travel by automobile, transit, bicycle, or foot, and influences which mode of travel we choose.”

By choosing to only support transit, bicycle or foot alternatives the city is encouraging these modes of travel. If the road connection were to be approved it would in effect be encouraging automobile traffic instead, which is not consistent with the general plan. Please correct false statements and include counter argument based on evidence in the data.

Quoted from the San Diego General Plan

“The RTP calls for efficiency improvements using system and transportation demand management strategies, transit service improvements, bicycling and walking infrastructure improvements, and support for transit-oriented design and development.

DD-219 A finer level of street system details may be provided at the community plan level.

Adopted community plans specify the planned system of classified streets within the local community.



DD-219 (cont'd)	<p>Travelers benefit from shorter trips and multiple route options, and are more likely to walk or bicycle if distances are short. While vehicle congestion relief is an overall goal of the Mobility Element, the degree of acceptable vehicle congestion will vary in different locations based on the function of the roadway and the desired community character. <u>Decisions that must balance the benefits and impacts of designing our transportation system for multiple modes of transportation will need to be made at the community plan or project level.</u></p> <p><u>As stated in the General Plan, vehicle congestions relief is the overall goal, travelers are more likely to walk or bicycle if distances are short such as to an adjacent community and this is to be done at the community plan project level not dictated by larger government. The desired community character is not achieved by this proposed connection as shown by the Serra Mesa Planning Group's 10-0 vote against the connection.</u></p>
DD-220	<p>"ME-C.1 b. Implement street improvements and <u>multi-modal transportation improvements</u> as needed with new development and as areas redevelop over time.</p> <p>e. <u>Increase public input in transportation decision-making</u>, including seeking input from multiple communities where transportation issues cross community boundaries." The General Plan states that public input should be increased in decision-making and public input is to reject the connection and please do not waste any more tax dollars on this issue ever again. Mission Valley Planning Group did not support the connection and Serra Mesa Planning Group strongly opposed the connection. Will public input and community group's recommendations be considered in the approval of this DEIR? Will this issue continue to be brought up? When will the wasted tax dollars stop? Why are the community's wishes not being heard? Will the Mission Valley Community Plan be updated to reflect no road connection to stop this government waste for an unwanted, unneeded, detrimental connection?</p>
DD-221	<p>"ME-C.3 b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be <u>designed to control traffic volumes and speeds through residential neighborhoods.</u>"</p> <p>These collector roads are specifically for routes to schools, parks, and village centers not to gain access to a major freeway that would not control traffic volumes nor speed through Serra Mesa's or Mission Valley's residential neighborhoods. Will the DEIR include this contradiction in the San Diego General Plan?</p>
DD-222	<p>"d. Where possible, design or redesign the street network, <u>so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.</u>"</p> <p>Allowing vehicular traffic at this proposed connection site would form barriers to pedestrian traffic and community cohesiveness with increased traffic congestion, noise and air pollution discouraging pedestrian traffic. All information found in the General Plan support this statement. Will this be added to the DEIR? If not, why not?</p>
DD-223	<p>-</p> <p><u>"Transportation/Circulation and Parking</u></p>

DD-223 (cont'd)	<p>↑</p> <p>How is the traffic not going to be redistributed into Phyllis Place if that is the intersection that the proposed changes will occur? Phyllis Place is the only entrance and exit for an entirely residential community and would be directly impacted by the proposed CPA and the delays on 805 onramps, backing up onto Phyllis Place, directly impeding traffic flow on Phyllis Place.</p>
DD-224	<p><u>“Noise”</u></p> <p>Why was it not included that the noise in Civita would still be less without the road connection? As traffic from Serra Mesa, Mission Valley East, Mission City, North Park and University Heights between Mission Center Road and Mission Village drive would all have direct access to 805 creating noise and a bottle neck effect on Franklin Ridge Road for all the Civita residents as well?</p>
DD-225	<p><u>“Project Objectives</u></p> <p>In quotations are the objectives of the proposed CPA, followed by reasons why the No Project Alternative would still meet propose DEIR objectives and better than proposed CPA.</p>
DD-226	<p>“The objectives of the proposed CPA are to:</p> <ol style="list-style-type: none"> 1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. <p>The inconsistency between community plans would be resolved if the Mission Valley plan was amended. Not requiring Serra Mesa’s Plan to be altered and still meeting the objectives.</p>
DD-227	<ol style="list-style-type: none"> 2. Improve local mobility in the Serra Mesa and Mission Valley planning areas. 3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. <p>The circulation would be improved by the pedestrian and bicycle path through the park that is already planned and located where the CPA is proposed. Also by the access on Kaplan Drive that was not mentioned in the DEIR. Residents and frequent users of the Mission Valley Area are encouraged to use Mass Transportation/Transit, walk or bike into Mission Valley to avoid driving in traffic. Therefore improving overall circulation and increasing the use of mass transit thus alleviating traffic congestion and improving navigational efficiency to and from local freeway on off ramps for surrounding areas. The proposed CPA does not prove to alleviate traffic congestion yet does make it worse than doing nothing.</p>
DD-228	<ol style="list-style-type: none"> 4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. <p>No Project Alternative would not increase vehicular traffic on Phyllis Place and allow current emergency access from Serra Mess to Civita to be more efficient with faster response times than at high traffic times</p> <p>↓</p>

DD-228 (cont'd) ↑
if the connection were approved. There is currently an evacuation route for the residents of Serra Mesa and Civita to the West of proposed road connection which would experience less traffic during an evacuation than if the proposed road was approved. Why was Kaplan Drive not mentioned or considered in this DEIR? It has been in existence for years and is in Appendix A under letters written to this DEIR yet it was not used to show existing emergency or evacuation access. Would the inclusion of this information change the recommendation of this DEIR? Why was the Kaplan road connection left out of the study?

DD-229
5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

The No Project Alternative would allow safer travel conditions for motorists, cyclists, and pedestrians, separating vehicular traffic on the main roads from pedestrian and cyclist's paths going through the park on a designated, safer, quieter, less congested, less polluted path, preserving the desired community character and minimizing environmental and neighborhood impacts. See:
<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf> C. Street and Freeway System Mobility Element Discussion

DD-230
• "Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities."

The General Plan and Master Bicycle Master Plan would still be implemented without the connection because interconnectivity between communities would be achieved through the current path attached to the west of Civita at Kaplan Drive connecting Mission Valley and Serra Mesa by foot and bike along with the added bike and pedestrian path that will be attached to Civita on Phyllis Place already planned and approved, yet not mentioned in this DEIR. Why was it not mentioned? Will it be mentioned? If not, why not mention because it exists and it was not considered per CEQA? Connectivity between the communities is already achieved for community activities as walking and biking short distances are conducive to community activities. A road would cause a through fare to access 805 causing a detriment to the neighborhoods and safety of the current community.

DD-231
"Conclusion"
As proven above the No Project Alternative would eliminate potentially significant environment impacts associated with the proposed CPA as well as save tax payers money. All of the objectives are already met except plan inconsistency which is an unfair objective as it is too narrowly focused and could be met by a plan amendment to Mission Valley. Please show substantial evidence, as shown in this letter, to support the inappropriately drawn conclusion as per CEQA. Will this be done? If not, why not?

DD-232 ↓
"Bicycle, Pedestrian, and Emergency Access Only Alternative"

↑
The proposed Alternative would still require an amendment to the Serra Mesa Community Plan since the current Community Plan does not provide for any road connection from Phyllis Place to the Mission Valley Community Plan.”

DD-232
(cont'd) **There is already a complete, usable Emergency, bicycle, pedestrian connection between Serra Mesa and Mission Valley though the housing development in Serra Mesa to the west of Phyllis Place at the end of Kaplan Drive and Aperture Circle. It is a known connection why is it left out? Is the omission convenient to discredit the No Project Alternative?**

“Land Use”

DD-233 **Mission Valley Plan can be amended to not include the street connection, why was this alternative discounted? It is false to say that the impacts on land use would be greater than proposed project, where are the facts? A pedestrian and bike path would be a better use of land and be more consistent with the General Plan and the Serra Mesa Plan, please prove otherwise with facts. Facts to support the No Project Alternative are contained in this letter and have been quoted from the General Plan. It is inappropriate to discount an alternative based on narrow objectives that are hiding the underlying purpose of the project which is to build the road connection. The objectives are too narrow and the DEIR’s treatment of alternatives are inadequate because they unreasonably limit alternatives analysis per CEQA. Will the conclusion be drawn that the No Project Alternative is superior for land use and will be greater than the proposed project? If not, why not?**

“Transportation/Circulation and Parking”

This alternative would result in a similar array of impacts as those disclosed for the CPA. As shown, the Bicycle, Pedestrian and Emergency Access Only Alternative would improve the time traveled associated with Hospitals and Fire. Because private vehicles would be prohibited, the improvements in travel time to non-emergency facilities would not occur. As compared to the proposed CPA, the Bicycle, Pedestrian and Emergency Access Only Alternative would address the emergency access and bike and pedestrian goals, but would not meet the project goals.

Community Access Travel Times

DD-234

Facility Type	Representative Accessibility Time Travel (min.) Without Connection	With Connection
Hospitals	39	31
Fire Department	42	32
Schools	153	135
Libraries	40	32
Shopping Centers	69	57
Parks	58	50”

↓

DD-234 (cont'd) ↑
Where did these numbers come from? At what locations are the travel times from? No place in Serra Mesa takes that long to get anywhere now; how can it be shorter with more traffic and cars on the road? How are the times estimated? Fire and emergency responses are around 6 minutes based on the average fire department response times, so why does it say 42 min on the table found in 9-1?

DD-235
“2.5.1 Average response times for Serra Mesa are 5 minutes 51 seconds for the primary engine and 6 minutes 21 seconds for the secondary truck (City of San Diego 2012a). Average response times for West Mission Valley are 6 minutes and 40 sections (City of San Diego 2013a).”
These times are within normal limits, how do the times of 42 and 32 minutes correlate with the actual response times? Why was the average response times not used in this analysis?

DD-236
*** “Therefore, the traffic study concluded there was limited additional benefit to these more than 200 homes for evacuation by having a road connection.” ***
This is a statement from the DEIR stating there was limited addition benefit of evacuation. Can it also be concluded there is limited addition benefit to the time travel with or without the connection? How is this table significant? What does it represent? Is it generalizable over the entire Community or only the two locations studied? Will this table be removed for lack of relevancy? If not, why not? There are two hospitals in Serra Mesa and both are under 39 minutes to get to so where are these numbers from and how is it figured that it would be faster if there were more delays to get onto 805 that services these hospitals? If the ramp delays are 43 minutes like projected, will this also add 43 minutes to the travel times for community access? Why was this not factored into the time tables? What routes were taken to get to the community access locations? What time of day, day of the week, month etc. was used to make these times? Was traffic factored in? Will it be? Please discuss.

DD-237
-
“Project Objectives
The no project alternative would not resolve the first objective: inconsistency between two community plans; although this could be done by amending the Mission Valley Plan instead. Amending the plan should be done to update the inferior plan, not just to make the plans the same no matter the negative results to the community. Don’t plans exist to protect the community and not to just make them the same? The points under the second and third objective are the most important to the community environment, and less about the rhetoric, and would be met. Is this correct? Will this be update? If not, why not? Please provide data per CEQA. As circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan would all improve without the propose CPA. Only one objective would be met with the propose CPA; that could be met with an amendment to the Mission Valley plan instead.

DD-238
“Conclusion”
Under the no project alternative significant impacts would be reduced and avoided when compared to the proposed CPA: circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan would all improve without the propose CPA. All of which would be significantly negatively impacted with proposed CPA as stated under significant, unavoidable, unmitigable impacts based on this DEIR. The same physical footprint does not represent the same environmental impact please address this as the issue

DD-238
(cont'd)

is environmental impact not physical impact. Transportation/ circulation and parking would not be the same in any way under the No Project Alternative as the Mission Valley Community grows the existing plan for a pedestrian and cycling path that has been approved in both community plans would meet many of the project goals: improve circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan by increasing use of alternative transportation and intercommunity connectivity. Please correct false statements based on the information in this DEIR as the conclusions are false.

“Summary”

The summaries of impacts are not true statements. Please discuss the facts that led to these conclusions and included Kaplan Drive and the trail connections. The project objectives include reducing traffic, how can the proposed project meet that goal with data in appendix C stating the opposite? How can a No Project Alternative have similar impact to transportation or any environmental issue when there would be no increase to traffic, circulation and parking, no increase to Noise, Hydrology and Water quality? The No Project Alternative can meet all the objectives when including a plan amendment change to Mission Valley’s Plan. Please explain why this is not true? Similar impacts are not accurate as traffic and circulation are proved to be better with the No Project Alternative see table below:

DD-239

Extracted from Table 7-1 Significant Impact Comparison

Without Franklin Ridge Road Connection	With Franklin Ridge Road Connection
Segmental Impacts:	Segmental Impacts:
	Phyllis Place from Franklin Ridge Road to I-805 SB Ramp
	Franklin Ridge Road from Via Alta to Civita Boulevard
Intersection Impacts:	Intersection Impacts:
Mission Center Road / Murray Ridge Road	Murray Ridge Road / Sandroek Road
	Murray Ridge Road / I-805 NB ramp
	Via Alta / Franklin Ridge Road
Freeway Ramp Meter Impacts:	Freeway Ramp Meter Impacts:
	I-805 NB On-Ramp at Murray Ridge Road
	I-805 SB On-Ramp at Murray Ridge Road

Appendix C

***Shown are the significant impacts that are not the same with or with the connection. This proves overwhelming significant impacts with Connection verse only Mission Center Road/ Murry Ridge Road without. Will this table be included? Does this prove beyond a shadow of a doubt that the traffic/ circulation and congestion will not be similar and in fact will be significantly better with the connection? If not, why not? Please prove otherwise and prove data to support conclusion, otherwise please change to be correct in conclusion based on this data.**

DD-240

Please show data that conclusions were drawn from? Please remove incorrect tables or correct as the table are false based on the fact that Kaplan Drive was not taken into consideration. The circulation

DD-240 linages would still be implemented in accordance with the approved plans for a pedestrian and cycling
(cont'd) path through the Park and at Kaplan Drive linking the communities without the connection.

DD-241 Prove how alternatives would have more environmental impacts on land use. How would the alternatives not comply with the General Plan when it would decrease the amount of vehicular traffic and increase emergency access?

DD-242 The impacts on noise would not be less than significant with mitigation. Although it may be possible to mitigate the noise during construction of the road by working within daytime hours, the traffic noise once constructed would significantly increase due to increased traffic and the 10% steep grade that is not mitigable after construction that would continue to have significant negative impacts on the community. Lastly, most of the project objectives would not be met, as the proposed CPA would not improve circulation, alleviate traffic congestion, efficiency, allow safety for motorists, cyclists, and pedestrians along the street, improve emergency access or evacuation routes where as both alternatives would meet all objectives except resolving the inconsistencies between the two community plans, which can be done by amending the Mission Valley Plan as mentioned. How are impacts to traffic, circulation and parking remaining significant and unavoidable meeting the project objectives of decreasing traffic and improving circulation? Please discuss how the objects are met.

DD-243 Just because the No Project Alternative would not resolve the inconsistency between the Mission Valley and Serra Mesa Community Plans does not mean that it would have a greater environmental impact than the proposed project. Correlation does not equal causation. It is impossible and has not been proven in this DEIR that the impact on transportation/circulation and Parking that is stated to be “significant and unavoidable” under the proposed project would also be similarly significant and unavoidable in the No Project Alternative. As the No Project Alternative does not increase wait times to 43 mins for the 805 ramp and allows residential traffic to the west of proposed project an uncongested entrance and exit from and to the community unlike proposed CPA. No Project Alternative does meet most project objectives; Doesn’t it? The No Project Alternative would improve circulation, alleviate traffic congestion, efficiency, allow safety for motorists, cyclists, and pedestrians along the street and improve emergency access and evacuation routes by promoting walking and cycling paths instead of vehicular traffic and allowing open road ways for the current emergency and evacuation routes to be accessed in the event they are needed. Prove otherwise and correct incorrect information in tables.

DD-244 The plan inconsistencies are not part of the environmental impact but rather just words on paper that can be amended in the favor of the most environmentally friendly outcome which is not connecting the roads.

DD-245 “All mitigation measures contained in the Environmental Impact Report shall be made conditions of the project as may be further described below.”

DD-245
(cont'd)

↑
‘All mitigations shall be conditions’ is a statement that is contradictory to the projects objective the City’s General Plan and both community plans. For example the mitigation below is not recommended and impact would remain significant and unavoidable either by eliminating bike lanes and parking for road widening or by requiring removal of residences on both sides of Murry Ridge road. If “ALL MITIGATIONS” are conditions of the project the project must not go through based on the findings of this DEIR.

DD-246

“Murray Ridge Road from Mission Center Road to Pinecrest Avenue: a. Murray Ridge Road from Mission Center Road Pinecrest Avenue shall be restriped consistent with a 4-lane Collector. i. Currently, Murray Ridge Road provides Class II bike facilities and onstreet parking. The proposed mitigation would either repurpose the existing right of way to provide four travel lanes by eliminating the bike lanes and on-street parking, or widen the roadway to accommodate four travel lanes and maintain Class II bike facilities and on-street parking. Widening the roadway would require removal of residences on both the east and west sides of Murray Ridge Road along the entire stretch of roadway segment. Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), **it is not recommended, and the impact would remain significant and unavoidable.**” The General, Bike, Pedestrian and Serra Mesa Plans do not supports many of the conditional mitigations, eliminating bike lanes, parking and homes. Therefore the No Project Alternative is environmentally superior to the proposed CPA.

DD-247

If all mitigations are required as stated in DEIR and most are not recommended and would remain significant and unavoidable why would the DEIR recommend the proposed CPA as the superior alternative at all? Why is it stated on tables that alternatives have “Similar impacts” when the ALL mitigations are conditions of the project and most mitigation under transportation and circulation are “not recommended and would remain significant and unavoidable.”? Tables also state the proposed project “Meets Most Project Objectives?” After conditional mitigations the project objectives are no longer met and in actuality the proposal is less complaint with the City’s General Plan and Community Plans after conditional mitigations than the No Project Alternative.

For example

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.” DEIR 38-42/432

The DEIR contradicts itself in all places in which it states that the propose CPA would be recommended or would benefit the communities circulation/ traffic, General Plans, Community Plans or any other place it states a positive impact based on the results of the mitigation conditions and the finding in other sections. Please correct to be in compliance with CEQA.

Appendix A

DD-248

Where are the answers to the questions from 2012? The connection at Kaplan was mentioned in this Appendix and nowhere else. Why was Kaplan Drive and the trail south of Phyllis not included in the analysis when it was known about because it is published in the Appendix? Did anyone read the letters the appendix? Issues that were discussed in the appendix are still not addressed it this DEIR.

↓

DD-248 (cont'd) ↑ Caltrans wrote a letter included in Appendix A stating that traffic data should not be more than 2 years old. The traffic data is dated Feb 2012 which is not within the last 2 years, why was this data not updated? Will the data be updated?

Appendix C

DD-249 Alternatives were not well studied or thought out. Why were no mitigations proposed for the No Project Alternative or the alternative with pedestrian, cyclist and emergency only in order to fully explain the alternatives?

DD-250 The DEIR does not analyze any connections to Mission Valley other than Mission Center Road going north. Were other connection studied to be in compliance with CEQA? How can decrease traffic and congestion be shown if it was not studied? Other factors that directly effect this traffic are the onramps and connections of the 163, Mission Center Road connection to the 8 that gives access to the 805, Texas which is a major intersection becoming Qualcomm Way becoming Franklin Ridge Road. Currently from Texas there is no access to the 805 from the 8 which will be a huge impact on traffic from neighboring communities currently being mitigated by multiple route options besides the 805 that give relief to the 805 in this area. Mission Village Drive is not analyzed even though it also feeds onto Murry Ridge Road as an access to 805 from Mission Valley.

DD-251 Freeway Mainline Conditions The existing freeway analysis is summarized as shown currently, the following freeway segment does not operate at LOS D or better:

x I-805 N from I-8 to Mesa College Drive On-Ramp – LOS F (AM)

x I-805 N from Mesa College Drive On-Ramp to SR-163 – LOS F (AM)

x I-805 S from Mesa College Drive On-Ramp to Murray Ridge Road – LOS F (PM)

Why wasn't allowing access North on either the 163 and/or the 805 studied to relieve the currently failing freeway segments at Mesa College Drive? What the traffic coming from Mesa College Drive exiting on Phyllis Place and Murry Ridge Road to turn around to go North studied? As a large number of cars go South on 805 and exit to go back on the freeway in order to go North because there is no North option at Mesa College Drive. Mesa College Drive backs up for hours every day, and has multiple exits. Would Phyllis Place, Via Alta and Franklin Ridge Road also back up for hours every day?

DD-252 ↓ Already 805 is operating at an F, the reason there is traffic on Mission Center Road is because 805 is an F not because there is not enough access to the 805. Allowing more access to the 805 would create even further congestion. Is this correct? Why can't Mission Valley and Serra Mesa be connected through streets not in residential areas? Why aren't other connections being studied? The objective is to further connect the two communities not to get Mission Valley traffic onto the 805 through residential neighborhoods; so why does the road have to go through residential neighborhoods and single outlet cul-de-sacs against the General and Community plans? Please explain reasoning to why the road is only

DD-252
(cont'd)

↑
proposed to connect to Phyllis Place and not another location? When the Mission Valley Plan was created to include the road connection was the Civita development considered? Was Civita in the Community Plan? Or was the road planned to go through a Rock Quarry with no residences which would have been in line with the General and Community Plans? Why is the Mission Valley Plan not being updated to not include the road based on the new development that was not already in the plans when the original road connection was proposed? Will alternatives be evaluated per CEQA? If not why not?

DD-253

Current conditions are already an F to enter onto 805 NB and a D to enter SB, adding a connection will not speed up traffic on the 805. The problem is the 805 not the road connection. Adding more traffic to the bridge over 805 from Franklin Ridge Road will not help the traffic coming from the Murry Ridge Road as both roads are going to the same place: the 805. The connection is posed to not increase traffic on Mission Center Road by 10,786 cars while adding 32,120 cars to Phyllis Place. Adding a net of 21,334 more cars trying to get onto the 805 and effectively backing up Mission Center road and trapping the Abbots Hill community from exiting or having emergency services enter. Please explain how adding 21,334 cars per day into the neighborhoods of Civita and Phyllis Place will decrease traffic and congestion for Serra Mesa or Mission Valley as proposed? Will the 805 run any smoother or not remain an LOS F with 21,334 more cars trying to use it? Will the community character of walkable neighborhoods be impacted? The following is a marketing promo for Civita all the words are speaking about the character of the neighborhood and why people are buying into the Walkable neighborhood. The promo states “walk everywhere...and experience the world at 3mph”. How will the community character not be affected when there are 35,000 cars traveling through the community, decreasing walkability and safety? Please explain and correct in DEIR.

DD-254

MARKETING PROMO FOR CIVITA BY SUDBERRY YOUTUBE VIDEO POSTED 12/10/2011
<https://www.youtube.com/watch?v=mM6F8u8RdQY>

“Ditch the Car...

And Get Your Walk On...

CIVITA, The new WALK-EVERYWHERE Community.

Urban Life, Village Charm,

Places to Gather and Connect

Shop till you drop

Flirt over drinks

Chill in the Park

Parks, Playgrounds, Trails

Different kinds of places

Room to Jump Run and Play

DD-254 (cont'd)

↑

For different kinds of people

Cool Sustainable Neighborhoods

Civic Spaces

Stylist shops

Where Outdoor living in King

Gardens, Patios, Decks

Walk to the Trolley

Minutes to Fashion Valley, Beaches, Little Italy, Downtown

Fresh Ideas for Living Green

Hybrid Cars you can share

Big Community Garden

Everybody's Talking Green – WE'RE WALKING IT

Water Wise, Energy Smart, Recycling Minded, LEED Gold

So Stop and Smell the Flowers...

And experience the world at 3 MPH

Where the Journey is every bit as fun as the destination.

CIVITA by Sudberry Properties

SAN DIEGO'S NEXT GREAT URBAN VILLAGE"

CEQA Guidelines: the following are quotes from CEQA and how the guidelines are not met:

DD-255

"A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid decision makers in preparing findings or statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."

The objectives are not clear enough to develop a reasonable range of alternatives as the main objective is to resolve inconsistency between community plans when the underlying purpose is to actually build a road connection. If they actual underlying purpose of the road connection was written as the object which is required by CEQA other alternatives to a road connection would have been studied and a more reasonable alternatives would have been found.

“ADEQUATE PROJECT OBJECTIVES

υ When overly broad, objectives cannot help focus alternatives

υ When objectives are defined too narrowly, an EIR’s treatment of alternatives may be inadequate, because they unreasonably limit alternatives analyses.

Do not focus on achieving certain approvals as an objective

υ This may hide the underlying environmental purpose for a project

υ Reveal underlying project purposes in objectives”

The objective of making plans consistent is too narrow and could be done by changing Mission Valley's Plan. This inappropriate narrow objective is the only reason that the alternatives were not superior and more alternatives were not considered. Please correct objectives to accurately reflect the underlying purpose of this DEIR as required by CEQA.

“An EIR shall describe a range of reasonable alternatives to 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. . . .”

The alternatives would substantially lessen impacts although the DEIR does not state the truth or back up conclusions with facts.

“Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 EIR for update of City’s General Plan did not consider “reduced development alternative,” even though approved General Plan would have SU impacts on agricultural land. City argued EIR did not need to consider such an alternative it would be inconsistent with the City’s objective to accommodate future demand for housing and employment. Held: EIR inadequate because a “reduced development alternative” would meet most of the City’s other objectives.

Over development of Mission Valley is the problem, reducing development would be a reasonable alternative even if inconsistent with the General Plan. Why was reducing development not considered an alternative to decrease traffic, congestion and parking as it would also meet underlying project objectives?

“Basic requirement: if an agency approves a project that may have one or more significant effects on the environment, the agency must adopt one or more of the following findings with respect to each significant impact:

(1) Changes or alterations have been required in, or incorporated into such project that mitigate or avoid the significant environmental effects thereof as identified in the completed environmental impact report.

DD-259 (cont'd)	<p>(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.</p> <p>(3) Specific economic, social, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation or alternatives. (Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091)”</p> <p>The mitigations do not avoid significant environmental impacts and are not mitigable below significant impact and the other two don't really apply. Therefore, the agency may not approve the propose CPA under the basic requirements of CEQA. Will this document be disapproved? How can it be insured that the connection does not waste anymore funds being investigated?</p>
DD-260	<p>“Findings need to clearly state why alternatives or mitigation that would avoid significant unavoidable effects are infeasible.” Many places in the DEIR reasons why alternatives are infeasible which is not in compliance with CEQA.</p> <p>“v The Statement of Overriding Considerations would be clear and convincing. Why is it acceptable to approve a project with significant an unavoidable impacts?</p> <p>What are the proposed projects overriding considerations to allow approval of the DEIR? They are not clear nor convincing as per CEAQ regulations. Will the conclusions be updated to reflect the data and comply with CEQA, If not, why not?</p>
DD-261	<p>“v Decision-makers may have a different view of the same issues and they can make a contrary finding, <u>as long as those decisions are supported by substantial evidence in the record.</u>”</p> <p>Where is the support of substantial evidence in record in this DEIR? Were conclusions drawn from evidence? Where is the evidence? Will it be included?</p>
DD-262	<p>“ECONOMIC INFEASIBILITY OF ALTERNATIVES</p> <p>v Test is not whether an alternative costs more, or whether proponent can afford it, but <u>whether cost is so much greater that a reasonably prudent proponent would not proceed</u> (Uphold Our Heritage v. Town of Woodside [2007]).</p> <p>v <u>Substantial evidence of economic infeasibility is key</u>. Prepare and include an economic report in the record (The Flanders Foundation v. City of Carmel-bythe-Sea [2012]).” Please prepare and include an economic report in the record.</p> <p>Is the proposed project economically feasible when the underlying environmental purpose for a project is considered? It was stated in the DEIR that there is no money for the project, why is a project proposed that does not have an economic viability?</p>

DD-262 (cont'd)	<p>↑ “The Statement of Overriding Considerations would be clear and convincing. Why is it acceptable to approve a project with significant an unavoidable impacts?”</p> <p>Where is the statement of Overriding Considerations that is clear and convincing? The proposed project has significant and unavoidable impacts and therefore must contain a statement of overriding considerations, please provide with data.</p>
DD-263	<p><u>Other Questions regarding environmental impacts of DEIR. please answer and show data and fact to show where answers came from:</u></p> <p>-Why was Mission Village Drive not considered as a connection between the two communities?</p> <p>-Why did the proposal not acknowledge the existing connection between Mission Valley and Serra Mesa though Mission Village Drive?</p>
DD-264	<p>-Why was amending the Mission Valley plan only mentioned as an alternative and not investigated as is required, please explain?</p> <p>-If the amendment was investigated please provide data showing such investigation and why it is not the superior alternative?</p>
DD-265	<p>-Explain how 43 minute delays at 805 and 54.6 minute delays with mitigation on Franklin Ridge Road make the proposed connection have a similar impact, when the no road connection shows less than 15 minutes within acceptable range even in the year 2035.</p>
DD-266	<p>-Why isn't it a bigger benefit to take cars off the road for pedestrians and bike with a traffic free trail?</p>
DD-267	<p>-How is adding vehicular traffic to the approved bike and pedestrian path through the park on Phyllis Place an improvement for the Bike Master Plan?</p>
DD-268	<p>-Why isn't improving mass transit studied as an alternative to the road connection?</p>
DD-269	<p>-Does the 4 lane connector have a center emergency lane?</p>
DD-270	<p>-This has been denied twice, why are we now wasting tax payer dollars on something that the community of Serra Mesa still does not support?</p> <p>-Why are we incurring more expense to the city rehashing failed initiatives instead of improving 163 or the 8 on ramps?</p> <p>-Why is the city spending tax dollars on a project that has already been rejected twice?</p> <p>-How much does the proposed project cost the city tax payers?</p> <p>-How much do the proposed mitigations cost the city tax payers?</p>
DD-271	<p>-Why have approved mitigations on entrance and exits of 163 not been done to alleviate traffic congestion in Mission Valley?</p> <p>↓</p>

- ↑
- DD-271 (cont'd) -Why did the proposal not study entrances and exits onto the 163, 8 and 15 freeways as alternatives to relieve traffic congestion and other factor in the DEIR?
- Why were the on and off ramps of the 163, 15 and 8 not studied as they also impact the circulation and traffic of Mission Valley and could be used to prove or disprove congestion relief with proposed project?
- DD-272 -The 805 has LOS of F currently, how can more entrances possibly help elevate traffic congestion?
- DD-273 -Why was increasing lanes on the 805 studied as an alternative?
- DD-274 -How will increased traffic with road connection improve emergency services when there is no traffic now and emergency access between communities?
- DD-275 -What are the impacts on roads in Mission Valley if the connection is not approved?
- DD-276 -Why are plans such as improvements to Ruffin Road not being considered as alternatives when they have been on the General Plans for decades?
- DD-277 -Why isn't the use or improvement to transit an alternative when Mission Valley Density was approved because of proximity to transit?
- DD-278 -Quarry Falls now Civita was built as a walk friendly area, how would more traffic affect the community characteristics?
- DD-279 -How long will it take for Abbotts Hill residents to get emergency services during traffic times when both exits are backed up with traffic? Current times are 5 minutes 51 seconds for primary engine (City of San Diego 2012a, 2.5 Emergency services)
- DD-280 -Explain the Community Access Travel Times Table; the numbers are very high for with and without connection.
- DD-281 -Why were traffic delays not calculated?
- DD-282 -Birdland has more than 3 entrances and exits and stills clogs up with traffic for hours every day, what is different about this connection and the way it will affect the residential communities of the surrounding area?
- DD-283 -Was the school on Via Alta considered in this DEIR, if not please explain why not? Children will be crossing the street with close to 35,000 cars per day, how will this impact be avoided? Please include.
- DD-284 -Why is Mission Valley's Plan not being studied to be amended instead, when it is conflicting with itself?
- DD-285 -Not a reasonable range of alternatives. Why not use the unnamed road on the East side of 805 that attached to Friars?
- Why not allow access to the 805 when getting on the 8 freeways at Qualcomm and Texas Street? Currently Mission Center Road and Fairmount Ave are overloaded as the only access to the 805 from the 8 freeway in Mission Valley. Mission Valley could decrease through traffic in Mission Valley if another onramp to the 805 from the 8 was created.
- DD-286 -Was making Civita a Gated community considered?

- DD-287 | -Was a smaller access road considered instead of a 4 lane major road considered to create traffic calming?
- DD-288 | -The Dog Park in Civita was not mentioned at the intersection of Franklin and Via Alta? -Why was this not discussed? Would it be a sensitive receptor? Will it be safe for people to cross the street with no crosswalks to go to the dog park with dogs?
- DD-289 | -Will it be a safe place to walk dogs and cross the street with 35,000 cars a day?
- DD-289 | -Why were City View Retirement Apartments on Phyllis Place not considered sensitive receptors? Why were they not studied? Will they be? If not why not?
- DD-290 | Why are the 2012 letters included in the DEIR and not the letters that were written in 2016?

- DD-291 | Other Corrections that need to be made to the DEIR. Will they be made?
If not, why not?:
- DD-292 | -Tables say "without connection" but it should say "with connection" as it does in the table.
- DD-292 | -Incorrect labeling on Tables: Delay needs to be labeled in (min) and not left blank or in sec.
- DD-292 | -DEIR Table Labels delay in (sec.), incorrect should be in (mins.) for example page 170 5.2-5, Page 193, Page 206 5.2-21,
- DD-293 | -DEIR Table titles is 'with' and 'without' but only shows 'existing' and 'with', not 'without'.
- DD-294 | -Chart of response times is not clear on where that information came from, seems impossible and could walk in the times stated on the chart.

Thank you for your consideration,

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Subject: Serra Mesa Community Plan Amendment Street Connection

Project No. 265605 SCH No. 2012011048

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Dear Susan Morrison, San Diego City Council Members and Mayor Kevin Faulconer,

The City Council authorized the initiation of a Serra Mesa Community Plan amendment in an October 2008 resolution to include a street connection between Phyllis Place and Mission Valley and analyze whether police and fire response times would be improved with the road connection, whether the road connection could serve as an emergency evacuation route, whether it is feasible to make the road available for emergency access only, and whether the pedestrian and bicycle access would be improved by the street connection. Also, the resolution states that “the initiation of a community plan amendment in no way confers adoption of a plan amendment and City Council is in no way committed to adopt or deny the amendment...” The final decision maker is the City Council.

Conclusion: Police and Fire response times would be slower with connection due to extremely heavy traffic and delays up to 43 minutes to a community that only has one egress and ingress. An emergency route already exists at Kaplan Drive and Aperture Circle in the proposed study area and has been ignored even when evidence was presented at every stage of this EIR. The already existing emergency assess has pedestrian walk ways and bicycle assess, even disability ramps and was not considered nor mentioned at all in this EIR except in letters in Appendix A from 2012. Pedestrian and bicycle assess would not be improved by the proposed project as it already exists and will be expanded by the development of the trail system through the Park on Phyllis Place. The current access and trails will encourage pedestrians and cyclists to use mass transit without vehicular traffic to compete with and the current connections all link to mass transit. The analysis fails to support neither the road connection nor any of the reasons for the community plan amendment and should be denied.

The attached document is my personal letter to the San Diego City Planning Department addressing my comments and questions regarding the Serra Mesa Community Plan Amendment Street Connection Project No. 265605 SCH No. 2012011048. Please address my comments and questions and include in the Final EIR.

I am AGAINST the street Connection and agree with the official Serra Mesa Planning Groups Position Statement AGAINST amending the Serra Mesa Community Plan to include the street connection. This Position Statement was approved at the SMPG meeting on 6/16/2016 and 5/18/2017 to be sent to the City Planning Department with a unanimous vote. SMPG recommends AGAINST amending the Serra Mesa Community Plan to include the street connection. The surveys conducted in the community over the years indicate overwhelming opposition to the street connection. The Serra Mesa Planning Group and members of the community have repeatedly expressed strong opposition to the street connection in writing and in

person at all stages of the development process for Quarry Falls/Civita and continue to express their opposition to the proposed Community Plan Amendment.

I am in opposition of the Franklin Ridge Road connection and the initiative to amend the Serra Mesa community plan to include it. The Connection will increase traffic in Serra Mesa, Mission Valley and I805, making traffic improvements to Mission Valley at the 163, 8 and 15 makes more sense.

The road connection looks promising “in theory,” that is until you read the traffic analysis in the Draft Environmental Impact Report (DEIR). The DEIR analyzed traffic and concluded unmitigable delays at the 805 onramps, 31-43 minutes with the connection versus the alternative of continuing to have less than 15 minute delays without the road connection. According to the DEIR without the connection the favorable conditions will persist even with new developments, under the heaviest traffic times through the year 2035.

A reason for the road is to connect the “unconnected” neighborhoods of Mission Valley and Serra Mesa. Although a quick search on google maps show they are already connected by Mission Center Road in the west and at Mission Village Drive in the east, 2.4 miles (5 minutes) apart on Friars Road. Additionally, there is existing emergency access between Kaplan Drive and Aperture Circle not mentioned in the DEIR. Regardless of the road connection there will be bicycle and pedestrian path connecting Mission Valley to Serra Mesa through the Park South of Phyllis Place. If the connection is approved the road will split the planned park in two parts rendering the space less useable and endangering pedestrians and bicyclists with a busy 4 lane road and intersection instead of a traffic free trail (this safety issue was not mentioned in the DEIR).

All the road connection will do is funnel heavy commercial traffic from Mission Valley and Texas Street up through the new residential neighborhood of Civita onto Phyllis Place in Serra Mesa in order to get to the 805 freeway which cannot support more traffic. To make matters worse Phyllis Place is and will remain the only access road to over 200 low-density residential houses in the Abbots Hill area, effectively ruining the community by slowing emergency services and safe reliable transportation for the residents in the area. Road connections involving this much traffic (34,540 cars per day), should not block a community with only one exit and entrance, it is not appropriate to put this type of infrastructure though a residential community. The 805 needs to be able to be accessed from Texas Street on the south side of Mission Valley and not go through a neighborhood to do it. Infrastructure needs to be improved at Mesa College Drive to allow cars to go north on 805 and 163. Currently to go north cars must go south on I805 and turn around at Phyllis Place because there is not an option for north on either freeway at Mesa College Drive adding to traffic congestion.

The proposed road connection has very few benefits to the residential occupants of Serra Mesa or Mission Valley. In fact the only people that benefit are the developers in Mission Valley whose goal is to have lower impact fees for their new developments. This road connection has been denied multiple times already in 2004, 2005 and 2008 with little change or improvement to the original document. The previous PEIR was funded by \$249,193.54 of taxpayer money, now more with this recirculated DEIR. I would like the city to stop wasting taxpayers’ money

rehashing failed initiatives and use the money to come up with more productive alternatives such as investing in the already approved projects to improve the connection between Friars Road and the 163. The proposed projects will cost the tax payers money increasing the city budget without significantly improving anything. This proposal increases traffic on surrounding roads leaving the city to pay for mitigations that are not recommended. Changing the Mission Valley Community Plan to not include road, would save the city millions of dollars, increase walkability and make both plans consistent, meeting the DEIR objectives.

The proposed road connection does not serve the objectives: street connection does not result in less congestion, improved circulation, improved emergency access, evacuation routes or improve pedestrian and bike access between communities.

Problems with the Connection:

1. Few Significant Delays Without Connection
2. Many Significant Delays With Connection
3. Freeway Delays
4. Ramps Delays
5. Mitigations are not feasible and/or not recommended
6. Contradicts City's General Plan, Mission Valley's Community Plan, Serra Mesa Community Plan and Master Bike Plan, and Master Pedestrian Plan.
7. There are more long term benefits without the road: The DEIR shows a significantly negative impact to Mission Valley and Serra Mesa's roads, noise, and pollution, affecting everyone that travels the I805 from or to Phyllis Place/ Murray Ridge Road.
8. The road connection undermines the pedestrian friendly residential community characteristics of our neighborhoods. See marketing promo video for Civita by Sudberry on youtube posted 12/10/2011 <https://www.youtube.com/watch?v=mM6F8u8RdQY>
9. The connection does not encourage and effectively discourages the use of Mass Transit.

I urge the City of San Diego:

- **Do NOT recommend Serra Mesa Community Plan be amended to include a street connection on the basis that the DEIR does not meet project objectives to improve traffic and shows significant negative impacts on the environment for traffic, noise, and pollution.**
 - Is the DEIR complete and in compliance with CEQA? *No. Alternatives not comprehensive. Information contradictory in multiple locations, fundamentally inadequate and conclusory. Emergency, pedestrian and cyclist access already exists in study area on Kaplan Drive, and more will be provided with trail through the park on Phyllis Place connecting the two communities.*
 - Approve or deny proposed CPA? *Deny. CPA does not meet proposed goals and does not benefit the residents of either community.*
- Recommend that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.

“Project Objectives” of the proposed DEIR and reasons why the proposed CPA does not meet these objectives are as follows, including supporting DATA:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.

~Recommend alternative that Mission Valley revise community plan to exclude the Franklin Ridge Road Connection as multimodal linkage already exists at Mission Center Road and Mission Village Drive and access for cyclists and pedestrians at Kaplan Rd and Phyllis Place. Proposed CPA is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities.

- *This amendment would not resolve the inconsistency between community plans as it also contradicts Mission Valley's Community Plan (page 55) "Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas." The project objectives are not met and in actuality the proposal is less compliant with the City's General Plan and Community plans than the No Project Alternative.*

2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.

- ***~There are 3 times more significant Connection Intersection Condition delays with the road than without; this does not constitute improved local mobility in the Serra Mesa and Mission Valley planning areas. This undermines the pedestrian friendly residential community characteristics of our neighborhoods.***
- Significant Delays With Connection Appendix C 115/310 (page 64)

Intersection	Time	Delay (Min)	Delays with Mitigations
Murray Ridge & Sandroek	PM	58	25
Murray Ridge & I-805 NB Ramp	PM	149	56
Murray Ridge & I-805 SB Ramp	AM	80	21
Murray Ridge & I-805 SB Ramp	PM	404	113
Qualcomm Way & Friars Rd EB Ramp	PM	61	49
Qualcomm Way & Friars Rd WB Ramp	PM	77	41
Via Alta & Franklin Ridge Rd	AM	44	39
Via Alta & Franklin Ridge Rd	PM	96	54

- Significant Delays Without Connection Appendix C 104-105/310 (page 53 & 54)

Mission Center Rd & Murray Ridge Rd/Phyllis Pl AM 57 minutes, PM 117 minutes

-Previous PEIR stated 117 minute delay, in current DEIR 171 minutes is stated; please explain why this number changed or if it is in fact an error.

In the long term all the following 12 study items are better WITHOUT the road connection

**Very significant, within acceptable operation without Connection*

Roadway Segment

1. Phyllis Pl from I-805 SB Ramp to I-805 NB Ramp
2. Rio San Diego from Qualcomm Way to Rio Bonito Way
3. [*Franklin Ridge from Via Alta to Civita](#)
4. [*Phyllis Pl from Franklin Ridge to I-805 SB Ramp](#)

Intersection

5. [Murray Ridge /I-805 SB Ramp](#)
6. [Murray Ridge/I-805 NB Ramp](#)
7. [Murray Ridge/Sandrock](#)
8. [*Franklin Ridge/Phyllis Pl](#)
9. [*Franklin Ridge/Via Alta AM](#)
10. [*Franklin Ridge/Via Alta PM](#)

Freeway Ramp Meter

11. [*I-805 NB Ramp at Murray Ridge Road](#)
12. [*I-805 SB Ramp at Murray Ridge Road](#)

In the long term the following 3 study areas are better WITH the road connection [*Very significant, within acceptable operation with Connection](#)

Intersection

1. Qualcomm Way/Friars Road WB Ramp in PM only
2. [Mission Center /Murray Ridge AM](#)
3. [Mission Center /Murray Ridge PM](#)

Appendix C 88/310 (page 37), Appendix C 100 & 101/310 (page 49 & 50)

3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.

~Proposed CPA does not meet project objectives as the DEIR traffic analysis concluded unmitigable delays at the 805 onramps, 31-43 minutes with the connection versus the alternative of continuing to have less than 15 minute delays without the road connection, even with new developments, under the heaviest traffic times through the year 2035. Long Term (2035) With Connection Conditions Appendix C 112/310 (page 61).

- Freeway

I-805 Freeway Mainline Condition is LOS F (AM & PM) with or without the road connection. I-805 is already heavily impacted and there are no immediate plans to improve the area and in some cases it cannot be improved. “Where a mainline freeway impact is identified on the I-805 mainlines near the Murray Ridge Rd/Phyllis Place interchange no attempt to introduce a new freeway lane for mitigation has been offered, and that impact remains unmitigated.” Appendix C corrected 7/206 previous PEIR, why was this sentence removed? Is it still true for the recirculated DEIR?

- Ramps Conditions Long Term (2035) With Connection Conditions Appendix C 112/310 (page 61).

WITH CONNECTION

- **I-805 NB ramp at Murray Ridge Road – 43 minutes of delay (PM)**
- **I-805 SB ramp at Murray Ridge Road – 31 minutes of delay (PM)**

WITHOUT CONNECTION, all ramps are calculated with less than 15 minutes of delay

4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

~Proposed CPA does not support improved emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas as stated on page 210/432 of DEIR “Consequently, there is limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple ingress or egress routes.”

- Kaplan Drive exists in this study area as an emergency access route and is not mentioned in the DEIR, this omission contradicts numerous pages in the DEIR.

~Proposed CPA does not improve circulation, traffic congestion, and safety for travel including cyclist and pedestrians, or emergency access. Existing conditions are superior to projected Road Connection conditions with corrected information.

5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

~The CPA does not support its conclusion for safe street design although the No Project Alternative meets this objective with existing planned paths without vehicular traffic and lower stress to pedestrians and cyclists while not increasing the traffic as much shown on page 137/310 Appendix C.

- “Based on the environmental analyses within this DEIR, the City has determined that the proposed project would result in significant and unavoidable impacts associated with the following issue area.
 - Transportation and Circulation
 - Result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system
 - Result in a substantial impact on existing or planned transportation systems
 - Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature.” DEIR 399/432
- The proposed CPA states “Mitigation measures are the specific environmental requirements for construction or operation of the proposed project that will be included in the Mitigation Monitoring and Reporting Program and adopted as conditions of approval for the proposed project.” DEIR 119/432.
The DEIR concluded on pages 38-42/432:
 - 6 of the 19 mitigations violate City land use and mobility policies.
 - 8 of the 19 mitigations analyzed assume the mitigations will not occur.
 - 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.”

- All of which are conditions to approval of the CPA and are not recommended.
- Franklin Ridge Road “a four lane collector road including bicycle and pedestrian facilities” to I805 SB is predicted to have 34,540 cars per day, DEIR page 191&205/432. According to Roadway Capacity Standards on page 137/310 (Appendix C) that amount of cars is consistent with a Major Arteria or Prime Arteria not a collector street which Franklin Ridge Road is classified as.
- The CPA includes a class II bike lane which does not protect cyclists from cars like the current plan with a vehicle free bike path going through the park South of Phyllis Place connecting the two communities to the greater San Diego regional bike network, making the proposed CPA not as safe for cyclists as existing plan.
- The proposed CPA would cause road delays of 40-96 minutes increasing traffic on Franklin Ridge Road and limiting mobility by not allowing the community to feel safe to walk drive or ride a bike. Appendix C 92&93/310 (page 41&42)
- The Serra Mesa Community Plan states “There is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers” (45/77 page 37).
- Mission Valley Transportation Plan states “Safety Pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles. 5/10 (page 38)” “Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike. In general, stress levels are high along most roadways in Mission Valley, regardless of the presence of bicycle facilities due to high traffic speeds, the high number of auto travel lanes, as well as the limited space given to the cyclists. 7/10 (page 40)”
https://www.sandiego.gov/sites/default/files/4_transportation.pdf”

* “Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.” This was on last PEIR, why was this objective removed?

~General Plan and Bicycle Master Plan are already implemented without CPA. There is existing interconnectivity between communities by way of Mission Center Road, Mission Village Drive, Kaplan Drive (Emergency, Cyclists and Pedestrians) and Phyllis Place Park that will have a walking and bike path.

- The proposed CPA conflicts with the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities, the proposed increase in traffic decreases safety for pedestrians and cyclists and does not increase connectivity as connectivity is already planned with a trail at connection location.

- Mitigations that are conditions of approval for the proposed project include the removal of bicycle lanes in Serra Mesa in direct contrast to the city's Bicycle Master Plan and environmental progress.

“Roadway Segments

1. Impact TRAF-1: Murray Ridge Road, from Mission Center Road to Pinecrest Avenue
MM-TRAF-1: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Mission Center Road to Pinecrest Avenue to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.
Implementation of this measure would reduce the impact to a level below significance; however, the City’s ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City’s General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, **the impact would remain significant and unavoidable.**” DEIR 186-187/432

For the aforementioned reasons this DEIR is incomplete and not in compliance with CEQA and must be denied. This DEIR does not meet the objectives and shows significant negative impacts on the environment for traffic, noise, and pollution.

- Recommend that Mission Valley revise Community Plan to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts: transportation/circulation, air quality, and noise (operational) in both communities. Will this be done? Please include all information in this discussion of the project objective in the final EIR as it proves and provides evidence supporting the No Project Alternative and must be included per CEQA.

This chart summarizes the major issues that have been described in the body of this letter.

Deficiency	Item/Comment
Omission	Emergency, bike, and pedestrian access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita (Mission Valley). ^{2,3}
Omission	Multifamily units at City View Church are Retirement/Senior housing (sensitive receptors) located less than 400’ from the connection. ^{2,3}
Omission	Mission Valley Community Plan is in the process of being updated; inconsistency could be corrected at this time. ³
Omission	Trail for pedestrians and bicyclists linking Civita and Phyllis Place Park will be provided. ^{1, 3}
Omitted in discussion	Mission Center Road and Mission Village Drive provide a direct link between Serra Mesa and Mission Valley. This was not included in the sections discussing linkages. ³

Deficiency	Item/Comment
Violates City Policies and Goals	<ul style="list-style-type: none"> • Walkable Community and City of Villages^{1, 2, 3} (e.g., impacts on bisected park and roadway connection will increase traffic on Civita local streets). • Fosters auto dependency^{2, 3} (e.g., roadway connection won't encourage mass transit usage).³ • Vehicle congestion relief³ (e.g., bar charts in this letter show an increase in congestion in Serra Mesa and Mission Valley). • Bicycling¹ (e.g., mitigations require bike lane removal)³ • Safe and efficient street design (e.g., safety of bisected park; City View driveway deemed to provide a safety hazard for vehicles entering or exiting at City View)^{2, 3}
Violates Serra Mesa Community Plan	<p>References from SMCP:</p> <ul style="list-style-type: none"> • Street widening and other improvement should be minimized.³ • Safe transportation system with minimal adverse effects.³ • Steep hillside and canyons protected and preserved.³
Traffic Study & Analysis Inadequate; Data may be invalid	<ul style="list-style-type: none"> • Inadequate Traffic Impact Study (traffic counts conducted in 2011; at least 6 consultants involved in collection and analysis).³ • Impact of queuing on residential area not studied (e.g., long term 31 min delay at I-805 SB Ramp PM).³ • Study not comprehensive – Not studied: the adjacent main streets of Serra Mesa (e.g., Greyling Dr), Texas St (a direct thoroughfare), Friars near Qualcomm Stadium.³ • Induced traffic not studied.³ • Not all of the proposed and/or approved projects for Mission Valley are included in the study.³ • If roadway connection not approved, developer will make improvements to Mission Center Rd. These improvements aren't considered in the analyses.³
Air Quality & Noise Analysis Validity	<ul style="list-style-type: none"> • Impacts on sensitive receptors not studied.³ • Air quality and Noise analysis is based on traffic study and will be invalid if the Traffic Impact Study is invalid.³
Contradiction	7% grade stated but approved Quarry Falls EIR indicates a deviation from standards (required when greater than 8%).
Inconsistency	Description of Phyllis Place from Franklin Ridge to I-805 SB ramp described as widening in MM-TRAF-3 and as reconfiguring in MM-TRAF-11.
Mitigation Analysis Inadequate or Infeasible	<ul style="list-style-type: none"> • Detailed description not provided for all mitigations (e.g., Murray Ridge and I-805 NB and SB ramps). • Impact on environment for mitigations not studied/discussed (e.g., land needed for widening of Phyllis Place from two lanes to five lanes).³ • Impact of implementation of mitigations on adjacent streets not studied/discussed (e.g., Raejean, Greyling Dr, etc.).³ • Implementation of 8 of the 19 mitigations would violate City's land use and mobility policies.
Objectives Not Met	Both stated objectives (which aren't the exact same ones as listed in the DPEIR) and City Council's objectives (see references in letter) aren't met.

Deficiency	Item/Comment
Conclusion Not Based on Evidence	Negative aesthetic site of project and substantial alteration to existing or planned character of area considered insignificant. Evidence: park bisected by roadway and ADTs increase from 2,420 (existing) to 34,540 (long term)
Conclusion Not Based on Evidence	The No Build/Remove from Mission Valley Community Plan Alternative was rejected. “This alternative is rejected because it would not meet any of the project objectives...” The conclusion isn’t based on facts: multi-modal linkage exists, trail for pedestrian and bike access will be provided; emergency access exists; increase in congestion if roadway connection built; improvement to Mission Center Rd, if roadway connection not approved; DEIR admits that the roadway connection creates a “safety hazard” for vehicles entering and exiting at the City View Church (not building the roadway connection is a safer design than building it); data supporting contention that the City’s Climate Action Plan and Bicycle Master Plan Update would be inconsistent not provided. This alternative is feasible.
Conclusion Not Based on Evidence	<ul style="list-style-type: none"> • DEIR indicates the alternatives would result in greater impacts associated with transportation and traffic. Cumulative impact bar chart analysis proves the roadway connection results in greater impacts in Serra Mesa. • Many of the mitigations are infeasible. Any analysis using any infeasible mitigation to show a less-than-significant impact is inaccurate.

¹ Refers to Final PEIR for the Quarry Falls Project, dated July 2008

² Refers to Notice of Preparation, Scoping Meeting held in February 2012

³ Refers to Serra Mesa Community Plan Amendment Street Connection: Draft Programmatic Environmental Impact Report, dated 4/15/2016

As indicated in the chart comments were made and submitted during the NOP and the DPEIR timeframe. The corrections weren’t made to this DEIR. This recirculated DEIR is inadequate and many of the mitigation measures are infeasible due to conflicting with the City’s land use and mobility policies and/or cost.

Furthermore, CEQA requires that a project be analyzed and considered without bias. In discussing the No Build/Remove from Mission Valley Community Plan Alternative this statement is made “... the City’s Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended.” (9.4.1.2)

The City knew in 2008 prior to the development of the Climate Action Plan (2015) and the Bicycle Master Plan (2013) that there was a conflict between the Serra Mesa Community Plan and the Mission Valley Community Plan. Yet, they included the roadway connection in the plans, signifying a bias. The bias is indicated in this DEIR with the omission of pertinent facts and in the selection of objectives. These objectives were used to determine the feasibility of alternatives and were used to reject the No Build/Remove from Mission Valley Community Plan alternative.

Objectives

The General Plan and Community Plan Amendment Manual states that “To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given.” City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

Why weren't these objectives, as directed by the City Council, used in the studies and analyses? Will the above information be added to the appropriate sections of the DEIR? If not, provide an explanation for the exclusion.

The objectives that are being used for this recirculated DEIR aren't exactly the same ones that were used in the DPEIR. These are the ones with substantive changes:

DPEIR	Recirculated DEIR	Change
Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa.	Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.	Multi-modal linkage from Friars Road replaces connection from Mission Valley
Amend the Serra Mesa Community Plan to include a street connection from the existing Phyllis Place Road into Mission Valley, that if developed in the future, could: <ul style="list-style-type: none">• Improve the overall circulation network in the Serra Mesa and Mission Valley planning areas.	Improve local mobility in the Serra Mesa and Mission Valley planning areas.	Local mobility replaces overall circulation network
<ul style="list-style-type: none">• Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.		Deleted from the recirculated DEIR

Why were changes made to the objectives?

Was the General Plan and Bicycle Master Plan objective removed because the mitigations would require the removal of bike lanes and this objective would conflict with these plans?

Was overall circulation network removed because the traffic study did not encompass the entire Serra Mesa and Mission Valley planning areas?

The Mission Valley Community Plan states that the connection should be from Stadium Way (Qualcomm Way).

The following objectives weren't listed in City Council Resolution 304297 (October 2008):

- Improve local mobility in the Serra Mesa and Mission Valley planning areas.
- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

What is the source for the objectives not stated in the resolution? Will the source for the objectives be added? If the source isn't added, provide an explanation for the exclusion.

Alternatives

Selection of Objectives: The General Plan and Community Plan Amendment Manual states that "To capture both the list of issues presented to the decision maker as well as those raised in the public hearing discussion, a resolution is prepared to record direction given." City Council Resolution 304297 (October 2008) directed staff to analyze the following issues:

1. Whether police and fire response times would be improved with the road connection.
2. Whether the road connection could serve as an emergency evacuation route.
3. Whether it is feasible to make the road available for emergency access only.
4. Whether pedestrian and bicycle access would be improved by the street connection

If these objectives had been used, as required by the City Council as the project's objectives instead of the objectives selected by staff in the studies and the analyses, what would be the conclusion for each alternative?

Table 9-1. Summary of Significant Effects of the Proposed Project doesn't list: Results in a negative aesthetic site or project and Results in substantial alteration to the existing or planned character of the area. Refer to the discussion in this letter under Visual Effects and Neighborhood Character. The project is a roadway (in general, roadways are not considered a positive aesthetic) creating an increase in ADTs from 2,420 (existing) to 34,540 (long term) on Phyllis Place and bisecting a planned park. The alteration is, permanent and substantially changes the character of the area. This impact is Significant.

Alternatives Considered but Rejected

No Build/Remove from Mission Valley Community Plan Alternative - "This alternative is rejected because it would not meet any of the project objectives..." doesn't consider the following:

1. Resolve Community Plan Inconsistency by Providing Multi-modal Linkages
 - Mission Center Road provides multi-modal linkage from Civita Boulevard to Murray Ridge.
 - A minimum of one trail for pedestrian and bike access will be built between Civita and Phyllis Place Park with or without the road.
 - Pedestrian, bike, and emergency access exists between Aperture Circle in Civita and Kaplan Drive in Serra Mesa.
2. Improve Local Mobility – In addition to the items listed in #1, consideration is not given to the
 - Gridlock that will occur long-term at peak hours on Murray Ridge Road with vehicle accessing I-805. This gridlock will limit the mobility for the 200+ single family dwellings and the 56 retirement homes west of Franklin Ridge.
 - Improvement to Mission Center Rd if roadway connection isn't approved.
3. Alleviate traffic congestion and improve navigational efficiency between Serra Mesa and Mission Valley
 - Options exist with Mission Center Road and Mission Village Drive.
 - Alleviate traffic congestion – Refer to bar chart analysis in this letter that shows the roadway connection for the most part does not alleviate traffic congestion in Serra Mesa and Mission Valley and worsens the congestion in Serra Mesa.
4. Improve Emergency Access and Evacuation – Emergency access exists between Kaplan Drive in Serra Mesa and Aperture Circle in Civita.
5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimize environmental and neighborhood impacts. Under Traffic Hazards (5.2.6) it's stated that "Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (Impact TRAF-19), and mitigation is required."

Also, in this same section is the following comment "However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project." Additionally, it's stated "However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable." (5.2.6.1)

The City's analysis indicates that Franklin Ridge Road will create an unsafe situation that is "significant and unavoidable." Given the situation described by this document, explain how this situation meets the objective to create a safe design and discuss liability issues regarding this unsafe situation. Also, refer to the other sections of this letter that describe environmental and neighborhood impacts.

Explain how these objectives are met when the information described in this response for each objective is considered.

“...For example, the City’s Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended.” (9.4.1.2)

- Cite the reference in the City’s Climate Action Plan that describes this assumption and specifically mentions a roadway connection from Serra Mesa to Mission Valley.
 - Are there other assumptions that were made in the Climate Action Plan that will require additional analysis (e.g., removal of the Regents Road Bridge from University City planning area)?
 - List the other projects that require removal from the plans and the process they went through for removal.
- Cite the reference in the Bicycle Master Plan that describes this assumption. This plan shows a proposed bike path and bike lane in the Franklin Ridge area. There will be a bike path with or without the road. Without the road there will not be a bike lane. What would require updating in the Bicycle Master Plan if the roadway connection wasn’t approved? Proposed doesn’t mean it will happen.
- The Mission Valley Community Plan is in the process of being updated. Will an environmental analysis be needed for this community plan update process? Could the removal of the road connection from the Mission Valley Community Plan be made during this update process?

This alternative meets most of the objectives cited for the project and is feasible. This alternative should have been considered.

Analysis of Alternative 1 - No Project Alternative

Many of the issues that were discussed in the No Build/Remove from Mission Valley Community Plan Alternative section apply to the No Project section.

The analysis doesn’t mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments.

- The Sand and Gravel Re-use Development section (p. 56) states “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” This statement is consistent with the Serra Mesa Community Plan.
- “Franklin Ridge Road should be constructed as a north-south two-lane collector street through Quarry Falls. Class II bike lanes should be provide on both sides of the street. Parking should not be allowed.” (p. 81) The Franklin Ridge Road connection, which would partially run through Civita, is proposed as four lanes and not two lanes, and would be inconsistent with the Mission Valley Community Plan.

Mission Center Road and Mission Village Drive provide multiple linkages between Serra Mesa and Mission Valley. Will this information be added to the analysis and considered in the conclusion? If not, provide an explanation for the exclusion.

“...Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project. Describe the criteria used to reach the “greater” conclusion.

If the inconsistencies in the Mission Valley Community Plan which probably require amendments to the Mission Valley Community Plan and existing linkages that already exist are considered, would the impacts be considered “greater”?

Conclusion – The following information was not included or discussed in this draft EIR: Emergency access exists between Aperture Circle in Civita and Kaplan Drive Serra Mesa, the completed emergency access and sidewalks at Kaplan Drive provides for bicycle and pedestrian access and linkages, the developer will provide a minimum of one trail connection for pedestrians and bikers between Phyllis Place Park and Civita in Mission Valley, and Mission Center Road is a direct route connecting Murray Ridge Road in Serra Mesa to Friars Road in Mission Valley.

- If this information were included and used in the evaluation, what would be the impact on the “No Project” alternative?
- If the issues that staff was required to study as defined in the City Council resolution were considered, what would be the outcome? (Refer to Objectives section of this letter)
- If the mitigable impacts that will probably not be implemented are considered, what would be the outcome?

Air Quality – If an analysis of air quality in the Hye Park condominium complex area is conducted and shows a significant impact without the street connection, will this result be added and discussed? If not, provide an explanation for the exclusion.

The No Project Alternative would meet most of the objectives. Refer to the discussion in this letter for No Build/Remove from Mission Valley Community Plan.

Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

- Land Use – The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.” Why isn’t it mentioned that the Mission Valley Community Plan could be amended and there would be consistency?
- Transportation/Circulation and Parking – Refer to the Transportation/Circulation and Parking section of this letter. Questions are raised about the validity of the Community Access data. If this data is revised, would the conclusion change?
- Relationship to Objectives – Refer to the Objectives section of this letter. If staff were to study the objectives as defined in the City Council resolution, what would be the outcome?

Environmentally Superior Alternative

The conclusion that is reached regarding the “No Project Alternative” is based on an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan and providing circulation linkages between the two communities.

- Linkages already exist with Mission Center Road and Mission Village Drive and the Mission Valley Community Plan contains inconsistencies.
- The Mission Valley Community Plan contains contradictory information (p. 56), “Streets serving new development should be connected to the road network and not to major streets serving residential areas in the mesas.”

Additionally, it’s stated that “...both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project.”

- The studies don't necessarily support this conclusion for the "Alternative 1- No Project Alternative" and "Alternative 2 – Bicycle, Pedestrian, Emergency Access Only Alternative." Also, refer to traffic impacts for all of the intersections identified to operate at LOS E and LOS F (p. 5.2-33).
- With the street connection there is a 43 minute delay at I-805 with the mitigation. The "No Street Connection" shows 15 minute delays on I-805 (Appendix C), which is within the acceptable range in the year 2035. The data doesn't support the analysis that "would result in greater impacts associated with transportation and traffic..." (9.5.3) Will this information be added to this discussion of environmentally superior alternative? If not, provide an explanation for the exclusion.

What would be the conclusion if the linkages and the Mission Valley Community Plan inconsistencies were considered? For discussion, refer to 9.4.1.2

It's stated that "...these impacts would be mitigated to less-than-significant levels under the proposed project." The problem with that statement is that many of the mitigations are infeasible. Refer to the Mitigation section.

The statement is made "Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project." This statement is inaccurate. Traffic will be worse with the project. Refer to the Cumulative Impact Analysis section.

The following are quotes from the DEIR, my comments and questions directly relate to the DEIR, some quotes are from the previous PEIR and the questions still pertain to this recirculated document and still need to be addressed. I am requesting all be addressed per CEQA:

Per CEQA:

"Significant environmental effects that could result if the project is approved and implemented... describe reasonable alternatives to the project (State CEQA Guidelines Section 15121)."

The alternatives are not reasonable and were not explored due to the main focus being amendment of the plan rather than what is better for both communities." Please describe reasonable alternatives to the project per CEQA such as decrease development in Mission Valley. The alternatives in this document do not accurately reflect the underlying goal of the DEIR: to have a road connection. The underlying goal is hidden resulting in narrow focused objectives not allowing exploration of reasonable alternatives per CEQA.

"Based on the environmental analyses within this DEIR, the City has determined that the proposed project would result in significant and unavoidable impacts associated with the following issue area.

- Transportation and Circulation
 - Result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system
 - Result in a substantial impact on existing or planned transportation systems
 - Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature." DEIR 399/432

By not being able to mitigate significant impacts the proposed project is not superior; the reason to amend the plan is to improve traffic circulation and congestion which this DEIR

proves not to be the case. Why would we continue with this project when the objectives are not met?

“Mitigation measures are proposed to reduce Project impacts, however, not to below a level of significance.”

Therefore the project does not meet proposed goals and money should be spent improving the 8, 163 and 15 entrances to improve traffic circulation and congestion as the 805 is backed up already and will continue to be if more access is created by this connection. Why not spend money (ex. impact fees) on freeways that are not at LOS: F during rush hour?

Page 171/432

“The Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity. No new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition”

False, there is already connectivity between the two communities at Mission Center Road and Mission Village Drive as well as Kapan Drive and Aperture Circle, along with trails and Handicap access. Is waiting time affecting gas mileage and emissions considered in VMTs. Is neighborhood character and density considered in VMTs? Will it be? If not why not? If VMTs are supposed to be more environmentally friendly is waiting in traffic more environmentally friendly then driving slightly further? Explain.

Page 193/432

“As shown in Table 5.2-17, the proposed project would cause a significant long-term cumulative impact on the following four study area intersections.

λ Murray Ridge Road and Sandrock Road (LOS E, PM peak hour) (Impact TRAF-14)

λ Murray Ridge Road and I-805 NB ramps (LOS F, PM peak hour) (Impact TRAF-15)

λ Murray Ridge Road and I-805 SB ramps (LOS E and F, AM and PM peak hour, respectively) (Impact TRAF-16)

λ Via Alta and Franklin Ridge Road (PM peak hour) (Impact TRAF-17)”

Explain how VMTs are more important than these impacts?

Page 197/432

“As shown in Table 5.2-18, all metered on-ramps within the project study area are projected to operate with fewer than 15 minutes of delay with the exception of the following during the PM peak hour.

λ I-805 SB on-ramp at Murray Ridge Road (31 minutes of delay) (Impact TRAF-18) Based on the criteria outlined in Table 5.2-9, the proposed project would cause a significant direct impact on this metered freeway on-ramp.”

Where is the 43 minute delay that is mentioned in other place in the DEIR, will it be added on page 197/432? If not why not?

Page 200/432

“With the proposed project, VMT within the study area would be 720,196, a 1.8 percent decrease in VMT when compared to the baseline condition in Year 2035. Region-wide, the VMT with the project would be 1,629,137, a 0.28 percent decrease compared to the baseline condition in Year 2035. Therefore, as the proposed project would reduce VMT within the study area and the region, impacts would be less than significant. Significance of Impacts Based on the City’s significance thresholds outlined in Table 5.2-9, the proposed project would result in significant direct impacts on four roadway segments, three intersections, and one metered freeway on-ramp during the Long-Term scenario.”

Why do reduced VMTs correlate to impacts being less than significant? The table below from page 200 are significant impacts are why the proposed project should be denied. Please explain why VMTs are more important than these impacts?

Page 200/432

“Table: Roadway Segments

- λ Franklin Ridge Road, from Via Alta to Civita Boulevard (Impact TRAF-8)
- λ Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (Impact TRAF-9)
- λ Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (Impact TRAF-10)
- λ Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (Impact TRAF-11)
- λ Phyllis Place, from I-805 SB ramps to I-805 NB ramps (Impact TRAF-12)
- λ Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (Impact TRAF-13)

Intersections

- λ Murray Ridge Road and Sandrock Road (Impact TRAF-14)
- λ Murray Ridge Road and I-805 NB ramps (Impact TRAF-15)
- λ Murray Ridge Road and I-805 SB ramps (Impact TRAF-16)
- λ Via Alta and Franklin Ridge Road (Impact TRAF-17) Freeway Ramp Meters
- λ I-805 SB on-ramp at Murray Ridge Road (Impact TRAF-18)”

These significant impacts are why the proposed project should be denied. Please explain why VMTs are more important than these impacts?

Page 207/432

Table shows 31 min delay would be gone with mitigation but it is not possible to mitigate so how can delay be shown mitigatable when it cannot be done? Remove that the delay would be gone with mitigation because it cannot be mitigated.

Page 231/432

“The proposed project’s traffic report (Appendix C) evaluated the level of service (LOS) (i.e., increased congestion) impacts at the intersections affected by the proposed project.”

The DEIR did not evaluate VMT directly and used old data. The goal was to relieve congestion not VMT, VMT does not relieve congestion or environmental impact of traffic if waiting in congestion for long periods there is no benefit to go a shorter distance. Please explain why VMT is a good measure to determine significance verse LOS?

Page 328/432

“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.”

This is relevant to the general plan and contradicts the proposed project as Abbots Hill is a closed looped sub-division and the layout is dictated by the topography. The proposed road location is dangerous and will negatively affect all areas around proposed connection.

Page 343/432

“City of San Diego Climate Action Plan In December 2015, the City adopted its CAP, which identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual (BAU) projection for emissions at 2020 and 2035, State targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.”

How do VMT's fit with the Climate Action Plan? Explain how VMT's relate to emissions when waiting in traffic.

Page 348/432

Table 5.10-4 shows a negligible benefit of road connection in terms of VMTs. VMT does not correlate to anything with greenhouse gases as LOS would increase time on the roadways increasing gases. Please explain why VMTs are a good metric?

Page 417/432

“It would not decrease VMT within the study area or region and thus would result in a significant and unavoidable impact on freeway mainline segments. The Bicycle, Pedestrian, and Emergency Access Only Alternative would not result in any traffic hazards and would provide a connection for alternative transportation users, including cyclists and pedestrians. Overall, this alternative would result in slightly greater impacts compared to the proposed project as it would not decrease VMT and impacts would similarly be significant and unavoidable.”

VMT do not correlate directly with freeway mainline segments and therefore should not be used to determine that impacts would be similar. Please explain how VMTs create similar impacts and elaborate on environmental impacts specifically emissions and waiting in traffic verse longer VMTs in less traffic.

“Both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region.”

True they would not decrease VMT, but if you have to wait in traffic for 43 minutes wouldn't that be worse for the environment and have a more significant impact then driving an extra 0.3 miles to go up Mission Center Road instead? Will this be studies if not why not? City and Highway gas mileage is significantly different because of time spent idling will this be taken into account as more important and significant than VMT? If not why not?

Page 420/432

“However, because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative.”

Since the no project alternative is superior will the proposed project be rejected, if not, why not?

For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative. This alternative would slightly reduce impacts associated with construction (i.e., biological resources, historical and tribal cultural resources) due to the narrower roadway and shorter duration of construction. It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.”

This is not true and just because VMTs will not be reduced with alternatives does not mean that alternatives are not superior for other reasons as the alternatives meet most of the other objectives. The significant and unavoidable impacts of the proposed project are so detrimental to the environment and the affected communities that the alternatives are far superior. Please correct false logic as VMTs do not determine superiority by themselves.

The No Project Alternative allows Bicycle, Pedestrian, and Emergency Access that currently exists and is in compliance with the General Plan, Serra Mesa Plan and Bike Master Plan. There is intercommunity connectivity at Mission Center Road and Mission Village Drive. There is bike and emergency access at Kaplan Drive and Aperture Circle connecting Civita and Abbotts Hill neighborhoods. There will be a trail that will connect Serra Mesa and Mission Valley directly onto the Master Bike Paths in the city. A trail is safer and more heavily used by cyclists and pedestrians than a road with vehicular traffic. A trail also increases the use of Mass Transportation/ Transit. There are letters in Appendix A stating the existence of Emergency Access at Kaplan Drive so why was it not included in the study? Will it be corrected? If not, why not?

Amending the Mission Valley Plan to align with the Serra Mesa Plan will completely solve the plan inconsistencies and the project objectives are already met with the current connections in existence. Explain the impacts of amending the Mission Valley Community Plan with the corrected information about emergency access and bike and pedestrian access with the Park as this should have been researched further to be compliant with CEQA.

There will already be a park with bike and pedestrian access and there is already existing emergency access at Kaplan Drive, almost half the mitigations are not recommended yet doing all mitigations is a condition of approval. All General and Community Plans support future development increasing mass transportation instead of vehicular traffic. The proposed project would meet the goal of aligning the two community plans that goal is not an environmental goal and is not environmentally superior as the Mission Valley Plan could be amended to not include the connection for far less money and environmental impacts than the proposed plan. In fact if the money for this project was spent on improving onramps to surrounding freeways the goal of decreasing Mission Valley traffic and congestion could be achieved, will this be studied, if not why not?

Alternatively there is an unnamed road on the East side of the 805 off of Friars Road that could be expanded or paralleled as it is very close to the 805 with no residences nearby. Could this area be a better alternative for the proposed CPA? Why was this alternative not studied as required by CEQA? Will it be studied? There are no residences on the unnamed road North off Friars parallel to the 805. Connection to the 805 from this road would solve the inconsistencies between plans and not impact the residence of Civita or Serra Mesa as much as well as be consistent with Plans. Will this be considered?

Page 407/432

9.4.1.2 No Build/Remove from Mission Valley Community Plan Alternative

“1. This alternative would resolve the inconsistency between community plans; however, it would not provide a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, as no roadway would be constructed, thereby limiting multi-modal options between these roadways. Therefore, it would not fully meet this objective.”

False, multi-modal linkage already exists at Kaplan Drive and the trails on Phyllis Place linking Friars Rd to Phyllis Place neighborhoods meeting this objective. This allows from pedestrians, cyclists and emergency vehicles’. In addition the two communities are also linkages at Mission Center Road and Mission Village Drive. Please explain how the objective is not already met?

Page 408/432

“2. This alternative would not improve local mobility in the Serra Mesa and Mission Valley planning areas, as no roadway would be constructed, thereby limiting routes between these planning areas.”

Explain hoe local mobility doesn’t already exist and meet the General and Master Bike Plans of the City by encouraging the use of mass transportation and no vehicular travel?

“3. This alternative would not help to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, as no roadway would be constructed, thus limiting access options for those in the areas within the vicinity of the project site.”

Explain how this option would not alleviate traffic congestion as multi-modal routes of transportation such as the pedestrian and bicycle paths would decrease the use of vehicular use and decrease traffic congestion. Will this be studied if not why not?

“ 4. This alternative would also not improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, as it would not provide additional ingress/egress for emergency responders, nor would an additional emergency evacuation route be created.”

Blatantly FALSE, there is an already emergency access route at Kaplan Drive and Aperture Circle that currently exist between the two communities in the study area. This connection has been known about since at least 2012 as mentioned in Appendix A, why does this emergency access route continue to be ignored? The two communities already have emergency access that is less congested and faster responding then if there were thousands more cars to compete with between the two neighborhoods. Also most of those cars would not be in the interest of connecting the two communities and would only be to access an already failing I805, not benefiting linking the communities at all. Please explain how the proposed link will improve access with increased traffic?

“ 5. Finally, this alternative would not provide a safe and efficient street design for motorists, cyclists, and pedestrians, as no roadway would be constructed. Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency

with other land use plans that have already been adopted. For example, the City's Climate Action Plan and Bicycle Master Plan Update include the proposed roadway connection in their assumptions."

Please explain how a road without vehicular traffic would not benefit cyclists and pedestrians making a safe and efficient street design? Where is this studied? Just because other plans have been updated to include this connection does not mean it has to be done or other plans cannot be changed. Will other plans be updated to not include connection because it has been shown to not be the environmentally superior option? Completing the road project should not be done just because it is in other plans. This logic is circular and should not be used to justify not removing the connection in the Mission Valley Plan. Will this be removed as a reason Mission Valley's plan can't be the one to be amended? If not why not? Give examples of why it is justifiable to not amend Mission Valley's Plan. This DEIR was not instructed to look at inconsistencies with other land use plans, only the inconsistency between Mission Valley and Serra Mesa, explain why these other plans cannot be changed?

Why not amend the Mission Valley's Plan not to include connection instead? The CPA does not show less congestion and improved circulation or improvement to emergency access and evacuation route but rather the opposite. Prove where in the data it shows otherwise if incorrect. Mission Center Road might have less cars traveling on it but would still back up further with traffic congestion because of the 25,000 more cars trying to get on the 805 from Franklin Ridge Road. Prove otherwise.

"The City's General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for the establishment of effective mobility networks to effectively move workers and residents." **This goal of the General Plan would be met with the No Project Alternative as workers and residents have effective mobility networks through mass transportation designed for the Mission Valley area and use alternative modes of transportation such as walking and biking to effectively move workers and residents. Please explain and give proof of how transit and paths would not comply in current state without proposed project. How does the proposed CPA prove effective mobility networks based on proposed traffic delays of up to 43 minutes? Appendix C states the delays without connection would be acceptable under 15 minutes. Based on this contradiction please remove all blanket statements that the proposed CPA will improve mobility networks and replace with the truth as proven by the numbers in Appendix C that it will not be better than the No Project Alternative. VMT may be improved but that it not a good measure of climate improvement nor traffic congestion, prove otherwise or remove statement that VMT is an reason to approve project.**

"Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network."

The No Project Alternative and the Bicycle, Pedestrian, and Emergency Access Only Alternative will encourage this interconnectivity of the pedestrian network and specifically establish a more effective mobility network. Can interconnectivity be accomplished by a pedestrian/bike only that is currently planned? Explain why a vehicular road is required to accomplish interconnectivity?

Prove that the proposed plan would alleviate traffic congestion because it is not proven by the data. VMT would only matter if the speed and grade of the roads are similar. In this case the road connection is a much steeper grade and studied to slow traffic in some cases up to 43 minutes increasing gas demand and increasing emissions based on time to travel the same distance. Please prove otherwise.

Page 34/432

"Project Objectives

The City has identified the following objectives for the proposed project:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. "

Multi-modal linkage already exists within the residential area west of Phyllis Place on Kaplan Drive and trails will link directly to Phyllis Place from Friars. Why was this link not considered already? Will it be? If not why not?

"2. Improve local mobility in the Serra Mesa and Mission Valley planning areas."

How would a road be better than a path without vehicle traffic, improving local mobility, walkability, traffic and pollution? How many vehicles will be local traffic and how many will be not local with this road connection? Local mobility will be improved without a road because locals can safely walk and ride bicycle between the two communities. Explain how the CPA will improve 'local' mobility?

"3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas."

How does a 43 min delay alleviate congestion? What is the delay without the road connection? Is bringing non local traffic through a residential neighborhood really improving navigational efficiency? Is it appropriate to use VMT if the shortest distance is on small residential streets endangering the residents not alleviating the residential traffic but adding to it? Please explain logic to using VMT to justify road connection to a major freeway through a local community.

"4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas."

Emergency access already exists within the residential area west of Phyllis Place on Kaplan Drive, how would increasing vehicle traffic improve access?

"5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts."

How would it be safer with vehicle traffic verse just a path with no vehicles?

"• Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities."

Why was this objective taken out of the recirculated DEIR? Is it no longer important to implement the General and Bicycle Plan? Please explain.

Where is it discussed that the deviations from the General Plan and Master Bike Plan are justified and acceptable as required by CEQA? The mitigations are not recommended, how is it acceptable and justified to continue with a project that is not recommended?

Traffic is less impacted with the No Project Alternative as proved by the traffic studies in Appendix C. Emergency access will be slowed with increased traffic and it will not be safe for pedestrians and cyclists with increase road traffic in Civita or Serra Mesa. Please remove false statement or prove conclusion otherwise with supporting accurate data.

Goals of the General Plan are already met. Resolving the inconsistency in the two community plans can be done with an amendment to Mission Valley's Plan. It is environmentally superior to encourage biking and walking over driving in every respect decreasing traffic congestion and increasing efficiency. Is this true? Please prove otherwise.

The alternative of amending the Mission Valley Plan and alternative routes to connect Friars to the I805 were not given appropriate consideration based on CEQA guidelines and need to be accurately vetted for environmental impacts in light of omitted information, will this be done? If not why not? Please explain reasoning.

Alternatives would solve most of the problems and mitigate significant impacts.

393-394/432

"It is not anticipated that this project would result in the development of additional growth inducing projects as there is not much vacant, developable land within the project vicinity, and the Serra Mesa Community Plan designates most of the surrounding area as low density. Furthermore, the proposed project would not provide roadway access to an area that was wholly inaccessible (e.g., a roadway to a rural area from a highway). As previously detailed, the proposed project intends to connect existing urban communities and provide additional options within the transportation network. Impacts would therefore be less than significant."

Completely False, there is a huge amount of developable land in the project vicinity at Qualcomm Stadium. This linkage would be used by all the new High-density developments in Mission Valley funneling traffic through residential streets and 'low density housing' to get to a major "highway" I805. The roadway access directly blocks the entire community of over 200 homes in Abbots Hills area in a low density area with all the traffic of an urban area coming out on the only road that is the ingress and egress to the entire neighborhood. Making the neighborhood inaccessible to the residence that live in the neighborhood, blocked in or out by traffic getting to a highway. There are no restaurants or business in Serra Mesa at this connection and all retail must be accessed by crossing the bridge over I805 to where the other connection points already exist between neighborhoods, therefore the connection is only for access to the highway and not to link the local communities. Serra Mesa is not urban and much lower density than Mission Valley the impacts would be incredibly significant and destroy the communities. Please correct inaccurate information as most of the previous quote is not true. Please explain the validity in each sentence of the paragraph and show documentation to support conclusions.

"Population, health and safety, public services and facilities, and public utilities"

The effects to population in the CIVITA and Abbots Hill Area, just to name a few, would be directly affected and affects would be very significant. If a project is compatible with the

community plan the project does not have to be presented to the community planning group because it is already in agreement with the proposed plan. By amending the Serra Mesa Plan a road could be approve in the future and would not be required to be presented to the Serra Mesa Planning Group because it would be a statutory element in the Plan, the community would no longer be able to voice opposition. The connection change in the Community Plan may seem minor but directly affects the public's ability to have a voice and the connection once implemented would be disastrous for multiple communities. Sole egress and ingress would be slowed by a predicted 43 minutes, resulting in delayed evacuation and emergency services. Therefore any statements that the proposed CPA is not significant are false and must be removed unless further proof is offered to the contrary.

The DEIR is available for review by members of the public and public agencies to provide comments on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project might be avoided or mitigated.

This document has not been sufficient in identifying and analyzing the possible impacts on the environment or the ways effects might be avoided. There are existing conditions such as Kaplan drive that were not mentioned at all and this very omission is enough to change conclusions that support the connection. There are impacts to neighborhoods and traffic that are not mentioned. Negative impacts on circulation and emergency access were not addressed. What are the effects on circulation and emergency access when the delay for the freeway will be 43 minutes? Will emergency vehicles be able to get through the traffic and save someone's life? Will a private citizen be able to drive themselves to the hospital with delays of 43 minutes? Will residents be able to sleep with cars traveling by their house every 3 seconds as predicted in the traffic section of this DEIR, when their bedroom window is 10 feet from the road? Can children safely walk to school on Via Alta when there is only 1 cross walk and a car passing by every 3 seconds on average and most likely more often during school hours? Please address all these concerns in details and prove evidence that they were studied to be in compliance with CEQA.

Page 34/432

"Project Description, a portion of the Phyllis Place Park is located within the project site. The linear park would run along the south side of Phyllis Place. There are two approved general development plans for the park—one with the roadway connection and one without."

Proposed plan will split this park in two and add vehicles, pedestrian and cyclist in the middle of the park where pedestrians and cyclists would have had paths will be traffic? Will children be able to kick a soccer ball on half a park? Is the park even worth using if it is divided by a 4 lane Major Artery Road? Was this considered? Will it be? Does it matter? Please explain.

Why was the park not considered in coming to a conclusion on land use?

"The State of California requires each city to have a general plan to guide its future and mandates that the plan be updated periodically to ensure relevance and utility."

Plans should be changed to ensure relevance and utility. The proposed CPA is not irrelevant and nonutility as proved by the traffic study and therefore must be updated by California Law. Serra Mesa's Plan does not include Industrial uses of land as Mission

Valley does. Therefore traffic from and to Industrial areas should not travel through residential neighborhoods of communities that do not contain industrial areas. Why was this not studied? Will it be included? Explain.

Page 121/432

"The project site has a General Plan land use category of Residential. As previously described, the project site is within the Serra Mesa and Mission Valley community plan areas. The Serra Mesa Community Plan designates the project site as "Low-Density Residential." Within the Mission Valley portion, the project site is within the Quarry Falls Specific Plan area, which is designated as MultiUse under the Mission Valley Community Plan."

This Low-Density Residential area is only supported by one small road, the proposed CPA would endanger the safety and wellbeing of the entire neighborhood. Please update and study this information as it would be hazardous to the entire community to be blocked in by the proposed traffic on Phyllis Place, Via Alta and Franklin Ridge Road. It would not alleviate traffic and the additional connection would not benefit the community. Will this information be included in the DEIR? If not, why not?

Page 85/432

"2.3.3 Existing Pedestrian and Bicycle Circulation Network

The Quarry Falls project also included the provision of a network of publicly accessible trails and pedestrian amenities "to tie together the various open space, parks, recreation, and community activities" (page 3-17 of the Quarry Falls PEIR). A Park Trail was proposed that would traverse the Quarry Falls site from north to south...The pedestrian trail system, in conjunction with the street network, is proposed to serve pedestrians and bicyclists. In addition, the proposed Phyllis Place Park is a passive-use park that includes a decomposed granite pathway for pedestrians along the south side of Phyllis Place."

Thank you for mentioning this trail, but why is this trail not considered in the determination of pedestrian and cyclist access? This supports the No Project Alternative for reasons of connections already existing? Why was this trail not mentioned when coming to a conclusion? Why was the trail not considered access for pedestrians and cyclists without the connection? This quote proves that access will already exist. Conclusions stating that the proposed project will increase or improve access must be removed because access already exists and will be safer and increase mobility without vehicles sharing the road.

Page 131/432

"BICYCLE MASTER PLAN

The City's Bicycle Master Plan Update proposes Class II (Bike Lane) facilities along Phyllis Place with a connection to Via Alta, Franklin Ridge Road, and Civita Boulevard. The Class II Bike Lane is shown connecting north toward Phyllis Place and across I-805 to Murray Ridge Road. It is also shown connecting to Friars Road from two points on the south from Civita Boulevard."

Class I Bike lanes are what will go in if this CPA is not approved. Proving that the Master Bike Plan will be met without the road connection and it will be safer without vehicular traffic. Why can't goals of the Bicycle Master Plan be accomplished with the No Project Alternative? Doesn't the No Project Alternative include a trail through the park that will be connected to the Master Bike Network? There is also sidewalks and Bicycle access that was not mentioned in the DEIR on Kaplan drive in the study area including handicap compliance.

Pages 38-42/432

“6 of the 19 mitigations violate City land use and mobility policies.

8 of the 19 mitigations analyzed assume the mitigations will not occur.

10 of the 19 mitigations which are conditions of approval would remain Significant and Unavoidable.”

This justifies the conclusion that the No Project Alternative is superior and the CPA should be rejected! Would it be fiscally or environmentally responsible to approve such a project given the significant unavoidable problems? Please explain why such a project would be allowed to proceed?

Page 121/317

“Zoning

Currently zoned by the City’s Municipal Code: RS-1-7, which is for single-family residential use (minimum of 5,000- square-foot lots).”

Does the proposed CPA fit current zoning? Does a road with 35,000 cars a day belong in a single family use zone? Explain.

“Regional Air Quality Plan”

Proposed CPA does not fit current Quality but would with alternatives to the project. Why was this not mentioned as an impact?

“Background”

The proposed CPA will not result in less congestion or improved circulation, emergency access or evacuation routes as proven by the DEIR data results, in fact it will do the opposite on all accounts. The project was evaluated and has proven to have significant negative impacts on traffic and circulation and therefore must not be enacted. As the very reason for study (road connection) was proven to not be feasible, approving this plan would endanger lives and not be any benefit for the communities it was intended to help. Please do not waste any more tax dollars rehashing failed initiatives that have been proven time and time again to not be the correct course of action. Will this be included in the final DEIR? If not, why not?

“The City’s General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for the establishment of effective mobility networks to effectively move workers and residents. Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network.”

This can be done with alternative options. Per CEQA reasonable alternatives must be considered and Mass Transportation/Transit, walking and cycling are alternatives that would meet the City’s General Plan Land Use Element, why was this not discussed? Will it be? If not, why not?

Page 107/432

“3.3.1 Proposed Roadway

The City of San Diego’s Street Design Manual (2002) contains guidelines for the physical design of roadways. The guidelines consider the needs of all users of the public right-of-way. The manual includes provisions for street trees and traffic calming, offers pedestrian design guidelines, and discusses how to

create streets that are important public places. The proposed project has been conceptually designed to be consistent with the Street Design Manual.”

Considering all users of the public right-of-way would be considering the resident of Abbotts Hill and Civita, both in opposition to the connection because it would put major artery traffic in a residential neighborhood destroying the characteristics of the walkable community they bought into. Over the years Serra Mesa has put in many traffic calming measures such as narrowing the road on Mission Center Road and Murry Ridge Road, this CPA would completely undo the measures recently put in place to calm traffic and would directly increase traffic as a result. Explain how this CPA meets the guidelines of roadways given this information. Phyllis Place and the Park overlooking CIVITA is an important public place and needs to be considered as such.

“A major street is defined by the manual as: A street that primarily provides a network connecting vehicles and transit to other major streets and primary arterials, and to the freeway system, and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement.

The proposed roadway would be 460 feet long and classified as a four-lane major street...

λ Design speed: 55 miles per hour”

The major street in this CPA will be connected to 2 lane residential roads in direct contracts to how major streets are defined. There is no commercial or industrial property to carry the heavy traffic from this road to, therefore it is inappropriate to make a major street just to access a freeway system that is already at max capacity. This CPA is in direct conflict with the Mission Valley Plan that states “*Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.*” The Street connection is not included in Mission Valley Facilities Financing Plan and would be contrary to the plan by connecting a road to major arterials through residential neighborhoods of CIVITA and affecting the residential road of Phyllis Place zoned for low density residential housing. The proposed CPA is at the expense of significant impact. The traffic can be mitigated by investing in infrastructure that is currently inadequate such as onramps to 8, 163 and 15 freeways as 805 is already heavily impacted without the possibility of resolve, limited by canyons not allowing expansion. Phyllis Place cannot handle traffic increasing to overcapacity which will occur with approval of CPA. Phyllis Place will instantly become an LOS of F as soon as the road connection is made, how is this consistent with the Mission Valley Community Plan? How does LOS: F increase circulation and efficiency? Explain how it is responsible to support an CPA that will cripple the local neighborhood.

The CIVITA site was only allowed to be built with higher density because of its proximity to mass transportation/transit. The CIVITA cite is approved to be built with or without the connection as it is not dependent on the proposed CPA. Adding the connection would endanger the residence of CIVITA and contradict the bases for its allowed density. The people of CIVITA do not want this connection and want what they bought into “A walking and cycling friendly neighborhood.” The proposed CPA undermines the availability of Mass Transportation/Transit and relies on vehicular traffic to provide access to CIVITA rather than safe paths for walking and cycling.

It is required by CEQA that this alternative be explored and required to prove if any of the objectives are met in doing so. If due diligence was done the alternative of amending the Mission Valley Plan to not include the connection would be superior based on the analysis of DEIR in the appendix. This alternative needs explored further to be in compliance. Will it be, if not why not?

The proposed CPA has more negative impacts than in the original Quarry Falls EIR. The proposed connection was not approved in the Quarry Falls EIR because of negative environmental impacts and with increased impacts should continue to not be approved. The proposed CPA is not in the best interest of the communities it impacts and therefore should be denied. Why would the DEIR to amend the Serra Mesa Community Plan be supported when the eventual road connections EIRs have been denied over and over because they have not proven beneficial? Does this prove that the connection should be denied based on the road connection being denied for negative impacts in the past? Why amend a plan to include a connection that has been proven negative many times in the past and is even worse now? Will the connection lower Development Impact Fees for new developments and businesses in Mission Valley? Will the approved CPA decrease money that could be used to update existing infrastructures? Does this project give businesses a way out of paying for impacts caused by increased traffic from their businesses and developments? Will needed repairs to other infrastructure such as 8, 163, and 15 onramps be postponed or not funded as a result of this connection?

If the city finds that the street connection has significant impacts will it still be implemented? Will the community plan in Serra Mesa and Mission Valley both need amended again because the road connection is found not safe when studied again (as been found in the past) and will not help circulation and traffic?

Who will fund the construction of the road project?

Who will fund the mitigations?

What is the total cost of the road construction and the mitigations?

How will the money be spent if it is not spent on this project?

Will more taxes be collected to pay for this project?

What other projects will not be done if the proposed project is funded instead?

The impacts that have been studied show significant unavoidable impacts. If a Site Development Permit were requested, would it be denied? If so would amending the Mission Valley Plan to remove the connection be best for both communities to achieve consistency? The CIVITA developer has publicly stated that if the connection were approved Sudberry Properties would fund and pay for the road to be implemented. This is contradictory to the statement that there is “no forthcoming specific proposal to build the road” will this be corrected? If not why not?

“To analyze consistency with City of San Diego (City) planning documents and policies, research into each applicable plan and policy was conducted, including the City of San Diego General Plan (City of San Diego 2008, 2010a), Serra Mesa Community Plan (City of San Diego 2011a), Mission Valley Community Plan (City of San Diego 2013a), and the City of San Diego Bicycle Master Plan (City of San Diego 2013). Analysis included a review of all elements in

each plan.” **The City’s General Plan Land Use Element (City of San Diego 2008) identifies a policy calling for “the establishment of effective mobility networks to effectively move workers and residents... Result in less congestion and improved circulation... Additionally, the Mobility Element presents several policies calling for interconnectivity of the pedestrian network.”** **The walking and bicycle paths that are in the existing CIVITA plan and Kaplan Drive connect the two communities of Serra Mesa and Mission Valley and will achieve this mobility element and encourage intercommunity connectivity; much more than vehicular roadways being primarily used by other communities as access to freeways and not to participate in community activities in adjacent communities. Please explain why this is not included in the DEIR?**

Currently the CPA is located in a Low-Density Residential. Is Low-Density Residential considered an Urban setting? There is only one road entering and exiting an entire community not able to support city traffic is this Urban? If not please address the contradiction with the statement in DEIR that agrees with the actual land use for the proposed CPA of a low-density residential area. Will it be changed?

The City of San Diego General Plan is periodically revised and could be revised again to not include the connection as it endangers residents and does not relieve traffic congestion as intended. Is the proposed connection on the map in the General Plan? If not, does this mean the Mission Valley Plan contradicts all other plans and should be changed? This connection has caused contention for decades and it would be nice to no longer waste any more time and money rehashing failed initiatives. Please spend the money and time of the City Council correcting problems that already exist instead of creating new problems.

“Land Use and Community Planning Element: The purpose of this element is to guide future growth and development into a sustainable citywide development pattern while maintaining or enhancing quality of life.”

The purpose of the General plan is to enhance quality of life and this connection will not enhance quality of life for the Serra Mesa Community or any others. Why was quality of life not discussed as it pertains to the purpose of the General Plan?

“Mobility Element: This element strives to improve mobility in the City by providing policies that support a balanced, multimodal transportation network while minimizing environmental and neighborhood impacts. The element contains policies that help make walking more viable for short trips, and addresses various other transportation choices in a manner that strengthens the City of Villages land use vision and helps to achieve a sustainable environment.”

The general plan strives to minimize environmental and neighborhood impact, in order to be complaint with this element the road connection must be denied. As the connection has serious environmental impacts and those would be lessened by the No Project Alternative. The city’s General Plan also strives to make walking more viable which is in support of the trail only through the Park south of Phyllis Place. To strengthen the City Village of Serra Mesa and CIVITA the road must not be connected and trails should be the focus to achieve a sustainable environment. Why is this aspect of the general plan not discussed in the section of comparing Plans? Will it be discussed?

Page 57/317 “City of San Diego Bicycle Master Plan

Although not identified in the Bicycle Master Plan, the proposed CPA would allow bicycle lanes in either direction, connecting the Serra Mesa Community to the Civita mixed-use site via bicycle. This inclusion of bicycle infrastructure supports goals and policies presented in the Bicycle Master Plan.”

The previous PEIR stated that this CPA was not in the Bicycle Master Plan, is it now in the Bicycle Master Plan? Why was the trail through the Phyllis Place Park not addressed in relating to the Bike Master Plan? The current plan of a trail is stated to be a good idea and would be better without vehicular traffic per the Mission Valley Plan on page 40 “4.4 BICYCLE NEEDS...Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike.”

Further proof in DEIR and in Appendix C “Another alternative for consideration involves a pedestrian and bicycle only path should there be no public road connection via Franklin Ridge Road to Phyllis Place. Were there not to be a roadway connection there would at least be some public pedestrian and bicycle path system for those users to get between the two communities even if vehicles could not make that connection.”

Was the current plan included in the DEIR as it would need to be in order to be in compliance with CEQA? Will this information be added? If not, why not?

“The CPA area is designated as Low-Density Residential in the Serra Mesa Community Plan (City of San Diego 2011a)

The Quarry Falls Specific Plan’s land use design and circulation plan does not include a road connection north to Phyllis Place.”

If there is no plan to include the road connection in Quarry Falls Specific Plan why would Serra Mesa’s Plan need changed to meet a plan that does not exist? Seems faulty that the basis of this DEIR is to create consistency and the more plans that are included the less consistent the proposed project becomes. Will the proposed CPA be withdrawn and not be brought up again? How can it be ensured that it will not be brought up again?

“The Mission Valley Community Plan recommends providing a street connection between Friars Road and Phyllis Place, and although such a connection is currently not in the Serra Mesa Community Plan, the proposed CPA would resolve the conflict between the two community plans.”

The Mission Valley plan only recommends a street connection yet does not require a connection. After research in this DEIR has found the connection to have significant impact to traffic, will the recommendation of the connection be taken out of the Mission Valley Plan as it is now in a Plan Update?

Page 134/432

“5.1.3 Significance Determination Thresholds

2. Result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located.”

The proposed project would be in conflict with the recommendation of the current community plan as the propose CPA is suitable for low-density not Industrial and high-density traffic. Will this be addressed in the DEIR? If not why not?

“The Serra Mesa Community Plan has designated the south side of Phyllis Place as land suitable for low-density residential; however, a key concern is preserving the integrity of the single family neighborhood to the west.”

Civita already includes a park with trails so there will already be another point for ingress and egress and it will already be safe, balanced and efficient. Please remove that the road connection will do this when it is already happening without the need of the road connection and it will not happen with the road connection. 35,000 cars a day will not be safe, balanced or efficient as it will cause delays of 31-43 minutes. Please explain how the connection is safer, balanced or efficient compared to the No Project Alternative?

A 43 minute delays is not efficient, heavy traffic on a road is not safe and one main road that is not metered or calmed is not balanced for Serra Mesa or Civita residence in Mission Valley. Most of the traffic would not be from or going to Serra Mesa, the traffic would not be balanced if most of the traffic would be from Mission Valley. Please explain conclusion why a major artery road fits into a residential neighborhood.

Why was it not mentioned that the current plan already meets the goals of the General Plan without vehicular traffic which would be even safer than the proposed project? The No Project Alternative meets the General Plan goals with far less environmental impact than the proposed CPA. The two communities have multiple linkages already existing for example Mission Center Road and Mission Village Drive both connecting Mission Valley to Serra Mesa the distance separating the two roads is approximately 2.2 miles taking approximately 6 minutes. In conclusion it is no more than 1.1 miles or 3 minutes to get to either road in Mission Valley as the plan is now and adding another road that is 0.7 miles from Mission Center Road will not increase the compliance with the City’s General Plan because it is already complaint. Contrary to the DEIR, not making the connection proposed would integrate better in the General Plan; allowing traffic calming measures by increasing mass transportation as the best option for traveling in and out of Mission Valley. Use of transit would decrease the traffic congestion and increasing safety for all pedestrians and cyclists by taking more vehicles off the road. Please discuss if these statements are correct or incorrect and why? Please include in final DEIR if correct to be in compliance with CEQA.

“Overall, as shown in the consistency tables provided, the proposed CPA would implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan, the Serra Mesa Community Plan, and the Mission Valley Community Plan.”

The proposed CPA would not uphold goals policies and guidelines of Serra Mesa plan as the CPA is not in the Serra Mesa Plan and it would not improve Serra Mesa transportation or uphold safety of roads suitable for low-density housing to the west, Will this be added? The quotes from the General Plan, Serra Mesa Community Plan and the Mission Valley Community Plan all support the No Project Alternative, will this be mentioned in the DEIR. Please include the evidence that does not support the proposed CPA as it is required to be in compliance with CEQA.

4. Physically divide an established community”

Community on west side of proposed CPA would have 43 min delays to get into east side of Serra Mesa which would divide the existing community. CIVITA has many walking trails and activities throughout the neighborhood and this connection would make the 2 lane roads in CIVITA that do not have crosswalks up and down them, unpassable for the community to safely travel across on foot or bicycle. Will this be included in #4 as proof that the road connection will divide an established community? If not, why not?

The following pages are comparisons of the Serra Mesa Community Plan, the Mission Valley Community Plan and the San Diego General Plan. The detailed analysis of each plan shows significant contradictions of the proposed road connection in all Plans including the General and how the No Project Alternatives superior. This include this information in the final DEIR showing the Superiority of the current plan (No Project Alternative) over the proposed plan:

Serra Mesa Plan: the following are quotes from the Serra Mesa Plan found at <https://www.sandiego.gov/sites/default/files/legacy//planning/community/profiles/serramesa/pdf/serramesa042611c.pdf>

page 18 “RETAIN THE RESIDENTIAL CHARACTER OF SERRA MESA.

Goals Serra Mesa Plan

TO DEVELOP PEDESTRIAN AND BICYCLE LINKAGES CONNECTING OPEN SPACE, NEIGHBORHOOD AND COMMUNITY PARKS, SCHOOLS AND SHOPPING FACILITIES.”

The Serra Mesa Plan does not say a road connection must be made only that there should be pedestrian and bicycle access which is either already currently existing on Kaplan Drive or will exist through the park on the South side of Phyllis Place. Explain how the proposed CPA is an improvement to the current plan?

page 31 “EXISTING CONDITIONS Street System

Collector Streets are typically two to four lanes wide. They function as feeders of traffic to the major street system and provide continuity with local streets.”

Collector Streets are not just a way to get out in or out of the community by getting to a freeway faster. Why is it not mentioned that the propose CPA contradicts the Serra Mesa Community Plan in more than one way?

“An equally important function is that of providing access to abutting property. Local Streets serve adjacent land uses. They may be two-lane minor streets or one-lane alleys.”

Phyllis Place is a collector street and is not classified as a major street, why was it classified as such in the DEIR. The capacity of a collector street is 8,000 cars per day and the proposed connection will increase traffic to nearly 35,000 cars per day, which would not be supported by a collector street that serves a residential neighborhood. Phyllis Place is not meant as a major road to access the freeways but to provide access to a community. Will the inconsistence of the road classification be revised in the DEIR to represent accurate roadways and capacities? If not, why not?

“Efficiency of the primary arterial-major street network in the community varies considerably. Friars Road and Aero Drive function smoothly most of the time because there are few intersecting streets and virtually no driveways.”

This would not be the case of Franklin ridge road as it is in a densely packed residential area and would have many intersecting streets and driveways. Slowing the traffic considerably and negatively impacting the residents that live there. Will this be considered in making a determination about traffic congestion? If not, why not?

“Transit

An element of the transportation network destined to become more important as pressure mounts to relieve traffic congestion conserve energy and to improve air quality, is the public transit system.”

Transit systems should be used instead of impacting the road system further as stated in multiple Plans. Increasing Transit options should be considered an acceptable alternative as that is the basis that the CIVITA community was approved on. Why was increasing mass transit not considered an alternative? Can it be considered? What are the impacts of increasing mass transportation/transit? Would mass transportation/transit meet and be congruent with all the Plans? Please discuss.

“Bicycle, Pedestrian and Equestrian Trails

Non-motorized forms of transportation have achieved great popularity in recent years in response to increased concerns over personal and environmental health. The result has been a boom in bicycling, walking, jogging and horseback riding. Although these activities are oriented to both transportation and recreation, trails are a part of the circulation system. An important issue in the community is the establishment of an adequate bicycle route plan. Major bicycle generators include the six public elementary schools, St. Columbia Parochial School, Taft and Montgomery Junior Highs, Kearny Senior High, the library and the community park and recreation center. Problems confronting bicyclists are: (1) steep roads leading out of the community, (2) on-street parking along designated route lines and (3) general traffic.” 43/77 (page 35).

Trails are part of circulation and would meet the goals of the community and the city and the project objectives without the problems of traffic. Why was this not considered in coming to a conclusion on the superior option? Would a trail rather than a vehicular traffic road be a safer route for school children to get to travel within the community?

“However, few walkways intended solely for pedestrians exist in the study area. There is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers. Hiking trails have not been designated in the community but the regional bikeways could serve as major hiking routes. These could be linked to urbanized areas by trails through the attractive natural canyons.” 45/77 (page 37).

The community plan states the need for separate pedestrian access to activity centers; the proposed CPA would not allow safe and separate access. Explain why this was not mentioned in the DEIR under the section reviewing all elements of each plan and the contradictions between them? Will it be included? If not, give reasons for the exclusion.

“GOAL

TO PROVIDE A SAFE, BALANCED, EFFICIENT TRANSPORTATION SYSTEM WITH MINIMAL ADVERSE ENVIRONMENTAL EFFECTS.”

The most minimal effects would be the No Project Alternative. Allow the currently paths to function as an efficient transportation system and encourage use of mass transit, walking and biking. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

“Bicycle Routes

Three access routes should be established linking the mesa to regional bikeways serving Mission Valley and Murphy Canyon. One route should follow Mission Center Road from Murray Ridge Road to the Mission Valley bikeway. Should this route prove unfeasible, studies for an alternative route should be carried out. A second route should connect Aero Drive with the Murphy Canyon Bikeway. A third route should serve the Mission Village area. On a near term basis, a route connecting Mission Village Drive to the Mission Valley Bikeway should be investigated, possibly involving the City-owned slope easement on the west side of Mission Village Drive. . . Means of improving transportation linkages and lessening the impact of motorized vehicular traffic on the environment should be considered. Two possibilities are the “bicycle park-bus ride” and “piggy back” bicycle-bus transportation concepts.”

These options already in the community plan should be implemented to lessen the impact of motorized vehicular traffic on the environment. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

“Open Space

It is possible that most valuable purpose open space serves is its affording visual and psychological relief from the dreadful tedium and tension of interminable urban development. The human spirit must surely languish when confronted daily with a continuous and confused panorama of buildings, pavements and automobiles. In that it provides a physical patterning for the metropolitan fabric, open space helps give the urbanized area and its constituent communities a desirable definition, coherence, and character, which would otherwise be lacking. In turn, individual residents are better able to identify, and be identified with, their communities. The importance of these factors, while intangible, is not to be underestimated.”

The proposed road would not allow the open space vision as stated in the community plan. The road would break up the Parks view of the Mission Valley Canyon with pavement and automobiles. Why was this not included in the DEIR? Will it be included? If not, give reasons for the exclusion.

Mission Valley Transportation Plan: the following are quotes from the Mission Valley Transportation Plan found at:

https://www.sandiego.gov/sites/default/files/4_transportation.pdf

The five freeways that serve Mission Valley are I-5, I-8, I-15, I-805, and SR 163.”

Therefore further access to the 805 that is already accessible would be redundant. More access would only increase traffic on one of the busiest freeways in the city. Allowing access would not help the traffic congestion already facing the 805, it would only add to it. Explain why more connection is needed when five freeways are serving Mission Valley? Explain why improving infrastructure to onramps that already exists for these freeways is not a superior option?

“4.2 TRANSIT NEEDS The City of Villages strategy supports expansion of the transit system by calling for villages, employment centers, and other higher-intensity uses to be located in areas that can be served by high quality transit services. This will allow more people to live and work within walking distance of transit. Mission Valley is relatively well-served by transit, with most of the community within a quarter mile of a transit stop. The highest public transit ridership levels in the Mission Valley community are along the San Diego Trolley Green Line, as well as to and from the Fashion Valley Transit Center. Future transit needs in Mission Valley primarily stem from access limitations due to transit network gaps or poor services in terms of on-time performance, safety issues near transit stations, and connectivity issues.”

This is a direct quote from the Mission Valley Plan and is directly indicating that transit can be used within a quarter mile from most of the community. Why wasn't increasing transit or improving transit considered an alternative in compliance with CEQA and as it is a cornerstone in both Serra Mesa and Mission Valleys Community Plans? Please address this inconsistency with the conclusions of this DEIR and the written text of the two community Plans that are also in agreement with the City of San Diego's General Plan and the Bike Master Plan? Transit is the system designed to take cars off the road. Fixing the issues with transit gaps would improve traffic circulation and congestion and would meet objectives more efficiently than building more road connections that would further encourage vehicular traffic. Please address why this was not considered in the DEIR?

“In addition, a network gap exists near the Interstate 805 corridor, which links Mission Valley to communities to the north, such as Serra Mesa and Kearny Mesa.”

Fix the transit network gap, don't build a road. Why is our transit not being considered an alternative to a road connection? If people could use Mass Transportation to travel then all the Plans would be met and there would be no need for the proposed CPA.

“Safety Pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles.”

Page 38, directly from the Mission Valley Plan states 'it is safer if pedestrians are not with vehicles'; further supporting the No Project Alternative being consistent with Mission Valley's Community Plan. Why was the road width of proposed CPA not considered when factoring impacts on pedestrians and cyclists as it is stated directly in the Mission Valley Plan? Can it be considered? If it were to be considered, would the impacts be significant? Would the No Project Alternative be superior?

“The central portion of Mission Valley, between State Route 163 and Interstate 805, exhibits the highest number of pedestrian collisions in the community.”

From the Mission Valley Plan adding only pedestrian and cycling paths will ensure safety for pedestrians and cyclist by separating vehicles streets, why was this not considered? Will the trail through the Park south of Phyllis place be safer for pedestrians and cyclists than the proposed CPA with a street connection? Will this be considered in deciding which plan is superior? It is proven that no vehicles are preferred for safety in all Plans.

page 40 “4.4 BICYCLE NEEDS

Safety and comfort are paramount considerations, since by nature, active travelers are more exposed than those inside a vehicle. Unsafe or uncomfortable conditions discourage the decision to make a trip by bike.”

Again supporting the No Project Alternative and allowing the already planned pedestrian and bicycle path to make a safer and more comfortable condition encouraging walking and biking. Why was this not considered when analyzing the Mission Valley Plan? Was it not considered because it contradicts the proposed CPA? Please analyze impacts of proposed CPA verse pedestrians and bicyclists as it appears the existing plan/No Project Alternative including Kaplan Drive and the trail at Phyllis Place?

“Bicycle Level of Stress Bicycle Level of Traffic Stress (LTS) measures the level of comfort a cyclist would experience on a roadway, taking into account speed of traffic, presence of a physical barrier from traffic, width of bike facility, number of auto travel lanes, and intersection control. This measurement classifies streets and intersections from LTS 1 (suitable for children) through LTS 4 (suitable for riders who are comfortable sharing the road with autos traveling at 35 mph or more). In general, stress levels are high along most roadways in Mission Valley, regardless of the presence of bicycle facilities due to high traffic speeds, the high number of auto travel lanes, as well as the limited space given to the cyclists.”

Again, solved with No Project Alternative, where all paths are without vehicles which would lower stress to pedestrians and cyclists and encourage less travel by car. Does this prove the proposed project is contrary in multiple locations of both community plans? Why were these contradictions not mentioned when the first objective is to “Resolve the inconsistency between the Serra Mesa Community Plan and Mission Valley Community Plan as it pertains to a connection from Mission Valley to Phyllis Place in Serra Mesa”?
The proposed project would make both plans more inconsistent with each other and themselves. Please explain the contradiction. Changing the Mission Valley Plan to not include the connection would eliminate all the contradictions and is superior in creating plan consistency and overall better for the environment in every way. Please include in DEIR. If not, why not?

San Diego General Plan: the following are quotes from the San Diego General Plan <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf>

“Mobility Element of San Diego General Plan:

C. Street and Freeway System Goals

- ◆ A street and freeway system that balances the needs of multiple users of the public right-of-way.
- ◆ An interconnected street system that provides multiple linkages within and between communities.
- ◆ Vehicle congestion relief.”

The proposed connection does not relieve the vehicle congestion as stated as a Goal in the General Plan. Encouraging mass transportation would in fact relieve congestion without the proposed road connection.

“◆ Safe and efficient street design that minimizes environmental and neighborhood impacts.”

The proposed connection does not allow safe and efficient street design as it will negatively impact traffic and other environmental concerns. The road connection does

not minimize environmental impacts on the neighborhood of Serra Mesa. This is not a comment but a fact based on numbers in the data, please include.

“♦ Well maintained streets.

Discussion

Streets and freeways comprise the framework of our transportation system and play a major role in shaping the form of the City. The quality of the roadway system affects us whether we travel by automobile, transit, bicycle, or foot, and influences which mode of travel we choose.”

By choosing to only support transit, bicycle or foot alternatives the city is encouraging these modes of travel. If the road connection were to be approved it would in effect be encouraging automobile traffic instead, which is not consistent with the General Plan. Please correct false statements and include counter arguments based on evidence in the data.

Quoted from the San Diego General Plan

“The RTP calls for efficiency improvements using system and transportation demand management strategies, transit service improvements, bicycling and walking infrastructure improvements, and support for transit-oriented design and development.

A finer level of street system details may be provided at the community plan level.

Adopted community plans specify the planned system of classified streets within the local community.

Travelers benefit from shorter trips and multiple route options, and are more likely to walk or bicycle if distances are short. While vehicle congestion relief is an overall goal of the Mobility Element, the degree of acceptable vehicle congestion will vary in different locations based on the function of the roadway and the desired community character. Decisions that must balance the benefits and impacts of designing our transportation system for multiple modes of transportation will need to be made at the community plan or project level.”

As stated in the General Plan, vehicle congestions relief is the overall Goal, travelers are more likely to walk or bicycle if distances are short such as to an adjacent community and this is to be done at the community plan project level not dictated by larger government. The desired community character is not achieved by this proposed connection as shown by the Serra Mesa Planning Group’s 10-0 vote against the connection in 2016 and another unanimous vote in May 2017 for this DEIR.

“ME-C.1 b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time.

e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.” The General Plan states that public input should be increased in decision-making and public input is to reject the connection and please do not waste any more tax dollars on this issue ever again. Mission Valley Planning Group did not support the connection and Serra Mesa Planning Group strongly opposed the connection. Will public input and community group’s recommendations be considered in the approval of this DEIR? Will this issue continue to be brought up? When will the wasted tax dollars stop? Why are the community’s wishes not being heard? Will the Mission Valley Community Plan be updated to reflect no road connection to stop this government waste for an unwanted, unneeded, detrimental connection?

“ME-C.3 b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be designed to control traffic volumes and speeds through residential neighborhoods.”

These collector roads are specifically for routes to schools, parks, and village centers not to gain access to a major freeway that would not control traffic volumes nor speed through Serra Mesa’s or Mission Valley’s residential neighborhoods. Will the DEIR include this contradiction in the San Diego General Plan?

“d. Where possible, design or redesign the street network, so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.”

Allowing vehicular traffic at this propose connection site would form barriers to pedestrian traffic and community cohesiveness with increasing traffic congestion, noise and air pollution discouraging pedestrian traffic. Information in the general plan supports this as shown.

“5.2 Transportation/Circulation and Parking
Intersection LOS and Delay Ranges

F: Operations are at excessively high delay, considered unacceptable to most drivers. This condition often occurs when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay.”

If Phyllis Place, Via Alta and Franklin Ridge Road will become an LOS: F with the connection; how is that not considered a significant impact to the neighborhood character, safety and traffic and in conflict with all the Plans? Please justify all answers to the conclusions drawn throughout the entire DEIR, an LOS: F represents excessively high delays and it is considered unacceptable to most drivers. Therefore the proposed CPA would also be unacceptable and be in significant conflict with all Plans, General, Bike, Serra Mesa and Mission Valley.

“LOS Thresholds for Roadway Segments ABCDE

Collector (4 lanes) 10,000 14,000 20,000 25,000 30,000

Collector (4 lanes) (no center lane)

Collector (2 lanes) (continuous left-turn lane) 5,000 7,000 10,000 13,000 15,000

Collector (2 lanes) (multifamily) 2,500 3,500 5,000 6,500 8,000

Table 5.2-3 Freeway Segment LOS Definitions

F >1.00 Considerable

Forced or breakdown. Delay measured in average flow, travel speed (miles per hour). Signalized segments experience delays >60.0 seconds/vehicle”

Based on evidence in Tables in Appendix C Phyllis Place, Via Alta and Franklin Ridge Road, which are currently only 2 lane collectors, would be severely overloaded with close to 35,000 cars traveling on them every day. How is it acceptable to change the classification of a 2 lane collector to a “major roadway” when Via Alta and Franklin Ridge Road will not be widened to meet the classification of a major road way? How is it acceptable to connect such major streets in residential neighborhoods when bedroom windows are within 10 feet from the road that the DEIR is classifying as a major road? Please explain justification in

changing road classification without changing road widths or neighborhoods surrounding such roads?

“Existing Peak-Hour Intersection LOS

Currently A and B rating on most roads, the proposed road would decrease most roads to D, E, and F. Explain how this improves traffic circulation and congestion? It appears it does the opposite; will the conclusions be changed to reflect the data? If not, why not?

- I-805 North from Mesa College Drive On-Ramp to Murray Ridge Rd. LOS F (AM)
- I-805 North from Murray Ridge Rd. to I-8 LOS F (AM)
- I-805 South from Mesa College Drive On-Ramp to Murray Ridge Road LOS F (PM)”

As shown in current DEIR, the following freeway segments do not operate at an acceptable LOS D or better. Why is it thought that introducing 25,000 cars to 805 will help traffic circulation and congestion? If a freeway segment is already an F will traffic not just back up into neighborhoods the more traffic that tries to use the 805? Please explain reasoning on how the proposed CPA will meet the proposed goal of decreased traffic congestion and improve circulation?

Page 177/432 5.2.3.1

“Impacts are considered significant if the project would result in any of the following.

1. An increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system.
2. The addition of a substantial amount of traffic to a congested freeway interchange or ramp, or in a substantial increase in VMT for freeway mainline segments.
3. A substantial impact upon existing or planned transportation systems.
4. An increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway).”

Yes to all of these questions. These impacts are not mitigable and are significant; LOS F is a significant impact per the City of San Diego:

“City of San Diego Traffic Impact Significance Thresholds

F (or ramp meter delays above 15 minutes) 0.005 0.5 0.01 0.5 1.0 1.0”

What is Franklin Ridge Road classified as now? What will it be classified, if the connection is made? Is Franklin Ridge Road planned to be expanded? Will there be any crosswalks added to cross the street as there is only 1 top and bottom with many houses in between. Streets carrying as much traffic as estimated should not be 10 feet from residential windows so how is this figured to be safe for the residents of CIVIA? Was proximity to houses considered in this DEIR? Will it be, explain why or why not.

Significance of Impact

Long-Term Intersection Level of Service Analysis

- Franklin Ridge Road / Phyllis Place – LOS F (PM)
- Franklin Ridge Road from Via Alta to Civita Boulevard – LOS F
- Mission Center Road from Aquatera Drive to Murray Ridge Road – LOS F
- Phyllis Place from Franklin Ridge Road to I-805 SB ramp – LOS F

- Phyllis Place from I-805 SB Ramp to I-805 NB ramp – LOS F
- Murray Ridge Road from I-805 NB Ramp to Mission Center Road – LOS F
- Murray Ridge Road from Mission Center Road to Pinecrest Avenue – LOS F
- Murray Ridge Road from Pinecrest Avenue to Sandrock Road – LOS F
- Rio San Diego Drive from Qualcomm Way to Rio Bonito Way – LOS F

The above is proof of many more impacted roadways with the connection than without. Explain how the DEIR is justifying using VMT to determine significance and not accounting for the speed and grade these miles are being traveled, lowering gas mileage and increasing impact to very significant. Please provide data to support VMT as being a superior method of determining significance when actual emissions are account for.

MITIGATION

“Phyllis Place from Franklin Ridge Road to I-805 SB Ramp: a. MM TRA-1: Phyllis Place from Franklin Ridge Road to I-805 SB Ramp shall be reconfigured to accommodate 5 total lanes, 3 EB and 2 WB, including a median, satisfactory to the City Engineer.”

How does widening Phyllis Place to 5 lanes preserve the neighborhood to the west? Is there room to widen the road? Will the park be smaller? Will the Church parking lot be impacted? Will the Senior residents at City View Retirement Apartments on Phyllis Place be impacted? Currently there is no crosswalk on Phyllis Place at all; will a crosswalk be added to cross Phyllis Place if it is a 5 lane road? If not, why not?

4. Murray Ridge Road from Mission Center Road to Pinecrest Avenue: a. Murray Ridge Road from Mission Center Road Pinecrest Avenue shall be restriped consistent with a 4-lane Collector. i. Currently, Murray Ridge Road provides Class II bike facilities and on street parking. The proposed mitigation would either repurpose the existing right of way to provide four travel lanes by eliminating the bike lanes and on-street parking, or widen the roadway to accommodate four travel lanes and maintain Class II bike facilities and on-street parking. Widening the roadway would require removal of residences on both the east and west sides of Murray Ridge Road along the entire stretch of roadway segment. Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), it is not recommended, and the impact would remain significant and unavoidable.”

This is proof that the proposed road connection will have a significant impact on neighborhoods and traffic. No plan wants this to happen because it would eliminate bike lanes, parking and homes, same effect with multiple other mitigations. Please explain, do the mitigation have to be done? Will they be done? How soon after the connection is made do they need to be done? Will the bike lanes and parking be removed or the houses on Murry Ridge Road? What will happen to traffic and the neighborhood if the mitigations are not done as conditions of the project? Who will pay for the mitigations? If the developer pays for the connection as quoted verbally on numerous occasions will the developer also pay for the mitigations? Which mitigations will the developer pay for? If there is no money in the city budget for mitigations and the connection is put in by the developer when and how will the mitigations be completed? What will the impacts be to Serra Mesa? No mitigations are required in the Quarry Falls CPA. Do the tax payers pay for the mitigations?

“IMPACTS Would the proposed project result in a substantial impact upon existing or planned transportation systems?

The following should be added in support of the No Project Alternative. The connection will not be more efficient. The study concluded the proposed CPA would not reduce traffic congestion especially at the community level and the area would not have improved access based on the overwhelming negatives to existing street connections and predicted traffic flows. The Phyllis Place neighborhood is the only area that would have another road access not the entire Serra Mesa area as Mission Center road is an easy right turn, which the majority of Serra Mesa would have to pass by in order to go all the way down to Franklin Ridge Road. Most residents would take the shortest route from their house which would still be Mission Center Road, therefore the majority of the community would not benefit. Traffic from Mission Valley would have another access point to the 805 that would make more congestion and increase traffic to Serra Mesa by over 25,000 cars per the traffic study. Therefore on the community level this would not improve access in the area and would do the opposite of adding a 43 minute delays to a freeway that currently serves the community with less than 15 minutes of delay and is projected to do so through the year 2035.

Phyllis place does not have any problems currently and functions well to serve the low-density housing it supplies. Phyllis Place already has access to necessary emergency access points and has no need for the connection making the impact more than significant, not less. Phyllis Place is the only entrance and exit for the entire community west of Phyllis place, unable to support the proposed connection due to the density of traffic that will block residence west of Phyllis Place. The connection may be used to access 805 by immediate residents of the area but it will also serve as a major artery for the entire Mission Valley East, Mission City, North Park and University Heights between Mission Center Road and Mission Village drive to have direct access to 805 creating a bottle neck on Phyllis Place, a solitary exit road for residential houses. Texas is a major artery turning into Qualcomm Way into Franklin Ridge Road allowing direct access to 805N and 805S which will significantly impact the traffic and circulation in the Low-Density Residential area with only one road. As it is now traffic can go on the 8, 15, 163 and get to the 5, along with many other large surface streets such as Friars Road. All these road connections meter traffic and allows for multiple options for travel. If the connection is approved the road will be a direct road to access the 805, eliminating traffic calming and metering prior to the bottle neck of the 805 during rush hours. There are currently not problems in the proposed amendment area and the traffic runs very efficiently. Explain and give proof with data how the proposed project will provide a more efficient, integrated circulation network? How will it reduces traffic congestion at the community level and improve access in the area? Explain how traffic calming works with VMT. Does VMT matter if the shortest distance is through a residential area? Does VMT take into consideration the size and location of the shortest distance and the traffic implications of the shortest way?

The majority of Serra Mesa lives closer to Mission Center Road, driving further to get to Phyllis place would be less convenient than it is currently. The transit system will not be any closer to Serra Mesa with this connection and the planned trail linking the two communities would provide better access to transit than vehicular traffic. Study the

benefits of not approving the proposed CPA as required by CEQA. Was the proposed trail and the pedestrian and bicycle access taken into account in coming to this conclusion? Would the current access provide safer access to transit? Would the current access encourage more users of transit as stated in the Mission Valley Plan and the General Plan?

The connection would not be efficient. Based on the LOS being an F and the delays at the onramps going from acceptable to 43 minute delays, will this statement be added? If not why not?

The proposed connection would increase community congestion; there is already emergency access points and linkage for handicap, pedestrians and bicyclists. Would the proposed CPA add a bike lane or replace the planned safe path with one heavily impacted with 35,000 cars? Explain how this information is incorporated in the conclusion stating ‘relieved congestion’? Impacts are found to be significant and the text of this document should correlate with the data.

Where are the facts to justify the road connection would be more efficient and reduce traffic congestion, at the community level? There is supporting evidence that traffic congestion would be increased and less efficient. The connection would not reduce traffic congestion at a community level when there is not traffic congestion on Phyllis Place and widening it to 5 lanes would not preserve the neighborhood to the west. Stating that the proposed connection would provide benefits, when benefits already currently exist is inappropriate and incorrect.

Page 177/432

“Would the proposed project result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway)?”

A road would increase traffic and decrease walkability creating potentially hazardous conditions to the public. Documented in the Mission Valley Plan and the General Plan, proximity to vehicles decrease safety and more accident have occurred on roadways with traffic than without; 35,000 cars would undeniably increase hazards significantly. Will this statement be added? If not, why not, please provide facts and data to support conclusions.

Page 209/432

“Issue: Would the project substantially alter present circulation movements including effects on existing public access to beaches, parks, or other open space areas?”

Community Access The traffic study evaluated effects that the potential road connection would have on emergency access, evacuation access to social, educational resources, and commercial shopping as well as the service needs of the affected communities on either side of the potential connection. To understand community access, the traffic study measured two reference points to and from which the relative access times could be measured for both the with road connection and without road connection scenarios. The analysis looked at access to hospitals, fire and emergency medical services, educational facilities, parks, libraries, community centers, and other recreational facilities. Refer to Chapter 8 of the traffic study (Appendix C to the DEIR) for a full discussion of how this analysis was conducted. The times to each facility was averaged for the two reference points and are presented in Table 5.2-23, Community Access Travel Times.

Table 5.2-23 Community Access Travel Times

Facility Type Representative Accessibility Time Traveled (min.) Without Connection With Connection

Hospitals 39 31

Fire departments 42 32

Schools 153 135

Libraries 40 32

Shopping centers 69 57

Parks 58 50

As the table demonstrates, accessibility to a variety of public amenities increases with the road connection.”

Where are these numbers from? They do not make since, how would it be any faster to get to services when the services are contained within the community and the proposed road is not near any services? What services take that long to get to? Why was this studied the way it was? How were the two points chosen? Why are the times averaged? People go to the hospital or school closest to them, so why is it important to average the time it would take to get to 4 different schools or four different hospitals. This analysis is not rational and needs to be completed in a more concrete way. Will statements based on faulty data be removed? A person could crawl to a hospital or school in the time this table estimates it would take to drive with or without the road, please explain. Response times for emergency vehicles are stated to be between 5-7 minutes for all location in Mission Valley and Serra Mesa which is within normal limits, the connection is not needed in order to be compliant. How does this chart prove anything? Will it be removed, if not why not?

Page 210/432

“Emergency evacuation and routing were also considered in the traffic study. The analysis found that currently there is only one route of access to the more than 200 homes in Serra Mesa at the western end of Phyllis Place on the north rim of Mission Valley. This public access route is via Phyllis Place leading to I-805 or further to the east and continuing on surface streets like Murray Ridge Road. Also, Phyllis Place is constructed as a two-lane collector street having a nominal (i.e., policy based rather than actual) capacity of 8,000 vehicles per day.”

*****Therefore, the traffic study concluded there was limited additional benefit to these more than 200 homes for evacuation by having a road connection.**”

***** This statement from the DEIR proves that emergency evacuation had limited benefit to the over 200 homes near the connection. Please include this as the conclusion supporting that the proposed CPA is not superior to the No Project Alternative. Will conclusions drawn be adapted to include this information based on the facts? If not, why not?**

148/432

“Policy UD-C.7 Enhance the public streetscape for greater walkability and neighborhood aesthetics. The proposed project would include a street connection to encourage greater walkability. Additionally, the implementation of the proposed project would provide additional ingress and egress to the adjacent Quarry Falls site, which would improve circulation in the immediate area and provide greater access throughout.”

False, where is the proof of this statement? How would more traffic encourage walkability when it would be replacing a trail without traffic? How would more traffic that is not local improve circulation in the immediate area and provide greater access throughout? Please

remove in all places or justify with facts (which do not exist, remove ‘greater walkability’, that road connection would ‘encourage walking’).

Page 210/432

“Construction of the roadway would provide additional ingress and egress off Phyllis Place and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley that would improve access in the area. Furthermore, the project would provide an additional link for pedestrians and cyclists. It would also link those using vehicles within Serra Mesa to the Quarry Falls site and the greater Mission Valley community, providing access to community parks and making transit services more readily available”

Prove this statement or take it out. There will be no parking on the road for the community park if the proposed road is created, decreasing the access to the Park. How does a road for vehicles make transit more easily available? People who use transit are pedestrians and cyclists and the current plan of a safe trail without cars is being replaced with cars. Wouldn't this decrease patronage of transit and the park? There is already 2 vehicular links between the two communities and adding another would not increase access to community parks nor make transit services more available. The transit services are off Mission Center Road not off proposed road connection, so transit would not be more readily available. Also the transit stops do not allow parking so having vehicular access is not helpful if there is nowhere to park. Adding more avenues for vehicles without providing parking for those vehicles at community parks and transit will not provide access. The increase in vehicles will however negatively affect the pedestrians and cyclists that could use the community parks and transit by splitting a park in half with 4 lanes of traffic in the middle of the park, by increasing traffic by 25,000 cars where there is a safe walking and cycling only path as it currently is. Please explain reasoning and remove false statements.

“5.2.13 Significance of Impact

The project would not substantially alter present circulation movements, including effects on existing public access to beaches, parks, or other open space areas.”

How would significant delays of 43 min not alter present circulation movement to beaches parks or other open spaces? Please correct false statement.

Page 211/432

“5.2.8 Impact Analysis Issue

6: Alternative Transportation Would the proposal result in a conflict with adopted policies, plans, or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?”

Yes, it would encourage use of vehicles, conflicting with adopted policies. It is safer to walk and bicycle without vehicular traffic as stated in the Mission Valley Plan and the General Plan. Will this be added? If not, why not? All the statements made that the proposed road connection will be less than significant in terms of alternative transportation is incorrect and must be removed. All of the rational is based on false data as the connection at Kaplan Drive and Aperture Circle and the trail that is already in the plan going through the Phyllis Place Park has not been considered. Once considered all conclusions that the road connection would help pedestrians or cyclist or that it fits into the General Plan or Master Bike Plan is false and must be removed. As the access is better as it is currently existing then with proposed connection.

Page 211/432

“BIKE LANES

The proposed project would therefore increase bicycle network connectivity between the Serra Mesa and Mission Valley communities and thus would not conflict with overarching goals and policies of transit plans to provide balanced and safe bicycle networks within and between communities.”

False bicycle access is already in the plan so the connection will not provide additional access. A bike path without vehicular traffic is currently planned which is better for pedestrians and cyclist and would improve connectivity. Explain why the bike path going through the park on Phyllis Place, connecting the communities was not used in coming to conclusions this DEIR? Correct the inaccuracy that it would ‘improve’ connectivity for cyclists because vehicular traffic would do the opposite and there will already be a path so this connection would not ‘increase’ connectivity.

“Pedestrian Facilities

The proposed project would therefore increase pedestrian connectivity between communities.”

False, there is already a walking connection to Mission Valley and access on Mission Center Road and Mission Village Drive, the majority of Serra Mesa is closer to those roads than the proposed road. The over 200 houses close to the connection can easily walk or bike with existing connections on Kaplan Drive and Aperture Circle including handicap ramps or the trails that are at the proposed connection site without traffic and do not need an additional road for access. Please remove sentence as “increase” has not been proven and the traffic study proves otherwise. Will the statement be corrected or removed in all places? If not, why not?

Page 231/432

“Carbon Monoxide Hotspots

The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor.”

Phyllis Place will be an LOS F after the connection, why wasn’t it studied? Will it be? If not why not? The apartments at city view church are senior residence, which are sensitive receptors, why were these homes not considered? Will they be studied as is required by CEQA? If not why not? The proposed CPA should be denied because it does not show a significant reduction in traffic or congestion relief and does not study environmental impacts such as this because the objectives were not accurately describing the underlying goal as required by CEQA. Will the conclusions be rewritten to state the No Project Alternative is superior? If not why not based on the overwhelming evidence to support the No Project Alternative?

How are the conditions from LOS: ABC without connection to LOS: EF with connection found not to be significant?

Table Long-Term Without and With Connection Analysis (CO hotspots)

Key Intersection	Time Period	Existing Condition	Long Term	With Connection	Mitigation
Feasible?	Within 400 feet of Sensitive Receptor?	Requires CO Hotspot Analysis?			
Murray Ridge Road and Sandrock Road	PM	B E	No	Yes	Yes
Murray Ridge Road and I-805 NB ramp	PM	A F	Yes	Yes	Yes

Murray Ridge Road and I-805 SB ramp	AM	B	E	Yes	No	No
	PM	B	F	Yes	No	No
Qualcomm Way and Friars Road EB ramp	PM	B	E	Yes	Yes	Yes
Qualcomm Way and Friars Road WB ramp	AM	PM	C	E	Yes	NA
Qualcomm Way and Rio San Diego Drive	PM	C	F	No	Yes	Yes
Via Alta and Franklin Ridge Road	PM	NA	F	Yes	NA	No

*****Via Alta and Franklin Ridge Road at will be LOS F. The proposed road would result in an LOS F which means it is not deteriorating to an F but will start as an F. Proof to why it should not be superior. None of these key intersections would improve at all, only get worse from ABC to only Es and Fs.***** Explain how the worsening of the air quality would not prove the No Project Alternative to be superior? Is it not significant to have almost all intersection go from as LOS of ABC's to E's and F's with the connection? How can the proposed CPA be considered based on this overwhelming evidence to the contrary?

“Cumulative Impacts Found to be Significant Transportation/Circulation and Parking Long-Term Intersection Level of Service Analysis

The long-term intersection analysis shows existing conditions compared to the long-term conditions with the road connection. With the road connection, the following intersections do not operate at an acceptable LOS:

- Friars Road / Northside Drive – LOS E (PM)
- Qualcomm Way / Friars Road WB ramp – LOS E (PM)
- Qualcomm Way / Friars Road EB ramp – LOS E (PM)
- Murray Ridge Road / I-805 NB ramp – LOS F (PM)
- Murray Ridge Road / I-805 SB ramp – LOS E (AM)
- Murray Ridge Road / I-805 SB ramp – LOS F (PM)
- Murray Ridge Road / Sandrock Road – LOS E (PM)
- Franklin Ridge Road / Phyllis Place – LOS F (PM)
- Franklin Ridge Road / Via Alta – LOS F (AM/PM).

Long-Term Freeway Mainline Analysis

The long-term With Connection Freeway Mainline Analysis shows existing conditions compared to the long-term conditions with the road connection. With the road connection, the same freeway segments do not operate at an acceptable LOS D or better:

- I-805 NB from SR-163 to Mesa College Dr On-Ramp – LOS F (AM)
- I-805 NB from Mesa College Dr On-Ramp to Murray Ridge Rd – LOS F (AM)
- I-805 NB from Murray Ridge Rd to I-8 – LOS F (AM)
- I-805 SB from SR-163 to Mesa College Dr On-Ramp – LOS F (PM)
- I-805 SB from Mesa College Dr On-Ramp to Murray Ridge Rd – LOS F (PM)
- I-805 SB from Murray Ridge Rd to I-8 – LOS F (PM)

Long-Term With Connection Freeway Ramp Meter Analysis shows the existing conditions are compared to the long-term conditions with the road connection. Ramp meter analysis was conducted at I-805 SB and NB ramps at Murray Ridge Road. The most restrictive ramp meter rates were provided by Caltrans. With the road connection, all ramps also operate with less than 15 minutes of delay except:

- I-805 NB ramp at Murray Ridge Road – 43 minutes of delay (PM)
- I-805 SB ramp at Murray Ridge Road – 31 minutes of delay (PM).

Based on the City's significance thresholds outlined in Table 5.2-9, City of San Diego Traffic Impact Significance Thresholds, several intersections, roadway segments, freeway ramp meters, and freeway mainline segments have been determined to result in significant cumulative impacts.
Summary of impacts:

Long-term Impacts with Road Connection Number Impact Location Cumulative Segment Impacts

- 1 Phyllis Place from Franklin Ridge Road to I-805 SB ramp
- 2 Phyllis Place from I-805 SB ramp to I-805 NB ramp
- 3 Murray Ridge Road from I-805 NB ramp to Mission Center Road
- 4 Murray Ridge Road from Mission Center Road to Pinecrest Avenue
- 5 Murray Ridge Road from Pinecrest Avenue to Sandrock Road
- 6 Mission Center Road from Aquatera Drive to Murray Ridge Road
- 7 Rio San Diego Drive from Qualcomm Way to Rio Bonito Way
- 8 Friars Road / Northside Drive
- 9 Murray Ridge / Sandrock Road
- 10 Murray Ridge Road / I-805 NB ramp
- 11 Murray Ridge Road / I-805 SB ramp
- 12 Qualcomm Way / Friars Road WB ramp
- 13 Qualcomm Way / Friars Road EB ramp
- 14 Via Alta/Franklin Ridge Road Cumulative Freeway Ramp Meter Impacts
- 15 I-805 NB ramp at Murray Ridge Road
- 16 I-805 SB ramp at Murray Ridge Road Cumulative Freeway Mainline Segment Impacts
- 17 I-805 from SR-163 to Mesa College Dr
- 18 I-805 from Mesa College Dr to Murray Ridge Rd
- 19 I-805 Murray Ridge Rd to I-8"

How do all of these significant impacts make the proposed project feasible? Do these impacts mean anything? There will be extreme delays impacting the community that would not exist without the connection. This proves that the proposed CPA will not meet the objectives in relieving traffic congestion or improve circulation. Please revise all contradictory statements as the No Project Alternative is superior in every way not just slightly.

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain "Significant and Unavoidable." DEIR 38-42/432

In light of the mitigations not showing significant improvement to the impacts why is the proposed project still being considered to the No Project Alternative?

Page 393/432

"7.6 POPULATION AND HOUSING

Issue 1: Would the proposed project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?”

The proposed project may not induce population growth but is proposed due to Mission Valley’s population growth. The proposed connection would make future development easier to build and could lower impact fees for businesses in the area which in turn will induce substantial population growth in the area. Please correct statements in the DEIR. The connection would increase density/intensity beyond the community plan of Serra Mesa, why was this not covered in the analysis? Will it be included? If not, why not?

Page 394/432

“Issue 2: Would the proposed project displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?”

The proposed project would substantially alter the planned location, distribution and density of both areas. Without the connection the location, distribution and density would be approved in other areas instead, why was this not addressed? The question was not answered in the response given in the DEIR, please answer the question asked. The connection is not in the Serra Mesa plan therefore would alter the current plan. How would the connection alter the distribution and density of the Serra Mesa’s current Low-Density Residential streets such as Phyllis Place? Would residents of the Low-Density Residential area to the west be impacted with the increase in density and distribution of the increasing Mission Valley population? What about the people and homes on Murry Ridge Road that would be removed in the mitigation, why were these houses not considered, will they be? If not, why not?

“Issue 3: Would the proposed project include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvements Project list, when such infrastructure exceeds the needs of the project and could accommodate future developments?”

First off in the revised DEIR Issue 2 was repeated and Issue 3 from the PEIR is as quoted above, will this Issue be added back into the Final EIR? If not why not? Why was it removed? The propose project would require other infrastructure not assumed in the community plan of Serra Mesa and would add to the Capital Improvements Project lists as proved by the mitigation required to complete the project. All 3 of these issues were not addressed in the responses provided; please clarify the costs of infrastructure not assumed in the Community Plan and the adopted Capital Improvements. If the CPA is approved the road will be connected as a result and the cost and future developments will be affected and need to be considered. Will they be considered? If not, why not?

“The CPA area is currently designated residential in the Serra Mesa General Plan and zoned for Low-Density Residential use (City of San Diego 2011a)... Finally, no displacement of existing housing would result with future implementation of the CPA. Overall, population and housing impacts would be less than significant.”

This area is zoned for Low-Density Residential the new traffic restrictions would significantly impact the population and housing in the CIVITA area and the Abbotts Hill area, why was this not mentioned. Will this be included? If not why not?

Page 394/432

“7.7 Public Services and Facilities

“Overall, the proposed project would be adequately served by the existing area fire-rescue department facilities, would not generate the need for a new or expanded fire station in the project site, and would generally improve emergency access and thus response times. No impact would occur.”

How can a road with 25,000 more cars improve response times? Was the current emergency access at Kapan Drive and Aperture Circle considered in this determination? Would the current access be easier, faster, more efficient than a new road with increased traffic? Please explain reasoning and consider the actual facts as required by CEQA. How can police get through 25,000 cars to service Abbots Hill or CIVITA during traffic times versus currently with only 2,400 cars? How can children of Abbots Hill or CIVITA safely get to school with morning and afternoon traffic delays up to 43 minutes? Is it even safe for children to walk to school with that much traffic in a residential neighborhood? Wouldn't traffic block children from traveling between their home and school? Plus there is no cross walks to cross Phyllis Place at all, on the entire small 8,000 car capacity per day, low density residential road that would be made into a 5 lane major artery. Please remove that no impact would occur as it is not able to be proven, given the evidence.

Page 394/432

“Also, as discussed in Section 5.2, Transportation and Circulation, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.”

These statements are unfounded and must be removed. How would the road connection accommodate roadway network demands? It does not add any entrances to the 805; it will only over load the current entrances and exits to the 805? How would the connection improve emergency access between the areas? There is already a connection for emergency vehicles at Kaplan Drive. Even if the proposed connection does not increase the population, traffic delays would significantly slow down response times to area west of proposed connection as stated in the data of the traffic analysis. Please correct contradictions with data.

“No residential housing component is proposed under the CPA; therefore, local school districts would not be affected by implementation of the project. No significant impacts to schools would result.”

Schools would be affected as there is proposed to be a school on Via Alta, the increase in traffic would seriously diminish the safety for children to walk to school, considering there is only one cross walk on Via Alta. Please correct false statement. Mission Valley will build a school in CIVITA to support the population and therefore would not need access to schools in Serra Mesa. Therefore the connection would not be needed for this purpose. Please correct false statements.

“Parks and Recreational Facilities

Future implementation of the street connection would increase pedestrian and bicycle access from Phyllis Place to parks and recreational amenities within the Civita project.”

False, the implementation of the street connection would not increase pedestrian and bicycle access due to increased vehicular traffic. A connection for pedestrian and bicycle access already exists with current approved plan through the park and at Kaplan Drive and further vehicular traffic would only deter the use of the road for this purpose. Will this

inaccuracy be corrected? Will a study that proves these conclusions be included? If not, will increase of access for pedestrian and bicycle removed? If not, why not?

Page 395/432

“Police Services

As confirmed with SDPD, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Brown pers. comm.). The additional access route would improve emergency access in the area, potentially reducing emergency response times associated with police responders.”

What proves the increase in circulation efficiency, the traffic studies conducted in this DEIR prove this not to be true? How would this access improve emergency access in the area? As there is already emergency access connecting the two communities in this area that is not hindered by increased vehicular traffic, please explain use KAPLAN DRIVE? The increase in traffic to this area would result in slower response times for residents to the west of proposed connection; as Phyllis Place is the only access for emergency services to this area. ‘As confirmed by SDPD that additional access points generally improve emergency access’ this statement is ludacris, you cannot justify a road connection by a general statement when that general statement does not fit the project area. The access that is being considered increases the traffic in the area from 2400 cars to 35000 cars and traps an entire community with only one ingress and egress. This entire statement need removed as it is inappropriate to use a blanket statement without any facts to back it up and only information that proves it contrary. Will it be removed? If not why not? Justify false statement.

Page 394/432

“Fire–Rescue Services

As confirmed with the San Diego Fire-Rescue Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Trame pers. comm.).”

False, access already exists at Kaplan Drive; the proposed connection would decrease accessibility by increasing traffic and making the area less accessible. Will this be included? If not, why not? You cannot use general statements as justification when there is proof that this general statement does not apply. Remove it! Or PROVE it!

“As such, the CPA is anticipated to result in better response times for the nearby fire stations.”

False, prove how this would result in better response times when the response times are already at acceptable levels and the DEIR says it would not help the residents close to the connection?

“Moreover, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access.”

False, where is the proof that the connection would increase circulation efficiency? The studies prove otherwise. Prove how the increase in vehicular traffic would improve access that already exists without vehicular traffic? The immediate project vicinity will be the area most negatively affected and will not have improved circulation and emergency access as there will be 35,000 more cars in the area with the connection. Explain how the conclusion is drawn, will data be provided to back up conclusions facts? If not, why not?

Page 396/432

“7.8 Public Utilities Electricity and Natural Gas”

How will the large pipeline under proposed road connection be affected? If approved would the pipe line be moved or altered? How would pipeline be accessed in case of emergency if it is under a 4 lane paved road way?

Page 397/432

“7.9 Recreation”

The CPA area is currently vacant and designated Low-Density Residential (five to nine units per acre)”

How can this Low-Density Residential area support the large density traffic from Mission Valley? Where will cars park to go to the Park if the road must be widened to 5 lanes and there will be no parking on the side of the Phyllis Place as there is now?

“SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Permanent changes as a result of amendment implementation would include traffic, noise, and an increased human presence in the area.”

Please include the previous statement in the conclusions as the impact is significant and is required by CEQA to be included. Does increased human presence impact neighborhood character? Does traffic and noise impact neighborhood character? If so please also update the section regarding neighborhood character.

Page 399/432

“CHAPTER 8 MANDATORY DISCUSSION AREAS

(1) significant effects which cannot be avoided; (2) significant irreversible environmental changes which cannot be avoided if the project is implemented; and (3) growth-inducing impacts.

8.1 SIGNIFICANT EFFECTS WHICH CANNOT BE AVOIDED

What are the costs of the mitigations? Will all mitigations be done? What is the time frame in relation to the road connection being implemented?

Page 402/432

“8.3 Growth-Inducing Impacts

Significant growth impacts could also occur if the project provides infrastructure or service capacity to accommodate growth levels beyond those anticipated by local or regional plans and policies.

2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area”

The Low-Density Residential area in the propose CPA is not planned for a density or growth rate of the population from Mission Valley? Please explain why this was not considered in this analysis, will it be included? If not, why not?

“3. Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvement Project list, when such infrastructure exceeds the needs of the project and could accommodate future development.”

What are the costs of these Capital Improvements?

How can no significant new traffic be generated when all the roads in the area will be going from ratings of ABC to E and F with delays of 43 minutes at peak times? Please explain and give proof with data as required per CEQA.

The question asked if the project could accommodate future development and Serra Mesa cannot as it is already delayed to get on the 805 and the Low-Density Residential area west of the proposed connection will be separated from the rest of the Serra Mesa Community and not easily accessible. Please include in DEIR, if not explain why not.

Proposed connection will alter the community of Serra Mesa's Plan, distribution of traffic and the density in the area based on DEIR findings, will it be proven that the proposed CPA will not substantially effect the population of this area? If not, why not?

Page 280,281/317

"CHAPTER 9 ALTERNATIVES

The CEQA Guidelines also require a discussion of why other alternatives were rejected if they were considered in developing the project and still would meet the project objectives.

9.2 Project Objectives

Project Objectives, of the DEIR, and are included here as follows:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa."

Describe and evaluate why the Mission Valley Plan is not being resolved to be consistent with the Serra Mesa Plan? Resulting in less government money spent and better circulation for Serra Mesa as well as safer and pedestrian and bicycle connections between the two communities.

2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.

Traffic studies contained in this DEIR prove the connection will not improve circulation, please prove and remove false statement. Traffic circulation will fall from LOS ABCs to all Es and Fs on every road connection studied, how does that improve circulation?

3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.

Traffic studies contained in this DEIR prove the connection will not improve traffic congestion, please prove and remove false statement. Traffic circulation will fall from LOS ABCs to all Es and Fs on every road connection studied, how does that improve circulation?

4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

Kaplan needs to be considered in this analysis and it's lack of consideration based on proof that this DEIR has knowledge of its existence is gross negligence and all conclusions drawn about improving access of any kind is false because access already exists.

5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

How does allowing vehicular traffic on paths currently approved and planned for only cyclists and pedestrians allow for safer travel conditions than without vehicles?

- Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.

Why was this removed since the PEIR? Will it be included? Why or why not? The current approved plan already has interconnectivity between the communities and will have a pedestrian and cyclist path through the park where this connection is proposed. The Bicycle Master Plan is safer without traffic congestion on paths lowering vehicular accidents with cyclists and pedestrians and increasing walkability decreasing vehicles on the road. Why is the No Project Alternative not more superior in every way?

As stated in Appendix C “Another alternative for consideration involves a pedestrian and bicycle only path should there be no public road connection via Franklin Ridge Road to Phyllis Place. Were there not to be a roadway connection there would at least be some public pedestrian and bicycle path system for those users to get between the two communities even if vehicles could not make that connection, particularly since a park will be created at the upper end of the grade along Phyllis Place.” **More proof that the No Project Alternative will also include the connection for pedestrians and cyclists in compliance with the General Plan and Bicycle Master Plan.**

“9.3 Significant Impacts

Not all impacts have mitigations that would reduce potentially significant impacts to less-than-significant levels.

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.” DEIR 38-42/432

The road connection has been shown by studies in this DEIR to be more negatively impactful for the community of Serra Mesa than not having the connection at all. The summaries continue to state less than significant impacts when the facts in the tables support more detrimental effects with connection than without. Please review false statements contradictory to the evidence presented by the studies done on the supporting tables.

“The focus of this alternatives analysis is to identify feasible alternatives that would reduce or avoid the significant impacts of the proposed CPA.”

The feasible alternatives have been overlooked and not analyzed as required by CEQA. If accurately analyzed the alternatives would be shown to be superior to the proposed project in every way based on the traffic data in Appendix C.

“9.4 Alternatives Eliminated from Detailed Consideration

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.”

The proposed CPA fails to meet the most basic project objectives and does not help traffic or congestion at all, in fact makes it worse based on all the data in the traffic study in Appendix C. The alternatives were not accurately studied, as emergency access is existing at Kaplan Drive; Intercommunity connectivity exists with Mission Center Drive and Mission Village Drive; Trails connecting to the Master Bike Plan will exist between communities on Phyllis Place and already currently exist at Kaplan Drive and other areas throughout the community. Based on the insufficient study of evidence the No Project Alternative would prove superior as it meets all the environmental goals and it’s only exception is it does not resolve the inconsistencies between plans; which can more easily be done by amending the Mission Valley Plan, as changes to the Serra Mesa Plan would still create inconsistencies within the City’s General Plan, Master Bike Plan, Mission Valley Plan and Serra Mesa Plan. Changing the Mission Valley plan while currently undergoing a plan update would require much less changes and allow all the plans to be compliant with one another. See section analyzing Plans that was left out of the DEIR on previous pages.

“Alternatives Under Consideration

The key question and first step in analysis of the off-site location “is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location” (14 CCR 15126.6(f)(2)(A)).

The City of San Diego considered two alternative alignments. Both would be slightly to the east of the proposed alignment.”

Why were other sites not considered such as sites currently in the community plan for access to Mission Valley? Where exactly were these sites considered? Where is the information on why other sites were not acceptable? What about the Unnamed Road on the East side of the 805 and North side of Friars to access 805? The road already exists and there are no residential neighborhoods or homes that would be directly negatively affected by this connection to 805. Why was this option not considered? Why was an onramp from Mission Center Road not considered to bypass the traffic in the residential neighborhood on Murray Ridge Road? Why wasn’t access from Qualcomm and Texas near the 8 freeway considered? As Texas and Qualcomm cannot get to the 805 without going to Mission Center Road; access from the 8 to the 805 in this section could significantly decrease the traffic in Mission Valley and the backups that happen at Mission Center Road and the 8 Freeway.

“Amend the Mission Valley Community Plan To resolve the conflict between the Mission Valley and Serra Mesa Community Plan, an alternative could be to amend the Mission Valley Community Plan to remove any reference to a street connection with Serra Mesa on Phyllis Place. This alternative is rejected because it would not promote intercommunity connectivity as envisioned in the City’s General Plan.”

Why is this plan rejected? The City’s General Plan is to have intercommunity connectivity and there is already existing connectivity between the communities on Mission Center Road as well as multiple bicycle and pedestrian paths currently in the approved plan on Kaplan Drive and through the Park linking the two communities. Adding vehicular traffic

would actually be counterproductive to the City's General Plan in that it would not further encourage interconnectivity of pedestrian networks nor result in less congestion and improved circulation. Mission Valley has been approved to build very large, very dense housing due to access to mass transportation options. By building a second vehicular connection the housing developed on the approval of mass transportation would be flawed as mass transportation, biking and walking would not be encouraged to promote effective mobility networks to effectively move workers and residents. Encouraging bike and pedestrian traffic would decrease vehicular traffic and congestion and improve overall circulation. Therefore an amendment to the Mission Valley Plan would be the best alternative to promote intercommunity connectivity as envisioned in the City's General Plan. Prove why it would not promote better, safer, intercommunity connectivity without the road.

"No Project Alternative

Couldn't this be alleviated by amending Mission Valley's Plan instead? How was it concluded that the impacts on land use would be greater than the proposed project? No Project Alternative would have less impact on land use than proposed project by encouraging Mass Transportation/Transit in Mission Valley. The following is directly from the City's General Plan and why the proposed project is not in compliance with the General Plan:

General Plan: the following are quotes from the San Diego General Plan

<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf>

"Mobility Element of San Diego General Plan:

C. Street and Freeway System Goals

♦ A street and freeway system that balances the needs of multiple users of the public right-of-way.

♦ An interconnected street system that provides multiple linkages within and between communities.

♦ Vehicle congestion relief."

The proposed connection does not relieve the vehicle congestion as stated as a Goal in the General Plan. Encouraging mass transportation would in fact relieve congestion without the proposed road connection.

♦ Safe and efficient street design that minimizes environmental and neighborhood impacts."

The proposed connection does not allow safe and efficient street design as it will negatively impact traffic and other environmental concerns. The road connection does not minimize environmental impact of the neighborhood of Serra Mesa. This is not a comment but a fact based on numbers in the data, please include.

♦ Well maintained streets.

Discussion

Streets and freeways comprise the framework of our transportation system and play a major role in shaping the form of the City. The quality of the roadway system affects us whether we travel by automobile, transit, bicycle, or foot, and influences which mode of travel we choose."

By choosing to only support transit, bicycle or foot alternatives the city is encouraging these modes of travel. If the road connection were to be approved it would in effect be encouraging automobile traffic instead, which is not consistent with the general plan.

Please correct false statements and include counter argument based on evidence in the data.

Quoted from the San Diego General Plan

“The RTP calls for efficiency improvements using system and transportation demand management strategies, transit service improvements, bicycling and walking infrastructure improvements, and support for transit-oriented design and development.

A finer level of street system details may be provided at the community plan level.

Adopted community plans specify the planned system of classified streets within the local community.

Travelers benefit from shorter trips and multiple route options, and are more likely to walk or bicycle if distances are short. While vehicle congestion relief is an overall goal of the Mobility Element, the degree of acceptable vehicle congestion will vary in different locations based on the function of the roadway and the desired community character. Decisions that must balance the benefits and impacts of designing our transportation system for multiple modes of transportation will need to be made at the community plan or project level.”

As stated in the General Plan, vehicle congestions relief is the overall goal, travelers are more likely to walk or bicycle if distances are short such as to an adjacent community and this is to be done at the community plan project level not dictated by larger government. The desired community character is not achieved by this proposed connection as shown by the Serra Mesa Planning Group’s 10-0 vote against the connection.

“ME-C.1 b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time.

e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.” The General Plan states that public input should be increased in decision-making and public input is to reject the connection and please do not waste any more tax dollars on this issue ever again. Mission Valley Planning Group did not support the connection and Serra Mesa Planning Group strongly opposed the connection. Will public input and community group’s recommendations be considered in the approval of this DEIR? Will this issue continue to be brought up? When will the wasted tax dollars stop? Why are the community’s wishes not being heard? Will the Mission Valley Community Plan be updated to reflect no road connection to stop this government waste for an unwanted, unneeded, detrimental connection?

“ME-C.3 b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be designed to control traffic volumes and speeds through residential neighborhoods.”

These collector roads are specifically for routes to schools, parks, and village centers not to gain access to a major freeway that would not control traffic volumes nor speed through Serra Mesa’s or Mission Valley’s residential neighborhoods. Will the DEIR include this contradiction in the San Diego General Plan?

“d. Where possible, design or redesign the street network, so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.”

Allowing vehicular traffic at this proposed connection site would form barriers to pedestrian traffic and community cohesiveness with increased traffic congestion, noise and air pollution discouraging pedestrian traffic. All information found in the General Plan support this statement. Will this be added to the DEIR? If not, why not?

“Transportation/Circulation and Parking

How is the traffic not going to be redistributed into Phyllis Place if that is the intersection that the proposed changes will occur? Phyllis Place is the only entrance and exit for an entirely residential community and would be directly impacted by the proposed CPA and the delays on 805 onramps, backing up onto Phyllis Place, directly impeding traffic flow on Phyllis Place.

“Noise”

Why was it not included that the noise in Civita would still be less without the road connection? As traffic from Serra Mesa, Mission Valley East, Mission City, North Park and University Heights between Mission Center Road and Mission Village drive would all have direct access to 805 creating noise and a bottle neck effect on Franklin Ridge Road for all the Civita residents as well?

“Project Objectives

In quotations are the objectives of the proposed CPA, followed by reasons why the No Project Alternative would still meet proposed DEIR objectives and better than proposed CPA.

“The objectives of the proposed CPA are to:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.

The inconsistency between community plans would be resolved if the Mission Valley plan was amended. Not requiring Serra Mesa’s Plan to be altered and still meeting the objectives.

2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.

3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.

The circulation would be improved by the pedestrian and bicycle path through the park that is already planned and located where the CPA is proposed. Also by the access on Kaplan Drive that was not mentioned in the DEIR. Residents and frequent users of the Mission Valley Area are encouraged to use Mass Transportation/Transit, walk or bike into Mission Valley to avoid driving in traffic. Therefore improving overall circulation and increasing the use of mass transit thus alleviating traffic congestion and improving navigational efficiency to and from local freeway on off ramps for surrounding areas. The proposed CPA does not prove to alleviate traffic congestion yet does make it worse than doing nothing.

4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

No Project Alternative would not increase vehicular traffic on Phyllis Place and allow current emergency access from Serra Mesa to Civita to be more efficient with faster response times than at high traffic times if the connection were approved. There is currently an evacuation route for the residents of Serra Mesa and Civita to the West of proposed road connection which would experience less traffic during an evacuation than if the proposed road was approved. Why was Kaplan Drive not mentioned or considered in this DEIR? It has been in existence for years and is in Appendix A under letters written to this DEIR yet it was not used to show existing emergency or evacuation access. Would the inclusion of this information change the recommendation of this DEIR? Why was the Kaplan road connection left out of the study?

5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

The No Project Alternative would allow safer travel conditions for motorists, cyclists, and pedestrians, separating vehicular traffic on the main roads from pedestrian and cyclist's paths going through the park on a designated, safer, quieter, less congested, less polluted path, preserving the desired community character and minimizing environmental and neighborhood impacts. See:

<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/adoptedmobilityelem2cg.pdf> C. Street and Freeway System Mobility Element Discussion

- “Implement the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities.”

The General Plan and Master Bicycle Master Plan would still be implemented without the connection because interconnectivity between communities would be achieved through the current path attached to the west of Civita at Kaplan Drive connecting Mission Valley and Serra Mesa by foot and bike along with the added bike and pedestrian path that will be attached to Civita on Phyllis Place already planned and approved, yet not mentioned in this DEIR. Why was it not mentioned? Will it be mentioned? If not, why not mention because it exists and it was not considered per CEQA? Connectivity between the communities is already achieved for community activities as walking and biking short distances are conducive to community activities. A road would cause a through fare to access 805 causing a detriment to the neighborhoods and safety of the current community.

“Conclusion”

As proven above the No Project Alternative would eliminate potentially significant environment impacts associated with the proposed CPA as well as save tax payers money. All of the objectives are already met except plan inconsistency which is an unfair objective as it is too narrowly focused and could be met by a plan amendment to Mission Valley. Please show substantial evidence, as shown in this letter, to support the inappropriately drawn conclusion as per CEQA. Will this be done? If not, why not?

“Bicycle, Pedestrian, and Emergency Access Only Alternative

The proposed Alternative would still require an amendment to the Serra Mesa Community Plan since the current Community Plan does not provide for any road connection from Phyllis Place to the Mission Valley Community Plan.”

There is already a complete, usable Emergency, bicycle, pedestrian connection between Serra Mesa and Mission Valley though the housing development in Serra Mesa to the west of Phyllis Place at the end of Kaplan Drive and Aperture Circle. It is a known connection why is it left out? Is the omission convenient to discredit the No Project Alternative?

“Land Use”

Mission Valley Plan can be amended to not include the street connection, why was this alternative discounted? It is false to say that the impacts on land use would be greater than proposed project, where are the facts? A pedestrian and bike path would be a better use of land and be more consistent with the General Plan and the Serra Mesa Plan, please prove otherwise with facts. Facts to support the No Project Alternative are contained in this letter and have been quoted from the General Plan. It is inappropriate to discount an alternative based on narrow objectives that are hiding the underlying purpose of the project which is to build the road connection. The objectives are too narrow and the DEIR’s treatment of alternatives are inadequate because they unreasonably limit alternatives analysis per CEQA. Will the conclusion be drawn that the No Project Alternative is superior for land use and will be greater than the proposed project? If not, why not?

“Transportation/Circulation and Parking”

This alternative would result in a similar array of impacts as those disclosed for the CPA. As shown, the Bicycle, Pedestrian and Emergency Access Only Alternative would improve the time traveled associated with Hospitals and Fire. Because private vehicles would be prohibited, the improvements in travel time to non-emergency facilities would not occur. As compared to the proposed CPA, the Bicycle, Pedestrian and Emergency Access Only Alternative would address the emergency access and bike and pedestrian goals, but would not meet the project goals.

Community Access Travel Times

Facility Type Representative Accessibility Time Travel (min.) Without Connection With

Connection Hospitals 39 31

Fire Department 42 32

Schools 153 135

Libraries 40 32

Shopping Centers 69 57

Parks 58 50”

Where did these numbers come from? At what locations are the travel times from? No place in Serra Mesa takes that long to get anywhere now; how can it be shorter with more traffic and cars on the road? How are the times estimated? Fire and emergency responses are around 6 minutes based on the average fire department response times, so why does it say 42 min on the table found in 9-1?

“2.5.1 Average response times for Serra Mesa are 5 minutes 51 seconds for the primary engine and 6 minutes 21 seconds for the secondary truck (City of San Diego 2012a). Average response times for West Mission Valley are 6 minutes and 40 seconds (City of San Diego 2013a).”

These times are within normal limits, how do the times of 42 and 32 minutes correlate with the actual response times? Why was the average response times not used in this analysis?

*** “Therefore, the traffic study concluded there was limited additional benefit to these more than 200 homes for evacuation by having a road connection.” ***

This is a statement from the DEIR stating there was limited addition benefit of evacuation. Can it also be concluded there is limited addition benefit to the time travel with or without the connection? How is this table significant? What does it represent? Is it generalizable over the entire Community or only the two locations studied? Will this table be removed for lack of relevancy? If not, why not? There are two hospitals in Serra Mesa and both are under 39 minutes to get to so where are these numbers from and how is it figured that it would be faster if there were more delays to get onto 805 that services these hospitals? If the ramp delays are 43 minutes like projected, will this also add 43 minutes to the travel times for community access? Why was this not factored into the time tables? What routes were taken to get to the community access locations? What time of day, day of the week, month etc. was used to make these times? Was traffic factored in? Will it be? Please discuss.

“Project Objectives

The no project alternative would not resolve the first objective: inconsistency between two community plans; although this could be done by amending the Mission Valley Plan instead. Amending the plan should be done to update the inferior plan, not just to make the plans the same no matter the negative results to the community. Don't plans exist to protect the community and not to just make them the same? The points under the second and third objective are the most important to the community environment, and less about the rhetoric, and would be met. Is this correct? Will this be update? If not, why not? Please provide data per CEQA. As circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan would all improve without the propose CPA. Only one objective would be met with the propose CPA; that could be met with an amendment to the Mission Valley plan instead.

“Conclusion”

Under the no project alternative significant impacts would be reduced and avoided when compared to the proposed CPA: circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan would all improve without the propose CPA. All of which would be significantly negatively impacted with proposed CPA as stated under significant, unavoidable, unmitigable impacts based on this DEIR. The same physical footprint does not represent the same environmental impact please address this as the issue is environmental impact not physical impact. Transportation/ circulation and parking would not be the same in any way under the No Project Alternative as the Mission Valley Community grows the existing plan for a pedestrian and cycling path that has been approved in both community plans would meet many of the project goals: improve circulation, traffic, safety, emergency efficiency, General and Bicycle Master Plan by increasing use of alternative transportation and intercommunity connectivity. Please correct false statements based on the information in this DEIR as the conclusions are false.

“Summary”

The summaries of impacts are not true statements. Please discuss the facts that led to these conclusions and included Kaplan Drive and the trail connections. The project objectives include reducing traffic, how can the proposed project meet that goal with data in appendix C stating the opposite? How can a No Project Alternative have similar impact to

transportation or any environmental issue when there would be no increase to traffic, circulation and parking, no increase to Noise, Hydrology and Water quality? The No Project Alternative can meet all the objectives when including a plan amendment change to Mission Valley's Plan. Please explain why this is not true? Similar impacts are not accurate as traffic and circulation are proved to be better with the No Project Alternative see table below:

Extracted from Table 7-1 Significant Impact Comparison

Without Franklin Ridge Road Connection	With Franklin Ridge Road Connection
Segmental Impacts:	Segmental Impacts:
	Phyllis Place from Franklin Ridge Road to I-805 SB Ramp
	Franklin Ridge Road from Via Alta to Civita Boulevard
Intersection Impacts:	Intersection Impacts:
Mission Center Road / Murray Ridge Road	Murray Ridge Road / Sandrock Road
	Murray Ridge Road / I-805 NB ramp
	Via Alta / Franklin Ridge Road
Freeway Ramp Meter Impacts:	Freeway Ramp Meter Impacts:
	I-805 NB On-Ramp at Murray Ridge Road
	I-805 SB On-Ramp at Murray Ridge Road

Appendix C

***Shown are the significant impacts that are not the same with or with the connection. This proves overwhelming significant impacts with Connection verse only Mission Center Road/ Murry Ridge Road without. Will this table be included? Does this prove beyond a shadow of a doubt that the traffic/ circulation and congestion will not be similar and in fact will be significantly better with the connection? If not, why not? Please prove otherwise and prove data to support conclusion, otherwise please change to be correct in conclusion based on this data.**

Please show data that conclusions were drawn from? Please remove incorrect tables or correct as the table are false based on the fact that Kaplan Drive was not taken into consideration. The circulation linages would still be implemented in accordance with the approved plans for a pedestrian and cycling path through the Park and at Kaplan Drive linking the communities without the connection.

Prove how alternatives would have more environmental impacts on land use. How would the alternatives not comply with the General Plan when it would decrease the amount of vehicular traffic and increase emergency access?

The impacts on noise would not be less than significant with mitigation. Although it may be possible to mitigate the noise during construction of the road by working within daytime hours, the traffic noise once constructed would significantly increase due to increased traffic and the 10% steep grade that is not mitigable after construction that would continue to have significant negative impacts on the community. Lastly, most of the project objectives would not be met, as the proposed CPA would not improve circulation, alleviate

traffic congestion, efficiency, allow safety for motorists, cyclists, and pedestrians along the street, improve emergency access or evacuation routes where as both alternatives would meet all objectives except resolving the inconsistencies between the two community plans, which can be done by amending the Mission Valley Plan as mentioned. How are impacts to traffic, circulation and parking remaining significant and unavoidable meeting the project objectives of decreasing traffic and improving circulation? Please discuss how the objects are met.

Just because the No Project Alternative would not resolve the inconsistency between the Mission Valley and Serra Mesa Community Plans does not mean that it would have a greater environmental impact than the proposed project. Correlation does not equal causation. It is impossible and has not been proven in this DEIR that the impact on transportation/circulation and Parking that is stated to be “significant and unavoidable” under the proposed project would also be similarly significant and unavoidable in the No Project Alternative. As the No Project Alternative does not increase wait times to 43 mins for the 805 ramp and allows residential traffic to the west of proposed project an uncongested entrance and exit from and to the community unlike proposed CPA. No Project Alternative does meet most project objectives; Doesn’t it? The No Project Alternative would improve circulation, alleviate traffic congestion, efficiency, allow safety for motorists, cyclists, and pedestrians along the street and improve emergency access and evacuation routes by promoting walking and cycling paths instead of vehicular traffic and allowing open road ways for the current emergency and evacuation routes to be accessed in the event they are needed. Prove otherwise and correct incorrect information in tables.

The plan inconsistencies are not part of the environmental impact but rather just words on paper that can be amended in the favor of the most environmentally friendly outcome which is not connecting the roads.

“All mitigation measures contained in the Environmental Impact Report shall be made conditions of the project as may be further described below.”

‘All mitigations shall be conditions’ is a statement that is contradictory to the projects objective the City’s General Plan and both community plans. For example the mitigation below is not recommended and impact would remain significant and unavoidable either by eliminating bike lanes and parking for road widening or by requiring removal of residences on both sides of Murry Ridge road. If “ALL MITIGATIONS” are conditions of the project the project must not go through based on the findings of this DEIR.

“Murray Ridge Road from Mission Center Road to Pinecrest Avenue: a. Murray Ridge Road from Mission Center Road Pinecrest Avenue shall be restriped consistent with a 4-lane Collector.
i. Currently, Murray Ridge Road provides Class II bike facilities and onstreet parking. The proposed mitigation would either repurpose the existing right of way to provide four travel lanes by eliminating the bike lanes and on-street parking, or widen the roadway to accommodate four travel lanes and maintain Class II bike facilities and on-street parking. Widening the roadway would require removal of residences on both the east and west sides of Murray Ridge Road along the entire stretch of roadway segment. Since this mitigation would be contrary to the existing guidelines (General Plan, Bike Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan), it is not recommended, and the impact would remain significant and unavoidable.”

The General, Bike, Pedestrian and Serra Mesa Plans do not supports many of the conditional mitigations, eliminating bike lanes, parking and homes. Therefore the No Project Alternative is environmentally superior to the proposed CPA.

If all mitigations are required as stated in DEIR and most are not recommended and would remain significant and unavoidable why would the DEIR recommend the proposed CPA as the superior alternative at all? Why is it stated on tables that alternatives have “Similar impacts” when the ALL mitigations are conditions of the project and most mitigation under transportation and circulation are “not recommended and would remain significant and unavoidable.”? Tables also state the proposed project “Meets Most Project Objectives?” After conditional mitigations the project objectives are no longer met and in actuality the proposal is less complaint with the City’s General Plan and Community Plans after conditional mitigations than the No Project Alternative.

For example

- 6 of the 19 mitigations violate City land use and mobility policies.
- 8 of the 19 mitigations analyzed assume the mitigations will not occur.
- 10 of the 19 mitigations which are conditions of approval would remain “Significant and Unavoidable.” DEIR 38-42/432

The DEIR contradicts itself in all places in which it states that the propose CPA would be recommended or would benefit the communities circulation/ traffic, General Plans, Community Plans or any other place it states a positive impact based on the results of the mitigation conditions and the finding in other sections. Please correct to be in compliance with CEQA.

Appendix A

Where are the answers to the questions from 2012? The connection at Kaplan was mentioned in this Appendix and nowhere else. Why was Kaplan Drive and the trail south of Phyllis not included in the analysis when it was known about because it is published in the Appendix? Did anyone read the letters the appendix? Issues that were discussed in the appendix are still not addressed it this DEIR.

Caltrans wrote a letter included in Appendix A stating that traffic data should not be more than 2 years old. The traffic data is dated Feb 2012 which is not within the last 2 years, why was this data not updated? Will the data be updated?

Appendix C

Alternatives were not well studied or thought out. Why were no mitigations proposed for the No Project Alternative or the alternative with pedestrian, cyclist and emergency only in order to fully explain the alternatives?

The DEIR does not analyze any connections to Mission Valley other than Mission Center Road going north. Were other connection studied to be in compliance with CEQA? How can decrease traffic and congestion be shown if it was not studied? Other factors that directly effect this traffic are the onramps and connections of the 163, Mission Center Road connection to the 8 that gives access to the 805, Texas which is a major intersection becoming Qualcomm Way becoming Franklin Ridge Road. Currently from Texas there is no access to the 805 from the 8 which will be a huge impact on traffic from neighboring

communities currently being mitigated by multiple route options besides the 805 that give relief to the 805 in this area. Mission Village Drive is not analyzed even though it also feeds onto Murry Ridge Road as an access to 805 from Mission Valley.

Freeway Mainline Conditions The existing freeway analysis is summarized as shown currently, the following freeway segment does not operate at LOS D or better:

x I-805 N from I-8 to Mesa College Drive On-Ramp – LOS F (AM)

x I-805 N from Mesa College Drive On-Ramp to SR-163 – LOS F (AM)

x I-805 S from Mesa College Drive On-Ramp to Murray Ridge Road – LOS F (PM)

Why wasn't allowing access North on either the 163 and/or the 805 studied to relieve the currently failing freeway segments at Mesa College Drive? What the traffic coming from Mesa College Drive exiting on Phyllis Place and Murry Ridge Road to turn around to go North studied? As a large number of cars go South on 805 and exit to go back on the freeway in order to go North because there is no North option at Mesa College Drive. Mesa College Drive backs up for hours every day, and has multiple exits. Would Phyllis Place, Via Alta and Franklin Ridge Road also back up for hours every day?

Already 805 is operating at an F, the reason there is traffic on Mission Center Road is because 805 is an F not because there is not enough access to the 805. Allowing more access to the 805 would create even further congestion. Is this correct? Why can't Mission Valley and Serra Mesa be connected through streets not in residential areas? Why aren't other connections being studied? The objective is to further connect the two communities not to get Mission Valley traffic onto the 805 through residential neighborhoods; so why does the road have to go through residential neighborhoods and single outlet cul-de-sacs against the General and Community plans? Please explain reasoning to why the road is only proposed to connect to Phyllis Place and not another location? When the Mission Valley Plan was created to include the road connection was the Civita development considered? Was Civita in the Community Plan? Or was the road planned to go through a Rock Quarry with no residences which would have been in line with the General and Community Plans? Why is the Mission Valley Plan not being updated to not include the road based on the new development that was not already in the plans when the original road connection was proposed? Will alternatives be evaluated per CEQA? If not why not?

Current conditions are already an F to enter onto 805 NB and a D to enter SB, adding a connection will not speed up traffic on the 805. The problem is the 805 not the road connection. Adding more traffic to the bridge over 805 from Franklin Ridge Road will not help the traffic coming from the Murry Ridge Road as both roads are going to the same place: the 805. The connection is posed to not increase traffic on Mission Center Road by 10,786 cars while adding 32,120 cars to Phyllis Place. Adding a net of 21,334 more cars trying to get onto the 805 and effectively backing up Mission Center road and trapping the Abbots Hill community from exiting or having emergency services enter. Please explain how adding 21,334 cars per day into the neighborhoods of Civita and Phyllis Place will decrease traffic and congestion for Serra Mesa or Mission Valley as proposed? Will the 805 run any smoother or not remain an LOS F with 21,334 more cars trying to use it? Will the community character of walkable neighborhoods be impacted? The following is a marketing promo for Civita all the words are speaking about the character of the

neighborhood and why people are buying into the Walkable neighborhood. The promo states “walk everywhere...and experience the world at 3mph”. How will the community character not be affected when there are 35,000 cars traveling through the community, decreasing walkability and safety? Please explain and correct in DEIR.

MARKETING PROMO FOR CIVITA BY SUDBERRY YOUTUBE VIDEO POSTED
12/10/2011 <https://www.youtube.com/watch?v=mM6F8u8RdQY>

“Ditch the Car...

And Get Your Walk On...

CIVITA, The new WALK-EVERYWHERE Community.

Urban Life, Village Charm,

Places to Gather and Connect

Shop till you drop

Flirt over drinks

Chill in the Park

Parks, Playgrounds, Trails

Different kinds of places

Room to Jump Run and Play

For different kinds of people

Cool Sustainable Neighborhoods

Civic Spaces

Stylist shops

Where Outdoor living in King

Gardens, Patios, Decks

Walk to the Trolley

Minutes to Fashion Valley, Beaches, Little Italy, Downtown

Fresh Ideas for Living Green

Hybrid Cars you can share

Big Community Garden

Everybody's Talking Green – WE'RE WALKING IT

Water Wise, Energy Smart, Recycling Minded, LEED Gold

So Stop and Smell the Flowers...

And experience the world at 3 MPH

Where the Journey is every bit as fun as the destination.

CIVITA by Sudberry Properties

SAN DIEGO'S NEXT GREAT URBAN VILLAGE”

CEQA Guidelines: the following are quotes from CEQA and how the guidelines are not met:

“A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid decision makers in preparing findings or statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

The objectives are not clear enough to develop a reasonable range of alternatives as the main objective is to resolve inconsistency between community plans when the underlying purpose is to actually build a road connection. If they actual underlying purpose of the

road connection was written as the object which is required by CEQA other alternatives to a road connection would have been studied and a more reasonable alternatives would have been found.

“ADEQUATE PROJECT OBJECTIVES

- ☐ When overly broad, objectives cannot help focus alternatives
- ☐ When objectives are defined too narrowly, an EIR’s treatment of alternatives may be inadequate, because they unreasonably limit alternatives analyses.

Do not focus on achieving certain approvals as an objective

- ☐ This may hide the underlying environmental purpose for a project
- ☐ Reveal underlying project purposes in objectives”

The objective of making plans consistent is too narrow and could be done by changing Mission Valley's Plan. This inappropriate narrow objective is the only reason that the alternatives were not superior and more alternatives were not considered. Please correct objectives to accurately reflect the underlying purpose of this DEIR as required by CEQA.

“An EIR shall describe a range of reasonable alternatives to 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. . . .”

The alternatives would substantially lessen impacts although the DEIR does not state the truth or back up conclusions with facts.

“Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059 EIR for update of City’s General Plan did not consider “reduced development alternative,” even though approved General Plan would have SU impacts on agricultural land. City argued EIR did not need to consider such an alternative it would be inconsistent with the City’s objective to accommodate future demand for housing and employment. Held: **EIR inadequate** because a “reduced development alternative” would meet most of the City’s other objectives.

Over development of Mission Valley is the problem, reducing development would be a reasonable alternative even if inconsistent with the General Plan. Why was reducing development not considered an alternative to decrease traffic, congestion and parking as it would also meet underlying project objectives?

“Basic requirement: if an agency approves a project that may have one or more significant effects on the environment, the agency must adopt one or more of the following findings with respect to each significant impact:

- (1) Changes or alterations have been required in, or incorporated into such project that mitigate or avoid the significant environmental effects thereof as identified in the completed environmental impact report.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.
- (3) Specific economic, social, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation or alternatives. (Pub. Resources Code, § 21081, subd. (a); CEQA Guidelines, § 15091)”

The mitigations do not avoid significant environmental impacts and are not mitigable below significant impact and the other two don't really apply. Therefore, the agency may not approve the propose CPA under the basic requirements of CEQA. Will this document be disapproved? How can it be insured that the connection does not waste anymore funds being investigated?

“Findings need to clearly state why alternatives or mitigation that would avoid significant unavoidable effects are infeasible.” Many places in the DEIR reasons why alternatives are infeasible which is not in compliance with CEQA.

“☐ The Statement of Overriding Considerations would be clear and convincing. Why is it acceptable to approve a project with significant an unavoidable impacts?

What are the proposed projects overriding considerations to allow approval of the DEIR? They are not clear nor convincing as per CEAQ regulations. Will the conclusions be updated to reflect the data and comply with CEQA, If not, why not?

“☐ Decision-makers may have a different view of the same issues and they can make a contrary finding, as long as those decisions are supported by substantial evidence in the record.”

Where is the support of substantial evidence in record in this DEIR? Were conclusions drawn from evidence? Where is the evidence? Will it be included?

“ECONOMIC INFEASIBILITY OF ALTERNATIVES

☐ Test is not whether an alternative costs more, or whether proponent can afford it, but whether cost is so much greater that a reasonably prudent proponent would not proceed (Uphold Our Heritage v. Town of Woodside [2007]).

☐ Substantial evidence of economic infeasibility is key. Prepare and include an economic report in the record (The Flanders Foundation v. City of Carmel-bythe-Sea [2012]).” Please prepare and include an economic report in the record.

Is the proposed project economically feasible when the underlying environmental purpose for a project is considered? It was stated in the DEIR that there is no money for the project, why is a project proposed that does not have an economic viability?

“The Statement of Overriding Considerations would be clear and convincing. Why is it acceptable to approve a project with significant an unavoidable impacts?”

Where is the statement of Overriding Considerations that is clear and convincing? The proposed project has significant and unavoidable impacts and therefore must contain a statement of overriding considerations, please provide with data.

Other Questions regarding environmental impacts of DEIR. please answer and show data and fact to show where answers came from:

-Why was Mission Village Drive not considered as a connection between the two communities?

-Why did the proposal not acknowledge the existing connection between Mission Valley and Serra Mesa though Mission Village Drive?

-Why was amending the Mission Valley plan only mentioned as an alternative and not investigated as is required, please explain?

-If the amendment was investigated please provide data showing such investigation and why it is not the superior alternative?

- Explain how 43 minute delays at 805 and 54.6 minute delays with mitigation on Franklin Ridge Road make the proposed connection have a similar impact, when the no road connection shows less than 15 minutes within acceptable range even in the year 2035.
- Why isn't it a bigger benefit to take cars off the road for pedestrians and bike with a traffic free trail?
- How is adding vehicular traffic to the approved bike and pedestrian path through the park on Phyllis Place an improvement for the Bike Master Plan?
- Why isn't improving mass transit studied as an alternative to the road connection?
- Does the 4 lane connector have a center emergency lane?
- This has been denied twice, why are we now wasting tax payer dollars on something that the community of Serra Mesa still does not support?
- Why are we incurring more expense to the city rehashing failed initiatives instead of improving 163 or the 8 on ramps?
- Why is the city spending tax dollars on a project that has already been rejected twice?
- How much does the proposed project cost the city tax payers?
- How much do the proposed mitigations cost the city tax payers?
- Why have approved mitigations on entrance and exits of 163 not been done to alleviate traffic congestion in Mission Valley?
- Why did the proposal not study entrances and exits onto the 163, 8 and 15 freeways as alternatives to relieve traffic congestion and other factor in the DEIR?
- Why were the on and off ramps of the 163, 15 and 8 not studied as they also impact the circulation and traffic of Mission Valley and could be used to prove or disprove congestion relief with proposed project?
- The 805 has LOS of F currently, how can more entrances possibly help elevate traffic congestion?
- Why was increasing lanes on the 805 studied as an alternative?
- How will increased traffic with road connection improve emergency services when there is no traffic now and emergency access between communities?
- What are the impacts on roads in Mission Valley if the connection is not approved?
- Why are plans such as improvements to Ruffin Road not being considered as alternatives when they have been on the General Plans for decades?
- Why isn't the use or improvement to transit an alternative when Mission Valley Density was approved because of proximity to transit?
- Quarry Falls now Civita was built as a walk friendly area, how would more traffic affect the community characteristics?
- How long will it take for Abbotts Hill residents to get emergency services during traffic times when both exits are backed up with traffic? Current times are 5 minutes 51 seconds for primary engine (City of San Diego 2012a, 2.5 Emergency services)
- Explain the Community Access Travel Times Table; the numbers are very high for with and without connection.
- Why were traffic delays not calculated?
- Birdland has more than 3 entrances and exits and stills clogs up with traffic for hours every day, what is different about this connection and the way it will affect the residential communities of the surrounding area?

- Was the school on Via Alta considered in this DEIR, if not please explain why not? Children will be crossing the street with close to 35,000 cars per day, how will this impact be avoided? Please include.
 - Why is Mission Valley's Plan not being studied to be amended instead, when it is conflicting with itself?
 - Not a reasonable range of alternatives. Why not use the unnamed road on the East side of 805 that attached to Friars?
 - Why not allow access to the 805 when getting on the 8 freeways at Qualcomm and Texas Street? Currently Mission Center Road and Fairmount Ave are overloaded as the only access to the 805 from the 8 freeway in Mission Valley. Mission Valley could decrease through traffic in Mission Valley if another onramp to the 805 from the 8 was created.
 - Was making Civita a Gated community considered?
 - Was a smaller access road considered instead of a 4 lane major road considered to create traffic calming?
 - The Dog Park in Civita was not mentioned at the intersection of Franklin and Via Alta? -Why was this not discussed? Would it be a sensitive receptor? Will it be safe for people to cross the street with no crosswalks to go to the dog park with dogs?
 - Will it be a safe place to walk dogs and cross the street with 35,000 cars a day?
 - Why were City View Retirement Apartments on Phyllis Place not considered sensitive receptors? Why were they not studied? Will they be? If not why not?
- Why are the 2012 letters included in the DEIR and not the letters that were written in 2016?

Other Corrections that need to be made to the DEIR. Will they be made? If not, why not?:

- Tables say "without connection" but it should say "with connection" as it does in the table.
- Incorrect labeling on Tables: Delay needs to be labeled in (min) and not left blank or in sec.
- DEIR Table Labels delay in (sec.), incorrect should be in (mins.) for example page 170 5.2-5, Page 193, Page 206 5.2-21,
- DEIR Table titles is 'with' and 'without' but only shows 'existing' and 'with', not 'without'.
- Chart of response times is not clear on where that information came from, seems impossible and could walk in the times stated on the chart.

Thank you for your consideration,

Bryce Niceswanger
 2161 Ainsley Rd
 San Diego CA 92123

Letter DD: Bryce Niceswanger

DD-1: This comment provides a brief background of Resolution 304297 and notes that the final decision maker on whether to approve or disapprove the project is the City Council. This comment does not address the adequacy of the DEIR.

DD-2: This comment expresses an opinion that police and fire response times would be slower with connection due to extremely heavy traffic and to a community that only has one egress and ingress. It states that an emergency route already exists at Kaplan Drive and Aperture Circle in the proposed study area and has been ignored. The comment also states that pedestrian and bicycle access would not be improved by the proposed project, and that the analysis fails to support the road connection or any of the reasons for the community plan amendment and the project should be denied.

Please see Section 5.2, *Transportation and Circulation*, of the DEIR. Specifically, Table 5.2-23 provides travel times to hospitals and fire departments, as well as other community facilities, from two reference points in the project area. As noted in the table, drive times to/from hospitals with the project in place would decrease travel time by 7 minutes compared to conditions without the project. Travel times to/from the nearest fire stations would decrease by 10 minutes. As such, the analysis concluded that drive times to community facilities, including hospitals and fire stations, would decrease with the project in place compared to conditions that would not include the project.

Moreover, as the commenter indicates, emergency access exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive and that Kaplan Drive provides bicycle and pedestrian access. This existing condition, while used in the emergency response analysis in Section 5.2, *Transportation and Circulation*, has been clarified in the FEIR to make it more apparent that existing emergency access is provided via Kaplan Drive. The addition of this information does not affect the conclusions reached within the DEIR because this emergency access road was included in the emergency response analysis.

In addition, as detailed within Section 7.7 of the DEIR, in accordance with the City's CEQA Significance Determination Thresholds, the following issue provides guidance to determine potential significance of impacts on public services and facilities: "Would the proposed project have an effect upon, or result in a need for new or modified government services in, any of the following areas: fire/life safety protection; police protection; schools; maintenance of public facilities, including roads, parks, or other recreational facilities; and libraries?" As further detailed within Section 7.7, the proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for fire-rescue or police services.

The roadway connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not

as easily accessible for emergency responders within the area surrounding the proposed roadway connection, nor is it as close to regional transportation facilities (e.g., I-805).

Concerning pedestrian and bike accessibility, the proposed roadway connection provides an additional, and more direct route from the southeastern portion of Serra Mesa (namely Phyllis Place/Murray Ridge Road), for cyclists and pedestrians who are able to connect more directly with bike lanes on Via Alta and Franklin Ridge Road.

Beyond clarifying language being added to the FEIR related to the existing Kaplan Drive, no additional changes to the FEIR are required in response to this comment.

DD-3: This comment states that the attached document is the commenter's personal letter to the Planning Department and requests that the City respond to the comments therein. This is an introductory comment that does not address the adequacy of the DEIR.

DD-4: This comment states opposition to the project and states that the project would increase traffic. The comment also indicates that the Serra Mesa Planning Group and other community residents are against the project.

The proposed project would not generate any traffic, although it would redistribute traffic within the area analyzed by the traffic study (see Section 5.2, *Transportation and Circulation*, of the DEIR). This comment does not address the adequacy of the DEIR and only expresses opposition to the project.

DD-5: The commenter suggests that the project is promising in theory, but, as analyzed in the DEIR, there would be immitigable delays at the I-805 on-ramps.

The DEIR does identify a significant impact at the I-805 SB on-ramp at Murray Ridge Road in the Long-Term condition (Year 2035); however, the impact would be mitigated to less than significant, as identified in Section 5.2.5.2 of the DEIR. Moreover, it is important to note that the project does not create any new traffic itself; rather, the project provides an additional connection to the Serra Mesa Community and Mission Valley communities that provides additional navigational options for drivers, cyclists, and pedestrians. In addition, although there would be some roads and intersections in the vicinity that would experience more delay than with the project, other intersections and roadways would see a decrease in delays. Much of this additional delay with the project would be from the traffic generated by the future development of the Civita community, which will ultimately include up to 4,780 residential units and over 1,200,000 square feet of office/business park, retail, and commercial businesses. The roadway connection would provide easier access to and from existing and future development, including Civita. As such, if there is additional delay in one location, there would be a decrease in another area. Moreover, the project would reduce vehicle miles traveled compared to conditions without the project, which would result in lower greenhouse gas emissions and air quality emissions. This comment does not specifically address the adequacy of the DEIR.

DD-6: This comment states that Serra Mesa and Mission Valley are connected by Mission Center Road in the west and at Mission Village Drive in the east. This comment is acknowledged but does not address the adequacy of the DEIR.

The comment, which is similar to Comment DD-2, also states that emergency access between Kaplan Drive and Aperture Circle exists and that there will be a bicycle and pedestrian path connecting

Mission Valley to Serra Mesa through the Park South of Phyllis Place. Please see the response to comment DD-2.

This comment also expresses the opinion that the project would split the planned park in two parts, rendering the space less useable and endangering pedestrians and bicyclists with a busy four-lane road and intersection, and that this safety issue was not mentioned in the DEIR.

The DEIR details the proposed project's compatibility with the proposed Phyllis Place Park and the Quarry Falls Park. As detailed in Section 5.4.1.3 of the DEIR: "Although the roadway would require a public right-of-way area that would interrupt the park, the park is a linear design that would still remain connected to the overall system using a pedestrian crossing at the intersection. The proposed project would divide the park by placing a roadway in between the two portions of it; however, this would not represent a significant impact on the environment, as the proposed project would not result in hazards to pedestrians/park users. The roadway itself would be designed in accordance with applicable City regulations, including the Street Design Manual (City of San Diego 2002) and the intersection at Phyllis Place would be signalized and would include a signalized pedestrian crossing. Therefore, impacts would be less than significant." It is acknowledged therein that the proposed project would somewhat divide the park, however, this would not represent a significant impact related to aesthetics. The park has not yet been constructed. Although the park would be slightly interrupted in continuity, this would not represent a significant impact related to aesthetics. No revisions to the FEIR are warranted as a result of this comment.

DD-7: This comment expresses the opinion on how the proposed project would affect traffic and circulation patterns. Specifically, the commenter points out that the roadway would support heavy commercial traffic from Mission Valley and Texas Street up through the new residential neighborhood of Civita onto Phyllis Place in Serra Mesa in order to get to the I-805 freeway. The commenter suggests that the roadways cannot support more traffic.

Traffic impacts associated with the proposed project are detailed in Section 5.2, *Transportation and Circulation*, of the DEIR. This comment is general in nature and does not address the adequacy of the DEIR. No changes to the FEIR are required in response to this comment.

DD-8: This comment suggests that the project would not benefit the residents of Mission Valley and Serra Mesa and that the City should not spend any more money analyzing the roadway connection.

Comments related to the opinion of the commenter and how the City has expended funds do not specifically address the adequacy of the DEIR and the environmental analysis contained therein. Moreover, the City Council will consider the environmental impacts of the project and will weigh the benefits of the project before making a decision to approve or deny the project.

It also suggests that removing the roadway connection from the Mission Valley Community Plan would save the city millions of dollars, increase walkability and make both plans consistent, meeting the DEIR objectives.

As detailed within Section 9.4.1.2 of the DEIR, the No Build/Remove from Mission Valley Community Plan Alternative would not include the construction and operation of the roadway connecting Phyllis Place to Franklin Ridge Road/Via Alta, and would remove language regarding the potential connection from the Mission Valley Community Plan. This alternative was rejected from further consideration because it would not meet any of the project objectives, as detailed within Section 9.4.1.2.

Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City's Climate Action Plan and Bicycle Master Plan include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended. No revisions to the FEIR are warranted as a result of this comment.

DD-9: This comment states that the proposed road connection does not serve the objectives and suggests that the street connection does not result in less congestion, improved circulation, improved emergency access, evacuation routes or improve pedestrian and bike access between communities. This comment does not specifically state why the commenter believes the project does not meet the project objectives; therefore, no specific response can be provided.

DD-10: This comment lists opinions on the project impacts and indicates opposition to the proposed project. Concerning the analysis within the DEIR, the commenter states that the project conflicts with several land use plans and would negatively impact roads, noise, and pollution.

The DEIR adequately analyzes the project's relationship with applicable land use plans (please see Section 5.1, *Land Use*, of the DEIR). As discussed in that section, the project would not conflict with the plans listed by the commenter. In addition, the Mission Valley Community Plan states that the roadway connection should be built in the future (as detailed in Chapter 3, *Project Description*). The DEIR identifies significant traffic impacts associated with roadway capacity and traffic hazards (please see Section 5.2, *Transportation and Circulation*). The DEIR (see Section 5.4, *Noise*) identifies a significant construction noise impact; however, mitigation set forth therein would reduce the impact to less than significant. Finally, the DEIR does not identify significant impacts related to air quality, as further detailed in Section 5.3, *Air Quality*. No revisions to the FEIR are warranted as a result of this comment.

DD-11: This comment states opposition to the project, that the project does not meet project objectives, and that the project has significant impacts related to traffic, noise, and pollution. Please see the response to comment DD-10.

It also states that the DEIR is not in compliance with CEQA, that alternatives are not comprehensive, and that information is contradictory in multiple locations, fundamentally inadequate, and conclusory. However, no specific examples are provided and as such, a specific response cannot be provided. Please see the responses to comments F-2, H-6, and CN-11. No changes to the FEIR are required in response to this comment.

DD-12: This comment recommends that the Mission Valley Community Plan be revised to exclude the Franklin Ridge Road Connection as it is not mitigable below a significant level and negatively impacts transportation/circulation, air quality, and noise (operational) in both communities. Please see the response to comment H-3. Section 9.4.1.2 of Chapter 9 of the DEIR explains in detail why the No Build/Remove from Mission Valley Community Plan Alternative is not a suitable alternative. In addition, please see the response to comment DD-10. In addition, the noise impact identified in the DEIR is associated with construction noise and would be mitigated to less than significant (refer to Section 5.4, *Noise*). The project would have a less than significant impact on operational noise. No revisions to the FEIR are warranted as a result of this comment.

DD-13: This comment states that the project does not meet the project objectives, then restates the first project objective. It also states that the project does not meet the objective because of a Mission Valley Community Plan (MVCP) policy referring to streets serving new development. Finally, the comment states that the project is “less compliant” with the City’s General Plan and Community plans than the No Project Alternative.

The proposed project was based on the project objectives that are detailed within Section 3.1 of the DEIR. Please see Chapter 3, *Project Description*, of the DEIR, for a list of the project objectives. Please see the responses to comments within Letter H related to the project not meeting project objectives.

As discussed in Section 5.1, *Land Use*, subsection 5.1.5, Impact Analysis, of the DEIR, the project would not conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plans or other applicable land use plans. Relevant goals and guidelines from the City of San Diego General Plan and the Serra Mesa Community Plan were compared against the compatibility of the proposed project and its objectives, as the proposed project entails an amendment to the Serra Mesa Community Plan. As stated in Section 3.2.1 of the DEIR: “Currently, there is a discrepancy between the Mission Valley Community Plan and Serra Mesa Community Plan regarding a roadway connection south from Phyllis Place. The Mission Valley Community Plan calls for a roadway connection; the Serra Mesa Community Plan does not include the connection on the roadway map” (included in its Transportation Element).”

The proposed project would generally implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan and the Serra Mesa Community Plan. Specifically, the proposed project is consistent with planning goals identified in the Mobility Element of the General Plan, as the roadway would balance the needs of multiple users of the public right-of-way by providing vehicle, bicycle, and pedestrian lanes/sidewalks. It is also consistent with the San Diego Association of Governments’ (SANDAG) Regional Transportation Plan and is included within long-term forecast models. Moreover, it would provide a linkage within and between communities (Mission Valley and Serra Mesa) and would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route. Therefore, impacts were determined to be less than significant.

Concerning the alleged inconsistency with the Mission Valley Community Plan, the City interprets the policy statement as referring to residential streets on the southern side of Mission Valley. Moreover, as evidence that the Mission Valley Community Plan anticipates a future road connection between Serra Mesa and Mission Valley, the following is stated from page 3-1 of the Project Description, which is an excerpt from the Mission Valley Community Plan:

“Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels.”

No changes to the FEIR are warranted as a result of this comment.

DD-14: This comment restates the second project objective and suggests that there are more significant intersection delays with the road than without and that this does not constitute improved local mobility within the Serra Mesa and Mission Valley planning areas. It also expresses the opinion that pedestrian-friendly community characteristics are undermined.

The proposed project would improve local mobility within the Serra Mesa and Mission Valley planning areas as it would provide a direct roadway connection from the southwestern portion of Serra Mesa to the Quarry Falls site for motorists, cyclists, and pedestrians. Section 5.2, *Transportation and Circulation*, of the DEIR, does identify significant impacts related to vehicle level of service (LOS) for several intersections and roadway segments in the Near- and Long-Term Scenarios; however, the proposed project would reduce Vehicle Miles Traveled (VMT) within the study area and region, which generally is a better indicator of improved access than LOS (i.e., shorter distances to reach destinations). In addition, based on the guidelines for analyzing intersections and roadways, the analysis would miss some of the intersections and roadways that would improve with the project because it only includes intersections and roadways where the project adds more than 50 trips. If the project reduces trips in more distant areas in Serra Mesa and Mission Valley, those facilities would not necessarily be included in the impact study area. Therefore, the proposed project would meet the objective stated by the commenter. For comments related to walkability and pedestrian safety, please see the response to comment F-4.

DD-15: This comment restates the results of the traffic impact analysis (Appendix C to the DEIR) and presents the commenter's opinion regarding the results. It also asks if the delay at Mission Center Road and Murray Ridge Road/Phyllis Place would be 171 minutes in the PM hour or 117 minutes.

No response is required for the commenter's opinion on the results of the traffic impact analysis. Concerning the delay at the intersection of Mission Center Road and Murray Ridge Road/Phyllis Place, it is assumed the commenter is asking for the results of the Long-Term Scenario without the project in the PM peak hour. As detailed within Table 5.2-17 of the DEIR, the delay at this intersection would be 171 minutes without the project, which would be LOS F. Please see Appendix C. No revisions to the FEIR are warranted as a result of this comment.

DD-16: This comment restates the third bulleted objective from the DEIR (see Section 3.1) and does not agree that the project meets the stated objective. The comment also excerpts Appendix C, although it is not known if the commenter is referencing the most recent version of Appendix C circulated with the DEIR. Please see the response to comment H-6. Section 5.2, *Transportation and Circulation*, of the DEIR, analyzes project conditions related to the freeway ramps. Within the Long-Term Scenario (Year 2035), a significant impact was identified at the I-805 SB on-ramp at Murray Ridge Road (Impact TRAF-18) and mitigation was identified that would reduce the impact to less than significant. The project would improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding area. For example, there is no direct route to the I-805 from the Civita site. This is demonstrated by the Vehicle Miles Traveled (VMT) analysis, included within Appendix H to the DEIR, which shows that VMT would be reduced by implementation of the proposed project. Since the proposed project does not generate any new trips and only provides drivers additional options where intersections or ramps get busier with the project, delays at other intersections and ramps in the Serra Mesa and Mission Valley communities would improve. Therefore, the project would meet this objective. No revisions to the FEIR are warranted as a result of this comment.

DD-17: This comment restates the fourth bulleted objective from the DEIR (see Section 3.1) and does not agree that the project meets the stated objective. Please see the response to comment H-8. In addition, please refer to Section 7.4 of the DEIR, which states that the proposed project would provide an additional ingress and egress roadway for the surrounding area, and provide additional emergency access for emergency responders to the area. It is acknowledged that Kaplan Drive currently provides emergency access, as clarified in the FEIR. However, it does not provide direct access from major roadways, such as I-805 or Murray Ridge Road, as the proposed roadway would. Please also refer to Sections 7.7.1 and 7.7.2 of the DEIR, which state that additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times for fire-rescue and police responders. Finally, please see Section 5.2, *Transportation and Circulation*, of the DEIR, which shows that driving time to and from hospitals and fire departments would improve with the project. Therefore, the project would meet this objective.

DD-18: This comment restates the fifth bulleted objective from the DEIR (see Section 3.1) and does not agree that the project meets the stated objective. The comment states that the DEIR does not support the conclusion for safe travel conditions, that cyclists would not be protected, that the proposed roadway would be too busy to be safe for pedestrians and cyclists, and references policies from community plans.

The DEIR adequately details the issues relating to pedestrian, cyclist, and alternative transportation users' safety. Please refer to Section 5.2.8 of the DEIR. The Class II bike lane is a dedicated bike lane that would provide connectivity from Phyllis Place southward to Civita and vice versa. The conceptual roadway design complies with the City's Street Design Manual (2002) and therefore the design would provide for the safety of all users. Concerning the policy from the Mission Valley Community Plan, the roadway has been conceptually designed to balance the safety of all users, including motorists, pedestrians, and cyclists, to the extent feasible. Therefore, the project would meet this objective. No revisions to the FEIR are warranted as a result of this comment.

DD-19: This comment excerpts portions of the DEIR related to mitigation measures. However, it does not raise any specific issue with the mitigation measures or regarding the adequacy of the DEIR.

DD-20: This comment states that the amount of cars along Franklin Ridge is consistent with a Major Arterial or Prime Arterial, not a collector street which Franklin Ridge Road is classified as. As detailed within Section 5.2.5 of the DEIR, a significant impact in the Long-Term Scenario would occur to the segment of Franklin Ridge Road from Via Alta to Civita Boulevard, as the ADT of 20,919 is more than the LOS E capacity of the roadway, which is 16,667. Mitigation was identified; however, it is not recommended to be implemented. No revisions to the FEIR are warranted as a result of this comment.

DD-21: This comment states that the class II bike lane included within the project does not protect cyclists from cars like the current plan with a vehicle-free bike path going through the park south of Phyllis Place connecting the two communities.

There is no planned vehicle-free bike path going through the park south of Phyllis Place as referenced by the commenter. There is a planned pedestrian trail (see Figure 3-5b). As detailed in the Quarry Falls Specific Plan: "The Finger Trails provide direct pedestrian access into the Quarry Falls Park from the adjacent residential neighborhoods, collecting from and connecting to the outermost areas of the Foothills and Terrace Districts. The Finger Trails are constructed on slopes

that intervene the various adjacent residential development areas and enter the Park in an east-west direction.”

Furthermore, a Class II bike lane (included within the project) does provide separation from the roadway.

DD-22: This comment states that the project would cause road delays of 40-96 minutes, increasing traffic on Franklin Ridge Road, and limiting mobility by not allowing the community to feel safe to walk, drive, or ride a bike.

The significant vehicle delay traffic impacts of the proposed project are detailed within Section 5.2, *Transportation and Circulation*, of the DEIR. Pedestrian circulation and linkages are detailed within the Quarry Falls Specific Plan. For example, the Specific Plan states: “Streetside sidewalks, separated from the streets by landscaped parkways, occur as pedestrian elements along Quarry Falls Boulevard, Community Lane, Russell Park Way, Via Alta and Franklin Ridge Road. Sidewalks should be provided along local streets and private drives in accordance with the City of San Diego Street Design Manual (November 2002).” Figure 4-14 from the Specific Plan shows the pedestrian circulation and linkages within Quarry Falls and has been included as a figure within the FEIR (see Figure 3-4b). As detailed in the response to comment F-4, pedestrians would be required to use designated crosswalks and comply with applicable City laws and regulations.

Although it is acknowledged that vehicle traffic along Via Alta and Franklin Ridge Road will increase as a result of the project, the roadways are designed to accommodate this amount of vehicle traffic. In the long-term scenario (Year 2035), the segment of Franklin Ridge Road from Via Alta to Civita Boulevard is projected to operate at an LOS F (see Table 5.2-16 of the DEIR). However, as detailed above, this would not result in an impact to pedestrian safety. Franklin Ridge Road has been designed with sidewalks separated from the streets by landscaped parkways and multiple crossings and linkages (see Figure 4-14 from the Specific Plan). Therefore, as adequately detailed in the DEIR, the proposed project would not result in an impact related to pedestrian safety. No revisions to the FEIR are warranted as a result of this comment.

DD-23: This comment states that the Serra Mesa Community Plan states that there is a need for separate pedestrian access to parts of the Mission Village Shopping Center and other activity centers. This comment does not specifically address the adequacy of the DEIR.

DD-24: This comment indicates that the Mission Valley Transportation Plan states that pedestrian comfort traveling along segments is highly influenced by right-of-way width, vehicular traffic volumes and speed, and adequate separation from vehicles. This comment does not specifically address the adequacy of the DEIR.

DD-25: This comment asks why an objective from the previous PEIR was removed, states that the General Plan and Bicycle Master Plan are already implemented, and that the proposed CPA (community plan amendment) conflicts with the General Plan and Bicycle Master Plan as they pertain to developing interconnectivity between communities, the proposed increase in traffic decreases safety for pedestrians and cyclists and does not increase connectivity as connectivity is already planned with a trail at connection location.

Please see the responses to comments DD-13, DD-21, and DD-22. Please refer to Section 5.1, *Land Use*, of the DEIR as to why the proposed project would not conflict with the General Plan and Bicycle Master Plan.

DD-26: This comment states that mitigations that are conditions of approval for the proposed project include the removal of bicycle lanes in Serra Mesa in direct contrast to the city's Bicycle Master Plan. Mitigation measures are not necessarily conditions of approval if they are rejected by the Lead Agency as infeasible.

As detailed in the Section 5.2, *Transportation and Circulation*, of the DEIR, it was assumed that this mitigation measure (MM-TRAF-1) would not be implemented, as it would remove the bicycle lanes. No revisions to the FEIR are warranted as a result of this comment.

DD-27: This comment is similar to comments F-2, DD-8, and DD-10. Please see the responses to those comments.

DD-28: This comment states that the chart provided summarizes major issues raised within the remainder of the letter. As each of these comments are detailed further in the letter, they are responded to accordingly herein.

DD-29: This comment is similar to comments F-2 and DD-26. Please see the responses to those comments.

DD-30: This comment states that the City did not conduct the environmental review without bias. The City Council Resolution directed staff to consider the benefits (if they were present) that would occur with a road connection. The DEIR and the environmental analysis were conducted by the City and its consulting team composed of environmental professionals, which does not have any stake or interest in the outcome of the proposed project other than to provide a thorough environmental analysis to be reviewed by the public and decision makers using the best available science. The commenter does not state within this comment what "pertinent facts" were omitted.

DD-31: This comment is similar to comment G-14; please see the response to that comment.

DD-32: This comment asks why changes were made to the project CEQA objectives that were included in the previous program EIR. Please see the response to comment K-11.

DD-33: This comment is similar to comments DD-26 and DD-32. Please see the responses to those comments.

DD-34: This comment asks if overall circulation network was removed because the traffic study did not encompass the entire Serra Mesa and Mission Valley planning areas. Please see the response to comment DD-32. In addition, the traffic impact analysis is not required to cover the entirety of these planning areas; the analysis is required only where 50 or more trips would be added as a result of the project (as discussed in detail within Section 5.2, *Transportation and Circulation*, of the DEIR).

DD-35: This comment states that the Mission Valley Community Plan states that the connection should be from Stadium Way. This statement is incorrect. As detailed in Section 3.2.1 of the DEIR: "Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states:

Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by

agreement between the City and the property owner at the time urban development takes place on these parcels.

DD-36: This comment is similar to comment G-16; please see the response to that comment.

DD-37: This comment asks if the City Council questions in the resolution were to be used what the conclusion of each alternative would be. As detailed in the response to comment G-16, the City Council Resolution listed questions it sought answers for, it did not mandate these be used as project objectives. There is no requirement under CEQA to evaluate other project objectives suggested by the commenter. These questions are adequately addressed within the DEIR. No changes to the FEIR are warranted as a result of this comment.

DD-38: This comment expresses the opinion that a significant impact on aesthetics should have been identified. Please see the response to comment G-170.

DD-39: This comment is similar to comment G-187; please see the response to that comment.

DD-40: This comment is similar to comment G-188; please see the response to that comment.

DD-41: This comment is similar to comment G-189; please see the response to that comment.

DD-42: This comment is similar to comment G-190; please see the response to that comment.

DD-43: This comment is similar to comment G-191; please see the response to that comment.

DD-44: This comment is similar to comment G-192; please see the response to that comment.

DD-45: This comment is similar to comment G-192; please see the response to that comment.

DD-46: This comment is similar to comment G-193; please see the response to that comment.

DD-47: This comment is similar to comment G-194; please see the response to that comment.

DD-48: This comment states that many of the issues alleged by the commenter in the No Build/Remove from Mission Valley Community Plan Alternative section apply to the No Project section. Please refer to the responses to comments G-187 through G-194. This comment also states that the analysis doesn't mention that there are inconsistencies in the Mission Valley Community Plan that would require community plan amendments. The proposed project would not require an amendment to the MVCP; the MVCP recommends including a roadway connection as previously detailed in the response to comment DD-35. The comment references two policies in the MVCP, one pertaining to the policy on page 56 of the MVCP. Please see the response to comment DD-35. The MVCP also has a policy pertaining to Franklin Ridge Road. That policy pertains to the Franklin Ridge Road within Civita, not the proposed roadway analyzed within the DEIR that would connect Phyllis Place to Franklin Ridge Road and Via Alta. No community plan amendment to the MVCP is required. No revisions to the FEIR are warranted as a result of this comment.

DD-49: This comment is similar to comments G-188 and G-189; please see the responses to those comments.

DD-50: This comment is similar to comment G-199; please see the response to that comment.

DD-51: This comment is similar to comment G-200; please see the response to that comment.

DD-52: This comment is similar to comment G-201; please see the response to that comment.

DD-53: This comment is similar to comments G-163 and G-164. Please see the responses to those comments.

DD-54: This comment is similar to previous comments detailed above. Please see the responses to comments G-187 through G-200.

DD-55: This comment is similar to comment DD-48. Please see the response to that comment.

DD-56: This comment states to refer to the Transportation/Circulation and Parking section of the comment letter that questions the validity of the Community Access data. It also asks that if this data is revised, if the conclusion would change within the analysis of Alternative 2.

No specific issue with the DEIR is raised in this comment, and the comment refers to another comment elsewhere in the comment letter. No specific response can be provided, and no changes to the FEIR are required in response to this comment.

DD-57: This comment is similar to comments G-16 and DD-37. Please see the responses to those comments.

DD-58: This comment is similar to comment G-205; please see the response to that comment.

DD-59: This comment is similar to comment G-206; please see the response to that comment.

DD-60: This comment is similar to comment G-208; please see the response to that comment.

DD-61: This comment is similar to comments G-205 and G-206. Please see the responses to those comments.

DD-62: This comment states that the following are quotes from the DEIR, the comments and questions directly relate to the DEIR, some quotes are from the previous PEIR and the questions still pertain to this recirculated document and still need to be addressed. The commenter is also requesting that all be addressed. Please see the responses below.

DD-63: This comment quotes an excerpt from the CEQA Guidelines and states that the alternatives are not reasonable and were not explored due to the main focus being amendment of the plan rather than what is better for both communities. It also asks to describe reasonable alternatives to the project, such as decrease development in Mission Valley. It also generally states that the underlying goal is hidden resulting in narrow focused objectives not allowing exploration of reasonable alternatives per CEQA.

This comment makes general allegations of not being in compliance with CEQA but does not provide a specific reason. The DEIR analyzes a reasonable range of alternatives to the proposed project, as fully detailed in Chapter 9, Alternatives, of the DEIR. The suggested alternative of decreasing development in Mission Valley would not meet any of the project objectives and is outside of the entire scope of the proposed project. The Mission Valley CPU is currently in process and will analyze numerous development scenarios. The City encourages residents and concerned individuals to provide input on development plans as part of the CPU process.

DD-64: This comment excerpts significant and unavoidable traffic impacts of the project and states that, by not being able to mitigate significant impacts, the proposed project is not superior. The comment also states that the reason to amend the plan is to improve traffic circulation and congestion which the DEIR proves not to be the case. It also asks why the project would continue when the objectives are not met.

This comment contains contradictory statements. CEQA requires an Environmentally Superior Alternative be identified; the DEIR complies with this requirement (see Section 9.5.3). The DEIR does not state that the project is “superior” to any of the alternatives. In addition, the Project Objectives (see Section 3.1) contain the underlying purpose of the proposed project, which is to improve local mobility and increase navigational efficiency to the freeways, which is reflected in the reduced VMT under the proposed project. The City does not agree that the objectives are not met; please see the multiple previous responses such as the responses to comments G-187 through G-193.

DD-65: This comment purportedly excerpts a portion of the DEIR; however, it is not known where this statement specifically exists as no reference or context is provided. The comment also states the project does not meet proposed goals and it also expresses an opinion as to how money should be spent on different roadway improvements.

The City disagrees that the proposed project does not meet the project objectives; please see the multiple previous responses such as the responses to comments G-187 through G-193. The remainder of the comment expresses an opinion but does not address the adequacy of the DEIR.

DD-66: This comment excerpts a portion of the DEIR regarding the VMT analysis and asks if waiting time affecting gas mileage and emissions is considered in VMTs. It also asks if neighborhood character and density is considered in VMTs. Finally, it asks if waiting in traffic is more environmentally friendly than driving slightly further.

VMT is generally defined as a measurement of miles traveled by vehicles within a specified region for a specified time period. As detailed in Section 5.10.4, if VMT is decreased by a project, the associated emissions will decrease: “Implementation of the proposed project would reduce VMT and associated emissions by providing a direct linkage that is consistent with the mobility goals of the City’s General Plan, relevant community plans, and the VMT and emissions reduction targets within the CAP.” It is not clear what the commenter is asking regarding neighborhood character or density being reflected in the VMT analysis. The VMT methodology is detailed within Appendix H to the DEIR, and reflects the Near-Term and Long-Term scenarios within the VMT influence area. Lastly, as detailed within the DEIR, a reduction in VMT in turn decreases emissions associated with vehicles. Therefore, it is appropriate to use as a metric in this type of project that redistributes trips (as further detailed in Section 5.2, *Transportation and Circulation*) rather than generates new trips. It is not entirely clear if the comment is asking if LOS (vehicle delay) is more “environmentally friendly” than VMT (driving distance); however, both metrics are utilized as appropriate within the DEIR. Moreover, it should be noted that much of the traffic generated in the project vicinity will be due to the buildout of Civita, which is immediately adjacent to the project. As such, the project will pull trips away from other busy roadways in Mission Valley as it is a zero sum effect.

DD-67: This comment excerpts a portion of the DEIR where significant impacts associated with LOS are detailed and asks why VMT is more important than these impacts.

The DEIR does not state that VMT is more important than LOS. These are two different metrics for analyzing traffic impacts. If the commenter is referring to alternatives, the analysis factors both of these metrics into the determination. Please refer to the detailed alternatives analysis within, for example, Section 9.5.1.2 of the DEIR. No revisions to the FEIR are warranted as a result of this comment.

DD-68: This comment excerpts a portion of the DEIR that discloses an impact to a freeway ramp and asks where the 43 minute delay that is mentioned in other place in the DEIR is and if it will be included within page 197 of the DEIR.

Regarding the 43-minute delay the commenter is referring to, please see the response to comment G-81. The 31 minutes of delay quoted by the commenter appears in Table 5.2-18 of the DEIR, and is consistent with the analysis provided in the Serra Mesa Community Plan Amendment Street Connection Technical Report by Chen Ryan Associates (Appendix C to the DEIR). No revisions to the FEIR are warranted as a result of this comment.

DD-69: The comment quotes two different portions of the DEIR and asks why VMTs are more important than the impacts associated with LOS.

Please see the response to comment DD-67. The DEIR adequately details why VMT impacts along freeway segments were determined to be less than significant (i.e., the decrease in VMT). The decrease in VMT along freeway segments has no bearing or relationship to the LOS impacts identified along roadway segments and intersections, and is not considered “more important.” Furthermore, the DEIR clearly explains the metric (e.g., VMT or LOS) that is being used within each section. No revisions to the FEIR are warranted as a result of this comment.

DD-70: This comment is similar to comments DD-67 and DD-69. Please see the responses to those comments.

DD-71: This comment states that the impact on the freeway ramps cannot be mitigated because it is not possible.

Section 5.2.5.2 of the DEIR identifies mitigation for Impact TRAF-18: I-805 SB on-ramp at Murray Ridge Road. MM-TRAF-18 states: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the applicant shall contribute a fair share contribution, in coordination with Caltrans, which would be applied toward an additional regular traffic ramp lane on the I-805 SB on-ramp from Murray Ridge Road. The commenter does not specifically state why the mitigation cannot be implemented.

DD-72: This comment quotes an excerpt from the DEIR, then goes on to state that the DEIR did not evaluate VMT directly and used old data. It also asks why VMT is a good measure to determine significance versus LOS.

Please see the responses to comments DD-67 and DD-69 for traffic-related VMT and LOS questions. The VMT data is not old as stated by the commenter; please refer to Appendix H to the DEIR. In addition, LOS is used within the portion quoted by the commenter within the Air Quality section of the DEIR to determine potential impacts related to carbon monoxide hotspots, as detailed therein. No revisions to the FEIR are warranted as a result of this comment.

DD-73: This comment quotes a policy from the General Plan and states that it contradicts the proposed project as Abbots Hill is a closed loop subdivision that would be affected by the location of the roadway.

The policy from the General Plan applies to new developments and encourages that they not be built to have a closed loop subdivision. Abbots Hill has existed for numerous years before the General Plan was adopted. In addition, this policy relates to the proposed project as it would not make Quarry Falls a closed-loop subdivision, as it currently exists. Finally, the City does not agree that the road location is dangerous. Although the DEIR identified a significant impact with relation to the

Church driveway, the City will coordinate with the applicant and the Church to ensure egress options of motorists from the Church are retained. No revisions to the FEIR are warranted as a result of this comment.

DD-74: This comment asks how VMTs fit with the CAP and how VMTs relate to emissions when waiting in traffic.

LOS only analyzes traffic at a certain point and does not take in to account where trips start and end. Emission factors are based on either fuel consumption or vehicles miles traveled, so it would not be possible to estimate GHG emissions from LOS alone. VMT captures where all trips originate and end in a geographic area, which allows the practitioner to estimate fuel consumption or VMT and apply the California Air Resources Board (CARB) emission factors. OPR, created by statute in 1970, is part of the Office of the Governor of California. OPR serves the Governor and his Cabinet as staff for long-range planning and research, and constitutes the comprehensive state planning agency. The OPR has also recommended this approach to implement SB 743's shift to evaluations of VMT under CEQA.

In addition, please refer to the detailed discussion within Section 5.10.4.2 of the DEIR. As detailed therein: "The proposed project would add a roadway connection to the physical roadway network that would affect future vehicle circulation on local roadways and freeways. As on-road vehicles would reroute future trips with the proposed roadway connection, the project would affect traffic volumes on surrounding roadways. The operational analysis evaluates how the change in traffic volumes as result of the proposed project would affect GHG emissions. Section 5.2, *Transportation and Circulation*, of the DEIR, and Appendix C provide additional detail on the traffic modeling analysis and indicate how various freeway and arterial segments would be affected as a result of the proposed project. Appendix H to the DEIR includes the modeling results performed by SANDAG in calculating the regional VMT effects of the project within the project vicinity. The average daily traffic was multiplied by the segment lengths to determine the VMT associated with each freeway and arterial segment affected by the proposed project. The changes in emission estimates are based on the VMT for the freeway and arterial segments as a result of the proposed project."

It further goes on to state: "As shown in Table 5.10-4, the project would reduce regional annual VMT by 14,490 relative to the 2017 Near-Term baseline condition and by 17,723 relative to the 2035 Long-Term baseline condition. As a result of this change in VMT, emissions would decrease relative to baseline conditions. This reduction in emissions would be due primarily to the reduction in VMT achieved by the more direct route offered by the proposed road connection, relative to other arterials in the vicinity. Because the project would reduce GHG emissions on the roadway network, the project is considered to have a net benefit to the region that would help the City achieve its designated reduction targets."

No revisions to the FEIR are warranted as a result of this comment.

DD-75: This comment is similar to comment DD-74; please see the response to that comment.

DD-76: This comment states that VMT does not correlate with freeway mainline segments and generally asks to explain why congestion is not used in relation to emissions.

Please see the response to comment DD-74 for the comment related to emissions.

The City disagrees that VMT does not correlate with freeway mainline segments. Please see multiple sections within Section 5.2, *Transportation and Circulation*, of the DEIR, that detail why VMT is appropriate for use within freeway mainline segments. For example, as detailed within Section

5.2.1.2: “The Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity. No new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition.” No revisions to the FEIR are warranted as a result of this comment.

DD-77: This comment is similar to comment DD-74; please see the response to that comment.

DD-78: This comment asks that since the No Project Alternative is identified as the Environmentally Superior Alternative if it will be the one that is selected.

The No Project Alternative is not identified as the environmentally superior alternative. Please see Section 9.5.3: “However, because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative. For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative.”

Concerning if the project would be approved, as detailed in Chapter 1, *Introduction*, of the DEIR: “An EIR is an informational document, the purpose of which is to inform members of the public and agency decision-makers of the significant environmental effects of a proposed project, identify feasible ways to reduce the significant effects of the proposed project, and describe a reasonable range of feasible alternatives to the project that would reduce one or more significant effects and still meet the proposed project’s objectives. In instances where significant impacts cannot be avoided or mitigated, the proposed project may nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts...The City Council, in its role as the decision-making body of the City, is responsible for certifying the FEIR and approving the Findings of Fact and Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines prior to project approval.” As such, the decision to approve or deny the project will be up to the decision-maker (i.e., City Council) and will be made in consideration of the Findings and the Statement of Overriding Considerations.

No revisions to the FEIR are warranted as a result of this comment.

DD-79: This comment states that a statement regarding the alternatives having greater impacts is not true and just because VMTs will not be reduced with alternatives does not mean that alternatives are not superior for other reasons as the alternatives meet most of the other objectives. The comment also states that the significant impacts of the proposed project are more detrimental to the environment than the alternatives.

Please see Sections 9.5.1.11 and 9.5.2.11 of the DEIR for the alternatives’ relationship to the project objectives. The No-Project Alternative would not meet any of the project objectives. The Bicycle, Pedestrian, and Emergency Access Only Alternative would fully meet Objective #4 while partially meeting Objectives #2 and #5.

The DEIR adequately discloses the significant impacts of the project. As detailed in the response to comment DD-78, the City Council will determine if the economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts of the project.

DD-80: This comment is similar to comment DD-2; please see the response to that comment.

DD-81: This comment is similar to comments DD-13 through DD-18 and G-187 through G-191. Please see the responses to those comments.

DD-82: This comment generally repeats similar comments and statements made by the commenter throughout this letter and represents the opinion of the commenter on how money should be spent on improving on-ramps to surrounding freeways. The proposed project is intended to improve access between Serra Mesa and Mission Valley, specifically within the vicinity of Phyllis Place and Friars Road, respectively. In addition, freeway on-ramps are under the jurisdiction of Caltrans, not the City of San Diego. This comment represents the opinion of the commenter and does not address the adequacy of the DEIR.

DD-83: This comment states that there is an unnamed road on the east side of the I-805 off Friars Road that could be expanded or paralleled as it is very close to the 805 with no residences nearby and asks if this area could be an alternative to the project and asks why it was not studied.

The referenced roadway is a private driveway that leads to a San Diego Gas and Electric facility. It is not a public roadway and is not accessible by the public, which is why it is not named. As the roadway is a private road maintained by a private organization, it would not be feasible to utilize the roadway. No revisions to the FEIR are warranted as a result of this comment.

DD-84: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-85: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-86: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-87: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-88: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-89: This comment is similar to comments G-187 through G-191, DD-64, DD-66 through DD-71, DD-74, DD-76, DD-78, and DD-79. Please see the responses to those comments.

DD-90: This comment states that the two alternatives fully analyzed can meet one policy from the Mobility Element of the General Plan.

The DEIR does not (and is not required per CEQA) to analyze if each alternative complies with every goal and policy from the General Plan. It is required to compare the impacts of the alternatives to the project under each environmental issue, which the DEIR adequately does (see Chapter 9, Alternatives). It is acknowledged that the alternatives would likely meet this one specific policy; however, this does not change the results of the alternatives analysis. Specifically, the conclusion remains that both the No Project Alternative and the Bicycle, Pedestrian, and Emergency Access

Only Alternative would result in greater impacts on land use compared to the proposed project (see Table 9-2) as they would not be consistent with the City's CAP. No revisions to the FEIR are warranted as a result of this comment.

DD-91: This comment is similar to comments G-189, DD-64, DD-66 through DD-71, DD-74, DD-76, DD-78, and DD-79. Please see the responses to those comments.

DD-92: This comment is similar to comments DD-13 through DD-18 and G-187 through G-191. Please see the responses to those comments.

DD-93: This comment is similar to comments DD-13, DD-21, and DD-22. Please see the responses to those comments.

DD-94: This comment asks where it is discussed that the deviations from the General Plan and Master Bike Plan are justified and acceptable as required by CEQA. It also states that if the mitigations are not recommended, how it is acceptable and justified to continue with a project that is not recommended.

The proposed project does not require any deviations from the General Plan, Bicycle Master Plan, or any other development regulations as discussed in detail within Section 5.1, *Land Use*, of the DEIR. Some mitigation measures within Section 5.2, *Transportation and Circulation*, of the DEIR, as clearly noted throughout that section, were assumed not to be implemented as they would require the removal of bike lanes or on-street parking, which would in turn be in conflict with the General Plan. No revisions to the FEIR are warranted as a result of this comment.

DD-95: This comment states that traffic is less impacted with the No Project Alternative, that emergency access will be slowed with increased traffic, and it will not be safe for pedestrians and cyclists with increased road traffic in Civita or Serra Mesa.

Please see previous responses regarding comments on the No Project Alternative (G-187 through G-191, DD-64, DD-66 through DD-71, DD-74, DD-76, DD-78, and DD-79).

Regarding emergency access, vehicles are required to pull to the right side of the road when an emergency vehicle approaches. This comment is general in nature and does not specifically point to a location in the detailed traffic study prepared.

Regarding pedestrian safety, please see the response to comment G-68.

DD-96: This comment is similar to comments G-187 through G-191, DD-64, DD-66 through DD-71, DD-74, DD-76, DD-78, and DD-79. Please see the responses to those comments.

DD-97: This comment quotes an excerpt from the DEIR and generally states that the analysis is "false" and it is the commenter's opinion that the project will result in growth inducement. It also states that the roadway would make the existing neighborhood within Serra Mesa west of the project site inaccessible for the residents that live there.

The DEIR adequately analyzes the potential for both direct and indirect growth inducement. Section 8.3.1 of the DEIR analyzes direct population growth and states that "no new residential units or other structures that would generate population would result from implementing the proposed project. Therefore, the proposed project would not directly result in population growth."

Concerning indirect growth-inducing effects related to substantially altering planned growth, as detailed in Section 8.3.2 of the DEIR: "...the proposed project would result in redistribution of area

traffic patterns; however, no new traffic would be generated as a result of the project. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans. The proposed project would not be expected to alter the density or growth rate of the adjacent Quarry Falls development because this project has an approved specific plan that specifies the residential densities within the site. Therefore, the proposed project would not substantially alter the planned location, distribution, density, or growth rate of the population of an area.”

Concerning the indirect growth-inducing effects related to the extension of infrastructure, as detailed in Section 8.3.2 of the DEIR: “...the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The proposed roadway would accommodate existing and planned near-term growth within the vicinity of the project site. Furthermore, it would provide additional options for motorists, pedestrians, and cyclists to travel north and south between the Serra Mesa and Mission Valley communities. Because the site is located within a community that is in the process of being nearly built out, all major public services and utilities currently service the project site. The proposed project would require storm drains or related stormwater management features; however, these would be sized to treat only the stormwater associated with the project. It would not provide surrounding development with stormwater treatment. Furthermore, no new infrastructure facilities for water supply or wastewater treatment would be required to accommodate the project. The proposed project would not result in the extension of major infrastructure facilities into areas that would induce population growth or reduce barriers to additional growth.”

Therefore, the proposed project is not anticipated to result in allowing another probable or future project to have greater density or greater growth than if the proposed project were not to be implemented. The proposed project is generally intended to accommodate the traffic capacity within the vicinity of the project site, not to encourage additional development. As detailed in the response to comment BQ-18, reasonably foreseeable projects were analyzed within the context of the potential for cumulative impacts. These projects are not within the immediate vicinity of the project site, except for Quarry Falls. However, the Quarry Falls project has a development limit that has to be adhered to and would not be affected by the proposed project. Other projects that are not in the immediate vicinity would not “benefit” significantly from the roadway connection in that it would not “open up” a new area for development, nor would it allow projects to accommodate a higher density, as detailed above in the discussion regarding indirect growth inducing effects.

Concerning the comments related to why a roadway would make the existing neighborhood within Serra Mesa west of the project site inaccessible for the residents that live there, the City does not agree with these comments. The inclusion of a roadway would increase access options for those in the Abbots Hill neighborhood, including Mission Valley, where they would (currently by vehicle) have to take a circuitous route to access (i.e., Phyllis Place to Murray Ridge to Mission Center Road), which increases VMT and use of finite resources (e.g., fossil fuels). Although the traffic analysis (see DEIR Section 5.2.5) does show that roadway volumes increase in the long-term analysis due to cumulative growth factors, the intersection at Phyllis Place and Franklin Ridge Road would operate at LOS A and B in the AM and PM peak hour, respectively (see Table 5.2-17). Traffic conditions within the vicinity of the project site would not be as described by the commenter, where vehicles, pedestrians, or cyclists using Phyllis Place to travel westward in the Abbots Hill neighborhood would not be able to access it.

For comments related to community character, please see the response to comment G-170.

No revisions to the FEIR are warranted as a result of this comment.

DD-98: This comment generally states that impacts to nearby residents of the project site would be significant, that the community would not be able to voice opposition, that traffic would be slowed to 43 minutes, and that evacuation would be impaired.

The DEIR adequately discloses all significant and unavoidable impacts of the proposed project. Based on the analysis presented in Chapter 5 of the DEIR, the project would result in significant and unavoidable direct impacts after mitigation related to the topic area of transportation and circulation (roadway network capacity, planned transportation systems, and traffic hazards).

Regarding public input, the public noticing associated with the proposed project has complied with all applicable requirements of CEQA.

Regarding the 43-minute delay the commenter is referring to, please see the response to comment G-81. As detailed in Section 7.4, *Health and Safety*, of the DEIR, the proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan, and would increase emergency access opportunities in the vicinity; no impact would occur.

Furthermore, it would provide an additional point of egress for those within the Quarry Falls site if an emergency evacuation were to occur. Under the existing condition, if an emergency were to occur, all residents or those using the commercial facilities within Quarry Falls would be required to exit toward the west to Mission Center Road or the south via Friars Road. An additional egress point (such as the proposed roadway) would generally improve emergency evacuation route options for the Quarry Falls site as an additional option would be provided to the north. No revisions to the FEIR are warranted as a result of this comment.

DD-99: This comment quotes an excerpt from the DEIR and then states that there are multiple inadequacies with the DEIR, all of which have been previously raised in the comment letter to this point. These statements have been previously addressed within multiple responses above. Please refer to all previous responses to comments.

The commenter also states that cars will be driving by residences every 3 seconds. This is not correct. Average Daily Traffic (ADT) is the average amount of vehicles that are predicted to use a roadway; however, the ADT is not evenly distributed throughout a 24-hour period. Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR and Appendix C to the DEIR for further information.

DD-100: This comment generally asks if the Phyllis Place Park will be useable if the roadway will bisect it and if it was considered within the DEIR.

This comment is similar to comments K-27 and BQ-8. Please see the responses to those comments.

DD-101: This comment quotes an excerpt from the DEIR regarding general plans and states that the proposed project should be updated, and also states that traffic from industrial areas should not travel through residential areas.

The meaning and intent of the comment is unclear, and it is not clear what this comment is referring to in whole. The quoted excerpt from the DEIR (see Section 5.1, *Land Use*) pertains to a regulation within state law that requires cities to update their general plan periodically. The City's General Plan was updated and adopted in 2008. The proposed project is not a general plan, it is a proposed

roadway connection and includes an amendment to the Serra Mesa Community Plan, which is being proposed to meet the project objectives. It is not clear what the commenter is stating with regards to traffic from industrial areas and residential areas.

DD-102: This comment is similar to comment DD-98. Please see the response to that comment.

DD-103: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-104: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-105: This comment is similar to comments DD-48, G-163, G-164, G-187 through G-194, and G-199 through G-201. Please see the responses to those comments.

DD-106: This comment asks if the project fits with the current zoning and if traffic belongs in a single-family use zone.

Please see Section 5.1.4.1 of the DEIR. The proposed project does not conflict with land use or zoning. The proposed project entails the construction and operation of a roadway and an amendment to the Serra Mesa Community Plan to include the roadway connection. As such, the proposed project would be classified as public right-of-way and would not conflict with existing land uses because public right-of-way is needed to access parcels no matter which land use designation they may be located in and is considered an essential public facility rather than a land use.

Indirect impacts of the roadway would potentially result from the vehicles on the roadway and the associated noise or pollutants that have the potential to affect sensitive receivers, such as nearby residents or those using the park or the church on the north side of Phyllis Place near the project site. The potential indirect impacts of the project, including air quality and noise, are analyzed throughout the DEIR (see Sections 5.3, *Air Quality*, and 5.4, *Noise*). As demonstrated in those sections, the proposed project would not conflict with planned land uses, including the parks to be located adjacent to the roadway within the Quarry Falls site.

DD-107: This comment excerpts the phrase “Regional Air Quality Plan” and states that the proposed project “does not fit current quality but would with alternatives to the project.”

It is not clear what this comment is referring to or the point attempting to be made by the commenter. As detailed in Section 5.3.4 of the DEIR: “The proposed project would be consistent with the local general plan and SANDAG’s growth projections. As such, the proposed project would be consistent with the underlying growth forecasts in the RAQS. Impacts would be less than significant.”

DD-108: This comment expresses unsubstantiated conclusions regarding project impacts and expresses the commenter’s opinion on the utility of the project.

The statements raised by the commenter have been previously addressed within multiple responses above and completely by the DEIR. Please refer to all previous responses to comments and the DEIR for a description of all of the project impacts, along with the required mitigation should the project be implemented.

DD-109: This comment is similar to comment DD-90. Please see the response to that comment.

DD-110: This comment sets forth numerous unsubstantiated conclusions regarding project impacts and provides an opinion on the project, but does not raise a specific issue concerning the adequacy of the DEIR. As stated within the excerpt quoted by the commenter, the project has been conceptually designed to be consistent with the City's Street Design Manual.

DD-111: This comment provides an excerpt of the DEIR then sets forth numerous statements regarding purported project impacts and provides an opinion on the project, but does not raise a specific issue concerning the adequacy of the DEIR. This comment raises concerns similar to those provided in previous comments that have already been addressed.

DD-112: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-113: This comment sets forth numerous statements regarding purported project impacts and provides an opinion on the project, but does not raise a specific issue concerning the adequacy of the DEIR. This comment raises concerns similar to those provided in previous comments that have already been addressed.

DD-114: This comment asks numerous questions related to funding of the roadway, mitigation measures, and how money would be spent if the project were not to be implemented.

As detailed in Chapter 3, *Project Description*, of the DEIR, the City is not proposing to construct or fund the roadway connection but only to analyze the environmental effects of its construction and operation, as directed by the City Council. It is anticipated that the Quarry Falls developer would implement the proposed project; however, the proposed project could be implemented by another entity. Therefore, it is anticipated that if the project were to be approved, the Quarry Falls developer would implement and fund the project and mitigation measures. The other questions regarding funding are not related to the DEIR or the proposed project.

DD-115: This comment requests information generally concerning the implementation of the project.

Please refer to Section 3.2.2 of the DEIR for this information. As detailed therein, a Site Development Permit would not be required if the project were to be implemented by the Quarry Falls developer. No statement is made within the DEIR that there is no forthcoming specific proposal to build the road.

DD-116: This comment is similar to comments G-187 through G-191. Please see the responses to those comments.

DD-117: This comment generally states that the roadway does not fit in with the character of the community.

It is not clear what this comment is specifically referring to. While low-density residential would be served by the project, the roadway is not located within a low-density residential area. Please see Section 5.1, *Land Use*, of the DEIR. As this comment is not specific or clear as to what the commenter is stating, no further specific response can be provided. Section 5.1, *Land Use*, of the DEIR determined impacts to be less than significant, and no revisions to these conclusions are necessary.

DD-118: This comment asks if the proposed roadway is on a map within the General Plan and also states the opinion of the commenter. The comment also provides the commenter's opinion on the project, similar to previous comments.

The Mobility Element within the General Plan does not have any map with existing or planned roadways.

DD-119: This comment asks why quality of life as it pertains to the General Plan was not discussed.

Quality of life is not an environmental issue under CEQA. As detailed further within the CEQA Statute and Guidelines, the fundamental purpose of CEQA is to disclose to the public and decision makers the significant physical impacts on the environment by a proposed project. The DEIR complies with this fundamental purpose.

DD-120: This comment excerpts a portion of the Mobility Element and states an opinion regarding the proposed roadway. It also asks why introductory language in the Mobility Element was not included within the DEIR.

The DEIR (see Table 5.1-1) includes an analysis of the project's compatibility with the General Plan, including numerous relevant policies from the Mobility Element. The quoted excerpt is not a policy of the Mobility Element. The proposed project was found to be generally consistent with the General Plan, as further detailed in Section 5.1, *Land Use*, of the DEIR.

DD-121: This comment provides an excerpt from the previously circulated PEIR and asks for clarification. It also asks if the current Bicycle Master Plan or possibly the Park Trail plan is included in the DEIR in order to be in compliance with CEQA.

The previously circulated PEIR was not correct; the Class II bike lane along the roadway is included within the Bicycle Master Plan. It is not clear what "current plan" the commenter is referring to. If the commenter is referring to the Park Trail that would provide bike and pedestrian access, this fact is noted within Chapter 3, *Project Description*, of the DEIR. If it is the Bicycle Master Plan, the consistency analysis is provided in Section 5.2, *Transportation and Circulation*, of the DEIR.

DD-122: The comment asks why the project was not included within the Quarry Falls Specific Plan.

Please see Section 3.2.2 of the DEIR which details the project background. As previously detailed, no amendment to the Quarry Falls Specific Plan would be required as it was designed to both accommodate the roadway connection and to not include it.

DD-123: This comment generally asks if the project will be removed from the Mission Valley CPU and is similar to previous comments within this letter to which responses have been provided. This comment does not address the adequacy of the DEIR.

DD-124: This comment generally states that the project conflicts with the community plan and suggests it would be industrial and high-density.

The proposed project is a roadway and is neither an industrial or high-density land use. Please see Section 5.1, *Land Use*, of the DEIR for details as to why the project would not conflict with the Serra Mesa Community Plan.

DD-125: This comment is similar to comments G-170 and G-187 through G-191. Please see the responses to those comments.

DD-126: This comment suggests the No Project Alternative meets the General Plan goals with less environmental impacts than the proposed project. The comment states the No Project Alternative would integrate better with the General Plan.

This comment is similar to comment DD-13. Please see the response to that comment.

DD-127: This comment provides quoted text from the EIR stating the proposed project would comply with the existing jurisdictional plans, but then states the project would not comply with the Serra Mesa Community Plan because it is not included in the plan and it would not improve transportation or uphold safety on roads in Serra Mesa.

Please see the responses to comments DD-12 and DD-13 and Section 5.1, *Land Use*, of the DEIR. Specifically, the proposed project is consistent with the planning goals identified in the Mobility Element of the General Plan, as the roadway would balance the needs of multiple users of the public right-of-way by providing vehicle, bicycle, and pedestrian lanes/sidewalks. Additionally, the proposed project is itself an amendment to the Serra Mesa Community Plan to resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa. Therefore, the proposed community plan amendment is not within the Serra Mesa Community Plan because the community plan amendment is itself a component of the proposed project. The proposed roadway connection would provide additional access routes into and out of the Serra Mesa community, in particular the 200 homes located west of the proposed Franklin Ridge Road and Phyllis Place intersection. Furthermore, no vehicle trips would be redistributed onto Phyllis Place west of the proposed Franklin Ridge Road and Phyllis Place intersection; therefore, no new potential safety hazards from increased traffic would be presented onto this roadway segment. No changes to the FEIR are warranted as a result of this comment.

DD-128: The commenter mentions the future delay associated with buildout of the community plans under the project conditions and suggests that the project would divide the Serra Mesa and Mission Valley communities.

Serra Mesa and Mission Valley are currently somewhat divided in the vicinity of the project site due to intervening topography and steep slopes. As such, the street connection between the two adjacent communities would not divide an existing community but would help link them; thus, the proposed project would help achieve the General Plan goal of providing an interconnected street system that provides multiple linkages within and between communities. In addition, please see the responses to comments F-4 and F-5 regarding pedestrian/bicyclist safety and circulation within Civita.

DD-129: The commenter indicates that the comments that follow are comparisons of the Serra Mesa Community Plan, Mission Valley Community Plan, and City's General Plan and expresses the opinion that the analysis shows significant contradictions between the proposed project and these plans. This comment is an introductory statement indicating that additional comments are to follow, but does not identify any specific contradictions. No specific issues regarding the adequacy of the DEIR are raised.

DD-130: This comment provides a goal from the Serra Mesa Community Plan to "develop pedestrian and bicycle linkages connecting open space, neighborhood and community parks, schools and shopping facilities" and suggests this is already met by the No Project Alternative.

This comment disregards a fundamental objective of the proposed project, which is to resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.

This objective would be accomplished through a CPA to the Serra Mesa Community Plan, as proposed in the DEIR. Please see the responses to comments H-8 and G-18. It is acknowledged that

Kaplan Drive currently provides emergency access and bicycle and pedestrian access, as clarified in the FEIR (Section 5.2). However, it does not provide direct access from major roadways, such as I-805 or Murray Ridge Road, as the proposed roadway would. The addition of this clarifying information does not affect the conclusions reached within the DEIR. The proposed project would be considered a new access point as the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection and would not serve as an evacuation route for residents without access provided first by the City.

DD-131: This comment quotes a goal from the Serra Mesa Community Plan about Collector Streets and asks why it is not included in the DEIR that the project contradicts the Serra Mesa Community Plan.

The commenter does not provide any supporting evidence to support the opinion that Collector Streets are not just a means of ingress or egress out of a community for faster freeway access, nor does the commenter specify which ways the proposed CPA contradicts the Serra Mesa Community Plan. Therefore, no specific response can be provided.

DD-132: This provides an excerpt from the Serra Mesa Community Plan about Local Streets providing access to abutting property, serving adjacent land uses, and that they may be two-lane minor streets or one-lane alleys.

Please see the response to comment G-4. The proposed roadway would in turn require other roadways to be widened, such as Phyllis Place. However, Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan and the widening would be consistent with the Community Plan. No changes to the FEIR are warranted as a result of this comment.

DD-133: This comment quotes the Serra Mesa Community Plan regarding primary arterial-major street network in the community and indicates that Friars Road and Aero Drive function smoothly most of the time because there are few intersecting streets and virtually no driveways. This comment says this would not be the case for Franklin Ridge Road because it is a dense residential area. This comment asks if this will be considered in making the determination about traffic congestion.

As depicted in Figures 3-2 and 3-3 in Chapter 3, Project Description, of the DEIR, no intersections are located along Franklin Ridge Road other than the intersections of Franklin Ridge Road and Civita Boulevard and Franklin Ridge Road and Via Alta. Both the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates were prepared in accordance with the SANTEC/ITE Guidelines for Preparing Traffic Impact Studies and the City of San Diego Traffic Impact Study Manual. All potential transportation and circulation impacts of the proposed project are analyzed and disclosed in Section 5.2, *Transportation and Circulation*, of the DEIR, which are based on the results of the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates.

DD-134: This comment quotes the Transit Element of the Serra Mesa Community Plan regarding the public transit system. The comment suggests that improving the transit system should be considered an alternative.

The objectives of the proposed project are fully outlined in Chapter 3, *Project Description*, of the DEIR. As detailed in Chapter 3, the objectives of the project include resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts. Increasing mass transit would not meet a majority of the project objectives, and therefore was not considered as a project alternative. However, the proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. No changes to the FEIR are warranted as a result of this comment.

DD-135: This comment asks why trails are not considered as part of the circulation system in coming to a conclusion on the superior alternative. The comment asks if a trail rather than a road would be a safer route for children to travel within the community.

It is acknowledged that trails are part of the circulation system. However, a trail would not meet the objectives of the proposed project. The proposed project would include a street connection. The future implementation of the proposed project would close the gaps in the sidewalk network connecting the communities of Serra Mesa and Mission Valley. This street connection, including pedestrian facilities, would be linked to the Quarry Falls site. Please see the response to comment DD-134 for the project objectives. Please also see the response to comment F-4 regarding pedestrian safety related to the proposed future school.

DD-136: This comment expresses the opinion that the project would not provide safe and separate pedestrian access.

Please see the responses to comment F-4 and F-5 regarding pedestrian safety and circulation, and the proposed roadway connection's inclusion of sidewalks and Class II bicycle facilities.

DD-137: The commenter expresses the opinion that the most minimal effects would be from the No Project Alternative. The No Project Alternative was analyzed in Chapter 9, Alternatives, of the DEIR, including any potential environmental impacts of this alternative. As detailed in Chapter 9, the No Project Alternative would not meet any of the project objectives. In addition, the proposed project would include sidewalks and Class II bicycle facilities, and would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations.

DD-138: The commenter provides other means of improving circulation as outlined in the Serra Mesa Community Plan. However, these improvements do not meet the project objectives and are outside of the traffic study area for the proposed project.

DD-139: This comment expresses the opinion that the proposed project would not allow the open space vision as stated in the community plan.

Please see the response to comment G-168. The proposed roadway is a ground-level feature, and its implementation would not obstruct views that may be available from this proposed park or from

any other park or open space areas in the vicinity of the project site. No vertical building structures would result from implementation of the proposed project that would block views from Phyllis Place or otherwise obstruct views of motorists, pedestrians, or bicyclists from roads in the area. Therefore, no scenic views would be blocked or affected, and implementation of the proposed project would not block or otherwise affect any designated scenic vistas.

DD-140: This comment suggests that the additional access provided by the project would be redundant because the 805 already provides access and the project would only increase traffic.

The proposed roadway connection would improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. No new trips would be added by the proposed roadway connection. Rather, vehicle trips would be redistributed onto other existing regional circulation infrastructure. These trips would be generated as buildout of the Mission Valley and Serra Mesa community plans occur, regardless of whether the project is implemented. As such, the proposed roadway connection would not be adding new vehicle trips to I-805, but instead would be providing commuters that would otherwise be utilizing I-805 with additional options for accessing this freeway, which would lead to a reduction in vehicle miles traveled.

DD-141: This comment questions why increasing or improving transit were not considered as an alternative. Please see the responses to comments DD-134 and DD-140. No new trips would be added by the proposed roadway connection. Rather, vehicle trips would be redistributed onto other existing regional circulation infrastructure. These trips would be generated as buildout of the Mission Valley and Serra Mesa Community Plans occurs, regardless of whether the project is implemented. The proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. No changes to the FEIR are warranted as a result of this comment.

DD-142: This comment suggests fixing the transit network gap that exists near the I-805 corridor, as identified in the Mission Valley Community Plan, but does not provide any specific recommendations. The comment does not specifically raise issue regarding the adequacy of the DEIR.

DD-143: This comment is similar to comment H-7. Please see the response to that comment.

DD-144: The comment suggests pedestrian and bike-only paths would ensure more safety and asks if the trail through the park south of Phyllis Place would be safer for pedestrians than the road connection.

Please see the response to comment F-4 regarding pedestrian safety and circulation. The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the Street Design Manual. Additionally, there is a planned pedestrian trail (see Figure 3-5b). As detailed in the Quarry Falls Specific Plan: "The Finger Trails provide direct pedestrian access into the Quarry Falls Park from the adjacent residential neighborhoods, collecting from and connecting to the outermost areas of the Foothills and Terrace Districts. The Finger Trails are constructed on slopes that intervene the various adjacent residential development areas and enter the Park in an east-west direction."

DD-145: The comment asks why bicycle safety and comfort were not considered when analyzing the Mission Valley Community Plan and asks for an analysis of the proposed project versus the

pedestrians and bicyclists in the existing conditions, including Kaplan Drive and the trail at Phyllis Place.

Please see responses to comments F-4, F-5, and D-144 regarding pedestrian and bicycle circulation related to the proposed roadway connection. These topics were discussed and analyzed in Section 5.1, *Land Use*, and 5.2, *Transportation and Circulation*, of the DEIR. It is unclear what the commenter is referring to when requesting to analyze impacts of the proposed CPA versus pedestrians and bicyclists; impacts on pedestrian and bicycle facilities and safety were analyzed in the DEIR.

DD-146: The comment includes a quote from the Mission Valley Community Plan about bicycle level of traffic stress and suggests that the No Project Alternative would be consistent with the quoted text whereas the proposed project would not.

The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the Street Design Manual. Specifically, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. Additionally, the proposed project would merely redistribute vehicle trips that would be generated by buildout of the Serra Mesa and Mission Valley communities onto other existing transportation infrastructure. While some transportation facilities would see an increase in ADT, others would experience a net decrease compared to near-term and long-term traffic conditions without the proposed project. This redistribution would create a more balanced and efficient transportation network. The commenter's request to include and analyze an alternative excluding the proposed roadway connection from the Mission Valley Community Plan has already been addressed. Please see the response to comment CN-19. No changes to the FEIR are warranted as a result of this comment.

DD-147: This comment suggests that the project does not relieve vehicle congestion as stated as a goal in the General Plan and suggests that improving the transit system would relieve traffic congestion.

The proposed project's consistency with the specific General Plan goals identified by the commenter are analyzed in Table 5.1-1 of Section 5.1, *Land Use*, of the DEIR. As detailed in Table 5.1-1, the proposed project, if constructed, would provide a balance within the street system for the geographic area, as future implementation would include a sidewalk and bicycle facilities within the public right-of-way. Additionally, the proposed project would resolve a conflict between two community plans and include a street connection that would provide a linkage between the communities. Furthermore, the proposed project, if implemented, would provide more direct access to regional freeways and businesses, which would generally alleviate traffic congestion on neighborhood streets, but would see a rise in delay at certain areas near freeway ramps. Overall, the project would improve community access in the Serra Mesa and Mission Valley communities. Specific areas of vehicle congestion relief are discussed in the traffic report (see Appendix C) and Section 5.2, *Transportation and Circulation*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

DD-148: This comment suggests the proposed project does not allow safe and efficient street design and does not minimize environmental impacts.

The potential environmental impacts of the proposed project are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts associated with the proposed project. The comment does not specify which environmental impacts on the Serra Mesa neighborhood would *not* be minimized with the proposed

roadway connection; therefore, no specific response can be provided. However, the proposed project would implement several mitigation measures to reduce and minimize potential significant impacts to the maximum extent practicable. No changes to the FEIR are warranted as a result of this comment.

DD-149: This comment suggests that if the proposed project was approved it would encourage automobile traffic instead of transit, pedestrian or bicycle travel. This comment does not specify how the proposed roadway connection would encourage automobile traffic and would not support transit, bicycle, or “foot” alternatives. No new vehicle trips would be added by the proposed roadway connection. Rather, vehicle trips would be redistributed onto other existing regional circulation infrastructure. These trips would be generated as buildout of the Mission Valley and Serra Mesa Community Plans occurs, regardless of whether the project is implemented. As such, the proposed project does not encourage automobile traffic, but instead would accommodate vehicle trips associated with regional growth. Additionally, the proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City’s Bicycle Master Plan. No changes to the FEIR are warranted as a result of this comment.

DD-150: This comment expresses the opinion that the desired community character would not be achieved by the proposed roadway connection, as shown by the Serra Mesa Planning Group’s unanimous votes against the roadway connection in 2016 and 2017.

The City of San Diego is the jurisdiction with land use authority over the project area. Community plans are developed and implemented by the City, in collaboration with stakeholders and members of the public, and are components of the General Plan. They are approved by the San Diego City Council. As the proposed project consists of an amendment to the Serra Mesa Community Plan, the City is exercising its legal responsibility and proper land use authority. No changes to the FEIR are warranted as a result of this comment.

DD-151: This comment asks how public opinion will be considered in the approval of the FEIR.

Please see the response to comment F-2. This comment expresses opposition to the proposed project but does not specifically raise issue regarding the adequacy of the DEIR. All comments received as a part of the DEIR public review process become part of the administrative record and will be considered by the City during the decision-making process. In addition, three public hearings for the project will provide additional opportunities for the public to comment on the proposed roadway connection.

DD-152: The commenter suggests collector roads are specifically designed for routes to schools, parks, and village centers, and not for access to freeways.

The proposed project would connect Via Alta and Franklin Ridge Road (two-lane Major arterials) with Phyllis Place, a roadway that is designated in the Serra Mesa Community Plan as a four-lane Major arterial. The project would not directly link into any designated Collector roads. The project provides an additional connection between the Serra Mesa and Mission Valley communities that provides additional navigational options for drivers, cyclists, and pedestrians. This connection would help to create additional vehicle access to surrounding schools and parks between these two communities. Please see the response to comment W-1 regarding traffic calming measures. No changes to the FEIR are warranted as a result of this comment.

DD-153: This comment suggests the proposed project would form a barrier to pedestrian traffic and community cohesiveness with increasing traffic congestion, noise, and air pollution, and suggests the general plan supports this statement.

The environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, and 5.4, *Noise*, of the DEIR. With the implementation of mitigation measures to address construction noise levels, the proposed project would result in less than significant impacts related to noise during project construction. No mitigation or noise abatement measures are required to address potential traffic-related/operational noise as no significant impacts were identified in the DEIR. Potential impacts were determined to be less than significant related to air quality. Please see the responses to comments F-4 and F-5 regarding pedestrian safety and circulation. No changes to the FEIR are warranted as a result of this comment.

DD-154: This comment asks that if Phyllis Place, Via Alta and Franklin Ridge Road will reach LOS F, how is this not a significant impact to the neighborhood character, safety and traffic and in conflict with all plans.

All of the potential transportation and circulation impacts of the proposed project are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts of the proposed project. Please also see the response to comment R-1 regarding community character. As demonstrated in Section 5.1, *Land Use*, and 5.2, *Transportation and Circulation*, of the DEIR, the proposed project would be consistent with all applicable plans, policies, and goals of the General Plan, Bicycle Master Plan, Serra Mesa Community Plan, and Mission Valley Community Plan. Therefore, no changes to the FEIR are warranted as a result of this comment.

DD-155: This comment suggests that Phyllis Place, Via Alta, and Franklin Ridge Road would be severely overloaded with cars and asks if it is acceptable to change the classification of a two-lane collector to a “major roadway” if the roadway is not widened to meet the classifications of a major road. In addition, the commenter expresses concern about connecting major streets in residential neighborhoods when bedroom windows are within 10 feet of the roadway.

Section 15126.4 of the State CEQA Guidelines requires that an EIR describe feasible measures which could minimize significant adverse impacts. As detailed in Section 5.2, *Transportation and Circulation*, of the DEIR, mitigation measures are proposed for significant impacts identified along the roadway segments of Phyllis Place and Franklin Ridge Road. No significant impacts were identified along Via Alta as a result of the proposed project. Mitigation measures MM-TRAF-3 and MM-TRAF-11 require widening Phyllis Place from Franklin Ridge Road to the I-805 SB ramps, while mitigation measure MM-TRAF-8 requires widening Franklin Ridge Road from Via Alta to Civita Boulevard. It should be noted that Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan and the widening required by mitigation measures MM-TRAF-3 and MM-TRAF-11 would be consistent with the Community Plan. In the event that these mitigation measures are not able to be implemented, then the classification of these roadways would not change.

DD-156: This comment suggests the proposed project would cause most roads to reach LOS D, E, or F and asks for an explanation as to how this would improve traffic circulation and congestion.

The proposed project’s potential impacts on transportation and circulation are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of significant

transportation and circulation impacts of the proposed project. As demonstrated in Section 5.2, *Transportation and Circulation*, with implementation of the project, several roadway segments would experience a net decrease in the volume to capacity ratio, while several intersections would experience a net increase in delay. Although operations at some roadway segments and intersections would worsen, the redistribution of traffic that would result from the proposed roadway connection would improve conditions at various other roadway facilities. All of the significance determinations in the DEIR are supported by the impact analysis, which in turn is supported by substantial evidence. No changes to the FEIR are warranted as a result of this comment.

DD-157: The commenter expresses the opinion that introducing 25,000 cars to I-805 will not help traffic circulation and congestion, and would back into the neighborhoods and asks how the proposed project would meet the goal of reducing congestion.

Please see the responses to comments DD-97, DD-134, and DD-140, which address the fact that the proposed project would not generate new vehicle trips, but rather would redistribute vehicle trips onto other existing transportation infrastructure. Please also see response to comment CN-11 for a discussion of how the proposed project meets Project Objective #3 to alleviate traffic congestion and improve circulation. Moreover, the commenter does not provide any evidence to support her opinion or indicate how it is different from the conclusions reached in the DEIR, which does indicate there would be significant and unavoidable impacts related to transportation and circulation. Please see Section 5.2, *Transportation and Circulation*, of the DEIR.

DD-158: This comment expresses the opinion that the proposed project would result in traffic impacts listed by the commenter, and suggests these impacts are not mitigatable and are significant. The commenter also suggests that LOS F is a significant impact per the City of San Diego and lists the delays indicated by the City's Significance Thresholds.

The proposed project's potential impacts on transportation and circulation are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of significant transportation and circulation impacts of the proposed project. This comment does not specifically raise issue regarding the adequacy of the DEIR.

DD-159: This comment asks what the current classification of Franklin Ridge Road is, what it would be classified as after the proposed project, and if it would be widened in the future. The commenter asks if crosswalks will be added, and if roads carrying vehicles only 10 feet from residences are safe for the residents of Civita. The commenter questions if proximity to houses was considered in the DEIR.

As described in Section 5.2, *Transportation and Circulation*, of the DEIR, Franklin Ridge Road is classified as a two-lane Major Arterial with a landscaped median and left-turn pockets throughout. Based on the impact analysis contained in Section 5.2, the proposed project would result in a significant impact along Franklin Ridge Road from Via Alta to Civita Boulevard under the long-term scenario. As a result, mitigation measure MM-TRAF-8 is proposed, which requires the widening of Franklin Ridge Road to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Franklin Ridge Road would be a four-lane Collector. Please see the responses to comments F-4 and F-5 regarding pedestrian safety and circulation. The proximity of sensitive receptors such as homes to the additional traffic along study area roadways and intersections was evaluated in Section 5.4, *Noise*, of the DEIR. As detailed in Section 5.4, the project would have a less than significant impact on operational noise. The fact that residences are located

“10 feet” from a roadway does not correlate to safety hazards from vehicle traffic as implied by the commenter. Additionally, the commenter does not provide any evidence to support this assertion. No revisions to the FEIR are warranted as a result of this comment.

DD-160: This comment provides a list of roads with significant long-term intersection level of service impacts and questions why VMT was used in the DEIR to determine significance and did not account for speed or grade at which these miles are traveled, lowering gas mileage and increasing impacts to very significant. The commenter asks for data to support VMT as being a superior method of determining significance when actual emissions are accounted for.

This comment is similar to comments G-87 and G-90. Please see the responses to those comments.

DD-161: This comment questions how widening Phyllis Place to 5-lanes preserves the neighborhood to the west, if there is room to do so, and if it would impact the park, the church parking lot, or the retirement facility. The commenter asks if a crosswalk would be added to Phyllis Place, and why or why not.

Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan. As detailed in Section 5.2, *Transportation and Circulation*, of the DEIR, the widening required by mitigation measures MM-TRAF-3 and MM-TRAF-11 would be consistent with the Community Plan. Please refer to Figure 3-5a in the DEIR; the park has been designed with the widening of Phyllis Place in mind if the proposed project were to be approved. As such, the widening of Phyllis Place would not reduce the size of the future Phyllis Place Park. No additional right-of-way would be required for the widening of Phyllis Place that could impact the Church parking lot or the City View Retirement Apartments referenced by the commenter. Please see the response to comment F-4 regarding the inclusion of pedestrian crossings in accordance with the City’s Street Design Manual (2002).

DD-162: This comment includes several questions concerning a mitigation measure (MM-TRAF-9) quoted in the text, including if the mitigation measure has to be implemented, who would pay for it, and several other similar questions.

The potential environmental impacts of the proposed project are analyzed and disclosed in the DEIR. Section 15126.4 of the State CEQA Guidelines requires that an EIR describe feasible measures which could minimize significant adverse impacts. The implementation of mitigation measures identified to reduce significant environmental impacts is required to the extent that their implementation is feasible. The feasibility of mitigation measures are discussed in the Findings, which take into account specific economic, legal, social, technological, or other considerations that may make the mitigation measures identified in the FEIR infeasible. The Findings are provided to the decision making body for use in determining whether to approve a proposed project. A discussion of the requirements to implement the various mitigation measures, such as any removal of bike lanes and/or parking, can be found in Section 5.2, *Transportation and Circulation*, of the DEIR. In addition, mitigation measures MM-TRAF-1 through MM-TRAF-19 have been clarified to include a discussion of potential secondary effects associated with their implementation. However, no new impacts requiring recirculation of the DEIR were identified. Please see the response to comment V-3 for the timing of implementing the mitigation measures identified in the EIR. The commenter’s numerous questions related to the funding of mitigation measures are economic issues that are not under the domain of CEQA unless it is attributed to a specific physical impact on the environment or is related to the feasibility of a mitigation measure. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

DD-163: This comment provides language that the commenter wishes to be added in support of the No Project Alternative. The commenter suggests the existing conditions meet the goals of the project and the proposed project would not improve access on the community level.

The comment express an opinion about the No Project Alternative and its ability to meet the needs of the community; however, the evidence provided is based on conjecture and unsubstantiated opinion. The commenter also mentions the project adding 43 minutes of delay to a freeway; please see the response to comment G-81 regarding the I-805 Freeway Ramp Analysis. Moreover, please see the response to comment G-185, which provides a summary of why the project is being considered, including the project objectives. As discussed in Chapter 9, Alternatives, of the DEIR, the No Project Alternative would not meet any of the project objectives.

DD-164: This comment suggests Phyllis Place does not have any traffic problems currently, already has emergency access points, and suggests there are already several connections to I-805 and the surrounding neighborhoods. The commenter asks for an explanation as to how the proposed project would provide a more efficient, integrated circulation network and reduce congestion at the community level. The commenter asks if VMT matters if the shortest distance is through a residential area.

Although the comment is focused on the local neighborhood and the lack of traffic congestion at this time, the proposed project would be oriented to future growth associated with the planned buildout of the Serra Mesa and Mission Valley community plans. As the area continues to see growth, including development of up to 4,780 residential units and over 1,200,000 square feet of commercial, office/business park, and retail space, more access points to local and regional facilities will be required. Similarly, additional access would provide additional evacuation and emergency response routes for police and fire responders. Please see the response to comment DD-140 as it relates to the redistribution of trips to be more efficient as it relates to vehicle miles traveled. Please also see the response to comment DD-127, which indicates that the additional trips would not travel into the existing residential neighborhoods in Serra Mesa, located west of the proposed roadway. Rather, trips would generally be focused in areas that provide additional access to local and regional destinations. As such, VMT would not be reduced by traveling through low-density residential neighborhoods.

DD-165: The commenter suggests the planned trail would provide better access to transit for Serra Mesa residents than the proposed project and requests a study of the benefits of not approving the roadway connection be done.

There is no requirement under CEQA to study the benefits of not approving a proposed project. However, there is the requirement to prepare a comparative analysis of the environmental effects of the No Project Alternative. This requirement is satisfied in Chapter 9, Alternatives, of the DEIR and within the project's Findings. In regards to the multi-modal considerations of the proposed project, please see the response to comment DD-13.

DD-166: This comment suggests the roadway connection would not be efficient based on LOS F and delays at the onramps increasing to 43 minute delays.

The proposed project's potential impacts on transportation and circulation are analyzed and disclosed in the DEIR. Please see the response to comment G-81 regarding the I-805 Freeway Ramp Analysis and the response to comment P-1 for a summary of significant transportation and

circulation impacts of the proposed project. No revisions to the FEIR are warranted as a result of this comment.

DD-167: This comment indicates the project would increase congestion and there is already emergency access points and linkages for disabled people, pedestrians, and bicyclists. The comment asks if the proposed project would add a bike lane or planned path with 35,000 cars. The commenter asks for an explanation as to how this information is incorporated into the conclusion that the proposed project would relieve congestions.

Please see the response to comment DD-140, which explains how the project would not generate any new vehicle trips. In addition, please see the response to comment G-18 regarding existing access via Kaplan Drive. Please also see the responses to comments F-4 and F-5 regarding pedestrian circulation and the design of the proposed roadway, which would be consistent with the City's Street Design Manual. The proposed roadway would also include a Class II Bike Lane facility that is included within the City's Bicycle Master Plan. Please see the improvements and impacts related to vehicle congestion in Section 5.2, *Transportation and Circulation*, of the DEIR. The significant environmental impacts of the proposed project are analyzed and disclosed in the DEIR. No revisions to the FEIR are warranted as a result of this comment.

DD-168: This comment repeats previous concerns that the proposed project would not reduce congestion but would increase congestion and would be less efficient; expresses concerns about widening Phyllis Place to 5 lanes because it would not preserve the neighborhood character; and expresses the opinion that stating the proposed project would provide benefits, when the benefits currently exist, is inappropriate and incorrect.

The proposed project's potential impacts on transportation and circulation are analyzed and disclosed in the DEIR. Please see the response to comment P-1 for a summary of significant transportation and circulation impacts of the proposed project. Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan. As detailed in Section 5.2, *Transportation and Circulation*, of the DEIR, the widening required by mitigation measures MM-TRAF-3 and MM-TRAF-11 would be consistent with the Community Plan. The commenter does not specify where a statement that the proposed connection would provide benefits is located in the DEIR. Therefore, a specific response to that comment cannot be provided. Additionally, CEQA does not require a discussion of the benefits of a proposed project; however, the benefits of the project are described in the Statement of Overriding Considerations which the decision-makers will need to consider in order to determine if the benefits of the project outweigh the environmental impacts. No revisions to the FEIR are warranted as a result of this comment.

DD-169: This comment suggests a road would decrease walkability and create potential hazardous conditions to the public. The commenter expresses the opinion that the Mission Valley Community Plan and the City of San Diego General Plan indicate proximity to vehicles increases the likelihood of accidents and with 35,000 cars the project would increase hazards significantly.

The proposed project's potential to create hazardous conditions for pedestrians and bicyclists was evaluated in Section 5.2, *Transportation and Circulation*, of the DEIR. Please see the responses to comments F-4 and F-5 regarding internal circulation and design of the proposed roadway, as well as the response to comment G-50 regarding pedestrian hazards. As detailed in Section 5.2, the proposed project would require a signalized intersection along Phyllis Place, which would in turn result in possibly unsafe conditions for motorists entering or exiting the City View Church parking lot, as the driveway would be approximately 150 feet east of the signalized intersection. Mitigation

was identified that would reduce this impact to below a level of significance; however, due to the uncertainty of being able to implement this measure, it was determined that this impact would remain significant and unavoidable. However, the City intends to work with the developer, City View Church, and any other stakeholders to determine if the design considerations would reduce or eliminate the impact. To be conservative in the analysis, however, the impact is considered significant and unavoidable. No revisions to the FEIR are warranted as a result of this comment.

DD-170: This comment poses questions about how the traffic study was conducted and how the results were found. The commenter expresses the opinion that the traffic study was not adequate and should be removed from the EIR.

This comment is similar to comment G-126. Please see the response to that comment.

DD-171: This comment suggests the emergency evacuation that would be provided by the road connection has limited benefit to the over 200 homes near the connection. As cited by the commenter and as discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, there currently is only one route of access to the more than 200 homes in Serra Mesa at the *western [emphasis added]* end of Phyllis Place on the north rim of Mission Valley. While the DEIR concluded that there would be some additional benefit to these approximately 200 homes for evacuation with the road connection, the proposed roadway connection would improve overall emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. It is logical to conclude that having a greater number of emergency access points and routes would improve emergency response in an area. As confirmed with the San Diego Fire-Rescue Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. Moreover, as noted in Section 5.2, driving times to hospitals and fire stations would improve with the project. No revisions to the FEIR are warranted as a result of this comment.

DD-172: This comment suggests, despite statements in the DEIR, that the proposed project would not encourage walkability or local circulation.

Please see the responses to comments F-4, F-5, and G-50, which discuss pedestrian safety and circulation. The proposed roadway would include sidewalks, and the intersection at Phyllis Place would be signalized and include a signalized pedestrian crossing. Please also see the response to comment G-118 regarding the origins and destinations of each of the trips that pass through the proposed roadway connection. No revisions to the FEIR are warranted as a result of this comment.

DD-173: This comment expresses the opinion, despite statements in the DEIR, that the proposed project would make transit and parks less available and negatively impact pedestrians and cyclists.

The various concerns raised by the commenter are similar to those provided in comments G-108, K-27, BQ-8, CM-1, and DD-134. Please see the responses to those comments.

DD-174: This comment questions how the 42 minute delays would not alter present circulation movement to beaches, parks, and other open spaces.

Please see the response to comment DD-5. Although there would be some roads and intersections in the vicinity that would experience more delay than with the project, other intersections and roadways would see a decrease in delays. Much of this additional delay with the project would be from the traffic generated by the future development of the Civita community. The roadway connection would provide easier access to and from existing and future development, including

Civita. As such, if there was additional delay in one location, there would be a decrease in another area. Because there would be additional options for drivers, the number of vehicle miles traveled would decrease compared to the future condition without the project. Please also see the response to comment G-126 for a discussion of how changes in community access travel times were determined. As demonstrated in Table 5.2-23 of Section 5.2, *Transportation and Circulation*, of the DEIR, accessibility to a variety of public facilities and amenities increases with the road connection, including community parks. No revisions to the FEIR are warranted as a result of this comment.

DD-175: This comment suggests the proposed project would conflict with adopted policies by encouraging vehicle use and expresses the opinion that the conclusion the proposed project would help pedestrians or cyclists is false.

The concerns raised by the commenter are similar to those provided in comments DD-2, DD-134, and DD-149. Please see the responses to those comments.

DD-176: This comment expresses the opinion that bike access already exists so the proposed project would not provide additional access, suggesting that currently the planned bike path without vehicular traffic is better for cyclists and would improve connectivity.

The comment does not specify which plan bicycle access is already included in, nor does it identify where the referenced access would be located. The proposed roadway connection will include sidewalks for pedestrians, and a Class II bicycle facility for bicyclists. Please also see the responses to comments DD-21 and G-187 for a discussion of the bike path referenced by the commenter and pedestrian trail through Phyllis Place Park.

DD-177: This comment suggests there is already walking connection in the community, and the proposed project would not increase pedestrian connectivity.

The commenter cites an excerpt from Section 5.2, *Transportation and Circulation*, of the DEIR, but fails to include the remainder of the supporting analysis from the DEIR. As stated in Section 5.2, the proposed project would include sidewalks along both sides of the roadway, thus allowing a dedicated pedestrian connection between the Mission Valley and Serra Mesa communities in the vicinity of Phyllis Place. The Pedestrian Master Plan does state that “pedestrian attractors” are typically schools, transit stations, parks facilities, neighborhood retail, and community-serving destinations (e.g., libraries, post offices). The proposed roadway is approximately 4,000 feet northeast of the Rio Vista trolley stop. The proposed roadway will also be adjacent to commercial uses, parks, and potentially a school use within the Quarry Falls development. Therefore, the project would generally increase pedestrian connectivity in an area that is adjacent to transit and other “pedestrian attractors” such as commercial uses and parks. The proposed project would create a new pedestrian connection where one currently does not exist. The addition of new pedestrian access clearly correlates to increased pedestrian connectivity because the project would create additional pedestrian access where one does not currently exist.

DD-178: This comment indicates that Phyllis Place would deteriorate to LOS F under the future condition and asks why it was not studied as a hotspot. The commenter asks why the retirement facilities are not considered as sensitive receptors. The commenter repeats the opinion that the proposed project should be rejected and the No Project Alternative should be selected.

Please see the responses to comments G-129 through G-132 and G-134 for a discussion of the CO hotspot analysis conducted for the project. The commenter’s opinion that the proposed project does not show a significant reduction in traffic or congestion are not supported by substantial evidence.

In addition, it is unclear which objectives the commenter states do not accurately describe the underlying goal under CEQA. Please see the response to comment G-14 regarding the formulation of the project objectives. Furthermore, an analysis of the No Project Alternative is included in Chapter 9, Alternatives, of the DEIR. Please see that section for the results of the alternatives analysis. No revisions to the FEIR are warranted as a result of this comment.

DD-179: This comment suggests the proposed roadway would operate at a LOS F and the air quality would worsen, and therefore the No Project Alternative would be superior.

Please see the response to comment DD-178. All of the environmental concerns raised by the commenter are analyzed, and the impacts are disclosed, in the DEIR. Please see Sections 5.2, *Transportation and Circulation*, and 5.3, *Air Quality*, of the DEIR. Please also see Chapter 9, Alternatives, of the DEIR, which includes an analysis of the project alternatives, including a comparison of the impacts of the proposed project and the impacts of the project alternatives. No revisions to the FEIR are warranted as a result of this comment.

DD-180: This comment restates the significant cumulative traffic impacts of the proposed project. As required under CEQA, mitigation measures are proposed to reduce significant impacts of the project. Please see Chapter 9, Alternatives, of the DEIR, which includes an analysis of the project alternatives, including a comparison of the impacts of the proposed project and the impacts of the project alternatives. No revisions to the FEIR are warranted as a result of this comment.

DD-181: This comment raises similar concerns as those provided in comment DD-78. Please see the response to that comment.

DD-182: The commenter suggests the proposed project would not induce population growth but is a result of the population growth in Mission Valley, and it would make future development easier to build. The commenter suggests the proposed project would increase density beyond the community plan of Serra Mesa.

The commenter's opinion that the proposed roadway connection would make future development easier to build, lower impact fees for businesses, and induce population growth are not supported by substantial evidence. Additionally, the commenter does not provide any evidence as to how the proposed roadway connection would increase density/intensity beyond the Serra Mesa community, which is largely a developed community. No revisions to the FEIR are warranted as a result of this comment.

DD-183: This comment questions how the proposed project would alter the distribution and density of Serra Mesa's current low-density residential streets such as Phyllis Place and suggests homes would be removed by one of the mitigation measures.

The CEQA issue cited by the commenter (Issue 2, Section 7.6, Population and Housing, of the DEIR) relates to a proposed project resulting in the displacement of housing units. The various concerns raised by the commenter do not relate to Issue 2. Furthermore, none of the mitigation measures identified in the DEIR would require the removal of any homes on Murray Ridge Road or otherwise. It is acknowledged that the proposed roadway connection is not currently in the Serra Mesa Community Plan, which is why the proposed project consists of an amendment to the Serra Mesa Community Plan to include the proposed roadway connection. Additionally, as detailed in Section 7.6 of the DEIR, the proposed project would not induce population growth, and impacts were determined to be less than significant. No revisions to the FEIR are warranted as a result of this comment.

DD-184: This comment expresses the opinion that Issue 2 was repeated in the revised DEIR and Issue 3 from the PEIR was not included. The commenter asks for clarifications on the cost of infrastructure not assumed in the Community Plan and capital improvements plan.

The commenter is incorrect in stating that Issue 2 was repeated in the DEIR. As detailed in Section 7.6, Population and Housing, of the DEIR, Issue 2 asks if the proposed project would displace a substantial number of *existing housing units* [emphasis added], necessitating the construction of replacement housing elsewhere, while Issue 3 asks if the proposed project would displace a substantial number of *people* [emphasis added], necessitating the construction of replacement housing elsewhere. These issues are based on Appendix G of the State CEQA Guidelines. The potential environmental impacts related to Issue 3 from the previous PEIR are discussed in Section 8.3 of the recirculated DEIR. The commenter's various questions related to the costs of mitigation and infrastructure are economic issues that are not under the domain of CEQA unless it is attributed to a specific physical impact on the environment or is related to the feasibility of a mitigation measure. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR. No revisions to the FEIR are warranted as a result of this comment.

DD-185: This comment suggests the area is zoned for low-density residential and the new traffic restrictions would significantly impact the population and housing in the Civita and Abbotts Hill area.

Please see the responses to comments DD-182 through DD-184. The proposed project would not induce substantial population growth in the area, and therefore would have no effect on the Low-Density Residential zoning of the project area. No revisions to the FEIR are warranted as a result of this comment.

DD-186: This comment suggests the current access would be easier and faster than the new road with increased traffic. The commenter asks several questions about the emergency access, safety, and crosswalks associated with the proposed project.

Please see the response to comment DD-2 regarding response times. Please also see the responses to comments F-4 and F-5 regarding pedestrian safety and circulation. Additionally, Phyllis Place is designated as a four-lane major by the Serra Mesa Community Plan, and the widening would be consistent with the Community Plan. No changes to the FEIR are warranted as a result of this comment.

DD-187: This comment is similar to comment DD-2; please see the response to that comment.

DD-188: This comment suggests the safety of the children attending the proposed school at Via Alta would be impacted by increased traffic.

Please see the responses to comments F-4 and F-5 regarding pedestrian safety at the planned school and pedestrian circulation.

DD-189: This comment expresses the opinion that the proposed project would not increase pedestrian and bicycle access due to the increased traffic, and furthermore, a pedestrian and bicycle access already exists.

The issues raised in this comment are similar to those provided in comments DD-2 and DD-21. Please see the responses to those comments.

DD-190: This comment expresses the opinion that the traffic studies conducted as part of the DEIR prove the proposed project would not improve circulation efficiency, and suggests the added traffic will decrease emergency access.

This comment is similar to comment DD-2; please see the response to that comment.

DD-191: This comment repeats the concerns of comment DD-190.

This comment is similar to comment DD-2; please see the response to that comment.

DD-192: This comment asks how the response times would be improved when they are already at acceptable levels and the DEIR says it would not help the residents close to the connection.

The issues raised in this comment are similar to those provided in comments DD-2 and DD-171. Please see the responses to those comments.

DD-193: This comment claims a statement in Chapter 7 is false and questions how circulation would be improved and how emergency access would be improved as a result of the proposed project.

This comment is similar to comment DD-2; please see the response to that comment.

DD-194: This comment questions if the pipeline under the proposed roadway would be moved, and asks how the pipeline would be accessed in case of an emergency.

Please see the responses to comment within Letter I (SDG&E) and G-183 for details regarding the relocation of the existing gas line.

DD-195: This comment questions how the area designated as low-density residential would support large density traffic. The commenter asks where cars will park if parking is removed from Phyllis place.

Please see the responses to comments DD-182 through DD-185. In addition, the widening of Phyllis Place would not result in any loss of parking. No changes to the FEIR are warranted as a result of this comment.

DD-196: This comment requests the language be updated regarding impacts to neighborhood character.

It is unclear where the text cited by the commenter originated from and what conclusions the commenter requests to be added. Therefore, no specific response can be provided. Additionally, please see the response to comment R-1 regarding community character.

DD-197: This comment asks what the cost of the mitigations measures would be, if all mitigation measures would be implemented, and in what time frame.

The commenter's questions regarding the costs of the mitigation measures are an economic issue that is not under the domain of CEQA unless it is attributed to a specific physical impact on the environment or the feasibility of a mitigation measure. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR. In compliance with CEQA, all feasible mitigation measures identified in the EIR would be implemented and none would be economically infeasible. Please see the response to comment V-3 regarding the timing of mitigation measure implementation.

DD-198: This comment refers to the low-density residential area in the vicinity of the proposed project site and suggests it is not planned for a density or growth rate of the population from Mission Valley.

It is unclear what the commenter is requesting an explanation of what was not considered in the analysis. Please see the response to comment DD-97. As detailed in Section 8.8.3 of the DEIR, the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The proposed roadway would accommodate existing and planned near-term growth within the vicinity of the project site. The Low-Density Residential land use designation of the project site is consistent with the Serra Mesa Community Plan. The proposed project does not propose any changes to this density, and aside from the roadway and supporting facilities, no development of land uses would occur. No changes to the FEIR are warranted as a result of this comment.

DD-199: The commenter asks what the costs of the Capital Improvements are. Please see the response to comment DD-197. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR.

DD-200: This comment asks for further explanation as to how the proposed project would not generate significant new traffic when all the roads in the area will be going from LOS A, B, and C, to E and F, with delays of 43 minutes at peak time.

Please see the response to comment DD-140 for a discussion of how the project would redistribute vehicle trips, rather than generate new trips, and the response to comment G-81 regarding the 43-minutes of delay referenced by the commenter. All potential transportation and circulation impacts of the proposed project are analyzed and disclosed in Section 5.2, *Transportation and Circulation*, of the DEIR, which are based on the results of the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts of the proposed project. No changes to the FEIR are warranted as a result of this comment.

DD-201: This comment suggests Serra Mesa cannot support future development because there is already a delay to get onto I-805, and the low-density residential area west of the proposed connection will be separated from the rest of the Serra Mesa Community.

Please see the response to comment D-97 for a discussion of how the project would not induce population growth, either directly or indirectly. Please also see the response to comment G-102 for a discussion of how the project would not separate or divide the Serra Mesa Community. No changes to the FEIR are warranted as a result of this comment.

DD-202: This comment suggests the proposed project will alter the Serra Mesa Community Plan, the distribution of traffic, and density in the area, and the commenter asks if it will be proven that the proposed project will not substantially effect the population of this area.

Please see the response to comment to comment R-1 regarding community character. This comment also raises similar issues to those provided in comments DD-97 and DD-182 through DD-185. Please see the responses to those comments. The changes in traffic distribution on study area roadways due to the proposed project are analyzed, and the potential impacts are disclosed, in Section 5.2, *Transportation and Circulation*, of the DEIR. No changes to the FEIR are warranted as a result of this comment.

DD-203: This comment asks why the Mission Valley Community Plan is not being resolved to be consistent with the Serra Mesa Community Plan. The commenter expresses the opinion that this would result in less government money spent and better circulation and safety between the two communities.

No evidence to support the commenter's opinion is presented for consideration. This comment is similar to comment DD-8; please see the response to that comment.

DD-204: This comment expresses the opinion that the traffic studies included in the DEIR prove the proposed project would not improve circulation and quotes objective #2. This comment is similar to comment DD-14; please see the response to that comment.

DD-205: This comment includes the same statements as comment DD-204, but as it relates to project objective #3. Please see the responses to comments H-6 and CN-11 for a discussion of how the proposed project would meet project objective #3.

DD-206: This comment suggests Kaplan Drive needs to be considered in the analysis and states objective #4.

Please see the responses to comments G-18 and DD-2. The FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2, *Transportation and Circulation*). The addition of this clarifying information does not affect the conclusions reached within the DEIR. Please also see the responses to comments H-8 and CN-8 for a discussion of how the proposed project would meet project objective #4.

DD-207: This comment asks how allowing vehicular traffic on paths currently approved and planned for only cyclists and pedestrians is safer.

Please see the response to comment CN-8 for a discussion of how the proposed project would meet project objective #5. Please also see the response to comment DD-21 for a discussion of the future bike path referenced by the commenter and pedestrian trail through Phyllis Place Park.

DD-208: This comment asks why an objective from the PEIR was removed in the recirculated DEIR and expresses the opinion that the No Project Alternative is superior.

Please see the response to comment K-11 regarding changes to the project objectives from the previous Program EIR. The project's conformance with the General Plan and other applicable City regulations and policies is detailed within Section 5.1, *Land Use*, of the DEIR, while the project's conformance with the Bicycle Master Plan is detailed within Section 5.2, *Transportation and Circulation*, of the DEIR. As detailed in Sections 5.1 and 5.2, the proposed project would not conflict with any of these land use plans. Please see the response to comment DD-21 for a discussion of the bike path referenced by the commenter and pedestrian trail through Phyllis Place Park. Please also see the response to comment F-4 regarding pedestrian safety and the design of the proposed roadway, which would be consistent with the City's Street Design Manual. No changes to the FEIR are warranted as a result of this comment.

DD-209: This comment references Appendix C of the DEIR and suggests the analysis therein is proof that the No Project Alternative would include the connection for pedestrians and cyclists in compliance with the General Plan and the Bicycle Master Plan.

The project's conformance with the General Plan and other applicable City regulations and policies is detailed within Section 5.1, *Land Use*, of the DEIR, while the project's conformance with the

Bicycle Master Plan is detailed within Section 5.2, *Transportation and Circulation*, of the DEIR. As detailed in Sections 5.1 and 5.2, the proposed project would not conflict with any of these land use plans. In addition, as detailed in Chapter 9, Alternatives, of the DEIR, the No Project Alternative would not meet any of the project objectives.

DD-210: This comment refers to Chapter 9 of the DEIR and expresses the opinion that the studies in the DEIR show the proposed project would be more negatively impactful for Serra Mesa than not having the roadway connection.

This comment correctly states that not all mitigation proposed would reduce certain significant transportation-related impacts to less than significant levels, all of which is disclosed in the DEIR. Chapter 9, Alternatives, of the DEIR, does conclude that the No Project Alternative would have fewer impacts in some areas, but more significant impacts in others. However, the No Project Alternative would not meet any of the project objectives. All of the less than significant impact determinations identified in the DEIR for transportation and circulation impacts are based on the City of San Diego Traffic Impact Significance Thresholds, which are provided in Table 5.2-9 of the DEIR. Please see responses to DD-13, G-187 through G-191, DD-64, DD-66 through DD-71, DD-74, DD-76, DD-78, DD-79, and DD-95. No changes to the FEIR are warranted as a result of this comment.

DD-211: This comment refers to Chapter 9, Alternatives, of the DEIR, and suggests that feasible alternatives have been overlooked and not analyzed as required by CEQA and there are superior alternatives to the project.

The commenter does not identify any specific feasible alternatives that have been overlooked in the DEIR, nor does the commenter provide any specific alternatives that would be “superior” to the proposed project.

DD-212: This comment sets forth numerous allegations regarding purported project impacts and provides the commenter’s opinion that the project fails to meet the most basic project objectives. The commenter also expresses the opinion that the alternatives were not accurately studied. The statements raised by the commenter have been previously addressed within multiple responses above and are analyzed in the DEIR. This comment raises concerns similar to those provided in previous comments that have already been addressed. Please refer to all previous responses to comments and the DEIR for a description of all of the project’s impacts along with the required mitigation should the project be implemented.

DD-213: This comment refers to Chapter 9, Alternatives, of the DEIR and asks why other sites currently in the community plan were not considered for access to Mission Valley. The commenter asks why the Unnamed Road on the east side of I-805 was not considered, or why access from Qualcomm and Texas near I-8 was not considered

The two alternative alignments considered in the Alternate Location Alternative would be slightly east of the proposed roadway, within the Quarry Falls development. However, it was determined that these alignments would not meet minimum design requirements for traffic signal spacing, and would be too close to the existing I-805 ramps. Therefore, these alignments would potentially be infeasible from a technical standpoint, and have been eliminated from detailed consideration. The referenced unnamed roadway is a private driveway that leads to a San Diego Gas and Electric facility. It is not a public roadway and is not accessible by the public, which is why it is not named. As the roadway is a private road maintained by a private organization, it would not be feasible to utilize the roadway. The other alternatives suggested by the commenter were not considered because they

would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa and improving local mobility in the Serra Mesa and Mission Valley planning areas. No changes to the FEIR are warranted as a result of this comment.

DD-214: This comment refers to Chapter 9, Alternatives, of the DEIR and asks why the alternative to amend the Mission Valley Community Plan to remove the mention of a road connection was rejected. The commenter suggests the proposed project would increase congestion, decrease safety, and encourage vehicular travel over mass transit.

This comment raises similar concerns as those provided in comments H-3 and DD-8. Please see the responses to those comments.

DD-215: This comment refers to Chapter 9, Alternatives, of the DEIR and suggests that the No Project Alternative would have a reduced impact on land use by encouraging mass transit.

This comment raises similar concerns as those provided in comments H-3 and DD-8. Please see the responses to those comments. An analysis of why the No Project Alternative would result in greater land use impacts than the proposed project is detailed in Chapter 9, Alternatives, of the DEIR.

DD-216: This comment expresses the opinion that the proposed project does not relieve vehicle congestion. This comment is identical to comment DD-147. Please see the response to that comment.

DD-217: This comment suggests the proposed project does not allow safe and efficient street design and does not minimize environmental impacts. This comment is identical to comment DD-148. Please see the response to that comment.

DD-218: This comment suggests that if the proposed project is approved that it would encourage vehicle travel and therefore not be consistent with the General Plan. This comment is identical to comment DD-149. Please see the response to that comment.

DD-219: The commenter suggests the proposed project does not achieve the desired community character. This comment is identical to comment DD-150. Please see the response to that comment.

DD-220: This comment asks how public opinion will be considered in the approval of the FEIR. This comment is identical to comment DD-151. Please see the response to that comment.

DD-221: This comment suggests that collector roads are specifically for routes to schools, parks, and village centers, not to gain access to a major freeway. This comment is identical to comment DD-152. Please see the response to that comment.

DD-222: This comment suggests the proposed project would form barriers for pedestrians due to increased traffic congestion, noise, and air pollution. This comment is identical to comment DD-153. Please see the response to that comment.

DD-223: This comment suggests that delays on the 805 on-ramps would directly impede traffic flow on Phyllis Place. This comment is identical to comment DD-154. Please see the response to that comment.

The DEIR does not include any statements indicating that traffic would *not* be redistributed onto Phyllis Place, which is identified as a future four-lane major by the Serra Mesa Community Plan. The results of the traffic analysis are detailed in Section 5.2, *Transportation and Circulation*, of the DEIR,

which identifies changes in traffic volumes, level of service, and delay that would result from the proposed project. All potential transportation and circulation impacts of the proposed project are analyzed and disclosed in Section 5.2 of the DEIR. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts of the proposed project. No changes to the FEIR are warranted as a result of this comment.

DD-224: This comment asks why the DEIR did not include the statement that noise in Civita would be reduced without the proposed project.

As detailed in Section 5.4, *Noise*, of the DEIR, operational (traffic) noise was analyzed at twelve noise-sensitive receptors (R1 through R12), which included multiple residences within Civita. Table 5.4-7 and Table 5.4-8 show the changes in noise levels at the various sensitive receptors analyzed as a result of operational (traffic) noise. Based on the results of the noise analysis, no significant operational noise impacts were identified. Regarding the commenter's question about a bottle neck effect on Franklin Ridge Road, all potential transportation and circulation impacts of the proposed project are analyzed and disclosed in Section 5.2 of the DEIR. Please see the response to comment P-1 for a summary of the significant transportation and circulation impacts of the proposed project. No changes to the FEIR are warranted as a result of this comment.

DD-225: This comment is an introductory statement indicating that the commenter is providing specific comments on the project objectives in relation to the No Project Alternative, and that the commenter is expressing the opinion that the No Project Alternative would meet the project objectives better than the proposed project. This comment does not address the adequacy of the DEIR.

DD-226: This comment refers to the first project objective and suggests that the Mission Valley Community Plan should be amended to meet this project objective. Amending the Mission Valley Community Plan is not the same as the No Project Alternative. The No Build/Remove from Mission Valley Community Plan Alternative was evaluated within Section 9.4.1.2 of the DEIR. Please see the response to comment DD-8.

DD-227: This comment refers to the second and third project objectives and suggests circulation would be improved by the pedestrian and bicycle paths that are already planned for the project site, as well as Kaplan Drive. The commenter suggests encouraging mass transit use would improve circulation and that the proposed project would make traffic congestion worse.

The concerns raised in this comment are similar to those provided in previous comments that have already been addressed, please see the responses to comment DD-14, DD-157, and D-205.

DD-228: This comment refers to the fourth project objective. The commenter suggests that the No Project Alternative would not increase traffic and would provide emergency access and asks why Kaplan Drive was not considered in the DEIR. The concerns raised in this comment are similar to those provided in comment DD-2. In addition, please see Chapter 9, Alternatives, of the DEIR for a comparative analysis of the No Project Alternative and Section 9.5.1 of the DEIR for a discussion of the No Project Alternative's ability to meet the project objectives.

DD-229: The commenter expresses the opinion that the No Project Alternative would meet project objective 5 and provides several reasons in support of this opinion. A discussion of the No Project Alternative's ability to meet the project objectives are detailed in Section 9.5.1 of the DEIR. No changes to the FEIR are warranted as a result of this comment.

DD-230: This comment restates an objective from the previously circulated DEIR (July 2016) that is not included within the recirculated DEIR. The concerns raised in this comment are similar to those provided in comments H-9, DD-2, and DD-208. Please see the responses to those comments. Please also see the response to comment R-1 regarding community character and the responses to comments F-4 and F-5 regarding pedestrian safety.

DD-231: This comment acts as a conclusory statement and suggests the No Project Alternative would eliminate the environmental impacts associated with the proposed project, and would meet all of the project objects except for the first objective, which the commenter claims is an unfair objective. The commenter expresses the opinion that the first objective could be met by a plan amendment to the Mission Valley Community Plan rather than the Serra Mesa Community Plan.

The DEIR adequately analyzes the potential impacts associated with the No Project Alternative. Table 9-2 in Chapter 9, Alternatives, of the DEIR provides a comparison of the impacts of the No Project Alternative with those of the proposed project. The commenter fails to explain how project objective 1 is an unfair objective and is too narrow. Please see page 3-1 of the DEIR, which lists the project objectives. These project objectives include the underlying purpose of a proposed project. The objectives are consistent with the issues posed for resolution by the City Council and include a range of basic project objectives. As such, the objectives are not overly broad or too narrow. The commenter's suggestion to amend the Mission Valley Community Plan instead to remove the proposed roadway connection to resolve the inconsistency with the two plans is no different from the proposed amendment to the Serra Mesa Community Plan in that it would require changes to a community plan and require City Council approval. Furthermore, this alternative was considered in Chapter 9, Alternatives, but was ultimately rejected from further consideration for reasons provided therein.

DD-232: The concerns raised in this comment are similar to those provided in comment DD-2. Please see the response to that comment.

DD-233: The commenter suggests amending the Mission Valley Plan to not include the street connection, and asks why this alternative was discounted. The commenter suggests a bicycle and pedestrian path would be more consistent with the general and community plans. The commenter suggests it is inappropriate to discount an alternative based on narrow objectives that are hiding the underlying purpose of the project. The commenter suggests the DEIR analysis of the alternatives was unreasonably limited.

The justification for rejecting the No Build/Remove from Mission Valley Community Plan Alternative is provided in Section 9.4.1.2 of the DEIR. Please see the response to comment DD-8 regarding the No Build/Remove from Mission Valley Community Plan Alternative. Additionally, the land use impacts of the No Project Alternative are adequately analyzed in Section 9.5.1.1 of the DEIR. The commenter does not provide any evidence to support the opinion that a pedestrian and bike path would be a better use of land and would be more consistent with the General Plan and Serra Mesa Community Plan. The commenter's statements that the project objectives are too narrow are similar to those provided in comment K-12. Please see the response to that comment. The City Council has not approved the project at this time and will consider whether or not the specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant environmental effects, or whether one of the alternatives to the proposed project is to be selected for approval. No changes to the FEIR are warranted as a result of this comment.

DD-234: The commenter cites the location of data from the previous Program EIR related to community access travel times. The community access travel times referenced by the commenter are provided in Table 5.2-23 of the DEIR. Please see the response to comment G-126 for a discussion of how the community access analysis was conducted.

DD-235: The commenter cites information from the previous Program EIR. Please see the response to comment G-126 regarding the community access analysis.

DD-236: The commenter suggests there would be limited additional benefit to the time travel with or without the proposed roadway. The concerns raised in this comment are similar to those provided in comments G-126 and DD-171. Please see the responses to those comments.

DD-237: This comment is in reference to the project objectives and provides the opinion of whether or not the project or the No Project Alternative would meet the various objectives.

Resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa is just one of the objectives of the proposed project. Please see Section

9.4.1.2 of the DEIR and the response to comment DD-8 for a discussion of why the No Build/Remove from Mission Valley Community Plan Alternative was rejected from further consideration. The commenter provides several opinions that circulation, traffic, safety, emergency efficiency, the General Plan, and the Bicycle Master Plan would improve without the proposed project, but does not provide any evidence to support these opinions. The environmental impacts of the proposed project are adequately addressed and disclosed in the DEIR. The commenter also does not provide any evidence to support the opinion that only one project objective would be met by the proposed project. No changes to the FEIR are warranted as a result of this comment.

DD-238: This comment suggests that under the No Project Alternative significant impacts would be reduced or avoided compared to the proposed project. The commenter suggests the No Project Alternative would meet the project goals as the Mission Valley Community grows, including improving circulation, traffic, safety, emergency efficiency, complying with the General Plan and the Bicycle Master Plan, by increasing use of alternative transportation and intercommunity connectivity.

The various concerns raised by the commenter are similar to those provided in previous comments that have already been addressed and are discussed in detail in Chapter 9, Alternatives, of the DEIR.

DD-239: This comment expresses the opinion that the summaries of impacts are not true. The commenter requests Kaplan Drive and the trail connections be included in the discussion, asks several questions pertaining to the project objectives and how the proposed project and No Project Alternative would meet them. The comment includes a table of significant impacts to roadways with and without the Franklin Ridge Road Connection. The commenter suggests the table proves the traffic congestion would be worse with the proposed project, and asks if the table will be included.

The potential environmental impacts of the proposed project are analyzed and disclosed in the DEIR, all of which are supported by substantial evidence. The analysis of potential impacts associated with the No Project Alternative are detailed in Chapter 9, Alternatives, of the DEIR. The commenter's opinion that the No Project Alternative can meet all the project objectives when including an amendment to the Mission Valley Community Plan are similar to those provided in several previous comments that have already been addressed and are all based on opinion, not

substantial evidence. Table 7-1 as referenced by the commenter does not exist in Appendix C. Regardless, the significant transportation and circulation impacts are detailed in Section 5.2, *Transportation and Circulation*, of the DEIR. The commenter's presentation of data already disclosed in the DEIR does not raise issue regarding the adequacy of the DEIR.

DD-240: This comment asks for the data that the conclusions were drawn from and requests that incorrect information and tables should be removed and Kaplan Drive should be taken into consideration.

The potential environmental impacts of the proposed project are analyzed and disclosed in the DEIR, all of which are supported by substantial evidence. The commenter does not specify which tables are incorrect or false. Please see the response to comment DD-2 regarding Kaplan Drive. Please also see the response to comment DD-21 regarding the bike path referenced by the commenter and pedestrian trail through Phyllis Place Park.

DD-241: This comment requests an explanation as to how the alternatives would result in greater environmental impacts on land use. The comment asks how the alternatives would not comply with the General Plan.

An analysis of the potential land use impacts of the alternatives is provided in Chapter 9, Alternatives, of the DEIR, along with the justification to support the impact determinations. No changes to the FEIR are warranted as a result of this comment.

DD-242: The commenter expresses the opinion that noise impacts would not be less than significant with mitigation. The commenter suggests that noise after construction of the proposed project could not be mitigated due to the increased traffic and 10% grade of the road. This comment repeats the sentiment that the project objectives would not be met by the proposed project.

The commenter's opinion that operational (traffic) noise impacts would not be less than significant with mitigation are incorrect statements. As detailed in Section 5.4, *Noise*, of the DEIR, operational (traffic) noise was analyzed at twelve noise-sensitive receptors (R1 through R12). Table 5.4-7 and Table 5.4-8 show the changes in noise levels at the various sensitive receptors analyzed as a result of operational (traffic) noise. Based on the results of the noise analysis, no significant operational noise impacts were identified. As a result, no mitigation was required. The commenter's several opinions that the proposed project would not meet the project objectives, while both alternatives would meet all the project objectives except for project objective 1 are similar to several previous comments that have been already been addressed. Furthermore, the City Council will consider the environmental impacts of the project and will weigh the benefits of the project before making a decision to approve or deny the project.

DD-243: The commenter expresses the opinion that just because the No Project Alternative would not resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan does not mean that it would have a greater environmental impact than the proposed project. The commenter expresses the opinion that it is impossible and has not been proven in the DEIR that the No Project Alternative would result in similar transportation/circulation significant impacts to the proposed project. The commenter reiterates points made in previous comments that the No Project Alternative would improve circulation, reduce traffic congestion, and allow safe travel for pedestrians and cyclists.

The DEIR adequately analyzes the potential impacts associated with the No Project Alternative. Table 9-2 in Chapter 9, Alternatives, of the DEIR provides a comparison of the impacts of the No

Project Alternative with those of the proposed project. The commenter fails to note that several roadways, intersections, and freeway ramps will continue to degrade as the Mission Valley and Serra Mesa communities grow, regardless of whether the proposed project is implemented. This is evidenced by the data presented in Section 5.2, *Transportation and Circulation*, of the DEIR under the analysis of near-term and long-term impacts, with and without the project. The commenter's several opinions related to the No Project Alternative meeting the project objectives are similar to those provided in several previous comments that have been already been addressed.

DD-244: The commenter suggests the inconsistencies between the community plans is not an environmental impact but rather words on paper that can be amended for the most environmentally friendly outcome. It is unclear what point the commenter is trying to make.

DD-245: This comment refers to Chapter 9, Alternatives, of the DEIR and suggests the DEIR is contradictory to the project objectives and the community plans. The comment quotes a mitigation measure for Murray Ridge Road from Mission Center Road to Pinecrest Avenue, and suggests this mitigation measure was not recommended and the impact would remain significant and unavoidable. The commenter suggests if all mitigation measures are conditions of the project they must go through based on the findings of the DEIR.

Section 15126.4 of the State CEQA Guidelines requires that an EIR describe feasible measures which could minimize significant adverse impacts. The implementation of mitigation measures identified to reduce significant environmental impacts is required to the extent that their implementation is feasible. The feasibility of mitigation measures are discussed in the Findings, which take into account specific economic, legal, social, technological, or other considerations that may make the mitigation measures identified in the FEIR infeasible. Therefore, all feasible mitigation measures will be requirements of the project as part of the Mitigation Monitoring and Reporting Program.

DD-246: This comment restates text from the DEIR regarding the inability to implement mitigation measures MM-TRAF-1 and MM-TRAF-9, which require the restriping of Murray Ridge Road from Mission Center Road to Pinecrest Avenue. Please see the response to comment DD-245 regarding making all feasible mitigation measures required conditions. Please also see the response to comment G-205 for a discussion of why the No Project Alternative is not the environmentally superior alternative.

DD-247: This comment questions why, if the mitigation measures are not recommended and would remain significant and unavoidable, would the DEIR recommend the proposed project as the superior alternative. The commenter also asks why the alternatives are stated as having "similar impacts" when the conditional mitigation is not recommended. The commenter questions why tables in the DEIR state the proposed project meets most project objects, and expresses the opinion that it does not.

The various concerns raised by the commenter are detailed throughout Chapter 9, Alternatives, of the DEIR. The environmentally superior alternative can only be determined for one of the alternatives to the proposed project, not the proposed project itself. As such, the commenter's allegation that the DEIR recommends the proposed project as the superior alternative is factually incorrect. Please see the response to comment DD-13 for why the project is consistent with the General Plan and community plans. No changes to the FEIR are warranted as a result of this comment.

DD-248: This comment pertains to Appendix A and asks where the answers are to questions submitted in 2012. The commenter suggests the connection at Kaplan Drive is mentioned in Appendix A and nowhere else in the DEIR. The commenter suggests issues in Appendix A are not addressed in the DEIR. The commenter suggests Caltrans wrote a letter included in Appendix A stating that traffic data should not be more than 2 years old and the traffic data is dated 2012. The commenter asks if this data will be updated.

The commenter is referring to comments issued on the Notice of Preparation (NOP). CEQA does not require responses to comments received during the NOP scoping period. However, the comments are used in the preparation of the DEIR. Moreover, please see the response to comment G-3. Please see the response to comment DD-2 regarding Kaplan Drive and the responses to comments G-61 and G-62 regarding the traffic data. No changes to the FEIR beyond those indicated in the response to comment DD-2 are warranted as a result of this comment.

DD-249: This comment pertains to Appendix C. The commenter expresses the opinion that Alternatives were not well studied and asks why the alternatives did not include mitigation measures.

The commenter provides a general opinion that the alternatives were not well studied or thought out, but does not provide any supporting evidence. The comparison of the alternatives with the proposed project analysis assumes that all applicable mitigation measures identified for project impacts would be implemented.

DD-250: This comment pertains to Appendix C and expresses the opinion that the DEIR does not analyze any connections to Mission Valley other than Mission Center Road going north. The commenter asks if other connections were studied in compliance with CEQA and lists several roadways and suggests the traffic on these roadways should be analyzed.

Please see the response to comment G-70 for a discussion of how the traffic impact study area was developed.

DD-251: This comment asks why allowing access north on either the 163 and/or the 805 was not studied as a method of relieving the currently failing freeway segments at Mesa College Drive. The commenter suggests that because vehicles exit the freeway onto neighborhood streets to turn from south to north, Mesa College Drive gets congested, and suggests this might happen to Phyllis Place, Via Alta, and Franklin Ridge Road.

The commenter does not provide any specific locations on SR-163 or I-805 for study. Additionally, none of the project objectives were aimed at alleviating freeway congestion. Moreover, both SR-163 and I-805 are outside of the project study area. Please see the response to comment G-70 for a discussion of how the traffic impact study area was developed.

DD-252: The commenter suggests there is congestion on Mission Center Road because the I-805 is operating at LOS F, not because there is a lack of access to the I-805. The commenter suggests Mission Valley and Serra Mesa communities should be connected through streets that are not in residential areas and asks why other connections are not considered. The commenter asks if the proposed project was first proposed in the Mission Valley Community Plan when the Civita development was considered, or was the roadway connection proposed through a rock quarry with no residences. Finally, the commenter asks why the community plan is not being updated to not include the road based on the new development that was not there previously.

Please see the responses to comments DD-97, DD-134, and DD-140, which address the fact that the proposed project would not generate new vehicle trips, but rather would redistribute vehicle trips onto other existing transportation infrastructure. As such, adding new points of freeway access would not increase congestion on the freeway, but simply allow more direct access. The City Council Resolution directed staff to consider the benefits (if present) that would occur with a road connection from Franklin Ridge Road to Phyllis Place. As such, other roadway connections were not considered for this specific project. Please also see the response to comment DD-13 regarding the consideration of the proposed roadway connection in the Mission Valley Community Plan.

DD-253: The comment reiterates the statement from comment DD-251 that the 805 is already operating at a low LOS, and the problem will not be solved by the proposed project. The commenter suggests the proposed project would add a net of 21,334 cars to the road and would trap the Abbots Hill community from exiting and receiving emergency services. The commenter questions how adding more vehicles to the 805 would reduce congestion. The commenter questions the impacts to community character and walkability and provides quotes from promotional material for Civita which encourages walking. The commenter expresses the opinion that walking will be affected by the 35,000 cars traveling through the community.

Please see the responses to comments DD-97, DD-134, and DD-140, which address the fact that the proposed project would not generate new vehicle trips, but rather would redistribute vehicle trips onto other existing transportation infrastructure. Although there would be some roads and intersections in the vicinity that would experience more delay than with the project, other intersections and roadways would see a decrease in delays. Much of this additional delay with the project would be from the traffic generated by the future development of the Civita development itself, which not only includes up to 4,780 residential units, but over 1,200,000 square feet of office/business park, commercial, and retail. Please see the response to comment R-1 regarding community character.

DD-254: This comment provides promotional marketing information for the Civita development related to community character, walkability, and safety. Please see the response to comment R-1 regarding community character.

DD-255: This comment suggests the objectives are not clear enough to develop alternatives because the main objective does not disclose the underlying purpose of the proposed project. The commenter suggests if the actual underlying purpose of the roadway connection was included as an objective, other alternatives would have been studied and more reasonable alternatives would have been found.

Please see the responses to comments K-12, DD-231, G-14, and G-16.

DD-256: This comment suggests that project objective 1 is too narrow and this is the only reason the alternatives were not superior to the proposed project. Please see the responses to comments K-12, DD-231, G-14, and G-16.

DD-257: This comment expresses an opinion that the alternatives would substantially lessen the impacts although the commenter states that the DEIR does not state the truth or back up the conclusions with facts.

The alternatives analysis is provided in Chapter 9 of the DEIR and contains all the required components pursuant to CEQA. Moreover, the comment, while expressing an opinion of the analysis,

does not provide any specific issues to which the City may respond and provides no evidence to support the statements.

DD-258: This comment refers to a court case and suggests reducing development would be a reasonable alternative even if it is inconsistent with the General Plan.

The commenter is misinterpreting the court case cited. The court case referred to a “Reduced Development Alternative” as a development alternative to the proposed project, not as a completely separate effort without any connection to the proposed project. Suggesting to reduce development in Mission Valley is well beyond the proposed roadway connection project. A similar comparison to a “Reduced Development Alternative” as referenced by the case would be Alternative #2, Bicycle, Pedestrian, and Emergency Access Only Alternative.

DD-259: This comment quotes text from the CEQA Guidelines related to CEQA Findings. The commenter suggests the mitigation measures do not avoid significant environmental impacts, therefore, the agency may not approve the proposed project under the basic requirements of CEQA.

CEQA requires the Lead Agency to make findings for each significant impact, which includes one or more of the three options listed by the commenter. However, the lead agency may approve a project in spite of the environmental impacts by adopting the Statement of Overriding Considerations, which considers the benefits in relationship to the environmental impacts, as well as adoption of the Findings, Mitigation Monitoring and Reporting Program, and certification of the FEIR.

DD-260: This comment refers to the CEQA Guidelines and expresses the opinion that the statement of overriding considerations are not clear nor convincing.

The commenter provides an opinion of the Statement of Overriding Considerations, but does not provide any evidence to support the opinion, nor does the commenter indicate specifically what is unconvincing or unclear. No revisions are necessary.

DD-261: This comment refers to the CEQA Guidelines and asks for the support of substantial evidence in the record for the DEIR. The DEIR and its appendices provide substantial evidence for all of the environmental determinations listed therein. Because the comment is a general comment, a general response is appropriate. Please see the response to F-2.

DD-262: This comment refers to CEQA case law pertaining to economic infeasibility. The commenter asks if the proposed project is economically feasible when the underlying environmental purpose for a project is considered. Please see the responses to comments DD-162, DD-184, and DD-197.

DD-263: This comment asks why Mission Village Drive was not considered as a connection between the two communities. The commenter asks why the proposed project did not acknowledge the existing connection between Mission Valley and Serra Mesa through Mission Village Drive.

Mission Village Drive is approximately 1.5 miles east of the proposed roadway connection. The proposed project would provide an additional connection between the Serra Mesa and Mission Valley communities. Additionally, please see the project objectives identified in Chapter 3, *Project Description*, of the DEIR. These project objectives include, among others, improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. The proposed project would improve local mobility within the Serra Mesa and Mission Valley planning areas as it would provide a direct roadway connection from the southwestern portion of Serra Mesa to the

Quarry Falls site for motorists, cyclists, and pedestrians. No changes to the FEIR are warranted as a result of this comment.

DD-264: This comment asks why amending the Mission Valley Community Plan was only mentioned as an alternative and not investigated as is required. The commenter asks if the amendment was investigated, why it was not considered the superior alternative.

Please see the response to comment DD-12.

DD-265: The commenter asks how a 43 minute delay at 805 and a 54.6 minute delay with mitigation on Franklin Ridge Road would make the proposed connection have a similar impact to the no road connection alternative.

Please see the response to comment G-81 regarding the 43-minute delay referenced by the commenter. It is unclear what the commenter is referring to when stating that there would be a 54.6 minute delay with mitigation on Franklin Ridge Road. The traffic study did not find any delays of 54.6 minutes as a result of the proposed project; however, the Via Alta & Franklin Ridge Road intersection is expected to have a 54.6 *second* delay in 2035 with the proposed project with mitigation as reflected in Table 5.2-21 of the DEIR. As demonstrated in Section 5.2, *Transportation and Circulation*, of the DEIR, several roadway segments would experience a net decrease in the volume to capacity ratio, while several intersections would experience a net increase in delay with implementation of the project. Although some roadways and intersections would become more congested with the proposed roadway, the redistribution of traffic that would result from the proposed roadway connection would improve conditions at various other roadway facilities within the traffic study area in terms of level of service, delay, and volume to capacity ratio. Please note that all roadways, intersections, freeways, and freeway on-ramps would experience increased congestion under long-term (year 2035) conditions compared to near-term (year 2017) conditions due to buildout of the Mission Valley and Serra Mesa Community Plans. No changes to the FEIR are warranted as a result of this comment.

DD-266: The comment asks why there is not a bigger benefit to taking cars off of the road for pedestrians and bikes with a traffic-free trail.

This comment is a general question about the benefits of pedestrian and bicycling only facilities compared to multi-modal facilities. It does not address the adequacy of the DEIR or raise a specific issue about the project objectives. No changes to the FEIR are warranted as a result of this comment.

DD-267: The comment asks how adding vehicular traffic to the approved bike and pedestrian path through the park on Phyllis Place is an improvement for the Bicycle Master Plan.

The proposed project includes bicycle and pedestrian paths as well as a roadway connection. The proposed roadway connection would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and the Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. No changes to the FEIR are warranted as a result of this comment. The comment implies there is an approved bicycle path; however, there is not. Under the No Project Alternative there would only be a pedestrian trail as described in the Quarry Falls Specific Plan.

DD-268: The comment asks why improving the mass transit system was not studied as an alternative to the road connection.

Please see the response to comment DD-134 in regards to why increasing mass transit was not considered as a project alternative.

DD-269: The comment asks if the four-lane connector road has a center emergency lane.

As discussed on Chapter 3, *Project Description*, of the DEIR, the proposed project is a 460-foot long four-lane major street, within an approximately 120-foot right-of-way. The roadway would not contain a “center emergency lane.”

DD-270: The comment asks why, if the proposed project has been denied twice, we are wasting taxpayer dollars on something that the community does not support. The commenter asks how much the proposed project and proposed mitigation measures cost the city taxpayer.

The commenter’s questions regarding the costs of the mitigation measures is an economic issue that is not under the domain of CEQA unless it is attributed to a specific physical impact on the environment or the feasibility of a mitigation measure. Please see the response to comment DD-114 for the party responsible for payment and/or implementation of mitigation. The comment raises an economic issue unrelated to the adequacy of the environmental analysis provided within the DEIR or the feasibility of mitigation.

DD-271: The comment asks why the entrance and exit ramps to 163, 15, and 8 have not been studied and improved to alleviate traffic congestion in Mission Valley. All freeway ramps cited by the commenter are outside of the project study area because traffic volumes associated with the proposed project would not meet the minimum volumes required by the City’s Traffic Impact Study Manual. No impacts to these ramps would occur from the proposed project.

DD-272: This comment asks if I-805 operates at LOS F, how more entrances to the freeway would alleviate traffic congestion.

The proposed roadway connection would improve local navigational efficiency to and from freeway on- and off-ramps for the surrounding areas. No new trips would be added by the proposed roadway connection. Please see the response to comment DD-140 for a discussion of how the project would redistribute vehicle trips, rather than generate new trips. All potential transportation and circulation impacts of the proposed project are analyzed and disclosed in Section 5.2, *Transportation and Circulation*, of the DEIR, which are based on the results of the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates.

DD-273: This comment asks why increasing lanes on the I-805 was studied as an alternative.

Increasing lanes on the I-805 was not considered as an alternative.

DD-274: This comment asks how the proposed project would increase emergency access if there is currently no traffic and emergency access between communities.

Having a greater number of emergency access points and routes would improve emergency response in an area. As confirmed with the San Diego Fire-Rescue Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times. Moreover, as shown in Table 5.2-23 of the DEIR, drive times to hospitals and fire stations would improve compared to conditions without the project. No revisions to the FEIR are warranted as a result of this comment. Please see Section 5.2, *Transportation and Circulation*, of the DEIR for further discussion of emergency access.

DD-275: This comment asks what the impacts on the roads in Mission Valley would be if the connection is not approved.

Near-term and Long-term conditions without the proposed project are discussed in Section 5.2, *Transportation and Circulation*, of the DEIR, which is summarized from the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates in 2017.

DD-276: This comment asks why improvements to Ruffin Road are not being considered as an alternative when they have been in the General Plan for decades.

Ruffin Road is approximately 2.16 miles northeast of the proposed roadway connection. The proposed project would provide an additional connection between the Serra Mesa and Mission Valley communities. Additionally, please see the project objectives identified in Chapter 3, *Project Description*, of the DEIR. These project objectives include, among others, improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas. The proposed project would improve local mobility within the Serra Mesa and Mission Valley planning areas as it would provide a direct roadway connection from the southwestern portion of Serra Mesa to the Quarry Falls site for motorists, cyclists, and pedestrians. No changes to the FEIR are warranted as a result of this comment.

DD-277: This comment asks why the use or improvement of the mass transit system is not considered as an alternative when Mission Valley density was approved because of proximity to transit.

This comment is similar to comment DD-134; please see the response to that comment.

DD-278: The comment suggests Civita was built as a walkable area, and asks how more traffic would affect the community characteristics.

Please see the response to comment R-1. No changes to the FEIR are warranted as a result of this comment.

DD-279: The comment questions how long it would take Abbots Hill residents to receive emergency services during times when both exits are congested with traffic.

The inclusion of a roadway would increase access options for those in the Abbots Hill neighborhood. As detailed in Section 7.4 of the DEIR, the proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan, and would increase emergency access opportunities in the vicinity. As confirmed with the San Diego Fire-Rescue Department and the San Diego Police Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times and, as indicated in Table 5.2-23 of the DEIR, driving times to hospitals and fire stations would be reduced with the project. Regarding emergency access during congested traffic conditions, vehicles are required to pull to the right side of the road when an emergency vehicle approaches. No changes to the FEIR are warranted as a result of this comment.

DD-280: The comment requests further explanation of the Community Access Travel Times Table and suggests the numbers are very high.

Please see the response to comment G-126. The commenter does not identify any specific questions concerning the calculations in Table 5.2-23 of the DEIR. A detailed description of the methods used to determine the figures in Table 5.2-23 is included in Section 5.2, *Transportation and Circulation*, as

well as Appendix C, Traffic Impact Study. No changes to the FEIR are warranted as a result of this comment.

DD-281: The comment asks why traffic delays were not calculated.

The commenter does not identify specific traffic road delays or times of day for such delays. Please see Section 5.2, *Transportation and Circulation*, of the DEIR, as well as Appendix C, Traffic Impact Study for a full analysis and discussion of traffic delays. No changes to the FEIR are warranted as a result of this comment.

DD-282: The comment suggests Birdland has more than 3 entrances and exits and results in traffic congestion every day, and the commenter asks how this would be different than the proposed project.

The commenter provides anecdotal evidence with the intent to prove more access points do not reduce traffic congestion. However, there are a multitude of factors that determine whether or not an area will experience congestion. Merely having more than 1 access point in and out of an area does not result in greater traffic congestion. This comment does not raise an issue regarding the adequacy of the DEIR.

DD-283: The comment asks if the proposed school on Via Alta was considered in the DEIR. This comment is similar to comment F-4; please see the response to that comment.

DD-284: The commenter asks why an amendment to the Mission Valley Community Plan is not being studied because it is conflicting with itself. This comment is similar to comment DD-12; please see the response to that comment.

DD-285: This comment suggests there is not a reasonable range of alternatives. The commenter asks why the project does not use the unnamed road on the east side of I-805. The commenter asks why access to the I-805 when entering I8 at Qualcomm and Texas Street is not considered. This comment is similar to comment DD-83; please see the response to that comment.

DD-286: This comment asks if making Civita a gated community was considered.

The Civita project was designed and approved as the Quarry Falls Specific Plan project in 2008. The proposed project, while it would serve the Civita development (along with other Mission Valley and Serra Mesa developments), is separate from the Civita development. As such, gating the Civita community was never considered for the proposed project.

DD-287: This comment asks if a smaller access road was considered instead of a 4-lane major road. The roadway design is based on the traffic conditions, both existing and forecasted, in the project area, including having two-lane Major Arterial roadways joining up at the Franklin Ridge Road and Via Alta intersection. Please see the response to comment DD-95.

DD-288: This comment suggests the dog park in Civita at the intersection of Franklin Ridge Road and Via Alta was not mentioned. The commenter asks why this was not considered and if it would be considered a sensitive receptor. The commenter wonders if it will safe for people to cross the street with no crosswalks to get to the dog park.

Signalized pedestrian crossings would be located at the intersection of Phyllis Place and the proposed roadway connection and the intersection of Via Alta/Franklin Ridge Road and the

proposed road way connection. Please see the responses to comments G-129 and G-130 for a discussion of how air quality analysis was conducted in the vicinity of the parks.

DD-289: The comment asks why the City View Retirement Apartments on Phyllis Place were not considered sensitive receptors, and why they were not included in the study. Please see the responses to comments G-20, G-129, and G-130 for a discussion of how air quality analysis was conducted in the vicinity of the parks. As indicated in the DEIR, no significant air quality impacts would occur. Additionally, please see the response to comment DD-224 for a discussion of sensitive receptors in relation to the noise. No changes to the FEIR are warranted as a result of this comment.

DD-290: The comment asks why the letters written in 2012 are included in the DEIR but the letters written in 2016 are not. As indicated within the opening pages of the DEIR (i.e., cover pages), pursuant to CEQA, the DEIR was recirculated in its entirety and, as such, does not need to address comments on a previous version of the DEIR. However, the letters received in 2012 were in regards to the Notice of Preparation. Please see the responses to Letter K, and specifically the response to comment K-9.

DD-291: This comment suggests the tables say “without connection” but it should say “with connection” as it does in the table. The comment does not refer to a specific table; as such, it is unknown where the commenter is suggesting the changes are needed.

DD-292: The comment suggests there is incorrect labeling on the tables and suggests delays need to be labeled in (min) and not left blank or in seconds. The comment refers only to one table: 5.2-5.

Table 5.2-5 of the DEIR shows existing peak-hour conditions at intersections. The table correctly indicates delay in seconds, not minutes. No other tables appear to be mislabeled. No changes are required to the FEIR.

DD-293: The comment suggests the DEIR table titles that contain “with” and “without” only show “existing” and “with,” but not “without.” The comment does not refer to a specific table.

Without additional location information, the City is unable to locate the table that needs any correction as suggested by the commenter. As such, no changes have been made to the FEIR.

DD-294: The comment suggests the chart of response times is not clear on where the information came from, and suggests the information seems impossible.

Without additional location information, the City is unable to locate the chart in reference. As such, no changes have been made to the FEIR.

From: [Ron Yardley](#)
To: [PLN PlanningCEQA](#)
Subject: Letter Addressing Serra Mesa Community Plan Amendment Street Connection, Project No. 265605; SCH No. 2012011048
Date: Wednesday, May 31, 2017 3:35:52 PM
Attachments: [PEIR Opposition Letter to Planning Commission 5-31-17.docx](#)

Attached, please find my letter addressing the DPEIR:

> **Project Name: Serra Mesa Community Plan Amendment Street Connection**
> **Project No. 265605;** SCH No. [2012011048](#)

DE-1

Thank you

DATE: May 31, 2017

TO: PlanningCEQA@sandiego.gov

SUBJECT: REJECT Serra Mesa Community Plan Amendment Roadway Connection

□ **Project Name: Serra Mesa Community Plan Amendment Street Connection**

□ **Project No. 265605**; SCH No. 2012011048

DE-2

I am a resident of Mission Valley's CIVITA planned community and live in the Lucent development located on Via Alta, which is one of two residential streets proposed to be a main link between parts of Mission Valley and the "connector road" leading to/from I-805.

I have reviewed the PEIR and see significant technical flaws in it including:

DE-3

1. **Why didn't the EIR factor in there was already a workable and very sufficient Connector Road in existence that connected I-805 and Friars Road, and that a second road would be redundant and not necessary?** The existing connector road between I-805 and Friars Road is easily accessed via the Murray Ridge/Phyllis Place freeway entrance/exit. After a short distance of travel along Murray Ridge Road, motorists can easily connect to Mission Center Road, a three- and four-lane, 45-mph road that travels down a natural canyon and provides for commuters needs traveling between I-805 and Friars Road.

DE-4

2. The Draft EIR classifies Via Alta and Franklin Ridge Road, North of Civita Blvd, as 2-lane collectors with a traffic volume LOS threshold equivalent to a 2-lane collector (continuous left-turn lane). However, and in fact, each of these roadway segments are 2-lane roadways with a divided median and multi-family residential zoning continuously on either side.

- a. **Why are Via Alta and Franklin Ridge Road roadway segments, north of Civita Blvd., classified for purposes of the EIR as 2-lane collectors (continuous left-turn lane) versus 2-lane collectors (multi-family) which more appropriately fit their physical built character?**
- b. **When left-hand turn traffic on Via Alta and Franklin Ridge Road roadway segments encounter the high volume of long-term traffic predicted, will the median turn pockets provide adequate queuing capacity? If the left-hand turn pockets back-up beyond their design capacity, what is the additional impact to the LOS of these roadway segments?**

DE-5

3. **Why didn't the Draft EIR address the impact of increased traffic and pedestrian safety for the future school site planned at the northeast corner of Civita Boulevard and Via Alta?**

DE-6

4. Via Alta and Franklin Ridge Road segments will have limited pedestrian crossings with significant distance between crossings on extremely steep hills. There is a 0.4-mile lineal distance along Via Alta between pedestrian crossings at Civita Blvd and Franklin Ridge Road. There is a 0.5-mile lineal distance along Franklin Ridge between street crossings at Civita Blvd and Via Alta. Continuous

and heavy long-term traffic projections show Via Alta and Franklin Ridge operating at a LOS (level of service) C and LOS F, respectively. Heavy and continuous traffic will present pedestrian danger.

- | | |
|---------------|--|
| DE-6
cont. | <ul style="list-style-type: none"> ○ a. Did the Draft EIR review the projected volume of pedestrian traffic within the walkable community of Civita? ○ b. Did the Draft EIR review pedestrian crossings on Via Alta and Franklin Ridge Road? ○ c. Did the Draft EIR review the distance between accessible pedestrian crossings on Via Alta and Franklin Ridge Road? ○ d. Did the Draft EIR address the safety of pedestrian crossings for access to Civita Park, Civita's recreational facility, Civita's Bark Park, and Civita's proposed grade school? ○ e. How does the Draft EIR address pedestrian safety within the walkable community of Civita? |
| DE-7 | <ul style="list-style-type: none"> ○ f. Did the Draft EIR address ADA requirements and corresponding difficulty for handicapped and/or mobility-challenged of trying to safely traverse what-would-become heavily-trafficked streets, as well as accessing limited cross-walks, particularly those living at the mid-point on the west side of Via Alta and the east side of Franklin Ridge? How are they supposed to make their way up steep hills in order to avoid breaking the law by J-walking to all the trails that lead to and connect with the Civita Park and Community Center? |
| DE-8 | <p>5. The Draft EIR states the connector road will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities.</p> <ul style="list-style-type: none"> ○ a. Why would the Draft EIR argue that traffic needs to be diverted from Mission Center Road, a four-lane, largely non-populated, canyon frontage road containing, at the base of the street, only one small, set-back group of residences separated by a significant number of trees and shrubbery? ○ b. Why would the Draft EIR suggest that traffic should be diverted through Civita, a master planned walkable community with wholly residential streets, a park, a planned school, and dense residential complexes all, of which, closely abut against the street with very little or no setback? |
| DE-9 | <ul style="list-style-type: none"> ○ Why would the Draft EIR maintain that allowing 34,000 vehicles to pass up and down two residential streets would not be horribly disruptive to a residential community? ○ Why would the Draft EIR triumph a planned road that will be at odds with the Mayor's City of Villages concept/goal to be constructed? |
| DE-10 | <p>6. The Mission Valley Community Plan Update is currently in progress. The Mission Valley Community Plan Update will include a comprehensive Mission Valley mobility plan, including: ▪ Potential new public transit corridors to reduce vehicles; ▪ Potential new Riverwalk trolley station and relocated trolley station at Mission; ▪</p> |

DE-10 cont.	<p>Valley Center to increase ridership; ▪ Potential new skyways to UCSD and University Heights; ▪ Planned and potential new walking multi-use paths; ▪ Planned and potential new cycling paths; ▪ Recommendations for roadway and connectivity improvements; ▪ Recommendations for new freeway interchanges and improvements. Why, then, is the City advancing the Serra Mesa Community Plan Amendment Street Connection DRAFT EIR ahead of the Mission Valley Community Plan Update which should serve as the Community’s guide to the future development of Mission Valley?</p>
DE-11	<p>7. The Mission Valley Community Plan states, “Streets serving new development should be connected to the road network, and not to major streets serving residential areas on the mesa.” The proposed connector roadway introduces new streets connecting through residential neighborhoods located on the hillsides of Mission Valley and the mesa of Serra Mesa. Why does the DRAFT EIR not address this statement within the Mission Valley Community Plan and the impacts to residential neighborhoods on Mission Valley hillsides and at the ridge of the Serra Mesa?</p>
DE-12	<p>8. Additional comments as to why the Serra Mesa Community Plan Amendment Street Connection will undermine the City’s vision for Civita as San Diego’s next walkable village:</p> <ul style="list-style-type: none"> ▪ The connector proposal encourages ~34,000 ADT of regional traffic through Civita’s residential district; ▪ Via Alta and Franklin Ridge Road, North of Civita Blvd, are residential neighborhood streets – regional freeway traffic should not be encouraged by design to trespass through residential neighborhoods; ▪ High traffic streets adjacent to residential has been shown to diminish quality of life; ▪ High traffic streets adjacent to residential has been shown to diminish property values; ▪ Impacts safe access to Civita Park; ▪ Impacts safe access to Civita’s future grade school; ▪ Impacts safe access to Civita’s future community center and dog park; ▪ Easy vehicular ingress/ egress in multiple directions increases crime rates; ▪ Proposed regional traffic impacts residential neighborhoods; ▪ Proposed regional traffic negatively impacts property values; ▪ Proposed regional traffic impacts tranquility, peace and quiet; ▪ Proposed regional traffic impacts nature, air quality and biology; ▪ The Civita community was intended to be a pedestrian friendly, family-oriented, smart-growth, mixed-use community with access to transit. A freeway connector through this community’s residential neighborhoods undermines the very vision of the community as a Smart Growth village focused on walkability and limited vehicle trips. ▪ Via Alta, one of the proposed main routes to/from I-805 via Phyllis Place, is a wholly residential, narrow, two-lane road with bike paths on both sides, further narrowing the road. This street will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It is currently used primarily for walking, cycling, dog-walking, and getting to/from our homes. It will become unsafe for anything but vehicular traffic. ▪ Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and

DE-12 cont.	<p>disruption. It will no longer be a walkable community. ▪ Via Alta (and eventually Franklin Ridge Road) will become dangerous, congested, polluted, noisy thoroughfares. ▪ Why hasn't the Draft EIR proposed better solutions? The so-called connector road was initially placed into a 30-yearold plan when Civita was nothing more than a rock quarry and it made sense then. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a school, community events and concerts....in short, everything the City of San Diego should be encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? ... perhaps cutting one or two minutes from someone's commute (which is debatable).</p>
DE-13	<p>9. How was the additional significant burden of traffic on Via Alta and Franklin Ridge Road addressed in the conclusion of the project recommendation?</p>
DE-14	<p>10. Did the PEIR address the impact of increased traffic and pedestrian safety issues resulting from the street connection on a future school site planned at the northeast corner of Civita Boulevard and Via Alta? If not, why not?</p>
DE-15	<p>11. Did the PEIR consider the existing emergency access point created within the Civita development at Kaplan Drive? If not, why not?</p>
DE-16	<p>12. Did the PEIR address what could be truck traffic that may try to access the road as a short-cut to a backed-up, congested I-805 So. during rush hour traffic?</p>
DE-17	<p>13. Why didn't the PEIR develop additional alternative solutions? The current alternative of "No project" is this community's preference. Its second preference would be "connecting communities with only bicycle paths and an emergency services road" (which already is currently available from Kaplan Dr.). Why didn't the PEIR also look at the following as alternatives:</p> <ul style="list-style-type: none"> ○ Expanding Mission Center Road to four lanes at its most northern-point; ○ Adding a connector directly from I-805 to Friars Road or Qualcomm Way. ○ Developing an existing fire lane located east of Civita/I-805 into a connector road into Mission Valley.
DE-18	<p>Because of the numerous and significant flaws in the PEIR, I, and virtually all of my Civita neighbors, AM STRONGLY OPPOSED to the approval of this Connector Road.</p>
DE-19	<p><u>In Summary:</u></p> <p>The Civita community was intended to be a self-contained, pedestrian friendly, family-oriented, smart-growth, new residential community and that is why we purchased here at Lucent. The connector road will destroy our community. Via Alta and Franklin Ridge Road, which are the two proposed main routes to/from I-805 via Phyllis Place, are wholly residential, narrow, two-lane roads (with bike paths on both sides, further narrowing the road) which will purportedly feed into/out of a four-lane, major connecting road that will funnel non-stop traffic through our neighborhood to/from I-805. It will become unsafe for anything but vehicular traffic. The PEIR states the connector road</p>

DE-19
cont.

will "relieve" traffic from Mission Center Road and would provide a convenient surface-road link from Mission Valley and Civita to Serra Mesa, and could help relieve traffic on Mission Center Road that connects the two communities. Why would the PEIR argue that diverting traffic from a largely commercial Mission Center Road that contains only one set-back residential complex and generally follows a non-populated canyon at its northern-most end to and through wholly residential streets which currently have a park, a planned school, and ten residential complexes (Lucent I and II, Apex, Frame & Focus, Altana, Origen, Versa, Circa 37, West Park, and Aquatera, with a many more being planned), all, of which, closely abut against the street with very little or no setback? Instead of a cohesive community, this road connector will virtually slash Civita into three separate parts dominated by significant traffic, safety, congestion, noise, pollution, and disruption.

The so-called connector road was initially placed into a 30-year-old plan, and currently outdated, when Civita was nothing more than a rock quarry. However, the quarry is now developing into a vibrant, planned, residential community with lovely parks, walking trails, a community center, a planned school, and community events and concerts....in short, everything the City of San Diego is encouraging and supporting instead of destroying, which is exactly what approving the Connector Road would do. It would gut this community for the sake of what? With the Connector Road, CIVITA will become nothing more than a splintered, GPS-shortcut/pass-through community.

DE-20

This is not what the developers intended their legacy project to be. Nor was it what all the residents bought into. Nor is it what City Leaders maintain they want from their communities. We bought into a City of Villages, a safe, secure, walkable community, not one where neighbors are cut off from each other by regional traffic continuously pouring into a residential neighborhood.

CIVITA OWNERS WANT TO PROTECT THE CHARACTER OF OUR COMMUNITY,
WHEREAS THIS HORRIBLE CONNECTOR ROAD PLAN WILL EFFECTIVELY
DESTROY IT.

DO NOT APPROVE THE CONNECTOR ROAD!

Sincerely,

Ron Yardley
8389 Distinctive Dr.
San Diego, CA 92108

Letter DE: Ron Yardley

DE-1: The commenter provides an introductory statement regarding submittal of comments for the project.

This comment is an introductory statement and does not raise any specific issues requiring a response pursuant to CEQA. Specific responses to the commenter's specific comments are addressed in comments DE-2 through DE-20 below.

DE-2: The commenter is a Civita resident that has reviewed the DEIR and expresses the opinion that there are significant technical flaws, which follow in specific comments.

This comment does not identify which specific alleged significant technical flaws the commenter is referring to in this comment. Please see the response to comment F-2.

DE-3: The commenter questions why the EIR did not consider the existing connector road that connects I-805 and Friars Road, and expresses the opinion that a second road would be redundant and unnecessary. The commenter identifies the existing connection between I-805 and Friars Road via Murray Ridge Road to Mission Center Road.

Please see the response to comment DC-3. The City acknowledges that an existing linkage between the Serra Mesa and Mission Valley communities currently exists via Mission Center Road and Murray Ridge Road. However, in 2008, as a result of the approval of the Quarry Falls project in Mission Valley, City Council initiated a plan amendment (City Council R-304297) directing staff to amend the 1977 Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road which is identified in the 1985 Mission Valley Community Plan.

Project objective #1 of the DEIR is to "resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa." The proposed project meets the intent of the City Council resolution and project objectives. The proposed roadway connection would add an additional access point, inherently providing better emergency evacuation routing. Specifically, the road connection would provide a third point of evacuation for residents in Civita where two currently exist, and a second point of evacuation for the 200 or so homes at the western end of Phyllis Place in the Abbotshill neighborhood where only one currently exists.

DE-4: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-3; please see the response to that comment.

DE-5: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-4; please see the response to that comment.

DE-6: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-5; please see the response to that comment.

DE-7: The commenter asks if the DEIR addressed ADA requirements and potential safety hazards on handicapped and/or mobility challenged individuals trying to cross streets as a result of additional traffic.

Please see the responses to comments F-4 and F-5 regarding pedestrian safety and pedestrian crossings.

DE-8: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-6; please see the response to that comment.

DE-9: The commenter questions why the DEIR maintains that allowing 34,000 vehicles down two residential streets would not be disruptive to a residential community, and expresses the opinion that the project is at odds with the Mayor's City of Villages concept/goal.

The Civita development is not solely a residential neighborhood. Rather, Civita is proposed to include development of up to 4,500 dwelling units and 1.2 million square feet of retail and office space, all of which will itself generate a substantial amount of traffic that has been identified in the DEIR in the future years, and is discussed within the Quarry Falls PEIR. With the connection, traffic coming to and from Civita would have additional local and regional access options. Additionally, the City disagrees with the commenter's opinion that the proposed roadway would be at odds with the City of Villages concept/goal. As detailed in the City of San Diego General Plan (2008), the City of Villages strategy focuses growth into mixed-use activity centers that are pedestrian-friendly districts linked to an improved regional transit system. Implementation of the City of Villages growth strategy is dependent upon close coordination of land use and transportation planning. Villages should increase personal transportation choices and minimize transportation impacts through design that pays attention to the needs of people traveling by foot, bicycle, and transit, as well as automobile. The proposed project would provide for a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, where none currently exists. This connection would allow for greater transportation options for pedestrians, bicyclists, and vehicles, as encouraged by the City of Villages strategy. In addition, the project would complete the pedestrian and bicycle network northward to Phyllis Place, which would provide a connection for pedestrians and cyclists to travel southward to access the Rio Vista and Mission Valley Center trolley stations. Moreover, the proposed project would implement the planned Class II Bike Lane facility that is included within the City's Bicycle Master Plan. No changes to the FEIR are warranted as a result of this comment.

DE-10: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comments F-7 and F-8; please see the responses to those comments.

DE-11: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-9; please see the response to that comment.

DE-12: The commenter repeats comments verbatim from those provided in Save Civita, which are included as Letter F.

This comment is identical to comment F-10; please see the response to that comment.

DE-13: The commenter questions how the additional significant burden of traffic on Via Alta and Franklin Ridge Road was addressed in the conclusion of the project recommendation.

Please refer to Section 5.2, *Transportation and Circulation*, of the DEIR. Via Alta and Franklin Ridge Road were both analyzed to determine the potential impacts of the proposed roadway connection, all of which are disclosed in the DEIR. The purpose of an EIR is to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects. The City Council has not approved the project at this time and will consider whether or not the specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant environmental effects.

DE-14: The commenter questions if the DEIR addressed the impact of increased traffic and pedestrian safety for the future school site.

This comment is similar to comment F-4; please see the response to that comment.

DE-15: The commenter questions if the DEIR considered the existing emergency access point created within the Civita development at Kaplan Drive.

Please see the response to comment G-18. The FEIR has been clarified to indicate that Kaplan Drive currently provides emergency access and bicycle and pedestrian access (see Section 5.2). The addition of this clarifying information does not affect the conclusions reached within the DEIR.

DE-16: The commenter questions if the DEIR addressed truck traffic that may access the proposed roadway connection as a short-cut to I-805 southbound during rush hour traffic.

The comment is unclear as to what truck traffic the commenter is referring to. However, both the 2015 Traffic Impact Study prepared by KOA and the Technical Report prepared by Chen Ryan and Associates were both prepared in accordance with the SANTEC/ITE Guidelines for Preparing Traffic Impact Studies and the City of San Diego Traffic Impact Study Manual. No changes to the FEIR are warranted as a result of this comment.

DE-17: The commenter questions why the DEIR did not develop additional alternative solutions, mentions the “No Project Alternative” as the community’s first preference and the “Bicycle, Pedestrian, and Emergency Access Only Alternative” as their second preference, and provides three alternative recommendations.

The overarching goal of the proposed project is to provide multi-modal connectivity between the Mission Valley and Serra Mesa communities. The three alternatives recommended by the commenter do not achieve the basic project objectives of the proposed project. As detailed in Section 3.1 of the DEIR, there are several objectives of the proposed project, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing safe and efficient multi-modal mobility. Accordingly, the three alternatives recommended by the commenter would not meet any of the project objectives detailed in Chapter 3.0, Project Description, of the DEIR. No revisions to the FEIR are warranted as a result of this comment.

DE-18: The commenter expresses the opinion that there are numerous and significant flaws in the DEIR and community opposition to the proposed roadway connection.

Please see the response to Comment F-2. This comment expresses opposition to the proposed project but does not address the adequacy of the DEIR. This comment does not raise any specific environmental issues.

DE-19: The commenter summarizes reasons for purchasing a home in the Civita community and expresses the opinion that the proposed roadway will destroy the community. The commenter restates comments from Save Civita, which are included as Letter F.

Please see the responses to comments F-2, F-6, and F-10. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

DE-20: The commenter expresses several opinions, including that the proposed roadway is not what the developers intended, not what the resident bought into, and not what City leaders maintain they want from their communities. The commenter provides the residents' reasoning for buying into a City of Villages, safe, secure, and walkable community. The commenter expresses the opinion that Civita owners want to protect community character and that the proposed roadway connection will destroy the community.

Please see the response to comment F-2. This comment expresses opposition to the proposed project but does not address the adequacy of the DEIR. This comment does not raise any specific environmental issues. .

From: [Tan, Arnold](#)
To: [PLN PlanningCEQA](#)
Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No.265605 SCH No.2012011048
Date: Wednesday, May 31, 2017 2:06:39 PM

To whom it may concern:

I'm a resident of Civita for over two years now. I know the benefits and disadvantages of living in Mission Valley. Having the 805 connector will be a huge disadvantage to our community. Why do we even need the 805 connection from Via Alta? Isn't the Mission Center Road enough? I pass this Mission Center road every day and it hardly gets backed up. So if this road is underutilized, why is there a need to create the 805 connector? It only takes 3 minutes from Via Alta to get to the 805 using Mission Center road.

If there are plans to open a school in Civita, what does your road studies show?

Also, are you planning to build more parking areas?

Arnold Tan



ITS-SAP | F&A

Mobile: 858-753-3144

DF-1

Letter DF: Arnold Tan

DF-1: The commenter provides some personal history and expresses opposition to the proposed roadway connection, expresses the opinion that Mission Center Road is sufficient as an I-805 connector, and questions road studies for the planned school in Civita. The commenter asks if more parking areas are planned.

This comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR. Alternative options to the proposed roadway connection for providing a connection between the Serra Mesa and Mission Valley communities were not considered because they would not meet a majority of the project objectives, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, and improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.

Please see the response to comment F-4 regarding pedestrian safety for the potential future school at Via Alta and Civita Boulevard.

The proposed project consists of construction and operation of a four-lane major street, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley; however, on-street parking is not planned for the road right-of-way. No additional parking areas are included as part of the proposed project, nor would the project remove any existing on-street parking.

No changes to the FEIR are required as a result of this comment. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

From: [Perez, Carlo](#)
To: [PLN_PlanningCEQA](#)
Subject: Subject: Reject Serra Mesa Community Plan Amendment Roadway Connection Project No. 265605 SCH No. 2012011048
Date: Wednesday, May 31, 2017 1:51:02 PM

To whom it may concern,

I'm personally writing to address my issues/concerns with this proposed "freeway connector". This road **cannot** be built. I have a young family and this road will not only impact my standard of living but the lives of my children and the other children in our community. Having grown up in Wisconsin, I used to play freely in my neighborhood, not worried about speeding cars especially in a society that seems to always be "on the go". An increase in traffic through our 'walkable' neighborhood will significantly decrease the amount people enjoying life within their community while increasing the chance of something horrible just waiting to happen. Right now, our streets only offer a glimpse of what I want my children's childhood to be like knowingly we live in one of the most densely populated areas in San Diego. Please don't take that away from them.

DG-1

When we originally purchased our first home together with my wife, it was our understanding that our new neighborhood would be San Diego's next walkable villages. That impressed us because we wanted to find a house that will offer us to easily navigate freely on walks we often take together as a family.

I know my neighbors are as passionate about this topic as we are because collectively we felt lied to by the builders and developers of Civita. As a young family our plead is to reject this proposition as this road will negatively impact our family and those around us.

As you know, San Diego isn't the most efficient city in the country, trolley is somewhat useless, people have to drive everywhere, most people don't have the common courtesy to drive within the speed limits and finally having a community that offers its residents the luxury of walking to and from the grocery store, local business or simply enjoying the southern California weather.

DG-2

I haven't heard a thorough explanation of the logical reason for this road to be built, can someone from this committee please help me understand? Plus, with a proposed school being built at the corner of Via Alta and Civita Boulevard, this freeway connector would endanger not only our children but the other children who live in our neighborhood. But I'm sure as a committee who doesn't live anywhere near us, why should you care, right?

DG-3

Thank you for your attention to this matter.

Carlo Perez

Carlo F. Perez



Senior Director, Configuration and Data Management

Email: carlo.perez@ga.com

Office: 858-455-2248

Mobile : 858-437-1806

CONFIDENTIALITY NOTICE: This communication is intended to be confidential to the person(s) to whom it is addressed. If you are not the intended recipient or the agent of the intended recipient or if you are unable to deliver this communication to the intended recipient, you must not read, use or disseminate this information. If you have received this communication in error, please advise the sender immediately by telephone and delete this message and any attachments without retaining a copy.

Letter DG: Carlo Perez

DG-1: The commenter provides a personal history and reasons for purchasing a home in Civita. The commenter expresses opposition to the proposed roadway connection and general concerns regarding pedestrian safety, walkability, and additional traffic.

Please see the response to comment F-2. This comment raises general concerns related to traffic and pedestrian safety, but does not specifically raise issues regarding the adequacy of the DEIR. Please also see the responses to comments F-4 and F-5 regarding pedestrian safety.

DG-2: The commenter provides general comments about the San Diego area and getting around the city using various modes of transportation. This comment is describing an opinion of existing transportation conditions in the City of San Diego, but does not raise issue regarding the adequacy of the DEIR.

DG-3: The commenter questions the reasons for the construction of the proposed roadway connection and expresses concerns for the safety of children with respect to the proposed school.

As detailed in Chapter 3.0, Project Description, of the DEIR, the City has identified five project objectives for the proposed project, including resolving the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, improving local mobility in the Serra Mesa and Mission Valley planning areas, alleviating traffic congestion and improving navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, improving emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, and providing a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

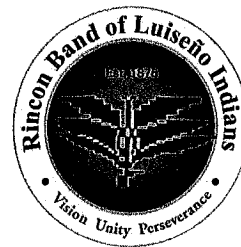
Please see the response to comment F-4 regarding pedestrian safety for the potential future school at Via Alta and Civita Boulevard.

No changes to the FEIR are required as a result of this comment. The comment states opposition to the proposed project but does not raise issue regarding the adequacy of the DEIR.

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2330 Fax: (760) 297-2339



April 3, 2017

Susan Morrison
City of San Diego
Planning Department
1010 2nd Avenue, Suite 1200
East Tower, MS 413
San Diego, CA 92101

Re: Sierra Mesa Community Plan Amendment Roadway Connection Project No. 265605

Dear Ms. Morrison:

DH-1

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Sierra Mesa Community Plan Amendment Roadway Connection Project No. 265605. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

DH-2

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Letter DH: Rincon Band of Luiseño Indians

DH-1: The commenter is providing introductory statements regarding their submittal of comments for the project. This comment does not raise any issues requiring a response pursuant to CEQA.

DH-2: The commenter states their concerns for impacts to historic and cultural resources and culturally significant items that could be disturbed or destroyed, but states that the project location is not within Luiseno Aboriginal Territory and recommends locating a tribe within the project area.

All culturally affiliated tribal groups in San Diego County were sent a public notice for the recirculated DEIR. At the close of public review, in addition to this letter indicating the project is not within the aboriginal territory or boundaries of the territory that the Rincon tribe considers its Traditional Use Area (TUA), only one other comment letter was received from the Viejas Tribal Government indicating that the project site has cultural significance or ties to Viejas, also requesting a Kumeyaay Native American monitor during any ground disturbing activities associated with project implementation. Please see the response to comment DI-2 below.

In accordance with the provisions of CEQA and Assembly Bill 52 (AB 52), tribal consultation was conducted in 2015 with the Iipay Nation of Santa Ysabel to discuss records search results, tribal cultural resource concerns, and mitigation recommendations. Agreement and concurrence was reached regarding the need for archaeological and Native American Kumeyaay monitoring during all project-related activities as further described in Section 5.7, *Historical and Tribal Cultural Resources*, of the DEIR, Subsection 5.7.4.3, Mitigation Measure MM-HIST-1; and consultation was concluded. These recommendations are also consistent with policies included in the City of San Diego's General Plan Historic Preservation Element and as specifically stated in the City's Historical Resources Guidelines for each phase of a project that involves cultural/archaeological resource surveys and/or investigations. Furthermore, the City is committed to maintaining an on-going relationship with the local Native American community through informal and formal consultation/meetings to ensure that the City is meeting its regulatory compliance obligations in accordance with Senate Bill 18 and AB 52.

VIEJAS

TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194455337
viejas.com

4/14/2017

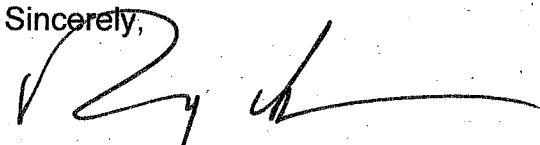
Ms. Susan Morrison
Environmental Planner
City of San Diego
1010 2nd Ave. Suite 1200
East Tower, MS-413
San Diego, CA 92101

RE: Serra Mesa Roadway Connection Project, #265605

Dear Ms. Morrison,

- DI-1 The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site is has cultural significance or ties to Viejas.
- DI-2 Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.
- DI-3 Please call Ernest Pingleton for scheduling at 619-659-2314 or email epingleton@Viejas-nsn.gov. Thank you.

Sincerely,



Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

Letter DI: Viejas Tribal Government

DI-1: The commenter is providing introductory statements regarding their determination that the project site has cultural significant or ties to Viejas. This comment does not raise any issues requiring a response pursuant to CEQA.

DI-2: The commenter requests that a Kumeyaay Cultural Monitor be on site for ground disturbing activities in case of any inadvertent discoveries of cultural artifacts, cremation sites, or human remains. This issue is addressed in Section 5.7, *Historical and Tribal Cultural Resources*, of the DEIR. Mitigation measure MM-HIST-1 requires the presence of a Native American (Kumeyaay) monitor during any ground disturbing activities associated with project implementation.

DI-3: The commenter provides a name, phone number, and email address for further contact. This comment does not raise any issues requiring a response pursuant to CEQA.

Attachment A
Cumulative Project List

Project	Address	Description	ADT (or Net ADT)	Comment
Hazard Center Redevelopment	7510 Hazard Center Dr	Up to 473 residential units		Included in 2012 cumulative project list
Union Tribune Mixed Use	350 Camino De La Reina	193 condos; 234,415 sf office space; 6,470 sf retail	4,344 ADT (net)	CPA; a further look into the peak hour trips was taken. Project trips would not significantly affect study area
Discovery Place	2315 Camino Del Rio North	111 room hotel, 1,800 sf fast food restaurant, 6,000 sf retail	1,971 ADT	Conforms with the Community Plan, permits are being handled ministerially
Residence Inn	445 Camino Del Rio South	5-story-118 room hotel, with underground parking.	1,041 ADT; an ADT credit was not assumed given the "6 month rule"	Conforms with the Community Plan
Morris Cerullo/ Legacy International Center	875 Hotel Circle South	127 timeshare units, theaters and approximately 70,000 sf of misc. religious use	1,512 ADT (net)	CPA; a further look into the peak hour trips was taken. Project trips would not significantly affect study area
Camino Del Rio Mixed Used	730 Camino Del Rio North	305 residential units, 5,00 sf office, 4,000 sf retail	1,432 ADT (net)	Included in 2012 cumulative project list
MVAtlas Multi-Prelim	1904 Hotel Circle North	92,400 sf office/medical office		Conforms with the Community Plan/Specific Plan, Multi-prelim review
Discovery Center	2450 Camino Del Rio	9,450sq ft interpretive building center with educational, meeting and community uses	250 ADT	Conforms with the Community Plan, minimal ADT generation
Riverwalk Multi-Prelim	1150 Mission Valley Rd	Mixed-use and open space		Included in 2012 cumulative project list; Multi-prelim review

Attachment B
Select Link Plot

Phyllis Plan

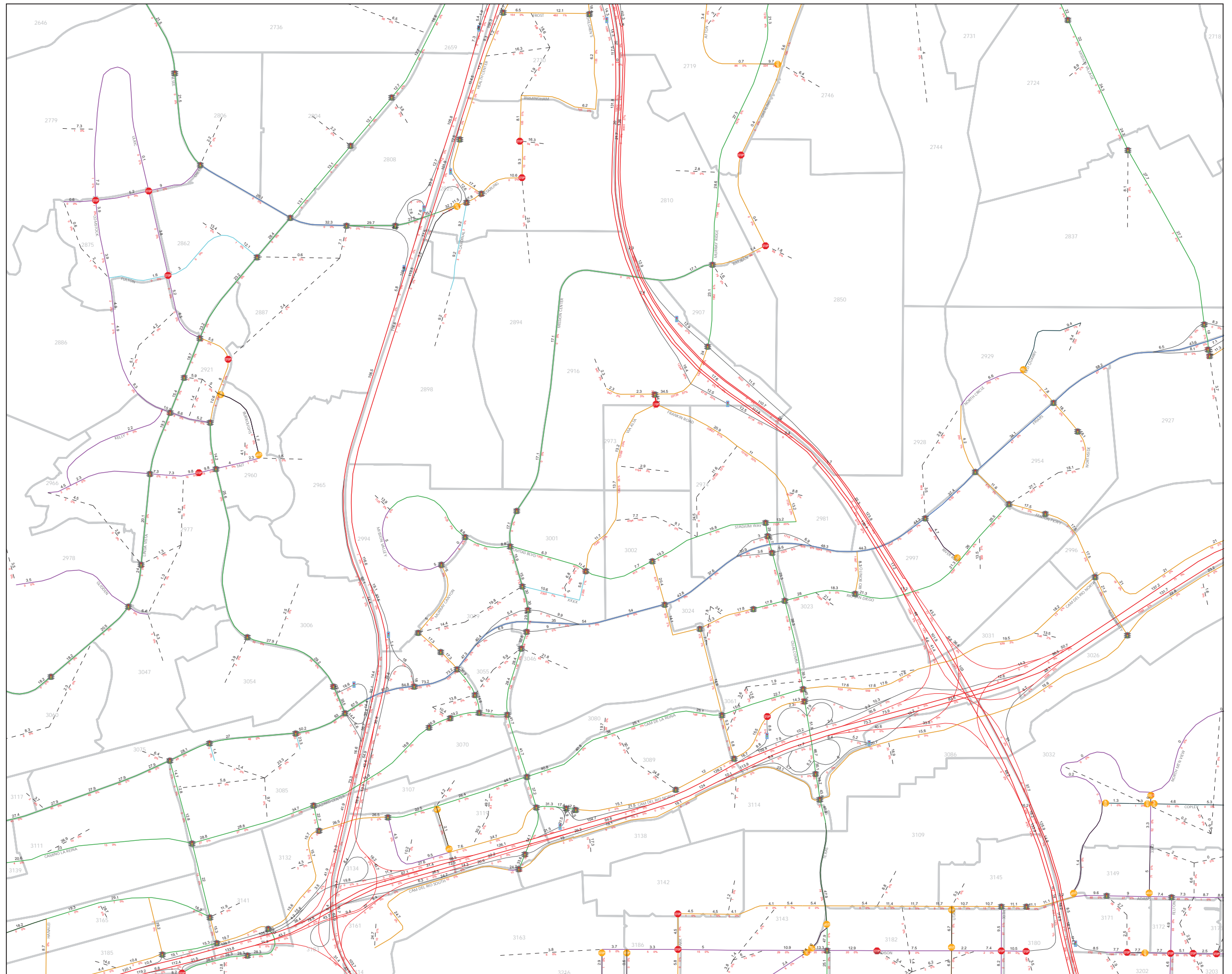
- Freeway
- Prime
- Major
- Collector
- Light Collector
- Rural Collector
- Local
- Freeway Ramp
- Local Ramp
- Zone Connector

Select Link Volume Percentage

SAN DIEGO ASSOCIATION OF GOVERNMENTS
401 B STREET, SUITE 800
SAN DIEGO, CALIFORNIA 92101 USA
(619) 699-1900
E-mail: sandag@sandag.org
Web site: www.sandag.org



Date: May 30, 2013



Attachment C
Fair Share Calculations for Intersections

FAIR-SHARE CALCULATION FOR INTERSECTIONS

NEAR-TERM FAIR-SHARE

Existing *

Existing + Others *

Existing + Others + Project *

A

B

C

$$\text{Percentage of Fair-Share} = \frac{C - B}{C - A} \times 100$$

* A, B & C are the number of vehicles entering the intersection during the higher of AM or PM peak hour.

HORIZON YEAR FAIR-SHARE

Existing *

Horizon Year without Project *

Horizon Year with Project *

A

B

C

$$\text{Percentage of Fair-Share} = \frac{C - B}{C - A} \times 100$$

* A, B & C are the number of vehicles entering the intersection during the higher of AM or PM peak hour.

Attachment D
Caltrans Traffic Mitigation Agreements



**Local Development -
Intergovernmental Review Program**

Traffic Mitigation Agreements

California Department of Transportation

June 2006

**Traffic Mitigation Agreements
with
Local Development Project Proponents**

Procedures for Collecting, Recording, and Expending Fair Share (Pro Rata) Funds
and
Securing Deferred Capital Improvements

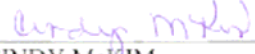
APPROVED:



R. GREGG ALBRIGHT
Deputy Director
Planning and Modal Programs

4/21/06

Date



CINDY McKIM
Chief Financial Officer

4/24/06

Date



RICHARD D. LAND
Chief Engineer

4/25/06

Date



BRUCE BEHRENS
Chief Counsel

6/1/06

Date

Acknowledgement

The Office of Community Planning extends its great appreciation for the individual and collective statewide efforts that made possible the publication of these procedures:

Traffic Mitigation Agreements with Local Development Project Proponents

Procedures for Collecting, Recording, and Expending
Fair Share (Pro Rata) Funds
and
Securing Deferred Capital Improvements

Division of Transportation Planning
Office of Community Planning
Local Development-Intergovernmental Review Program
1120 N Street, Sacramento, CA 95814
PO Box 942874, Sacramento, CA 94274-0001
Telephone (916) 653-0808
Calnet: 8-453-0808
Fax: (916) 653-4570
E-mail: betty_l_miller@dot.ca.gov

Table of Contents

	<u>Page</u>
Definitions	1
Introduction	5
Background	5
Scope	6
Purpose	7
Approach	7
Traffic Mitigation Agreement	7
Accounting for Receipt of Funds	9
I. Districts	10
A. Local Development-Intergovernmental Review (LD-IGR)	10
B. Office of Budgets	10
1. Project Control Officer (PCO)	10
2. Cashier	11
II. Headquarters	11
Division of Accounting	11
1. Cashiering	11
2. Reimbursement Accountant	12
3. EA Control & Overhead Assessment Section	12
Expending the Funds	12
I. Identifying and Scheduling Projects	13
A. Districts	13
1. District Projects Monitor	13
2. Project Manager	13
3. Project Control Officer	13
B. Headquarters	14
1. HQ Budgets	14
2. Office Engineer	14
3. Reimbursement Accountant	15
II. Project Cost Summary	15
Appendices	17

Appendices

1. Flow Chart: Executing an Agreement
2. Template: Fair Share Deferment Agreement
3. Template: Capital Deferment Agreement
4. Flow Chart: Accounting for Receipt of Fair Share Funds
5. Letter: Confirmation of receipt of mitigation measures
funds from Proponent
6. Form: Sample Transfer Receipt (Form STD 440)
7. Flow Chart: Accounting for Expenditure of Fair Share Funds

Definitions

1. **Contributor Number.** Identification number given to local proponent for a specific Agreement by the Reimbursement Accountant at Headquarters (HQ) and matched to the EA. A contributor number is required in order to set up a reimbursement (R) line on an EA in TRAMS.
2. **District Cashier.** District officer who receives mitigation funds from Local Development-Intergovernmental Review (LD-IGR) function, prior to funds being transferred to HQ Cashiering.
3. **District Projects Monitor.** Function in each District responsible for monitoring planned and programmed projects for the purpose of identifying where mitigation funds can be committed. For example, in District 6, Advanced Planning performs the function.
4. **Division of Accounting (DofA), Reimbursement Section.** HQ office responsible for assisting in setting up of both holding and project EAs for mitigation funding and for the subsequent accounting activities required.
5. **Division of Accounting, Office of Financial Accounting & Analysis (OFAA).** HQ office that certifies reimbursement authority for EA and subsequently releases EA for entry into TRAMS. Two separate sections within OFAA have respective responsibilities (Highway Appropriation Management Section [HAMS] and EA Control & Overhead Assessment Section [EA Control]).
6. **Division of Budgets, Capital Outlay (HQ Budgets).** Approves Reimbursement Authority for mitigation measures project EA phase 4 funds.
7. **Expenditure Authorization (EA).** A 6-digit alphanumeric “number” that is assigned to a specific project or work order to track all project-related financial activities. Mitigation funds collected are assigned an “holding” EA. (Temporary EA assigned with an EA status of 21, which is used for billing and collections only.) No activity may be recorded in TRAMS by any Department organization without an EA.
8. **Expenditure Authorization System/Capital Outlay Monitoring System (EAS/COMS).** A subsystem of TRAMS that is used to masterfile an EA.
9. **Funding Package.** Set of funding documents detailing the phase 4 EA construction financing for a capital outlay project. A Funding Package is required for every project submitted to Office Engineer for advertising and award of a construction contract.

10. **Headquarters Cashiering.** Receives funds from District Cashier and posts per instructions received from Reimbursement Accountant.
11. **Lead Agency.** The public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. (CEQA [PRC Section 21067].)
12. **Local Development-Intergovernmental Review (LD-IGR) Coordinator.** Individual designated in each District to coordinate that District's functional responses to environmental review of proposed local development projects.
13. **Local Agency.** Any public agency other than a state agency, board, or commission. (For CEQA, includes redevelopment agency and a local agency formation commission [PRC Section 21062].)
14. **Masterfiled.** A term used to indicate that an EA or contributor number has been entered into TRAMS.
15. **Office Engineer (OE).** Division of Engineering Services office that performs the functions of preparation of the final contract documents, project scheduling, advertisement, bid opening, award, and approval of all Department highway construction contracts over \$120,000.
16. **Project Control Officer (PCO).** District officer authorized and responsible for processing Expenditure Authorization (EA) for mitigation funds upon request of Local Development-Intergovernmental Review (LD-IGR).
17. **Proponent.** Person/entity developing a project.
18. **Public Agency.** Includes any state agency, board, or commission, any county, city and county, city, regional agency, public district, redevelopment agency, or other political subdivision. (CEQA [PRC Section 21063].)
19. **Reimbursement.** Recovery in cash or its equivalent from another governmental unit, fund, or department for an expenditure made on its behalf. Mitigation funds are collected as "reimbursement funds." The reimbursement funding line on an EA is called the "R" line.
20. **Reimbursement Accountant.** First level of approval in HQ A/R for mitigation funds "holding" EA and subsequent masterfiling of both contributor number and project EA into TRAMS.

21. **Reimbursement Authority.** Approval required from HQ Budgets before HAMS can certify phase 4 construction project EAs in EAS/COMS (and before funds can be expended). Reimbursement Authority for mitigation funds is requested only for phase 4 construction projects. (When approved, the mitigation funds Reimbursement Authority is not part of a District's annual Reimbursement Authority allocation for capital projects.)
22. **Traffic Mitigation Agreement (Agreement).** The Agreement entered into directly with a project developer (proponent) in order to collect funds for traffic mitigation measures (Fair Share Deferment), or in order to secure a commitment for improvements (Capital Deferment), to offset impacts to the State Highway System when a project is approved by a local public agency. The Agreement will include attachments of supporting documentation.
23. **Traffic Mitigation Agreement (Agreement) Package.** The Agreement "Package," in addition to the signed and notarized (preferably) Fair Share Deferment Agreement and its attachments, consists of the check and copies of any other pertinent documents generated in the District pertaining to the collection and planned expenditure of the mitigation funds. (Capital Deferment Agreements are not forwarded to HQ Accounting, as there are no mitigation funds collected.)
24. **Transportation and Accounting Management System (TRAMS).** The Department's accounting system.
25. **TRAMS Collector.** Overnight electronic "bin" for EA after it has been released by OFAA, but not yet entered (or uploaded) into TRAMS.
26. **Transfer Receipt.** Form STD. 440 (REV. 6-2000). Used to record the receipt of funds by District Cashier and the subsequent transfer of those funds from District Cashier to HQ Cashiering.

Introduction

The Local Development-Intergovernmental Review (LD-IGR) Traffic Mitigation Agreement (Agreement) was designed to fill a limited need. It is executed directly between the California Department of Transportation (Department) and project developers (proponents), both private and public, in order to capture mitigation to the State Highway System (SHS) that might otherwise be lost.¹

Pursuant to the California Environmental Quality Act (CEQA), public agencies can require proponents to mitigate or avoid significant adverse impacts to the environment prior to approving a proponent's proposed project. Usually, public agencies (lead agencies, under CEQA) administer the collection of funds or other forms of mitigation to the SHS. Under certain circumstances, however, they will require that the proponent work directly with the Department to mitigate impacts to the SHS.

Background

CEQA grants public agencies the authority to mitigate or avoid significant effects to the environment with respect to applicable projects within their jurisdictions. The resulting environmental review, as established by CEQA and its Guidelines, is central to the Department's ability to obtain mitigation for development impacts to the SHS.

The Department reviews proposed planning and development activity for the purpose of identifying potential significant impacts to the SHS. Depending upon the type and size of the proposed project, some degree of traffic analysis will be generated. The analysis may be in the form of a traffic impact study (TIS) conducted by a local public agency or proponent; calculations from the Institute of Transportation Engineers [ITE] *Trip Generation Handbook*; modeling; prior traffic analysis that established per-trip cost; or, some other appropriate method.

Whatever the form of the analysis, if it is determined that a significant impact will result from a proposed project, it is within the authority of the Department to request mitigation that will either eliminate the impact or reduce it to a level of insignificance.

The Department's recommendation for mitigation must be based upon sound technical data that: (1) Establishes a nexus (connection) between the proposed project and the impact to the SHS; and (2) calculates that the mitigation is proportional to the impact (fair share). Recommended mitigation generally results in direct infrastructure improvements, but it may also result in indirect improvements, such as a proponent providing, or enhancing, local transit services.

¹ These procedures do not apply to the execution and administration of Cooperative Agreements, pursuant to California Streets and Highways Code, Sections 114 and 130.

As indicated earlier, a local public agency generally administers mitigation to offset the impact of a local development project to the SHS. The local agency collects the fair share funds from the proponent and accounts for them until such time as the mitigation measures are implemented. When the local public agency does not want to administer mitigation to the SHS, however, the Department can negotiate and execute an Agreement directly with the proponent to collect the funds or to obtain a commitment from the proponent to make improvements.

Scope

These Traffic Mitigation Agreement (Agreement) procedures apply at the end of the Local Development-Intergovernmental Review (LD-IGR) process, when applicable. That is, they apply only when the Department enters into an Agreement directly with a proponent for mitigation of adverse impacts to the SHS caused by a proposed project that is subject to local public agency approval. The procedures are used for agreements between the Department and project proponents, both private and public.

These procedures are based upon the premise that:

- ◆ A proposed local development project underwent an environmental review, resulting in a determination that there will be an adverse impact to the SHS and that mitigation is required; and
- ◆ The Department will enter into an Agreement directly with a proponent to collect fair share mitigation funding; the proponent will commit to construct the mitigation improvements; or, in some instances, to do both.

The Department will enter into the Agreement because:

- ◆ A local public agency does not wish to collect and administer funds for SHS mitigation; therefore, it conditions project approval upon the proponent entering into an Agreement with the Department for the mitigation; or
- ◆ A proponent will approach the Department, already having determined that there will be an impact to some degree, and ask for assistance in calculating fair share mitigation prior to project application to the public agency.

See Appendix 1, Flow Chart, *Executing Fair Share Funds and Deferred Capital Improvement Agreements with Proponents*.

Purpose

The purpose of these procedures is threefold: (1) Provide Agreement templates for use between the Department and local development proponents for direct receipt of mitigation funding or a commitment from the proponent to implement the mitigation measures; (2) describe the steps necessary to enter the direct receipt of funding into the Department's accounting system, the Transportation and Accounting Management System (TRAMS); and, (3) outline the steps necessary to apply the funds to a project.

Approach

The procedures described herein are based upon those that have been in place in District 6 for some time. They reflect the successful coordination of efforts that evolved over the years among the District's multiple functional units, Headquarters Accounting and Budgets Divisions, local public agencies, and proponents.²

We'll begin with a description of how the Agreement templates can be used, depending upon the type of mitigation that is negotiated. That is followed by a description of the procedures that are required to set up an account in TRAMS when funds are collected, and then discuss the expenditure of the funds. Lastly, the Appendices provide supporting information, including the Agreement templates.

Traffic Mitigation Agreement

Depending upon the purpose of the Agreement, one of two templates that were prepared by the Department's Legal Division (Legal) can be used: (1) Fair Share Deferment (we will collect the mitigation funds); and (2) Capital Deferment (the proponent will make the capital improvements--the Department will not collect funds).³

Further, there may be circumstances under which mitigation calls for the proponent to pay a fair share in funds to the Department and construct improvements to the SHS. Under such circumstances, contents of both the Fair Share Deferment and Capital Deferment formats can be used in a combined Agreement. For example, a proponent may need to make improvements that

² District Planning and Engineering units may wonder why the Accounting and Budgeting tasks are included within these procedures. The thought is that if the Planners and Engineers know what information the Accounting and Budgeting staff require, it will make it easier to ensure that the record keeping is complete. Likewise, the Accounting and Budgeting staff can benefit by knowing what the Planners and Engineers are working to accomplish.

³ Since no funds will be collected with a Traffic Mitigation Agreement for Capital Deferment, the Agreement is not forwarded to Headquarters Accounting. However, District Permits should receive a copy if the proponent's project will require an encroachment permit.

LD-IGR Traffic Mitigation Agreements

extend to our right-of-way in order to provide safer and more convenient access to a new development prior to opening for business (perhaps installing a traffic signal). Cumulative traffic impacts of the project may need mitigating, as well, so we would also collect funds for improvements to the mainline facilities.

The flexibility of the Agreement reflects the various types of mitigation that can be negotiated to offset traffic impacts to the SHS.

If the mitigation measures agreed to by the Department and the proponent simply reflect changing those areas of the Agreement that describe specific project information (highlighted in yellow in our templates), it is not necessary to obtain another review by Legal before executing the Agreement. Once executed, the Agreement can be forwarded to Legal for approval of form and procedure. However, if a more extensive re-write of the template than simply changing the “highlights” is necessary, the Agreement must be reviewed by Legal prior to execution.

Mitigation funding can be used for a number of purposes, depending upon the language negotiated in the Agreement between the Department and the proponent. The description of the mitigation measures should be as generic as possible, considering that the particular Agreement measures will normally be part of a larger project. At the same time, the Agreement must be specific enough to ensure that it clearly documents the required connection between project impact and mitigation expenditures.

For example, analysis may determine that a proposed project will contribute to the need for an interchange access improvement. Since there will be various costs associated with the improvement, the Department might identify the location of the interchange without identifying the specific measures to be implemented (underground wire, guard rails, etc.). The more general description provides flexibility and allows the most effective use of the funds. On the other hand, analysis and conditions may dictate that the Department negotiate for a specific improvement, such as a “signal,” “turn lane,” or “portion of HOV lane,” etc.

Keep in mind that many years can go by between receipt and expenditure of the funds. Whether the Agreement describes mitigation in general or in more specific terms, there should be as much detail as possible to aid long term connection of the funding and related expenditures to the mitigation. Whether it is in the Agreement “proper” or part of the supporting documentation, information such as location (including Post Mile, for example, if applicable); name of the project, local jurisdiction, funding amount (unless Capital Deferment), environmental references, and requirements for meeting certain warrants or thresholds by dates (for example, “2020”) should be included.

Each Agreement should be assigned a District number.

All Agreement signatures should be notarized. There is at least one (1) Notary Public on staff at almost all of the Districts---usually part of the Right of Way

function. If in doubt, please contact the District Executive Assistant or Executive Secretary, who can help identify the Notary(ies). Exceptions to having an Agreement notarized will be authorized by the Districts.

When the Department enters into a Capital Deferment Agreement (or if a combined Agreement is executed) it may wish to have the Agreement recorded with the County Clerk as a means to ensure completion of the mitigation project. Other options may be to require a bond or letter of credit. It will depend upon the type of project. Again, Legal will help in determining whether the above, or other, conditions are appropriate.

Appendices 2, and 3 provide sample templates for:

1. Fair Share Deferment Agreement;
2. Capital Deferment Agreement;

Each template provides, in yellow, those areas where the specific language (at a minimum) would need to be changed with each new Agreement in order to reflect the particular requirements and conditions. It is expected, as well, that revisions to the “template” will be made, as warranted.

Accounting for Receipt of Funds

Mitigation funds are accounted for as reimbursements (in TRAMS as fund source “R”).

Procedures for recording the receipt of mitigation funds are similar to those used by the Department in accounting for other reimbursement project funds. In most cases with mitigation funds, however, the Department tracks the funds for many years, so these procedures will emphasize some of the coding requirements for the long-term collections.

Since the Department collects only a proponent’s fair share of mitigation funds, and it could take a long time to gather enough funds to complete an improvement, the funds will not be assigned (generally) a project Expenditure Authorization (EA) at the time they are collected. Rather, an “holding” EA will be established in TRAMS, “R” fund source, EA status 21 (allows only billings and collections to post).

When they are scheduled for a project, the funds will be assigned the project EA. (If an appropriate project exists at the time of collecting the funds, of course, that project’s EA will be assigned to the funds, and the Department won’t have to “hold” them.)

Steps to be taken to enter the funds into TRAMS are described in the following few pages. (These steps assume that a holding EA will be required.)

Also, please see Appendix 4, Flow Chart, *Accounting for Receipt of Fair Share Funds from Proponents*.

I. Districts:

A. Local Development-Intergovernmental Review (LD-IGR):

1. Receive check from the project proponent, following execution of the Agreement.
2. Send a letter, or E-mail, to the local public agency, confirming receipt of the proponent's check for mitigation measures. (See Appendix 5.)
3. Send a copy of the above confirmation to the project proponent.
4. Forward the following documents to the Project Control Officer (PCO):
 - a. Copy of the check.
 - b. Signed Agreement, including attachments.
 - c. Copy of the letter or E-mail that was sent to the local agency confirming receipt of the mitigation funding.
 - d. Request an Expenditure Authorization (EA) for the funding. (The District Cashier needs the EA in order to transfer the funds to HQ Cashiering, also.)
5. Upon receipt of an EA, deliver the check and copy of Agreement Package to District Cashier. Cashier will issue a Transfer Receipt (Form STD. 440).
6. If the proponent's local development project requires an encroachment permit, forward a copy of the Agreement and its attachments, including EA, to Permits.

B. Office of Budgets:

1. Project Control Officer (PCO):
 - a. Assign an EA to the Agreement (holding or project EA, as applicable).
 - b. Fax or e-mail the Agreement Package, to the appropriate Reimbursement Accountant, so that a "Contributor Number" for the project proponent will be masterfiled. Fax to: (916) 227-8789 or Calnet 8-498-8789. In order to determine the appropriate Reimbursement Accountant, go to the Reimbursement contact page located at <http://onramp.dot.ca.gov/hq/accounting/print/OAR0206.doc>. The accountant's name, phone number, and e-mail link are provided.

- c. Upon receipt of the Contributor Number from the Reimbursement Accountant, set up the EA in EAS/COMS, Status 21⁴, and transmit to the Reimbursement Accountant for approval of the set up and R line. (After approval, the EA will be forwarded to HQ EA Control & Overhead Assessment Section [EA Control].)
 - d. Upon entry (approval) of the EA into TRAMS, notify all Department project participants involved, and copy notice to Reimbursement Accountant.
2. Cashier:
- a. Receive proponent's check from LD-IGR. Complete a Transfer Receipt (Form STD. 440) for check and give the original to the LD-IGR staff person who delivered the check. Transfer Receipt must include the following information:
 - (1) Date;
 - (2) Dollar amount collected;
 - (3) Check number;
 - (4) EA number;
 - (5) Purpose (project mitigation);
 - (6) The term "REIMBURSEMENTS";
 - (7) The words "For deposit into 'Account 84'"; and
 - (8) Any other pertinent identifying information (See Appendix 6).
 - b. Forward to HQ Cashiering:
 - (1) Check;
 - (2) Copy of Transfer Receipt;
 - (3) Copy of remainder of Agreement Package documents;
 - (4) Staple documents together.

II. Headquarters

Division of Accounting:

- 1. Cashiering:
 - a. Upon receipt of check, Agreement Package, and copy of Transfer Receipt from District Cashier, enter funds as a deposit of **Reimbursement** dollars into **Account 84**.

⁴ "EA Status 21" allows billings and collections only to post in TRAMS---no expenditures. PCO will **not** obtain Reimbursement Authority, and the EA will **not** have an authorized amount on screen 64 in TRAMS for this "holding" EA. The YI indicator should be set at "0" (zero), indicating that the EA is not to roll forward. (EA will remain in status 21 until the District identifies a project, and the PCO submits a request to Budgets for Reimbursement Authority for the phase 4 under the project EA.)

- b. Upon receipt of an invoice (with EA and contributor number) prepared by the Reimbursement Accountant for the mitigation funds, withdraw these funds from Account 84 and apply to the invoice provided by the Reimbursement Accountant.⁵
- 2. Reimbursement Accountant:
 - a. Upon receipt of Agreement Package from District PCO, assign Contributor Number to the project proponent and notify District PCO.
 - b. Upon receipt (and approval) of EA from District PCO, forward to Office of Financial Accounting & Analysis (OFAA)-Highway Appropriation Management Section (HAMS).
 - c. Upon notice from PCO that EA has been masterfiled, issue an invoice in the amount of the funds received.
 - d. Provide HQ Cashier with invoice copy for mitigation funds. (HQ Cashier will withdraw from Account 84 and apply to invoice number provided by Reimbursement Accountant.)⁶
 - e. Monitor the mitigation funds on deposit in EA Status 21, and manually transfer them to a current Fiscal Year (FY) if the FY in which they are entered is lapsing.
- 3. EA Control & Overhead Assessment Section (EA Control):

Review EA to ensure that information is complete and correct, and upon verification, release for entry into TRAMS COLLECTOR (TU).

Expending the Funds

As discussed earlier, mitigation funding can be used for a variety of improvement purposes, depending upon the language negotiated in the Agreement between the Department and the proponent.

Once a project has been identified, the accounting and budgeting activity begins to move the funds from the holding EA to the project EA in order to offset the funds collected with an encumbrance and expenditures.

Numerous functions will participate in the identification, scheduling, encumbrance, and expending of the funds. There is no attempt here to detail every step that will be taken by every function in the Districts and HQ during the process. The following sections more or less outline actions taken by

⁵ The accounting system requires an invoice number to be applied to the receipt of funds. The Reimbursement Accountant will prepare an invoice for in-house use only for the mitigation funds.

⁶ TRAMS screen 64 will show the invoice and collection amount. This invoice/collection of mitigation funds will remain as such in TRAMS until the funds are transferred to a project EA.

participating functions. It is understood that communication will need to take place between and among the District functions, HQ Accounting, Budgets, and Office Engineers, as projects require.

I. Identifying and Scheduling Projects

A. Districts:

1. District Projects Monitor:

- a. Monitor all District's planned and programmed projects in coordination with LD-IGR and Project Management; and, identify when, in accordance with the Agreement, the proponent's mitigation funding should be included in a project.
- b. Notify the PCO (via E-mail or other written documentation) that the Project Manager has identified mitigation funds as part of a project Funding Package. Notification should include the name of the Project Manager, amount of funding, and the holding EA, as well as the project EA to which the funds will be transferred by the Reimbursement Accountant.⁷
- c. Coordinate with Project Manager and the PCO to ensure that affected District functions are notified.
- d. Ensure that Project Manager receives a copy of Agreement.

2. Project Manager:

- a. Submit project Funding Package to HQ Budgets, with a copy to Office Engineer (OE), requesting project funds.
- b. Forward a copy of Agreement to OE as part of Funding Package.
- c. Identify mitigation funding as a lump sum amount on a separate line in the Funding Package.

3. Project Control Officer:

- a. Upon notification from District Project Monitor that mitigation funds currently in the holding EA have been scheduled for project inclusion, request Reimbursement Authority for the amount of the mitigation funds from HQ Budgets for the project EA. Include Agreement Package with the request.⁸

⁷ Upon transferring from an holding EA to a project EA, the FY will be that of the Reimbursement Authority FY assigned by Budgets.

⁸ Reimbursement Authority required only if the project EA is phase 4 construction (20.20).

- b. Ensure that HQ Accounting, Reimbursement Accountant, is aware of the change from holding EA to project EA through project EA approval (including verifying fund source/distribution to OE) and via e-mail.
- c. Upon receipt of Reimbursement Authority from HQ Budgets (if applicable), forward approval to Reimbursement Accountant and HAMS.
- d. Using a "Contributor Number Request" form, accompanied by an explanatory e-mail, request Reimbursement Accountant to masterfile in project EA the same contributor number previously masterfiled in holding EA.

B. Headquarters:

1. HQ Budgets:

Upon receipt of Agreement Package from District PCO, issue approval of request for Reimbursement Authority for the mitigation funds for phase 4 construction project EA via Memorandum hard copy or e-mail.

2. Office Engineer (OE):⁹

- a. Set up the project Phase 4 EA in EAS/COMS after bid opening.
- b. Enter the authorization amount for each funding source into the EA. When entering the cost percentage distribution for the funding sources, the R-line percent for mitigation funds will be set at "0," and no expenditures will be charged against those funds until the Reimbursement Accountant manually transfers expenditures against them. (Lump sum collections are not included in cost percentage distributions.)
- c. Send EA to District PCO for approval.
- d. Upon receipt of approval from District PCO, route EA to HQ Accounting Reimbursement Accountant and HAMS for certification.
- e. Award contract after the certified EA is received from HQ Accounting HAMS.
- f. Send certified EA to HQ EA Control for release to TRAMS.

⁹ HQ OE will prepare the construction bid package and perform its associated activities for *projects with total estimated costs* of \$120,000 and above. For projects that are not forwarded to OE for processing, Districts will proceed with mitigation projects as they do for other contracts that are not sent to OE for advertising, bid opening, and award.

3. Reimbursement Accountant:

- a. Masterfile holding EA contributor number in project EA.
- b. Transfer billings and collections for contributor from holding EA to project EA's R-line.
- c. Suspend holding EA.
- d. Verify that funds have transferred into the project EA.
- e. When expenditures charged to all other fund sources within the project exceed the amount of the mitigation funds received, the Reimbursement Accountant will manually transfer expenditures to equal the amount of the mitigation invoice/collections.
- f. Work with the District LD-IGR counterpart throughout the mitigation project.

II. Project Cost Summary

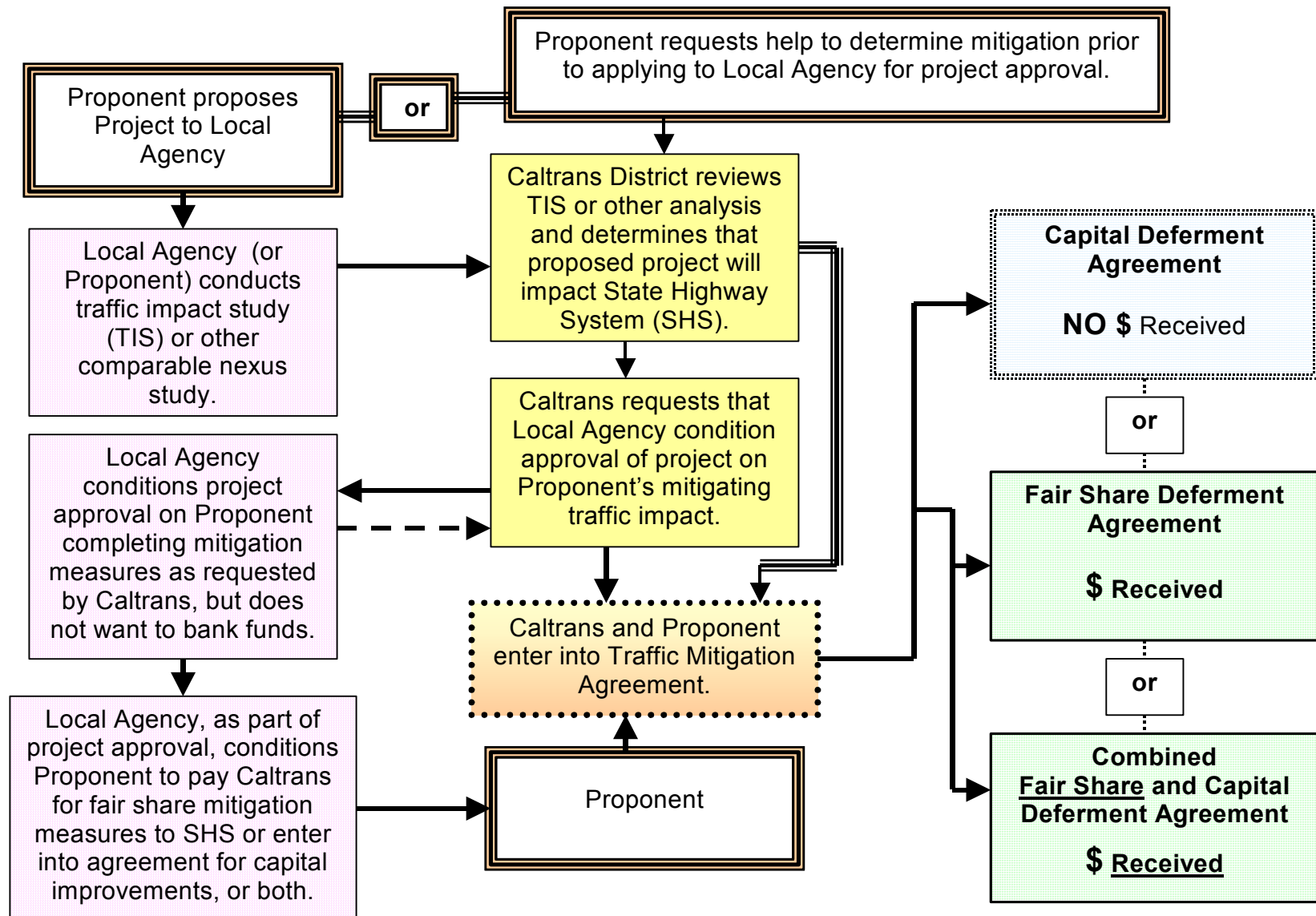
The Reimbursement Accountant will prepare a Project Cost Summary (final accounting) for the mitigation funds when the construction project is complete and will forward a copy to the District Local Development-Intergovernmental Review contact.

Please see Appendix 7, Flow Chart, *Accounting for Expenditure of Fair Share Funds Received from Proponents*.

A p p e n d i c e s



California Department of Transportation
Traffic Mitigation Agreements with Local Development Project Proponents
Executing Fair Share Funds and Deferred Capital Improvement Agreements with Proponents (Developers)



--- Local Agency response to Caltrans

TRAFFIC MITIGATION AGREEMENT

TEMPLATE

FAIR SHARE DEFERMENT

THIS AGREEMENT, entered into effective this [] day of [], 2006, by and between the State of California, acting by and through its Department of Transportation, hereinafter referred to as "Department," and [], hereinafter referred to as "Owner," and collectively the "Parties" without regard for number or gender.

RECITALS¹

- A. WHEREAS, Owner has proposed to develop [] located in the [] County/City of [], hereinafter referred to as "Proposed Development," which will be constructed on a piece of real property, hereinafter referred to as "Property," which is more particularly described in Exhibit "A," attached hereto and incorporated herein by this reference; and
- B. WHEREAS, as part of the environmental process for this Proposed Development, a [] Traffic Impact Study (TIS) was prepared and that TIS² has determined that the Proposed Development would result in (ex. [] adverse impacts to State Route (SR) 60 at Fremont Interchange), hereinafter referred to as "Impacts"; and
- C. WHEREAS, that TIS³ also identified specific mitigation measures to mitigate for those Proposed Development Impacts, specifically that Owner would pay to Department a pro rata share of the total anticipated costs of improvements required at [] SR-60 at Fremont Interchange. Said pro rata share has been determined to be [] % of total improvement costs associated with this Proposed Development, which is equal to]⁴ \$ [] XXXX, hereinafter referred to as "Funds"; and
- D. WHEREAS, Owner now desires to mitigate for the Proposed Development Impacts by paying Funds to Department.

¹ The recital section needs to match the proposed project. Recital section generally tells the "story" as to why the Department and Owner are entering into this Agreement.

² or, [] Department, based upon Institute of Traffic Engineers (ITE) methodologies and consistent with Department's traffic study guide,] Also note that, while some jurisdictions may not require mitigation during the entitlement process, it does not preclude the Owner from entering into an agreement with Department to offset impacts caused by the Project. However, this should be done only in limited circumstances and in lieu of the Department challenging the Development project's environmental document. As always, the Department will continue to provide IGR comments that include mitigation to offset traffic impacts to the State Highway System as a result of Development projects.

³ or, [] Department's determination described in provision B above].

⁴ If there is no % calculated, delete [text].

LD-IGR Traffic Mitigation Procedures

NOW THEREFORE, for good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the parties hereby agree as follows:

1. Owner agrees to pay to Department, **within thirty (30) days of the above stated effective date of this Agreement**⁵ the Funds which represent Owner's pro-rata share of the anticipated total costs of the improvements required to mitigate Impacts to **SR-60 at Fremont Interchange**.
2. Department hereby acknowledges that upon payment in full of Funds by Owner, Owner will have satisfied its mitigation obligation to Department for Proposed Development Impacts.⁶
3. Said Funds shall remain in the State Highway Account until such time as the balance of other funds necessary to implement the required improvements to **SR-60 at Fremont Interchange** or another equivalent project that would offset the Impacts as required by the California Environmental Quality Act (CEQA) are secured.
4. Department agrees that the Funds paid by Owner pursuant to the terms of this Agreement shall be used for the purposes of instituting the required improvements to **SR-60 at Fremont Interchange** or another equivalent project that would offset the Impacts as required by CEQA.
5. In the event that the Funds are not expended on improvements to **SR-60 at Fremont Interchange**, or another equivalent project that would offset the Impacts as required by CEQA, by Department on or before **December 31, 20xx**, Department shall return to Owner, within sixty (60) days of receipt of Owner's written request, all then unexpended Funds.
6. All obligations of Department under the terms of this Agreement are subject to the appropriation of resources by the Legislature, State Budget Act authority, and the allocation of resources by the California Transportation Commission.
7. This Agreement may be executed in several counterparts and all counterparts so executed shall constitute one agreement that shall be binding on all of the parties, notwithstanding that all of the Parties are not signatory to the original or the same counterpart.
8. This Agreement shall expire when Department has expended all of the Funds; Funds are returned to Owner, in whole or in part pursuant to **Article 5** of this Agreement; or on December 31, **20xx**, whichever occurs first in time.

⁵ or **[as specified at time of grading permit, building permit, occupancy, etc.]**

⁶ We can only acknowledge that Owner has satisfied the Department's mitigation requirements. If the Owner has more than one obligation to the Department, provision 2 will need to be modified.

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as set forth below.

CALIFORNIA DEPARTMENT OF TRANSPORTATION

By: _____
Designated District Official

OWNER

By: _____
Authorized Representative

Approved as to Form and Procedure

Attorney, State of California
Department of Transportation

¹Recording Requested by:)

)

)

)

Conformed Copy to:)

)

)

Department of Transportation

District Address

TEMPLATE

TRAFFIC MITIGATION AGREEMENT

CAPITAL DEFERMENT

THIS AGREEMENT, entered into effective this [redacted] day of [redacted], 2006, by and between the State of California, acting by and through its Department of Transportation, hereinafter referred to as “Department,” and Charles Browning, hereinafter referred to as “Owner.”

RECITALS²

- A. WHEREAS, Owner has proposed to develop a residence located in the City of Opportunity, All County, hereinafter referred to as “Proposed Development.” Said Proposed Development will be constructed on a piece of real property, hereinafter referred to as “Property,” which is more particularly described in Exhibit “A,” attached hereto and incorporated herein by this reference; and
- B. WHEREAS, Owner, as part of compliance with the environmental process, had a Traffic Impact Study (TIS) prepared³ which determined that the Proposed Development would result in adverse impacts to State Route (SR) 41 on the north side of Proposed Development Property, hereinafter referred to as “Impacts”; and
- C. WHEREAS, that TIS, and as incorporated into the Proposed Development’s environmental document,⁴ also identified specific measures to mitigate for those said

¹ This section needs to be removed if the Agreement will not be recorded. See paragraph 8.

² The recital section needs to match the proposed project. Recital section generally tells the “story” as to why the Department and Owner are entering into this Agreement.

³ or, [Department, based upon Institute of Traffic Engineers (ITE) methodologies and consistent with Department’s traffic study guide,] Also note that, while some jurisdictions may not require mitigation during the entitlement process, it does not preclude the Owner from entering into an agreement with Department to offset impacts caused by the Project. However, this should be done only in limited circumstances and in lieu of the Department challenging the Development project’s environmental document. As always, the Department will continue to provide IGR comments that include mitigation to offset traffic impacts to the State Highway System as a result of Development projects.

⁴ or, [Department’s determination described in provision B above]

Proposed Development Impacts, specifically that Owner would timely complete certain improvements to **SR 41 on the north side of Proposed Development Property**, hereinafter referred to as “Mitigation Measures”; and

- D. WHEREAS, Department and Owner now desire to set forth the terms and conditions that will allow Owner to proceed with Proposed Development and phase the implementation of the Mitigation Measures, when requested by Department, in a manner that will offset the Impacts.

NOW THEREFORE, for good and valuable consideration, the receipt and adequacy of which are hereby acknowledged, the parties hereby agree as follows:

1. Department agrees that Owner may delay implementation of the Mitigation Measures until after the initiation of the Proposed Development and until such time as the Department provides written notice to Owner that those said Mitigation Measures must be commenced.
2. Owner agrees to begin commencement of said Mitigation Measures within sixty (60) days of issuance of said written notification by Department to Owner that Mitigation Measures are to commence.
3. Owner agrees to ensure that Mitigation Measures comply with all applicable State and Federal requirements [including, but not limited to, the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), if applicable], conform to all then applicable Departmental standards, including obtaining an encroachment permit, and may include entering into another form of agreement for work on or adjacent to Department’s property. Furthermore, Owner agrees to ensure that those Mitigation Measures are completed to the satisfaction of the Department.
4. Owner agrees to be fully responsible to fund 100% of all of the costs related to implementation of Mitigation Measures.
5. Neither Department nor any officer or employee thereof is responsible for any injury, damage or liability occurring by reason of anything done or omitted to be done by Owner under or in connection with any work or authority arising under this Agreement. It is understood and agreed that Owner shall fully defend, indemnify and save harmless Department and all of its officers and employees from all claims, suits or actions of every name, kind and description brought forth under, including, but not limited to, tortious, contractual, inverse condemnation and other theories or assertions of liability occurring by reason of anything done or omitted to be done by Owner under this Agreement.
6. Owner shall maintain in force, until completion and acceptance of the Mitigation Measure by Department, a policy of Liability Insurance, including coverage of Bodily Injury Liability and Property Damage Liability, naming the State of California, its

- officers, agents and employees as the additional insured in the amount of One Million Dollars for bodily injury and property damage per person and Two Million Dollars in aggregate. Coverage shall be evidenced by a Certificate of Insurance in a form satisfactory to Department that shall be delivered to Department at the time mitigation measures are started.
7. Department acknowledges that upon completion and acceptance of Mitigation Measures by Department, Owner will have satisfied its mitigation obligation to Department for Proposed Development Impacts.
 8. This Agreement is an instrument affecting the title or possession of the Property described herein. All of the terms, covenants and conditions herein shall be binding upon the successors in interest of Owner and, upon the sale of Property, shall apply to the successor(s) who shall succeed to all of the obligations imposed upon the Owner by this Agreement. In the event that said Property is subdivided, the terms, covenants and conditions herein shall be binding upon the successors in interest of Owner, and upon the sale of the subdivided Property shall apply to the successor(s) who shall succeed to those obligations imposed upon the Owner by this Agreement. Furthermore, Owner shall record a copy of this Agreement against the title of the Property in the office of the Recorder of All County and provide, within thirty (30) days thereafter, a conformed copy to Department.⁵
 9. This Agreement may be executed in several counterparts and all counterparts so executed shall constitute one agreement that shall be binding on all of the parties, notwithstanding that all of the parties are not signatory to the original or the same counterpart.
 10. If any part of this Agreement is held to be illegal or unenforceable by a court of competent jurisdiction, the remainder of this Agreement shall be given effect to the fullest extent reasonably possible.
 11. Any and all obligations assumed by the Department under this Agreement that are not fully reimbursed by the Owner are conditioned upon the creation, appropriation,

⁵ One or both of the following provisions may be inserted into the Agreement in place of Paragraph 8, or one or both may be added to the Agreement, depending upon which will provide the Department with the best assurances that the mitigation measures will be implemented. For example, we will need to know if the property will be transferred to a new owner, will the property be subdivided, when will the mitigation measures need to be implemented, etc. Legal will advise when Agreement is being negotiated.

a. Owner shall furnish a renewable performance bond, naming Department as the obligee, in the amount of not less than one hundred and ten percent (110%) of the total cost of Mitigation Measures, estimated to be XXX. No later than thirty (30) days prior to the expiration of each twelve (12) month period, Owner shall provide a one (1) year extension of the bond or obtain new bonds. Each bond shall continue until such time as the Mitigation Measures are completed by Owner and accepted by Department.

b. Owner shall obtain and provide a copy to Department an irrevocable letter of credit, with Department being named as the intended beneficiary with full right to draw upon said letter of credit, in the amount of \$ _____, a sum equivalent to not less than one hundred and ten percent (110%) of the estimated total cost of Mitigation Measures.

LD-IGR Traffic Mitigation Procedures

allocation and encumbrance of sufficient revenues and resources by the Legislature, State Budget Act Authority, and the California Transportation Commission.

12. This Agreement shall expire when Owner has completed and Department has accepted the Mitigation Measures described within this Agreement or Department has notified Owner in writing that improvements are not required and that Owner no longer has any such obligation to complete those Mitigation Measures.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as set forth below.

CALIFORNIA DEPARTMENT OF TRANSPORTATION

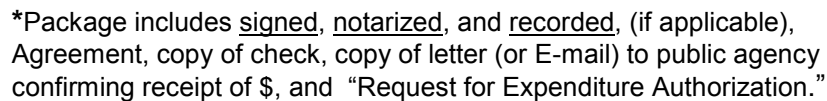
By: _____
Designated District Official

CHARLES BROWNING

Authorized Representative

Approved as to Form and Procedure

Attorney, State of California,
Department of Transportation



***Expenditure Authorization System/
Capital Outlay Monitoring System

— — — — — HQ response to Districts

DEPARTMENT OF TRANSPORTATION

DIVISION OF TRANSPORTATION PLANNING, MS-32

1120 N STREET

P. O. BOX 942874

SACRAMENTO, CA 94274-0001

PHONE (916) 653-0808

FAX (916) 653-4570



Use District Letterhead or E-Mail

Flex your power!
Be energy efficient!

April 5, 2006

Ms. Annabel Carter
City of California
1234 Somewhere Street
California, CA 91234-1234

Subject: Receipt of Mitigation Measures Funds, Generic Proponent, Traffic Mitigation Agreement, dated April 1, 2006

Dear Ms. Carter:

The California Department of Transportation (Department) received Generic Proponent's fair share payment in the amount of \$6,400.00 (Six Thousand and Four Hundred Dollars) for mitigation measures to be applied to future signalization of State Route (SR) 44/Daisy Avenue intersection, as specified in the subject Agreement and the public agency document that approved the project on condition of the mitigation measures.

The Department considers the fair share amount to be adequate mitigation for traffic related impacts to the SR 44/Daisy Avenue intersection.

Please call me at (559) 445-5868 if you have any questions.

Sincerely,

MICHAEL ANGELO
Office of Transportation Planning
District 6

S A M P L E

c: Generic Project Proponent
District Permit Engineer

*****Whether by letter or e-mail,*****
ensure that confirmation to public agency
contains reference to binding agreement/s.

California Department of Transportation
Traffic Mitigation Agreements with Local Development Project Proponents

Transfer Receipt (Form STD. 440)

Sample
Larger Than Actual Form

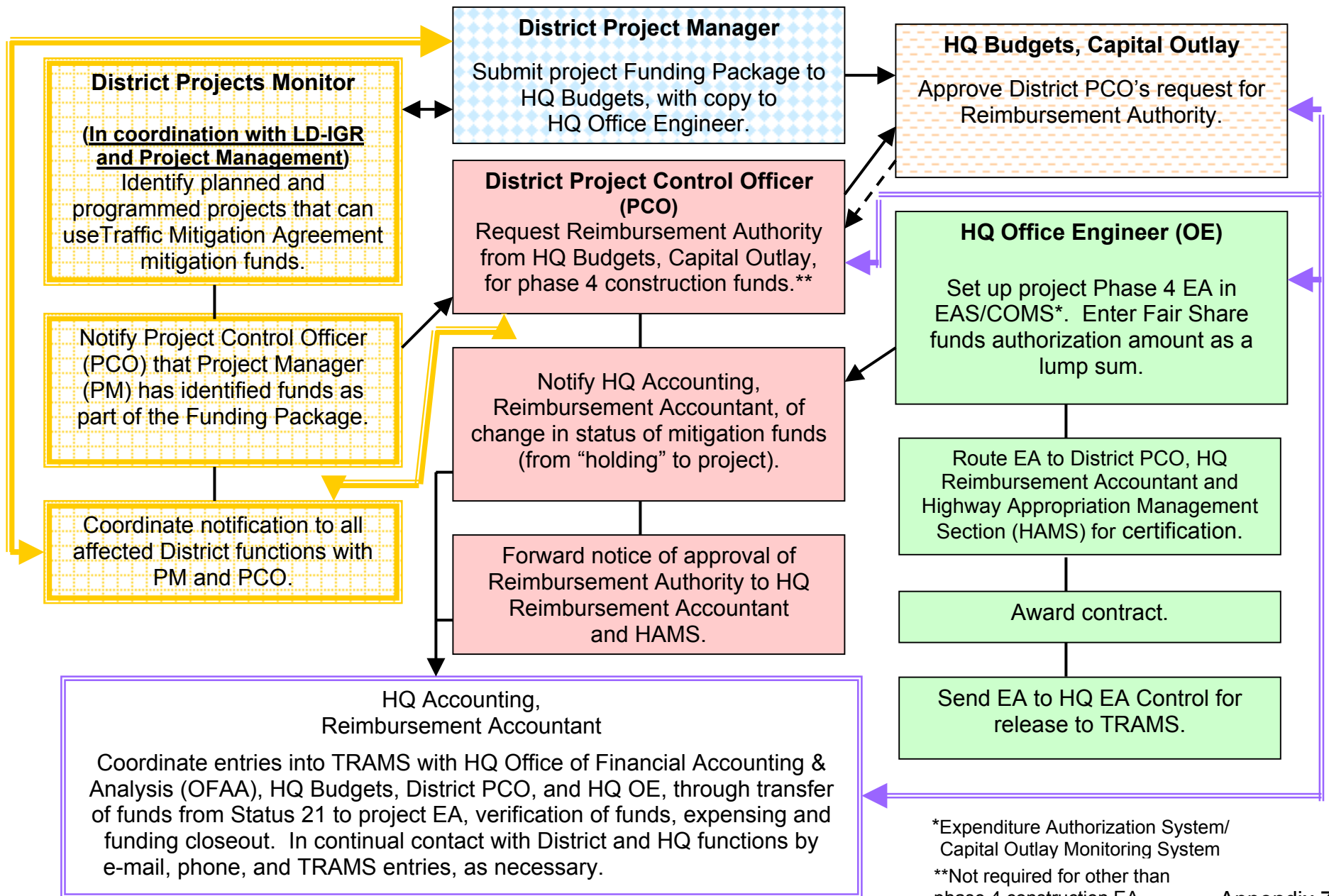
STATE OF CALIFORNIA-DEPARTMENT OF FINANCE STD. 440 (REV. 6-2000)		TRANSFER RECEIPT NOT A RECEIPT FOR PAYMENT BY THE PUBLIC	
ORIGINAL-TRANSFEROR DUPLICATE-TRANSFeree TRIPLICATE--ACCOUNTING RECORD		DATE: <u>April 5</u>	20 <u>06</u>
RECEIVED FROM <u>Dedicated Employee / Generic Proponent</u>		<u>\$ 6,400.00</u>	
EA# 06-0C0004 Check #: 123456		<u>District Cashier</u> SIGNATURE OF TRANSFeree	
Traffic Mitigation Agreement, dated April 1, 2006			
<u>Reimbursement Funds - Deposit to Acct#: 84</u>			
OSP 02 72902			

Cashier:

- a. Complete a Transfer Receipt (Form STD. 440) for check and give original to LD-IGR. Transfer receipt should include the date, dollar amount collected, check number, EA number (holding), date of Agreement, and any other pertinent identifying information.
- b. Clearly indicate that these are “**Reimbursement Funds**” for deposit into “**Account 84.**”
- c. Staple check, copy of Transfer Receipt and copy of Agreement together, and forward to HQ Cashiering.



California Department of Transportation
Traffic Mitigation Agreements with Local Development Project Proponents
Accounting for Expenditure of Fair Share Funds Received from Proponents





Serra Mesa Community Plan Amendment Roadway Connection Project: Final Environmental Impact Report

SCH # 2012011048

Project # 265605

Prepared by:
City of San Diego
Planning Department
1010 Second Avenue
San Diego, California 92101

August 2017



Contents

List of Tables	vii
List of Figures.....	x
List of Acronyms and Abbreviations	xii
Executive Summary	S-1
Project Description	S-1
Overview	S-1
Project Location and Setting	S-2
Project Objectives	S-2
Areas of Known Controversy/Issues Raised by Agencies and the Public	S-2
Summary of Environmental Impacts	S-3
Summary of Project Alternatives	S-3
Alternative 1 – No Project Alternative	S-4
Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative.....	S-4
Environmentally Superior Alternative	S-5
Chapter 1 Introduction.....	1-1
1.1 Purpose of CEQA and the EIR.....	1-1
1.2 Intended Uses of this EIR	1-1
1.3 Scope and Content of this EIR.....	1-2
1.3.1 Notice of Preparation and Scoping Period.....	1-2
1.3.2 Environmental Analysis Content.....	1-2
1.4 Availability of this EIR.....	1-3
1.5 Incorporation by Reference in this EIR	1-4
1.6 Organization of this EIR.....	1-4
Chapter 2 Environmental Setting	2-1
2.1 Regional Setting	2-2
2.1.1 Project Location	2-2
2.1.2 Surrounding Uses.....	2-2
2.2 Existing Physical Site Conditions	2-3
2.3 Existing Transportation Network	2-3
2.3.1 Existing Roadway Network	2-3
2.3.2 Existing Transit Network	2-4
2.3.3 Existing Pedestrian and Bicycle Circulation Network	2-5
2.4 Existing Emergency Services	2-5
2.4.1 Fire Protection and Emergency Medical Services.....	2-6

2.4.2	Police Protection	2-6
Chapter 3	Project Description	3-1
3.1	Project Objectives	3-1
3.2	Project Background	3-1
3.2.1	Project Initiation	3-1
3.2.2	Relationship to Quarry Falls Project	3-3
3.3	Project Components	3-4
3.3.1	Proposed Roadway	3-4
3.3.2	Community Plan Amendment	3-7
Chapter 4	History of Project Changes	4-1
Chapter 5	Environmental Analysis	5-1
	Potential Environmental Impacts	5-1
	Format of the Environmental Analysis	5-1
	Existing Conditions	5-1
	Regulatory Framework	5-2
	Impact Analysis	5-2
5.1	Land Use	5.1-1
5.1.1	Existing Conditions	5.1-1
5.1.2	Regulatory Framework	5.1-3
5.1.3	Significance Determination Thresholds	5.1-10
5.1.4	Impact Analysis	5.1-11
5.1.5	Impact Analysis	5.1-13
5.1.6	Impact Analysis	5.1-27
5.1.7	Impact Analysis	5.1-28
5.1.8	Impact Analysis	5.1-28
5.2	Transportation and Circulation	5.2-1
5.2.1	Existing Conditions	5.2-1
5.2.2	Regulatory Framework	5.2-14
5.2.3	Significance Determination Thresholds	5.2-17
5.2.4	Impact Analysis	5.2-19
5.2.5	Impact Analysis	5.2-31
5.2.6	Impact Analysis	5.2-48
5.2.7	Impact Analysis	5.2-49
5.2.8	Impact Analysis	5.2-51
5.3	Air Quality	5.3-1
5.3.1	Existing Conditions	5.3-1
5.3.2	Regulatory Framework	5.3-7

5.3.3	Significance Determination Thresholds	5.3-12
5.3.4	Impact Analysis	5.3-14
5.3.5	Impact Analysis	5.3-15
5.3.6	Impact Analysis	5.3-18
5.3.7	Impact Analysis	5.3-22
5.3.8	Impact Analysis	5.3-22
5.3.9	Impact Analysis	5.3-23
5.4	Noise	5.4-1
5.4.1	Existing Conditions.....	5.4-1
5.4.2	Regulatory Framework	5.4-8
5.4.3	Significance Determination Thresholds	5.4-12
5.4.4	Impact Analysis	5.4-14
5.4.5	Impact Analysis	5.4-16
5.4.6	Impact Analysis	5.4-18
5.4.7	Impact Analysis	5.4-21
5.4.8	Impact Analysis	5.4-22
5.5	Biological Resources	5.5-1
5.5.1	Existing Conditions.....	5.5-1
5.5.2	Regulatory Framework	5.5-5
5.5.3	Significance Determination Thresholds	5.5-9
5.5.4	Impact Analysis	5.5-11
5.5.5	Impact Analysis	5.5-15
5.5.6	Impact Analysis	5.5-17
5.5.7	Impact Analysis	5.5-17
5.5.8	Impact Analysis	5.5-18
5.5.9	Impact Analysis	5.5-18
5.6	Paleontological Resources	5.6-1
5.6.1	Regulatory Framework	5.6-1
5.6.2	Environmental Setting	5.6-1
5.6.3	Significance Determination Thresholds	5.6-2
5.6.4	Impact Analysis	5.6-2
5.7	Historical and Tribal Cultural Resources	5.7-1
5.7.1	Existing Conditions.....	5.7-1
5.7.2	Regulatory Framework	5.7-4
5.7.3	Significance Determination Thresholds	5.7-8
5.7.4	Impact Analysis	5.7-9
5.7.5	Impact Analysis	5.7-16

5.8	Hydrology and Water Quality	5.8-1
5.8.1	Existing Conditions	5.8-1
5.8.2	Regulatory Framework	5.8-3
5.8.3	Significance Determination Thresholds	5.8-11
5.8.4	Impact Analysis	5.8-11
5.8.5	Impact Analysis	5.8-12
5.8.6	Impact Analysis	5.8-13
5.9	Visual Effects and Neighborhood Character	5.9-1
5.9.1	Existing Conditions	5.9-1
5.9.2	Regulatory Framework	5.9-3
5.9.3	Significance Determination Thresholds	5.9-7
5.9.4	Impact Analysis	5.9-8
5.9.5	Impact Analysis	5.9-9
5.9.6	Impact Analysis	5.9-10
5.9.7	Impact Analysis	5.9-11
5.10	Greenhouse Gases	5.10-1
5.10.1	Existing Conditions	5.10-1
5.10.2	Regulatory Framework	5.10-3
5.10.3	Significance Determination Thresholds	5.10-8
5.10.4	Impact Analysis	5.10-10
5.10.5	Impact Analysis	5.10-12
Chapter 6 Cumulative Impacts		6-1
6.1	Methodology	6-1
6.2	List of Cumulative Projects	6-2
6.3	Cumulative Impact Analysis	6-3
6.3.1	Land Use	6-3
6.3.2	Transportation and Circulation	6-6
6.3.3	Air Quality	6-14
6.3.4	Noise	6-16
6.3.5	Biological Resources	6-18
6.3.6	Historical and Tribal Cultural Resources	6-20
6.3.7	Hydrology and Water Quality	6-21
6.3.8	Visual Effects and Neighborhood Character	6-23
6.3.9	Greenhouse Gas Emissions	6-24
Chapter 7 Effects Not Found To Be Significant		7-1
7.1	Agricultural and Forestry Resources	7-1
7.2	Energy Use	7-2

7.3	Geologic Conditions	7-5
7.4	Health and Safety.....	7-7
7.5	Mineral Resources	7-9
7.6	Population and Housing.....	7-9
7.7	Public Services and Facilities.....	7-10
7.7.1	Fire–Rescue Services.....	7-10
7.7.2	Police Services.....	7-11
7.7.3	Schools	7-11
7.7.4	Libraries.....	7-12
7.7.5	Parks.....	7-12
7.8	Public Utilities	7-12
7.8.1	Water	7-12
7.8.2	Wastewater/Sewer	7-13
7.8.3	Solid Waste	7-13
7.8.4	Natural Gas	7-13
7.8.5	Communication Systems	7-13
7.9	Recreation.....	7-13
Chapter 8 Mandatory Discussion Areas		8-1
8.1	Significant Effects that Cannot Be Avoided	8-1
8.1.1	Transportation/Circulation	8-1
8.2	Significant Irreversible Environmental Changes	8-2
8.3	Growth-Inducing Impacts	8-4
8.3.1	Population Growth.....	8-4
8.3.2	Substantially Alter Planned Growth.....	8-5
8.3.3	Extension of Infrastructure	8-5
Chapter 9 Alternatives		9-1
9.1	Overview	9-1
9.2	Requirements for Alternative Analysis	9-1
9.3	Selection of Alternatives.....	9-1
9.4	Alternatives Considered.....	9-3
9.4.1	Alternatives Considered but Rejected	9-3
9.4.2	Alternatives Selected for Analysis.....	9-4
9.5	Analysis of Alternatives.....	9-5
9.5.1	Analysis of Alternative 1 – No-Project Alternative	9-6
9.5.2	Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative	9-12
9.5.3	Environmentally Superior Alternative	9-15

Chapter 10 Preparers of this Report	10-1
Chapter 11 References	11-1
Appendix A	Notice of Preparation and Scoping Comments
Appendix B	Proposed Serra Mesa Community Plan Amendment
Appendix C	Traffic Impact Study
Appendix D	Air Quality
Appendix E	Noise Assessment
Appendix F	Biological Resources
Appendix G	Geologic Reconnaissance
Appendix H	Vehicle Miles Traveled Output and Summary

Tables

Table	Page
ES-1 Summary of Significant Project Impacts and Mitigation Measures.....	S-6
1-1 List of Required Discretionary Actions.....	1-2
1-2 Document Organization and CEQA Requirements	1-5
5.1-1 Proposed Project’s Consistency with the City of San Diego 2008 General Plan.....	5.1-14
5.1-2 Proposed Project’s Consistency with the Serra Mesa Community Plan.....	5.1-24
5.2-1 Level of Service Definitions	5.2-7
5.2-2 Roadway Classifications and LOS Standards.....	5.2-7
5.2-3 Roadway Segments: Existing Conditions	5.2-8
5.2-4 Signalized Intersection LOS Criteria	5.2-9
5.2-5 Intersections: Existing Peak-Hour Conditions.....	5.2-10
5.2-6 Ramp Meter: Existing Conditions	5.2-11
5.2-7 Freeway Segment LOS Criteria.....	5.2-12
5.2-8 Freeway Mainline Segments: Existing Conditions	5.2-13
5.2-9 City of San Diego Traffic Impact Significance Thresholds	5.2-19
5.2-10 Roadway Segments: Near-Term Baseline Condition vs Near-Term Project Condition	5.2-20
5.2-11 Intersections: Near-Term Baseline Condition vs Near-Term Project Condition	5.2-22
5.2-12 Ramp Metering: Near-Term Baseline Condition vs Near-Term Project Condition.....	5.2-24
5.2-13 Freeway Mainline Segments: Near-Term Baseline Condition vs Near-Term Project Condition.....	5.2-25
5.2-14 Roadway Segments: Near-Term Baseline Plus Project Condition (Unmitigated vs. Mitigated)	5.2-30
5.2-15 Intersections: Near-Term Baseline Plus Project Condition (Unmitigated vs. Mitigated)	5.2-30
5.2-16 Roadway Segments: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project.....	5.2-32
5.2-17 Intersections: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project	5.2-34

5.2-18	Ramp Metering: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project	5.2-37
5.2-19	Freeway Mainline Segments: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project	5.2-38
5.2-20	Roadway Segments: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated)	5.2-45
5.2-21	Intersections: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated).....	5.2-46
5.2-22	Ramp Metering: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated)	5.2-47
5.2-23	Community Access Travel Times.....	5.2-50
5.3-1	Ambient Air Quality Data	5.3-5
5.3-2	San Diego Air Basin Attainment Classification	5.3-6
5.3-3	Ambient Air Quality Standards	5.3-8
5.3-4	San Diego Air Pollution Control District Air Quality Significance Thresholds	5.3-13
5.3-5	Estimated <u>Project</u> Construction Emissions (pounds per day)	5.3-16
5.3-6	Estimated <u>Project</u> Operational Emissions (pounds per day)	5.3-17
5.3-7	CALINE4 Predicted Carbon Monoxide Concentrations.....	5.3-21
5.4-1	Typical Noise Levels in the Environment	5.4-3
5.4-2	Measured Noise Levels and Community Noise Equivalent Level	5.4-8
5.4-3	Caltrans Vibration Damage Potential Threshold Criteria.....	5.4-9
5.4-4	City of San Diego Sound Level Limits	5.4-10
5.4-5	Traffic Noise Significance Thresholds	5.4-12
5.4-6	Estimated Construction Noise Impact Distances by Phase.....	5.4-14
5.4-7	Near-Term (Year 2017) Traffic Noise Model Results (dBA CNEL)	5.4-17
5.4-8	Long-Term (Year 2035) Traffic Noise Model Results (dBA CNEL)	5.4-20
5.4-9	Estimated Distances from Construction Activities to Vibration Effects	5.4-21
5.5-1	Direct Impacts on Vegetation Communities and Land Cover Types.....	5.5-15
5.9-1	Relevant General Plan Policies.....	5.9-3
5.10-1	California Greenhouse Gas Inventory (2014)	5.10-2

5.10-2	Relevant General Plan Policies.....	5.10-6
5.10-3	Estimated Construction Emissions (metric tons)	5.10-10
5.10-4	Estimated Annual Vehicle Miles Traveled and Operational Emissions (metric tons).....	5.10-12
6-1	Cumulative Projects List.....	6-2
6-2	City of San Diego Measure of Significant Project Traffic Impacts.....	6-6
6-2	Summary of Near-Term (Year 2017) Impacts on Roadways, Intersections, and Metered Freeway On-Ramps.....	6-8
6-3	Summary of Long-Term (Year 2035) Impacts on Roadways, Intersections and Metered Freeway On-Ramps.....	6-9
6-4	Summary of Near-Term (Year 2017) Mitigation Measures	6-10
6-5	Summary of Long-Term (Year 2035) Mitigation Measures	6-11
7-1	Estimated Annual Operational Energy Consumption	7-3
9-1	Summary of Significant Effects of the Proposed Project	9-2
9-2	Summary Impacts of Alternatives Relative to the Proposed Project	9-6

Figures

Figure	Follows Page
2-1 Regional Map	2-2
2-2 Vicinity Map	2-2
2-3 Land Uses Surrounding the Project Site.....	2-2
2-4 Existing Roadway Network	2-4
2-5 Existing Transit Facilities within Project Vicinity	2-4
2-6 Fire and Police Stations within Project Vicinity	2-6
3-1 Project Site	3-2
3-2 Quarry Falls Specific Plan Land Use Plan	3-2
3-3 Road Connection to Phyllis Place, Alternative 4 (as depicted in Quarry Falls PEIR).....	3-2
3-4a Quarry Falls Phasing Plan.....	3-4
3-4b Quarry Falls Pedestrian Circulation and Linkages.....	3-4
3-5a Phyllis Place Park with Proposed Roadway	3-4
3-5b Phyllis Place Park without Proposed Roadway	3-4
3-6 Quarry Falls Conceptual Park Plan	3-4
3-7 Standard Four-Lane Major Roadway Cross-Section	3-6
3-8 Standard Four-Lane Major Roadway Intersection	3-6
5.1-1 General Plan Land Use Designation	5.1-2
5.1-2 Zoning	5.1-2
5.1-3 Montgomery Field Airport Influence Area.....	5.1-10
5.2-1 Traffic Impact Study Area	5.2-2
5.2-2 Existing Circulation Network.....	5.2-2
5.2-3 Existing Intersection Configurations	5.2-4
5.2-4 Long-Term Scenario (2035) Intersection Configurations.....	5.2-34
5.4-1 Noise Measurement and Modeling Locations	5.4-8
5.4-2 Montgomery Field Noise Compatibility	5.4-22

5.5-1	Biological Resources	5.5-16
5.8-1	Hydrologic Subarea	5.8-2
5.8-2	Drainage Overview	5.8-2
6-1	Cumulative Projects Location	6-2
7-1	Geologic Hazards and Faults	7-6
7-2	Montgomery Field Safety Compatibility Map	7-8
7-3	Very High Fire Hazard Severity Zone	7-8

Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
µPa	microPascals
AB	Assembly Bill
ADD	Assistant Deputy Director
ADT	average daily traffic
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APE	Area of Potential Effects
ARB	California Air Resources Board
ATCM	Airborne Toxic Control Measure
Basin Plan	Water Quality Control Plan for the San Diego Basin
BAU	business-as-usual
BCME	Biological Construction Mitigation/Monitoring Exhibit
BI	Building Inspector
BMP	best management practice
BTUs	British thermal units
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CALINE4	California LINE Source Dispersion Model
Caltrans	California Department of Transportation
Caltrans CO Protocol	California Department of Transportation Institute of Transportation Studies <i>Transportation Project-Level Carbon Monoxide Protocol</i>

CAP	Climate Action Plan
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CFR	Code of Federal Regulations
CH ₄	methane
City	City of San Diego
CM	Construction Manager
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
Construction General Permit	General Permit for Stormwater Discharges Associated with Construction Activity
CPA	Community Plan Amendment
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSV	Consultant Site Visit Record
CTC	California Transportation Commission
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
DEIR	Draft Environmental Impact Report
DPR	Department of Parks and Recreation

EAS	Environmental Analysis Section
EB	eastbound
EMFAC	emission factors
EO	executive order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
ESL	Environmentally Sensitive Lands
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GHG	greenhouse gas
HPS	high-pressure sodium
HSC	Health and Safety Code
Hz	Hertz
I-	Interstate
in/s	inches per second
Interim Guidance	Local Development – Intergovernmental Review Program Interim Guidance
IPCC	Intergovernmental Panel on Climate Change
ITP	incidental take permit
JURMP	Jurisdictional Urban Runoff Management Program
kHz	kilohertz
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
L_{eq}	equivalent sound level
LID	Low-Impact Development
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service

LPS	low pressure sodium
Lv	vibration velocity level
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendant
MMC	Mitigation Monitoring Coordination
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mph	miles per hour
MPO	Metropolitan Planning Organization
MS4	municipal separate storm sewer system
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NB	northbound
NEPA	National Environmental Policy Act
NO	nitric oxide
NO ₂	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O ₃	ozone

Pb	lead
PDP	Priority Development Project
PEIR	Program Environmental Impact Report
PI	Principal Investigator
PM	particulate matter
PM10	particulate matter 10 micrometers or less in diameter
PM2.5	particulate matter 2.5 micrometers or less in diameter
ppb	parts per billion
ppm	parts per million by volume
PPV	peak particle velocity
PRC	Public Resources Code
precon	preconstruction
proposed project	Serra Mesa Community Plan Amendment Roadway Connection Project
RAQS	Regional Air Quality Strategy
RCEM	Road Construction Emissions Model
RE	Resident Engineer
Regional Plan	San Diego Forward: Regional Plan
Regulations	City of San Diego's Historical Resources Regulations
rms	root-mean-square
ROG	reactive organic gas
RTP	regional transportation plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	southbound
SB	Senate Bill
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin

SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric
SDP	Site Development Permit
SDPD	San Diego Police Department
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SPL	sound pressure level
SR-	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TDS	total dissolved solids
TMDL	Total Maximum Daily Loads
U.S.C.	U.S. Code
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
V/C	volume to capacity
VdB	velocity level decibels
VMT	vehicle miles traveled
WB	westbound
WDR	Waste Discharge Requirement
WQIP	Water Quality Improvement Plan

Executive Summary

This chapter provides a summary of the Draft Environmental Impact Report (DEIR) prepared for the proposed Serra Mesa Community Plan Amendment (CPA) Roadway Connection Project (proposed project), prepared in compliance with the California Environmental Quality Act (CEQA). The City of San Diego (City) is the CEQA Lead Agency for the EIR and, as such, has the primary responsibility for evaluating the environmental effects of the proposed project and considering whether to approve or disapprove the proposed project in light of these effects.

As required by CEQA, this DEIR does the following: (1) describes the proposed project, including its location, objectives, and features; (2) describes the existing conditions at the project site and nearby environs; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur should the proposed project be implemented; (4) identifies feasible means of avoiding or substantially lessening the significant adverse effects; (5) provides a determination of significance for each impact after mitigation is incorporated; and (6) evaluates a reasonable range of feasible alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant impact.

This Executive Summary covers the following topics: (1) Project Description, (2) Areas of Controversy/Issues Raised by Agencies and the Public, (3) Summary of Environmental Impacts, and (4) Project Alternatives.

Project Description

Overview

The proposed project consists of construction and operation of a four-lane major street, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. The proposed project would also require an amendment to the Serra Mesa Community Plan.

The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to Via Alta and Franklin Ridge Road. The project site evaluated throughout this EIR encompasses approximately 2 acres, which includes the area required for construction work and drainage/utility improvements. The proposed roadway itself would cover approximately 1.25 acre. The roadway would include pedestrian walkways/parkways, bicycle lanes, four travel lanes, and a landscaped center median. The proposed project would require two signalized intersections following construction. One signalized intersection would be required at Phyllis Place where the roadway would begin, while the other would be located where the proposed roadway would meet Franklin Ridge Road/Via Alta.

Regarding the proposed community plan amendment, the proposed project would revise text and figures in the Serra Mesa Community Plan to show a street connection from Phyllis Place (in Serra Mesa) southward to the boundary of the Serra Mesa and Mission Valley Community Plan areas. The amendment would result in revisions to all maps of the Serra Mesa Community Plan area, as shown in Appendix A.

Project Location and Setting

The project site is located in the Mission Valley and Serra Mesa communities of the city of San Diego, within San Diego County. The project site is immediately south of Phyllis Place, east of Abbotshill Road, and approximately 0.25 mile west of Interstate 805 (I-805). The project site is located within the boundary of the Quarry Falls site within an undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an active energy transmission line (four transmission towers) running east–west at the northern portion of the project site, adjacent to Phyllis Place. A 20-inch gas transmission pipeline is located underground within the vicinity of the transmission line.

As further detailed in Chapter 3, *Project Description*, a new portion of this gas line would be constructed within the easement to achieve a preferred depth of 3 feet from finished elevation. The area to conduct this work is within the project site. As also detailed in Chapter 3, *Project Description*, a portion of the Phyllis Place Park is located within the project site. The linear park would run along the south side of Phyllis Place. There are two approved general development plans for the park—one with the roadway connection and one without. Under either scenario, however, the park would be 1.33 acres and would be for passive use activities.

Project Objectives

The City has identified the following objectives for the proposed project:

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.
3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

Areas of Known Controversy/Issues Raised by Agencies and the Public

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 section of the EIR. To determine the number, scope, and extent of the environmental topics to be addressed in this DEIR, 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 CPA. The NOP was distributed on January 23, 2012, for a 30-day public review and comment period, and a public scoping meeting was held on February 7, 2012.

Public comments received on the NOP and comments from the scoping meeting reflect the controversy related to several environmental issues to be discussed in the DEIR.

Issues raised in response to the NOP prepared and circulated for this DEIR focus around land use, transportation/circulation, air quality, noise, biological resources, paleontological resources, historical/cultural resources, hydrology and water quality, and visual quality and neighborhood character. Transportation/circulation issues were raised through written comments from the California Department of Transportation (Caltrans), biological resource issues were raised in a letter from the California Department of Fish and Wildlife, and potential health and safety issues were raised in written comments from the California Department of Toxic Substances Control. In addition to written comments received, the City of San Diego held a public scoping meeting where verbal comments were provided concerning land use, transportation/circulation, and biological resource issues as well as noise and visual quality.

Summary of Environmental Impacts

Chapter 5 of this DEIR presents the environmental analysis of the proposed project. Table ES-1 summarizes the significant impacts identified in the environmental analysis for each issue area. Table ES-1 also outlines the mitigation measures proposed to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance.

Based on the analysis presented in Chapter 5, the project would result in significant and unavoidable direct impacts after mitigation related to the topic areas of transportation/circulation (roadway network capacity, planned transportation systems, and traffic hazards). Based on the analysis provided in Chapter 5, the proposed project would result in significant and unavoidable cumulative impacts related to transportation/circulation.

With the implementation of mitigation measures, the proposed project would result in less-than-significant impacts for the issue areas of noise (construction noise), biological resources (sensitive species and sensitive vegetation communities), historical resources (historical resources, religious/sacred uses, and tribal cultural resources), and visual effects/neighborhood character (landform alteration). Impacts were determined to be less than significant for the issue areas of land use, air quality, paleontological resources, hydrology and water quality, and greenhouse gas (GHG) emissions. Other issue areas that were determined to be not significant are analyzed in Chapter 7, *Effects Found Not To Be Significant*.

Summary of Project Alternatives

The State CEQA Guidelines require that an EIR present a range of reasonable alternatives to a project, or to the location of a project, that could feasibly attain the majority of the basic project objectives but that would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are not feasible, or do not avoid or substantially lessen any significant

environmental effects (State CEQA Guidelines, Section 15126.6(c)). In addition to the requirements described above, CEQA requires the evaluation of a No Project Alternative, which analyzes the environmental effects that would occur if the project were not to proceed (State CEQA Guidelines Section 15126.6(e)). Moreover, the EIR is required to identify the environmentally superior alternative. When the environmentally superior alternative is the No-Project Alternative, CEQA requires that another alternative be identified. The environmentally superior alternative cannot be the No Project Alternative.

Alternative 1 – No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. The No Project Alternative assumes that the proposed roadway connection and associated CPA to the Serra Mesa Community Plan would not occur. As such, the inconsistency between the Mission Valley and Serra Mesa Community Plan would remain, and any future proposal for a road connection would require an amendment to the Serra Mesa Community Plan.

Section 15126.6(e)(3) of the State CEQA Guidelines states that the no project analysis shall discuss what would be reasonably 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. As further detailed in Chapter 3, *Project Description*, the northernmost portion of the project site (immediately south of Phyllis Place) is likely to be developed as a park if the proposed project were not to be implemented. There are two approved general development plans for the Phyllis Place Park—one with the proposed roadway and one without. Although a subsequent action to obtain a notice to proceed or grading permit may be required, the park was approved as part of the Quarry Falls Specific Plan and has conceptual design plans, grading plans, etc. Therefore, it is reasonable to assume that a portion of the site would be developed going forward under the No Project Alternative. The remaining portion of the project site is designated as “Open Space” within the Quarry Falls Specific Plan. Therefore, it is reasonable to assume that no other development within this portion of the project site would occur under the No Project Alternative.

Compared to the proposed project, the No Project Alternative would result in greater impacts on land use, transportation and circulation, air quality, and GHG emissions due to the increase in regional and study area vehicle miles traveled (VMT). This alternative would result in similar impacts to paleontological resources. The No Project Alternative would reduce impacts on noise/vibration, biological resources, historical resources, hydrology/water quality, and visual effects.

Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

The Bicycle, Pedestrian, and Emergency Access Only Alternative would provide a narrower roadway design as it would not allow vehicle traffic aside from emergency responders. It would also provide access for pedestrians and cyclists. The roadway design would include bollards, gates, or another type of control subject to the approval of the San Diego Fire and Police Departments. The final width of the roadway design and type of control would be determined in conjunction with these departments. However, for the purposes of analysis, it can reasonably be concluded that the

roadway would be narrower than the proposed project (120 feet wide), as it would only be required to include a bollard/gate and an entry on either side for pedestrians and cyclists. Due to the reduced width, it is also reasonable to assume that the construction schedule would be shorter for this alternative when compared to the proposed project. This alternative would still require an amendment to the Serra Mesa Community Plan as it currently does not provide for any roadway connection.

The Bicycle, Pedestrian, and Emergency Access Only Alternative would result in greater impacts on land use, transportation and circulation, air quality, and GHG emissions due to the increase in regional and study area VMT. This alternative would result in similar impacts to paleontological resources. The Bicycle, Pedestrian, and Emergency Access Only Alternative would slightly reduce impacts on noise/vibration, biological resources, historical resources, hydrology/water quality, and visual effects.

Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. When the environmentally superior alternative is the No-Project Alternative, CEQA requires that another alternative be identified. As further detailed in Chapter 9, *Alternatives*, the No-Project Alternative reduces impacts within several issue areas—such as biological resources, historical/tribal cultural resources, and visual effects—and is therefore identified as the environmentally superior alternative. It should be noted, however, that these impacts would be mitigated to less-than-significant levels under the proposed project.

As the No-Project Alternative is identified as the environmentally superior alternative, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior build alternative. It would slightly reduce impacts associated with construction (i.e., biological resources, historical and tribal cultural resources) due to the narrower roadway and shorter duration of construction.

It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions.

Table ES-1. Summary of Significant Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
5.2 Transportation and Circulation				
Near-Term Scenario (Year 2017)				
Roadway Capacity (Roadway Segments)	Impact TRAF-1: The proposed project would result in a significant impact at the segment of Murray Ridge Road from Mission Center Road to Pinecrest Avenue because it would increase the volume-to-capacity (V/C) ratio by 0.08, which exceeds the City's threshold of 0.01 for roadway segments operating at level of service (LOS) F.	Potentially Significant	MM-TRAF-1: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Mission Center Road to Pinecrest Avenue to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.	Significant and Unavoidable ¹
	Impact TRAF-2: The proposed project would result in a significant impact per the City's thresholds at the segment of Murray Ridge Road from Pinecrest Avenue to Sandroek Road because it degrades the LOS from D to E.	Potentially Significant	MM-TRAF-2: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Pinecrest Avenue to Sandroek Road to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.	Significant and Unavoidable ¹
	Impact TRAF-3: The proposed project would result in a significant impact per the City's thresholds at the segment of Phyllis Place from Franklin Ridge Road to I-805 southbound (SB) ramp because it degrades the LOS to F from A.	Potentially Significant	MM-TRAF-3: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be widened from Franklin Ridge Road to I-805 SB ramps to accommodate five total lanes (three EB and two WB), including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.	Less than Significant
	Impact TRAF-4: The proposed project would result in a significant impact per the City's thresholds at the segment of Phyllis Place from I-805 SB ramp to I-805 northbound (NB) ramp because it degrades the LOS to F from D.	Potentially Significant	MM-TRAF-4: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. The new classification for this segment of Phyllis Place will be a four-lane Collector.	Less than Significant

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Roadway Capacity (Intersections)	Impact TRAF-5: The proposed project would result in a significant impact per the City's thresholds at the Murray Ridge Road and I-805 NB ramps in the PM peak hour because it would worsen the delay and degrade the LOS to E from B.	Potentially Significant	MM-TRAF-5: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, <u>in coordination with Caltrans</u> , the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.	Less than Significant
	Impact TRAF-6: The proposed project would result in a significant impact per the City's thresholds at the Murray Ridge Road and I-805 SB ramps in the PM peak hour because it would worsen the delay and degrade the LOS to F from C.	Potentially Significant	MM-TRAF-6: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.	Less than Significant
	Impact TRAF-7: The proposed project would result in a significant impact per the City's thresholds at the Qualcomm Way and Friars Road westbound (WB) ramps in the PM peak hour because it would worsen the delay and degrade the LOS to E from D.	Potentially Significant	MM-TRAF-7: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the Qualcomm Way and Friars Road WB ramps intersection shall be reconfigured with the following improvements: the SB approach shall be widened to accommodate two through lanes and one exclusive right-turn lane; the NB approach shall be restriped to accommodate two through lanes and two left-turn lanes; and the WB on-ramp shall be widened to accommodate two receiving lanes.	Less than Significant
Long-Term Scenario (Year 2035)				
Planned Circulation System (Roadway Segments)	Impact TRAF-8: The proposed project would result in a significant impact per the City's thresholds at the segment of Franklin Ridge Road from Via Alta to Civita Boulevard because it degrades the LOS to F from C.	Potentially Significant	MM-TRAF-8: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Franklin Ridge Road shall be widened to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Franklin Ridge Road would be a four-lane Collector.	Significant and Unavoidable ²

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact TRAF-9: The proposed project would result in a significant impact per the City's thresholds at the segment of Murray Ridge Road from Mission Center Road to Pinecrest Avenue because it would increase the V/C ratio by 0.08, which exceeds the City's threshold of 0.01 for roadway segments operating at LOS F.	Potentially Significant	MM-TRAF-9: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road from Mission Center Road to Pinecrest Avenue shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.	Significant and Unavoidable ¹
	Impact TRAF-10: The proposed project would result in a significant impact per the City's thresholds at the segment of Murray Ridge Road from Pinecrest Avenue to Sandrock Road because it would increase the V/C ratio by 0.053, which exceeds the City's threshold of 0.01 for roadway segments operating at LOS F.	Potentially Significant	MM-TRAF-10: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.	Significant and Unavoidable ¹
	Impact TRAF-11: The proposed project would result in a significant impact per the City's thresholds at the segment of Phyllis Place from Franklin Ridge Road to I-805 SB ramp because it degrades the LOS to F from an existing LOS A.	Potentially Significant	MM-TRAF-11: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from Franklin Ridge Road to I-805 SB ramp shall be reconfigured <u>widened</u> to accommodate five total lanes (three EB and two WB), including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.	Less than Significant

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact TRAF-12: The proposed project would result in a significant impact per the City's thresholds at the segment of Phyllis Place from I-805 SB ramp to I-805 NB ramp because it degrades the LOS to F from E.	Potentially Significant	MM-TRAF-12: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from I-805 SB ramp to I-805 NB ramp shall be restriped to accommodate five total lanes. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.	Less than Significant
	Impact TRAF-13: The proposed project would result in a significant impact per the City's thresholds at the segment of Rio San Diego Drive from Qualcomm Way to Rio Bonito Way because it would increase the V/C ratio by 0.031, which exceeds the City's threshold of 0.01 for roadway segments operating at LOS E.	Potentially Significant	MM-TRAF-13: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the segment of Rio San Diego Drive from Qualcomm Way to Rio Bonito Way shall be reconfigured to include the necessary median commensurate with a four-lane Major Arterial.	Significant and Unavoidable ³
Planned Circulation System (Intersections)	Impact TRAF-14: The proposed project would result in a significant impact per the City's thresholds at the intersection of Murray Ridge Road and Sandrock Road in the PM peak hour because it would worsen the delay and degrade the LOS to E from B.	Potentially Significant	MM-TRAF-14: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the left-turn lanes in both the NB and SB directions will allow both through movements and left turns.	Significant and Unavoidable ⁴
	Impact TRAF-15: The proposed project would result in a significant impact per the City's thresholds at the intersection of Murray Ridge Road and I-805 NB ramps in the PM peak hour because it would worsen the delay and degrade the LOS to F from D.	Potentially Significant	MM-TRAF-15: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.	Significant and Unavoidable ⁵

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Impact TRAF-16: The proposed project would result in a significant impact per the City's thresholds at the intersection of Murray Ridge Road and I-805 SB ramps in the AM and PM peak hour because it would worsen the delay and degrade the LOS to E in the AM peak hour and to F in the PM peak hour.	Potentially Significant	MM-TRAF-16: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.	Significant and Unavoidable ⁵
	Impact TRAF-17: The proposed project would result in a significant impact per the City's thresholds at the intersection of Via Alta and Franklin Ridge Road in the PM peak hour because it would worsen the delay and degrade the LOS to F from B.	Potentially Significant	MM-TRAF-17: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the EB through/right-turn lane will be converted to a left/through/right-turn lane to account for additional EB to NB traffic.	Less than Significant
	Planned Circulation System (Freeway Ramp Meters)	Potentially Significant	MM-TRAF-18: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the applicant shall contribute a fair share contribution, in coordination with Caltrans, which would be applied toward an additional regular traffic ramp lane on the I-805 SB on-ramp from Murray Ridge Road.	Less than Significant
Traffic Hazards	Impact TRAF-19: The proposed project would require a signalized intersection along Phyllis Place, which would in turn result in possibly unsafe conditions for motorists entering or exiting the City View Church parking lot as the driveway would be approximately 150 feet east of the signalized intersection.	Potentially Significant	MM-TRAF-19: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the City View Church driveway shall be relocated as part of the four-way intersection design with the proposed roadway connection and Phyllis Place.	Significant and Unavoidable ⁶

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
5.4 Noise				
Construction Noise Levels	Impact NOI-1: Noise from project construction activities would be temporary and would cease at the completion of construction. However, significant impacts could result if construction occurs outside of the hours permitted by the City's Noise Ordinance or at any time within 65 to 125 feet (depending on the phase of construction within the Quarry Falls site) of occupied residences.	Potentially Significant	<p>MM NOI-1: All construction and general maintenance activities, except in an emergency, shall be limited to the days and hours permitted in Section 59.5.0404 of the City of San Diego Municipal Code. Outside of these hours, construction personnel shall not be permitted on the job site, and material or equipment deliveries and collections shall not be permitted. The construction contractor shall develop and implement a noise control plan that demonstrates to the City's satisfaction that the Noise Ordinance standard would not be exceeded. The plan may include the following.</p> <ul style="list-style-type: none"> • All construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. • All mobile or fixed construction equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity. • All construction equipment shall be properly maintained. • All construction equipment shall be operated only when necessary and shall be switched off when not in use. • Construction employees shall be trained in the proper operation and use of the equipment. • Electrical power from the local power grid (as opposed to onsite generators) shall be used to the maximum 	Less than Significant

extent feasible to run compressors, power tools, and similar equipment.

- Stationary equipment, such as generators or compressors, shall be located as far as feasible from noise-sensitive receptors.
 - Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
 - Construction site speed limits shall be established and enforced during the construction period.
 - The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
 - Temporary construction noise barriers shall be installed as necessary to adequately control noise levels. Barriers may be constructed around specific equipment items or larger work areas as required. Barriers shall be constructed of materials with a minimum sound transmission class (STC) rating of 25 (sound absorptive acoustical panels, acoustical blankets, etc.).
 - The project developer and/or its contractor shall prominently post signage at the north and south ends of the project site in a highly visible location, not less than 72 hours prior to the start of any construction activity using heavy construction equipment (e.g., graders, dozer, backhoes). These two signs shall provide the project name, indicate the anticipated dates of construction, and advise that there will be loud noise associated with some construction activities. The signage shall provide a telephone contact number for affected parties to ask questions and/or relay concerns. This signage shall either consist of stand-alone signs or be combined with any other project-related signage at the project boundary, but shall be clearly visible from outside the project site. The project developer shall include this measure in the construction specification documents for the project. Prior to the commencement of heavy construction activities, the project developer and/or its contractor shall submit documentation
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Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
(including photographs) to the City demonstrating compliance with this measure.				
5.5 Biological Resources				
Sensitive Species	Impact BIO-1: Construction of the proposed project could result in direct impacts on sensitive species that have moderate potential to utilize the disturbed coastal sage scrub on-site. Construction activities would also have the potential to result in significant indirect impacts on raptors or other migratory birds if the species nests in trees adjacent to the project site.	Potentially Significant	MM-BIO-1: Biological resource protection measures during construction: I. Prior to Construction A. Biologist Verification –The owner/permittee shall provide a letter to the City’s Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist), as defined in the City of San Diego’s Biological Guidelines (2012), has been retained to implement the project’s biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project. B. Preconstruction Meeting – The Qualified Biologist shall attend the preconstruction meeting, discuss the project’s biological monitoring program, and arrange to perform any follow-up mitigation measures and reporting, including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage. C. Biological Documents – The Qualified Biologist shall submit all required documentation to MMC, verifying that any special mitigation reports, including, but not limited to, maps, plans, surveys, survey timelines, or buffers, are completed or scheduled per City Biology Guidelines, the Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions, California Environmental Quality Act (CEQA), endangered	Less than Significant

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- species acts (ESAs), and/or other local, state or federal requirements.
- D. BCME – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) that includes the biological documents in C, above. In addition, include the following: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, barrel cactus recovery and relocation, burrowing owl exclusions), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements – To avoid any direct impacts on sensitive, MSCP-covered, listed, threatened, or endangered species, or species in the list of raptors provided on page 12 (Restrictions on Grading) of the Biology Guidelines, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the established breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The
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applicant shall submit the results of the pre-construction survey to City MMC for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow-up surveys, monitoring schedules, construction barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. Resource Delineation – Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
 - G. Education – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive
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plants, and acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. Monitoring – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed, as shown in “Exhibit A” and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. If barrel cactus are identified during construction, they shall be recovered and relocated off the project site to a suitable location. In addition, the Qualified Biologist shall document field activity through the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. Subsequent Resource Identification – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on-site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly affect the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post-Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, CEQA, and other applicable local, state and
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Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.	
Sensitive Habitat	Impact BIO-2: The proposed project would directly impact (both temporarily and permanently) a total of approximately 0.25 acre of coastal sage scrub habitat, a Tier II habitat. Impacts would occur outside the MHPA; therefore, in accordance with the City's Biology Guidelines, a 1:1 mitigation ratio would be required if mitigation occurs within the MHPA, for a total of 0.25 acre. If mitigation is proposed outside the MHPA, a mitigation ratio of 1.5:1 would be required for a total of 0.38 acre.	Potentially Significant	MM-BIO-2: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, evidence shall be provided that demonstrates a total of 0.25 acre of credit from the San Diego Habitat Acquisition Fund or another approved mitigation bank (such as Marron Valley) has been acquired to mitigate the loss of disturbed coastal sage scrub (Tier II).	Less than Significant
5.7 Historical Resources				
Historical Resources, Sacred/ Religious Uses, Tribal Cultural Resources	Impact HIS-1: Although no historical (archaeological) or tribal cultural resources were identified within the project site, the project would have the potential to disturb or alter subsurface resources during construction-related activities.	Potentially Significant	MM-HIST-1: I. Prior to Permit Issuance (for projects that include ground disturbance) A. Entitlements Plan Check 1. Prior to issuance of any construction permits including, but not limited to, the first Grading Permit, Demolition Plans/Permits, and Building Plans/Permits, but prior to the first preconstruction (precon) meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for archaeological monitoring and Native American (Kumeyaay) monitoring have been noted on the applicable construction documents through the plan check process.	Less than Significant

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>B. Letters of Qualification Have Been Submitted to ADD</p> <ol style="list-style-type: none"> 1. The project's cultural resources consultant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines. If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour Hazardous Waste Operations and Emergency Response training with certification documentation. 2. MMC would provide a letter to the project's cultural resources consultant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the Historical Resources Guidelines. 3. Prior to the start of work, the project's cultural resources must obtain written approval from MMC for any personnel changes associated with the monitoring program. <p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to MMC that a site-specific records search(quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from SCIC, or, if the search was in-house, a letter of verification 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>from the PI stating that the search was completed.</p> <ol style="list-style-type: none"> 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the quarter-mile radius. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring; the City shall arrange a precon meeting that shall include the PI, Native American (Kumeyaay) consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American (Kumeyaay) monitor shall attend any grading/excavation-related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor. <ol style="list-style-type: none"> a. If the PI is unable to attend the precon meeting, the City shall schedule a focused precon meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to Be Monitored <ol style="list-style-type: none"> a. Prior to the start of any work that requires monitoring, the PI shall submit 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American (Kumeyaay) consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11 inches x 17 inches) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits.</p> <p>b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring would occur.</p> <p>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents that indicate site conditions such as depth of excavation and/or site graded to bedrock, etc. that may reduce or increase the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor(s) Shall Be Present during Grading/Excavation/Trenching</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ol style="list-style-type: none"> 1. The Archaeological Monitor shall be present full time during all soil-disturbing and grading/excavation/ trenching activities that could result in impacts on archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the AME. 2. Native American (Kumeyaay) consultant/monitor shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American (Kumeyaay) consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Sections III.B–C and IV.A–D shall commence. 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition—such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or encountering of native soils—that may reduce or increase the potential for resources to be present occurs. 4. The Archaeological Monitor and Native American (Kumeyaay) consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>CSVs shall be faxed or emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</p> <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities including, but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. <p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI and Native American (Kumeyaay) consultant/monitor, where Native American resources are discovered, shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section IV below. 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program that has been reviewed by the Native American (Kumeyaay) consultant/monitor, and obtain written approval from MMC. Impacts on significant resources must be mitigated before ground-disturbing activities in the area of discovery would be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA, then the limits on the amount(s) that the project may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply. c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts would be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off site until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), California PRC (Section 5097.98), and State HSC (Section 7050.5) shall be undertaken:</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> A. Notification <ul style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC would notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process. 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone. B. Isolate Discovery Site <ul style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains. 2. The Medical Examiner, in consultation with the PI, would determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner would determine with input from the PI whether the remains are, or are most likely to be, of Native American origin. C. If Human Remains Are Determined to Be Native American <ul style="list-style-type: none"> 1. The Medical Examiner would notify the NAHC within 24 hours. By law, only the Medical Examiner can make this call. 2. The NAHC would immediately identify the person or persons determined to be the MLD and provide contact information. 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ol style="list-style-type: none"> 3. The MLD would contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California PRC, and HSC. 4. The MLD would have 48 hours to make recommendations to the City or representative for the treatment or disposition, with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American human remains would be determined between the MLD and the PI, and, if: <ol style="list-style-type: none"> a. The NAHC is unable to identify the MLD, or the MLD failed to make a recommendation within 48 hours after being notified by the Commission, or; b. The City or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the City, then, c. In order to protect these sites, the City shall do one or more of the following: <ol style="list-style-type: none"> 1) Record the site with the NAHC; 2) Record an open space or conservation easement on the site; or 3) Record a document with the County. d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the City may agree that 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and cultural materials buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.</p> <p>D. If Human Remains Are Not Native American</p> <ol style="list-style-type: none"> 1. The PI shall contact the Medical Examiner with notification of the historic era context of the burial. 2. The Medical Examiner would determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for interment of the human remains shall be made in consultation with MMC, EAS, any known descendant group, and the San Diego Museum of Man. <p>V. Night and/or Weekend Work</p> <p>A. If Night and/or Weekend Work Is Included in the Contract</p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>and timing shall be presented and discussed at the precon meeting.</p> <p>2. The following procedures shall be followed.</p> <p>a. No Discoveries</p> <p>In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax or email by 8 a.m. of the next business day.</p> <p>b. Discoveries</p> <p>All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.</p> <p>c. Potentially Significant Discoveries</p> <p>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Sections III – During Construction and IV – Discovery of Human Remains shall be followed.</p> <p>d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If Night and/or Weekend Work Becomes Necessary during the Course of Construction</p> <p>1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> 2. The RE, or BI, as appropriate, shall notify MMC immediately. C. All Other Procedures Described Above Shall Apply, as Appropriate 	
			<ul style="list-style-type: none"> VI. Post Construction <ul style="list-style-type: none"> A. Preparation and Submittal of Draft Monitoring Report <ul style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines, that describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results, or other complex issues, a schedule shall be submitted to MMC establishing agreed-upon due dates and the provision for submittal of monthly status reports until this measure can be met. <ul style="list-style-type: none"> a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation (DPR) c. The PI shall be responsible for recording (on the appropriate State of California 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the SCIC with the Final Monitoring Report.</p> <ol style="list-style-type: none"> 2. MMC shall return the Draft Monitoring Report to the PI for revision or for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. <p>B. Handling of Artifacts</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. <p>C. Curation of Artifacts: Accession Agreement and Acceptance Verification</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, 	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>testing, and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American (Kumeyaay) representative, as applicable.</p> <p>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</p> <p>3. When applicable to the situation, the PI shall include written verification from the Native American (Kumeyaay) consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.</p> <p>D. Final Monitoring Report(s)</p> <p>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</p> <p>2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC that includes the</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Acceptance Verification from the curation institution.				
5.9 Visual Effects and Neighborhood Character				
Landform Alteration	The project site is on a steep hillside with natural gradients equal to or in excess of 25% and is, therefore, subject to the City's ESL regulations. As discussed in Chapter 3, <i>Project Description</i> , the proposed project would entail 43,500 cubic yards of fill and 0 yards of cut. The maximum fill would be approximately 46 feet. Therefore, the project would alter more than 2,000 cubic yards of earth per graded acre and/or result in a change in elevation of a steep hillside from existing grade to proposed grade of more than 5 feet. As such, the proposed project would result in a potentially significant impact.	Potentially Significant	<p>MM-VIS-1: Prior to issuance of grading permits, the project applicant shall implement design features and grading techniques specific to the alteration of the hillside. The grading plans shall be subject to the review and approval by the City prior to issuance of a grading permit. The grading plans shall clearly demonstrate, with both spot elevations and contours, that:</p> <ol style="list-style-type: none"> 1) The proposed landforms shall very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This can be achieved through "naturalized" variable slopes. 2) The proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations. 3) The gradient of the slopes will be varied rather than left at a constant angle in order to create a more natural appearance. 4) Natural landform plantings are incorporated to soften the appearance of manufactured slopes. 	Less than Significant

NOTES:

¹ Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

² Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway would provide Class II bikeways and a 6-foot-wide sidewalk, separated from the street by an 8-foot-wide parkway; some of these amenities would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
³ Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This segment of the roadway is likely to be reclassified as a four-lane Major Arterial as part of the forthcoming update to the Mission Valley Community Plan, which in turn may require a median or other reconfiguration in order to meet that classification. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.				
⁴ Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. Currently the intersection geometry provides for bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.				
⁵ Mitigation identified would not reduce the delay at this intersection to an acceptable LOS per the City's thresholds, and is therefore considered partial mitigation.				
⁶ Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. The City View Church is a privately owned property. The relocation of the driveway may in turn require the removal of trees and the reconfiguration of other internal access considerations within the Church property, such as the drop-off area in front of the church that is connected to the existing driveway. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.				

Chapter 1

Introduction

This recirculated Draft Environmental Impact Report (DEIR) for the proposed Serra Mesa Community Plan Amendment (CPA) Roadway Connection Project (proposed project) has been prepared by the City of San Diego (City) in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.). The DEIR has also been prepared in accordance with the City's Environmental Impact Report Guidelines (City of San Diego 2005) and the CEQA Significance Determination Thresholds (City of San Diego 2016). This DEIR evaluates the potential direct, indirect, and cumulative environmental impacts of the proposed project. The proposed project is fully detailed in Chapter 3, *Project Description*, of this DEIR. This section provides an overview of the environmental review process and requirements of CEQA.

1.1 Purpose of CEQA and the EIR

CEQA was enacted by the California legislature in 1970. As noted under State CEQA Guidelines Section 15002, CEQA has four basic purposes.

1. Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities.
2. Identify the ways in which environmental damage can be avoided or significantly reduced.
3. Prevent significant, avoidable 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.
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

An EIR is an informational document, the purpose of which is to inform members of the public and agency decision-makers of the significant environmental effects of a proposed project, identify feasible ways to reduce the significant effects of the proposed project, and describe a reasonable range of feasible alternatives to the project that would reduce one or more significant effects and still meet the proposed project's objectives. In instances where significant impacts cannot be avoided or mitigated, the proposed project may nonetheless be carried out or approved if the approving agency finds that economic, legal, social, technological, or other benefits outweigh the unavoidable significant environmental impacts.

1.2 Intended Uses of this EIR

This section discusses the intended uses for this DEIR. Environmental review and consultation requirements under federal, state, or local laws, regulations, or policies that are in addition to CEQA are discussed in the applicable individual resource sections within Chapter 5, *Environmental Analysis*, of this DEIR.

The City is the CEQA lead agency, as defined under State CEQA Guidelines Section 15050, because it has principal responsibility for carrying out and approving the proposed project. As the lead agency, the City also has primary responsibility for complying with CEQA. As such, the City has analyzed the environmental effects of the proposed project; the results of that analysis are presented in this DEIR. The City Council, in its role as the decision-making body of the City, is responsible for certifying the Final EIR and approving the Findings of Fact and Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines prior to project approval. Responsible agencies, as defined pursuant to State CEQA Guidelines Section 15381, are public agencies that may have discretionary approval authority for a project, and for the proposed project includes the California Department of Transportation (Caltrans). As detailed further in Section 5.2, *Transportation and Circulation*, the project would require mitigation for impacts on the circulation network that would affect freeway ramps, which are under the jurisdiction of Caltrans. Table 1-1 provides a summary list of the approvals and permits that would be required.

Table 1-1. List of Required Discretionary Actions

Discretionary Action	City Council
Certification of Final EIR	X
Adoption of Mitigation Monitoring and Reporting Program	X
Adoption of Findings of Fact	X
Adoption of Statement of Overriding Considerations	X
Approval and Adoption of the project and CPA	X

1.3 Scope and Content of this EIR

1.3.1 Notice of Preparation and Scoping Period

In compliance with Section 15082 of the State CEQA Guidelines, the City Development Services Department circulated the Notice of Preparation (NOP), dated January 23, 2012, to interested agencies, groups, and individuals. The 30-day public scoping period ended February 21, 2012. In addition, a public scoping meeting was held on February 7, 2012, at the Serra Mesa Branch Library to gather additional public input. The scope of analysis for the DEIR was determined by the public responses to the NOP and in conjunction with City staff. In addition, comments received during the NOP public scoping meetings were considered during the preparation of this DEIR. The NOP and Scoping Letter comments are included as Appendix A of this DEIR.

1.3.2 Environmental Analysis Content

Based on the scope of analysis for this DEIR, the following issues were determined to be potentially significant and are therefore addressed in Chapter 5, *Environmental Analysis*, of this document:

- Land Use
- Traffic and Transportation
- Air Quality

- Noise
- Biological Resources
- Paleontological Resources
- Hydrology and Water Quality
- Historical Resources
- Visual Quality and Neighborhood Character
- Greenhouse Gas Emissions

Comment letters received during the NOP public scoping period expressed concern about traffic, noise, air quality and greenhouse gas emissions, and neighborhood character. These concerns have been identified as areas of known controversy and are analyzed in Chapter 5, *Environmental Analysis*, and Chapter 6, *Cumulative Impacts*, of this DEIR. Additional CEQA-mandated environmental topics, such as Agricultural and Forestry Resources, Energy, Mineral Resources, Population and Housing, Recreation, Geology and Soils, Health and Safety, Public Services, and Public Utilities are addressed in Chapter 7, *Effects Not Found To Be Significant*, of this DEIR.

1.4 Availability of this EIR

This DEIR was made available for review by members of the public and public agencies for 45 days (March 29, 2017 to May 15, 2017) to provide comments on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the proposed project might be avoided or mitigated.

Hard copies of the DEIR were also available to review at the following location:

City of San Diego, Planning Department
1010 2nd Avenue, Eleventh Floor
San Diego, California 92101-4153

Compact discs (CDs) with an electronic version of the DEIR were available to review at the following locations:

Serra Mesa-Kearny Mesa Library
9005 Aero Drive
San Diego, California 92123

Mission Valley Library
2123 Fenton Parkway
San Diego, California 92108

Downtown San Diego Public Library
330 Park Boulevard
San Diego, California 92101

The Notice of Availability of the DEIR was mailed as required by the State CEQA Guidelines and the City. As detailed in the Public Notice of Availability for Recirculation included as a preface to this DEIR, comments previously received on the prior Program EIR were considered, will be included as

part of the administrative record, and are factored into the decision to revise and recirculate this DEIR. ~~As such~~ As a consequence of the comments received, the previous program analysis was completely overhauled and a new project-level analysis was undertaken. Because the changes to the previous Program EIR were comprehensive and substantial to the point where the previous Program EIR is no longer present, and because the changes were made to be responsive to the public comments received, the City will only be directly responding to new written comments received on this DEIR in making its decision to certify it as complete and in compliance with CEQA, and also whether to approve or deny the proposed project. In the final review, environmental considerations and economic and social factors will be weighed to determine the most appropriate course of action. The City will use the Final Environmental Impact Report (FEIR) and supporting documentation in its decision to approve or deny the proposed project.

1.5 Incorporation by Reference in this EIR

As detailed in Section 15150 of the State CEQA Guidelines, an EIR may incorporate by reference all or portions of another document that is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR. It also states that the document be made available to the public for inspection at a public place. Finally, Section 15150 states that the relationship between the incorporated part of the referenced document and the EIR be described and that incorporation by reference is most appropriate for including lengthy materials that provide general background but do not contribute directly to the analysis of the problem at hand.

As further detailed in Chapter 3, *Project Description*, the Quarry Falls Program EIR (PEIR) is incorporated by reference throughout this DEIR and available for review at the City's website;¹ a hard copy is available at the City Planning Department.² The State Clearinghouse number for the Quarry Falls PEIR is 2005081018.

The Quarry Falls PEIR is incorporated by reference because the project site is partially within the Quarry Falls site, and the PEIR provides a detailed overview of the Quarry Falls project,³ which is currently under construction (and some portions have been constructed and occupied). Section 3.3, *Project Background*, provides further information on the background of the proposed project and its relationship to the Quarry Falls project.

1.6 Organization of this EIR

The content and format of this DEIR are designed to meet the requirements of CEQA and State CEQA Guidelines Article 9. Table 1-2 summarizes the organization and content of the DEIR.

¹ <https://www.sandiego.gov/planning/programs/ceqa>

² 1010 Second Avenue, Suite 1200, East Tower, M.S. 413, San Diego, CA 92101

³ The Quarry Falls Project is now called Civita; however, for the purposes of this EIR and consistency, the project will be referred to as "Quarry Falls" throughout because of the numerous references to the Quarry Falls PEIR.

Table 1-2. Document Organization and CEQA Requirements

DEIR Chapter	Contents
Summary	Includes a brief summary of the proposed project; identifies each significant effect, including proposed mitigation measures and alternatives to reduce or avoid the effect; identifies the areas of controversy known to the lead agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects (State CEQA Guidelines Section 15123).
Chapter 1 Introduction	Discusses the purpose of CEQA and this DEIR, the scope and content of this DEIR, the organization of this DEIR, and the intended uses for this DEIR (State CEQA Guidelines Section 15124(d)).
Chapter 2 Environmental Setting	Describes the overall existing physical conditions in the vicinity of the proposed project when the analysis was initiated. In addition, the specific existing conditions for each resource area are described in the applicable resource section in Chapter 5, <i>Environmental Analysis</i> (State CEQA Guidelines Section 15125).
Chapter 3 Project Description	Contains both a map of the precise location and boundaries of the proposed project and its location relative to the region, lists the proposed project's central objectives and underlying purpose, and provides a detailed description of the proposed project's characteristics (State CEQA Guidelines Section 15124(a), (b), and (c)).
Chapter 4 History of Project Changes	Provides a brief overview of minor changes to the project.
Chapter 5 Environmental Analysis	Describes the existing physical conditions for each resource area, lists the applicable laws and regulations germane to the specific resource, describes the impact assessment methodology, lists the criteria for determining whether an impact is significant, identifies the direct and indirect significant impacts that would result from implementation of the proposed project, and lists feasible mitigation measures that would eliminate or reduce the identified significant impacts (State CEQA Guidelines Sections 15125–15126.4).
Chapter 6 Cumulative Impacts	Defines the cumulative study area for each resource; identifies past, present, and reasonably foreseeable future projects with related impacts within each study area; and evaluates the contribution of the proposed project to a cumulatively significant impact. This chapter also lists feasible mitigation measures that would eliminate or reduce the identified significant cumulative impacts (State CEQA Guidelines Section 15130).
Chapter 7 Effects Not Found To Be Significant	Provides a discussion of the environmental resource impacts that were found to be not significant during preparation of this DEIR (State CEQA Guidelines Section 15128).
Chapter 8 Mandatory Discussion Areas	Discusses the way the proposed project could foster economic or population growth, either directly or indirectly, in the surrounding environment; describes the significant irreversible changes associated with the proposed project's implementation (State CEQA Guidelines Sections 15126.2(c) and (d) and 15127).

DEIR Chapter	Contents
Chapter 9 Alternatives to the Proposed Project	Describes a reasonable range of alternatives to the proposed project, including the No-Project Alternative; compares and contrasts the significant environmental impacts of alternatives to the proposed project; and identifies the environmentally superior alternative (State CEQA Guidelines Section 15126.6).
Chapter 10 Preparers of this Report	Lists the individuals and agencies involved in preparing this DEIR (State CEQA Guidelines Section 15129).
Chapter 11 References	Provides a comprehensive listing by chapter of all references cited in this DEIR (State CEQA Guidelines Section 15148).

Chapter 2

Environmental Setting

This chapter provides a description of the overall physical environmental conditions of the project site, from both a local and regional perspective. Resource-specific existing conditions are provided within each individual resource section of Chapter 5, *Environmental Analysis*.

CEQA generally requires disclosure of the environmental setting as it was at the time the Notice of Preparation was published,¹ which for the proposed project was January 23, 2012. As further detailed in this section and in Chapter 3, *Project Description*, a portion of the project site is within the Quarry Falls site. The Quarry Falls project was approved in 2008 and has been in various phases of construction since that time. In the time between the Notice of Preparation being released in 2012 and the preparation of the other technical studies for this DEIR in April 2015, the City elected to conduct updates to resource areas that might have changed substantially during that time. As such, the Biological Resources Technical Report, Noise Technical Report, and Traffic Impact Study were completed in 2015. The geological conditions on site did not change; therefore, the Geologic Reconnaissance prepared for the DEIR in 2013 remains valid.

As further detailed in Section 5.2, *Transportation and Circulation*, traffic counts were collected in 2011 and verified in 2013, to represent the existing conditions. The existing conditions are detailed for informational purposes in Section 5.2, *Transportation and Circulation*, as well as under the other issue areas that rely on traffic data in order to determine impacts—including Sections 5.3, *Air Quality*, 5.4, *Noise*, and 5.10, *Greenhouse Gases*. However, impacts are not determined by comparing the project to the existing condition. Rather, the impact analysis utilizes traffic conditions modeled for the Near-Term Scenario (Year 2017) as the baseline for comparing potential traffic impacts associated with the proposed project because it represents the anticipated opening year for the proposed project. As such, modeled traffic conditions for the Near-Term Scenario would provide a more accurate representation of the direct traffic impacts of the proposed project because they take into account development that has occurred since traffic counts were taken in 2013. Accordingly, traffic conditions for the Near-Term Scenario are considered the near-term baseline conditions for CEQA purposes and are used as a basis for comparison of project-related traffic impacts. The same approach is used for issues within Sections 5.3, *Air Quality*, 5.4, *Noise*, and 5.10, *Greenhouse Gases*, where the analysis relies on traffic data.

In summary, the physical existing conditions that represent the environmental setting discussed below are from 2015. There is the possibility that other uses within the Quarry Falls site have been constructed during the time this DEIR was being prepared. Where necessary, this DEIR analyzes reasonably foreseeable uses that have been approved within the Quarry Falls Program EIR (PEIR). For example, low- to medium-density residential uses are planned in the vicinity of the project site.

¹ Section 15125 of the State CEQA Guidelines states that an EIR must include “a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will *normally* constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives” (emphasis added).

Therefore, Section 5.4, *Noise*, and other sections throughout as applicable evaluate potential impacts on these uses.

2.1 Regional Setting

Figure 2-1 shows the location of the approximately 2-acre project site within the City of San Diego. The City of San Diego covers approximately 207,000 acres in the southwestern section of San Diego County, in Southern California. The City is located approximately 17 miles north of the United States-Mexico border and is bordered on the north by the city of Del Mar, the city of Poway, and unincorporated San Diego County land. On the east, the City of San Diego is bordered by the cities of Santee, El Cajon, La Mesa, and Lemon Grove, as well as unincorporated County of San Diego land. To the south, San Diego is bordered by the cities of Coronado, Chula Vista, National City, and the United States-Mexico border. The Pacific Ocean is the City of San Diego's western border.

As shown in Figure 2-2, the project site is within the Serra Mesa Community Planning Area and the Mission Valley Community Planning Area. Mission Valley is composed of a wide, flat San Diego River floodplain with steep slopes and mesas along its northern and southern boundaries. Formed through the erosive actions of the San Diego River, the valley is characterized by a topography that gently slopes from about 600 feet above mean sea level (AMSL) on the eastern end of the community to sea level at the western end. The Mission Valley Community Planning Area occupies approximately 3,200 acres and is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and Interstate (I-) 5 on the west. The Serra Mesa Community Planning Area is located immediately to the north of Mission Valley and encompasses approximately 2,200 acres. It is characterized by relatively flat mesas with intervening canyons and is generally located between State Route 163 and I-15, south of Aero Drive.

2.1.1 Project Location

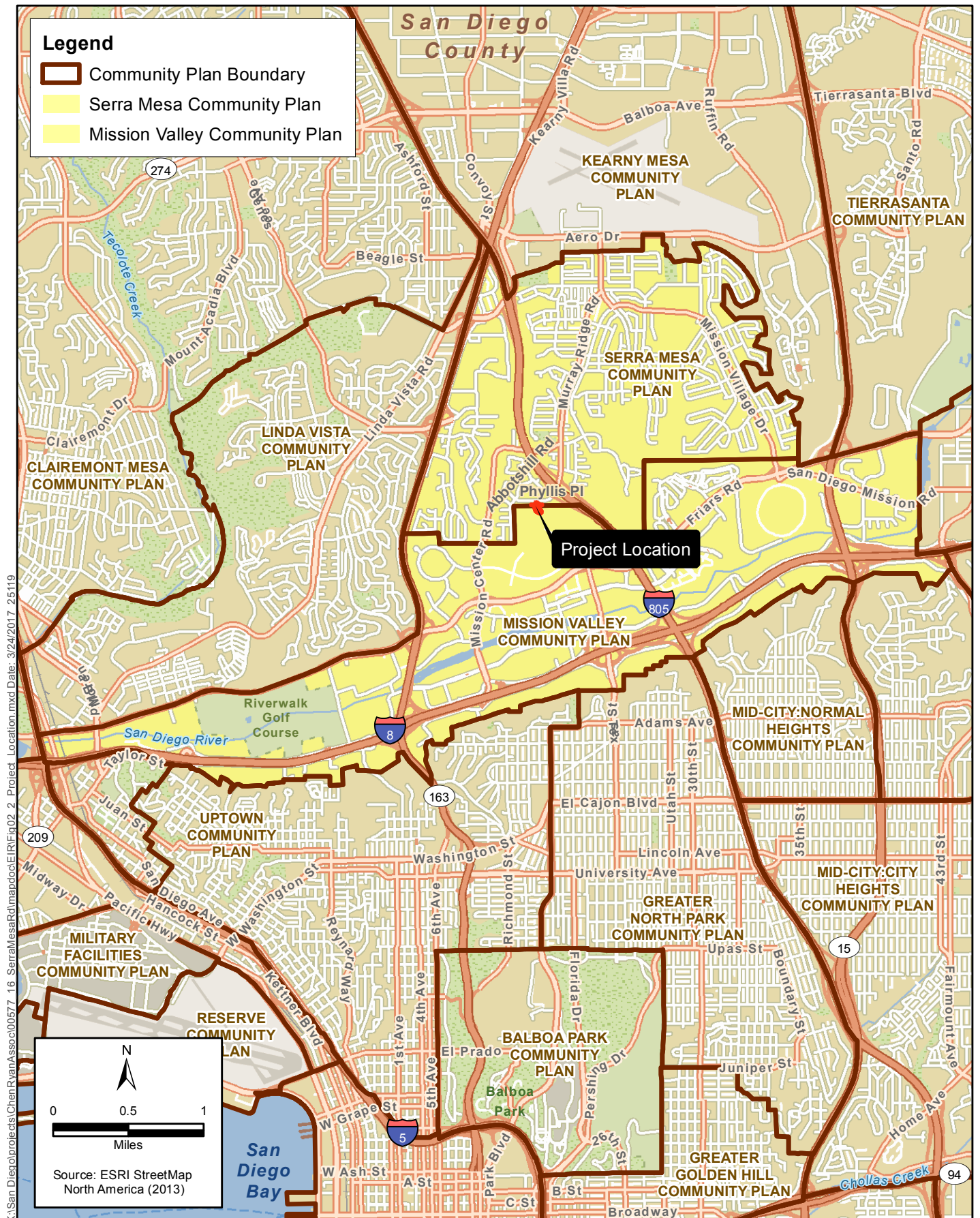
The project site is immediately south of Phyllis Place, east of Abbotshill Road, and approximately 0.25 mile west of I-805. The project site is within the boundary of the Quarry Falls site, including an undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an energy transmission line (four transmission poles) running east-west at the northern portion of the project site, adjacent to Phyllis Place.

2.1.2 Surrounding Uses

Figure 2-3 shows the uses surrounding the project site. To the north, the project site is bordered by Phyllis Place, a two-lane roadway that is designated to be expanded to four lanes by the Serra Mesa Community Plan. To the north of Phyllis Place is a religious facility (City View Church), and to the northeast along Phyllis Place is a multi-family development (City View Community). To the east of the project site is the existing SDG&E easement south of Phyllis Place (within the Serra Mesa Community Planning Area), a vacant portion of the Quarry Falls site, and the Phyllis Place on-ramp to I-805 south. To the south is another vacant portion of the Quarry Falls site, which is bordered generally to the south by Friars Road. To the immediate southwest/west of the project site, as of April 2015, are vacant graded areas that are planned to include multi-family residential and a dog



Figure 2-1
Regional Map



**Figure 2-2
Vicinity Map**

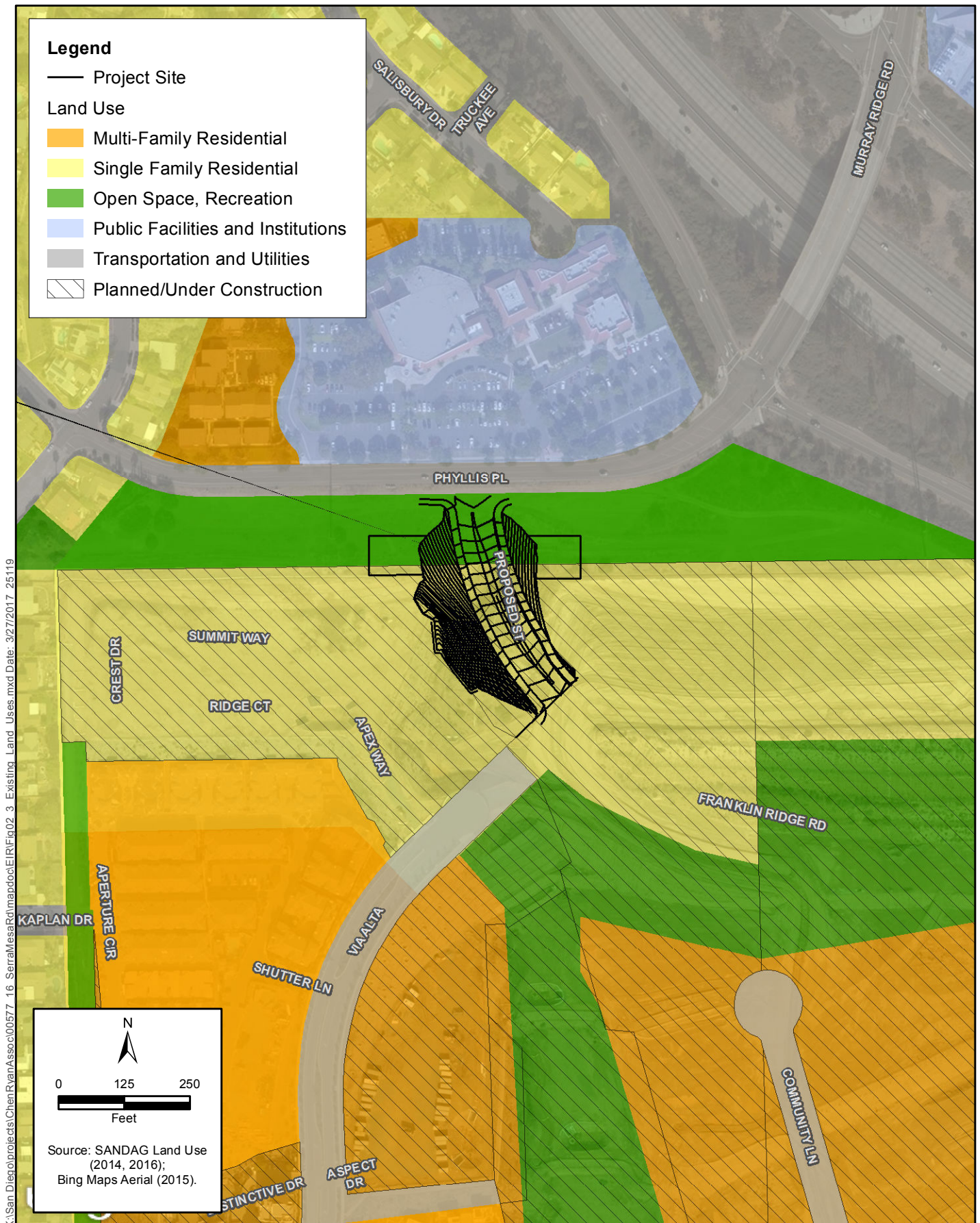


Figure 2-3
Existing Land Uses

park within Quarry Falls. Farther west of the Quarry Falls site, off Abbotshill/Ainsley Road, are single-family homes.

The Quarry Falls site encompasses approximately 225 acres immediately south of Phyllis Place. The Quarry Falls project includes development of a mixed-use, walkable community including residential, commercial, and parks and open space development. Franklin Ridge Road and Via Alta Road are roadways within the Quarry Falls site that are modified two-lane collector roads with left-turn pockets within an 86-foot-wide right-of-way accompanied by a 16-foot-wide median. The Quarry Falls PEIR shows these two streets meeting in the northern portion of the site and includes Class II bike lanes and a 6-foot-wide sidewalk on either side of each street.

2.2 Existing Physical Site Conditions

The project site is primarily disturbed, though it does not contain any buildings or structures. The project site contains one vegetation community and two land cover types. Approximately 0.25 acre of disturbed coastal sage scrub, a sensitive vegetation community, occurs within a portion of the project site. This is considered disturbed due to the low percentage cover of native species (approximately 20–45%). Approximately 1 acre of disturbed habitat was observed on site. This is a land cover type characterized by a predominance of nonnative species, often introduced and established through human action. Approximately 0.9 acre of developed land, defined as an area that has been constructed upon, was also observed on site.

The topography of the project site generally slopes downward naturally toward the southern extent of the Quarry Falls site. The highest elevation on site occurs along the northern portion of the proposed project at the existing road shoulder and sidewalk south of Phyllis Place (292 feet AMSL). The lowest elevation on site occurs in the central portion of the project site at 225 feet AMSL.

The project site is underlain by deposits of the Mission Valley Formation overlying deposits of Stadium Conglomerate. Engineered fill materials also occur on site. Five surficial soil types and one geologic formation were identified underlying the project site. The surficial deposits consist of compacted fill, undocumented fill, topsoil, alluvium, and Terrace Deposits underlain by the Stadium Conglomerate.

2.3 Existing Transportation Network

As the proposed project comprises a roadway connection, existing transportation facilities that make up the local network are briefly discussed below; however, Section 5.2, *Transportation and Circulation*, provides a detailed discussion of the existing transportation network, impacts, and mitigation measures.

2.3.1 Existing Roadway Network

Figure 2-4 shows the existing roadway network within the vicinity of the project site. A brief description of each roadway is provided below.

Phyllis Place/Murray Ridge Road runs in a northeasterly direction. Currently it functions as a two-lane roadway from Abbotshill Road to Pinecrest Avenue. Its ultimate classification in the Serra

Mesa Community Plan (2011) is a four-lane roadway. Murray Ridge Road provides the Serra Mesa Community access to I-805 and Mission Valley (via Mission Center Road). Parking currently exists on both sides for the majority of Phyllis Place and Murray Ridge Road. Murray Ridge Road also has Class II bike lanes and is served by Metropolitan Transit System (MTS) bus route 928.

Friars Road is an east-west regionally significant roadway that runs from the Navajo community to the east, where it becomes Mission Gorge Road and heads east into Santee, to Sea World Drive in Mission Bay to the west. Friars Road provides direct access to Qualcomm Stadium, Hazard Center, and Fashion Valley Mall. Within the vicinity of the project site, Friars Road functions as a six-lane roadway. There is no parking on Friars Road within the project study area. Friars Road has Class II bike lanes. The speed limit is 50 miles per hour (mph).

Mission Center Road is a north-south roadway that connects the Serra Mesa Community to Friars Road and eventually to I-8. It functions as a four-lane roadway between Mission Center Court and Friars Road with an ultimate classification of a six-lane roadway. Mission Center Road provides access to the project site, and the speed limit is 35 mph. Parking is prohibited along Mission Center Road. Mission Center Road has Class II bike lanes and is served by MTS bus route 928.

Via Alta and Franklin Ridge Road, according to the Quarry Falls PEIR, would provide north-south travel through Quarry Falls. Via Alta begins at the Creekside District in the western portion of Quarry Falls, traversing the Foothills District. Franklin Ridge Road has not been fully constructed at the time this DEIR was prepared. However, it would begin at the eastern terminus of Quarry Falls Boulevard. These streets have been designed to meet in the northern portion of the Specific Plan. These would be constructed as modified two-lane collector roads with left-turn pockets within 86-foot-wide rights-of-way and a 16-foot-wide median. The median would be reduced in width to 6 feet in order to allow for turn lanes. Class II bikeways and a 6-foot-wide sidewalk, separated from the streets by an 8-foot-wide parkway, would occur on both sides of Via Alta and Franklin Ridge Road. Neither street would allow for parking.

Civita Boulevard, according to the Quarry Falls PEIR,² would be constructed as the primary circulation spine for Quarry Falls. Paralleling Friars Road, Quarry Falls Boulevard would provide a vehicular, pedestrian, and bicycle connection between Mission Center Road on the west and Qualcomm Way on the east. The Quarry Falls Specific Plan includes varying treatments for Quarry Falls Boulevard as it extends from Mission Center Road to Via Alta and Qualcomm Way to Franklin Ridge Road.

2.3.2 Existing Transit Network

Transit opportunities in the vicinity of the project site include bus service and the trolley, both of which are operated by MTS. There are numerous bus routes that serve both communities, but also provide access to the Fashion Valley Transit Center, where commuters can then board the trolley.

As shown in Figure 2-5, several bus routes traverse the Mission Valley and Serra Mesa communities; however, the most pertinent to the vicinity of the project site include MTS bus routes 25 and 928. MTS route 25 runs from the Fashion Valley Transit Center northeast through Linda Vista, Mesa College, along Aero Drive in Serra Mesa, east to Tierrasanta, then back west ending at Kearny Mesa

² This roadway was originally called "Quarry Falls Boulevard" in the Quarry Falls PEIR, but has since been renamed along with the project. It is referred to as Civita Boulevard throughout this document.

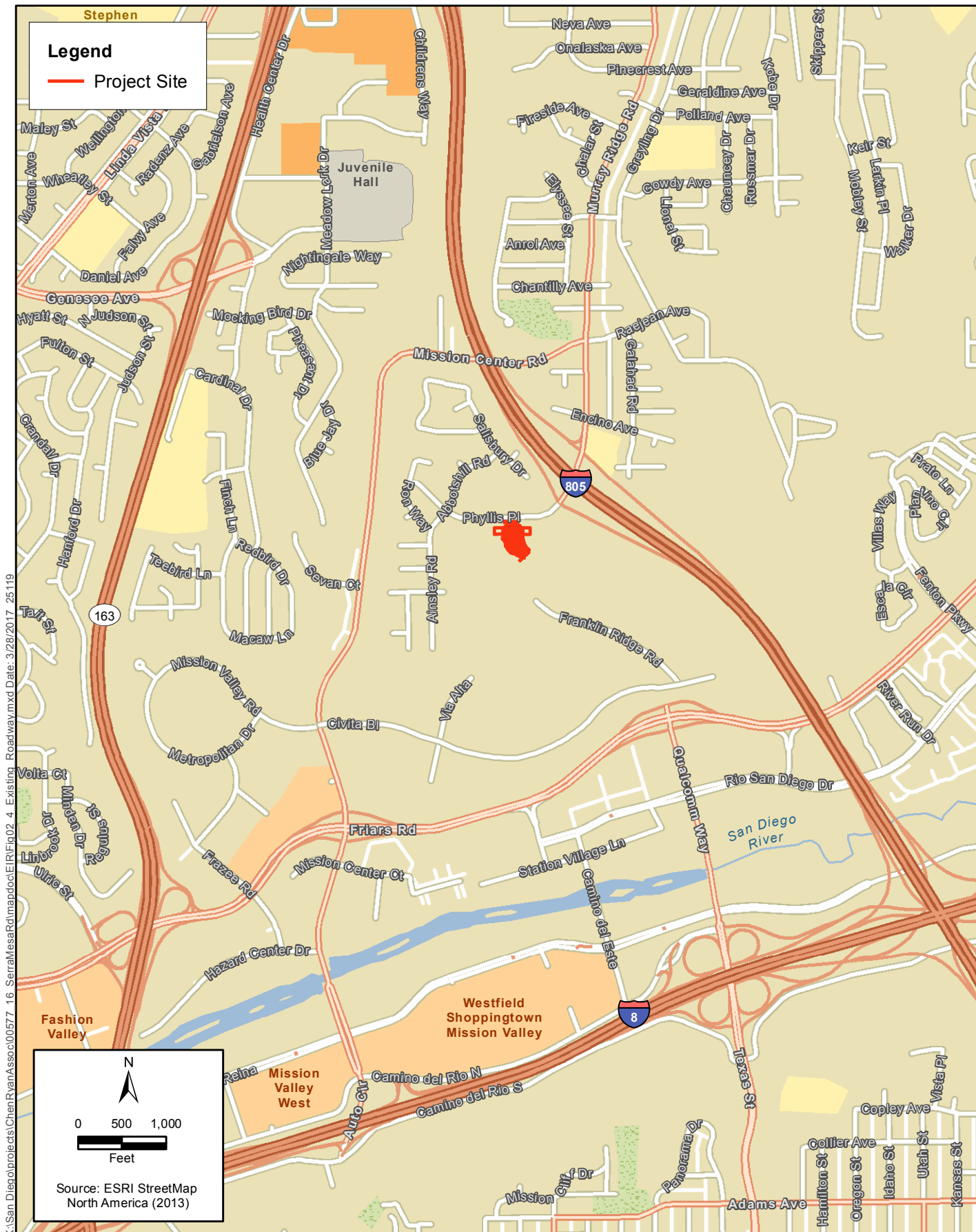
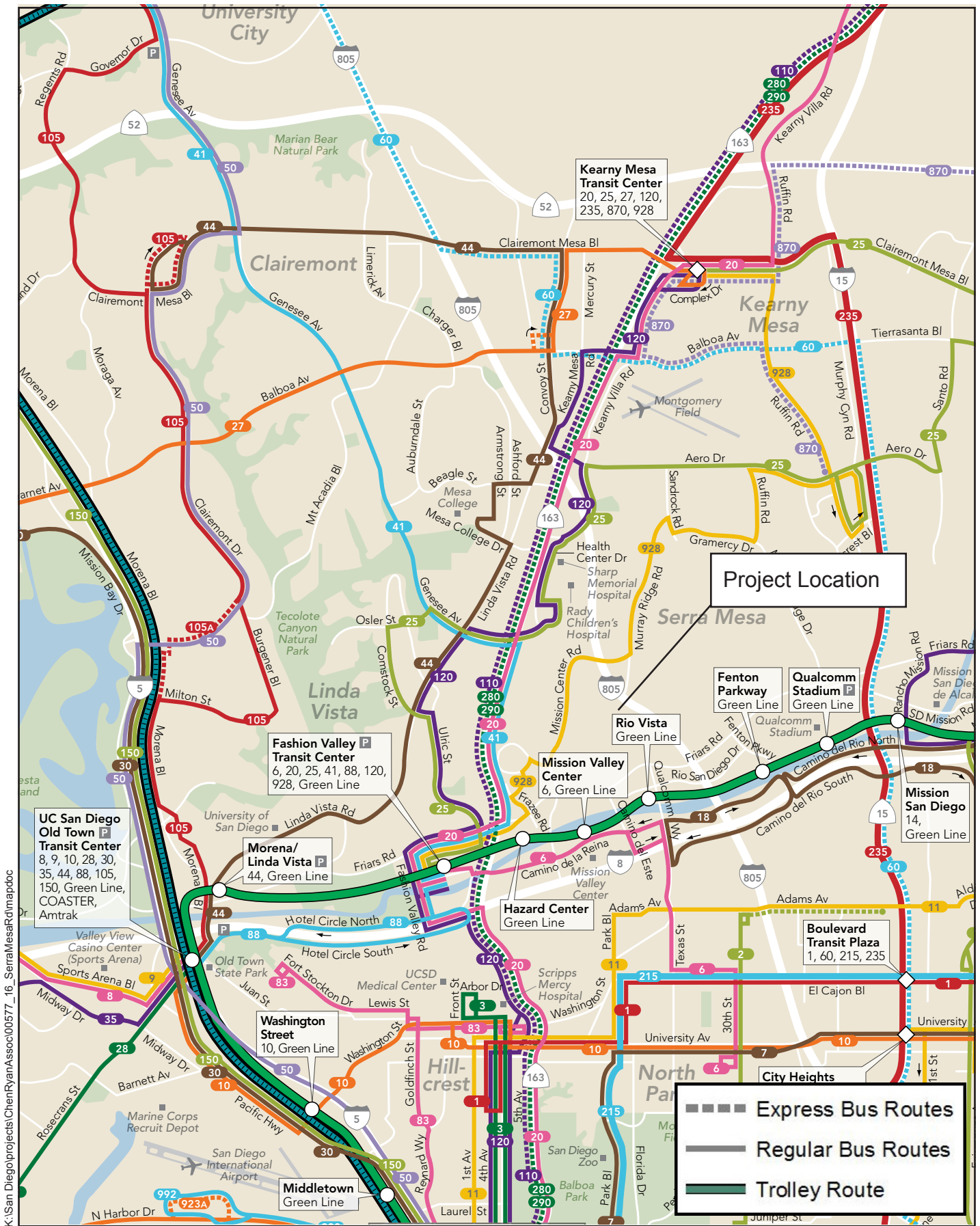


Figure 2-4
Existing Roadway Network



Source: SANGIS

Figure 2-5
Existing Transit Facilities within Project Vicinity

Transit Center. MTS route 928 also begins at the Fashion Valley Transit Center and runs northeast toward the vicinity of the project site via Mission Center Road, through Serra Mesa via Murray Ridge Road, then eventually north to the Kearny Mesa Transit Center via Ruffin Road.

The MTS trolley system's Green Line service runs through Mission Valley connecting Old Town and Downtown San Diego with Qualcomm Stadium, San Diego State University, and cities to the east. Within Mission Valley, the Green Line runs parallel to and along Friars Road with stops at Fashion Valley Transit Center, Mission Center Road/Hazard Center Drive, Mission Valley Center, Qualcomm Way (Rio Vista), Fenton Parkway, and Qualcomm Stadium. The MTS Green Line also connects with the Blue Line and Orange Line in Downtown San Diego to connect with the San Diego/Mexico border, and Southeast San Diego, Lemon Grove, and La Mesa. Extension of the system is planned for a northerly route to the University of California at San Diego and to University Towne Center in the next few years.

There are two trolley stations within the vicinity of the project site (see Figure 2-5): the Rio Vista Station and the Mission Valley Center Station. The Rio Vista Station is not currently served by any MTS bus routes and does not have any dedicated parking for transit users. The Mission Valley Center Station is served by MTS bus route 6, which runs from Fashion Valley to North Park via Camino de la Reina, Texas Street, and El Cajon Boulevard. There is no dedicated parking for transit users at the Mission Valley Center Station. Therefore, there are currently no bus routes or parking opportunities at the trolley stations within the immediate vicinity of the project site, although opportunities do exist to connect to the Fashion Valley Station, as previously detailed above.

2.3.3 Existing Pedestrian and Bicycle Circulation Network

Pedestrian facilities are provided as sidewalks and multi-use trails. Bicycle opportunities are provided by bikeways. The City has three classifications for bikeways: Class I (Bike Path or Trail), Class II (Bike Lane), and Class III (Bike Route). The City also has other bikeway designations including Freeway Shoulder, Cycle Track, and Bicycle Boulevard. A Class I bike path is located on the north side of Friars Road west of Fashion Valley Road to Sea World Drive, while a Cycle Track is located on the south side. A Class II bike lane is provided along Friars Road east of Fashion Valley Road. Additionally, there are Class II bike lanes along Mission Center Road and Qualcomm Way. Class I paths for both pedestrians and bicyclists have been developed within the San Diego River open space corridor.

The Quarry Falls project also included the provision of a network of publicly accessible trails and pedestrian amenities "to tie together the various open space, parks, recreation, and community activities" (page 3-17 of the Quarry Falls PEIR). A Park Trail was proposed that would traverse the Quarry Falls site from north to south, while a system of Finger Trails was proposed to serve as lateral connections to the various planning districts. The pedestrian trail system, in conjunction with the street network, is proposed to serve pedestrians and bicyclists. In addition, the proposed Phyllis Place Park is a passive-use park that includes a decomposed granite pathway for pedestrians along the south side of Phyllis Place. This park is discussed further within Chapter 3, *Project Description*.

2.4 Existing Emergency Services

Figure 2-6 shows the existing fire and police stations within the vicinity of the project site.

2.4.1 Fire Protection and Emergency Medical Services

The City of San Diego Fire-Rescue Department provides fire protection and emergency services for the project site. In the City, emergency medical services usually arrive first in a fire engine response (also known as first responder). First responders also provide full paramedic care and augment ambulance staffing during transport of critical patients. The paramedic/firefighter is reinforced by a paramedic ambulance.

The project site would be served by the San Diego Fire-Rescue Department Fire Station 45, which is located at 9366 Friars Road, approximately 1.3 miles east of the project site (Trame pers. comm.). Fire Station 45 serves an approximately 4.28-square-mile area in West Mission Valley and its surrounding areas (City of San Diego 2016a). Fire Station 45 opened in November 2015 and contains four battalion chief vehicles, Fire Engine 45, and two HAZMAT response units. In fiscal year 2016, Fire Station 45 responded to more than 3,080 incidents, including fire, rescue, emergency medical, non-emergency medical, and hazards.

Fire Station 28 at 3880 Kearny Villa Road, approximately 1.9 miles north of the project site, opened in 1958 and serves 7.76 square miles within Kearny Mesa/Montgomery Field and its surrounding areas and could also serve the project site (City of San Diego 2016b). The station contains a fire engine, truck, water tender, foam apparatus, and crash apparatus. In fiscal year 2016, Fire Station 28 responded to more than 3,581 incidents, including fire, rescue, emergency medical, urgent medical, non-emergency medical, and hazards.

As detailed in the City's General Plan (2008), fire and emergency medical response services are to be provided to ensure that service standards are attained for existing development and new development, as it occurs. Appropriate equipment and staffing should be assigned to the facilities to ensure adequate response to the population and the structure types that may exist in the community. Additional information is provided in Chapter 7, *Effects Not Found To Be Significant*.

2.4.2 Police Protection

Police services to the project site would be provided by the City of San Diego Police Department (SDPD). Information within this section is based on correspondence with SDPD (City of San Diego 2016c). The project site would be served by officers from the Eastern Division, which services numerous eastern communities including Serra Mesa, Qualcomm, and Mission Valley East. SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County.

Eastern Division is currently staffed with 84 sworn personnel and one civilian employee. Officers work 10-hour shifts. Staffing comprises three shifts that operate from 6:00 a.m.–4:00 p.m. (First Watch), 2:00 p.m.–midnight (Second Watch), and 9:00 p.m.–7:00 a.m. (Third Watch). Using SDPD's recommended staffing guidelines, Eastern Division currently deploys a minimum of nine patrol officers on First Watch, 11 patrol officers on Second Watch, and eight patrol officers on Third Watch. SDPD does not staff individual stations based on ratios of sworn officers per 1,000-population ratio. The goal citywide is to maintain 1.48 officers per 1,000-population ratio. SDPD is currently staffing a ratio of 1.36 sworn officers per 1,000 residents based on the estimated residential population of 1,311,882 in 2015. This ratio does not include the significant population increase resulting from citizens who commute to work from outside of the City of San Diego or those visiting. Additional information is provided in Chapter 7, *Effects Not Found To Be Significant*.

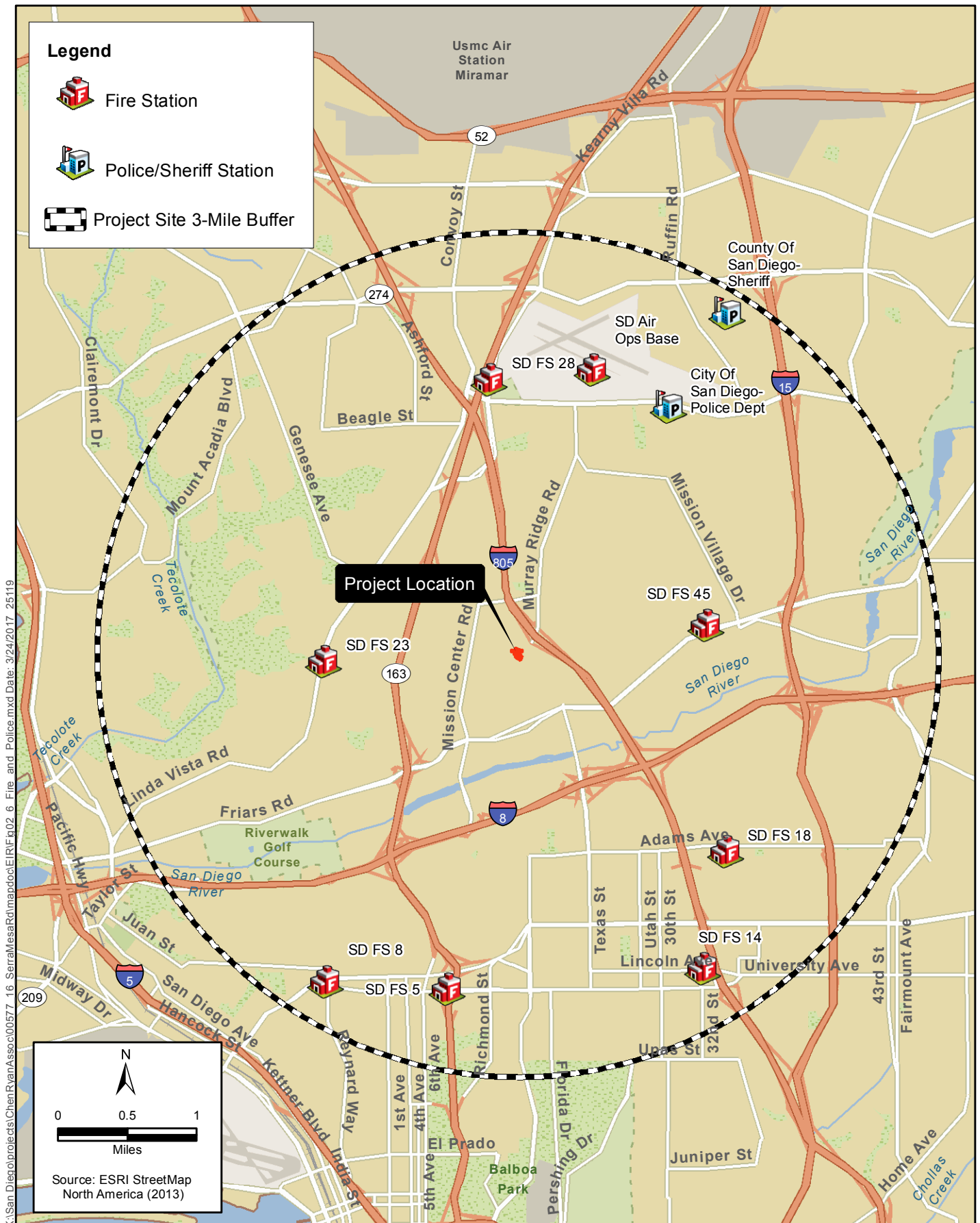


Figure 2-6
Fire and Police Stations within Project Vicinity

The proposed Serra Mesa Community Plan Amendment (CPA) Roadway Connection Project (proposed project) is located on approximately 2 acres in the Serra Mesa and Mission Valley communities of San Diego, California (see Figures 2-1 and 2-2). The proposed project consists of construction and operation of a four-lane major street, complete with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley (Figure 3-1).

The proposed project would require an amendment to the Serra Mesa Community Plan. This amendment would require map and text changes to the plan to include the roadway connection as a four-lane major street and revise the Street Classification and the Bikeways and Pedestrian Walkway figures in the currently adopted Serra Mesa Community Plan.

3.1 Project Objectives

The City of San Diego (City) has identified the following objectives for the proposed project.

- Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
- Improve local mobility in the Serra Mesa and Mission Valley planning areas.
- Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
- Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
- Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

3.2 Project Background

3.2.1 Project Initiation

Currently, there is a discrepancy between the Mission Valley Community Plan and Serra Mesa Community Plan regarding a roadway connection south from Phyllis Place. The Mission Valley Community Plan calls for a roadway connection; the Serra Mesa Community Plan does not include the connection on the roadway map (included in its Transportation Element).

Concerning the roadway connection, the Mission Valley Community Plan (adopted June 1985) states:

Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road

between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels.

On May 11, 2005, Quarry Falls, a limited liability corporation, submitted an application to the City for a CPA, general plan amendment, rezoning, specific plan, master planned development permit, site development permit, vesting tentative map, and conditional use permit/reclamation plan amendment for the Quarry Falls project. The Quarry Falls site is primarily within the Mission Valley Community Plan area, bordered on the south by Friars Road, on the north by Phyllis Place (within the Serra Mesa Community Plan area), on the east by I-805, and on the west by Mission Center Road (Figure 3-2).

As detailed in Chapter 1, *Introduction*, a Program Environmental Impact Report (PEIR) was prepared for the Quarry Falls project. Several alternatives within the Quarry Falls PEIR analyzed a potential road connection from the Quarry Falls development north to Phyllis Place. Specifically, Alternative 4 (Road Connection to Phyllis Place) analyzed the potential environmental impacts of the road connection itself. Figure 3-3 depicts the Road Connection to Phyllis Place Alternative that was shown in the Quarry Falls PEIR.

On October 21, 2008, the City Council held a public hearing and approved the Quarry Falls Project. As part of the actions by which it approved the Quarry Falls Project, the City Council initiated an amendment (Staff Recommendation Number 6) that directed City staff to analyze an amendment to the Serra Mesa Community Plan to include a street connection between Phyllis Place and Friars Road in the Serra Mesa Community Plan Transportation Element.

The Staff Recommendation (City Council Resolution R-304297) stated:

The City Council directs staff to analyze the following issues in relation to the street connection and land use plan amendments:

1. Whether police and fire response times would be improved with the road connection;
2. Whether the road connection could serve as an emergency evacuation route;
3. Whether it is feasible to make the road available for emergency access only; and
4. Whether pedestrian and bicycle access would be improved by the street connection.

Subsequently, on January 23, 2012, the City's Development Services Department circulated a Notice of Preparation for an EIR for the proposed project, stating that the project included a CPA, site development permit, and construction of the road. Prior to public review, however, the site development permit and construction of the road were removed from the scope and the CPA was analyzed at a "programmatic" level. On April 18, 2016, the PEIR was circulated for public review by the City's Planning Department. After considering the comments received during the public review period and to be responsive to the comments received, the City decided to analyze the road connection with a project-level analysis. The additional description and analysis warranted revisions to the draft PEIR, which in turn led the City to decide to replace the PEIR with a project-level EIR and recirculate for a second public review.

K:\San Diego\projects\ChenRyan\Assoc\00577 16 SerraMesaRd\mapdoc\EIR\Fig03 1 Project Site 2.mxd Date: 3/28/2017 25119

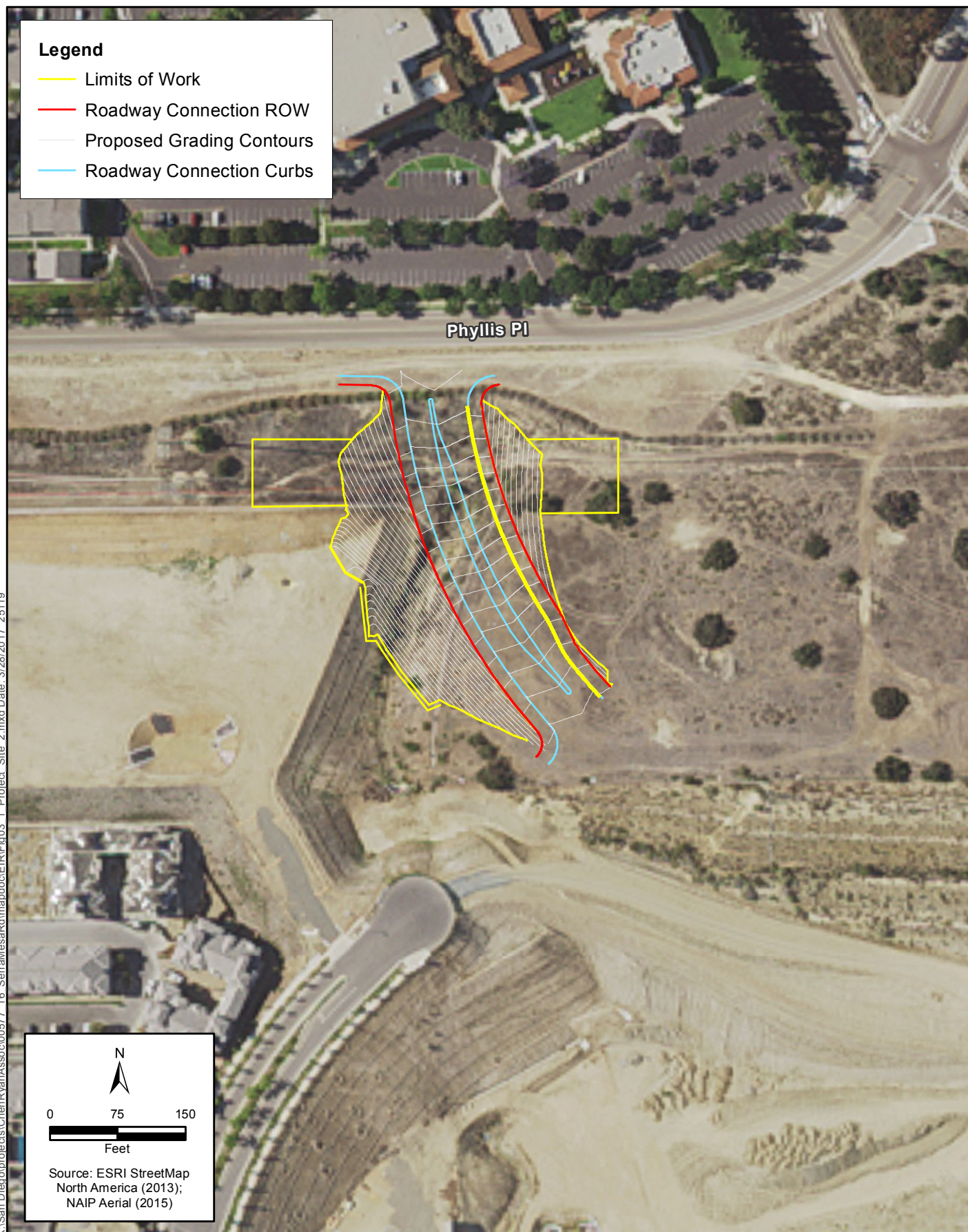


Figure 3-1
Project Site



Public Open Space is publicly owned or includes an easement for general public use

Figure 3-2
Quarry Falls Specific Plan Land Use Plan



Source: Quarry Falls PEIR, 2008

Figure 3-3
Road Connection to Phyllis Place, Alternative 4 (as depicted in Quarry Falls PEIR)

3.2.2 Relationship to Quarry Falls Project

The Quarry Falls mixed-use project was approved by the City Council in 2008 and is currently under construction. As previously detailed in Chapter 1, *Introduction*, the Quarry Falls PEIR is incorporated by reference throughout this DEIR and is available for review at the City's website;¹ a hard copy is available at the City Planning Department.²

The Quarry Falls PEIR stated that the proposed project would include a development cap that would prohibit the project from exceeding 4,780 residential units, 603,000 square feet of retail space, and 620,000 square feet of office/business park uses. The project would also include 31.8 acres of public and private parks, civic uses, open space and trails, and an optional school site. Construction of Segments A, B/C, and F on the southwestern portion of the site has been completed. Land uses within this area include currently occupied residences. The remaining portions of the Quarry Falls site will include multiple uses, including residential, mixed-use/commercial, and open space/park areas. Figure 3-4a shows the phasing plan for the Quarry Falls project. Figure 3-4b shows the planned pedestrian network as set forth in the Quarry Falls Specific Plan.

Quarry Falls has several areas for open space and recreational uses, including parks. The Quarry Falls Park as a whole is approximately 17 acres in size and when ultimately constructed will extend from the southern boundary of the Serra Mesa community to the north side to Quarry Falls Boulevard on the south. The Quarry Falls Park is composed of several smaller parks, trails, pathways, and other recreational uses, including two in the vicinity of the project site.

Phyllis Place Park is a proposed linear park that would be located on the southern side of Phyllis Place. It would be a 1.33-acre linear park for passive use activities. A series of overlooks would be provided with benches, tables, and interpretive panels. Special features include an overlook seating area, children's play areas that would include natural play components, and islands of planters along the primary walkway. The landscaping would include low-water-use California native plants.

The Quarry Falls developer has processed two General Development Plans for Phyllis Place Park that have been approved: one that assumed the road connection would occur (Figure 3-5a) and one that did not (Figure 3-5b). In either case, the acreage within the park would remain the same. The road connection would also be adjacent to the Upper Springs Park (as titled in the Quarry Falls Specific Plan and shown in Figure 3-6). As of April 2015 (the existing baseline condition), the area where the park would be located was vacant.

In addition, prior to construction, the Quarry Falls project site contained areas identified as Sensitive Lands in the City's Environmentally Sensitive Lands (ESL) Ordinance (Municipal Code Section 143.0100), including a small area (0.18 acre) of disturbed wetlands, as well as upland habitat (coastal sage, scrub, mixed chaparral, and annual grasslands) and a very small amount of steep slopes (less than 700 square feet). The ESL ordinance requires processing of a Site Development Permit (SDP) concurrently with the project's actions. The SDP issued in conjunction with the Quarry Falls project covers the parkland within the Quarry Falls Specific Plan area. The project site is within this covered area; therefore, under the SDP, potential environmental impacts on the ESL have already been accounted for.

¹ <https://www.sandiego.gov/planning/programs/ceqa>

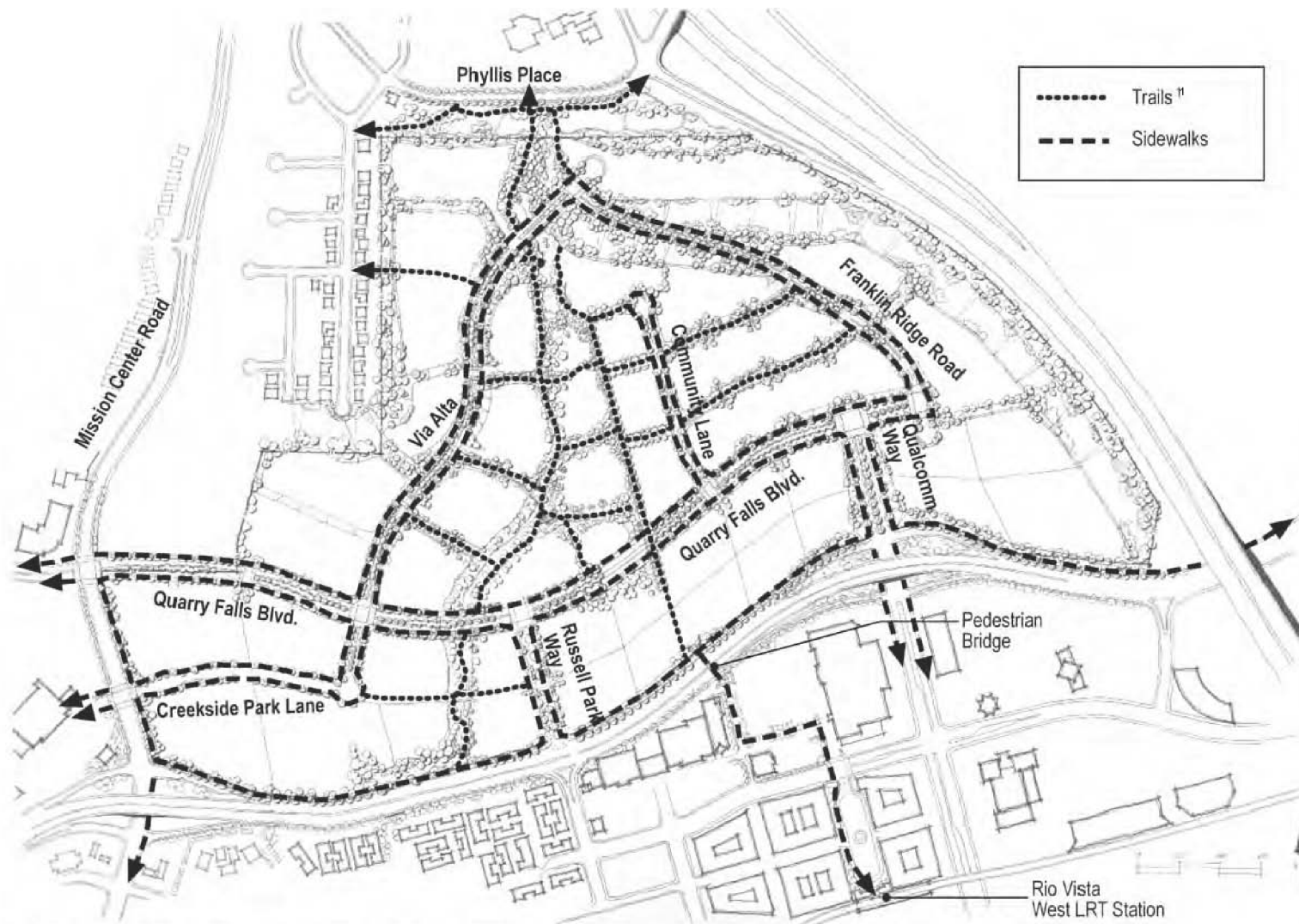
² 1010 Second Avenue, Suite 1200, East Tower, M.S. 413, San Diego, CA 92101

The proposed roadway connection can be accomplished with a public street easement dedication, which is a ministerial decision (Process 1) involving an administrative City staff level review. An amendment to add the roadway connection to the parkland in the SDP as part of this ministerial process, may include but not be limited to associated mapping actions, the dedication of the roadway easement, and construction review of any other associated public improvements that may be required as part of the project. It is reasonably foreseeable that the roadway could be proposed and implemented without further discretionary review if the proposed project were to be approved and this DEIR were to be certified.

The City is not proposing to construct or fund the roadway connection at this time, but only to analyze the environmental effects of its construction and operation, as directed by the City Council. The Quarry Falls developer or another entity could implement the proposed project. The Quarry Falls developer is currently subject to the Mitigation Monitoring and Reporting Program (MMRP) that was approved as part of the Quarry Falls PEIR, including mitigation for traffic impacts.

If the project were to be completed and its mitigation measures implemented, that fact could affect one or more of the impacts identified as significant in the Quarry Falls EIR for which the City previously imposed mitigation ~~and for which CEQA and the U.S. Constitution impose requirements regarding nexus and proportionality~~. To the extent that the Quarry Falls permittee were to present substantial evidence that demonstrated to the City's satisfaction that a significant impact were reduced or eliminated as a result of the roadway project, the City could consider, via the Substantial Conformance Review process, the appropriateness of amending that project's mitigation measures so as to help ensure that the mitigation imposed addresses the actual impacts of the project and conforms to the City's obligation to respect Constitutional limitations. ~~The City is not proposing to construct or fund the roadway connection but only to analyze the environmental effects of its construction and operation, as directed by the City Council. It is anticipated that the Quarry Falls developer would implement the proposed project; however, the proposed project could be implemented by another entity. The Quarry Falls developer is currently subject to the Mitigation Monitoring and Reporting Program (MMRP) that was approved as part of the Quarry Falls PEIR, including mitigation for traffic impacts. That MMRP assumed that there would not be a roadway connection because the City Council directed the planning staff to further analyze the connection. However, Alternative 4 within the Quarry Falls PEIR included mitigation measures for the roadway connection.~~

~~This EIR analyzed and recommends mitigation for certain issues that were previously analyzed in the Quarry Falls EIR. To the extent this EIR identifies mitigation for any impact that was also identified in the Quarry Falls EIR and for which mitigation was previously imposed, the mitigation identified in this EIR should be considered to take precedence because its analysis is based on updated data. For example, it includes an updated traffic study (Appendix C). Therefore, if the road connection (i.e., the proposed project) were to be implemented, the developer of that project would be required to adhere to the traffic/transportation mitigation measures included within this EIR. As a result, with respect to study locations where the two EIRs are congruent, implementation of the mitigation measures included within Section 5.2, Transportation and Circulation, would supersede corresponding traffic/transportation mitigation measures within the Quarry Falls EIR, provided that the Quarry Falls developer demonstrated to the satisfaction of the City Development Services Department that the mitigation sufficiently addresses that impact. To the extent the Quarry Falls EIR studied locations that were not studied in this EIR, the mitigation identified in the Quarry Falls EIR for those impacts would not be affected.~~



¹ May be constructed from a variety of materials including concrete, asphalt, and permeable materials.
 Conceptual design for illustrative purposes only. Actual design may vary from this typical representation.

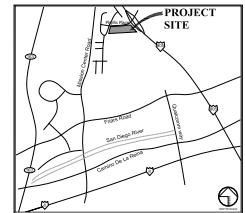
Source: Quarry Falls Specific Plan, 2008.

Figure 3-4b
Quarry Falls Pedestrian Circulation and Linkages

PARK DESIGN CONCEPT

Phyllis Place Park is a 1.33 acre park site proposed for a disturbed and underdeveloped area of land that is aligned along the road, Phyllis Place. The linear park is for passive use activities; including walking and enjoying spectacular views of Mission Valley along meandering walkways. A series of overlooks are provided with benches, tables and interpretive panels. Special features include a 'Historical Overlook' seating area, children's play areas that will include natural play components, and islands of planters along the primary walkway. The planting palette will include low water use California natives.

SITE MAP



Alternative Showing Road Connection



LEGEND

- | | |
|---|------------------------------|
| ① INTERPRETIVE GARDENS FEATURING CALIFORNIA NATIVES | ⑪ PICNIC TABLES, TYPICAL |
| ② DECOMPOSED GRANITE PATH | ⑫ DRINKING FOUNTAIN |
| ③ PROPERTY LINE | ⑬ TRASH & RECYCLE RECEPTACLE |
| ④ OVERLOOK NODE | ⑭ GUARDRAIL |
| ⑤A 2-5 YEAR OLD CHILDREN'S PLAY AREA | ⑮ INTERPRETIVE SIGNAGE |
| ⑤B 5-12 YEAR OLD CHILDREN'S PLAY AREA | ⑯ VIEWFINDER TELESCOPE |
| ⑥ SEAT WALL | ⑰ DOG STATION |
| ⑦ UTILITY EASEMENT | ⑱ BOULDERS |
| ⑧ FITNESS NODE | ⑲ TRANSMISSION TOWERS |
| ⑨ EXISTING DRIVEWAY | ⑳ SDGE EASEMENT ROAD |
| ⑩ BENCH, TYPICAL | ㉑ ENHANCED CONCRETE |

NATIVE PLANTING PALETTE

SHRUBS

<i>Agave shawii</i> Shaw's Agave	<i>Ceanothus griseus v. horizontalis</i> Carmel Creeper	<i>Rhus ovata</i> Sugar Bush
<i>Arctostaphylos densiflora</i> Howard McMinn Manzanita	<i>Eriogonum fasciculatum</i> 'Dana Point' Dana Point Buckwheat	<i>Ribes viburnifolium</i> Catalina Perfume Currant
<i>Arctostaphylos edmundsii</i> 'Danville' Danville Manzanita	<i>Fremontodendron</i> 'El Dorado Gold' El Dorado Gold Flannel Bush	
<i>Arctostaphylos</i> 'Emerald Carpet' Emerald Carpet Manzanita	<i>Galvezia speciosa</i> 'Firecracker' Firecracker Island Snapdragon	
<i>Artemisia californica</i> 'Montara' Prostrate California Sagebrush	<i>Heteromeles arbutifolia</i> Toyon	
<i>Baccharis pilularis</i> 'Pigeon Point' San Diego Mugwort	<i>Muhlenbergia rigens</i> Deergrass	
<i>Calliandra californica</i> Red Fairyduster	<i>Rhamnus californica</i> 'Eve Case' Eve Case Coffeeberry	
<i>Ceanothus concha</i> Concha Wild Lilac	<i>Rhus integrifolia</i> Lemonadeberry	

PERENNIALS

<i>Encelia californica</i> Coast Sunflower	<i>Penstemon centranthifolius</i> Scarlet Bugler
<i>Epilobium canum</i> California Fuchsia	<i>Penstemon spectabilis</i> Showy Penstemon
<i>Eriodictyon crassifolium</i> Thick-leaved Yerba Santa	<i>Salvia mellifera</i> Black Sage
<i>Lilium pardalinum</i> Leopard Lily	<i>Salvia spathacea</i> Pitcher Sage
<i>Lobelia cardinalis</i> Cardinal Flower	<i>Sisyrinchium bellum</i> Blue-eyed Grass
<i>Lupinus arboreus</i> Bush Lupine	<i>Sisyrinchium californicum</i> Yellow-eyed Grass
<i>Mimulus cardinalis</i> Scarlet Monkey Flower	<i>Zauschneria californica</i> 'Ghostly' Red Red CA Fuchsia
	<i>Zauschneria cana</i> Red California Fuchsia

TREES

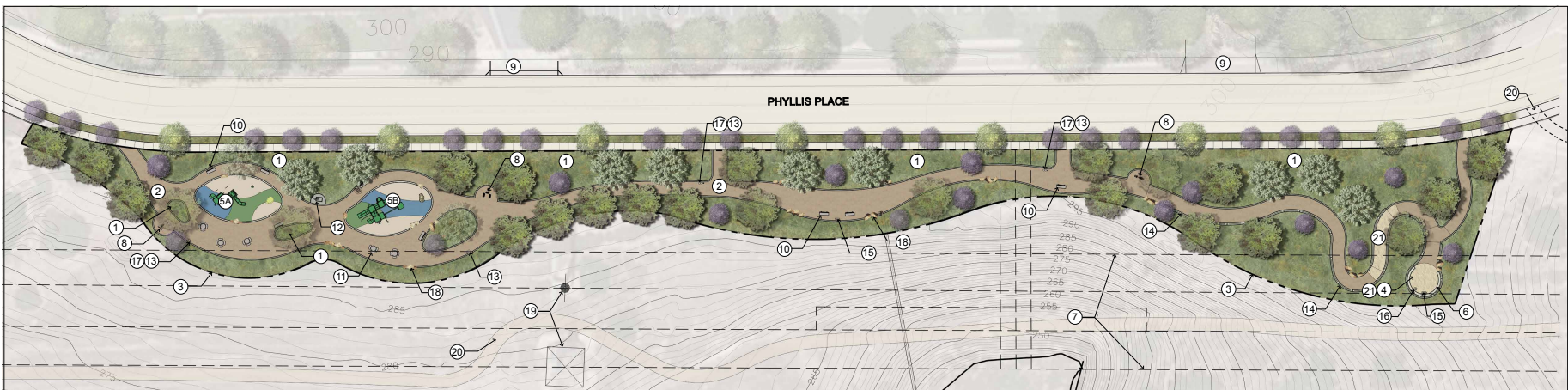
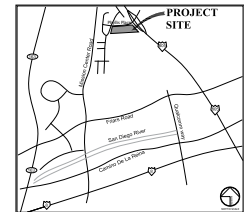
<i>Cercis occidentalis</i> Western Redbud
<i>Cupaniopsis anacardioides</i> Carrotwood
<i>Pinus torreyana</i> Torrey Pine
<i>Quercus agrifolia</i> Coast Live Oak
Existing Trees

PARK DESIGN CONCEPT

Phyllis Place Park is a 1.33 acre park site proposed for a disturbed and underdeveloped area of land that is aligned along the road, Phyllis Place. The linear park is for passive use activities; including walking and enjoying spectacular views of Mission Valley along meandering walkways. A series of overlooks are provided with benches, tables and interpretive panels. Special features include a 'Historical Overlook' seating area, children's play areas that will include natural play components, and islands of planters along the primary walkway. The planting palette will include low water use California natives.

An alternative park plan is included pending notification that a roadway connection may be developed.

SITE MAP



LEGEND

- | | |
|---|------------------------------|
| ① INTERPRETIVE GARDENS FEATURING CALIFORNIA NATIVES | ⑪ PICNIC TABLES, TYPICAL |
| ② DECOMPOSED GRANITE PATH | ⑫ DRINKING FOUNTAIN |
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| ⑥ SEAT WALL | ⑰ DOG STATION |
| ⑦ UTILITY EASEMENT | ⑱ BOULDERS |
| ⑧ FITNESS NODE | ⑲ TRANSMISSION TOWERS |
| ⑨ EXISTING DRIVEWAY | ⑳ SDG&E EASEMENT ROAD |
| ⑩ BENCH, TYPICAL | ㉑ ENHANCED CONCRETE |

NATIVE PLANTING PALETTE

SHRUBS

<i>Agave shawii</i> Shaw's Agave	<i>Ceanothus griseus v. horizontalis</i> Carmel Creeper	<i>Rhus ovata</i> Sugar Bush
<i>Arctostaphylos densiflora</i> Howard McMinn Manzanita	<i>Eriogonum fasciculatum</i> 'Dana Point' Dana Point Buckwheat	<i>Ribes viburnifolium</i> Catalina Perfume Currant
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<i>Baccharis pilularis</i> 'Pigeon Point' San Diego Mugwort	<i>Muhlenbergia rigens</i> Deergrass	
<i>Calliandra californica</i> Red Fairyduster	<i>Rhamnus californica</i> 'Eve Case' Eve Case Coffeeberry	
<i>Ceanothus concha</i> Concha Wild Lilac	<i>Rhus integrifolia</i> Lemonadeberry	

PERENNIALS

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TREES

<i>Cercis occidentalis</i> Western Redbud
<i>Cupaniopsis anacardioides</i> Carrotwood
<i>Pinus torreyana</i> Torrey Pine
<i>Quercus agrifolia</i> Coast Live Oak
Existing Trees



Source: Quarry Falls Specific Plan, 2008.

Figure 3-6
Quarry Falls Conceptual Park Plan

3.3 Project Components

The proposed project consists of (1) construction and operation of a roadway connection from Phyllis Place southward to Franklin Ridge Road and Via Alta Road and (2) an amendment to the Serra Mesa Community Plan. Components of the roadway are first discussed, followed by a discussion of the requisite changes to the Serra Mesa Community Plan.

3.3.1 Proposed Roadway

3.3.1.1 Roadway Design

The proposed roadway connection would extend approximately 460 feet south from Phyllis Place to Via Alta and Franklin Ridge Road. The project site evaluated throughout this DEIR encompasses approximately 2 acres, which includes the area required for grading and drainage improvements (see Figure 3-1). The proposed roadway itself would cover approximately 1.25 acre.

The City of San Diego's Street Design Manual (2002) contains guidelines for the physical design of roadways. The guidelines consider the needs of all users of the public right-of-way. The manual includes provisions for street trees and traffic calming, offers pedestrian design guidelines, and discusses how to create streets that are important public places.

The proposed project has been conceptually designed to be consistent with the Street Design Manual. A major street is defined by the manual as:

A street that primarily provides a network connecting vehicles and transit to other major streets and primary arterials, and to the freeway system, and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement, low-to-high pedestrian and bicycle movements, and moderate-to-high transit movement. It has a raised center median, street trees, traffic safety, street lighting, and sidewalks, and may include landscaping, pedestrian-scale lighting, underground utilities, on-street parking, and/or bike lanes.

The proposed roadway would be 460 feet long and classified as a four-lane major street, with an approximately 120-foot right-of-way. The dimensions of the cross-section for the proposed roadway are illustrated in Figure 3-7.

Conceptual design characteristics of the roadway, as analyzed in this DEIR, include the following:

- Design speed: 55 miles per hour
- Minimum radius: 880 feet, with 10% maximum super-elevation
- Maximum grade: 7%

The posted speed for the roadway would very likely be reduced from the design speed because of the relatively short length of the connection, which would transition into a residential area.

~~The posted speed limit would most likely be much less than 55 miles per hour; however, the~~ posted speed cannot be determined before the facility is in operation and is based on the roadway classification. After the project is completed, the City will resurvey the roadway traffic and set the posted speed limit according to the results of that survey, including, but not limited to, the 85th percentile speed. The posted speed would not exceed the design speed, and safety would be a primary consideration for the limit set.

3.3.1.2 Intersection Design

Phyllis Place currently functions as a two-lane collector from Abbotshill Road to Pinecrest Avenue. The ADT capacity of a two-lane collector (as defined by the City) is 15,000 trips. The ultimate classification of Phyllis Place (as defined by the Serra Mesa Community Plan) is a four-lane major street, which would have the ADT capacity for 40,000 trips.

The proposed project would require a signalized intersection at Phyllis Place. Figure 3-8 shows the cross-section of a standard four-lane major intersection; this would guide the final design for the area where the new roadway would adjoin Phyllis Place. Intersection control would also be required where the proposed roadway would meet Franklin Ridge Road and Via Alta, which are classified as modified two-lane collectors with left-turn pockets. The intersection would be similar to that illustrated in Figure 3-8.

City View Church, located on the north side of Phyllis Place, has a 50-foot-wide driveway that provides primary access to the Church's parking lot. The proposed roadway connection would not align with the City View Church driveway, as it would be located approximately 150 feet west of the driveway. This is because the roadway connection is required to be further west in order to provide adequate sight distance due to the slight curve along Phyllis Place from the I-805 ramps. Therefore, the intersection at Phyllis Place and the proposed roadway would not directly align with the City View Church driveway. The analysis of the proposed roadway and the potential relocation of the driveway is analyzed within Section 5.2, *Transportation and Circulation*.

3.3.1.3 Aesthetic Features and Landscaping

Hardscape features that are common to roadways—such as medians, pedestrian walkways, and retaining features—would be designed to minimize visual impacts on the scenic character of the area. Landscaping along the roadway would be low-maintenance native plantings, in accordance with the City's Landscape Standards (updated April 2016) within the Land Development Manual.

The Landscape Standards contain guidelines concerning plant materials, irrigation systems, and street rights-of-way. For example, planted areas within a center median shall have a minimum width of 2 feet, a minimum inside diameter of 4 feet, and a height no greater than 6 inches above the median curb. A 2-foot maintenance walk shall be provided around the perimeter of medians, inclusive of curbing.

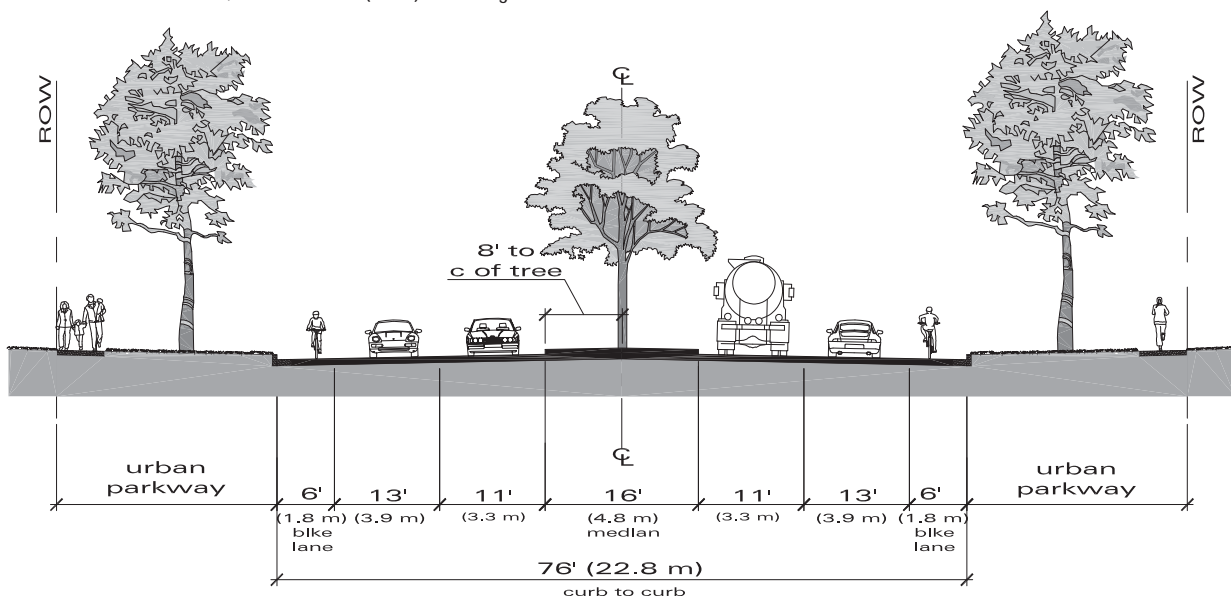
All disturbed slope areas would receive erosion-control hydroseed, and all slope areas with a 4:1 gradient or steeper would also receive stormwater and erosion-control fiber rolls. The hydroseed mix would consist of plant species that are native to Southern California, which could include species similar to those used in the Phyllis Place Park plans for continuity, including California sagebrush (*Artemisia californica*), purple needle grass (*Nassella pulchra*), or lemonadeberry (*Rhus integrifolia*).

The pedestrian walkway would consist of a 5.5-foot-wide walkway within the 22-foot-wide parkway. All walkways would be required to be in conformance with Americans with Disabilities Act standards. Temporary irrigation systems shall be provided for the parkway strips and embankments to establish project landscaping. Long-term maintenance of the parkway strips, embankments, and median shall consist of routine weed abatement and removal of invasive species, which shall be the responsibility of the City of San Diego Streets Division.

Width, Right-of-Way	120 ft. (36.0 m)	
Design ADT	LOS C	30,000
	LOS D	35,000
Design Speed	55 mph (90 km/h)	
Width (includes bike lanes and 16 ft. (4.8 m) raised center median), Curb-to-Curb ^{1,2}	76 ft. (22.8 m)	
Maximum Grade	7%	
Minimum Curve Radius	1,850 ft. (585 m) with no superelevation 1,350 ft. (430 m) with 2% (min.) superelevation 880 ft. (275 m) with 10% (max.) superelevation	
Land Use	Single Dwelling Residential-no front or side yards; Multiple Dwelling Residential-no front or side yards; Community Commercial-no front yards; Regional Commercial; Commercial Office; Visitor Commercial; Church; Public Building; Industrial; Open Space	
Parkway	U-4 (b)	

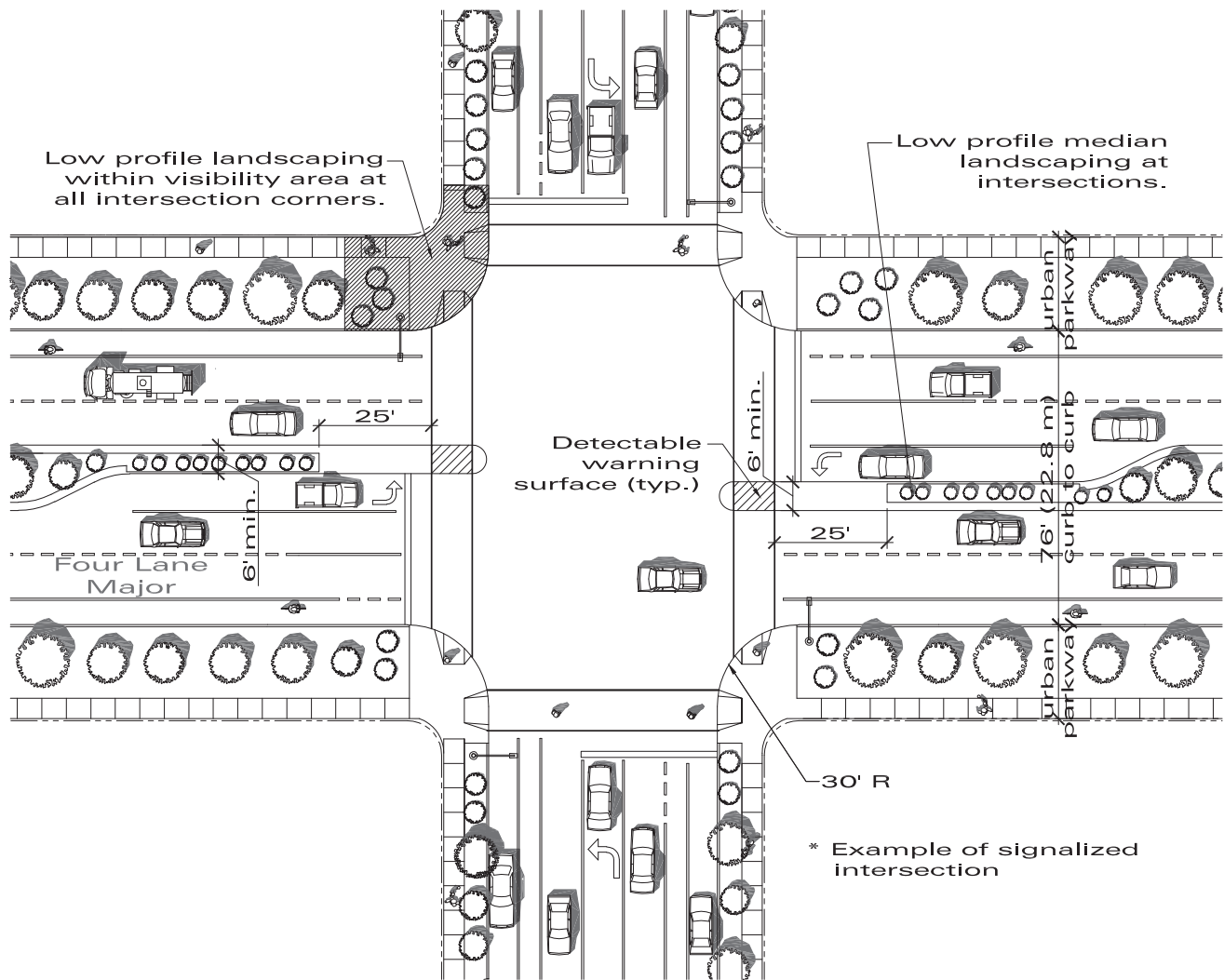
¹ Widen additional 10 ft. (3.0 m) at approaches to intersecting four-or-six-lane streets to provide a minimum of 250 ft. (75 m) of two-lane left-turn storage, exclusive of transitions. Receiving lanes for dual lefts shall be 12 ft. (3.6 m) wide. In instances where supporting information exists, such as an approved traffic impact study, showing clearly that dual left-turn lanes would not be warranted, the standard curb-to-curb width may be permitted.

² At intersections, a minimum 6 ft. (1.8 m) wide refuge island shall be maintained in the center median.



Source: City of San Diego Street Design Manual, 2002

Figure 3-7
Standard Four-Lane Major Roadway Cross-Section



Source: City of San Diego Street Design Manual, 2002

Figure 3-8
Standard Four-Lane Major Roadway Intersection

3.3.1.4 Utilities

As stated in the Public Utilities section of the Quarry Falls PEIR, “An existing 20-inch high-pressure gas transmission main crosses the northern portion of the project site, within the Vesting Tentative Map area but outside the Quarry Falls Specific Plan boundary, just south of Phyllis Place. This line runs below the SDG&E [San Diego Gas & Electric] transmission power lines.” This transmission main runs below the project site.

A portion of this high-pressure gas line would be raised within the easement to achieve a preferred depth of 3 feet from finished elevation (Quarry Falls PEIR, page 10-40). ~~The existing portion of the pipeline would be taken out of service and removed following construction of the new portion. The existing gas line must be kept in operation while the new portion is being raised. Once the new portion of the gas line is operational, the existing portion of the gas line would be filled with slurry and abandoned in place.~~

The area to conduct this work to bring the gas pipeline to the preferred depth is included within the project site. The Quarry Falls developer coordinated with SDG&E on this approach during preparation of the Quarry Falls PEIR; this approach has been preliminarily accepted by SDG&E, pending final design. The aforementioned transmission power lines are not likely to be affected by project activities; however, further coordination with SDG&E would occur prior to final design.

An existing 6-inch water main runs along the south side of Phyllis Place; however, it is not anticipated that the project would need to relocate this main (Rastakhiz pers. comm.). No sewer or recycled water mains exist within the vicinity of the project site.

3.3.1.5 Drainage

As further detailed in Section 5.8, *Hydrology and Water Quality*, the proposed roadway would require best management practices (BMPs). BMPs would be incorporated into the final design concept to treat potential pollutants from the project prior to discharging off site. The project would be required to comply with the most recent water quality protection standards at the time of construction. Prior to construction, project plans would be reviewed and updated as needed in order to demonstrate compliance with the applicable requirements of the municipal separate storm sewer system permit. The review process would verify that stormwater management objectives were considered in the project planning process and that opportunities to incorporate BMPs have been identified. These BMPs may require updates in order to meet the most recent standards at the time the project is ready to be constructed.

3.3.1.6 Construction

Based on preliminary engineering estimates, grading (assuming no shrink, undercuts, or spoils) would entail 43,500 cubic yards of fill and 0 yards of cut. The maximum fill would be approximately 46 feet. Based on preliminary engineering estimates, project-specific construction assumptions used in the environmental analysis include a 9-month construction period. The roadway would be approximately 460 feet in length and situated within a 2-acre project area. The maximum amount of soil movement would be limited to 500 cubic yards per day. For the purposes of analysis within this DEIR, it is assumed that construction of the roadway could begin in 2017.

The basic steps for roadway construction would include mobilizing equipment to the project site; clearing the road right-of-way; relocating utilities, including drainage culverts and channels;

constructing the roadway; installing slope landscaping and enhancements; constructing intersection modifications and adjacent roadway transitions; striping the travel lanes; and installing signals. If the Quarry Falls developer were to implement the project, there would be enough fill material from the existing Quarry Falls site for roadway construction; therefore, it is assumed that haul trips outside of the Quarry Falls site would not be necessary. If another entity were to implement the project and hauling trips would be required, additional analysis would be necessary. The conceptual staging area for project construction is expected to occur on previously cleared land within the Quarry Falls site. Upon completion of construction, the disturbed parts of the staging area would be cleared, regraded to match existing conditions, and, where appropriate, hydroseeded with the approved native plant palette.

3.3.2 Community Plan Amendment

The proposed project would revise text and figures in the Serra Mesa Community Plan to show a street connection from Phyllis Place (in Serra Mesa) southward to the boundary of the Serra Mesa and Mission Valley Community Plan Areas. The revised figures would include a street alignment to provide a four-lane major street with bicycle and pedestrian facilities. The amendment would result in revisions to all maps of the Serra Mesa Community Plan area, as shown in Appendix A. As further detailed in Section 5.1, *Land Use*, the proposed amendment would not conflict with existing plans, such as the City's General Plan, Climate Action Plan, or Bicycle Master Plan ~~Update~~. The proposed roadway is included within the Bicycle Master Plan ~~Update~~ as a Class II Bike Route and was also included in the assumptions used to develop the Climate Action Plan.

Chapter 4

History of Project Changes

In compliance with Section 15082 of the State CEQA Guidelines, the City of San Diego Development Services Department circulated the Notice of Preparation (NOP), dated January 23, 2012, to interested agencies, groups, and individuals for a 30-day period. Subsequent to circulation of the NOP, the City Planning Department initiated preparation of a Draft Program Environmental Impact Report (Draft PEIR) and circulated the draft document for a public review from April 18, 2016 to July 5, 2016. The Draft PEIR analyzed the programmatic action of the amendment to include Franklin Ridge Road in the Circulation Element of the Serra Mesa Community Plan.

In light of the public comments received during public review of the Draft PEIR, the construction of the roadway connection was determined to be foreseeable; therefore, a comprehensive update to the entire DEIR was undertaken and a project-level analysis was conducted and included within the recirculated Draft DEIR. Further evaluation of the subsequent actions necessary to implement and construct the roadway connection was completed.

This revised and recirculated ~~Draft Environmental Impact Report (DEIR)~~ analyzes impacts at a project level to ensure that all potential significant environmental effects associated with the project are disclosed. The revised Project Description is presented in Chapter 3 and includes construction and operation of a four-lane major street, with bicycle lanes and pedestrian pathways, extending from Phyllis Place in Serra Mesa southward to Via Alta and Franklin Ridge Road in Mission Valley. This revised DEIR has incorporated information and analysis from the Quarry Falls PEIR (July 2008) as it relates to conceptual design of the roadway, environmental setting, and the analysis of impacts, where applicable.

Chapter 5

Environmental Analysis

Sections 5.1 through 5.10 of this chapter contain discussions of the potential significant environmental effects resulting from implementation of the proposed project, including information related to existing site conditions, criteria for determining significance of potential environmental impacts, analyses of the type and magnitude of environmental impacts, and feasible mitigation measures that would reduce or avoid significant environmental impacts.

Potential Environmental Impacts

This chapter provides an analysis of the following potential environmental impacts of the proposed project.

- 5.1 Land Use
- 5.2 Transportation and Circulation
- 5.3 Air Quality
- 5.4 Noise
- 5.5 Biological Resources
- 5.6 Paleontological Resources
- 5.7 Hydrology and Water Quality
- 5.8 Historical Resources
- 5.9 Visual Quality and Neighborhood Character
- 5.10 Greenhouse Gas Emissions

It was determined during the Notice of Preparation scoping period that the proposed project would have either a less-than-significant impact or no impact associated with the following topics: Agriculture and Forestry Resources, Geology and Soils, Health and Safety, Mineral Resources, Population and Housing, Public Services and Facilities, Public Utilities, and Recreation. These topics are described in Chapter 7, *Effects Not Found to be Significant*, of this DEIR.

Format of the Environmental Analysis

Each of the 10 environmental topic sections of this chapter includes the following subsections.

Existing Conditions

According to Section 15125 of the State CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of a project to provide the “baseline condition” against which project-related impacts are compared. As previously discussed in Chapter 2, *Environmental Setting*, in certain cases, the near-term condition serves as a more appropriate

baseline condition because it would better represent the point in time when the project may become operational. Therefore, some issues that rely on the project traffic data within Sections 5.2, *Transportation and Circulation*, 5.3, *Air Quality*, 5.4, *Noise*, and 5.10, *Greenhouse Gas Emissions*, utilize the near-term baseline. Where this occurs, it is stated as such within these sections.

Regulatory Framework

This subsection provides a summary of regulations, plans, policies, and laws at the federal, state, and local levels that are relevant to the proposed project as they relate to the particular environmental resource area in discussion.

Impact Analysis

This subsection describes the methodology used for the analysis of the potential environmental impacts of the proposed project, identifies the criteria for determining the significance of potential impacts, states a conclusion as to whether the environmental impacts would be considered significant and unavoidable, less than significant with mitigation incorporated, or less than significant (see definitions under *Impact Discussion* and *Mitigation Measures*, below). Each topic analyzed is divided into specific issues, based on potential impacts, and is separated by construction and operation impacts wherever relevant. The discussion of potential impacts is based on the applicable threshold of significance (see *Significance Determination Thresholds*, above) for each issue. Where potential impacts are significant, mitigation measures are identified, as feasible, to minimize, rectify, reduce, eliminate, or compensate for the significant impacts with the goal of reaching a less-than-significant impact determination.

Impact Discussion

The analysis of environmental impacts considers both the construction and operation of the proposed project. As required by Section 15126.2(a) of the State CEQA Guidelines, direct, indirect, short-term, long-term, on-site, and/or off-site impacts are addressed, as appropriate, for the environmental issue being analyzed. This DEIR utilizes the following terms to describe the level of significance of impacts identified during the course of the environmental analysis.

- **No Impact:** used when the project's construction and/or operation would have no adverse effect on a resource.
- **Less than Significant:** used to refer to impacts resulting from implementation of the proposed project that are not likely to exceed the defined thresholds of significance, and potentially significant impacts that are reduced to a level that does not exceed the defined thresholds of significance after implementation of mitigation measures. In the latter case, the determination may also be stated as "less than significant with mitigation incorporated."
- **Significant:** often used to refer to impacts resulting from implementation of the proposed project that exceed the defined thresholds of significance and can be applied before identification of any mitigation measures. A "significant effect" is defined by Section 15382 of the State CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment [but] may be considered in determining whether the physical change is significant." For impacts that exceed a

threshold of significance, mitigation measures that avoid or reduce the potential impact are identified, which may cause the impact to be reclassified as less than significant if it is sufficiently reduced, or the impact may remain significant, in which case it is referred to as a significant and unavoidable impact (or unavoidable significant impact).

- **Significant and Unavoidable:** used to refer to significant impacts resulting from implementation of the proposed project that cannot be eliminated or reduced to below standards of significance through implementation of mitigation measures.

Mitigation Measures

Section 15126.4 of the State CEQA Guidelines requires an EIR to “describe feasible measures which could minimize significant adverse impacts.” Mitigation includes avoiding an impact altogether, minimizing impacts, rectifying impacts, reducing or eliminating impacts over time, or compensating for impacts by replacing or providing substitute resources. The State CEQA Guidelines define feasibility as “capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations.” This subsection lists the mitigation measures that could reduce the severity of impacts identified in the *Impact Discussion* subsection. Mitigation measures are the specific environmental requirements for construction or operation of the proposed project that will be included in the Mitigation Monitoring and Reporting Program and adopted as conditions of approval for the proposed project.

5.1 Land Use

Land use and planning issues refer to the proposed project's compatibility with surrounding land uses and its consistency with land use plans and policies that have regulatory jurisdiction over the project site. This section describes the existing land uses that could be adversely affected by the proposed project, outlines the applicable laws and regulations related to land use and planning, and analyzes the proposed project's compatibility with surrounding development, its consistency with applicable plans and regulations, such as the City of San Diego General Plan and Serra Mesa Community Plan, and its potential to conflict with any applicable habitat conservation plan or natural community conservation plan. The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in physical changes to the environment that would be considered significant under CEQA.

5.1.1 Existing Conditions

The existing characteristics on the project site and within the surrounding area are described in Chapter 2, *Environmental Setting*. For the reader's convenience, this section restates the existing site conditions provided in Chapter 2 as they apply to land use and planning.

5.1.1.1 Onsite Land Uses

Land Use

Within the City, land use categories are assigned by the General Plan and are then further refined by Community Plans. Land use categories define what type of use (i.e., residential, commercial) are allowed on a certain property. The proposed project, which consists of a roadway, would be considered a public right-of-way land use. Figure 5.1-1 shows the General Plan land use designations.

The project site has a General Plan land use category of Residential. As previously described, the project site is within the Serra Mesa and Mission Valley community plan areas. The Serra Mesa Community Plan designates the project site as "Low-Density Residential." Within the Mission Valley portion, the project site is within the Quarry Falls Specific Plan area, which is designated as Multi-Use under the Mission Valley Community Plan.

Zoning

Zoning categories typically define development regulations within a property, such as building height, floor-area ratio, and parking requirements. Figure 5.1-2 shows the zoning designations of the project site. There are four zoning designations that apply to the project site, as currently zoned by the City's Municipal Code: RS-1-7, which is for single-family residential use (minimum of 5,000-square-foot lots); RM-2-4, which is for medium-density multiple dwelling units (one dwelling unit for each 1,750 square feet of lot area); RM-3-8, which is for medium-density multiple dwelling units (maximum of one dwelling unit for each 1,000 square feet of lot area); and OP-2-1, which is for open

space park uses including passive and some active uses (San Diego Municipal Code, Chapter 13). Roadways are not subject to zoning restrictions. Current zoning would allow for a street connection as proposed; therefore, rezoning of the site under would not be required.

Existing Site Conditions

The project site is partially within the boundary of the Quarry Falls site and partially within an undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric (SDG&E) easement, which contains an active energy transmission line (four-post towers) running east-west at the northern portion of the project site, adjacent to Phyllis Place. A fiber optic utility easement extends parallel to Phyllis Place approximately 10 feet south of the back of the curb.

Planned Land Uses

As previously described in Chapter 3, *Project Description*, the Quarry Falls Park is approximately 17 acres in size and when ultimately constructed will extend from the southern boundary of the Serra Mesa community to the north side to Quarry Falls Boulevard on the south. The Quarry Falls Park is composed of several smaller parks, trails, pathways, and other recreational uses, including two in the vicinity of the proposed roadway.

Phyllis Place Park is a linear park located on the southern side of Phyllis Place (see Figures 3-5a and 3-5b). The Quarry Falls developer has processed two General Development Plans for the park, which were approved by the City Council: one ~~for~~ if the road connection were to occur and another ~~for~~ if it were not to occur. In either case, the acreage within the park would remain the same. The road connection would also be adjacent to the Upper Springs Park (as titled in the Quarry Falls Specific Plan; see Figure 3-6 within this DEIR). This park would be located west of the proposed roadway connection.

5.1.1.2 Surrounding Land Uses

To the north, the project site is bordered by Phyllis Place, a two-lane roadway that is designated to be four lanes by the Serra Mesa Community Plan. To the north of Phyllis Place is a religious facility (City View Church), and to the northeast along Phyllis Place is a multi-family development (City View Community). To the east of the project site is the existing SDG&E easement south of Phyllis Place (within the Serra Mesa community), a vacant portion of the Quarry Falls site, and the Phyllis Place on-ramp to Interstate (I-) 805 south. To the south is another vacant portion of the Quarry Falls site, which is bordered generally to the south by Friars Road. To the west is existing residential development within the Quarry Falls site and an SDG&E easement. Farther west of the Quarry Falls site, off Abbotshill/Ainsley Road, are single-family homes.

The Quarry Falls site encompasses approximately 225 acres immediately south of Phyllis Place. The Quarry Falls project includes development of a mixed-use, walkable community including residential, commercial, and parks and open space development. Franklin Ridge Road and Via Alta Road are roadways within the Quarry Falls site that are modified two-lane collector roads with left-turn pockets within an 86-foot-wide right-of-way accompanied by a 16-foot-wide median. These two streets will meet in the northern portion of the site and include Class II bike lanes and a 6-foot-wide sidewalk on either side of each street.

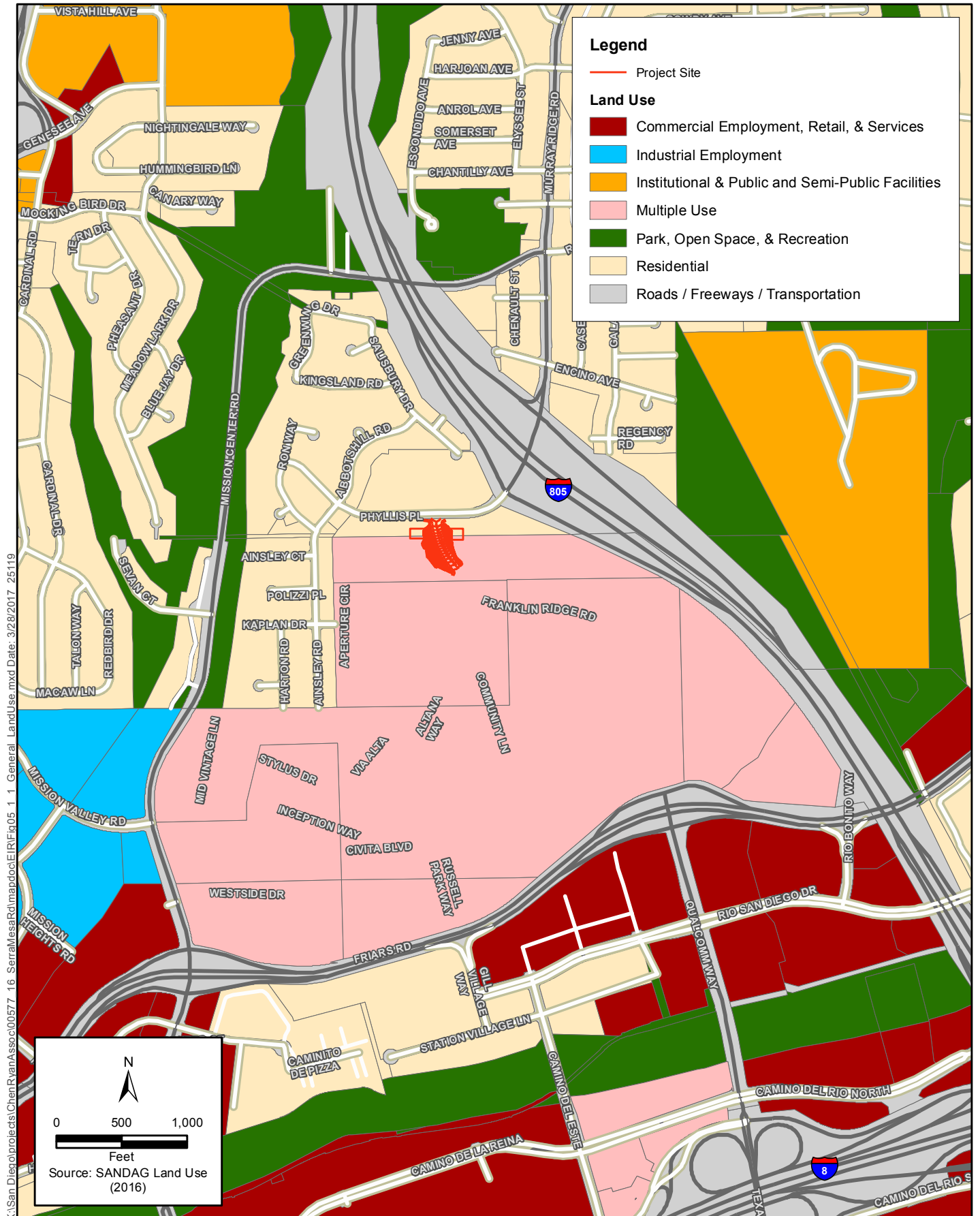
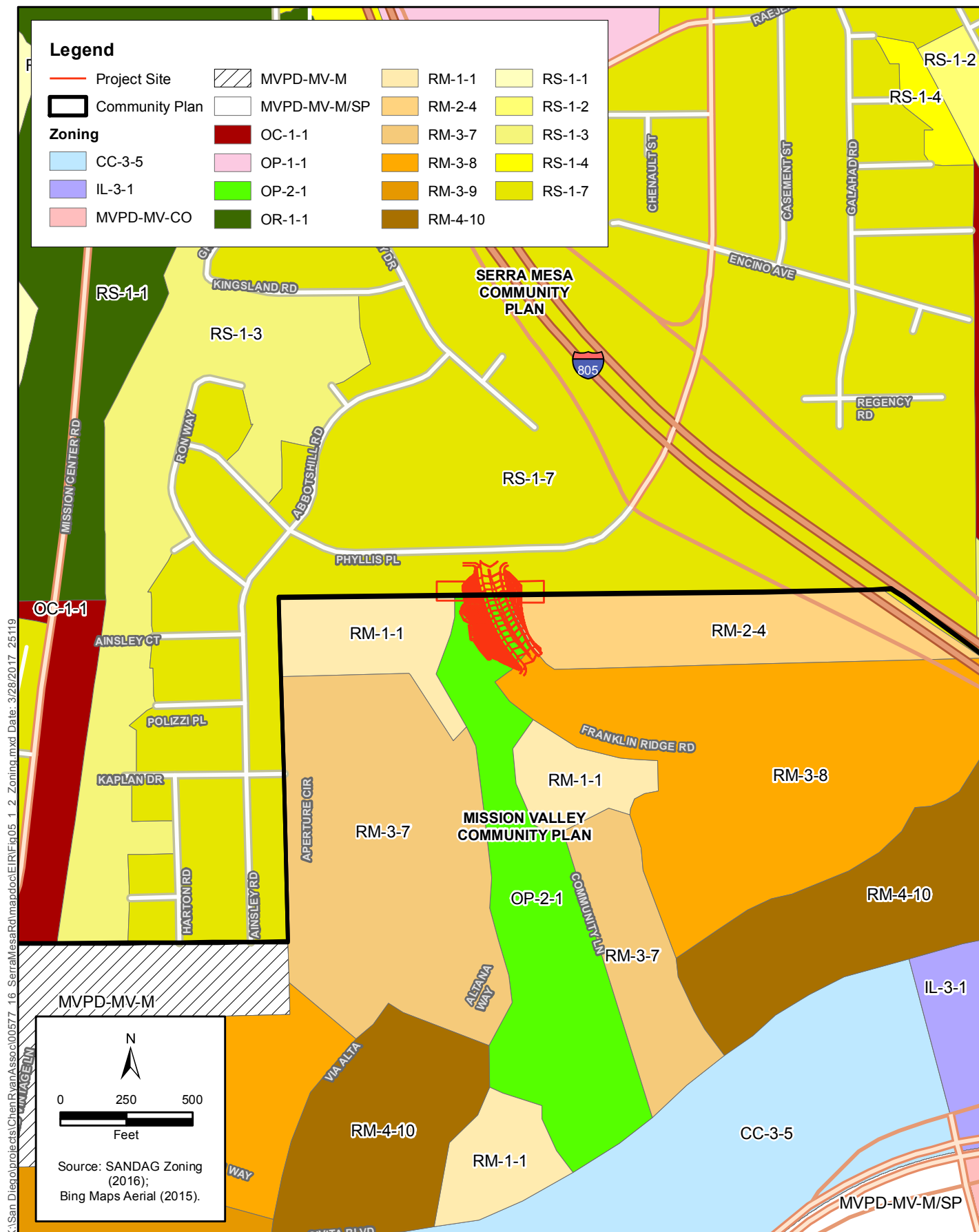


Figure 5.1-1
General Plan Land Use Designation



**Figure 5.1-2
Zoning**

5.1.2 Regulatory Framework

Applicable regulations and the associated agencies with regulatory authority and oversight are described below. The regulations discussed are limited to those set forth within the region and the City, as there are no applicable federal or state land use regulations for the proposed project.

5.1.2.1 Local

City of San Diego General Plan

California requires cities and counties to prepare and adopt a general plan to set out a long-range vision and comprehensive policy framework. The state also mandates that the plan be updated periodically to ensure relevance and utility. The City's General Plan was amended and unanimously adopted by the City Council on March 10, 2008, and the associated Land Use and Street System map was updated on March 15, 2010. The General Plan builds on many of the goals and strategies of the former 1979 General Plan, in addition to offering new policy direction in the areas of urban form, neighborhood character, historic preservation, public facilities, recreation, conservation, mobility, housing affordability, economic prosperity, and equitable development. It recognizes and explains the critical role of the community planning program as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process and other implementation strategies, and considers the continued growth of the City beyond the year 2020.

Most environmental goals relevant to the proposed project are contained within the General Plan's Land Use and Community Planning, Mobility, Urban Design, Economic Prosperity, and Noise Elements, as presented below.

Land Use and Community Planning Element: The purpose of this element is to guide future growth and development into a sustainable citywide development pattern while maintaining or enhancing quality of life. The Land Use and Community Planning Element addresses land use issues that apply to the City as a whole. The community planning program is the mechanism to refine citywide policies, designate land uses, and make additional site-specific recommendations. The Land Use and Community Planning Element establishes the structure to respect the diversity of each community, and includes policy direction to govern the preparation of community plans. The element also provides policy direction for zoning and policy consistency, the plan amendment process, coastal planning, airport land use compatibility planning, annexation policies, balanced communities, equitable development, and environmental justice.

Mobility Element: This element strives to improve mobility in the City by providing policies that support a balanced, multimodal transportation network while minimizing environmental and neighborhood impacts. The element contains policies that help make walking more viable for short trips, and addresses various other transportation choices in a manner that strengthens the City of Villages land use vision and helps to achieve a sustainable environment.

Urban Design Element: "Urban design" describes the physical features that define the character or image of a street, neighborhood, community, or the City as a whole. Urban design provides the visual and sensory relationship between people and the built and natural environment. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework.

Citywide urban design recommendations are necessary to ensure that the built environment continues to contribute to the qualities that distinguish the City as a unique living environment.

Economic Prosperity Element: The Economic Prosperity Element includes policies intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen the City's industries. This element links economic prosperity goals with land use distribution and employment land use policies. Employment land includes land used by industrial, commercial service, and commercial retail users.

Public Facilities, Services, and Safety Element: The Public Facilities, Services, and Safety Element addresses facilities and services that are publicly managed and have a direct influence on the location of land uses. Publicly or privately managed organizations, such as healthcare facilities, are also included, as they too affect land uses and public health and safety.

Recreation Element: The purpose of the Recreation Element is to preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users. The Recreation Element provides guidelines and policies to address recreation challenges such as increased demand, increased pressure to develop open space lands for recreational purposes, inequitable distribution of parks, and the need to balance competing land uses.

Conservation Element: The Conservation Element provides for the long-term conservation and sustainable management of the City's natural resources. Goals of the Conservation Element include reducing the City's overall carbon dioxide footprint, preserving and enhancing coastal resources, protecting and restoring water bodies, meeting regional air quality standards, and reducing GHG emissions.

Noise Element: The purpose of the Noise Element is to protect people living and working in the City from excessive noise. The Noise Element provides goals and policies to guide compatible land uses and incorporates noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. This purpose becomes more relevant as the City continues to grow with infill and mixed-use development, consistent with the Land Use and Community Planning Element.

Serra Mesa Community Plan

A portion of the project site is within the Serra Mesa community. The Serra Mesa Community Plan (originally adopted in 1977) encompasses approximately 6,596 acres and is characterized by the following major land uses: (1) Residential Development; (2) Commercial Development with subcategories of Professional Office, Local (neighborhood and convenience), Community Shopping Center, Regional General, Recreation/Visitor, and Health Institutional Complex; (3) Open Space; (4) Schools and Other Community Facilities; and (5) Parks and Recreation. The project site is within the southern portion of the Phyllis Abbotshill neighborhood of the Serra Mesa Community Plan area.

The Serra Mesa Community Plan, as amended on April 26, 2011, includes the following elements: Commercial, Parks and Recreation, Community Facilities, Transportation, Environmental Management, and Implementation. The goals and objectives of each of the elements that are relevant to the proposed project are summarized below.

Commercial Element: The Commercial Element contains goals and proposals aimed at encouraging the development of commercial districts that provide a wide variety of goods and services while improving the community environment.

Parks and Recreation Element: The Parks and Recreation Element provides basic guidelines to ensure high-quality, sufficient parks and recreational facilities for local residents of Serra Mesa; to continue development of bicycle and pedestrian improvements, which would also link parks, schools, and shopping opportunities throughout the neighborhood; and to explore opportunities for joint-use facilities between the City and local schools.

Community Facilities Element: The primary goal of the Community Facilities Element is to maintain all existing community facilities and services and secure financing to upgrade those that are affected by community growth and change. This element stresses that all community facilities and services respond to changing community characteristics to ensure that facilities and services remain adequate as the community builds out.

Transportation Element: The Transportation Element includes goals and proposals to provide a safe and efficient multimodal transportation system, including parking, while minimizing adverse environmental impacts. Alternative modes of transportation and traffic management programs are also promoted as ways to improve the circulation system.

Environmental Management Element: The Environmental Management Element includes objectives and proposals to manage the physical, biological, and socioeconomic environment, and ensure the preservation and conservation of community resources for future generations.

Implementation Element: The Implementation Element summarizes the implementation proposals necessary to fulfill the goals of the Serra Mesa community. The proposals are presented by category as follows: plan review and maintenance, citizen participation, development phasing, rezoning proposals (to bring in consistency with the plan), a summary table of public facilities (existing and proposed), and a summary of major plan proposals.

Mission Valley Community Plan

A portion of the project site is within the Mission Valley community. The Mission Valley Community Planning Area encompasses approximately 2,418 net acres and is characterized as an urbanized community, in which the major components of existing land uses include (1) Commercial, (2) Residential, and (3) Industrial.

The Mission Valley Community Plan, as amended in May 2013, includes the following elements: Land Use, Transportation, Open Space, Development Intensity, Community Facilities, Conservation, Cultural and Heritage Resources, Urban Design, and Implementation. The goals and objectives of each of the elements that are relevant to the proposed Community Plan Amendment (CPA) are summarized below.

Land Use Element: The Land Use Element encourages the redevelopment of vacant lands to mixed/integrated use lands. This element encourages varied land development that provides amenities to residents such as recreation, shopping, employment, and cultural opportunities.

Transportation Element: The Transportation Element includes objectives and proposals to establish and maintain a balanced transportation system that encompasses the street system, public transit, parking and goods delivery, bikeways, and pedestrian circulation. An emphasis is placed on closing gaps and correcting various deficiencies in the surface street system that have hindered mobility through the planning area.

Concerning the roadway connection, this section states:

Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805. Provision of these streets will not be considered until the sand and gravel operation has ceased and resource depletion has occurred. Additionally, the exact alignment will be determined by detailed engineering studies, by agreement between the City and the property owner at the time urban development takes place on these parcels.

Open Space Element: The Open Space Element identifies three key components that make up the community's open space linkage system: the San Diego River, prominent hillsides, and parks and recreation. This element encourages the linkage of all three of the key components into a visually and physically cohesive unit. A Hillside Review Overlay Zone is also established in this element, which guides development in these areas.

Development Intensity Element: The purpose of the Development Intensity Element is to establish guidelines for intensity of development due to the finite traffic capacity on the projected circulation system of the planning area. Development Intensity Districts are proposed to ensure compatibility between street carrying capacity and the maximum development intensity to enhance and maintain a high quality of life in the community.

Community Facilities Element: The Community Facilities Element identifies the community facilities in the planning area, which are to be maintained or expanded as needed while keeping an adequate level of service. This element's main objective is to maintain a high level of service for the full range of community facilities necessary in an urbanized area.

Conservation Element: The Conservation Element focuses on the conservation and protection of the following resources: air, water, land, and energy. Objectives, proposals, and design guidelines are outlined in this element to protect and enhance the quality of Mission Valley's air and water resources while conserving water, land, and energy resources.

Cultural and Heritage Resources: The Cultural and Heritage Resources Element includes objectives and proposals for the area's archaeological and historical sites, landmarks, and semipublic cultural facilities. Objectives include identification and preservation of archaeological and historical sites in the plan area.

Urban Design Element: The Urban Design Element identifies two functional categories that require special design considerations: (1) design protection areas, such as the San Diego River, hillsides, and landmarks, and (2) transportation corridors, including freeways, street systems, and light rail transit. Urban design in Mission Valley focuses on form and function of the community, which ties the community together.

Implementation Element: The Implementation Element recognizes that several issues and solutions to problems are unaddressed; therefore, this section provides guidance to put the entire plan into effect. Specific implementation mechanisms and responsibilities relating to public facility financing, schools, transportation improvements phasing, and legislative implementation are covered.

City of San Diego Climate Action Plan

In December 2015, the City adopted its Climate Action Plan (CAP). The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a “Business As Usual” projection for emissions in 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 million metric tons of carbon dioxide equivalent (MMT CO₂e) in 2020 and 16.7 MMT CO₂e in 2035. To achieve its proportional share of the state reduction targets for 2020 (Assembly Bill 32) and 2050 (Executive Order S-3-05), the City would need to reduce emissions below the 2010 baseline by 15% in 2020 and 50% by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO₂e in 2020 and 6.5 MMT CO₂e in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO₂e by 2020 and 205,462 metric tons of CO₂e by 2035. The proposed project’s consistency with the CAP is analyzed in Section 5.10, *Greenhouse Gas Emissions*, of this DEIR.

City of San Diego Bicycle Master Plan

The City’s Bicycle Master Plan provides a framework for making cycling a more practical and convenient transportation option for a wide variety of San Diegans with different riding purposes and skill levels. The plan recommends projects, policies, and programs to assist the City in improving bicycle infrastructure, based on a bicycle needs analysis. The Bicycle Master Plan calls for, among other things, the maintenance and improvement of the bikeway network and roadways regularly used by bicyclists.

The City’s Bicycle Master Plan ~~Update~~ proposes Class II (Bike Lane) facilities along Phyllis Place with a connection to Via Alta, Franklin Ridge Road, and Civita Boulevard. The Class II Bike Lane is shown connecting north toward Phyllis Place and across I-805 to Murray Ridge Road. It is also shown connecting to Friars Road from two points on the south from Civita Boulevard.

City of San Diego Land Development Code

Chapters 11 to 15 of the San Diego Municipal Code are referred to as the Land Development Code (LDC), as they contain the City’s planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the City. The LDC contains Citywide base zones that specify permitted land use, density, floor-area ratio, and other development requirements for given zoning classifications, as well as overlay zones and supplemental regulations that provide additional development requirements.

Environmentally Sensitive Lands Regulations: According to Section 143.0110 of the LDC, Environmentally Sensitive Lands Regulations apply to areas with any of the following: sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas. Development on a site containing environmentally sensitive lands requires a Site Development Permit in accordance with Section 125.0502 of the LDC. The project site contains steep hillsides and sensitive biological resources.

Historical Resources Regulations: The purpose of the City's Historical Resources Regulations, found in Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. The Historic Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact on the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual, as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a permit.

City of San Diego Multiple Species Conservation Program Subarea Plan

The Multiple Species Conservation Program (MSCP) is part of a comprehensive habitat conservation planning program for southwestern San Diego County. A goal of the MSCP is to preserve a network of habitat and open space to protect biodiversity while allowing development in less-sensitive lands. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City's MSCP Subarea Plan was adopted in March 1997 (City of San Diego 1997). The MSCP Subarea Plan is a plan and process for the City to issue permits under the federal Endangered Species Act (ESA) (16 U.S.C. [U.S.C.] 1531 et seq.), California Endangered Species Act (California Fish and Game Code Sections 2050–2116), and California Natural Communities Conservation Planning Act of 1991 (California Fish and Game Code Sections 2800–2835). The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve biodiversity while allowing for reasonable economic growth.

"MSCP Covered" refers to species covered by the City's federal incidental take permit (ITP) issued pursuant to Section 10(a) of the federal ESA (16 U.S.C. 1539(a)(2)(A)). Under the federal ESA, an ITP is required when non-federal activities would result in "take" of a threatened or endangered species. A habitat conservation plan must accompany an application for a federal ITP. Take authorization for federally listed wildlife species covered in the habitat conservation plan is generally effective upon approval of the habitat conservation plan.

As of April 20, 2010, the City may no longer rely on its federal ITP for authorization for incidental take of two vernal pool animal species and five plant species (seven vernal pool species). Development involving the take of these seven vernal pool species requires authorization from the U.S. Fish and Wildlife Service through the federal process until the City completes a new habitat conservation plan and enters into another implementing agreement for a new federal ITP for those species. Until the City's ITP for the seven vernal species is obtained, development that would involve

take of any of the seven vernal pool species requires authorization from the U.S. Fish and Wildlife Service through the federal process.

The Multi-Habitat Planning Area (MHPA) consists of areas within which the permanent MSCP preserve would be assembled and managed for biological resources. The MSCP identifies a 56,831-acre MHPA in the City for preservation of core biological resource areas and corridors targeted for preservation. The project site is not located within the MHPA.

San Diego Forward: The Regional Plan

The San Diego Association of Governments adopted San Diego Forward: The Regional Plan on October 9, 2015. The plan is an update of the Regional Comprehensive Plan for the San Diego Region and the 2050 Regional Transportation Plan/Sustainable Communities Strategy, combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. In addition to the 2050 Regional Transportation Plan, the Regional Plan includes a Sustainable Communities Strategy, in compliance with Senate Bill 375. The Sustainable Communities Strategy aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The purpose of the Sustainable Communities Strategy is to help the region meet the greenhouse gas (GHG) emissions reductions set by the state Air Resources Board. The Regional Plan has a horizon year of 2050 and projects regional growth and the construction of transportation projects over this time period. It should be noted that this plan focuses on expanding regional transportation projects, such as public transit, bike routes and walking paths, and managed lanes on highways. The plan does not focus on or address local roadway networks.

Montgomery Field Airport Land Use Compatibility Plan

The project site is within an Airport Land Use Compatibility Plan (ALUCP) for Montgomery Field (Figure 5.1-3). The ALUCP intends to safeguard the general welfare of the inhabitants in the vicinity of airports and the public in general. The ALUCP provides policies and criteria for the City of San Diego to implement and for the San Diego County Airport Land Use Commission (ALUC) to use when reviewing development proposals that require rezones and/or plan amendments. The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contained in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code).

In San Diego County, the ALUC function rests with the Board of the San Diego County Regional Airport Authority, in accordance with section 21670.3 of the California Public Utilities Code. As established by state law (Pub. Util. Code, Section 21670), the ALUC has the responsibility to both "provide for the orderly development of airports" and "prevent the creation of new noise and safety problems." ALUC policies thus have the dual objective of protecting against constraints on airport expansion and operations that can result from encroachment of incompatible land uses and minimizing the public's exposure to excessive noise and safety hazards. To meet these objectives, the ALUCPs address potential compatibility impacts related to four specific airport-related factors/layers: (1) noise—exposure to aircraft noise; (2) safety—land use factors that affect safety

both for people on the ground and the occupants of aircraft; (3) airspace protection—protection of airport airspace; and (4) overflight—annoyance and other general concerns related to aircraft overflights.

Montgomery Field is approximately 2 miles to the north of the project site. The project site is within Review Area 2 of the Airport Influence Area (AIA) for Montgomery Field. The Montgomery Field ALUCP is the fundamental tool used by the San Diego County Regional Airport Authority, acting in its capacity as the San Diego County ALUC, in fulfilling its purpose of promoting airport land use compatibility with Montgomery Field. Specifically, this ALUCP: (1) provides for the orderly growth of the airport and the area surrounding the airport; and (2) safeguards the general welfare of the inhabitants in the vicinity of the airport and the public in general (Pub. Util. Code Section 21675(a)). In essence, this ALUCP serves as a tool for the ALUC to use in fulfilling its duty to review land use plans and development proposals within the AIA at Montgomery Field. The ALUCP provides compatibility policies and criteria applicable to local agencies in their preparation or amendment of general plans and to landowners in their design of new development.

5.1.3 Significance Determination Thresholds

5.1.3.1 Issue Questions

As identified in the City's CEQA Significance Determination Thresholds (City of San Diego 2016), impacts related to land use would be significant if the project would:

1. Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment
2. Result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located
3. Conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan
4. Physically divide an established community
5. Result in land uses which are not compatible with an adopted ALUCP

It should be noted that merely being inconsistent with an existing plan or regulation would not necessarily be considered a significant impact under CEQA; rather, the inconsistency must result in a substantial adverse effect on the environment.

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Figure 5.1-3
Montgomery Field Airport Influence Area

5.1.4 Impact Analysis

Issue 1: Land Use Compatibility

Would the proposed project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

5.1.4.1 Impact Discussion

A deviation or variance from development regulations is typically sought by a project that involves the development of buildings that would not meet certain development regulations, such as a deviation for buildings to be taller in height than what is allowed. As the proposed project involves a roadway, the proposed project would not require any deviations or variances from building development regulations. As the project contains steep slopes, it is subject to the Environmentally Sensitive Lands (ESL) Regulations. As previously detailed in Chapter 3, *Project Description*, the ESL Regulations require processing of a Site Development Permit (SDP) concurrently with the project's actions. The SDP issued in conjunction with the Quarry Falls project covers the parkland within the Quarry Falls Specific Plan area. Under the SDP, potential environmental impacts on the ESL have already been accounted for.

The amendment to add the roadway connection to the parkland in the SDP would be subject to the specific plan's Project Review Category 1, a ministerial process. The Project Review Category 1 requires that applications for construction permits be consistent with the Land Development Code Base Zone Use categories and development regulations applied to the district or subdistrict, and that applications be processed pursuant to Process One, *Substantial Conformance Review*. This process includes projects that are consistent with the setback regulation deviations identified in the Specific Plan and Master Planned Development Permit. In addition, the transfer of average daily traffic within the same district and between the same land use is processed pursuant to this process. The proposed project would not meet any of the triggers for the other project categories (2 through 5) in the Quarry Falls Specific Plan, and the specific plan map would not need to be revised to show the roadway connection. Therefore, implementation of the proposed roadway connection would be consistent with ESL Regulations and no deviations from the regulations would be required.

As previously described, the project site is designated by the General Plan as Residential, by the Serra Mesa Community Plan as Low-Density Residential, and by the Mission Valley Community Plan as multiple use (through the Quarry Falls Specific Plan). The project site is zoned as: RS-1-7, which is for single-family residential use (minimum of 5,000-square-foot lots); RM-2-4, which is for medium-density multiple dwelling units (one dwelling unit for each 1,750 square feet of lot area); RM-3-8, which is for medium-density multiple dwelling units (maximum of one dwelling unit for each 1,000 square feet of lot area); and OP-2-1, which is for open space park uses including passive and some active uses (San Diego Municipal Code, Chapter 13). A small portion of the gas line work area within the project site extends into the RM-1-1 zone, which is for medium-density multiple dwelling units (a maximum density of 1 dwelling unit for each 3,000 square feet of lot area).

The proposed project entails the construction and operation of a roadway and an amendment to the Serra Mesa Community Plan to include the roadway connection. As such, the proposed project would be classified as public right-of-way and would not conflict with existing land uses because

public right-of-way is needed to access parcels no matter which land use designation they may be located in and because it would not preclude development of any parcels.

Indirect impacts of the roadway would potentially result from the vehicles on the roadway and the associated noise or pollutants that have the potential to affect sensitive receivers, such as nearby residents or those using the park or the church on the north side of Phyllis Place near the project site. The potential indirect impacts of the project, including air quality and noise, are analyzed throughout this DEIR (see Sections 5.3, *Air Quality*, and 5.4, *Noise*). As demonstrated in those sections, the proposed project would not conflict with planned land uses, including the parks to be located adjacent to the roadway within the Quarry Falls site.

From a land use compatibility perspective, the roadway would not conflict with the use of either of the parks within Quarry Falls Park. The proposed project would be consistent with the Quarry Falls project, as detailed within the Quarry Falls Specific Plan. As stated in Section 4.2 of the Quarry Falls Specific Plan:

The Quarry Falls land use design and circulation plan do not include the alignment of a northern street connection to Phyllis Place. The project design does not preclude such a connection and therefore is consistent with the Transportation Element of the Mission Valley Community Plan. Should the Serra Mesa Community Plan be amended at a future date to include the road connection, such an action would be found to be consistent with the Quarry Falls Specific Plan and therefore not require an amendment to this plan.

With regard to Phyllis Place Park, the Quarry Falls developer processed two separate approved General Development Plans for the park—one with and one without the roadway connection. In either scenario, the proposed park would retain the same acreage. Although the roadway would require a public right-of-way area that would interrupt the park, the park is a linear design that would still remain connected to the overall system using a pedestrian crossing at the intersection. The proposed project would ~~somehow~~ ^{somewhat} divide the park by placing a roadway in between the two portions of it; however, this would not represent a significant impact on the environment, as the proposed project would not result in hazards to pedestrians/park users. The roadway itself would be designed in accordance with applicable City regulations, including the Street Design Manual (City of San Diego 2002) and the intersection at Phyllis Place would be signalized and would include a signalized pedestrian crossing. Therefore, impacts would be less than significant.

5.1.4.2 Significance of Impact

The proposed project would not require a deviation or variance from development regulations. It would not conflict with existing or planned land uses in the vicinity of the project site, nor would it lead to indirect impacts otherwise not addressed in this document. Impacts would be less than significant.

5.1.4.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures would be required.

5.1.5 Impact Analysis

Issue 2: Land Use Plan Consistency

Would the proposed project result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located?

5.1.5.1 Impact Discussion

The proposed project's consistency with pertinent environmental goals, policies, and recommendations are provided in Table 5.1-1 and Table 5.1-2. The land use consistency analysis takes several factors into consideration. Overall, as shown in the consistency tables (see Table 5.1-1 and Table 5.1-2), the proposed project would implement and uphold the goals, policies, guidelines, and recommendations contained within the existing City of San Diego General Plan and the Serra Mesa Community Plan.

Specifically, the proposed project is consistent with planning goals identified in the Mobility Element of the General Plan, as the roadway would balance the needs of multiple users of the public right-of-way by providing vehicle, bicycle, and pedestrian lanes/sidewalks. Moreover, it would provide a linkage within and between communities (Mission Valley and Serra Mesa) and would expand personal travel options by providing a roadway connection from Serra Mesa to the trolley stations in Mission Valley that would allow pedestrians and cyclists a dedicated route.

The bicycle and pedestrian features would be compatible with the bicycle routes indicated in the Transportation Element of the Serra Mesa Community Plan by increasing connectivity to the community bikeway system and the bicycle route systems in adjoining communities (City of San Diego 2011), as well as priorities in the City's General Plan and Bicycle Master Plan. The Serra Mesa Community Plan includes environmental guidelines with respect to steep slopes and development. The project site is located on a steep slope on the western and eastern sides of the site. As discussed in DEIR Section 7.3, *Geologic Conditions*, measures have been provided to ensure that slope stability would be maintained; therefore, no significant impacts would occur regarding slope stability.

Similarly, the proposed project is consistent with the Mission Valley Community Plan, including the Transportation Element. One of the primary objectives of the Transportation Element is to close gaps and correct various deficiencies in the surface street system that have hindered mobility through the planning area. The proposed project would be consistent with this objective because it would close the gap between Friars Road in Mission Valley and Phyllis Place in Serra Mesa by providing a multi-modal linkage that accommodates vehicles, bicyclists, and pedestrians. Additionally, the Transportation Element states: "Public streets of adequate capacity to connect Stadium Way and Mission Center Road with I-805 at Phyllis Place will be needed when urban development occurs north of Friars Road between Mission Center Road and I-805." The proposed project would provide a direct public road connection between Qualcomm Way (formerly Stadium Way) and I-805 via Franklin Ridge Road and Phyllis Place. Furthermore, the proposed roadway has been conceptually designed to minimize disturbances to the natural landform to the extent feasible and mitigation is required to ensure the final hillside design creates natural contours to mimic the surrounding hillside. As such, the proposed project is consistent with the Open Space Element, Community Facilities Element, and Urban Design Element of the Mission Valley Community Plan.

Table 5.1-1. Proposed Project's Consistency with the City of San Diego 2008 General Plan

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Land Use and Community Planning Element			
Policy LU-B.2	Identify a more refined street system that is included in the General Plan Land Use and Streets Map through the community plan update and amendment process.	The proposed project intends to refine the local street system within the Serra Mesa and Mission Valley communities by analyzing a proposed roadway connection that would provide access between communities, to the regional freeways, and to local transit opportunities.	The proposed project is consistent with this policy.
Policy LU-C.1.c	Maintain consistency between community plans and the General Plan, as together they represent the City's comprehensive plan. In the event of an inconsistency between the General Plan and a community plan, action must be taken to either: (1) amend the community plan, or (2) amend the General Plan in a manner that is consistent with the General Plan's guiding principles.	The amendment to the Serra Mesa Community Plan would provide consistency between the Serra Mesa Community Plan and the Mission Valley Community Plan. The proposed project would also be consistent with the General Plan as it would provide a linkage between communities, increase mobility options within the communities (including increased access to transit opportunities such as the trolley), and provide vehicle congestion relief within some areas.	The proposed project is consistent with this policy.
Policy LU-C.2.f	Establish a mobility network to effectively move workers and residents.	The proposed project would enhance the existing mobility network by including a street connection between the communities of Serra Mesa and Mission Valley.	The proposed project is consistent with this policy.
Policy LU-C.5.c	Concurrently update plans of contiguous planning areas in order to comprehensively address common opportunities such as open space systems or the provision of public facilities and common constraints such as traffic congestion.	The proposed project would include a street connection between Serra Mesa and Mission Valley. The current Mission Valley Community Plan designated the proposed project site for multiple use development, allowing for a relatively large scale real estate project. The Quarry Falls Specific Plan addressed the large scale development of the proposed project area.	The proposed project is consistent with this policy.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
		According to the traffic impact studies (Appendix C), the proposed project, when constructed in the future, would provide more direct access to regional freeways and businesses, which would generally alleviate traffic congestion on neighborhood streets, but would see a rise in delay at certain areas near freeway ramps. Overall, the project would improve community access in the Serra Mesa community and the Mission Valley community.	
Policy LU-D.1	Require a General Plan and community plan amendment for proposals that involve a change in community plan-adopted land use or density/intensity range; a change in the adopted community plan development-phasing schedule; or a change in plan policies, maps, and diagrams.	The proposed project would change the adopted street classification and functional street system roadway maps. Therefore, a CPA is required.	The proposed project is consistent with this policy.
Policy LU-D.3	Evaluate all plan amendment requests through the plan amendment initiation process and present the proposal to the Planning Commission or City Council for consideration.	The proposed project was initiated by City Council Resolution 304297 and through the approval process will meet these procedural requirements.	The proposed project is consistent with this policy.
Policy LU-D.12	Evaluate specific issues that were identified through the initiation process, whether the proposed amendment helps achieve long-term community goals, as well as any additional community-specific amendment evaluation factors.	The proposed project would include a street connection to achieve long-term community goals. It would solve an inconsistency between the Serra Mesa Community Plan and the Mission Valley Community Plan.	The proposed project is consistent with this policy.
Policy LU-H.6	Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	The proposed project would include a street connection that would, if constructed, provide a street system with pedestrian and bicycle components that would enhance these networks and provide linkages among employment sites, housing, and villages.	The proposed project is consistent with this policy.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Environmental Justice Goal I	Improve mobility options and accessibility in every community.	The proposed project is a street connection between two communities designed to increase mobility options and accessibility in Serra Mesa and Mission Valley.	The proposed project is consistent with this goal.
Policy LU-I.7	Treat all people fairly with respect to the development, adoption, implementation, and enforcement of transportation policies, plans, and projects.	Traffic reports have been prepared for the proposed project (Appendix C) that analyze the implementation of the project's transportation-related impacts on the adjacent communities and residences.	The proposed project is consistent with this policy.
Policy LU-I.11	Implement the City of Villages concept for mixed-use, transit-oriented development as a way to minimize the need to drive by increasing opportunities for individuals to live near where they work, offering a convenient mix of local goods and services and providing access to high-quality transit services.	The proposed project, if implemented, would increase circulation options for the Serra Mesa and Mission Valley communities, particularly linking the community of Serra Mesa to the Quarry Falls site, which upon buildout would provide a mix of local goods and services to both communities. The Quarry Falls site incorporates access points to high-quality transit services, which would become more readily/easily available to those living in the community of Serra Mesa.	The proposed is consistent with this policy.
Mobility Element			
A. Walkable Community Goal II	Create a safe and comfortable pedestrian environment.	The proposed project would include a street connection. Sidewalks would be included as part of the future implementation of the roadway (if constructed), as well as a landscape buffer between the sidewalk and road for a safe and comfortable pedestrian linkage to the surrounding communities.	The proposed project is consistent with this goal.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
A. Walkable Community Goal III	A complete, functional, and interconnected pedestrian network that is accessible to pedestrians of all abilities.	The proposed project would include a street connection that if implemented would include sidewalks that would serve as an Americans with Disabilities Act (ADA) compliant pedestrian facility that would link the communities of Serra Mesa and Mission Valley.	The proposed project is consistent with this goal.
A. Walkable Community Goal IV	Greater walkability achieved through pedestrian-friendly street, site, and building design.	The proposed project would include a street connection that if implemented would be designed to address pedestrian needs by providing pedestrian facilities such as sidewalks and landscaping along the roadway extension.	The proposed project is consistent with this goal.
Policy ME-A.6	<p>Work toward achieving a complete, functional, and interconnected pedestrian network.</p> <ul style="list-style-type: none"> a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian-oriented and street lighting, ramps, stairways, and other facilities are implemented as needed to support pedestrian circulation. <ul style="list-style-type: none"> 1. Close gaps in the sidewalk network. 2. Provide convenient pedestrian connections between land uses, including shortcuts where possible. 3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets. b. Link sidewalks, pedestrian paths, and multipurpose trails into a continuous regionwide network where possible. e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects. 	The proposed project would include a street connection. The future implementation of the proposed project would close the gaps in the sidewalk network connecting the communities of Serra Mesa and Mission Valley. This street connection, including pedestrian facilities, would be linked to the Quarry Falls site.	The proposed project is consistent with this policy.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
C. Street and Freeway System Goal I	A street and freeway system that balances the needs of multiple users of the public right-of-way.	The proposed project, if constructed, would provide a balance within the street system for the geographic area, as future implementation would include a sidewalk and bicycle facilities within the public right-of-way.	The proposed project is consistent with this goal.
C. Street and Freeway System Goal II	An interconnected street system that provides multiple linkages within and between communities.	The proposed project would resolve a conflict between two community plans and include a street connection that would provide a linkage between the communities.	The proposed project is consistent with this goal.
C. Street and Freeway System Goal III	Vehicle congestion relief.	The proposed project, if implemented, would provide more direct access to regional freeways and businesses, which would generally alleviate traffic congestion on neighborhood streets, but would see a rise in delay at certain areas near freeway ramps. Overall, the project would improve community access in the Serra Mesa community and the Mission Valley community. Specific areas of vehicle congestion relief are discussed in the traffic report (see Appendix C) and Section 5.2, <i>Transportation and Circulation</i> , of this DEIR.	The proposed project is consistent with this goal.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Policy ME-C.1	<p>Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans.</p> <ul style="list-style-type: none"> a. Protect and seek dedication or reservation of right-of-way for planned transportation facilities through the planning and development review process. b. Implement street improvements and multimodal transportation improvements as needed with new development and as areas redevelop over time. c. Identify streets or street segments where special design treatments are desired to achieve community goals. e. Increase public input in transportation decision making, including seeking input from multiple communities where transportation issues cross community boundaries. 	<p>The Mission Valley Community Plan identifies the need for a street connection at I-805 and Phyllis Place to Mission Center Road and Qualcomm Way; the proposed project includes a street connection and, if implemented in the future, a street that would include automobile, pedestrian, and bicycle access to meet multimodal improvement standards.</p> <p>The residents of the Serra Mesa and Mission Valley community planning areas have been included in the public review process and solicited for review and comments on the DEIR for this project. Additionally, a public scoping meeting was held February 7, 2012, and the proposed project will be presented to the Serra Mesa Community Planning Group and the Mission Valley Community Planning Group.</p>	The proposed project is consistent with this policy.
Policy ME-C.2	Provide adequate capacity and reduce congestion for all modes of transportation on the street and freeway system.	Traffic impact studies have been prepared for the implementation of the proposed project (Appendix C) that analyze the project's transportation-related impacts on the adjacent communities. The proposed project would include a street connection that, if constructed, would alleviate community congestion in many areas, provide necessary emergency access points, and provide linkages for pedestrians, bicyclists, and motorists for the communities of Serra Mesa and Mission Valley.	The proposed project is consistent with this policy.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Policy ME-C.3	Design an interconnected street network within and between communities that includes pedestrian and bicycle access while minimizing landform and community character impacts.	The proposed project would include a street connection linking the communities of Serra Mesa and Mission Valley. Impacts on community character and landform would be minimal because the surrounding area is already developed with homes, streets, and a church.	The proposed project is consistent with this policy.
Policy ME-C.2.a	Identify locations where the connectivity of street networks could be improved through the community plan update and amendment process, the Regional Transportation Plan update process, and discretionary project review.	The proposed project identifies a location to connect street networks between two communities.	The proposed project is consistent with this policy.
Policy ME-K.4	Determine necessary transportation improvements to serve new development at the community plan level and, where necessary, at the project level.	The proposed project would include a street connection. The Lead Agency (i.e., the City Council) will ultimately determine if the proposed roadway connection would be necessary to serve existing and planned development.	The proposed project is consistent with this policy.
Urban Design Element			
Policy UD-A.2	Use open space and landscape to define and link communities. a. Link villages, canyons, open space and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, formalized parks, and/or natural open space, as appropriate.	The proposed project would include a street connection that, if constructed, would link the communities of Serra Mesa and Mission Valley.	The proposed project is consistent with this policy.

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Policy UD-B.5	<p>Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.</p> <ul style="list-style-type: none"> 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. 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. 	<p>The proposed project would include a street connection that, if constructed, would:</p> <ul style="list-style-type: none"> a. Link the current and future development in the community of Mission Valley to the community of Serra Mesa. b. Prevent the Quarry Falls site from being a closed-loop subdivision. c. Not include cul-de-sac elements. d. Facilitate pedestrian and bicycle connections. e. Be designed to City standards to ensure appropriate speeds. f. Provide a gateway from Serra Mesa to Mission Valley and vice versa. h. Not applicable. g. Clarify roadway intersections associated with the proposed project through the use of landscaping. i. Create a linkage between the communities of Serra Mesa and Mission Valley. No gates, walls, or other barriers would be used. 	<p>The proposed project is consistent with this policy.</p>

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Policy UD-C.6	<p>Design project circulation systems for walkability.</p> <ul style="list-style-type: none"> a. Extend existing street grid patterns into development within existing fine-grained neighborhoods. b. Design a grid or modified-grid internal project street system, with sidewalks and curbs, as an organizing framework for development in village centers. c. Provide pedestrian shortcuts through the developments to connect destinations where the existing street system has long blocks or circuitous street patterns. d. Use pedestrian amenities, such as curb extensions and textured paving, to delineate key pedestrian crossings. e. Design new connections and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations. f. Lay out streets to take advantage of and maximize vistas into public viewsheds. g. Share and manage commercial, residential, and public parking facilities where possible to manage parking for greater efficiency (see also Mobility Element, Section G). h. Incorporate design features that facilitate transit service along existing or proposed routes, such as bus pullout areas, covered transit stops, and multimodal pathways through projects to transit stops. 	<p>The proposed project would include a street connection between the communities of Serra Mesa and Mission Valley. This connection, if constructed, would remove connectivity barriers between the two areas.</p> <p>In addition, bicycle and pedestrian facilities would increase walkability in the area and accommodate pedestrian activity. The proposed project would also maximize the public viewshed of Mission Valley, as seen from Serra Mesa.</p>	<p>The proposed project is consistent with this policy.</p>

Policy/ Recommendation Number	Goal/Recommendation	Proposed Project	Proposed Project Consistency/ Inconsistency
Policy UD-C.7	Enhance the public streetscape for greater walkability and neighborhood aesthetics.	The proposed project would include a street connection to encourage greater walkability. Additionally, the implementation of the proposed project would provide additional ingress and egress to the adjacent Quarry Falls site, which would improve circulation in the immediate area and provide greater access throughout.	The project is consistent with this policy.
Conservation Element			
Policy CE-G.1	Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.	The proposed project, if implemented, would require mitigation prior to construction for impacts on the MSCP in the form of payment to the City of San Diego's Habitat Acquisition Fund, which is required for projects that impact sensitive habitats within the MSCP as indicated in Section 5.5, <i>Biological Resources</i> .	The proposed project is consistent with this policy.
Policy CE-G.2	Prioritize, fund, acquire, and manage open spaces that preserve important ecological resources and provide habitat connectivity.	The proposed project, if implemented, would require mitigation prior to construction to provide payment to the City of San Diego's Habitat Acquisition Fund as indicated in Section 5.5, <i>Biological Resources</i> .	The proposed project is consistent with this policy.

Table 5.1-2. Proposed Project's Consistency with the Serra Mesa Community Plan

Goal/ Recommendation Number	Goal/Objective/Proposal	Proposed Project	Proposed Project Conformance/ Nonconformance
Parks and Recreation Element			
Goals	To develop pedestrian and bicycle linkages connecting open space, neighborhood and community parks, schools, and shopping facilities.	The proposed project, if implemented, would include pedestrian and bicycle linkages.	The project is in conformance with this goal.
Proposals – Fire Protection	Evaluation of fire protection should be continued to assure adequate coverage in the community.	The proposed project, if implemented, would provide additional fire protection access and exit points.	The proposed project is in conformance with this proposal.
Proposals – Police Protection	The present response time should be continually evaluated. Police emphasis should be placed on protection of the community. Crime prevention, community relations, and crime-inhibiting design programs should be emphasized both in residential and in commercial/ industrial areas.	The proposed project, if implemented, would provide additional police protection access and exit points.	The proposed project is in conformance with this proposal.
Transportation Element			
Proposals – Streets and Highways	Hillside and canyon views should be preserved when new streets are constructed.	The proposed project, if implemented, would not include any buildings or objects to obstruct views from Phyllis Place looking out to Mission Valley.	The proposed project is in conformance with this proposal.
	Street widening and other improvements should be minimized and compatibility with the total landscape should be assured.	The proposed project, if implemented, would be not require significant cut into the hillside and would mimic the existing contours, avoiding unnecessary width expansions.	The proposed project is in conformance with this proposal.

Goal/ Recommendation Number	Goal/Objective/Proposal	Proposed Project	Proposed Project Conformance/ Nonconformance
Proposals – Bicycle Routes	A community bikeway system should be designed as shown on the Bikeways Map. This system should be developed so as to adequately serve the major bicycle traffic generators identified in the Plan and connect with the bicycle route systems in adjoining communities.	The proposed project, if implemented, would include a bicycle facility that would link Serra Mesa to the community of Mission Valley.	The proposed project is in conformance with this proposal.
	Means of improving transportation linkages and lessening the impact of motorized vehicular traffic on the environment should be considered. Two possibilities are the “bicycle park-bus ride” and “piggy back” bicycle-bus transportation concepts.	The proposed project, if implemented, would improve transportation linkages for bicycles between the Serra Mesa and Mission Valley Communities	The proposed project is in conformance with this proposal.
Environmental Management Element			
Goal	To manage the physical, biotic, and socioeconomic environment of the community in the context of the San Diego region to ensure improved quality of life, respect the environmental constraints, and preserve community resources for all residents and succeeding generations.	The proposed project would respect the site’s environmental constraints as it would not significantly alter the hillsides within the project site. The project’s grading includes the addition of fill to the side of the hillsides and would not involve cutting into the hillside. The proposed project would also mitigate for impacts on sensitive vegetation communities (disturbed coastal sage scrub).	The proposed project is in conformance with this goal.
Proposals	Open space should be preserved and hillsides conserved by rigorous development controls, as shown on the accompanying map. Open space and hillside conservation areas are limited to slopes of 25% or greater, that poses potential risks to development, and are otherwise environmentally sensitive.	The project site is located on a slope of 25% or greater and would therefore be subject to development controls, including the ESL Regulations. As previously detailed, the proposed project would not significantly alter the hillside through grading operations and would also include slope stability measures that	The proposed project is in conformance with this proposal.

Goal/ Recommendation Number	Goal/Objective/Proposal	Proposed Project	Proposed Project Conformance/ Nonconformance
		would be implemented as part of the proposed project design.	
	Any public improvements such as road, drainage channels, and utility services or any lessee development should be compatible with open space objectives. Public road improvements within open space areas are often not feasible due to the steep terrain and habitat preservation requirements; therefore, unimproved public road easements located within open space areas should be vacated and remain unbuilt. No through roads should be permitted to traverse designated open space.	The proposed project would include a street connection that would not occur within a designated open space area.	The proposed project is in conformance with this proposal.
Objective – Physical Environment – Urban Design	To preserve and enhance the physical environment, visual appearance, safety, identity, and character of the Serra Mesa community through aesthetic improvement and careful urban design.	This proposed project would include a street connection. No buildings or other actions are proposed that would impact the safety, identity, and character of the Serra Mesa and Mission Valley communities. Drought-tolerant landscaping would enhance the physical environment.	The proposed project is in conformance with this objective.
Proposal – Physical Environment – Urban Design	Diversity within neighborhoods should be encouraged to improve “sense of place” by varying the type of street surfaces, sidewalks, lights, signs and other street furniture, innovative yet tasteful remodeling, and individually distinctive landscaping.	The proposed project is partially located within the Quarry Falls site, which has a Specific Plan that details requirements for roadways that are developed within the site. The proposed roadway would conform to the design features within the Specific Plan, which intends to improve “sense of place” by providing a unifying design theme for the Quarry Falls project.	The proposed project is in conformance with this proposal.

5.1.5.2 Significance of Impact

As discussed in Tables 5.1-1 and 5.1-2, the proposed project would be consistent with the applicable goals, policies, guidelines, and recommendations contained within the existing General Plan, Serra Mesa Community Plan, and the Mission Valley Community Plan. As such, the proposed project would not result in a significant impact due to an inconsistency or conflict with the General Plan or the Serra Mesa Community Plan. Impacts would be less than significant.

5.1.5.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

5.1.6 Impact Analysis

Issue 3: MSCP Consistency

Would the proposed project conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

5.1.6.1 Impact Discussion

As described in Section 5.5, *Biological Resources*, the project site is not within the MHPA. Therefore, implementation of the proposed project would not conflict with the provisions of the MSCP or associated MHPA. Additionally, implementation of mitigation measures provided in Section 5.5, *Biological Resources*, would mitigate impacts on sensitive biological resources to a less-than-significant level. Therefore, the proposed project would be consistent with the MSCP. (Please also refer to Section 5.5 for additional discussion related to the City's MSCP.)

5.1.6.2 Significance of Impact

The project site is not within the City's MHPA boundaries. The proposed project would not result in a significant impact due to an inconsistency or conflict with the City's MSCP Subarea Plan and any applicable MHPA Adjacency Guidelines. In addition, the proposed project would not conflict with any adopted environmental plans. Impacts would be less than significant.

5.1.6.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

5.1.7 Impact Analysis

Issue 4: Community Division

Would the proposed project physically divide an established community?

5.1.7.1 Impact Discussion

The proposed project would include a roadway connection close to regional roadways and freeways (I-805) that, if constructed, would provide a direct connection between the Serra Mesa and Mission Valley community planning areas and more access options for regional trips. Serra Mesa and Mission Valley are currently ~~somewhat~~ divided in the vicinity of the project site due to intervening topography and steep slopes. As such, the street connection between the two adjacent communities would not divide an existing community but would help link them; thus, the proposed project would help achieve the General Plan goal of providing an interconnected street system that provides multiple linkages within and between communities. Impacts would be less than significant.

5.1.7.2 Significance of Impact

The proposed project would not result in the division of an established community, as it involves a roadway that would provide a linkage between the Serra Mesa and Mission Valley communities. Therefore, impacts would be less than significant.

5.1.7.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

5.1.8 Impact Analysis

Issue 5: ALUCP Consistency

Would the proposed project result in land uses which are not compatible with an adopted ALUCP?

5.1.8.1 Impact Discussion

The Montgomery Field ALUCP defines the project site as being outside the noise contours (60 decibels community noise equivalent level) and outside the airport's AIA – Review Area 1, which consists of locations where noise and safety concerns are pertinent to new development. The project site is within AIA – Review Area 2 (see Figure 5.1-3), which is limited to overflight and airspace factors. Therefore, the project is subject to additional criteria as specified in Section 5.1.2, as well as requirements for determinations by the Federal Aviation Administration and the San Diego County Regional Airport Authority in its role as the ALUC.

The proposed project would not include construction of vertical structures that may conflict with overflight zones or land uses established within the Montgomery Field ALUCP, and would not require a change to air station flight operations, approach minimums, or departure routes. Additionally, the proposed project would not interfere with aircraft communications systems, navigation systems, or other electrical systems. Furthermore, the implementation of the proposed

project would not involve reflective lighting that would interfere with aircrew vision, and would not include development uses that would attract birds or waterfowl such as landfills, feed stations, or certain types of vegetation. For the above-stated reasons, the project would not conflict with the ALUCP for Montgomery Field.

5.1.8.2 Significance of Impact

The project would not result in land uses that are incompatible with an adopted ALUCP; impacts would be less than significant.

5.1.8.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

5.2 Transportation and Circulation

This section analyzes transportation and circulation conditions in the vicinity of the project site, including roadway, intersection, and freeway capacity in relation to vehicle traffic. It also analyzes how the project would affect alternative modes of transportation, potential traffic hazards, and community travel times.

The following discussion summarizes the *Serra Mesa CPA Street Connection Traffic Technical Report* (traffic study) prepared by Chen Ryan Associates in September 2016, included as Appendix C to this DEIR. The traffic study utilized data from the previous traffic study, *Franklin Ridge Road Connection Traffic Impact Study*, which was prepared by KOA Corporation in January 2015. The previous traffic study prepared by KOA Corporation is included as an appendix to the traffic study.

There were two relevant CEQA cases addressing the types of analysis scenarios to be included in an EIR: (1) *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (6th Dist. 2010) 190 Cal. App.4th 1351 (Sunnyvale West), and (2) *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 5 Cal. 4th 439 (Neighbors). The decision in the first CEQA case indicated that changes associated with a project should be compared to the existing conditions baseline only to establish project-related impacts, which generally is the time the Notice of Preparation is issued. However, the California Supreme Court ruled in the second case that a future year baseline can be justified if substantial evidence in the administrative record supports a conclusion that an analysis based on existing conditions would be misleading or without informational value to decision-makers and future users of the EIR.

As previously detailed in Chapter 2, *Environmental Setting*, traffic counts were collected in 2011 and verified in 2013 to represent the existing conditions. However, consistent with the Neighbors decision, the existing conditions are provided for informational purposes and are not used to determine project-related impacts. Rather, the impact analysis uses the reasonably foreseeable near-term traffic conditions modeled for the Near-Term Scenario (Year 2017) as the baseline. This is a more conservative and more accurate approach than using the existing conditions because the Near-Term Scenario takes into account projects that have been implemented since 2013. In addition, it is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented. If the existing conditions were used in place of the future near-term conditions, projects that are under construction, planned for construction, or otherwise recently operational would not be factored into the project impact analysis. Accordingly, consistent with the Neighbors decision, traffic conditions for the Near-Term Scenario are considered the near-term baseline conditions for CEQA purposes and are used as a basis for determining project-related traffic impacts.

5.2.1 Existing Conditions

5.2.1.1 Study Area

Transportation and circulation related to the proposed project would affect roadway segments and intersections surrounding the project site under the jurisdiction of the City of San Diego. It would

also affect metered freeway ramps and freeway mainline segments under the jurisdiction of the California Department of Transportation (Caltrans). As such, the study area was defined according to the City's *Traffic Impact Study Manual* (1998) requirements. The *Traffic Impact Study Manual* requires that a study area include all roadway segments, intersections, and freeway segments where the project would contribute 50 or more peak hour trips in either direction. Figure 5.2-1 shows the project study area roadway segments and intersections. The traffic study area that was analyzed consists of 29 roadway segments, 19 existing and 5 future intersections, 3 freeway mainline segments, and 2 metered freeway ramps. The traffic study area is bordered generally by Aero Drive to the north, Rio San Diego Drive to the south, and Mission Center Road and Northside Drive to the west and east, respectively.

Roadway Corridors

Several regionally and locally significant roadways and freeways traverse the study area (Figure 5.2-2). Each of the key transportation facilities is discussed below.

East-West Roadway Facilities

Friars Road is an east-west regionally significant arterial that runs from the Navajo community to the east, where it becomes Mission Gorge Road and heads east into Santee, to Sea World Drive in Mission Bay to the west. Friars Road provides direct access to Qualcomm Stadium, Hazard Center, and Fashion Valley Mall. Within the project study area, Friars Road functions as a six-lane Expressway from Frazee Road to River Run Road, and a six-lane Prime Arterial from River Run Drive to Northside Drive. Friars Road has an ultimate classification of a six-lane Expressway from Frazee Road to Interstate (I) 15 per the Mission Valley Community Plan. Parking is prohibited on Friars Road within the project study area. Friars Road has Class II bike lanes. The speed limit is 50 miles per hour (mph).

Rio San Diego Drive runs east/west parallel to Friars Road, ultimately feeding back into Friars Road along cross-streets. The roadway functions as a four-lane Major roadway, which is also its ultimate classification per the Mission Valley Community Plan. Rio San Diego Drive has two lanes in each direction, a two-way left turn lane, and a center median at Qualcomm Way. Rio San Diego Drive becomes Fenton Marketplace Driveway at Fenton Parkway, then terminates at Northside Drive. Parking is permitted along both sides of Rio San Diego Drive within the project study area, from Qualcomm Way to Rio Bonito Way. Rio San Diego Drive does not have any bicycle facilities within the study area and does not serve any Metropolitan Transit System (MTS) bus routes.

Civita Boulevard¹ is a roadway that runs east-west and services the Quarry Falls development with two lanes in each direction and a center median. It becomes Mission Valley Road west of Mission Center Road, and Russell Parkway to the east where it curves south and terminates at Friars Road.

North-South Roadway Facilities

Mission Center Road is a north-south arterial that connects the Serra Mesa Community to Friars Road and eventually to I-8. It functions as a four-lane Major Arterial between Mission Center Court and Friars Road, with an ultimate classification as a six-lane Major. Mission Center Road then functions as a five-lane Major Arterial between Friars Road and Mission Valley Road. From Mission

¹ This roadway was originally called "Quarry Falls Boulevard" in the Quarry Falls PEIR, but has since been renamed along with the project. It is referred to as Civita Boulevard throughout this document.



Source: KOA Corporation, 2015.

Figure 5.2-1
Traffic Impact Study Area

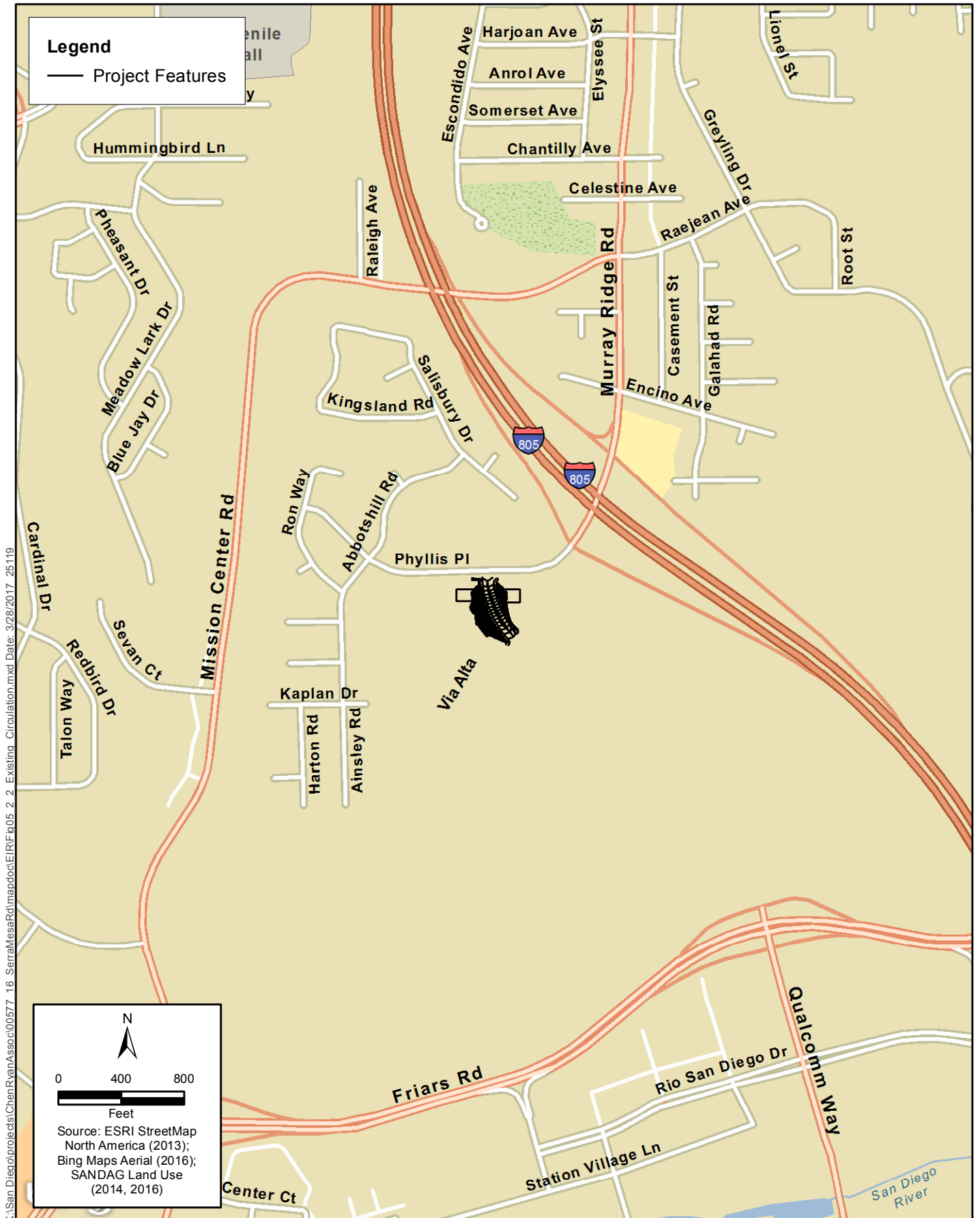


Figure 5.2-2
Existing Circulation Network

Valley Road to Sevan Court, Mission Center Road/Civita Boulevard functions as a four-lane Major, which is also its ultimate classification. Lastly, Mission Center Road/Civita Boulevard then continues north as a three-lane Collector from Sevan Court to the I-805 overpass and a two-lane Collector with no fronting property to Murray Ridge Road, with an ultimate classification along this segment of a four-lane Collector. Mission Center Road provides access to the project site, and the speed limit is 35 mph. Parking is prohibited along Mission Center Road. Mission Center Road has Class II bike lanes and MTS bus route 928.

Phyllis Place/Murray Ridge Road runs in a northeasterly direction. Currently it functions as a two-lane collector from Abbotshill Road to Pinecrest Avenue where Phyllis Place becomes Murray Ridge Road north of Encino Avenue. Its ultimate classification in the Serra Mesa Community Plan (2011) is a four-lane Major. Murray Ridge Road provides the Serra Mesa Community access to I-805 and Mission Valley (via Mission Center Road). Parking currently exists on both sides for the majority of Phyllis Place and Murray Ridge Road. Murray Ridge Road also has Class II bike lanes and MTS bus route 928.

Via Alta is currently the primary entrance to the residential uses that have been constructed within the northwestern portion of the Quarry Falls site. It begins at the south from Westside Drive and runs in a northeasterly direction where it meets with Franklin Ridge Road. The roadway functions as a two-lane Major Arterial and has a landscaped median and left-turn pockets throughout. The roadway provides Class II bike lanes in both directions.

Franklin Ridge Road was not constructed as of the time this writing (2017). It is assumed to be constructed for the Near-Term Scenario analyzed within Section 5.2.4, below. From Via Alta, it would run in a southeasterly direction to Civita Boulevard. This roadway would function as a two-lane Major Arterial and, similar to Via Alta, would have a landscaped median and left-turn pockets throughout. The roadway would provide Class II bike lanes in both directions.

Qualcomm Way runs north-south from I-8 to Friars Road and provides direct access to the Quarry Falls development project site. The roadway functions as a six-lane Major, which is also its ultimate classification. Raised medians and left-turn lanes at signalized intersections are provided. Parking along Qualcomm Way is prohibited. The roadway provides Class II bike lanes in both directions and the speed limit is 40 mph.

Sandrock Road runs north-south connecting the community of Serra Mesa to the community of Kearny Mesa at Aero Drive. The roadway functions as a two-lane Collector with a continuous center turn lane. Sandrock Road has an ultimate classification of a four-lane Major street per the Serra Mesa Community Plan. There are no existing bus routes that travel along Sandrock Road within the study area. Parking is permitted on both sides of the street and Class II buffered bike lanes currently exist along both sides of the roadway. The roadway provides access to commuters within the study area. The posted speed limit of Sandrock Road from Murray Ridge Road to Aero Drive is 35 mph.

Freeway Facilities

I-805 is a north-south facility splitting from I-5 in Sorrento Valley and running parallel to I-5 to just north of the US-Mexico International Border, where the freeways merge back together. The freeway is maintained and operated by Caltrans. I-805 has nine to ten mixed-flow/general purpose lanes (five northbound lanes, five to six southbound lanes) and varying auxiliary lanes throughout the study area. It is accessible via the Phyllis Place/Murray Ridge Road interchange within the study area.

Existing Intersections

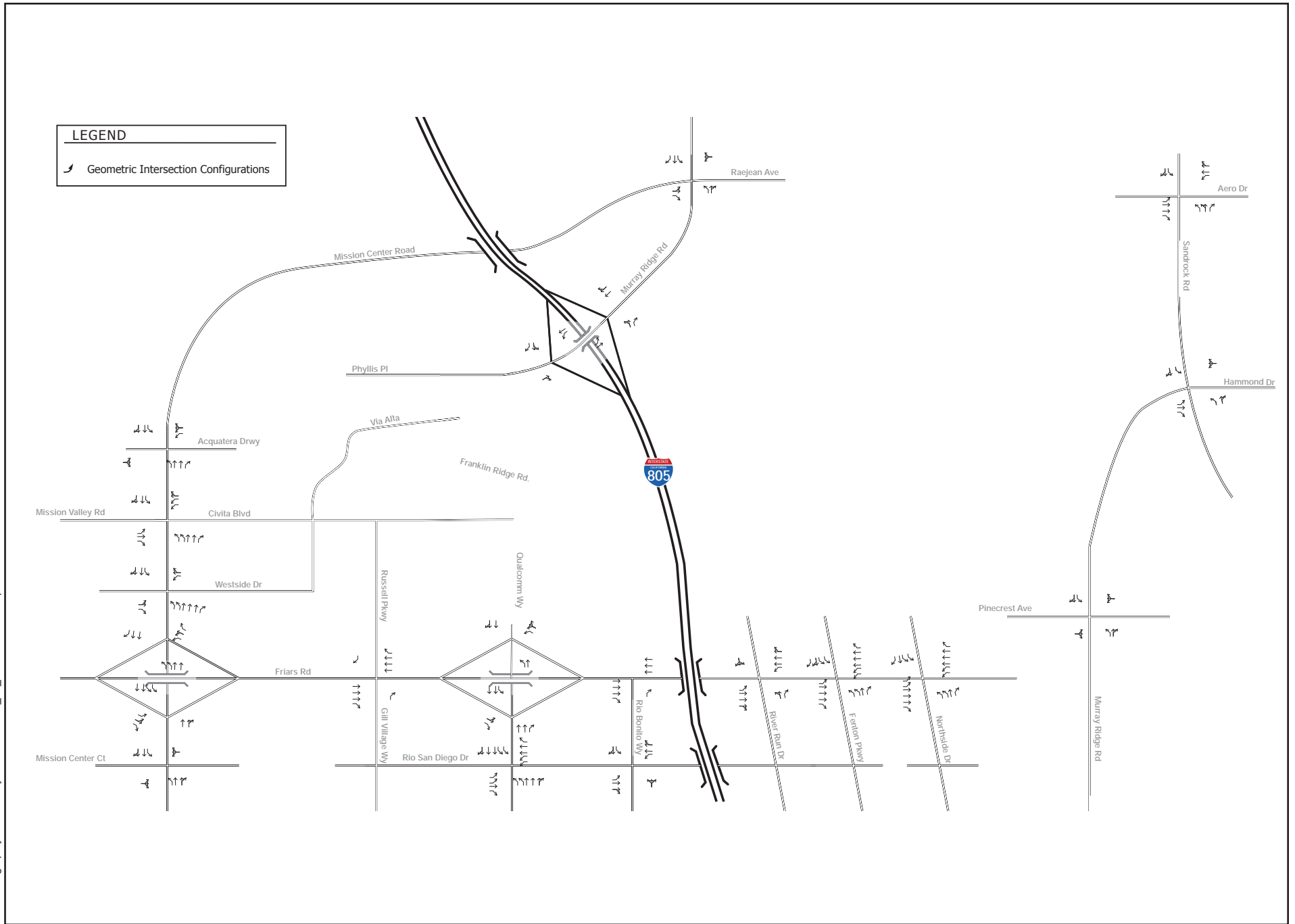
The study area includes existing and future intersections, roadway segments, and freeway segments. Figure 5.2-34 shows the existing intersection configurations within the study area. The following key study area existing intersections were analyzed for the project. It should be noted that the numbering below correlates to the numbers on Figure 5.2-1.

1. Friars Road and River Run Road
2. Friars Road and Fenton Parkway
3. Friars Road and Northside Drive
4. Mission Center Road and Murray Ridge Road/Phyllis Place
5. Mission Center Road and Aquatera Driveway
6. Mission Center Road and Mission Valley Road (Civita Boulevard)
7. Mission Center Road and Westside Drive (Mission Center Driveway)
8. Mission Center Road and Friars Road eastbound (EB) ramps
9. Mission Center Road and Friars Road westbound (WB) ramps
10. Mission Center Road and Mission Center Court
11. Aero Drive and Sandrock Road
12. Murray Ridge Road and Sandrock Road
13. Murray Ridge Road and Pinecrest Avenue
14. I-805 northbound (NB) ramps and Murray Ridge Road
15. I-805 southbound (SB) ramps and Phyllis Place
16. Qualcomm Way and Friars Road EB ramps
17. Qualcomm Way and Friars Road WB ramps
18. Qualcomm Way and Rio San Diego Drive
19. Rio San Diego Drive and Rio Bonito Way

Future Intersections

The following key study area “future” intersections were analyzed for the project. These roadways are associated with the Quarry Falls project. It should be noted that some of these intersections have been constructed since the existing conditions were developed (2013) and are assumed to be constructed in the Near-Term Scenario (Year 2017).

20. Phyllis Place and Franklin Ridge Road
21. Via Alta and Franklin Ridge Road
22. Via Alta and Civita Boulevard (previously named Quarry Falls Boulevard)
23. Civita Boulevard and Russell Parkway (Gill Village Way)
24. Qualcomm Way and Civita Boulevard



Source: KOA Corporation, 2015.

Figure 5.2-3
Existing Intersection Configurations

Roadway Segments

The following study area roadway segments were analyzed for the project.

1. Civita Boulevard between Mission Center Road and Via Alta
2. Civita Boulevard between Via Alta and Russell Parkway
3. Civita Boulevard between Russell Parkway and Qualcomm Way
4. Civita Boulevard between Qualcomm Way and Franklin Ridge Road intersections
5. Franklin Ridge Road between Via Alta and Civita Boulevard
6. Franklin Ridge Road between Via Alta and Phyllis Place
7. Friars Road between Mission Center Road and Qualcomm Way
8. Friars Road between Qualcomm Way and River Run Drive
9. Friars Road between Fenton Parkway and Northside Drive
10. Mission Center Road between Hazard Center Drive and Friars Road
11. Mission Center Road between Friars Road to Westside Drive (Mission Center Driveway)
12. Mission Center Road between Westside Drive (Mission Center Driveway) and Mission Valley Road
13. Mission Center Road between Mission Valley Road and Aquatera Driveway
14. Mission Center Road between Aquatera Driveway and Murray Ridge Road
15. Murray Ridge Road between I-805 NB ramps and Mission Center Road
16. Murray Ridge Road between Mission Center Road and Pinecrest Avenue
17. Murray Ridge Road between Pinecrest Avenue and Sandro Rock Road
18. Phyllis Place between Abbotshill Road and Franklin Ridge Road
19. Phyllis Place between Franklin Ridge Road and I-805 SB ramps
20. Phyllis Place between I-805 SB ramps and I-805 NB ramps
21. Qualcomm Way between Civita Boulevard and Friars Road WB ramps
22. Qualcomm Way between Friars Road WB ramps and Friars Road EB ramps
23. Qualcomm Way between Friars Road EB ramps and Rio San Diego Drive
24. Rio San Diego Drive between Qualcomm Way and Rio Bonito Way
25. Russell Parkway between Civita Boulevard and Friars Road
26. Sandro Rock Road between Murray Ridge Road and Aero Drive
27. Via Alta between Franklin Ridge Road and Civita Boulevard
28. Via Alta between Civita Boulevard and Westside Drive (Mission Center Driveway)
29. Westside Drive (Mission Center Driveway) between Mission Center Road and Via Alta

Freeway Mainline Segments

The following freeway mainline segments were analyzed for the project.

1. I-805 between State Route (SR) 163 and Mesa College Drive
2. I-805 between Mesa College on-ramps and Murray Ridge Road
3. I-805 between Murray Ridge Road and I-8

Metered Freeway Ramps

The following freeway ramps were analyzed for the project.

1. I-805 at Phyllis Place SB ramp/Phyllis Place
2. I-805 at Phyllis Place NB ramp/Phyllis Place

5.2.1.2 Existing Transportation Conditions

Traffic operations at the intersections, roadway segments, and freeway ramps identified above were assessed under the existing conditions analysis in the traffic study. To determine the existing traffic volumes at the study intersections, intersection movement counts were taken on a typical weekday during the morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) peak periods in May 2011. Average daily traffic (ADT) volumes were also collected along the study roadway segments over a 24-hour period during the months of May and June in 2011. Additional ADT counts were taken in June 2013 to verify and confirm that the counts taken in 2011 were still valid. Existing peak-hour traffic volumes and existing ADT volumes, including the comparison between the 2011 and 2013 counts, are included in Appendix C.

Roadway Segments

To determine if a roadway segment is operating effectively, a level of service (LOS) grade is applied. LOS is an index used to quantitatively evaluate the operational quality of the roadway segments in the study area. LOS on roadway segments is determined by the ratio of the roadway's volume divided by its design capacity, a metric known as volume to capacity (V/C) ratio. LOS takes into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety, and expresses these conditions using a letter-graded scale, with "A" representing free flow and "F" representing considerable congestion and delay. Table 5.2-1 provides a more detailed explanation of varying LOS.

Table 5.2-1. Level of Service Definitions

LOS Category	Definition of Operation
A	This LOS represents a completely free-flow condition, where the operation of vehicles is virtually unaffected by the presence of other vehicles and only constrained by the geometric features of the highway and by driver preferences.
B	This LOS represents a relatively free-flow condition, although the presence of other vehicles becomes noticeable. Average travel speeds are the same as in LOS A, but drivers have slightly less freedom to maneuver.
C	At this LOS the influence of traffic density on operations becomes marked. The ability to maneuver within the traffic stream is clearly affected by other vehicles.
D	At this LOS, the ability to maneuver is notably restricted due to traffic congestion, and only minor disruptions can be absorbed without extensive queues forming and the service deteriorating.
E	This LOS represents operations at or near capacity. LOS E is an unstable level, with vehicles operating with minimum spacing for maintaining uniform flow. At LOS E, disruptions cannot be dissipated readily, thus causing deterioration down to LOS F.
F	At this LOS, forced or breakdown of traffic flow occurs; although operations appear to be at capacity, queues form behind these breakdowns. Operations within queues are highly unstable, with vehicles experiencing brief periods of movement followed by stoppages.
Source: Transportation Research Board 2010	

Roadway segment capacity within the project study area is based on the City of San Diego's *Traffic Impact Study Manual* (1998), and provided as Table 5.2-2. The City considers LOS D an acceptable LOS for roadway operations.

Table 5.2-2. Roadway Classifications and LOS Standards

Roadway Classification	LOS A	LOS B	LOS C	LOS D	LOS E
Expressway	30,000	42,000	60,000	70,000	80,000
Prime Arterial	25,000	35,000	50,000	55,000	60,000
Major Arterial (6-lane, divided)	< 20,000	< 28,000	< 40,000	< 45,000	< 50,000
Major Arterial (4-lane, divided)	< 15,000	< 21,000	< 30,000	< 35,000	< 40,000
Collector (4-lane w/ center lane)	< 10,000	< 14,000	< 20,000	< 25,000	< 30,000
Collector (4-lane w/o center lane)	< 5,000	< 10,000	< 13,000	< 15,000	< 20,000
Collector (2-lane w/ continuous left-turn lane)	< 5,000	< 10,000	< 13,000	< 15,000	< 20,000
Collector (2-lane no fronting property)	< 4,000	< 5,500	< 7,500	< 9,000	< 10,000
Collector (2-lane commercial-industrial fronting)	< 2,500	< 3,500	< 5,000	< 6,500	< 8,000
Collector (2-lane multi-family)	< 2,500	< 3,500	< 5,000	< 6,500	< 8,000
Sub-Collector (2-lane single family)	-	-	2,200	-	-
Source: City of San Diego 1998					

Existing conditions were determined for roadway segments within the study area. As summarized in Table 5.2-3, all study area segments currently operate at LOS D or better except for the following.

- Mission Center Road between Aquatera Driveway and Murray Ridge Road (LOS E)
- Murray Ridge Road between I-805 NB ramp and Mission Center Road (LOS F)
- Murray Ridge Road between Mission Center Road and Pinecrest Avenue (LOS E)

Table 5.2-3. Roadway Segments: Existing Conditions

Roadway	Segment	Existing Conditions				
		Lanes/ Functional Class	Capacity	ADT	V/C	LOS
Friars Rd	Mission Center Rd to Qualcomm Wy	6E	80,000	33,219	0.415	B
	Qualcomm Wy to Fenton Pkwy	6E	80,000	36,466	0.456	B
	Fenton Pkwy to Northside Dr	6P	60,000	34,886	0.581	B
Mission Center Rd	Hazard Center Dr to Friars Rd	4M	40,000	20,827	0.521	B
	Friars Rd to Mission Center Drwy (Westside Dr)	5M	45,000	22,759	0.506	B
	Mission Center Drwy (Westside Dr) to Mission Valley Rd	5M	45,000	20,013	0.445	B
	Mission Valley Rd to Aquatera Drwy	4M	40,000	9,035	0.226	A
	Aquatera Drwy to Murray Ridge Rd	2C NF	10,000	9,035	0.904	E
Murray Ridge Rd	I-805 NB ramp to Mission Center Rd	2C CL	15,000	17,441	1.163	F
	Mission Center Rd to Pinecrest Ave	2C CL	15,000	14,074	0.938	E
	Pinecrest Ave to Sandrock Rd	2C CL	15,000	9,502	0.633	C
Phyllis Pl	Abbotshill Rd to I-805 SB ramp	2C NF	10,000	2,420	0.242	A
	I-805 SB ramp to I-805 NB ramp	2C CL	15,000	10,770	0.718	D
Qualcomm Wy	Civita Blvd to Friars Rd WB ramp	6M	50,000	1,858	0.037	A
	Friars Rd WB ramp to Friars Rd EB ramp	6M	50,000	9,367	0.187	A
	Friars Rd EB ramp to Rio San Diego Dr	6M	50,000	14,050	0.281	A
Rio San Diego Dr	Qualcomm Wy to Rio Bonito Wy	4C	30,000	18,420	0.614	C
Sandrock Rd	Murray Ridge Rd to Aero Dr	2C CL	15,000	10,686	0.712	D

Source: Appendix C

2C CL = 2-lane Collector with a continuous left-turn lane; 2C NF = 2-lane Collector with no fronting property; 4C = 4-lane Collector; 4M = 4-lane Major Street; 5M = 5-lane Major Street; 6E = 6-lane Expressway; 6P = 6-lane Prime Arterial

Intersections

The *Highway Capacity Manual 2010* (Transportation Research Board 2010) defines LOS in terms of delay or, more specifically, average stopped delay per vehicle. Delay is a measure of driver and/or passenger discomfort, frustration, fuel consumption, and lost travel time. This technique uses 1,900 vehicles per hour per lane as the maximum saturation volume of an intersection. This saturation

volume is adjusted to account for lane width, on-street parking, pedestrians, traffic composition (i.e., percentage of trucks), and shared lane movements (i.e., through and right-turn movements originating from the same lane). The LOS criteria used for signalized intersections is described in Table 5.2-4. The City considers LOS D or better during the AM and PM peak hours to be acceptable for intersection LOS.

Table 5.2-4. Signalized Intersection LOS Criteria

Average Stopped Delay Per Vehicle (seconds)	Level of Service Characteristics
<10.0	<i>LOS A</i> describes operations with very low delay. This occurs when progression is extremely favorable, and most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
10.1–20.0	<i>LOS B</i> describes operations with generally good progression and/or short cycle lengths. More vehicles stop than for <i>LOS A</i> , causing higher levels of average delay.
20.1–35.0	<i>LOS C</i> describes operations with higher delays, which may result from fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.
35.1–55.0	<i>LOS D</i> describes operations with high delay, resulting from some combination of unfavorable progression, long cycle lengths, or high volumes. The influence of congestion becomes more noticeable, and individual cycle failures are noticeable.
55.1–80.0	<i>LOS E</i> is considered the limit of acceptable delay. Individual cycle failures are frequent occurrences.
>80.0	<i>LOS F</i> describes a condition of excessively high delay, considered unacceptable to most drivers. This condition often occurs when arrival flow rates exceed the <i>LOS D</i> capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay.
Source: Transportation Research Board 2010	

Existing peak-hour intersection conditions were determined for intersections within the study area. LOS analysis focused on peak hour intersection operations, which is the time of the day when traffic is at its heaviest. As shown in Table 5.2-5, all study area intersections currently operate at LOS D or better.

Table 5.2-5. Intersections: Existing Peak-Hour Conditions

Intersection	Peak	Existing Conditions	
		Delay (sec.)	LOS
1. Friars Rd and River Run Rd	AM	10.8	B
	PM	14.6	B
2. Friars Rd and Fenton Pkwy	AM	20.8	C
	PM	24.1	C
3. Friars Rd and Northside Dr	AM	17.1	B
	PM	43.4	D
4. Mission Center Rd and Murray Ridge Rd/Phyllis Pl	AM	29.6	C
	PM	29.5	C
5. Mission Center Rd and Aquatera Drwy	AM	16.0	B
	PM	15.7	B
6. Mission Center Rd and Mission Valley Rd (Civita Blvd)	AM	19.0	B
	PM	22.1	C
7. Mission Center Rd and Westside Dr (Mission Center Drwy)	AM	16.6	B
	PM	17.1	B
8. Mission Center Rd and Friars Rd/EB ramps	AM	8.5	A
	PM	12.6	B
9. Mission Center Rd and Friars Rd/WB ramps	AM	9.1	A
	PM	11.3	B
10. Mission Center Rd and Mission Center Ct	AM	13.9	B
	PM	23.5	C
11. Aero Dr and Sandrock Rd	AM	8.6	A
	PM	7.7	A
12. Murray Ridge Rd and Sandrock Rd	AM	17.6	B
	PM	17.6	B
13. Murray Ridge Rd and Pinecrest Ave	AM	13.8	B
	PM	14.0	B
14. Murray Ridge Rd and I-805 NB ramp	AM	8.8	A
	PM	10.0	A
15. Murray Ridge Rd and I-805 SB ramp	AM	14.0	B
	PM	19.8	B
16. Qualcomm Wy and Friars Rd EB ramp	AM	10.8	B
	PM	10.4	B
17. Qualcomm Wy and Friars Rd WB ramp	AM	19.0	B
	PM	20.4	C
18. Qualcomm Wy and Rio San Diego Dr	AM	12.5	B
	PM	21.0	C
19. Rio San Diego Dr and Rio Bonito Wy	AM	14.6	B
	PM	15.4	B
Source: Appendix C			

Freeway Ramp Meter Analysis

Ramp meter analysis was conducted on I-805 SB and NB ramps at Murray Ridge Road. The ramp meter rates were provided by Caltrans in January 2015. The analysis performed is based on using the median ramp meter rate. The existing ramp meter analysis under existing conditions is summarized in Table 5.2-6.

Table 5.2-6. Ramp Meters: Existing Conditions

Ramp Location	Meter Rate¹ (veh/hr)²	Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)³	Queue (feet)⁴
AM Peak Hour					
Murray Ridge – I-805 NB on-ramp	851	299	0	0	0
PM Peak Hour					
Murray Ridge – I-805 SB on-ramp	691	520	0	0	0
Murray Ridge – I-805 SB on-ramp (HOV)	691	58	0	0	0
Source: Appendix C					
¹ Meter rate is based on the median meter rate provided by Caltrans in January 2015.					
² Veh/hr = vehicles per hour					
³ Delay = (demand – meter rate)/meter rate * 60 minutes/hour					
⁴ Queue = excess demand * 25 feet/vehicle					
HOV = high-occupancy vehicle					

As shown in Table 5.2-6, under existing conditions, there is no observed delay or queue on any of the existing ramps because the ramp meter rates are greater than the vehicle demand rates.

Freeway Mainline Segments

In September 2016, Caltrans approved its Local Development – Intergovernmental Review Program Interim Guidance (Interim Guidance; Caltrans 2016). The Interim Guidance provides direction to help ensure that Caltrans aligns with State policy through the use of efficient development patterns, innovative demand reduction strategies, and necessary multimodal improvements. The Interim Guidance will remain in effect until superseded by the Caltrans Transportation Analysis Guide and Transportation Impact Study Guidelines, currently under development, which will help implement Caltrans Strategic Management Plan 2015–2020 consistent with Senate Bill 743.

The Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing vehicle miles traveled (VMT) on the regional circulation network. The proposed project is a mobility project that would provide a multi-modal connection between two communities that currently lack connectivity. No new trips would be added to the regional circulation network with the proposed project; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition.

As previously detailed at the beginning of this EIR section, the impact analysis utilizes traffic conditions modeled for Year 2017 as the basis for comparing potential traffic impacts associated with the proposed project because it represents the soonest the proposed project could be operational. As such, traffic conditions for Year 2017 would provide a more accurate representation of the direct traffic impacts of the proposed project because they take into account development that has occurred since 2013. Accordingly, traffic conditions for Year 2017 are considered the near-term baseline conditions for CEQA purposes and are similarly used as a basis for comparison of VMT.

Appendix H to this EIR includes the methodology and results of the VMT analyses conducted for the proposed project, which include both a study area VMT analysis and a region-wide (i.e., San Diego County) VMT analysis. As detailed in Appendix H, the existing VMT (Year 2013) for the study area is 424,754, while the region-wide total is 1,422,612. The VMT for the near-term baseline condition (i.e., Year 2017 without the project) is 531,382 within the study area and 1,523,630 for the region.

The following information regarding LOS and V/C ratios is shown for informational purposes. As shown in Table 5.2-7, the corresponding LOS represents an approximation of existing or anticipated future freeway operating conditions in the peak direction of travel during the peak hour. LOS D or better is considered acceptable freeway operations.

Table 5.2-7. Freeway Segment LOS Criteria

LOS	V/C	Congestion/Delay	Traffic Description
<i>Used for freeways, expressways and conventional highways</i>			
A	<0.30	None	Free flow.
B	0.31–0.50	None	Free to stable flow, light to moderate volumes.
C	0.51–0.71	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted.
D	0.71–0.89	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
E	0.90–1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
<i>Used for conventional highways</i>			
F	>1.00	Considerable	Forced or breakdown flow. Delay measured in average travel speed (mph). Signalized segments experience delays >60.0 seconds/vehicle.
Source: Appendix C			

For informational purposes, existing peak-hour freeway conditions were determined for mainline freeway segments within the study area. Table 5.2-8 shows the existing freeway segment annual average daily traffic volumes. As shown, all study freeway segments currently operate at LOS D or better with the exception of the following.

- I-805 NB from Murray Ridge Road to Mesa College Drive on-ramp (LOS F, AM peak hour)
- I-805 NB from I-8 to Murray Ridge Rd. (LOS F, AM peak hour)
- I-805 SB from Mesa College Drive on-ramp to Murray Ridge Road (LOS F, PM peak hour)

Table 5.2-8. Freeway Mainline Segments: Existing Conditions

Segment	Peak Hour	LOS E Capacity	PHV	V/C	LOS
I-805 Northbound					
Mesa College Dr on-ramp to SR-163	AM	11,200	10,294	0.916	D
	PM	11,200	5,180	0.463	B
Murray Ridge Rd to Mesa College Dr on-ramp	AM	11,200	11,625	1.038	F
	PM	11,200	5,866	0.524	B
I-8 to Murray Ridge Rd	AM	11,200	11,834	1.057	F
	PM	13,000	5,972	0.533	B
I-805 Southbound					
SR-163 to Mesa College Dr on-ramp	AM	11,200	4,454	0.398	A
	PM	11,200	10,177	0.909	D
Mesa College Dr on-ramp to Murray Ridge Rd	AM	11,200	5,044	0.450	B
	PM	11,200	11,526	1.029	F
Murray Ridge Rd to I-8	AM	11,200	5,135	0.395	A
	PM	13,000	11,734	0.903	D
Source: Appendix C					
PHV = Peak Hour Volume ((ADT)(K)(D)/(Truck Factor))					

Existing Transit

Transit opportunities in the vicinity of the project site include bus service and the trolley, both of which are operated by MTS. There are numerous bus routes that serve both communities, but also provide access to the Fashion Valley Transit Center, where commuters can then board the trolley.

Several bus routes traverse the Mission Valley and Serra Mesa communities (see Figure 2-5); however, the most pertinent to the vicinity of the project site include MTS bus routes 25 and 928. MTS route 25 runs from the Fashion Valley Transit Center northeast through Linda Vista, Mesa College, along Aero Drive in Serra Mesa, east to Tierrasanta, then back west ending at Kearny Mesa Transit Center. MTS route 928 also begins at the Fashion Valley Transit Center and runs northeast toward the vicinity of the project site via Mission Center Road, through Serra Mesa via Murray Ridge Road, then eventually north to the Kearny Mesa Transit Center via Ruffin Road.

The MTS trolley system's Green Line service runs through Mission Valley connecting Old Town and Downtown San Diego with Qualcomm Stadium, San Diego State University, and cities to the east. Within Mission Valley, the Green Line runs parallel to and along Friars Road with stops at Fashion Valley Transit Center, Mission Center Road/Hazard Center Drive, Mission Valley Center, Qualcomm Way (Rio Vista), Fenton Parkway, and Qualcomm Stadium. The MTS Green Line also connects with the Blue Line and Orange Line in Downtown San Diego to connect with the San Diego/Mexico border and Southeast San Diego, Lemon Grove, and La Mesa. Extension of the system is planned for a northerly route to the University of California at San Diego and to University Towne Center in the next few years.

There are two trolley stations in the vicinity of the project site (see Figure 2-5): the Rio Vista Station and the Mission Valley Center Station. The Rio Vista Station is not currently served by any MTS bus routes and does not have any dedicated parking for transit users. The Mission Valley Center Station is served by MTS bus route 6, which runs from Fashion Valley to North Park via Camino de la Reina, Texas Street, and El Cajon Boulevard. There is no dedicated parking for transit users at the Mission Valley Center Station.

Pedestrian and Bicycle Circulation

Pedestrian facilities are provided as sidewalks and multi-use trails. Bicycle opportunities are provided by bikeways. The City has three classifications for bikeways: Class I (Bike Path or Trail), Class II (Bike Lane), and Class III (Bike Route). A Class I bike path/trail is designated along Friars Road west of Fashion Valley Road; a Class II bike lane is provided along Friars Road east of Fashion Valley Road. Additionally, there are Class II bike lanes along Mission Center Road and Qualcomm Way. Class I paths for both pedestrians and bicyclists have been developed within the San Diego River open space corridor. Within the immediate project vicinity, pedestrian and bicycle access currently exists from Aperture Circle in Quarry Falls to the Serra Mesa community via Kaplan Drive. However, no designated bikeways or sidewalks are provided along this connection.

5.2.2 Regulatory Framework

5.2.2.1 State

California Department of Transportation

Caltrans has jurisdiction over the state highway system and is divided into 12 districts. They are responsible for the construction and maintenance of the state highway system. Caltrans establishes acceptable freeway and on- and off-ramp operations based on the Transportation Research Board's *Highway Capacity Manual 2010* (Transportation Research Board 2010).

As discussed above, in September 2016, Caltrans approved the Interim Guidance, which is intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing VMT on the regional circulation network.

Assembly Bill 1358 – California Complete Streets Act of 2008

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (Assembly Bill 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multimodal perspective, including public transit, walking, and biking components.

Senate Bill 743

Senate Bill 743 mandates a change in the way that public agencies evaluate transportation impacts of projects under CEQA, focusing on VMT rather than LOS or other delay-based metrics. SB 743 states that new methodologies under CEQA are needed for evaluating transportation impacts that are better able to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing

clean, efficient access to destinations. It also requires that an update to the CEQA Guidelines occur to reflect these changes. As of January 2017, the Governor's Office of Planning and Research and the Natural Resources Agency have not finalized the update to the CEQA Guidelines.

5.2.2.2 Local

San Diego Association of Government's San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan) was adopted by the San Diego Association of Governments (SANDAG) Board of Directors on October 9, 2015, to establish a long-range blueprint for the San Diego region's growth and development through the year 2050. The Regional Plan was developed in close partnership with the region's 18 cities and the County government, and aims to provide innovative mobility choices and planning to support a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. The Regional Plan integrates both the 2004 Regional Comprehensive Plan and the 2050 Regional Transportation Plan and Sustainable Communities Strategy (SCS) into one unified plan. By incorporating the SCS, the Regional Plan is in compliance with Senate Bill 375, which identifies how the region will address greenhouse gas emissions to meet State-mandated levels and focuses on land use planning and transportation issues in an attempt to develop sustainable growth patterns on a regional level.

California State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). The requirements within the state CMP were developed to monitor the performance of the transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. SANDAG provided regular updates for the state CMP from 1991 through 2008. In October 2009, the San Diego region elected to be exempt from the state CMP, and, since this decision, SANDAG has been abiding by 23 Code of Federal Regulations (CFR) 450.320 to ensure the region's continued compliance with the federal congestion management process. The Regional Plan is the region's long-range transportation plan and SCS, and meets the requirements of 23 CFR 450.320 by incorporating the following federal congestion management process: performance monitoring and measurement of the regional transportation system, multimodal alternatives and non-single occupant vehicle analysis, land use impact analysis, the provision of congestion management tools, and integration with the regional transportation improvement program process.

Riding to 2050, the San Diego Regional Bike Plan

The San Diego Regional Bike Plan (SANDAG 2010) was developed to support the 2004 Regional Comprehensive Plan and the 2050 Regional Transportation Plan in implementing the regional strategy for utilizing the bicycle as a valid form of everyday travel. The bike plan, as a part of the SCS mandated by Senate Bill 375, provides for a detailed Regional Bike Network, as well as the programs that are necessary to support it. Implementation of the Regional Bike Plan would help the region meet goals for reducing greenhouse gas emissions and improving mobility.

City of San Diego Traffic Impact Study Manual

The City's *Traffic Impact Study Manual*, approved in 1998, was created to establish a procedure for determining the type of traffic impact study necessary and to address and establish certain requirements for preparing traffic impact analyses. The manual provides guidance on establishing a

study area, deciding how extensive a traffic study should be, setting project phasing, using background information, and adjusting or compensating for transit stations or mixed-use developments. The manual also provides City thresholds for acceptable roadway and intersection operations and further guidance on the City's internal review process, to aid in traffic study preparation.

City of San Diego Street Design Manual

The City's *Street Design Manual* (City of San Diego 2002) provides information and guidance for the design of public right-of-way that accommodates a variety of potential users, including motorists, pedestrians, and bicyclists. The *Street Design Manual* is divided into six sections: Roadway Design, Pedestrian Design, Traffic Calming, Street Lighting, Parkway Configurations, and Design Standards. The guidelines are focused on the development of new or undeveloped areas as well as redeveloping areas and are not intended to supersede other guidelines developed in other local planning documents, such as community plans, specific plans, and regional transportation plans.

City of San Diego Bicycle Master Plan

The City of San Diego Bicycle Master Plan (2013) provides a framework for making cycling a more practical and convenient transportation option for San Diegans at different riding purposes and skill levels. The Bicycle Master Plan is a 20-year policy document that guides the development and maintenance of San Diego's bicycle network. The bicycle network includes all roadways that bicyclists have the legal right to use, support facilities, and non-infrastructure programs. The plan includes direction for policymakers on expanding the existing bikeway network, connecting gaps, addressing constrained areas, improving intersections, providing for greater local and regional connectivity, and encouraging more residents to bicycle more often. The 2013 update builds on the 2002 version by updating bicycling needs by addressing changes to the bicycle network and overall infrastructure.

City of San Diego Pedestrian Master Plan

The Pedestrian Master Plan (City of San Diego 2006) provides guidelines to the City that will enhance neighborhood quality and mobility options through the facilitation of pedestrian improvement projects. The Pedestrian Master Plan both identifies and prioritizes pedestrian improvement projects through technical analysis and community input programs, which are typically grant-funded.

City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is to improve mobility through development of a balanced, multimodal transportation network. The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems, Transportation Demand Management, bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

Mission Valley Community Plan

The Transportation Element of the Mission Valley Community Plan (1985) discusses numerous aspects of the circulation system within the community. The primary objective of the element is to facilitate transportation into, throughout, and out of Mission Valley while seeking to establish and maintain a balanced transportation system. Relevant to the project, the plan discusses gaps in the surface street system. It specifically states (page 76):

Some roadways north of Friars Road will need to be developed as part of the Mission Valley transportation system. These roads will be located in those areas between SR-163 and I-15, which are currently involved in sand and gravel extraction. The roads will be implemented at the time of each individual area's proposed change of land use from sand and gravel extraction to urban development, once resource depletion has occurred.

Serra Mesa Community Plan

The Transportation Element within the Serra Mesa Community Plan states that the transportation system should be well balanced between individual and mass transit conveyances and offer a wide choice among modes of travel. The plan does not specifically mention the proposed roadway connection. The policies within the plan state that: street widening and other improvements should be minimized and compatibility with the total landscape should be ensured; curb cuts along designated primary arterial and major streets should be discouraged; hillside and canyon views should be preserved when new streets are constructed; and unsightly barricades at the ends of minor residential streets should be replaced with cul-de-sacs and loop streets.

5.2.3 Significance Determination Thresholds

5.2.3.1 Issue Questions

The following issue questions are based on the City's Significance Determination Thresholds (2016) and provide the basis for determining significance of impacts on existing transportation and circulation conditions as a result of the proposed project's implementation.²

Impacts are considered significant if the project would result in any of the following.

1. An increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system.
2. The addition of a substantial amount of traffic to a congested freeway interchange or ramp, or in a substantial increase in VMT for freeway mainline segments.
3. A substantial impact upon existing or planned transportation systems.
4. An increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway).

² On September 2016, Caltrans adopted Interim Guidance for assessing freeway mainline segments, which would replace LOS and other delay metrics with VMT to determine whether a project would result in an impact under CEQA. Therefore, the freeway mainline segment analysis uses VMT rather than LOS to determine if impacts on any freeway mainline segments would occur.

5. Substantial alterations to present circulation movements, including effects on existing public access to beaches, parks, or other open space areas.
6. Conflicts with adopted policies, plans, or programs supporting alternative transportation modes.

5.2.3.2 Methods and Assumptions

Direct traffic impacts are those projected to occur at the time a proposed development becomes operational, including other developments not presently operational but anticipated to be operational at that time (near-term). Additionally, 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 the affected community plan area reaches full planned buildout (long-term cumulative). Because the proposed project involves an amendment to the Serra Mesa Community Plan, the cumulative impact analysis evaluates the long-term cumulative impacts projected to occur when the Serra Mesa Community Plan reaches full planned buildout, which is anticipated to occur by the year 2035. Accordingly, the cumulative impact analysis under Issue 3 applies the projected traffic conditions for the year 2035. Potential direct and long-term cumulative impacts related to each of these thresholds are discussed in the impact analysis that follows, as appropriate.

The Near-Term Scenario (Year 2017) does not assume that the SR-163/Friars Road interchange or Hazard Center Road extension would be constructed, but other regional improvements beyond the study area are included in SANDAG's model.

The significance of impacts for each study scenario were determined based on the peak-hour intersection analysis, daily roadway segment analysis, and ramp meter analysis, utilizing the quantitative thresholds identified in the City's Significance Determination Thresholds (2016). These thresholds are generally based upon an acceptable increase in the V/C ratio for roadway segments, and upon increases in vehicle delays for intersections and ramps. As previously detailed, based on the Interim Guidance issued by Caltrans, the freeway mainline segment analysis uses VMT rather than LOS to determine if impacts on any freeway mainline segments would occur. A significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition.

In the City of San Diego, LOS D is considered acceptable for roadway and intersection operations. A project is considered to have a significant impact if it degrades the operations of a roadway or intersection from an acceptable LOS (D or better) to an unacceptable LOS (E or F), or if it adds additional delay to a facility already operating at an unacceptable level.

The City's Significance Determination Thresholds (2016) identifies significant impacts if one of the criteria provided in Table 5.2-9 are met. Table 5.2-9 summarizes the City's thresholds for project traffic impacts.

Table 5.2-9. City of San Diego Traffic Impact Significance Thresholds

LOS with Project	Allowable Change Due to Project Impact			
	Roadway Segments	Intersections	Ramp Metering	
	V/C	Speed (mph)	Delay (seconds)	Delay (minutes)
E (or ramp meter delays above 15 minutes)	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 minutes)	0.01	0.5	1.0	1.0

5.2.4 Impact Analysis

Issues 1 and 2: Roadway Capacity

Would the project result in (1) an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system or (2) the addition of a substantial amount of traffic to a congested freeway interchange or ramp; for mainline freeway segments, result in a substantial increase in VMT over existing conditions?

5.2.4.1 Impact Discussion

The Near-Term scenario compares the Year 2017 roadway, intersection, and freeway facility conditions with the addition of the proposed project. Potential significant direct impacts on roadway facilities are analyzed in terms of changes in V/C ratio, average delay, and LOS in accordance with the City's thresholds outlined in Table 5.2-9 above and VMT for Caltrans' freeway facilities, in accordance with recent guidance published by Caltrans.

Roadway Segments

Table 5.2-10 compares the performance of study area roadway segments under Near-Term conditions with and without the project and displays the changes in V/C ratio and LOS, which are the basis for identification of significant direct impacts on roadway segments associated with the proposed project.

As shown in Table 5.2-10, the proposed project would have a significant direct impact on the following four study area roadway segments.

- Murray Ridge Road, from Mission Center road to Pinecrest Avenue (**Impact TRAF-1**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-2**)
- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-3**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-4**)

Table 5.2-10. Roadway Segments: Near-Term Baseline Condition vs Near-Term Project Condition

Roadway Segment	Lanes/ Classification	LOS E Capacity	Near-Term Baseline			Near-Term with Project			Comparison	
			ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	SI?
Civita Blvd										
Mission Center Rd to Via Alta	4M	40,000	8819	0.220	A	5,227	0.131	A	-0.089	No
Via Alta to Russell Pkwy	4M	40,000	1,7349	0.434	B	11,403	0.285	A	-0.149	No
Russell Pkwy to Qualcomm Wy	4M	40,000	16,705	0.418	B	11,810	0.295	A	-0.123	No
Qualcomm Wy to Franklin Ridge Rd	4M	40,000	7697	0.192	A	9,897	0.247	A	0.055	No
Franklin Ridge Rd										
Via Alta to Civita Blvd	2M	16,667	6,912	0.415	B	12,620	0.757	C	0.342	No
Phyllis Pl to Via Alta	4M	40,000	-	-	-	23,217	0.580	C	0.580	No
Friars Rd										
Mission Center Rd to Qualcomm Wy	6E	80,000	4,7944	0.599	C	40,418	0.505	B	-0.094	No
Qualcomm Wy to Fenton Pkwy	6E	80,000	37,732	0.472	B	39,466	0.493	B	0.021	No
Fenton Pkwy to Northside Dr	6P	60,000	35,586	0.593	C	36,800	0.613	C	0.020	No
Mission Center Rd										
Hazard Center Dr to Friars Rd	4M	40,000	26,753	0.669	C	25,908	0.648	C	-0.021	No
Friars Rd to Mission Center Drwy (Creekside Park Ln)	5M	45,000	23,386	0.520	B	19,596	0.435	B	-0.085	No
Mission Center Drwy (Creekside Park Ln) to Mission Valley Rd	5M	45,000	16,422	0.365	A	13,552	0.301	A	-0.064	No
Mission Valley Rd to Aquatera Drwy	4M	40,000	18,158	0.454	B	8,137	0.203	A	-0.251	No
Aquatera Drwy to Murray Ridge Rd	2C NF	10,000	18,158	1.816	F	8,137	0.814	D	-1.002	No
Murray Ridge Rd										
I-805 NB ramp to Mission Center Rd	2C CL	15,000	23,814	1.588	F	18,165	1.211	F	-0.377	No
Mission Center Rd to Pinecrest Ave	2C CL	15,000	16,904	1.127	F	18,111	1.207	F	0.080	Yes
Pinecrest Ave to Sandrock Rd	2C CL	15,000	12,601	0.840	D	13,476	0.898	E	0.058	Yes
Phyllis Pl										
Abbotshill Rd to Franklin Ridge Rd	2C NF	10,000	2,420	0.242	A	2,420	0.242	A	0.000	No

Roadway Segment	Lanes/ Classification	LOS E Capacity	Near-Term Baseline			Near-Term with Project			Comparison	
			ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	SI?
Franklin Ridge Rd to I-805 SB ramp	2C NF	10,000	2,420	0.242	A	23,355	2.336	F	2.0935	Yes
I-805 SB ramp to I-805 NB ramp	2C CL	15,000	10,785	0.719	D	17,599	1.173	F	0.454	Yes
Qualcomm Wy										
Civita Blvd to Friars Rd WB ramp	6M	50,000	18,097	0.362	A	19,405	0.388	A	0.026	No
Friars Rd WB ramp to Friars Rd EB ramp	6M	50,000	16,999	0.340	A	19,005	0.380	A	0.040	No
Friars Rd EB ramp to Rio San Diego Dr	6M	50,000	20,560	0.411	B	23,414	0.468	B	0.057	No
Rio San Diego Dr										
Qualcomm Wy to Rio Bonito Wy	4C	30,000	20,917	0.697	D	21,940	0.731	D	0.034	No
Russell Pkwy										
Civita Blvd to Friars Rd	2M	16,667	10,300	0.618	C	9,600	0.576	C	-0.042	No
Sandrock Rd										
Murray Ridge Rd to Aero Dr	2C CL	15,000	10,507	0.700	D	11,366	0.758	D	0.058	No
Westside Dr										
Mission Center Rd to Via Alta	2C CL	15,000	7,174	0.478	C	8,744	0.583	C	0.105	No
Via Alta										
Franklin Ridge Rd to Civita Blvd	2M	16,667	2,957	0.177	A	9,476	0.569	C	0.392	No
Civita Blvd to Westside Dr	2M	16,667	3,435	0.206	A	5,005	0.300	A	0.094	No

Source: Appendix C

Bold letter indicates substandard LOS E or F.

2C CL = 2-lane Collector with a continuous left-turn lane

2C NF = 2-lane collector with no fronting property

4C = 4-lane Collector

4M = 4-lane Major Street

5M = 5-lane Major Street

6E = 6-lane Expressway

6M = 6-lane Major

6P = 6-lane Prime Arterial

SI? = Significant Impact

Intersections

Table 5.2-11 compares the performance of study area intersections under the Near-Term Scenario with and without the project and displays the change in average delay and LOS, which are the basis for identification of significant direct impacts on intersections associated with the proposed project.

As shown in Table 5.2-11, the proposed project would cause a significant direct impact on the following three study area intersections.

- Murray Ridge Road and I-805 NB ramps (PM peak hour) (**Impact TRAF-5**)
- Murray Ridge Road and I-805 SB ramps (PM peak hour) (**Impact TRAF-6**)
- Qualcomm Way and Friars Road WB ramps (PM peak hour) (**Impact TRAF-7**)

Table 5.2-11. Intersections: Near-Term Baseline Condition vs Near-Term Project Condition

Intersection	Traffic Control	Peak Hour	Near-Term Baseline		Near-Term with Project		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	SI?
1. Friars Rd & River Run Rd	Signal	AM	11.1	B	10.6	B	-0.5	No
		PM	18.7	B	17.4	B	-1.3	No
2. Friars Rd & Fenton Pkwy	Signal	AM	20.6	C	20.4	C	-0.2	No
		PM	30.3	C	31.1	C	0.8	No
3. Friars Rd & Northside Dr	Signal	AM	17.4	B	17.4	B	0.0	No
		PM	64.7	E	64.7	E	0.0	No
4. Mission Center Rd & Murray Ridge Rd/Phyllis Pl	Signal	AM	41.5	D	30.2	C	-11.3	No
		PM	53.5	D	47.8	D	-5.7	No
5. Mission Center Rd & Aquatera Drwy	Signal	AM	17.4	B	18.5	B	1.1	No
		PM	16.5	B	17.2	B	0.7	No
6. Mission Center Rd & Mission Valley Rd (Civita Blvd)	Signal	AM	21.5	C	20.3	C	-1.2	No
		PM	25.4	C	24.8	C	-0.6	No
7. Mission Center Rd & Westside Dr (Mission Center Drwy)	Signal	AM	16.8	B	17.5	B	0.7	No
		PM	15.1	B	15.9	B	0.8	No
8. Mission Center Rd & Friars Rd/EB ramps	Signal	AM	11.0	B	10.7	B	-0.3	No
		PM	15.2	B	13.2	B	-2.0	No
9. Mission Center Rd & Friars Rd/WB ramps	Signal	AM	10.0	A	9.4	A	-0.6	No
		PM	15.2	B	13.8	B	-1.4	No
10. Mission Center Rd & Mission Center Ct	Signal	AM	15.0	B	15.0	B	0.0	No
		PM	25.9	C	26.0	C	0.1	No
11. Aero Dr & Sandrock Rd	Signal	AM	10.6	B	10.6	B	0.0	No
		PM	13.1	B	14.6	B	1.5	No
12. Murray Ridge Rd and Sandrock Rd	Signal	AM	17.6	B	18.0	B	0.4	No
		PM	32.7	C	38.9	D	6.2	No

Intersection	Traffic Control	Peak Hour	Near-Term Baseline		Near-Term with Project		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	SI?
13. Murray Ridge Rd and Pinecrest Ave	Signal	AM	15.5	B	15.2	B	-0.3	No
		PM	16.7	B	16.5	B	-0.2	No
14. Murray Ridge Rd & I-805 NB ramp	Signal	AM	9.9	A	24.0	C	14.1	No
		PM	11.0	B	59.4	E	48.4	Yes
15. Murray Ridge Rd & I-805 SB ramp	Signal	AM	14.0	B	34.8	C	20.8	No
		PM	21.8	C	141.4	F	119.6	Yes
16. Qualcomm Wy & Friars Rd EB ramp	Signal	AM	15.8	B	14.3	B	-1.5	No
		PM	18.5	B	18.1	B	-0.4	No
17. Qualcomm Wy & Friars Rd WB ramp	Signal	AM	25.0	C	26.1	C	1.1	No
		PM	53.9	D	58.2	E	4.3	Yes
18. Qualcomm Wy & Rio San Diego Dr	Signal	AM	12.8	B	13.5	B	0.7	No
		PM	25.4	C	29.5	C	4.1	No
19. Rio San Diego Dr & Rio Bonito Wy	Signal	AM	14.5	B	14.5	B	0.0	No
		PM	14.9	B	15.6	B	0.7	No
20. Phyllis Pl & Franklin Ridge Rd	Signal	AM	0.0	0	10.9	B	10.9	No
		PM	0.0	0	10.4	B	10.4	No
21. Via Alta & Franklin Ridge Rd	Signal	AM	25.9	C	29.8	C	3.9	No
		PM	22.2	C	28.1	C	5.9	No
22. Via Alta & Civita Blvd	Signal	AM	14.2	B	18.1	B	3.9	No
		PM	16.5	B	19.8	B	3.3	No
23. Civita Blvd & Russell Pkwy/Gill Village Dr	Signal	AM	17.4	B	12.0	B	-5.4	No
		PM	19.5	B	18.9	B	-0.6	No
24. Qualcomm Wy & Civita Blvd	Signal	AM	15.5	B	16.3	B	0.8	No
		PM	15.3	B	16.0	B	0.7	No

Source: Appendix C

Bold letter indicates substandard LOS E or F.

SI? = Significant Impact

Freeway Ramp Meters

Table 5.2-12 compares the study area ramp meter performance under the Near-Term scenario and displays the change in queue length and delay, which are the basis for identification of significant direct impacts on metered freeway ramps associated with the proposed project. As shown in Table 5.2-12, all metered on-ramps within the project study area are projected to operate with fewer than 15 minutes of delay. Based on the criteria outlined in Table 5.2-9, impacts associated with metered freeway on-ramps would be less than significant.

Table 5.2-12. Ramp Metering: Near-Term Baseline Condition vs Near-Term Project Condition

Location	Meter Rate	Near-Term Baseline				Near-Term With Project				Comparison	
		Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Δ Delay (min)	SI?
AM Peak Hour											
Murray Ridge Rd – I-805 NB on-ramp	851	368	0	0	0	838	0	0	0	0	No
PM Peak Hour											
Murray Ridge Rd – I-805 SB on-ramp	691	542	0	0	0	798	107	9	3,112	9	No
Murray Ridge Rd – I-805 SB on-ramp (HOV)	691	60	0	0	0	89	0	0	0	0	No
Source: Appendix C SI? = Significant Impact											

Freeway Mainline

For informational purposes, Table 5.2-13 compares the performance of key study area freeway mainline segments under Near-Term 2017 baseline conditions followed by the Near-term plus project conditions and shows the changes in V/C ratio and LOS. As shown in Table 5.2-13, if the LOS criteria were to be utilized, the project would result in a significant impact at six freeway segments as the increase in V/C ratio would exceed the City's significance criteria (see Table 5.2-9).

Table 5.2-13. Freeway Mainline Segments: Near-Term Baseline Condition vs Near-Term Project Condition

Freeway Segment	AM/PM	LOS E Capacity	2017 without Project			2017 with Project		
			PHV	V/C	LOS	PHV	V/C	LOS
I-805 Northbound								
I-8 to Murray Ridge Rd	AM	11,200	15,859	1.416	F	15,877	1.418	F
	PM	13,000	8,003	0.715	C	8,013	0.715	C
Murray Ridge Rd to Mesa College Dr	AM	11,200	15,854	1.416	F	16,188	1.445	F
	PM	11,200	8,001	0.714	C	8,169	0.729	C
Mesa College Dr to SR-163	AM	11,200	14,339	1.28	F	14,630	1.306	F
	PM	11,200	7,236	0.646	C	7,383	0.659	C
I-805 Southbound								
SR-163 to Mesa College Dr	AM	11,200	6,222	0.556	B	6,348	0.567	B
	PM	11,200	14,217	1.269	F	14,506	1.295	F
Mesa College Dr to Murray Ridge Rd	AM	11,200	6,879	0.614	B	7,024	0.627	C
	PM	11,200	15,720	1.404	F	16,051	1.433	F
Murray Ridge Rd to I-8	AM	11,200	6,881	0.529	B	6,889	0.53	B
	PM	13,000	15,724	1.210	F	15,743	1.211	F
Source: Appendix C Bold letter indicates substandard LOS E or F.								

As noted in Section 5.2.1.2, Caltrans' Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing VMT on the regional circulation network. The proposed project would not add trips to the regional circulation network; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition.

As detailed in Appendix H to this EIR, the VMT for the study area without the project under the Near-Term scenario (Year 2017) is 531,382. The region-wide total (i.e., San Diego region) without the project under this scenario is 1,523,630.

An analysis of the regional VMT was conducted with the implementation of the proposed roadway connection. The modeled VMT with the roadway connection under the Near-Term Scenario (Year 2017) within the study area is 521,826. This represents a 1.8 percent decrease of VMT within the study area. With the proposed project, the region-wide VMT total is 1,518,696, a decrease of 0.32 percent.

Therefore, as the proposed project would reduce VMT, impacts associated with freeway mainline segments would be less than significant.

5.2.4.2 Significance of Impacts

Based on the City's significance thresholds outlined in Table 5.2-9, the proposed project would result in significant direct impacts on four roadway segments and three intersections in the Near-Term scenario. Therefore, mitigation would be required to reduce potential impacts to the maximum extent feasible.

Roadway Segments

- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-1**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-2**)
- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-3**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-4**)

Intersections

- Murray Ridge Road and I-805 NB ramps (**Impact TRAF-5**)
- Murray Ridge Road and I-805 SB ramps (**Impact TRAF-6**)
- Qualcomm Way and Friars Road WB (**Impact TRAF-7**)

5.2.4.3 Mitigation Measures

The following section summarizes the direct impacts identified for the Near-Term scenario in the previous sections under each of the impact assessment analyses and provides mitigation measures for these identified impacts.

Roadway Segments

1. **Impact TRAF-1:** Murray Ridge Road, from Mission Center Road to Pinecrest Avenue

MM-TRAF-1: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Mission Center Road to Pinecrest Avenue to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause

a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

2. **Impact TRAF-2:** Murray Ridge Road, from Pinecrest Avenue to Sandrock Road

MM-TRAF-2: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Pinecrest Avenue to Sandrock Road to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

3. **Impact TRAF-3:** Phyllis Place, from Franklin Ridge Road to I-805 SB ramps

MM-TRAF-3: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be widened from Franklin Ridge Road to I-805 SB ramps to accommodate five total lanes (three EB and two WB), including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.

4. **Impact TRAF-4:** Phyllis Place, from I-805 SB ramps to I-805 NB ramps

MM-TRAF-4: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. ~~The new classification for this segment of Phyllis Place will be a four-lane Collector.~~

Intersections

5. **Impact TRAF-5:** Murray Ridge Road/I-805 NB ramps

MM-TRAF-5: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, in coordination with Caltrans, the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.

6. **Impact TRAF-6:** Murray Ridge Road/I-805 SB ramps

MM-TRAF-6: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be

widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.

7. **Impact TRAF-7:** Qualcomm Way/Friars Road WB ramps

MM-TRAF-7: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the Qualcomm Way and Friars Road WB ramps intersection shall be reconfigured with the following improvements: the SB approach shall be widened to accommodate two through lanes and one exclusive right-turn lane; the NB approach shall be restriped to accommodate two through lanes and two left-turn lanes; and the WB on-ramp shall be widened to accommodate two receiving lanes.

5.2.4.4 Significance after Mitigation

Roadway Segments

As shown in Table 5.2-15, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments. However, this analysis assumes that the mitigation measures would not be implemented (for the reasons detailed in Section 5.2.4.3) at the following segments:

- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-1**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-2**)

Therefore, impacts at these segments under the Near-Term scenario would be significant and unavoidable. Mitigation measures **MM-TRAF-1** and **MM-TRAF-2**, which require restriping of two impacted roadway segments along Murray Ridge Road (**Impact TRAF-1** and **Impact TRAF-2**), would result in less-than-significant secondary effects. The generation of any criteria pollutant and GHG emissions during restriping of the impacted roadway segments would be temporary and minor. Furthermore, the new lanes that would be added along the impacted roadway segments as a result of the restriping would not generate any new vehicle trips, but would merely accommodate the additional traffic that would be redistributed onto these roadway segments as a result of the proposed project. Therefore, secondary impacts associated with the implementation of **MM-TRAF-1** and **MM-TRAF-2** would be less than significant.

Table 5.2-14 shows the post-mitigation measure LOS where mitigation will be implemented.

As shown, mitigation would improve LOS at the following impacted segments to an acceptable level.

- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-3**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-4**)

Therefore, impacts at these segments under the Near-Term scenario would be less than significant after mitigation. Mitigation measure **MM-TRAF-3** requires widening the roadway segment of Phyllis Place from Franklin Ridge Road to the I-805 SB ramps (**Impact TRAF-3**), which itself could result in potential secondary impacts. As further discussed in Section 5.5, *Biological Resources*, disturbed habitat is located primarily south along Phyllis Place and dominated by sweet clover, mustards, stork's bill, and brome grasses. Disturbed habitat is not considered sensitive under the City's Multiple Species Conservation Program (MSCP) Subarea Plan. It is not anticipated that additional

right-of-way would be acquired to implement **MM-TRAF-3**. However, if additional space was required, **MM-TRAF-3** would not result in any impacts on sensitive habitat, and the loss of disturbed habitat would be considered a less-than-significant impact. Accordingly, implementation of **MM-TRAF-3** would result in less-than-significant secondary impacts. Regarding mitigation measure **MM-TRAF-4**, which requires restriping from the I-805 SB ramps to the I-805 NB ramps along Phyllis Place, the generation of any criteria pollutant and GHG emissions during restriping of the impacted roadway segments would be temporary and minor. Furthermore, the new lanes that would be added along the impacted roadway segment as a result of the restriping would not generate any new vehicle trips, but would merely accommodate the additional traffic that would be redistributed onto these roadway segments as a result of the proposed project. Therefore, secondary impacts associated with the implementation of **MM-TRAF-4** would be less than significant.

Intersections

Table 5.2-15 shows the post-mitigation measure LOS for impacted intersections. As shown in Table 5.2-15, mitigation would improve LOS at the following intersections to an acceptable level:

- Murray Ridge Road/I-805 NB ramps (**Impact TRAF-5**)
- Murray Ridge Road/I-805 SB ramps (**Impact TRAF-6**)
- Qualcomm Way/Friars Road WB ramp (**Impact TRAF-7**)

Therefore, intersection impacts under the Near-Term scenario would be less than significant after mitigation. Mitigation measures **MM-TRAF-5** and **MM-TRAF-6** require the widening of the I-805 SB ramps and I-805 NB ramps, respectively, at Murray Ridge Road. While the widening itself could result in potential secondary impacts, both on-ramps have shoulders that are several feet wide on each side. A reduction of the shoulder would have no significant impact on the environment. Moreover, if additional space was required, there are areas along the shoulder that are heavily disturbed. A loss of a small amount of heavily disturbed ruderal vegetation would be a less-than-significant impact. Accordingly, implementation of **MM-TRAF-5** and **MM-TRAF-6** would result in less-than-significant secondary impacts. Similarly, mitigation measure **MM-TRAF-7**, which requires widening of the SB approach on Qualcomm Way and the Friars Road WB on-ramp, would also result in less-than-significant secondary effects.

Table 5.2-14. Roadway Segments: Near-Term Baseline Plus Project Condition (Unmitigated vs. Mitigated)

Location	2017 with Project			2017 with Project with Mitigation				Comparison	
	ADT	V/C	LOS	Mitigated Classification	LOS E Capacity	V/C	LOS	V/C	MI?
Murray Ridge Rd									
Mission Center Rd to Pinecrest Ave	18,111	1.207	F	4C	30,000	0.604	C	-0.603	Yes*
Pinecrest Ave to Sandrock Rd	13,476	0.898	E	4C	30,000	0.449	B	-0.449	Yes*
Phyllis Pl									
Franklin Ridge Rd to I-805 SB ramp	23,355	2.336	F	5M	45,000	0.519	B	-1.817	Yes
I-805 SB ramp to I-805 NB ramp	17,599	1.173	F	4C	30,000	0.587	C	-0.586	Yes

Source: Appendix C

Bold letter indicates substandard LOS E or F.

MI? = Mitigated Below Significant?

* Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume this mitigation will occur. In the event it does not, the impact would remain significant and unavoidable.

Table 5.2-15. Intersections: Near-Term Baseline Plus Project Condition (Unmitigated vs. Mitigated)

Location	Traffic Control	Peak Hour	2017 with Project		2017 with Project with Mitigation		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	MI?
Murray Ridge Rd & I-805 NB ramp	Signal	AM	24.0	C	16.5	B	-7.5	Yes
		PM	59.4	E	30.4	C	-29.0	Yes
Murray Ridge Rd & I-805 SB ramp	Signal	AM	34.8	C	13.4	B	-21.4	Yes
		PM	141.4	F	27.0	C	-114.4	Yes
Qualcomm Wy & Friars Rd WB ramp	Signal	AM	26.1	C	24.2	C	-1.9	Yes
		PM	58.2	E	32.4	C	-25.8	Yes

Source: Appendix C

Bold letter indicates substandard LOS E or F.

MI? = Mitigated Below Significant?

5.2.5 Impact Analysis

Issue 3: Planned Transportation Systems

Would the proposed project result in a substantial impact upon existing or planned transportation systems?

5.2.5.1 Impact Discussion

The project's potential impact on near-term conditions is addressed under Section 5.2.4. Therefore, this analysis focuses on the Long-Term (Year 2035) traffic scenario and evaluates the proposed project's potential contribution to cumulative impacts on the planned transportation system by comparing the Year 2035 study area roadway, intersection, and freeway facility conditions without the project (Serra Mesa Community Plan buildout) to the forecasted condition with the project.

Roadway Segments

As previously shown in Table 5.2-9, a project is considered to have a significant impact if it degrades the operations from an acceptable LOS (D or better) to an unacceptable LOS (E or F), or if it adds additional delay to a facility already operating at an unacceptable level. Table 5.2-16 compares the performance of study area roadway segments under the Long-Term scenario with and without the project and displays the changes in V/C ratio and LOS, which are the basis for identification of significant cumulative impacts on roadway segments associated with the proposed project.

As shown in Table 5.2-16, the proposed project would have a significant long-term cumulative impact on the following six roadway segments.

- Franklin Ridge Road, from Via Alta to Civita Boulevard (**Impact TRAF-8**)
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-9**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact C-TRAF-10**)
- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-11**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-12**)
- Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (**Impact TRAF-13**)

Table 5.2-16. Roadway Segments: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project

Roadway Segment	Lanes/ Class	LOS E Capacity	2035 without Project			2035 with Project			Comparison	
			ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	SI?
Civita Blvd										
Mission Center Rd to Via Alta	4M	40,000	19,181	0.480	B	11,368	0.284	A	-0.196	No
Via Alta to Russell Pkwy	4M	40,000	17,523	0.438	B	12,672	0.317	A	-0.121	No
Russell Pkwy to Qualcomm Wy	4M	40,000	24,859	0.621	C	20,008	0.5	B	-0.121	No
Qualcomm Wy to Franklin Ridge Rd	4M	40,000	11,913	0.298	A	21,375	0.534	C	0.236	No
Franklin Ridge Rd										
Via Alta to Civita Blvd	2M	16,667	10,457	0.627	C	20,919	1.255	F	0.628	Yes
Phyllis Pl to Via Alta	4M	40,000	0	0.000	0	34,117	0.853	D	0.853	No
Friars Rd										
Mission Center Rd to Qualcomm Wy	6E	80,000	50,157	0.627	C	44,022	0.55	C	-0.077	No
Qualcomm Wy to Fenton Pkwy	6E	80,000	46,207	0.578	C	48,331	0.604	C	0.026	No
Fenton Pkwy to Northside Dr	6P	60,000	42,555	0.709	C	44,303	0.738	C	0.029	No
Mission Center Rd										
Hazard Center Dr to Friars Rd	4M	40,000	33,908	0.848	D	32,591	0.815	D	-0.033	No
Friars Road to Mission Center Drwy (Creekside Park Ln)	5M	45,000	34,552	0.768	C	29,393	0.653	C	-0.115	No
Mission Center Drwy (Creekside Park Ln) to Mission Valley Rd	5M	45,000	24,087	0.535	B	18,936	0.421	B	-0.114	No
Mission Valley Rd to Aquatera Drwy	4M	40,000	23,850	0.596	C	13,064	0.327	A	-0.269	No
Aquatera Drwy to Murray Ridge Rd	2C NF	10,000	23,850	2.385	F	13,064	1.306	F	-1.079	No
Murray Ridge Rd										
I-805 NB ramp to Mission Center Rd	2C CL	15,000	31,178	2.079	F	23,070	1.538	F	-0.541	No
Mission Center Rd to Pinecrest Ave	2C CL	15,000	23,150	1.543	F	24,345	1.623	F	0.080	Yes
Pinecrest Ave to Sandrock Rd	2C CL	15,000	17,554	1.170	F	18,345	1.223	F	0.053	Yes
Phyllis Pl										
Abbotshill Rd to Franklin Ridge Rd	2C NF	10,000	2,420	0.242	A	2,420	0.242	A	0.000	No
Franklin Ridge Rd to I-805 SB ramp	2C NF	10,000	2,420	0.242	A	34,540	3.454	F	3.212	Yes

Roadway Segment	Lanes/ Class	LOS E Capacity	2035 without Project			2035 with Project			Comparison	
			ADT	V/C	LOS	ADT	V/C	LOS	Δ V/C	SI?
I-805 SB ramp to I-805 NB ramp	2C CL	15,000	14,570	0.971	E	24,037	1.602	F	0.631	Yes
Qualcomm Wy										
Civita Blvd to Friars Rd WB ramp	6M	50,000	27,003	0.540	B	28,955	0.579	C	0.039	No
Friars Rd WB ramp to Friars Rd EB ramp	6M	50,000	22,089	0.442	B	24,696	0.494	B	0.052	No
Friars Rd EB ramp to Rio San Diego Dr	6M	50,000	20,437	0.409	B	23,274	0.465	B	0.056	No
Rio San Diego Dr										
Qualcomm Wy to Rio Bonito Wy	4C	30,000	27,082	0.903	E	28,033	0.934	E	0.031	Yes
Russell Pkwy										
Civita Blvd to Friars Rd	2M	16,667	11,900	0.714	C	11,400	0.684	C	-0.030	No
Sandrock Rd										
Murray Ridge Rd to Aero Dr	2C CL	15,000	12,054	0.804	D	12,572	0.838	D	0.034	No
Westside Dr										
Mission Center Rd to Via Alta	2C CL	15,000	8,334	0.556	C	10,628	0.709	D	0.153	No
Via Alta										
Franklin Ridge Rd to Civita Blvd	2M	16,667	3,647	0.219	A	11,686	0.701	C	0.482	No
Civita Blvd to Westside Dr	2M	16,667	3,356	0.201	A	5,650	0.339	A	0.138	No

Source: Appendix C

Bold letter indicates substandard LOS E or F.

2C CL = 2-lane Collector with a continuous left-turn lane

2C NF = 2-lane collector with no fronting property

4C = 4-lane Collector

4M = 4-lane Major Street

5M = 5-lane Major Street

6E = 6-lane Expressway

6M = 6-lane Major

6P = 6-lane Prime Arterial

SI? = Significant Impact

Intersections

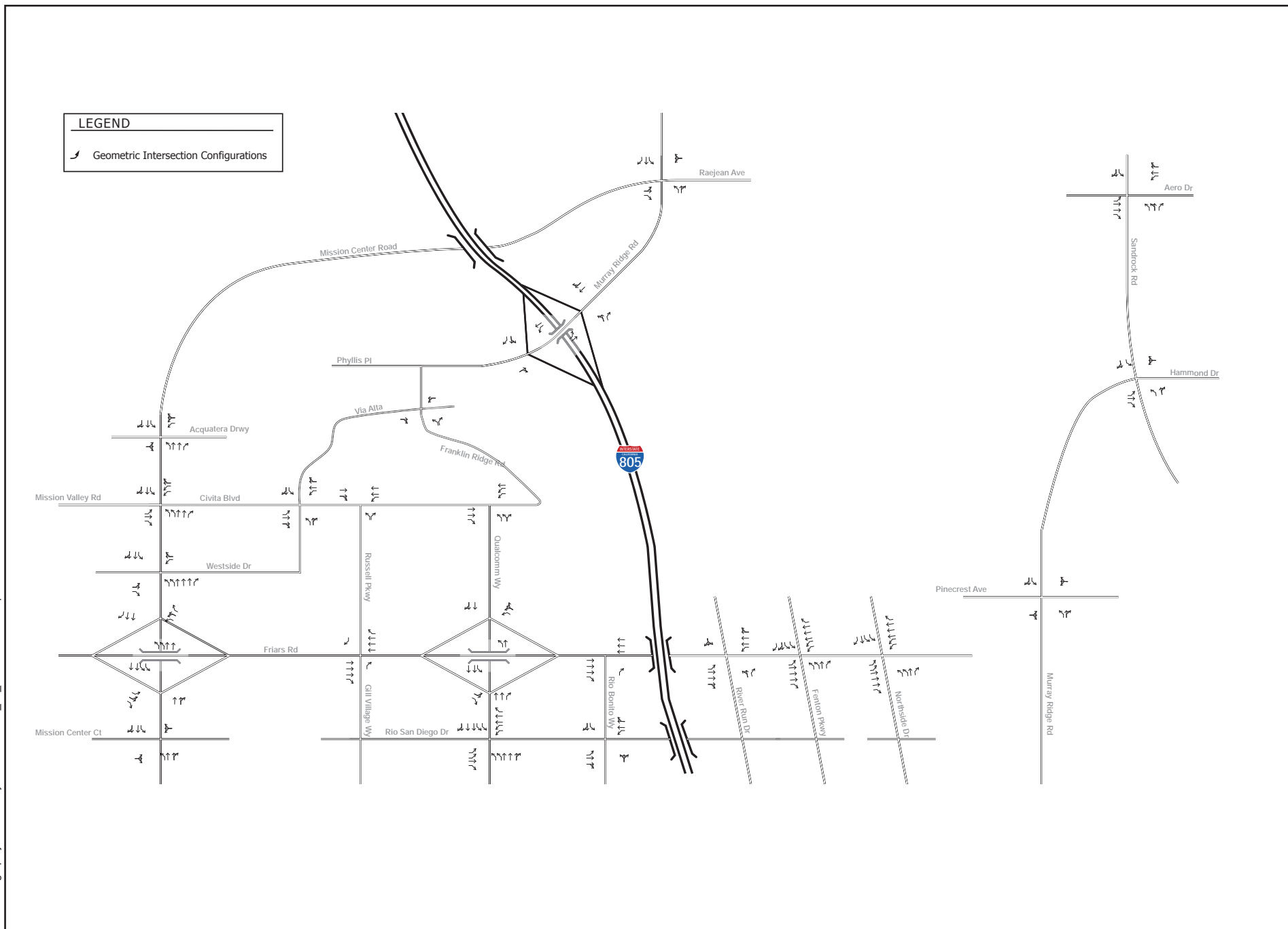
Figure 5.2-4 shows the intersection configurations for the Long-Term scenario. Table 5.2-17 compares the performance of study area intersections under Long-Term Year 2035 conditions with and without the project and displays the change in average delay and LOS, which are the basis for identification of significant long-term cumulative impacts on intersections associated with the proposed project.

As shown in Table 5.2-17, the proposed project would cause a significant long-term cumulative impact on the following four study area intersections.

- Murray Ridge Road and Sandroek Road (LOS E, PM peak hour) (**Impact TRAF-14**)
- Murray Ridge Road and I-805 NB ramps (LOS F, PM peak hour) (**Impact TRAF-15**)
- Murray Ridge Road and I-805 SB ramps (LOS E and F, AM and PM peak hour, respectively) (**Impact TRAF-16**)
- Via Alta and Franklin Ridge Road (PM peak hour) (**Impact TRAF-17**)

Table 5.2-17. Intersections: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project

Intersection	Traffic Control	Peak Hour	2035 w/o Project		2035 w/ Project		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	SI?
1. Friars Rd & River Run Rd	Signal	AM	13.0	B	13.6	B	0.6	No
		PM	20.1	C	22.6	C	2.5	No
2. Friars Rd & Fenton Pkwy	Signal	AM	21.5	C	21.9	C	0.4	No
		PM	32.5	C	33.7	C	1.2	No
3. Friars Rd & Northside Dr	Signal	AM	18.0	B	18.0	B	0.0	No
		PM	59.4	E	59.4	E	0.0	No
4. Mission Center Rd & Murray Ridge Rd/Phyllis Pl	Signal	AM	57.2	E	34.2	C	-23.0	No
		PM	171.4	F	42.3	D	-129.1	No
5. Mission Center Rd & Aquatera Drwy	Signal	AM	15.8	B	17.0	B	1.2	No
		PM	15.0	B	15.4	B	0.4	No
6. Mission Center Rd & Mission Valley Rd (Civita Blvd)	Signal	AM	27.2	C	23.2	C	-4.0	No
		PM	54.8	D	28.1	C	-26.7	No
7. Mission Center Rd & Westside Dr (Mission Center Drwy)	Signal	AM	16.2	B	17.9	B	1.7	No
		PM	25.9	C	20.5	C	-5.4	No
8. Mission Center Rd & Friars Rd/EB ramps	Signal	AM	13.8	B	11.9	B	-1.9	No
		PM	22.1	C	18.9	B	-3.2	No
9. Mission Center Rd & Friars Rd/WB ramps	Signal	AM	12.8	B	10.6	B	-2.2	No
		PM	30.4	C	23.2	C	-7.2	No
10. Mission Center Rd & Mission Center Ct	Signal	AM	20.6	C	20.4	C	-0.2	No
		PM	46.3	D	45.9	D	-0.4	No



Source: KOA Corporation, 2015.

Figure 5.2-4
Long-Term Scenario (2035) Intersection Configurations

Intersection	Traffic Control	Peak Hour	2035 w/o Project		2035 w/ Project		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	SI?
11. Aero Dr & Sandrock Rd	Signal	AM	12.6	B	12.6	B	0.0	No
		PM	27.7	C	31.9	C	4.2	No
12. Murray Ridge Rd and Sandrock Rd	Signal	AM	19.2	B	19.7	B	0.5	No
		PM	48.7	D	58.4	E	9.7	Yes
13. Murray Ridge Rd and Pinecrest Ave	Signal	AM	14.0	B	14.0	B	0.0	No
		PM	13.5	B	13.2	B	-0.3	No
14. Murray Ridge Rd & I-805 NB ramp	Signal	AM	13.1	B	33.6	C	20.5	No
		PM	37.0	D	148.8	F	111.8	Yes
15. Murray Ridge Rd & I-805 SB ramp	Signal	AM	26.8	C	79.9	E	53.1	Yes
		PM	74.4	E	404.0	F	329.6	Yes
16. Qualcomm Wy & Friars Rd EB ramp	Signal	AM	24.6	C	22.0	C	-2.6	No
		PM	68.5	E	60.8	E	-7.7	No
17. Qualcomm Wy & Friars Rd WB ramp	Signal	AM	26.5	C	27.4	C	0.9	No
		PM	90.3	F	77.1	E	-13.2	No
18. Qualcomm Wy & Rio San Diego Dr	Signal	AM	20.5	C	21.6	C	1.1	No
		PM	38.9	D	44.6	D	5.7	No
19. Rio San Diego Dr & Rio Bonito Wy	Signal	AM	14.6	B	15.5	B	0.9	No
		PM	16.1	B	17.1	B	1.0	No
20. Phyllis Pl & Franklin Ridge Rd	Signal	AM	0.0	-	10.0	A	10.0	No
		PM	0.0	-	18.9	B	18.9	No
21. Via Alta & Franklin Ridge Rd	Signal	AM	37.6	D	44.3	D	6.7	No
		PM	19.3	B	96.2	F	76.9	Yes
22. Via Alta & Civita Blvd	Signal	AM	17.0	B	18.4	B	1.4	No
		PM	18.3	B	25.9	C	7.6	No
23. Civita Blvd & Russell Pkwy/Gill Village Dr	Signal	AM	9.4	A	11.2	B	1.8	No
		PM	28.8	C	21.3	C	-7.5	No
24. Qualcomm Wy & Civita Blvd	Signal	AM	19.1	B	16.4	B	-2.7	No
		PM	23.1	C	21.3	C	-1.8	No

Source: Appendix C

Bold letter indicates substandard LOS E or F.

SI? = Significant Impact

Freeway Ramp Meters

As previously shown in Table 5.2-9, a project is considered to have a significant impact if it degrades the operations of a roadway segment from an acceptable LOS (D or better) to an unacceptable LOS (E or F), or if it adds additional delay to a facility already operating at an unacceptable level.

Table 5.2-18 compares the study area ramp meter performance under Long-Term Year 2035 baseline cumulative conditions and adds the project's contribution. The table displays the change in queue length and delay, which are the basis for identification of significant direct impacts on freeway ramp meters.

As shown in Table 5.2-18, all metered on-ramps within the project study area are projected to operate with fewer than 15 minutes of delay with the exception of the following during the PM peak hour.

- I-805 SB on-ramp at Murray Ridge Road (31 minutes of delay) (**Impact TRAF-18**)

Based on the criteria outlined in Table 5.2-9, the proposed project would cause a significant direct impact on this metered freeway on-ramp.

Table 5.2-18. Ramp Metering: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project

Location	Meter Rate	2035 without Project				2035 with Project				Comparison	
		Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Δ Delay	SI?
AM Peak Hour											
Murray Ridge Rd – I-805 NB on-ramp	851	410	0	0	0	985	134	9	3,886	9	No
PM Peak Hour											
Murray Ridge Rd – I-805 SB on-ramp	691	774	83	7	2,407	1,049	358	31	10,368	31	Yes
Murray Ridge Rd – I-805 SB on-ramp (HOV)	691	86	0	0	0	117	0	0	0	0	No
Source: Appendix C											
SI? = Significant Impact											

Freeway Mainline Segments

For informational purposes, Table 5.2-19 compares the performance of key study area freeway mainline segments under Long-Term Year 2035 conditions with and without the project and displays the changes in V/C ratio and LOS. As shown in Table 5.2-19, if the LOS criteria were to be utilized, the project would result in a significant impact at six freeway segments as the increase in V/C ratio would exceed the City's significance criteria (see Table 5.2-9).

Table 5.2-19. Freeway Mainline Segments: Long-Term Baseline Cumulative Condition vs. Long-Term Cumulative Condition with Project

Freeway Segment	Peak Hour	LOS E Capacity	2035 without Project			2035 with Project		
			PHV	V/C	LOS	PHV	V/C	LOS
I-805 Northbound								
I-8 to Murray Ridge Rd	AM	11,200	18,047	1.388	F	18,124	1.394	F
	PM	13,000	9,108	0.701	C	9,147	0.704	C
Murray Ridge Rd to Mesa College Dr	AM	11,200	18,019	1.386	F	18,515	1.424	F
	PM	11,200	9,094	0.700	C	9,344	0.719	C
Mesa College Dr to SR-163	AM	11,200	16,323	1.256	F	16,755	1.289	F
	PM	11,200	8,237	0.634	C	8,455	0.650	C
I-805 Southbound								
SR-163 to Mesa College Dr	AM	11,200	7,082	0.545	B	7,270	0.559	B
	PM	11,200	16,184	1.245	F	16,612	1.278	F
Mesa College Dr to Murray Ridge Rd	AM	11,200	7,818	0.601	B	8,034	0.618	B
	PM	11,200	17,866	1.374	F	18,358	1.412	F
Murray Ridge Rd to I-8	AM	11,200	7,831	0.529	B	7,864	0.531	B
	PM	13,000	17,894	1.209	F	17,971	1.214	F
Source: Appendix C								
Bold letter indicates substandard LOS E or F.								

As noted in Section 5.2.1.2, Caltrans' Interim Guidance and ultimately the Transportation Analysis Guide and Transportation Impact Study Guidelines are intended to set guidelines for Caltrans to transition away from using delay-based analysis, such as LOS or similar measures for freeway mainline segments, in CEQA project review to refocus the attention of analysis to reducing VMT on the regional circulation network. The proposed project would not add trips to the regional circulation network; rather, vehicle trips would be redistributed to other regional circulation network infrastructure. Therefore, consistent with the Caltrans Interim Guidance, a significant impact would occur if the project would result in a substantial increase in VMT when compared to the baseline condition.

VMT was analyzed for the Long-Term Scenario (Year 2035; see Appendix H). Under 2035 cumulative baseline conditions, the VMT within the study area would be 733,403 in Year 2035. Region-wide, the VMT prior to consideration of the project's contribution would be 1,633,653 in Year 2035.

With the proposed project, VMT within the study area would be 720,196, a 1.8 percent decrease in VMT when compared to the baseline condition in Year 2035. Region-wide, the VMT with the project would be 1,629,137, a 0.28 percent decrease compared to the baseline condition in Year 2035.

Therefore, as the proposed project would reduce VMT within the study area and the region, impacts would be less than significant.

5.2.5.2 Significance of Impacts

Based on the City's significance thresholds outlined in Table 5.2-9, the proposed project would result in significant direct impacts on four roadway segments, three intersections, and one metered freeway on-ramp during the Long-Term scenario. Therefore, mitigation would be required to reduce potential cumulative impacts.

Roadway Segments

- Franklin Ridge Road, from Via Alta to Civita Boulevard (**Impact TRAF-8**)
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-9**)
- Murray Ridge Road, from Pinecrest Avenue to Sandro Rock Road (**Impact TRAF-10**)
- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-11**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-12**)
- Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (**Impact TRAF-13**)

Intersections

- Murray Ridge Road and Sandro Rock Road (**Impact TRAF-14**)
- Murray Ridge Road and I-805 NB ramps (**Impact TRAF-15**)
- Murray Ridge Road and I-805 SB ramps (**Impact TRAF-16**)
- Via Alta and Franklin Ridge Road (**Impact TRAF-17**)

Freeway Ramp Meters

- I-805 SB on-ramp at Murray Ridge Road (**Impact TRAF-18**)

5.2.5.3 Mitigation Measures

The following section summarizes the cumulative impacts identified for the Long-Term scenario (Year 2035) in the previous sections under each of the impact assessment analyses and provides the recommended mitigation measures for these identified impacts.

Roadway Segments

1. **Impact TRAF-8:** Franklin Ridge Road from Via Alta to Civita Boulevard

MM-TRAF-8: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Franklin Ridge Road shall be widened to

accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Franklin Ridge Road would be a four-lane Collector.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway would provide Class II bikeways and a 6-foot-wide sidewalk, separated from the street by an 8-foot-wide parkway; some of these amenities would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

2. **MM-TRAF-9:** Murray Ridge Road from Mission Center Road to Pinecrest Avenue

MM-TRAF-9: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road from Mission Center Road to Pinecrest Avenue shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

3. **Impact TRAF-10:** Murray Ridge Road, from Pinecrest Avenue to Sandrock Road

MM- TRAF-10: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This roadway provides Class II bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, and Serra Mesa Community Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

4. **Impact TRAF-11:** Phyllis Place, from Franklin Ridge Road to I-805 SB ramps

MM-TRAF-11: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from Franklin Ridge Road to I-805 SB ramp shall be ~~reconfigured~~ widened to accommodate five total lanes (three EB and two WB),

including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.

5. **Impact TRAF-12:** Phyllis Place, from I-805 SB ramps to I-805 NB ramps

MM-TRAF-12: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from I-805 SB ramp to I-805 NB ramp shall be restriped to accommodate five total lanes. ~~The new classification for this segment of Phyllis Place will be a four-lane Collector.~~

6. **Impact TRAF-13:** Rio San Diego Drive from Qualcomm Way to Rio Bonito Way

MM-TRAF-13: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the segment of Rio San Diego Drive from Qualcomm Way to Rio Bonito Way shall be reconfigured to include the necessary median commensurate with a four-lane Major Arterial.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. This segment of the roadway is likely to be reclassified as a four-lane Major Arterial as part of the forthcoming update to the Mission Valley Community Plan, which in turn may require a median or other reconfiguration in order to meet that classification. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

Intersections

7. **Impact TRAF-14:** Murray Ridge Road and Sandrock Road

MM-TRAF-14: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the left-turn lanes in both the NB and SB directions will allow both through movements and left turns.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. Currently the intersection geometry provides for bike lanes that would likely be removed under this mitigation. The proposed mitigation would cause a substantial conflict with applicable City land use and mobility policies (e.g., the City's General Plan, Bicycle Master Plan, Pedestrian Master Plan, Serra Mesa Community Plan, and Quarry Falls Specific Plan). Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

8. **Impact TRAF-15:** Murray Ridge Road and I-805 NB ramps

MM-TRAF-15: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.

9. **Impact TRAF-16:** Murray Ridge Road and I-805 SB ramps

MM-TRAF-16: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.

10. **Impact TRAF-17:** Via Alta and Franklin Ridge Road

MM-TRAF-17: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the EB through/right-turn lane will be converted to a left/through/right-turn lane to account for additional EB to NB traffic.

Freeway Ramp Meters

11. **Impact TRAF-18:** I-805 SB on-ramp at Murray Ridge Road

MM- TRAF-18: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the applicant shall contribute a fair share contribution, in coordination with Caltrans, which would be applied toward an additional regular traffic ramp lane on the I-805 SB on-ramp from Murray Ridge Road.

5.2.5.4 Significance after Mitigation

Roadway Segments

As shown in Table 5.2-20, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments.

However, this analysis assumes that the mitigation measures would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following segments:

- Franklin Ridge Road, from Via Alta to Civita Boulevard (**Impact TRAF-8**)
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-9**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-10**)
- Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (**Impact TRAF-13**)

Therefore, impacts at these segments under the Long-Term scenario would be cumulatively significant and unavoidable. Mitigation measures **MM-TRAF-8**, **MM-TRAF-9**, **MM-TRAF-10**, and **MM-TRAF-13** require a variation of widening, restriping, and/or reconfiguration of the affected roadway segments. The potential secondary effects of implementing these mitigation measures are detailed in Section 5.2.5.3, above, and include the removal of bike lanes, sidewalks, or other improvements that would result in conflicts with applicable City land use and mobility policies. It is for these reasons, however, that this analysis assumed that these mitigation measures would not be implemented.

As shown in Table 5.2-20, mitigation would improve LOS at the following segments to an acceptable level:

- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-11**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-12**)

Therefore, impacts at these segments under the Long-Term scenario would be less than significant after mitigation. Mitigation measure **MM-TRAF-11** requires widening the roadway segment of Phyllis Place from Franklin Ridge Road to the I-805 SB ramps (**Impact TRAF-11**), which itself could result in potential secondary impacts. As further discussed in Section 5.5, *Biological Resources*, disturbed habitat is located primarily south along Phyllis Place and dominated by sweet clover, mustards, stork's bill, and brome grasses. Disturbed habitat is not considered sensitive under the City's MSCP Subarea Plan. It is not anticipated that additional right-of-way would be acquired to implement **MM-TRAF-3**. However, if additional space was required, **MM-TRAF-11** would not result in any impacts on sensitive habitat, and the loss of disturbed habitat would be considered a less-than-significant impact. Accordingly, implementation of **MM-TRAF-11** would result in less-than-significant secondary impacts. Regarding mitigation measure **MM-TRAF-12**, which requires restriping from the I-805 SB ramps to the I-805 NB ramps along Phyllis Place, the generation of any criteria pollutant and GHG emissions during restriping of the impacted roadway segments would be temporary and minor. Furthermore, the new lanes that would be added along the impacted roadway segment as a result of the restriping would not generate any new vehicle trips, but would merely accommodate the additional traffic that would be redistributed onto these roadway segments as a result of the proposed project. Therefore, secondary impacts associated with the implementation of **MM-TRAF-12** would be less than significant.

Intersections

As shown in Table 5.2-21~~2~~, if mitigation were fully implemented, there would be less-than-significant impacts at the following intersection. However, this analysis assumes that the mitigation measure would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following intersection:

- Murray Ridge Road and Sandrock Road (**Impact TRAF-14**)

Therefore, impacts at this intersection under the Long-Term scenario would be cumulatively significant and unavoidable. Mitigation measure **MM-TRAF-14** requires reconfiguration of the impacted intersection of Murray Ridge Road and Sandrock Road. The potential secondary effects of implementing this mitigation measure is detailed in Section 5.2.5.3, above, and includes the removal of bike lanes that would result in conflicts with applicable City land use and mobility policies. It is for these reasons, however, that this analysis assumed that this mitigation measure would not be implemented.

As shown in Table 5.2-21, mitigation would improve LOS to an acceptable level in the AM peak hour at the following intersections; however, mitigation would not improve LOS to an acceptable level at the following intersections in the PM peak hour.

- Murray Ridge Road/I-805 NB ramps; PM peak hour (**Impact TRAF-15**)
- Murray Ridge Road/I-805 SB ramps; PM peak hour (**Impact TRAF-16**)

Therefore, impacts at these intersections in the PM peak hour under the Long-Term scenario would be cumulatively significant and unavoidable. Mitigation measures **MM-TRAF-15** and **MM-TRAF-16** require the widening of the I-805 SB ramps and I-805 NB ramps, respectively, at Murray Ridge Road.

While the widening itself could result in potential secondary impacts, both on-ramps have shoulders that are several feet wide on each side. A reduction of the shoulder would not have a significant impact on the environment. Moreover, if additional space was required, there are areas along the shoulder that are heavily disturbed. A loss of a small amount of heavily disturbed ruderal vegetation would be a less-than-significant impact. Accordingly, implementation of **MM-TRAF-15** and **MM-TRAF-16** would result in less-than-significant secondary impacts.

As shown in Table 5.2-21, mitigation would improve LOS at the following intersection to an acceptable level.

- Via Alta/Franklin Ridge Road; PM peak hour (**Impact TRAF-17**)

Therefore, impacts at these intersections in the respective peak hours under the Long-Term scenario would be less than significant. The implementation of mitigation measure **MM-TRAF-17** would result in less-than-significant secondary impacts because it involves the reconfiguration of the Via Alta and Franklin Ridge Road intersection to better accommodate additional traffic and would not require any additional right-of-way.

Freeway Ramp Meters

Table 5.2-22 shows the post-mitigation measure LOS for impacted freeway ramp meters. As shown, mitigation would improve delay at the following ramp meter to an acceptable level.

- I-805 SB on-ramp at Murray Ridge Road (**Impact TRAF-18**)

Therefore, impacts at this ramp meter under the Long-Term scenario would be less than significant. Implementation of mitigation measure **MM-TRAF-18** does not directly involve any physical improvements; however, it would require contribution of a fair-share payment toward physically improving the I-805 SB on-ramp at Murray Ridge Road. The I-805 SB on-ramp has shoulders that are several feet wide on each side. A reduction of the shoulder would not have a significant impact on the environment. Moreover, if additional space was required, there are areas along the shoulder that are heavily disturbed. A loss of a small amount of heavily disturbed ruderal vegetation would be a less-than-significant impact. Accordingly, implementation of **MM-TRAF-18** would result in less-than-significant secondary impacts.

Table 5.2-20. Roadway Segments: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated)

	2035 with Project					2035 with Project with Mitigation				Comparison	
Location	Classification	LOS E Capacity	ADT	V/C	LOS	Mitigated Classification	LOS E Capacity	V/C	LOS	V/C	MI?
Franklin Ridge Rd											
Via Alta to Civita Blvd	2C CL*	15,000	20,919	1.395	F	4C	30,000	0.697	D	-0.698	Yes*
Murray Ridge Rd											
Mission Center Rd to Pinecrest Ave	2C CL	15,000	24,345	1.623	F	4C	30,000	0.812	D	-0.811	Yes*
Pinecrest Ave to Sandrock Rd	2C CL	15,000	18,345	1.223	F	4C	30,000	0.612	C	-0.611	Yes*
Phyllis Pl											
Franklin Ridge Rd to I-805 SB ramp	2C NF	10,000	34,540	3.454	F	5M	45,000	0.768	C	-2.686	Yes
I-805 SB ramp to I-805 NB ramp	2C CL	15,000	24,037	1.602	F	4C	30,000	0.801	D	-0.801	Yes
Rio San Diego Dr											
Qualcomm Wy to Rio Bonito Wy	4C	30,000	28,033	0.934	E	4M	40,000	0.701	C	-0.233	Yes*
Source: Appendix C; Bold letter indicates substandard LOS E or F. MI? = Mitigated?											
* Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume this mitigation will occur. In the event it does not, the impact would remain significant and unavoidable.											

Table 5.2-21. Intersections: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated)

Location	Traffic Control	Peak Hour	2035 with Project		2035 with Project with Mitigation		Comparison	
			Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Δ Avg. Delay (sec.)	MI?
Murray Ridge Rd and Sandrock Rd	Signal	AM	19.7	B	22.8	C	3.1	n/a
		PM	58.4	E	24.5	C	-33.9	Yes*
Murray Ridge Rd & I-805 NB ramp	Signal	AM	33.6	C	20.5	C	-13.1	n/a
		PM	148.8	F	56.0	E	-92.8	No
Murray Ridge Rd & I-805 SB ramp	Signal	AM	79.9	E	21.0	C	-58.9	Yes
		PM	404.0	F	112.5	F	-291.5	Yes
Via Alta & Franklin Ridge Rd	Signal	AM	44.3	D	39.8	D	-4.5	n/a
		PM	96.2	F	54.6	D	-41.6	Yes

Source: Appendix C.

Bold letter indicates substandard LOS E or F.

MI? = Mitigated?

n/a = Not applicable

* Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume this mitigation will occur. In the event it does not, the impact would remain significant and unavoidable.

Table 5.2-22. Ramp Metering: Long-Term Cumulative Baseline Condition Plus Project (Unmitigated Vs. Mitigated)

Location	Meter Rate	2035 with Project				2035 with Project with Mitigation				Comparison	
		Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Demand (veh/hr)	Excess Demand (veh/hr)	Delay (min)	Queue (ft)	Δ Delay	MI?
PM Peak Hour											
Murray Ridge Rd – I-805 SB on-ramp (Lane #1)	691	1,049	358	31	10,368	525	0	0	0	-31	Yes
Murray Ridge Rd – I-805 SB on-ramp (Lane #2 – new lane)	691	Does not exist under this scenario				525	0	0	0	0	Yes
Murray Ridge Rd – I-805 SB on-ramp (Lane #3 – HOV lane)	691	117	0	0	0	117	0	0	0	0	Yes
Source: Appendix C. Bold letter indicates substandard LOS E or F. n/a = Not applicable											

5.2.6 Impact Analysis

Issue 4: Traffic Hazards

Would the proposed project result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway)?

5.2.6.1 Impact Discussion

The proposed roadway and access points have been conceptually designed to be consistent with the City's *Street Design Manual* and would not create a hazard for vehicles, bicycles, or pedestrians using the proposed roadway connection. The City's *Street Design Manual* (2002) contains guidelines for the physical design of streets that consider the needs of all users of the public right-of-way. The manual includes provisions for street trees, traffic calming, and pedestrian design guidelines, and addresses how to create streets that are important public places. The road connection would include bicycle lanes and a sidewalk for pedestrians, which would be consistent with the City's *Street Design Manual* (2002).

The proposed roadway would be approximately 460 feet long and classified as a four-lane Major street with an approximately 120-foot right-of-way and would include a design speed of 55 mph. The posted speed for the roadway may be different from the design speed. However, the posted speed cannot be determined before the facility is in operation. After the project is completed, the City would resurvey the roadway traffic and set the posted speed limits based on the factors determined by that survey, including but not limited to the 85th percentile speed. The posted speed would not exceed the design speed and safety would be a primary consideration for the limit set.

As previously detailed in Chapter 3, *Project Description*, City View Church, located on the north side of Phyllis Place, has a 50-foot-wide driveway that provides access to the Church's parking lot. The proposed roadway connection would not align with the City View Church driveway, as it would be located approximately 150 feet west of the driveway. This is because the roadway connection is required to be farther west in order to provide adequate sight distance due to the slight curve along Phyllis Place from the I-805 ramps. Therefore, the intersection at Phyllis Place and the proposed roadway would not directly align with the City View Church driveway.

As the roadway alignment cannot be shifted east to align with the driveway due to sight distance requirements, the driveway itself would need to be moved approximately 150 feet to the west, thus creating a four-way intersection at Phyllis Place. However, as City View Church is privately owned, it is assumed for purposes of this analysis that the driveway would not be realigned as part of the proposed project. Therefore, the proposed project would have the potential to result in a safety hazard for vehicles entering or exiting the City View Church, as sight distance from the driveway to the intersection would likely not be sufficient. Impacts related to traffic hazards would therefore be potentially significant (**Impact TRAF-19**), and mitigation is required.

5.2.6.2 Significance of Impact

The proposed project would require a signalized intersection along Phyllis Place, which would in turn result in possibly unsafe conditions for motorists entering or exiting the City View Church

parking lot, as the driveway would be approximately 150 feet east of the signalized intersection. Therefore, impacts would be potentially significant and mitigation is required.

5.2.6.3 Mitigation Measures

MM-TRAF-19: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the City View Church driveway shall be relocated as part of the four-way intersection design with the proposed roadway connection and Phyllis Place.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. The City View Church is a privately owned property. The relocation of the driveway may in turn require the removal of trees and the reconfiguration of other internal access considerations within the Church property, such as the drop-off area in front of the church that is connected to the existing driveway. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

5.2.6.4 Significance after Mitigation

If mitigation were fully implemented, traffic hazard impacts would be reduced to less-than-significant levels. However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable (**Impact TRAF-19**).

The potential secondary effects of implementing mitigation measure **MM-TRAF-19** are detailed in Section 5.2.6.3, above, and include the removal of trees and the reconfiguration of other internal access considerations within the City View Church property. As described above, for reasons associated with the church's existing permits, however, this analysis assumed that this mitigation measure would not be implemented.

5.2.7 Impact Analysis

Issue 5: Public Access

Would the project substantially alter present circulation movements including effects on existing public access to beaches, parks, or other open space areas?

5.2.7.2 Impact Discussion

The traffic study (Appendix C) evaluated effects that the potential road connection would have on emergency access, evacuation access to social, educational resources, and commercial shopping as well as the service needs of the affected communities on either side of the potential connection. To understand community access, two reference points were measured to and from which the relative access times could be measured both with and without the road connection. The analysis looked at access to hospitals, fire and emergency medical services, educational facilities, parks, libraries, community centers, and other recreational facilities. The times to each facility were averaged for the two reference points and are presented in Table 5.2-23.

Table 5.2-23. Community Access Travel Times

Facility Type	Representative Accessibility Time Traveled (min.)	
	Without Project	With Project
Hospitals	39	31
Fire departments	42	32
Schools	153	135
Libraries	40	32
Shopping centers	69	57
Parks	58	50
Source: Appendix C		

As the table demonstrates, accessibility to a variety of public facilities and amenities increases with the road connection. In addition, as previously detailed within Sections 5.2.4 and 5.2.5, VMT within the study area and region-wide would decrease with implementation of the proposed project.

Emergency evacuation and routing were also considered. Currently there is only one route of access to the more than 200 homes in Serra Mesa at the western end of Phyllis Place on the north rim of Mission Valley. This public access route is via Phyllis Place leading to I-805 or farther to the east and continuing on surface streets like Murray Ridge Road. Also, Phyllis Place is constructed as a two-lane Collector street having a nominal (i.e., policy-based rather than actual) capacity of 8,000 vehicles per day. By introducing a connection between Mission Valley and Serra Mesa via the proposed road connection, a second choice for evacuation could exist for these homes, but only in part. They would still have to get to the intersection of the newly created roadway to Mission Valley using Phyllis Place as a two-lane roadway. Consequently, there is limited additional benefit to these more than 200 homes for evacuation by having a road connection, and all of the other surrounding communities have multiple ingress or egress routes. It should be noted that emergency access currently exists from Aperture Circle in Quarry Falls to Serra Mesa via Kaplan Drive. However, the current configuration at Kaplan Drive, while paved, has locked bollards and is only intended for emergency access, at which time emergency personnel would need to unlock the bollards. Kaplan Drive is not intended as secondary access. As such, Kaplan Drive is not as easily accessible for emergency responders within the area surrounding the proposed roadway connection. Therefore, the proposed roadway connection would improve emergency access in the project area by providing an additional access point and one that would not include any barriers.

Additionally, the presence or absence of the road connection is not a differentiating factor relative to deliveries to residences and businesses, postal delivery, utility servicing, and trash pickup. Service is now being provided for these activities, and it would continue to be provided whether or not there is a connection between the two communities via the road connection. If a connection were to exist it might represent an opportunity to redefine some of the routing for delivery drivers and therefore create an efficiency for UPS and/or the U.S. Postal Service, for example, but the ability to continue to provide service would not be affected. Service would continue either way.

5.2.7.3 Significance of Impact

Implementation of the proposed roadway would provide a link between the two planning area boundaries, where one does not exist today, creating a new connection between Serra Mesa and

Mission Valley, while also reducing VMT within the study area and the region. Construction of the roadway would provide additional ingress and egress off Phyllis Place and provide for a more efficient, integrated circulation network for Serra Mesa and Mission Valley that would improve access in the area. Furthermore, the project would provide an additional link for pedestrians and cyclists. It would also link those using vehicles within Serra Mesa to the Quarry Falls site and the greater Mission Valley community, providing access to community parks and making transit services more readily available. Impacts would be less than significant.

5.2.7.4 Mitigation Measures

No mitigation would be required.

5.2.8 Impact Analysis

Issue 6: Alternative Transportation

Would the proposal result in a conflict with adopted policies, plans, or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?

5.2.8.2 Impact Discussion

Bicycle Facilities

Currently, bicycle access exists between Quarry Falls and the Serra Mesa community via Kaplan Drive. The City's Bicycle Master Plan ~~Update~~ proposes Class II (Bike Lane) facilities along Phyllis Place, Via Alta, Franklin Ridge Road, and Civita Boulevard. The Class II Bike Lane is shown connecting north toward Phyllis Place and across I-805 to Murray Ridge Road. It is also shown connecting to Friars Road from two points on the south from Civita Boulevard. The proposed project would provide bicycle connectivity from Phyllis Place southward to Via Alta and Franklin Ridge Road. The proposed project would therefore increase bicycle network connectivity between the Serra Mesa and Mission Valley communities by providing an additional point of bicycle access, and thus would not conflict with overarching goals and policies of transit plans to provide balanced and safe bicycle networks within and between communities. In addition, one of the goals of the Bicycle Master Plan ~~Update~~ is to increase the number of bicycle-to-transit trips by providing safe routes to transit stops and stations. The proposed project would "complete" a Class II facility that would allow a dedicated bicycle connection from Phyllis Place southward past Friars Road to the Rio Vista trolley stop, approximately 4,000 feet away from the proposed roadway. This connection would allow cyclists north of the project site to utilize a dedicated bike lane to access the trolley stop. Therefore, the project would not be in conflict with planned bicycle network improvements as envisioned in local alternative transportation planning documents and impacts would be less than significant.

Pedestrian Facilities

Currently, pedestrian access exists between Quarry Falls and the Serra Mesa community via Kaplan Drive. The proposed project would include sidewalks along both sides of the roadway, thus allowing a dedicated pedestrian connection between the Mission Valley and Serra Mesa communities in the vicinity of Phyllis Place. The proposed project would therefore increase pedestrian connectivity between communities by providing an additional point of pedestrian access. The City's Pedestrian Master Plan (City of San Diego 2006) and subsequent updates have identified planning efforts for

several communities within the City, although there are currently no plans for the Mission Valley and Serra Mesa communities. The Pedestrian Master Plan does state that “pedestrian attractors” are typically schools, transit stations, parks facilities, neighborhood retail, and community-serving destinations (e.g., libraries, post offices). The proposed roadway is approximately 4,000 feet northeast of the Rio Vista trolley stop. The proposed roadway will also be adjacent to commercial uses, parks, and potentially a school use within the Quarry Falls development. Therefore, the project would generally increase pedestrian connectivity in an area that is adjacent to transit and other “pedestrian attractors” such as commercial uses and parks. Overall, the project would not conflict with the Pedestrian Master Plan and impacts would be less than significant.

Alternative Transit Modes

Transit opportunities in the vicinity of the project site include bus service and the trolley, both of which are operated by MTS. As previously detailed in Chapter 2, *Environmental Setting*, there are numerous bus routes that serve both the Mission Valley and Serra Mesa communities but also provide access to the Fashion Valley Transit Center, where commuters can then board the trolley.

Although several bus routes traverse the Mission Valley and Serra Mesa communities, the most pertinent to the vicinity of the project site include MTS bus routes 25 and 928. MTS route 25 runs from the Fashion Valley Transit Center northeast through Linda Vista, Mesa College, along Aero Drive in Serra Mesa, east to Tierrasanta, then back west ending at Kearny Mesa Transit Center. MTS route 928 also begins at the Fashion Valley Transit Center and runs northeast toward the vicinity of the project site via Mission Center Road, through Serra Mesa via Murray Ridge Road, then eventually north to the Kearny Mesa Transit Center via Ruffin Road. The proposed project would generally increase connectivity between Serra Mesa and Mission Valley, and would not interfere with any existing MTS bus routes. The proposed roadway could provide for a bus route connection from Serra Mesa to the existing trolley stops at Rio Vista or Mission Valley Center; however, the bus routes are planned, owned, and operated by MTS and any new route would need to be implemented by MTS.

There are two trolley stations in the vicinity of the project site (see Figure 2-5): the Rio Vista Station and the Mission Valley Center Station. The Rio Vista Station is not currently served by any MTS bus routes and does not have any dedicated parking for transit users. The Mission Valley Center Station is served by MTS bus route 6, which runs from Fashion Valley to North Park via Camino de la Reina, Texas Street, and El Cajon Boulevard. There is no dedicated parking for transit users at the Mission Valley Center Station. Therefore, there are currently no bus routes that provide access to Mission Valley Center or Rio Vista Station, nor are there parking opportunities at either of these trolley stations in the vicinity of the project site. Although the project would not directly provide for a bus route to the Rio Vista or Mission Valley Center trolley stops, the project would provide a connection for pedestrians and cyclists in the vicinity of the project site to access the trolley stations. Overall, the project would not conflict with existing or planned modes of alternative transportation and impacts would be less than significant.

5.2.8.3 Significance of Impact

The proposed project would provide a connection for pedestrians and cyclists in the vicinity of the project site. It would implement the planned Class II Bike Lane facility that is included within the City’s Bicycle Master Plan ~~update~~. The proposed project would also complete the pedestrian and bicycle network northward to Phyllis Place, which would provide a connection for pedestrians and cyclists to travel southward to trolley stations, and vice versa. The project would not conflict with

any existing bus routes and may provide the opportunity for an additional bus route in the future, which would ultimately be up to the discretion of MTS. Impacts would be less than significant.

5.2.8.4 Mitigation Measures

No mitigation would be required.

5.3 Air Quality

This section discusses existing air quality conditions within the vicinity of project site and evaluates impacts on air quality that could occur as a result of the project. Impacts associated with implementation of the proposed project are assessed using the City of San Diego's Significance Determination Thresholds (2016), which is based on the San Diego Air Pollution Control District (SDAPCD) regulatory thresholds.

5.3.1 Existing Conditions

5.3.1.1 Climate and Topography

The weather in the San Diego Air Basin (SDAB), as in most of Southern California, is influenced by the Pacific Ocean and its semipermanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges (in degrees Fahrenheit [°F]) from the mid-40s to the high 90s. Most of the region's precipitation occurs between November and April, with infrequent (approximately 10%) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches; this average increases with elevation as moist air is lifted over the mountains.

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east; along with local meteorology, topography influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers.

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and influences the direction of prevailing winds (westerly to northwesterly). Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses can also trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce ozone (O₃), commonly known as smog.

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and nitrogen oxides (NO_x) emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Because CO is produced almost entirely from emissions generated by gasoline- and diesel-fueled automobiles, the

highest CO concentrations in the basin are associated with heavy traffic. Nitrogen dioxide (NO₂) levels are also generally higher during fall and winter days.

Under certain conditions, atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County. This transport often produces high O₃ concentrations, as measured at air pollutant monitoring stations within the county. The transport of air pollutants from Los Angeles to San Diego has also occurred within the stable layer of the elevated subsidence inversion, where high levels of O₃ are transported.

5.3.1.2 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O₃, NO₂, CO, sulfur dioxide (SO₂), PM₁₀ (particulate matter [PM] 10 micrometers or less in diameter), PM_{2.5} (particulate matter 2.5 micrometers or less in diameter), and lead (Pb) (see Table 5.3-1). These pollutants are discussed in the following paragraphs.¹ As discussed in Section 5.3.2, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants in California.

Ozone. O₃ is a colorless gas that is formed in the atmosphere when reactive organic gases (ROGs), sometimes referred to as volatile organic compounds, and NO_x react in the presence of ultraviolet sunlight. O₃ is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x, the precursors of O₃, are emissions resulting from automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ formation, and ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. Short-term exposures (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide. Most NO₂, like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. High concentrations of NO₂ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis and some increase in bronchitis in children (2 and 3 years old) has also been observed at concentrations below 0.3 parts per million by volume (ppm).

Carbon Monoxide. CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as where the project site is located,

¹ The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the U.S. Environmental Protection Agency's *Six Common Air Pollutants* (2014) and the California Air Resources Board's *Glossary of Air Pollutant Terms* (2015).

automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide. SO₂ is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. The main sources of SO₂ are coal and oil used in power plants and industries; as such, the highest levels of SO₂ are generally found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.

Particulate Matter. PM pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. PM can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{2.5} and PM₁₀ represent fractions of PM. Fine PM (PM_{2.5}) is roughly 1/28 the diameter of a human hair. PM_{2.5} results from fuel combustion (e.g., motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as SO_x, NO_x, and VOC. Inhalable or coarse PM (PM₁₀) is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport absorbed gases, such as chlorides or ammonium, into the lungs, also causing injury. Whereas PM₁₀ particles tend to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead. Pb in the atmosphere occurs as PM. Sources of Pb include leaded gasoline; the manufacturing of batteries, paint, ink, ceramics, and ammunition; and secondary Pb smelters. Before 1978, mobile emissions were the primary source of atmospheric Pb. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne Pb by nearly 95%. With the phase-out of

leaded gasoline, secondary Pb smelters, battery recycling, and manufacturing facilities are becoming Pb-emission sources of greater concern.

Prolonged exposure to atmospheric Pb poses a serious threat to human health. Health effects associated with exposure to Pb include gastrointestinal disturbances, anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level Pb exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Toxic Air Contaminants

A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a toxic air contaminant (TAC). Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as automobiles; and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced either on short-term (acute) or long-term (chronic) exposure to a given TAC. Unlike criteria pollutants, there are currently no ambient air quality standards for TACs.

5.3.1.3 Local Air Quality

Air Quality Monitoring Data

SDAPCD operates a network of ambient air monitoring stations throughout San Diego County that measure ambient concentrations of pollutants and determine whether the ambient air quality meets the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS). SDAPCD monitors air quality conditions at 10 locations throughout the basin. The closest monitoring station to the proposed project is the Kearny Villa Road station, approximately 4.2 miles north of the project site. Due to its proximity to the project site, the Kearny Villa monitoring station concentrations for all pollutants, except CO and SO₂, are considered most representative of the project site. CO data were taken from the Beardsley Street station, approximately 6 miles south of the project site. Currently, no California Air Resources Board (CARB) monitoring stations in San Diego County monitor for SO₂.

Table 5.3-1 summarizes available air quality monitoring data obtained from CARB for the Kearny Villa Road and Beardsley Street monitoring stations. These data represent air quality monitoring data for the years 2013–2015. Monitoring data concentrations are expressed in terms of ppm or micrograms per cubic meter (µg/m³). As indicated in Table 5.3-1, the monitoring stations have only experienced violations of the state and federal O₃ standards.

Table 5.3-1. Ambient Air Quality Data

Pollutant Standard	2013	2014	2015
Ozone (O₃)			
Maximum 1-hour concentration (ppm)	0.081	0.099	0.077
Maximum 8-hour concentration (ppm)	0.070	0.081	0.070
<i>Number of days standard exceeded^a</i>			
CAAQS 1-hour (>0.09 ppm)	0	1	0
NAAQS 8-hour (>0.075 ppm)	0	1	0
CAAQS 8-hour (>0.07 ppm)	1	4	0
Carbon Monoxide (CO)			
Maximum 8-hour concentration (ppm)	2.1	1.9	1.9
Maximum 1-hour concentration (ppm)	3.0	2.7	2.6
<i>Number of days standard exceeded^a</i>			
NAAQS 8-hour (>9 ppm)	0	0	0
CAAQS 8-hour (>9.0 ppm)	0	0	0
NAAQS 1-hour (>35 ppm)	0	0	0
CAAQS 1-hour (>20 ppm)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration (ppm)	67	51	51
State second-highest 1-hour concentration (ppm)	57	51	49
Annual average concentration (ppm)	11	10	9
<i>Number of days standard exceeded^a</i>			
CAAQS 1-hour standard (0.18 ppm)	0	0	0
PM10^b			
National maximum 24-hour concentration (µg/m ³) ^c	39.0	39.0	39.0
State maximum 24-hour concentration (µg/m ³) ^d	38.0	34.0	29.0
National annual average concentration (µg/m ³)	38.0	39.0	37.0
State annual average concentration (µg/m ³) ^e	37.0	34.0	29.0
<i>Number of days standard exceeded^a</i>			
NAAQS 24-hour (>150 µg/m ³) ^f	0	0	0
CAAQS 24-hour (>50 µg/m ³) ^f	0	0	0

Pollutant Standard	2013	2014	2015
PM2.5 ^b			
National maximum 24-hour concentration ($\mu\text{g}/\text{m}^3$) ^c	22.0	20.2	25.7
State maximum 24-hour concentration ($\mu\text{g}/\text{m}^3$) ^d	22.0	20.2	25.7
National annual average concentration ($\mu\text{g}/\text{m}^3$)	8.3	8.1	7.2
State annual average concentration ($\mu\text{g}/\text{m}^3$) ^e	8.3	8.2	-
<i>Number of days standard exceeded^a</i>			
NAAQS 24-hour ($>35 \mu\text{g}/\text{m}^3$) ^f	0	0	0

Sources: California Air Resources Board 2016b; U.S. Environmental Protection Agency 2016a

- = Insufficient data available to determine the value

^a An exceedance is not necessarily a violation.

^b Measurements usually are collected every 6 days.

^c National statistics are based on standard conditions data. In addition, national statistics are based on samplers using federal reference or equivalent methods.

^d State statistics are based on local conditions data, except in the South Coast Air Basin, for which statistics are based on standard conditions data. In addition, state statistics are based on California-approved samplers.

^e State criteria for ensuring that data are sufficiently complete for calculating valid annual averages are more stringent than the national criteria.

^f Mathematical estimate of how many days concentrations would have been measured as higher than the level of the standard had each day been monitored.

SDAB Attainment Designation

Areas are classified as in *attainment* or *nonattainment* with respect to the NAAQS and CAAQS. These classifications are made by comparing actual monitored air pollutant concentrations to state and federal standards. If a pollutant concentration is lower than the state or federal standard, the area is considered to be in attainment of the standard for that pollutant. If pollutant levels exceed a standard, the area is considered a nonattainment area. If data are insufficient to determine whether a pollutant is violating the standard, the area is designated as unclassified. This classification typically occurs in nonurbanized areas, where pollutant levels may be less closely monitored.

Table 5.3-2 summarizes SDAB's federal and state attainment designations for each of the criteria pollutants.

Table 5.3-2. San Diego Air Basin Attainment Classification

Pollutant	Federal Designation	State Designation
O ₃ (1-hour)	Attainment (maintenance) ¹	Nonattainment
O ₃ (8-hour – 1997) (8-hour – 2008)	Attainment (maintenance) Nonattainment (marginal)	Nonattainment
CO	Attainment (maintenance) ²	Attainment
PM10	Unclassifiable/attainment ³	Nonattainment
PM2.5	Unclassifiable/attainment ⁴	Nonattainment
NO ₂	Unclassifiable/attainment	Attainment
SO ₂	Attainment	Attainment

Pollutant	Federal Designation	State Designation
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassified
Visibility-Reducing Particles	(No federal standard)	Unclassified

Sources: U.S. Environmental Protection Agency 2016b (Federal Designation); California Air Resources Board 2016c (State Designation).

¹ The federal 1-hour standard of 0.12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans. The San Diego area of the SDAB is designated as attainment/maintenance, while the Imperial County area is designated as nonattainment/Sec.185A area.

² The western and central portions of the SDAB are designated attainment (maintenance), while the eastern portion is designated unclassifiable/attainment.

³ The Imperial Valley planning area of the SDAB is designated as nonattainment/serious, while the western portion of the SDAB is designated as unclassifiable/attainment.

⁴ A portion of Imperial County is designated as nonattainment, while all other portions of the SDAB are designated as unclassifiable/attainment.

5.3.1.4 Sensitive Receptors

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed “sensitive receptors” are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by CARB, include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The closest sensitive receptors are City View Church and the single-family residential development to the north of Phyllis Place approximately 330 feet from the project site, residential units associated with the Quarry Falls project approximately 300 feet from the project site, and single-family residential development to the west approximately 760 feet from the project site. It should be noted that planned residential development within Quarry Falls would be located approximately 100 feet west of the roadway once constructed.

5.3.2 Regulatory Framework

5.3.2.1 Federal

Clean Air Act

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The U.S. Environmental Protection Agency (EPA) is responsible for implementing most aspects of the CAA, including setting the NAAQS for major air pollutants, hazardous air pollutant standards, approval of state attainment plans, motor vehicle emission

standards, stationary source emission standards and permits, acid rain control measures, stratospheric O₃ protection, and enforcement provisions.

NAAQS are established for “criteria pollutants” under the CAA, which are O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and Pb. The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O₃, NO₂, SO₂, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O₃, NO₂, SO₂, PM₁₀, and PM_{2.5} are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The CAA requires EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a State Implementation Plan that demonstrates how those areas will attain the standards within mandated timeframes.

5.3.2.2 State

California Clean Air Act

The federal CAA delegates the regulation of air pollution control and the enforcement of the NAAQS to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB, which is part of the California Environmental Protection Agency, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal CAA, and regulating emissions from motor vehicles and consumer products. CARB has established the CAAQS, which are more restrictive than NAAQS. The CAAQS describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. The CAAQS for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, PM₁₀, PM_{2.5}, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. Table 5.3-3 presents the NAAQS and CAAQS.

Table 5.3-3. Ambient Air Quality Standards

Pollutant	Average Time	California Standards ¹	National Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
O ₃	1 hour	0.09 ppm (180 µg/m ³)	—	Same as Primary Standard
	8 hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	
CO	1 hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	None
	8 hours	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	
NO ₂ ⁶	1 hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	Same as Primary Standard
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	
SO ₂ ⁷	1 hour	0.25 ppm (655 µg/m ³)	0.75 ppm (196 µg/m ³)	—
	3 hours	—	—	0.5 ppm (1300 µg/m ³)
	24 hours	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas)	—

Pollutant	Average Time	California Standards ¹	National Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)	—
PM10 ⁸	24 hours	50 µg/m ³	150 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m ³	—	
PM2.5 ⁸	24 hours	—	35 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m ³	12.0 µg/m ³	15.0 µg/m ³
Pb ^{9,10}	30-day Average	1.5 µg/m ³	—	—
	Calendar Quarter	—	1.5 µg/m ³ (for certain areas)	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m ³	Same as Primary Standard
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m ³)	—	—
Vinyl chloride ⁹	24 hour	0.01 ppm (26 µg/m ³)	—	—
Sulfates	24 hour	25 µg/m ³	—	—
Visibility reducing particles ¹	8 hour (10:00 a.m. to 6:00 p.m. PST)	See footnote 11	—	—

Source: California Air Resources Board 2016a

¹ California standards for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, suspended particulate matter (PM10, PM2.5), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. The CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

² National standards (other than O₃, NO₂, SO₂, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For NO₂ and SO₂, the standard is attained when the 3-year average of the 98th and 99th percentile, respectively, of the daily maximum 1-hour average at each monitor within an area does not exceed the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

³ Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr.

Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

⁴ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

⁵ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

⁶ To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

⁷ On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-

Pollutant	Average Time	California Standards ¹	National Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.				
⁸ On December 14, 2012, the national annual PM _{2.5} primary standard was lowered from 15 µg/m ³ to 12 µg/m ³ . The existing national 24-hour PM _{2.5} standards (primary and secondary) were retained at 35 µg/m ³ , as was the annual secondary standard of 15 µg/m ³ . The existing 24-hour PM ₁₀ standards (primary and secondary) of 150 µg/m ³ were also retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.				
⁹ CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.				
¹⁰ The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m ³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.				
¹¹ In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.				

Toxic Air Contaminants

California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (Assembly Bill 2588). The Tanner Act sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and has adopted EPA’s list of hazardous air pollutants as TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate best available control technology for toxics to minimize emissions. None of the TACs identified by CARB have a safe threshold.

Under the Air Toxics “Hot Spots” Act, existing facilities that emit air pollutants above specified level were required to (1) prepare a TAC emission inventory plan and report, (2) prepare a risk assessment if TAC emissions were significant, (3) notify the public of significant risk levels, and (4) prepare and implement risk reduction measures if health impacts were above specified levels.

California Health and Safety Code, Section 41700

This section of the California Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

5.3.2.3 Local

San Diego Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The proposed project is located within the SDAB and is subject to SDAPCD guidelines and regulations. In San Diego County, O₃ and PM are the pollutants of main concern, as exceedances of CAAQS for those pollutants are experienced here in most years.

SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the various clean air plans for attainment and maintenance of the ambient air quality standards in the SDAB. The *Regional Air Quality Strategy* (RAQS) for the SDAB was initially adopted in 1991 and is updated on a triennial basis, most recently with the 2016 RAQS Revision. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O₃. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County and the cities in the county, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans. Note that while the SDAB is designated as nonattainment for the state PM₁₀ and PM_{2.5} air quality standards, the RAQS does not currently address PM₁₀ or PM_{2.5}.

The *Final 2016 O₃ Attainment Plan and the Reasonably Available Control Technology (RACT) Demonstration* is SDAPCD's plan to attain the federal 8-hour O₃ standard (San Diego Air Pollution Control District 2016). In this plan, SDAPCD relies on the RAQS to demonstrate how the region will comply with the federal O₃ standard. The RAQS details how the region will manage and reduce O₃ precursors (NO_x and ROG) by identifying measures and regulations intended to reduce these contaminants. The control measures identified in the RAQS generally focus on stationary sources; however, the emissions inventories and projections in the RAQS address all potential sources, including those under the authority of CARB and EPA. Incentive programs for reduction of emissions from heavy-duty diesel vehicles, off-road equipment, and school buses are also established in the RAQS. In addition, the *Measures to Reduce Particulate Matter in San Diego County* report addresses implementation of Senate Bill 656 in San Diego County (Senate Bill 656 required additional controls to reduce ambient concentrations of PM₁₀ and PM_{2.5}). In the report, SDAPCD evaluates sources of PM and potential source-control measures, focusing on the implementation of additional measures that would reduce PM emissions associated with residential wood combustion and fugitive dust from construction sites and unpaved areas.

The following SDAPCD rules and regulations would apply to the proposed project.

- Regulation IV: Prohibitions; Rule 51: Nuisance. Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
- Regulation IV: Prohibitions; Rule 55: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions,

including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

5.3.3 Significance Determination Thresholds

5.3.3.1 Issue Questions

The City's Significance Determination Thresholds (2016) state that a project would have a significant environmental impact if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations;
4. Exceed 100 pounds per day of PM₁₀ dust;
5. Create objectionable odors affecting a substantial number of people; or
6. Substantially alter air movement in the area of the project.

5.3.3.2 Methodology and Assumptions

The State CEQA Guidelines state that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the significance determination of whether a project would violate or impede attainment of air quality standards. As part of its air quality permitting process, SDAPCD has established air quality impact analysis Trigger Levels in Rule 20.2 requiring the preparation of air quality impact assessments for permitted stationary sources. The City has established numerical screening criteria for analyzing the significance of regional pollutant emissions based on these air quality impact analysis Trigger Levels. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable City of San Diego screening criteria and SDAPCD air quality significance thresholds presented in Table 5.3-4 are exceeded.

For purposes of CEQA, these screening criteria can be used as numeric methods to demonstrate whether a project's total emissions would result in a significant impact on air quality.

Table 5.3-4. San Diego Air Pollution Control District Air Quality Significance Thresholds

Construction Emissions			
Pollutant	Total Emissions (Pounds per Day)		
PM10	100		
PM2.5	55		
NO _x	250		
SO _x	250		
CO	550		
ROG	75 ¹		
Operational Emissions			
Pollutant	Total Emissions		
	Pounds per Hour	Pounds per Day	Tons per Year
PM10	—	100	15
PM2.5	—	55	10
NO _x	25	250	40
SO _x	25	250	40
CO	100	550	100
Lead and Lead Compounds	—	3.2	0.6
ROG	—	75 ¹	13.7 ²

Sources: City of San Diego 2016; San Diego Air Pollution Control District 1995, 1998

¹ SDAPCD air quality impact analysis does not include Trigger Levels for VOCs/ROGs. The County recommends using thresholds established by the South Coast Air Quality Management District (SCAQMD) while the City's recommendation is to use thresholds recommended by SCAQMD and Monterey Bay Unified Air Pollution Control District, which has similar federal and state attainment status as San Diego. Note that the recommended 137 pounds per day threshold is based on SCAQMD's recommendation in 2001, which has since changed. Therefore, because the County's recommended threshold of 75 pounds per day is lower than the City's recommended threshold of 137 pounds per day, the County's recommendation is used herein.

² 13.7 tons per year threshold is based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

The thresholds listed in Table 5.3-4 represent screening-level thresholds that can be used to evaluate whether project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. In the event that emissions exceed these thresholds, modeling would be required to demonstrate that the proposed project's total air quality impacts result in ground-level concentrations that are below the CAAQS and NAAQS, including appropriate background levels.

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

City of San Diego

To determine the significance of the proposed project's emissions, the City's Significance Determination Thresholds (2016) were utilized. With respect to air quality, this guidance recommends the use of the thresholds shown in Table 5.3-4 to determine significance.

The air quality section of the Significance Determination Thresholds guidance recognizes attainment status designations for the SDAB and its nonattainment status for both O₃ and PM. As such, the document recognizes that all new projects should include measures, pursuant to CEQA, to reduce project-related O₃ and PM emissions to ensure new development does not contribute to San Diego's nonattainment status for these pollutants.

In addition to threshold determination protocol for air quality (and protocol for all environmental resource areas analyzed under CEQA), the determination guidance includes a discussion of CO "hotspot" screening for consideration of CO during environmental review of proposed projects.

5.3.4 Impact Analysis

Issue 1: Air Quality Plan Conformance

Would the proposed project conflict with or obstruct the implementation of an applicable air quality plan?

5.3.4.1 Impact Discussion

SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The RAQS was initially adopted in 1991 and is updated on a triennial basis (most recently in 2009). The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O₃. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions and information regarding projected growth in San Diego County and the cities in the county, to project future emissions and determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by San Diego County and the cities in the county as part of the development of their general plans.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project could conflict with the RAQS and may contribute to a potentially significant cumulative impact on air quality. There are four zoning designations that apply to the project site, as currently zoned by the City's Municipal Code: RS-1-7, which is for single-family residential use (minimum of 5,000-square-foot lots); RM-2-4, which is for medium-density multiple dwelling units (one dwelling unit for each 1,750 square feet of lot area); RM-3-8, which is for medium-density multiple dwelling units (maximum of one dwelling unit for each 1,000 square feet of lot area); and OP-2-1, which is for open space park uses including passive and some active uses (San Diego Municipal Code, Chapter 13). The proposed project would not conflict with these zoning designations, as it would establish right-of-way for the roadway within these designations, and would not preclude any land from being developed consistent with these designations.

In addition, the proposed project would consist of a Community Plan Amendment to include a street connection. The proposed project would not include trip-generating uses (e.g., residential or

commercial units) and its future implementation would reduce vehicle miles traveled (VMT), as compared to existing traffic conditions (Appendix H). Therefore, it is reasonable to assume vehicle trip generation and roadway construction for the site has been anticipated in the RAQS.

5.3.4.2 Significance of Impact

The proposed project would be consistent with the local general plan and SANDAG's growth projections. As such, the proposed project would be consistent with the underlying growth forecasts in the RAQS. Impacts would be less than significant.

5.3.4.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.3.5 Impact Analysis

Issue 2: Air Quality Standards

Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

5.3.5.1 Impact Discussion

Construction

The construction activities associated with the future road would be a source of dust and exhaust emissions that could temporarily affect local air quality. Such emissions would result from earthmoving and use of heavy equipment, as well as land clearing, ground excavation, cut-and-fill operations, and roadway construction. Emissions can vary substantially from day to day, depending on the level of activity, the specific operations, and the prevailing weather.

Construction emissions of ROG, NO_x, CO, PM₁₀, PM_{2.5}, and SO_x were estimated using the Sacramento Metropolitan Air Quality Management District's Road Construction Emissions Model (RCEM) (Version 8.1.0, 2016).² The RCEM is a public-domain spreadsheet model formatted as a series of individual worksheets available to estimate construction-related emissions for roadway projects. The model enables users to estimate emissions using a minimum amount of project-specific information. The model estimates emissions for load hauling (on-road, heavy-duty vehicle trips), worker commute trips, construction site fugitive dust (PM₁₀ and PM_{2.5}), and off-road construction vehicles.

The following project-specific assumptions were used for the construction calculations.

- A 2017 start date
- A 9-month construction period
- A 0.09-mile corridor length
- A 2.0516-acre project area

² The Sacramento Metropolitan Air Quality Management District develops and maintains the RCEM, but the emission factors and analysis procedures are applicable to projects throughout the state.

- A maximum of 0.51 acre of land disturbed per day
- A total of 43,500 cubic yards of fill material
- Water trucks used as control measure for fugitive dust

The above assumptions were used as input parameters to the RCEM, which estimates construction equipment based on project size, duration of construction activities, and level of daily construction activities. While exhaust emissions are estimated for each activity, fugitive dust estimates are currently limited to major dust-generating activities, which include grubbing/land clearing and grading.

Table 5.3-5 summarizes the estimated daily emissions levels for each phase of construction, which are (1) grubbing/land clearing; (2) grading; (3) drainage/utilities/sub-grade; and (4) paving. Although unlikely, construction activities during each phase may occur concurrently. Accordingly, maximum daily emissions were estimated assuming all equipment would operate concurrently.

Table 5.3-5. Estimated Project Construction Emissions (pounds per day)

Phase	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Grubbing/land clearing	1	24	9	6	2	<1
Grading	7	52	52	9	5	<1
Drainage/utilities/sub-grade	6	45	45	9	4	<1
Paving	2	18	18	2	1	<1
<i>Maximum daily¹</i>	<i>16</i>	<i>139</i>	<i>124</i>	<i>26</i>	<i>12</i>	<i><1</i>
Threshold	75	250	550	100	55	250

Source: Sacramento Metropolitan Air Quality Management District 2016

¹ Worst-case, conservative scenario that assumes construction of all four phases would occur concurrently.

As shown in Table 5.3-5, construction emissions under a worst-case maximum daily emissions that conservatively assumes concurrent construction of all phases would not exceed the City's thresholds of significance. Impacts associated with construction emissions would be less than significant.

Operation

The operational emissions associated with the proposed project would result from the redistribution of traffic, which has the potential to change regional and study area VMT and associated emissions from vehicles due to the implementation of the proposed project. In order to determine significance of the impacts associated with implementation of the proposed project, emissions were modeled based on a VMT analysis as modeled by SANDAG (Appendix H) and emission factors from CARB's on-road mobile source emission factors (EMFAC) model (Appendix D). The magnitude of operational criteria air pollutant emissions from mobile sources is directly correlated to net change in local and regional VMT. Emissions of ROG, NO_x, CO, PM₁₀, PM_{2.5}, and SO_x were modeled for three scenarios: Existing (2013), Near-Term Baseline (2017), and Long-Term Baseline (2035) year conditions.

Table 5.3-6 summarizes the modeled emissions by scenario and presents a comparison of project emissions to the existing, near-term, and future baseline conditions. The differences in emissions between the project and the baseline conditions represent emissions generated directly as a result of implementation of the project. The Near-Term (2017) and Long-Term (2035) year analyses

account for reductions in vehicular emission rates as a result of continuing improvements in engine technology and the retirement of older, higher-emitting vehicles. It should also be noted that the existing condition is provided for informational purposes only. However, as the project would not be implemented until at least the Near-Term scenario (Year 2017), the impacts of the project are derived by comparing the project scenarios with future year conditions. Please refer to Appendix H for a detailed methodology on how the VMT model was developed, including how the scenarios were selected and VMT was calculated.

Table 5.3-6. Estimated Project Operational Emissions (pounds per day)

Condition	ROG	NO_x	CO	PM₁₀	PM_{2.5}	SO_x
2013 Existing	1.22	7.74	23.56	10.60	2.80	0.06
2017 Near-Term Baseline	0.80	5.29	16.86	11.68	3.02	0.06
2017 Near-Term Baseline with Project	0.80	5.25	16.74	11.60	3.00	0.06
2035 Long-Term Baseline	0.43	1.81	8.56	13.40	3.42	0.04
2035 Long-Term Baseline with Project	0.43	1.79	8.50	13.30	3.39	0.04
Comparison to Baseline Conditions						
2017 Near-Term	-0.01	-0.04	-0.12	-0.08	-0.02	<-0.01
2035 Long-Term	<-0.01	-0.01	-0.06	-0.10	-0.03	<-0.01
Threshold	75	250	550	100	55	250

Source: California Air Resources Board EMFAC model. Totals may not add exactly due to rounding.

The emissions analysis presented in Table 5.3-6 indicates that implementation of the project would reduce criteria pollutant emissions relative to baseline conditions. This result is primarily because of changes in local and regional VMT that would occur with construction of the street connection. The proposed project would offer a more direct route and would divert traffic from other arterials in the vicinity. In addition, the roadway connection would not be substantially longer than other arterials in the area. Therefore, the proposed project would not result in an increase in VMT and corresponding emissions, and impacts would be less than significant.

5.3.5.2 Significance of Impact

Neither construction nor operation of the proposed project would exceed the City's significance thresholds for any criteria pollutant (refer to Tables 5.3-5 and 5.3-6). Therefore, impacts during future construction and operation would be less than significant.

5.3.5.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.3.6 Impact Analysis

Issue 3: Sensitive Receptors

Would the proposed project expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates?

5.3.6.1 Impact Discussion

As adopted by the South Coast Air Quality Management District in its CEQA Air Quality handbook (Chapter 4), a sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant compared to the population at large. Sensitive receptors (and the facilities that house them) in proximity to localized CO sources or TACs are of particular concern. Examples include:

- Long-term health care facilities
- Rehabilitation centers
- Convalescent centers
- Retirement homes
- Residences, such as medical patients in homes
- Schools
- Playgrounds
- Child care centers
- Athletic facilities

Toxic Air Contaminants

In addition to impacts from criteria pollutants, proposed project impacts may include emissions of pollutants identified by the state and federal government as TACs or hazardous air pollutants. The greatest potential for TAC emissions would be during construction and would result from diesel particulate emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts on sensitive receptors. The closest sensitive receptors are City View Church and the single-family residential development to the north of Phyllis Place approximately 330 feet from the project site, residential units associated with the Quarry Falls project approximately 300 feet from the project site, and single-family residential development to the west approximately 760 feet from the project site. It should be noted that planned residential development within Quarry Falls would be located approximately 125 feet west of the roadway once constructed.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. SDAPCD Rule 1210 (San Diego Air Pollution Control District 1996) indicates that an incremental cancer risk threshold of 10 in 1 million or greater warrants public notification. "Incremental cancer risk" is the likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 70-year lifetime will contract cancer quantified using standard risk-assessment methodology. Implementation of the project would result in the building of the roadway segment. Future construction would total approximately 9 months. Off-road diesel construction equipment and heavy-duty diesel trucks (e.g., concrete trucks and delivery trucks), which are sources of diesel

exhaust PM, are regulated under three Airborne Toxic Control Measures (ATCMs) adopted by CARB. The ATCM for diesel construction equipment specifies PM emission standards for equipment fleets, which become increasingly stringent over time.

Furthermore, most newly purchased construction equipment introduced into construction fleets after 2013, depending on the engine horsepower rating, is equipped with high-efficiency diesel particulate filters. One of the ATCMs for heavy-duty diesel trucks specifies that commercial trucks with a gross vehicle weight rating over 10,000 pounds are prohibited from idling for more than 5 minutes unless the engines are idling while queuing or involved in operational activities. In addition, starting in model year 2008, new heavy-duty trucks must be equipped with an automatic shutoff device to prevent excessive idling or meet stringent NO_x requirements. Lastly, fleets of diesel trucks with a gross vehicle weight rating greater than 14,000 pounds are subject to another ATCM. This ATCM requires truck fleet operators to replace older vehicles and/or equip them with diesel particulate filters, depending on the age of the truck. Thus, the diesel exhaust PM emissions from off-road construction equipment and trucks would be controlled substantially. Accordingly, future construction in implementing the project is not anticipated to result in a long-term exposure of sensitive receptors to substantial concentration of TACs.

Future operation of a road would not result in TACs because no stationary sources are proposed and the proposed project would not result in a significant net increase in VMT. While the redistribution of vehicle trips may move traffic closer to receptors adjacent to the road connection, the diverted traffic would predominantly be passenger vehicles, which is not a significant source of diesel emissions. Therefore, impacts associated with TACs would be less than significant.

Carbon Monoxide Hotspots

Projects contributing to significant traffic impacts may result in the formation of CO hotspots. Specifically, if traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles “cold-started” and operating at pollution-inefficient speeds, and operates on roadways already crowded with non-project traffic, there is a potential for the formation of microscale CO “hotspots” in the area immediately around points of congested traffic. Because of continued improvement in mobile-source CO emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the basin is steadily decreasing (California Air Resources Board 2004).

To verify that the future implementation of the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The proposed project's traffic report (Appendix C) evaluated the level of service (LOS) (i.e., increased congestion) impacts at the intersections affected by the proposed project. The potential for CO hotspots was evaluated based on the results of the traffic report. The California Department of Transportation (Caltrans) Institute of Transportation Studies *Transportation Project-Level Carbon Monoxide Protocol* (Caltrans CO Protocol) (1997) was followed.

The City recommends that a quantitative analysis of CO hotspots be performed where roadways deteriorate to LOS D or worse and if a proposed development is within 400 feet of a sensitive receptor. The proposed project's traffic report (Appendix C) evaluated 24 key intersections, 29 roadway segments, and 3 freeway mainline segments in the vicinity of the project site to assess existing and long-term conditions. Based on the traffic study, implementation of the project would worsen LOS to D or worse at four intersections under Near-Term (2017) conditions and five intersections under Long-Term (2035) conditions (see Appendix C). Of these, all but two are within

400 feet of receptors and therefore require a quantitative CO hotspot analysis, per the Caltrans CO Protocol and City guidelines. The affected intersections are listed below.

1. Murray Ridge Road and Sandrock Avenue
2. Murray Ridge Road and Interstate 805 northbound ramp
3. Qualcomm Way and Rio San Diego Drive (Long-Term only)
4. Via Alta and Franklin Ridge Road (Long-Term only)

In accordance with the City's Significance Determination Thresholds (City of San Diego 2016), a site-specific CO hotspot analysis was performed for these intersections. The potential impact of the implementation of the project on local CO levels was assessed at these intersections using Caltrans' California LINE Source Dispersion Model (CALINE4), which allows microscale CO concentrations to be estimated along each roadway corridor or near intersections (Caltrans 1998).

The modeling analysis was performed for the worst-case wind angle, in which the model selects the wind angles that produce the highest CO concentrations at each of the receptors. The suburban land classification of 40 inches (100 centimeters) was used for the aerodynamic roughness coefficient, which determines the amount of local air turbulence that affects plume spreading. The at-grade option was used in the analysis; for at-grade sections, CALINE4 does not permit the plume to mix below ground level. The mixing zone, which is defined as the width of the roadway plus 10 feet (3 meters) on either side, was estimated for each roadway. The calculations assume a mixing height of 3,280 feet (1,000 meters), a flat topographical condition between the source and the receptor (link height of 0 meters), and a meteorological condition of little to almost no wind (3.3 feet [1 meter] per second), consistent with EPA guidance.

The emission factor represents the weighted average emission rate of the local San Diego County vehicle fleet expressed in grams per mile per vehicle. Emission factors for 2017 and 2035 were based on a 5-mile-per-hour (mph) average speed for all of the intersections, a temperature of 47°F,³ and an average humidity of 55%. The hourly traffic volume anticipated to travel on each link, in units of vehicles per hour, was based on the traffic report. Because future construction of the roadway-generated traffic would have a direct impact for all of the intersections in the PM peak hours, vehicle counts for the PM hours were used.

Four receptor locations at each intersection were modeled to determine CO ambient concentrations. A receptor was assumed on the sidewalk at each corner of the modeled intersections, for a total of four receptors adjacent to the intersection, to represent the possibility of extended outdoor exposure. CO concentrations were modeled at these locations to assess the maximum potential CO exposure that could occur in the long term. Impacts on additional nearby sensitive receptors, such as residences or schools, were modeled. A receptor height of 5.9 feet (1.8 meters) was used in accordance with EPA recommendations for all receptor locations.

³ Historically, January is the coldest month of the year in San Diego, with an average minimum temperature of 49.7°F (National Oceanic Atmospheric Administration 2017). The Caltrans CO Protocol guidance is to use the smallest mean minimum temperature observed in January over the past 3 years plus the temperature adjustment for the geographic location and time period. The smallest mean minimum at the San Diego WSO airport station was 47°F in January 2013 (Western Regional Climate Center 2017). Assuming a 5°F correction factor for p.m. traffic conditions, average evening temperature would be approximately 52°F (Caltrans 1997). However, because these meteorological readings are for Lindbergh Field in San Diego, and as CO concentrations generally increase with a decrease in temperature, a temperature of 47°F (8.3°C) was conservatively used to determine the emission factors in EMFAC and CO concentrations in CALINE4.

Average 8-hour and 1-hour CO background concentrations of 2.0 and 2.7 ppm, respectively, as measured between 2013 and 2015, was assumed in the CALINE4 model. The model provides predicted concentrations in ppm at each of the receptor locations. To estimate an 8-hour average CO concentration, a persistence factor of 0.7, as is recommended for urban locations, was applied to the output values.

The results of the model are shown in Table 5.3-7. Model input and output data are provided in Appendix D.

Table 5.3-7. CALINE4 Predicted Carbon Monoxide Concentrations

Intersection	Maximum Modeled Impact with Roadway Connection Conditions (ppm)*			
	Near-Term (2017)		Long-Term (2035)	
	1-hour	8-hour**	1-hour	8-hour**
Murray Ridge Road and Sandroek Road	3.7	2.7	3.1	2.2
Murray Ridge Road and I-805 Northbound Ramp	4.2	3.0	3.2	2.3
Qualcomm Way and Rio San Diego Drive	NM	NM	3.2	2.3
Via Alta and Franklin Ridge Road	NM	NM	3.3	2.4
Threshold	20 ppm	9 ppm	20 ppm	9 ppm

Source: Caltrans 1998 (CALINE4).

Notes: NM = not modeled (analysis only required under Long-Term conditions).

*Modeled concentrations reflect background 1-hour concentration of 2.7 ppm and an 8-hour concentration of 2.0 ppm.

**8-hour concentrations were obtained by multiplying the 1-hour concentration by a factor of 0.7, as referenced in Caltrans 1997, Table B.15.

Note that numbers are not additive.

As shown in Table 5.3-7, the maximum CO concentration predicted for the 1-hour averaging period would be 4.2 ppm, which is below the state 1-hour CO standard of 20 ppm (see Table 5.3-3 for state standards). The maximum predicted 8-hour CO concentration of 3.0 ppm would be below the state CO standard of 9 ppm. Neither the 1-hour nor 8-hour state standard would be equaled or exceeded at any of the intersections studied.

5.3.6.2 Significance of Impact

The proposed project would not expose sensitive receptors to substantial pollutant concentrations; therefore, impacts would be less than significant.

5.3.6.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.3.7 Impact Analysis

Issue 4: Dust

Would the proposed project exceed 100 pounds per day of PM10 dust?

5.3.7.1 Impact Discussion

As previously shown in Table 5.3-5, the proposed project would emit a maximum of 26 pounds per day of PM10 during the construction phase, which is below the established threshold of 100 pounds per day. As previously shown in Table 5.3-6, the proposed project would reduce PM10 emissions during the operation phase when compared to Near-Term without project conditions (11.60 pounds per day in the Year 2017 Near-Term with project condition) due to the reductions in regional and study area VMT. Therefore, impacts would be less than significant.

5.3.7.2 Significance of Impact

The proposed project would not exceed the PM10 daily threshold of 100 pounds per day during either the construction or operation phases; therefore, impacts would be less than significant.

5.3.7.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.3.8 Impact Analysis

Issue 5: Odors

Would the proposed project create objectionable odors affecting a substantial number of people?

5.3.8.1 Impact Discussion

Minor sources of odors would be present during construction of the proposed project. Diesel engines are the predominant source of power for construction equipment. Exhaust odors from diesel engines, as well as emissions associated with asphalt paving, may be considered offensive to some individuals. As discussed under Section 5.3.6, the closest sensitive receptors are City View Church and the single-family residential development to the north of Phyllis Place approximately 330 feet from the project site. Additional residential receptors within 1,000 feet of the project are located to the west and associated with the Quarry Falls project. While these receptors may be able to detect construction-related odors such as emissions from paving and related equipment intermittently, these odors would be temporary and would disperse rapidly with distance from the source. All potential construction-related odors would cease when equipment is not in operation, and would end once construction is complete (approximately 9 months). Consequently, the occasional noticeability of construction odors would not be considered a significant impact on the environment.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would result in a roadway connection and would not result in uses that are associated with odors.

5.3.8.2 Significance of Impact

While construction of the project would result in minor odors from engine exhaust and asphalt paving, these odors would be temporary and dissipate as a function of distance. Operation of the project would not result in uses that are associated with odors. Accordingly, odor impacts would be less than significant.

5.3.8.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.3.9 Impact Analysis

Issue 6: Stationary Sources

Would the proposed project release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located?

This threshold requires CEQA to analyze size of whether a project would “release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located.”

This threshold is based on San Diego Municipal Code, Chapter 14, Article 2, Division 7, Off-Site Development Impact Regulations, paragraph 142.0710, Air Contaminant Regulations, which states:

Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and PM, 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.

5.3.9.1 Impact Discussion

Stationary sources that emit air contaminants typically include uses such as dry cleaners, gas stations, combustion sources, and laboratories. The proposed project consists of the construction and operation of a roadway and an amendment to the Serra Mesa Community Plan. No stationary sources are proposed or would be in operation as a result of the proposed project.

5.3.9.2 Significance of Impact

The proposed project would not release substantial quantities of air contaminants beyond the boundaries of the project site because of the operation of a stationary source; therefore, impacts would be less than significant.

5.3.9.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.4 Noise

This section describes the existing conditions and applicable laws and regulations for noise and vibration, and analyzes the potential construction and operational noise impacts associated with the future implementation of the proposed project. The analysis in this section is based largely on the *Noise Technical Report* prepared by Dudek in April 2015 for the proposed project. The full report is included as Appendix E-1 of this DEIR. The traffic noise modeling presented in the *Noise Technical Report* has also been updated as necessary to respond to various comments received during the public review period for the DEIR. The updated traffic noise modeling is provided as Appendix E-2 of this EIR. Additional construction noise and vibration analyses have also been conducted as part of this DEIR. Noise impacts are determined based on the City's Significance Determination Thresholds (2016). Potential impacts for which the City does not have specific significance thresholds (such as groundborne vibration) are assessed based on commonly accepted thresholds developed by other agencies.

5.4.1 Existing Conditions

5.4.1.1 Noise Fundamentals and Terminology

Noise is commonly defined as unwanted sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is often defined as sound that is objectionable because it is disturbing or annoying.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors, which affect the propagation path to the receptor, determine the sound level and the characteristics of the noise perceived by the receptor.

The following provides an explanation of key concepts and acoustical terms used in the analysis of environmental and community noise.

Frequency, Amplitude, and Decibels

Continuous sound can be described by *frequency* (pitch) and *amplitude* (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz (kHz), or thousands of Hz. The audible frequency range for humans is generally between 20 and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. The amplitude of a sound is typically described in terms of *sound pressure level* (SPL), which refers to the root-mean-square (rms) pressure of a sound wave and can be measured in units called microPascals (μPa). One μPa is approximately one hundred-billionth (0.0000000001) of normal atmospheric pressure. Sound pressure levels for different kinds of noise environments can range from less than 100 to over 100,000,000 μPa. Because of this large range of values, sound is rarely

expressed in terms of μPa . Instead, a logarithmic scale is used to describe the sound pressure level (also referred to simply as the sound level) in terms of decibels, abbreviated dB.

Specifically, the decibel describes the ratio of the actual sound pressure to a reference pressure and is calculated as follows.

$$SPL = 20 \times \log_{10} \left(\frac{X}{20 \mu Pa} \right)$$

where X is the actual sound pressure and $20 \mu\text{Pa}$ is the standard reference pressure level for acoustical measurements in air.

The threshold of hearing for young people is about 0 dB, which corresponds to $20 \mu\text{Pa}$.

Decibel Addition

Because decibels are logarithmic units, sound pressure levels cannot be added or subtracted through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3-dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one excavator produces a sound pressure level of 80 dB, two excavators would not produce 160 dB. Rather, they would combine to produce 83 dB. The cumulative sound level of any number of sources, such as excavators, can be determined using decibel addition. The same decibel addition is used for A-weighted decibels described below.

Perception of Noise and A-Weighting

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound pressure level in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude in higher or lower frequencies. To approximate the response of the human ear, sound levels in various frequency bands are adjusted (or “weighted”), depending on human sensitivity to those frequencies. The resulting sound pressure level is expressed in A-weighted decibels, abbreviated dBA. When people make judgments regarding the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted sound levels of those sounds. Table 5.4-1 describes typical A-weighted sound levels for various noise sources.

Human Response to Noise

Noise-sensitive receptors (also called “receivers”) are locations where people reside or where the presence of unwanted sound may adversely affect the use of the land. Noise-sensitive receptors typically include residences, hospitals, schools, guest lodging, libraries, and certain types of passive recreational uses.

The effects of noise on people can be listed in three general categories.

- Subjective effects of annoyance, nuisance, dissatisfaction.
- Interference with activities such as speech, sleep, learning, or working.
- Physiological effects such as startling and hearing loss.

Table 5.4-1. Typical Noise Levels in the Environment

Common Outdoor Noise Source	Sound Level (dBA)	Common Indoor Noise Source
	— 110 —	Rock band
Jet flying at 1,000 feet		
	— 100 —	
Gas lawn mower at 3 feet		
	— 90 —	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	— 80 —	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower at 100 feet	— 70 —	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	— 60 —	
		Large business office
Quiet urban daytime	— 50 —	Dishwasher in next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime		
	— 30 —	Library
Quiet rural nighttime		Bedroom at night
	— 20 —	
		Broadcast/recording studio
	— 10 —	
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Source: California Department of Transportation 2013a

In most cases, effects from sounds typically found in the natural environment (compared to an industrial or an occupational setting) would be limited to the first two categories: creating an annoyance or interference with activities. No completely satisfactory method exists to measure the subjective effects of sound or the corresponding reactions of annoyance and dissatisfaction. This lack of a common standard arises primarily from the wide variation in individual thresholds of annoyance and habituation to sound. Therefore, an important way of determining a person's subjective reaction to a new sound is by comparing it to the existing baseline or "ambient" environment to which that person has adapted. In general, the more the level or tonal (frequency) variations of a sound exceed the previously existing ambient sound level or tonal quality, the less acceptable the new sound will be, as judged by the exposed individual.

Studies have shown that under controlled conditions in an acoustics laboratory, a healthy human ear is able to discern changes in sound levels of one dBA. In the normal environment, the healthy human ear can detect changes of about two dBA; however, it is widely accepted that changes of three dBA in the normal environment are considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud. Accordingly, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) resulting in a 3-dB increase in sound would generally be barely detectable.

Equipment and vehicle operation during nighttime hours can potentially result in noise events that disturb the sleep of people living in nearby residential areas. Interior noise levels between 50 and 55 dBA L_{\max} (maximum sound level) during nighttime hours (10 p.m. to 7 a.m.) were found to result in sleep disturbance and annoyance (Nelson 1987).

5.4.1.2 Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors or noise “metrics” have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. The most common of these metrics are described below.

Equivalent Sound Level

The equivalent sound level (L_{eq}) is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off, or construction work, which can vary sporadically. The L_{eq} describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the L_{eq} will vary depending on the time of day—a prime example is traffic noise, which rises and falls depending on the amount of traffic on a given street or freeway.

Maximum Sound Level and Minimum Sound Level

L_{\max} and L_{\min} refer to the maximum and minimum sound levels, respectively, that occur during the noise measurement period. More specifically, they describe the rms sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.

Community Noise Equivalent Level

A given level of noise may be more or less tolerable depending on the duration of the exposure experienced by an individual, as well as the time of day during which the noise occurs. The community noise equivalent level (CNEL) is a measure of the cumulative 24-hour noise exposure that considers not only the variation of the A-weighted noise level but also the duration and the time of day of the disturbance. The CNEL is derived from the 24 A-weighted 1-hour L_{eq} s that occur in a day, with “penalties” applied to the L_{eq} s occurring during the evening hours (7 p.m. to 10 p.m.) and nighttime hours (10 p.m. to 7 a.m.) to account for increased noise sensitivity during these hours. Specifically, the CNEL is calculated by adding 5 dBA to each of the evening L_{eq} s, adding 10 dBA to each of the nighttime L_{eq} s, and then taking the average value for all 24 hours.

Day-Night Sound Level

Much like CNEL, above, the day-night sound level (L_{dn}) is also a measure of the cumulative 24-hour noise exposure that considers not only the variation of the A-weighted noise level but also the duration and the time of day of the disturbance. The L_{dn} is derived in exactly the same way as CNEL, except that no penalty is applied to the evening hours of 7 p.m. to 10 p.m. Specifically, the L_{dn} is calculated from the 24 A-weighted 1-hour L_{eqs} that occur in a day by adding 10 dBA to each of the nighttime (10 p.m. to 7 a.m.) L_{eqs} and then taking the average value for all 24 hours.

Various federal, state, and local agencies have adopted CNEL or L_{dn} as the measure of community noise. While not identical, CNEL and L_{dn} are normally within 1 dBA of each other when measured in typical community environments, and many noise standards/regulations use the two interchangeably.

5.4.1.3 Sound Propagation

When sound propagates over a distance, it changes in both level and frequency content. The manner in which noise is reduced with distance depends on the following important factors.

Geometric Spreading. Sound from a single source (i.e., a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. Highway noise is not a single stationary point source of sound. The movement of vehicles on a highway makes the source of the sound appear to emanate from a line (i.e., a “line” source) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The change in sound level (i.e., “attenuation”) from a line source is 3 dBA per doubling of distance.

Ground Absorption. Usually the noise path between the source and the observer is very close to the ground. The excess noise attenuation from ground absorption occurs due to acoustic energy losses on sound wave reflection. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, prediction results based on this scheme are sufficiently accurate. For acoustically “hard” sites (i.e., sites with a reflective surface, such as a parking lot or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed because the sound wave is reflected without energy losses. For acoustically absorptive or “soft” sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.

Atmospheric Effects. Research by the California Department of Transportation (Caltrans) and others has shown that atmospheric conditions can have a major effect on noise levels. Wind has been shown to be the single most important meteorological factor within approximately 500 feet, whereas vertical air temperature gradients are more important over longer distances. Other factors, such as air temperature, humidity, and turbulence, also have major effects. Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lower noise levels. Increased sound levels can also occur because of temperature inversion conditions (i.e., increasing temperature with elevation, with

cooler air near the surface, where the sound source tends to be and the warmer air above which acts as a cap, causing a reflection of ground level-generated sound).

Shielding. A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

5.4.1.4 Groundborne Vibration Fundamentals and Terminology

Groundborne vibration is an oscillatory motion of the ground with respect to the equilibrium position. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. However, when vibration occurs as a result of groundborne transmission from exterior sources it can be a nuisance for residents and tenants. Typical outdoor sources of perceptible groundborne vibration are heavy construction equipment (such as earthmoving, blasting, and pile driving), steel-wheeled trains, and heavy trucks on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

The following sections provide an explanation of key concepts and terms used in the analysis of groundborne vibration.

Displacement, Velocity, and Acceleration

Groundborne vibration can be described in terms of displacement, velocity, or acceleration. Displacement is the easiest descriptor to understand; it is simply the distance that a vibrating point moves from its static position (i.e., its resting position when the vibration is not present). The velocity describes the instantaneous speed of the movement and acceleration is the instantaneous rate of change of the speed. Although displacement is fundamentally easier to understand than velocity or acceleration, it is rarely used for describing groundborne vibration, for the following reasons: (1) human response to groundborne vibration correlates more accurately with velocity or acceleration, (2) the effect on buildings and sensitive equipment is more accurately described using velocity or acceleration, and (3) most transducers used in the measurement of groundborne vibration actually measure either velocity or acceleration. For evaluating the potential environmental impacts of groundborne vibration, velocity is the fundamental measure that is typically used.

The frequency of vibration is expressed in the same unit, Hz, as described above for noise. One Hz is equal to one cycle per second, and one kHz is equal to one thousand cycles per second. The description of the vibration amplitude depends on the metric being used, as described below under *Groundborne Vibration Descriptors*. If a person is engaged in any type of physical activity, vibration tolerance increases considerably.

Perception of Groundborne Vibration

There are three primary types of receivers that can be adversely affected by ground vibration: people, structures, and equipment.

People may perceive both primary and secondary effects of groundborne vibration. Primary effects occur when groundborne vibration is felt directly through the ground or the building structure. Secondary effects include phenomena such as the rattling of fixtures or the movement of hanging objects. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is engaged in any type of physical activity. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

Vibration generated by construction activity has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or walls, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

Groundborne Vibration Descriptors

The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak amplitude of the vibration velocity. The unit of measurement is inches per second (in/s). PPV can be used to assess both human response to groundborne vibration and the potential for building damage. PPV is related to the stresses that are experienced by buildings subjected to groundborne vibration.

The vibration velocity level (L_v) describes the rms velocity amplitude of the vibration and is typically calculated over a 1-second period. The maximum L_v describes the maximum rms velocity amplitude that occurs during a vibration measurement and is analogous to the L_{max} metric used to describe noise. L_v can be measured in inches per second but is more typically described in terms of vibration velocity level decibels (VdB). The VdB uses a logarithmic scale to describe the ratio of the actual rms velocity amplitude to a reference velocity amplitude (1×10^{-6} in/s is the accepted reference velocity amplitude in the United States). Specifically, an L_v in decibels (VdB), is calculated as follows.

$$L_v = 20 \times \log_{10} \left(\frac{V}{1 \times 10^{-6} \text{ in/s}} \right),$$

where V is the actual rms velocity amplitude and 1×10^{-6} in/s is the reference velocity amplitude.

5.4.1.5 Environmental Setting

Ambient noise within the vicinity of the project site is primarily generated by vehicle traffic along Interstate (I-) 805 and nearby arterial roadways. Section 2.0 of the proposed project's Traffic Impact Study (Appendix C) details the existing conditions of the traffic impact study area, including the average daily traffic (ADT) of roadways, intersections, and freeway segments.

Existing ambient noise levels in the vicinity of the project site were characterized by conducting measurements at five locations (M1 through M5) between 2:50 p.m. and 4:10 p.m. on February 20,

2015, as depicted in Figure 5.4-1. As shown in Table 5.4-2, the measured average noise levels (L_{eq}) ranged from 52 dBA L_{eq} at Site M2 to 62 dBA L_{eq} at Site M3. These noise levels were also used to estimate the CNEL at each location, as shown in the table.

Table 5.4-2. Measured Noise Levels and Community Noise Equivalent Level

Site	Description	L_{eq}^a (dBA)	L_{max}^b (dBA)	CNEL ^{bc} (dBA)
M1	City View Church, north of the project site	55	<u>67</u>	58
M2	Residential area on Via Alta, southwest of the project site	52	<u>64</u>	52
M3	Residential area on Civita Boulevard, southwest of the project site	62	<u>83</u>	62
M4	Future residential area adjacent to Phillis Place, west of the project site	61	<u>76</u>	63
M5	Residential area on Mission Center Road, west of the project site	56	<u>67</u>	58

^a Equivalent continuous sound level (time-average sound level).
^b Maximum sound level during measurement period.
^c CNEL based on diurnal noise patterns for roadways with greater than 10,000 average daily traffic.

5.4.1.6 Noise-Sensitive Land Uses

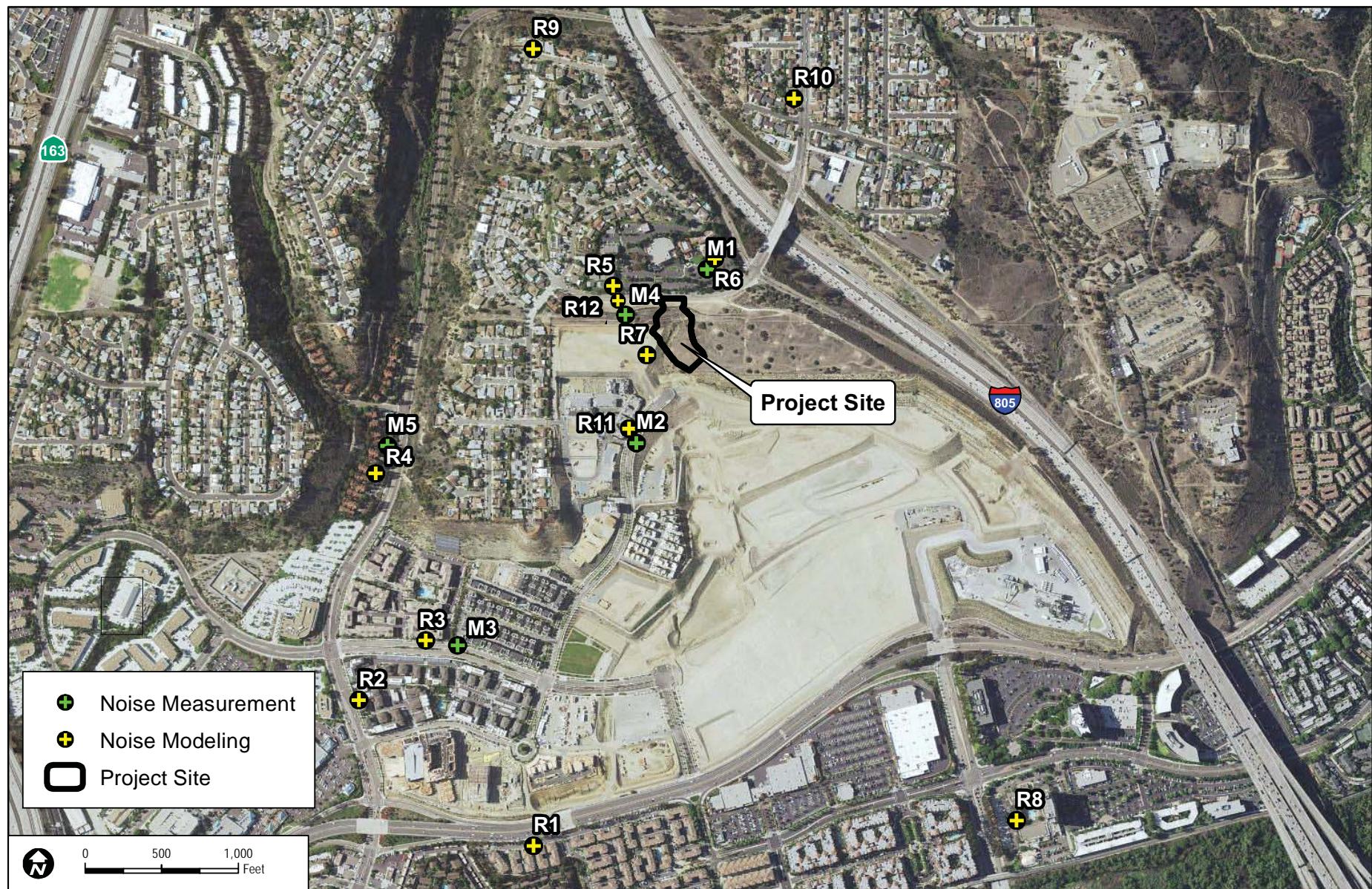
The City's Significance Determination Thresholds (2016) define noise-sensitive land uses to include, but not necessarily be limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, parks and recreation facilities, museums, and child care facilities. However, the construction noise limits in the City's municipal code only strictly apply to property zoned residential.

Noise-sensitive land uses in the vicinity of the project include existing homes to the west and southwest, and City View Church on the north side of Phyllis Place. New homes will also be constructed nearby to the east and south at some point in the future as part of the approved Quarry Falls Specific Plan. There are no schools in the immediate vicinity. The closest existing school is Elevate Elementary School, approximately 1,400 feet to the northeast, across I-805. There is also the possibility that a new school may be constructed as part of the Quarry Falls Specific Plan; the site for this school is more than 1,700 feet south of the project site.

5.4.2 Regulatory Framework

5.4.2.1 Federal

The federal government advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that "noise-sensitive" uses are prohibited from being sited adjacent to a highway or, alternately, that the developments are planned and constructed in such a manner that potential noise impacts are minimized. Federal noise and vibration policies, programs, and/or guidelines developed by the Federal Transit Administration and the Federal Highway Administration (FHWA) are used for federal projects to calculate construction noise and vibration levels and perform impact analyses.



Source: Dudek, 2015.

Figure 5.4-1
Noise Measurement and Modeling Locations

5.4.2.2 State

Title 24, California Code of Regulations

Title 24, Part 2 of the California Code of Regulations (The California Building Code) governs the interior environment of new buildings. Section 1207 provides standards for noise affecting “dwelling units and sleeping units.” The code states “Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either L_{dn} or CNEL, consistent with the noise element of the local general plan.”

Caltrans’ *Transportation and Construction Vibration Guidance Manual*

Caltrans provides widely referenced vibration guidelines in its publication, *Transportation and Construction Vibration Guidance Manual* (Caltrans 2013b). Although these guidelines do not represent strict standards that apply to the proposed project, they are useful in establishing appropriate thresholds of impact, particularly because the City of San Diego does not provide any quantitative standards for groundborne vibration levels.

The potential effects of groundborne vibration fall into two categories: building damage and annoyance of people. The potential for vibration from project construction to damage buildings represents a physical impact on the environment and such damage would be considered by the City of San Diego to be a significant impact. However, annoyance potential, while a source of possible short-term nuisance, would not be considered a physical impact on the environment. With regard to the potential for building damage from groundborne vibration, Caltrans suggests the threshold criteria shown in Table 5.4-3.

Table 5.4-3. Caltrans Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
PPV = peak particle velocity—the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second (in/sec).

5.4.2.3 Local

City of San Diego General Plan

California requires each local government entity to perform noise studies and implement a noise element as part of its general plan. The City of San Diego General Plan, Noise Element, provides

information, goals, and policies related to the noise environment within the City. General Plan Table NE-3 presents *Land Use – Noise Compatibility Guidelines* detailing the compatibility of various land uses with different noise exposures, defined using the CNEL. There are three different tiers of compatibility: (1) Compatible, (2) Conditionally Compatible, and (3) Incompatible. The purpose of these guidelines is to direct the placement of noise-sensitive developments (e.g., homes, parks, schools) and avoid locating projects in areas that have incompatible (i.e., excessive) noise levels for the project type. Because the proposed project comprises a roadway, which is not a noise-sensitive land use, these guidelines do not apply to the project. The City’s Traffic Noise Significance Thresholds (see Table 5.4-5 below) apply to the proposed project.

City of San Diego Municipal Code

Section 59.5.0401 (*Noise Ordinance*) of the City of San Diego municipal code provides quantitative noise standards to control excessive noise generated in the City. The noise ordinance limits are expressed in terms of a 1-hour L_{eq} . The allowable noise limits depend on the land use and time of day, as depicted in Table 5.4-4. It is noted that the noise ordinance applies only to stationary (non-transportation) noise sources and traffic noise levels are not subject to these noise limits.

Table 5.4-4. City of San Diego Sound Level Limits

Land Use	Time of Day	1-Hour Average Sound Level (dB)
Single-Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multifamily Residential (up to maximum density of 1/2000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All other residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Industrial or Agricultural	Anytime	75
Source: City of San Diego Municipal Code, Section 59.5.0401–59.5.0404		
Note: The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two districts.		

Section 59.5.0404 of the code regulates noise associated with construction activities. Construction is permitted between the hours of 7 a.m. and 7 p.m., Monday through Saturday, with the exception of legal holidays. Construction equipment cannot be operated so as not to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dB during the 12-hour period from 7 a.m. to 7 p.m.

Mission Valley Community Plan

The Conservation Element of the Mission Valley Community Plan (1985) discusses noise within the community. It states that the freeways crossing and extending the length of the valley contribute significantly to the noise levels there. It also states that events held in Qualcomm Stadium contribute to noise levels in the eastern section of the community. The plan states that noise impacts should be minimized and avoided by planning for the appropriate placement and intensity of land uses relative to noise sources.

Serra Mesa Community Plan

The Serra Mesa Community Plan (1977) discusses aircraft noise attributable to Montgomery Field operations, stating that aircraft frequently fly over residential areas. It intends to mitigate adverse environmental impacts of noise, crash hazards, and visual appearance affecting adjacent areas. The plan states that noise effects on nearby residential areas have been minimized through enforcement of noise regulations.

City of San Diego Significance Determination Thresholds

The City's *CEQA Significance Determination Thresholds* (also known as *Guidelines*) outline the criteria and thresholds used to determine whether project impacts are significant (City of San Diego 2016). Thresholds applicable to the project include traffic noise and construction noise. Traffic noise significance thresholds are reproduced below as Table 5.4-5. As shown, the noise level at exterior usable open space for single- and multi-family residences should not exceed 65 dBA CNEL, for churches should not exceed 70 dBA CNEL, and for commercial or retail space should not exceed 75 dBA CNEL. Table 5.4-5 further specifies that outdoor usable areas would generally indicate a significant noise impact if located closer than 50 feet from the centerline of the closest traffic lane of a street with existing or future daily traffic volumes greater than 20,000 ADT.

Table 5.4-5. Traffic Noise Significance Thresholds

Structure or Proposed Use that Would Be Affected by Traffic Noise	Interior Space (CNEL)	Exterior Usable Space^a (CNEL)	General Indication of Potential Significance
Single-Family Detached	45 dB	65 dB	Structure or outdoor usable area ^b is <50 feet from the center of the closest (outside) lane on a street with existing or future ADT >7,500
Multi-Family, Schools, Libraries, Hospitals, Day Care, Hotels, Motels, Parks, Convalescent Homes	Development Services Department ensures 45 dB pursuant to Title 24	65 dB	
Offices, Churches, Business, Professional Uses	N/A	70 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT of >20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	N/A	75 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT of >40,000

Source: City of San Diego 2016, Table K-2.

^a 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.

^b Exterior usable areas do not include residential front yards or balconies, unless the areas such as balconies are part of the required usable open space calculation for multi-family units.

Thresholds for temporary construction noise are based on the related requirements of the municipal code as discussed above. Construction activity is prohibited between the hours of 7 p.m. of any day and 7 a.m. of the following day, and on Sundays and legal holidays, except in the case of an emergency. Construction noise levels measured at or beyond the property lines of any property zoned residential cannot exceed an average sound level greater than 75 dB during the 12-hour period from 7 a.m. to 7 p.m. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified.

5.4.3 Significance Determination Thresholds

5.4.3.1 Issue Questions

Based on the City's Significance Determination Thresholds (Issues 1–4, 6) and guidance from Caltrans (Issue 5) as described under Section 5.4.2, *Regulatory Framework*, the following issues provide the basis to assess the significance of potential noise and vibration impacts resulting from the proposed project. A significant impact related to noise would occur if implementation of the project would:

1. Result in a significant increase in the existing ambient noise levels from construction that exceed the City's adopted noise ordinance;
2. Result in a significant increase in the existing ambient noise levels due to operation;

3. Expose people to current transportation noise levels that exceed standards established in the City's Significance Determination Thresholds;
4. Expose people to future transportation noise levels that exceed standards established in the City's Significance Determination Thresholds;
5. Expose people to or generate excessive groundborne vibration or groundborne noise levels; or
6. Result in a land use that is not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan.

5.4.3.2 Methodology and Assumptions

For this project, the only operational noise source of concern is traffic, and because the project is a road, which is not considered noise-sensitive, noise levels affecting the project site itself are not analyzed.

Operational (traffic) noise was analyzed at 12 noise-sensitive receptors (R1 through R12) throughout the study area as described in Appendix E (Noise Technical Report) using FHWA's Traffic Noise Model 2.5 (FHWA 2004) and data from the project traffic study (Appendix C). Existing and future traffic noise was calculated based on the number and types of vehicles on the roadway, vehicle speeds, receiver locations, and other data, ~~including noise attenuation from structures such as existing or future buildings or walls.~~

As previously detailed in Chapter 2, *Environmental Setting*, traffic counts were collected in 2011 and verified in 2013 to represent the existing conditions. However, consistent with the *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 5 Cal. 4th 439 (Neighbors) decision, the existing conditions are provided for informational purposes and are not used to determine project-related impacts. Rather, the impact analysis uses the reasonably foreseeable near-term traffic conditions modeled for the Near-Term Scenario (Year 2017) as the baseline. This is a more conservative and more accurate approach than using the existing conditions because the Near-Term Scenario takes into account projects that have been implemented since 2013. In addition, it is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented. If the existing conditions were used in place of the future near-term conditions, projects that are under construction, planned for construction, or otherwise recently operational would not be factored into the project impact analysis. Accordingly, consistent with the Neighbors decision, traffic conditions for the Near-Term Scenario are considered the near-term baseline conditions for CEQA purposes and are used as a basis for comparison of project-related traffic impacts. The majority of the noise analysis and the corresponding results is are taken directly from Appendix E (Noise Technical Report); however, some of the results have been revised as a result of updates to the analysis that were necessary to respond to various comments received during the public review period for the DEIR.

Construction noise was analyzed using data and modeling methodologies from FHWA's Roadway Construction Noise Model (FHWA 2006, 2008), which predicts average noise levels at nearby receptors by analyzing the type of equipment, the distance from source to receptor, usage factor, and the presence or absence of intervening shielding between source and receptor. This methodology calculates the composite average noise levels for multiple equipment items scheduled during each construction phase. The phasing and construction equipment schedule used in the analysis was based on the same construction assumptions used throughout this DEIR (see

Chapter 3, *Project Description*). The noise levels for each phase were based on the three loudest pieces of equipment expected to be used during that phase.

Because the City has not established specific groundborne noise and vibration standards, construction-related vibration was analyzed using data and modeling methodologies provided by Caltrans' *Transportation and Construction Vibration Guidance Manual* (Caltrans 2013b). This manual provides typical vibration source levels for various types of construction equipment, as well as methods for estimating the propagation of groundborne vibration over distance.

5.4.4 Impact Analysis

Issue 1: Construction Noise Levels

Would the proposed project result in a significant increase in the existing ambient noise levels from construction that exceed the City's adopted noise ordinance?

5.4.4.1 Impact Discussion

Impacts are assessed based on the City's Significance Determination Thresholds (2016). Referring to these thresholds, temporary construction noise that exceeds 75 dBA L_{eq} during the 12-hour period from 7:00 a.m. to 7:00 p.m. at a sensitive receptor would be considered significant. Consistent with the City's noise ordinance, 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, with the exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator, in conformance with San Diego Municipal Code Section 59.5.0404.

Implementation of the proposed project would result in the construction of a roadway, which is expected to occur during the City's permitted daytime hours. However, if nighttime construction were to occur, it could result in potentially significant impacts. Significant impacts would also occur if the 12-hour average noise level (L_{eq}) between the hours of 7 a.m. and 7 p.m. Monday through Saturday was to exceed 75 dBA. The noise contour distances for the 75 dBA threshold were estimated for each phase of construction and are summarized in Table 5.4-6. The table presents noise levels for each phase at a standard reference distance of 50 feet as well as the distance required in order to reduce noise levels to 75 dBA or less.

Table 5.4-6. Estimated Construction Noise Impact Distances by Phase

Phase/Description	12-Hour L_{eq} at 50 feet (dBA)	Distance Required to Reduce 12-Hour L_{eq} to 75 dBA (feet)
Phase 1 – Grubbing/Land Clearing	80	85
Phase 2 – Grading/Excavation	83	125
Phase 3 – Drainage/Utilities/Subgrade	83	120
Phase 4 – Paving	77	65

Based on the calculated impact distances, noise levels may exceed 75 dBA at the parking lot of City View Church, but would be less than 75 dBA at church buildings and outdoor noise-sensitive

locations (seating areas, playgrounds, etc.); therefore, the impact would be less than significant. There are no existing schools within 125 feet of the project site, and the potential school site that is indicated in the Quarry Falls Specific Plan is more than 1,700 feet south of the project site; therefore, impacts at schools would also be less than significant.

Development of residential land uses surrounding the project site is currently underway in accordance with the Quarry Falls Specific Plan. This includes homes located within 125 feet of the project. Assuming these homes will be completed and occupied by the time the project is under construction then noise impacts would be potentially significant (**Impact NOI-1**).

5.4.4.2 Significance of Impacts

Noise from project construction activities would be temporary and would cease at the completion of construction. However, significant impacts could result if construction occurs outside of the hours permitted by the City's Noise Ordinance or at any time within 65 to 125 feet (depending on the phase of construction) of occupied residences. Therefore, impacts associated with construction noise on future occupied residences would be potentially significant and mitigation is required (**Impact NOI-1**).

5.4.4.3 Mitigation Measures

MM NOI-1

- All construction and general maintenance activities, except in an emergency, shall be limited to the days and hours permitted in Section 59.5.0404 of the City of San Diego Municipal Code. Outside of these hours, construction personnel shall not be permitted on the job site, and material or equipment deliveries and collections shall not be permitted. The construction contractor shall develop and implement a noise control plan that demonstrates to the City's satisfaction that the Noise Ordinance standard would not be exceeded. The plan may include the following.
 - All construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification.
 - All mobile or fixed construction equipment used on the project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of project activity.
 - All construction equipment shall be properly maintained.
 - All construction equipment shall be operated only when necessary and shall be switched off when not in use.
 - Construction employees shall be trained in the proper operation and use of the equipment.
 - Electrical power from the local power grid (as opposed to onsite generators) shall be used to the maximum extent feasible to run compressors, power tools, and similar equipment.

- Stationary equipment, such as generators or compressors, shall be located as far as feasible from noise-sensitive receptors.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
- Construction site speed limits shall be established and enforced during the construction period.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Temporary construction noise barriers shall be installed as necessary to adequately control noise levels. Barriers may be constructed around specific equipment items or larger work areas as required. Barriers shall be constructed of materials with a minimum sound transmission class (STC) rating of 25 (sound absorptive acoustical panels, acoustical blankets, etc.).
- The project developer and/or its contractor shall prominently post signage at the north and south ends of the project site in a highly visible location, not less than 72 hours prior to the start of any construction activity using heavy construction equipment (e.g., graders, dozer, backhoes). These two signs shall provide the project name, indicate the anticipated dates of construction, and advise that there will be loud noise associated with some construction activities. The signage shall provide a telephone contact number for affected parties to ask questions and/or relay concerns. This signage shall either consist of stand-alone signs or be combined with any other project-related signage at the project boundary, but shall be clearly visible from outside the project site. The project developer shall include this measure in the construction specification documents for the project. Prior to the commencement of heavy construction activities, the project developer and/or its contractor shall submit documentation (including photographs) to the City demonstrating compliance with this measure.

5.4.4.4 Significance after Mitigation

Noise from project construction activities would be temporary and would cease at the completion of the project. With implementation of mitigation measure **MM NOI-1**, impacts associated with construction noise at future occupied residences (**Impact NOI-1**) would be less than significant.

5.4.5 Impact Analysis

Issues 2 and 3: Operational (Traffic) Noise Levels

Would the project (2) result in a significant increase in the existing ambient noise levels due to operation or (3) expose people to current transportation noise levels that exceed standards established in the City's Significance Determination Thresholds?

5.4.5.1 Impact Discussion

Vehicles using the roadway would create operational noise. ~~Noise from motor vehicle traffic associated with the project was analyzed using FHWA Traffic Noise Model 2.5 (as discussed under Section 5.4.3.1, Methods and Assumptions) and data from the project traffic study (Appendix C). As~~

previously detailed in Chapter 2, *Environmental Setting*, traffic counts were collected in 2011 and verified in 2013 to represent the existing conditions. However, consistent with the *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 5 Cal. 4th 439 (Neighbors) decision, the existing conditions are provided for informational purposes and are not used to determine project-related impacts. Rather, the impact analysis uses the reasonably foreseeable near-term traffic conditions modeled for the Near-Term Scenario (Year 2017) as the baseline. This is a more conservative and more accurate approach than using the existing conditions because the Near-Term Scenario takes into account projects that have been implemented since 2013. In addition, it is possible the project would not be built for some time and by using near-term conditions rather than existing conditions, the analysis better predicts what the conditions would be like into the future at a point when the project may be implemented. If the existing conditions were used in place of the future near-term conditions, projects that are under construction, planned for construction, or otherwise recently operational would not be factored into the project impact analysis. Accordingly, consistent with the Neighbors decision, traffic conditions for the Near-Term Scenario are considered the near-term baseline conditions for CEQA purposes and are used as a basis for comparison of project-related traffic impacts.

Referring to the City's Significance Determination Thresholds, the noise level at exterior usable open space for single- and multi-family residences, as well as at parks, should not exceed 65 dBA CNEL, for churches should not exceed 70 dBA CNEL, and for commercial or retail space should not exceed 75 dBA CNEL. 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 (refer to Table 5.4-5 for additional details). Table 5.4-7 summarizes predicted traffic noise levels along roadways in the project vicinity under the Near-Term scenario.

As shown in the table, traffic noise levels for the Near-Term scenario (2017) are estimated to range from approximately 56 to 70-69 dB CNEL under the baseline condition, and from 58 to 69 dB CNEL with the addition of the project. The change in noise levels due to the project would range from -3.4 dB (a 3.4 dB decrease) to +3.9 dB (a 3.9 dB increase). For all receivers except R11, noise levels would increase by less than 3 dB. At R11 (representing residential land uses adjacent to Via Alta), the estimated traffic noise level would increase 3.9 dB from 56.557 dB CNEL to 60.4 60 dB CNEL in the near term as a result of the project. Because the resulting noise level would be less than the exterior residential threshold of 65 dB CNEL, the impact at R11 would be less than significant.

As shown in Table 5.4-7, the project, if implemented, is estimated to result in one nominal exceedance of the City of San Diego's 65 dB CNEL exterior noise standard for residential land uses. This would occur -{at R8, adjacent to Qualcomm Way south of Friars Road, where noise levels would increase from 65.3 dB CNEL (which is at the threshold of 65 dB CNEL when rounded to the nearest whole number) to 66-65.7 dB CNEL (which exceeds the threshold when rounded to the nearest whole number) as a result of the project}. However, but the associated increase of 0.4 dB would be imperceptible and well below the threshold of less than 3 dB described in Table 5.4-5. The project would not result in an exceedance of the City of San Diego's exterior noise standards of 65 dBA CNEL for parks, or 70 dB CNEL for churches. Therefore, project-generated traffic noise impacts would be less than significant.

Table 5.4-7. Near-Term (Year 2017) Traffic Noise Model Results (dBA CNEL)

Receiver # – Location	Existing	Near-Term Baseline	Near-Term with Project	Near-Term Change due to Project
R1 – Residential adjacent to Friars Road	63	65	64	-1
R2 – Residential adjacent to Mission Center Road north of Friars Road	69	70	69	-1
R3 – Residential adjacent to Civita Boulevard	58	61	59	-2
R4 – Residential adjacent to Mission Center Road north of Civita Boulevard	61	64	61	-3
R5 – Residential adjacent to Phyllis Place	59	59	60	+1
R6 – Church adjacent to Phyllis Place	62	62	62	0
R7 – Future residential west of Franklin Ridge Road Extension	54	56	58	+2
R8 – Residential adjacent to Qualcomm Way	64	65	66	+1
R9 – Residential adjacent to Mission Center Road north of project	69	69	69	0
R10 – Residential adjacent to Phyllis Place east of Interstate 805	68	69	68	-1
R11 – Residential adjacent to Via Alta	60	57	60	+3
Receiver # – Location	<u>Near-Term Baseline</u>	<u>Near-Term with Project</u>	<u>Near-Term Change due to Project</u>	<u>Effective Noise Level of Project Alone*</u>
<u>R1 – Residential adjacent to Friars Road</u>	<u>64.6</u>	<u>63.9</u>	<u>-0.7</u>	<u>-56.3</u>
<u>R2 – Residential adjacent to Mission Center Road north of Friars Road</u>	<u>68.4</u>	<u>67.5</u>	<u>-0.9</u>	<u>-61.1</u>
<u>R3 – Residential adjacent to Civita Boulevard</u>	<u>60.4</u>	<u>58.7</u>	<u>-1.7</u>	<u>-55.5</u>
<u>R4 – Residential adjacent to Mission Center Road north of Civita Boulevard</u>	<u>64.3</u>	<u>60.9</u>	<u>-3.4</u>	<u>-61.6</u>
<u>R5 – Residential adjacent to Phyllis Place</u>	<u>59.2</u>	<u>59.6</u>	<u>0.4</u>	<u>49.0</u>
<u>R6 – Church adjacent to Phyllis Place</u>	<u>61.7</u>	<u>62.1</u>	<u>0.4</u>	<u>51.5</u>
<u>R7 – Future residential west of Franklin Ridge Road Extension</u>	<u>56.3</u>	<u>58.4</u>	<u>2.1</u>	<u>54.2</u>
<u>R8 – Residential adjacent to Qualcomm Way</u>	<u>65.3</u>	<u>65.7</u>	<u>0.4</u>	<u>55.1</u>
<u>R9 – Residential adjacent to Mission Center Road north of project</u>	<u>69.4</u>	<u>69.1</u>	<u>-0.3</u>	<u>-57.6</u>
<u>R10 – Residential adjacent to Phyllis Place east of Interstate 805</u>	<u>68.5</u>	<u>67.6</u>	<u>-0.9</u>	<u>-61.2</u>
<u>R11 – Residential adjacent to Via Alta</u>	<u>56.5</u>	<u>60.4</u>	<u>3.9</u>	<u>58.1</u>

Receiver # – Location	Existing	Near-Term Baseline	Near-Term with Project	Near-Term Change due to Project
R12 - Phyllis Place Park	59.4	60.6	1.2	54.4
* Included for informational purposes only, the values in this column seek to represent the changes in traffic noise levels at each receptor as a single equivalent noise level. Positive values are assigned where the project causes overall noise increases; these values represent the effective traffic noise level attributable to all project changes. Negative values are assigned where the project causes overall noise decreases; these values represent the effective noise level contribution that would need to be removed from the total "Near-Term Baseline" noise level in order to obtain the "Near-Term with Project" noise level.				

5.4.5.2 Significance of Impacts

Operational (traffic-related) noise impacts would be less than significant.

5.4.5.3 Mitigation Measures

Impacts would be less than significant. Therefore, no mitigation measures would be required.

5.4.6 Impact Analysis

Issue 4: Future Traffic Noise Levels

Would the proposed project expose people to future transportation noise levels that exceed standards established in the City's Significance Determination Thresholds?

5.4.6.2 Impact Discussion

As previously detailed, the project traffic study (Appendix C) analyzed the change in traffic patterns for the Long-Term scenario (Year 2035), which were used in the project noise study (Appendix E) analysis to derive future traffic noise levels. Estimated long-term traffic noise levels include the cumulative effects of the proposed project and any other related projects in the vicinity.

As shown in Table 5.4-8, long-term traffic noise levels are estimated to range from approximately 58 57 to 70 dB CNEL under long-term baseline conditions and 59 to 71-69 dB CNEL with the project. For all receivers except R7 and R11, noise levels would increase by less than 3 dB relative to near-term baseline existing conditions. At R7, representing future residential land uses west of the proposed roadway extension, the estimated cumulative traffic noise increase would be 3.13 dB (increasing from 56.3 to 59.4 dB CNEL); and at R11, representing residential land uses adjacent to Via Alta, the estimated cumulative traffic noise increase would be 6-4.8 dB (increasing from 57-56.5 to 63-61.3 dB CNEL). Because the resulting noise levels would be less than the exterior residential threshold of 65 dB CNEL, the impacts at both R7 and R11 would be less than significant. Cumulative traffic noise with the proposed project is estimated to result in one nominal exceedance of the City of San Diego's 65 dBA CNEL exterior noise standard for residential land uses. This would occur (at R8, adjacent to Qualcomm Way and south of Friars Road), where noise levels would increase from 65.3 dB CNEL (which is at the threshold of 65 dB CNEL when rounded to the nearest whole number) to 65.7 dB CNEL (which exceeds the threshold when rounded to the nearest whole number) as a result of the project. However, but the associated increase of 0.4 dB would be imperceptible and well below the threshold of less than 3 dB described in Table 5.4-5. Cumulative traffic would not result in

an exceedance of the City of San Diego's exterior noise standard of 65 dBA CNEL for parks, or 70 dB CNEL for churches. ~~At all locations, the project contribution to the overall change in traffic noise levels would be less than 3 dB, ranging from -2 dB to +1 dB.~~ Therefore, the proposed project would not expose people to future transportation noise levels that exceed City ~~standards-thresholds~~ and impacts would be less than significant.

5.4.6.3 Significance of Impacts

Future transportation noise level impacts would be less than significant.

5.4.6.4 Mitigation Measures

Impacts would be less than significant. Therefore, no mitigation measures would be required.

Table 5.4-8. Long-Term (Year 2035) Traffic Noise Model Results (dBA CNEL)

Receiver # – Location	Near-Term Baseline	Long-Term Baseline	Long-Term with Project	Long-Term (Cumulative) Change with Project	Project Contribution to Long-Term Change
R1—Residential adjacent to Friars Road	65	65	64	-1	-1
R2—Residential adjacent to Mission Center Road north of Friars Road	70	70	71	+1	+1
R3—Residential adjacent to Civita Boulevard	61	62	61	0	-1
R4—Residential adjacent to Mission Center Road north of Civita Boulevard	64	65	63	-1	-2
R5—Residential adjacent to Phyllis Place	59	59	60	+1	+1
R6—Church adjacent to Phyllis Place	62	62	62	0	0
R7—Future residential west of Franklin Ridge Road Extension	56	58	59	+3	+1
R8—Residential adjacent to Qualcomm Way	65	65	66	+1	+1
R9—Residential adjacent to Mission Center Road north of project	69	70	69	0	-1
R10—Residential adjacent to Phyllis Place east of Interstate 805	69	69	68	-1	-1
R11—Residential adjacent to Via Alta	57	62	63	+6	+1

<u>Receiver # - Location</u>	<u>Near-Term Baseline</u>	<u>Long-Term Baseline</u>	<u>Long-Term with Project</u>	<u>Long-Term (Cumulative) Change with Project</u>	<u>Project Contribution to Long-Term Change</u>	<u>Effective Noise Level of Project Alone*</u>
R1 – Residential adjacent to Friars Road	64.6	64.8	64.3	-0.3	-0.5	-55.2
R2 – Residential adjacent to Mission Center Road north of Friars Road	68.4	70.0	69.0	0.6	-1.0	-63.1
R3 – Residential adjacent to Civita Boulevard	60.4	63.1	61.3	0.9	-1.8	-58.4
R4 – Residential adjacent to Mission Center Road north of Civita Boulevard	64.3	65.4	62.9	-1.4	-2.5	-61.8
R5 – Residential adjacent to Phyllis Place	59.2	59.4	59.9	0.7	0.5	50.3
R6 – Church adjacent to Phyllis Place	61.7	61.8	62.3	0.6	0.5	52.7
R7 – Future residential west of Franklin Ridge Road Extension	56.3	56.8	59.4	3.1	2.6	55.9
R8 – Residential adjacent to Qualcomm Way	65.3	65.3	65.7	0.4	0.4	55.1
R9 - Residential adjacent to Mission Center Road north of project	69.4	69.6	69.3	-0.1	-0.3	-57.8
R10 – Residential adjacent to Phyllis Place east of Interstate 805	68.5	69.3	68.3	-0.2	-1.0	-62.4
R11 – Residential adjacent to Via Alta	56.5	58.0	61.3	4.8	3.3	58.6
R12 - Phyllis Place Park	59.4	59.6	61.1	1.7	1.5	55.8
* Included for informational purposes only, the values in this column seek to represent the changes in traffic noise levels at each receptor as a single equivalent noise level. Positive values are assigned where the project causes overall noise increases; these values represent the effective traffic noise level attributable to all project changes. Negative values are assigned where the project causes overall noise decreases; these values represent the effective noise level contribution that would need to be removed from the total “Near-Term Baseline” noise level in order to obtain the “Near-Term with Project” noise level.						

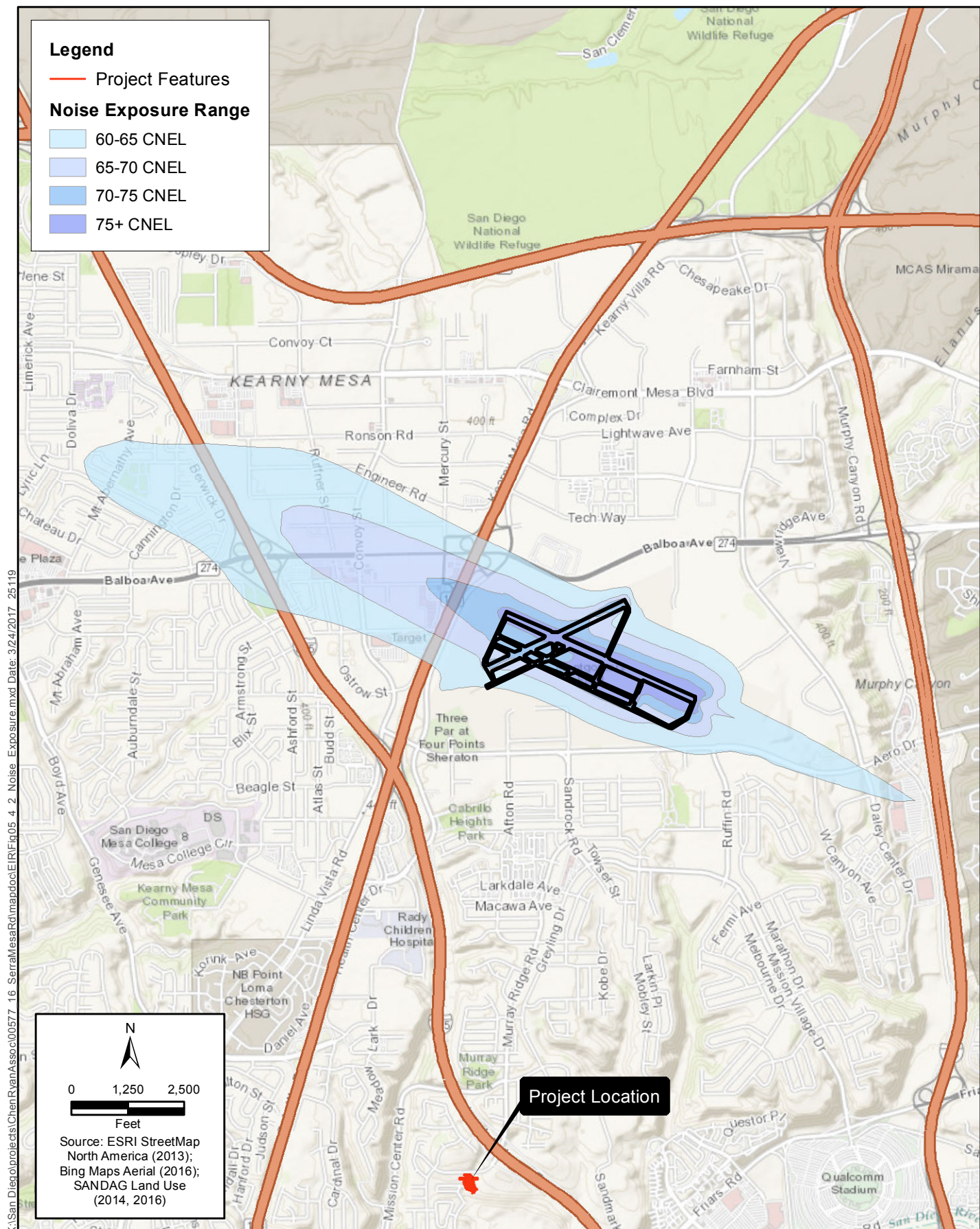


Figure 5.4-2
Montgomery Field Noise Compatibility

5.4.7 Impact Analysis

Issue 5: Groundborne Vibration and Groundborne Noise

Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

5.4.7.1 Impact Discussion

Construction

Project construction would not use particularly high-intensity methods such as pile driving or blasting, but it would use heavy earthmoving equipment that could generate perceptible groundborne vibration or groundborne noise. Based on the anticipated construction equipment list for the proposed project, the worst-case vibration levels would be associated with the operation of heavy earthmoving equipment such as excavators, graders, and dozers. Data published by Caltrans (2013b) indicate that similar heavy equipment items (large bulldozers) produce PPV vibration levels of 0.089 in/sec at a distance of 25 feet.

Vibration levels from construction equipment attenuate as they radiate from the source. The equation to determine vibration levels at a specific distance states that

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.1}$$

where PPV_{ref} is the PPV at a reference distance of 25 feet, and D is the distance from the equipment to the sensitive receptor (Caltrans 2013b). The value of 1.1 is determined based on the soil conditions at the project site, and was chosen to represent hard soil in order to provide a conservative estimate of vibration levels. Using this equation, it is possible to estimate the distances at which potential damage from groundborne vibration would occur, as summarized in Table 5.4-9.

Table 5.4-9. Estimated Distances from Construction Activities to Vibration Effects

Potential Vibration Damage ^a	PPV (in/s) ^b	Distance (feet)
New residential structures	0.5	6
Modern industrial/commercial buildings	0.5	6

^a Criteria based on new/modern buildings because there are no old or fragile buildings in the project vicinity.
^b PPV based on continuous/frequent intermittent sources.

Construction would not occur within 6 feet of any structure, so there would be no impacts related to potential building damage. If nearby homes (within approximately 200 feet) are occupied at the time of project construction, it is possible that groundborne vibration would, at times, be perceptible and may cause a short-term nuisance. However, these effects would be temporary and would cease entirely when heavy construction activities are completed. In addition, it is noted that the City's standard requirements, as well as mitigation measure **MM-NOI-1**, would ensure that groundborne vibration would not occur at nighttime, when people would generally be more susceptible to annoyance and disturbance.

Operation

Groundborne vibration or groundborne noise from traffic on streets, such as the connection proposed in the project, is rarely perceptible at nearby receptors, particularly if a roadway is smooth (as would be the case with the newly constructed roadway). Therefore, groundborne noise and vibration impacts from project operation would be less than significant.

5.4.7.2 Significance of Impacts

Any groundborne vibration or groundborne noise from construction activities would be temporary and would cease at the completion of construction. Project construction activities would not be close enough to existing or planned buildings that they would result in building damage. Although residential uses may be subject to short-term perceptible groundborne vibration during construction, construction activities would only occur during hours allowed by the City's Noise Ordinance (see **MM-NOI-1**). Therefore, impacts would be less than significant.

Operation of the project would not generate noticeable groundborne vibration or groundborne noise, and the impacts would be less than significant.

5.4.7.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.4.8 Impact Analysis

Issue 6: Aircraft Noise Levels

Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan?

5.4.8.1 Impact Discussion

The proposed project is not located within 2 miles of a private airstrip, but it is located approximately 1.8 miles south of the Montgomery Field Airport. Referring to Figure 5.4-2, (*Compatibility Policy Map: Noise*) of the *Montgomery Field Airport Land Use Compatibility Plan* (San Diego County Airport Land Use Commission 2010), the project site is located well outside the airport's 60 dBA CNEL noise contour lines. In addition, the project does not include any new structures or noise-sensitive land uses. As such, the proposed project would not result in airport-related noise impacts for people residing or working in the project area, and impacts would be less than significant.

5.4.8.2 Significance of Impacts

The proposed project would not result in aircraft-related noise impacts for people residing or working in the proposed project area. Impacts would be less than significant.

5.4.8.3 Mitigation Measures

Impacts would be less than significant. Therefore, no mitigation measures would be required.

5.5 Biological Resources

This section describes the existing conditions and applicable laws and regulations for biological resources, and analyzes the potential effect of the proposed project on candidate, sensitive, or special-status species. Information in the following discussion is based on the Biological Resources Letter Report that was prepared for the proposed project and is included as Appendix F-1 of this EIR. ICF prepared a Supplemental Biological Resources Letter Report for the gas line work area, included as Appendix F-2. ICF conducted a biological survey within two small areas immediately east and west of the existing project site for the project in order to determine if sensitive biological resources were present. The survey was conducted when it became apparent that the raising of a gas line to a depth of 3 feet below ground level within the San Diego Gas & Electric easement could be hastened if the project was to proceed prior to the gas line work being performed. Each area where work on the gas line is to occur is approximately 6,000 square feet, for a total work area of 12,000 square feet (0.27 acre). These areas have been incorporated within the project site.

Data regarding existing conditions for biological and jurisdictional resources present within the study area were obtained through a review of pertinent literature and field reconnaissance. The study area is defined as the approximately 2-acre project site and the surrounding 150-foot survey buffer. The literature review included investigation of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants. The field survey included the mapping of vegetation communities and land covers present within the study area, an evaluation of jurisdictional wetlands or waters, and an evaluation of the potential for special-status species to occur in the study area.

5.5.1 Existing Conditions

5.5.1.1 Vegetation Communities/Land Cover Types

The biological resources survey identified one native vegetation community near the center of the project site, disturbed coastal sage scrub, and two land cover types on the project site, which consist of developed land and disturbed habitat.

Coastal Sage Scrub

Coastal sage scrub is a native plant community composed of a variety of low, aromatic shrubs, characteristically dominated by drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and sages (*Salvia* spp.), with scattered evergreen shrubs, including lemonade berry (*Rhus integrifolia*) and laurel sumac (*Malosma laurina*). The coastal sage scrub within the project site is considered disturbed due to the low percent cover of native species.

Dominant native species present on the project site include California sagebrush, bladderpod spiderflower (*Peritoma arborea*), blue dicks (*Dichelostemma capitatum*), and lemonade berry. Nonnative annual weeds such as bromes (*Bromus diandrus*, *B. madritensis*), mustards (*Brassica* sp., *Hirschfeldia* sp., *Sisymbrium* sp.), filaree (*Erodium* sp.), and Russian-thistle (*Salsola tragus*) dominate (55% to 80% cover) this mapped vegetation community on site.

Developed Land

Developed land represents areas that have been constructed upon or otherwise physically altered to an extent that native vegetation communities are not supported. This land cover type generally consists of semipermanent structures, homes, parking lots, pavement or hardscape, and landscaped areas that require irrigation (e.g., ornamental greenbelts). Typically, this land cover type is unvegetated or supports a variety of ornamental plants. Developed land is not regulated by the environmental resource agencies and is included within the disturbed category (Tier IV) and is not considered sensitive under the City's Multiple Species Conservation Program (MSCP) Subarea Plan. Developed land is the predominant land cover within the project site (1.07 acres). This land cover includes previously graded areas associated with the Quarry Falls project.

Disturbed Habitat

Disturbed habitat is a land cover type characterized by a predominance of nonnative species, often introduced and established through human action. Disturbed habitat areas have been physically disturbed (by previous legal human activity) and are no longer recognizable as native or naturalized vegetation, but they continue to retain a soil substrate. Typically, vegetation, if present, is nearly exclusively composed of nonnative plant species such as ornamentals or exotic species (i.e., weeds). Disturbed habitat is not regulated by the environmental resource agencies and is included within the disturbed category (Tier IV) and is not considered sensitive under the City's MSCP Subarea Plan. Disturbed habitat composes 0.77 acre within the project site. It is located primarily south along Phyllis Place and dominated by sweet clover, mustards, stork's bill, and brome grasses.

5.5.1.2 Plant and Wildlife Species

A total of 49 plant species were observed during the surveys: 25 native species (51%) and 24 nonnative species (49%). The floral diversity is high relative to the amount of site disturbance. The complete list of plant species identified on site during the survey in 2015 is provided in Appendix F-1 while Appendix F-2 presents the plant species identified during the supplemental survey effort.

Seven wildlife species were recorded in the study area during the survey (see Appendix F-1). All wildlife species observed are common, disturbance-adapted species typically found in urban and suburban settings, such as common raven (*Corvus corax*), California towhee (*Melospiza crissalis*), and Anna's hummingbird (*Calypte anna*). The habitat is limited in size and disturbed in character, which provides relatively few resources for wildlife due to the lack of cover and structural diversity.

5.5.1.3 Jurisdictional Resources

No jurisdictional wetlands or non-wetland waters were observed within the project site during the biological resource survey.

5.5.1.4 Wildlife Corridors

Regional wildlife corridors connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife over a large area, and the consequent mixing of genes between populations. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of species' daily routines. Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies. The project site is not adjacent to any significant areas of high-quality habitat and is not an identified corridor in the MSCP Subarea Plan.

As the project site is surrounded by existing development and a major freeway (Interstate [I-] 805), it does not currently serve as a regional or local wildlife corridor.

5.5.1.5 Sensitive Biological Resources

According to the City's Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City of San Diego 2012), sensitive biological resources are defined as:

1. **Multi-habitat Planning Area (MHPA):** The MHPA encompasses those lands that have been included within the preserve for the City of San Diego's MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quantity, quality, and connectivity to support the future viability of San Diego's unique biodiversity and thus are considered to be sensitive.
2. **Wetlands:** The definition of wetlands is intended to differentiate uplands (terrestrial areas) from wetlands, and furthermore to differentiate naturally occurring wetland areas from those created by human activities. Except for areas created for the purposes of wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, it is not the intent of the City to regulate artificially created wetlands in historically non-wetland areas unless they have been delineated as wetlands by the U.S. Army Corps of Engineers (USACE) or CDFW.
3. **Vegetation Communities:** Within the MSCP study area, vegetation communities have been divided into four tiers of sensitivity (the first includes the most sensitive, the fourth the least) based on rarity and ecological importance. Those within Tier I, Tier II, Tier IIIA, or Tier IIIB are considered sensitive.
4. **Listed Species:** Habitats supporting plant or animal species that have been listed or proposed for listing by the federal or state government as rare, endangered, or threatened ("listed species") are also considered sensitive biological resources. It should be noted that some listed species are considered adequately conserved under the MSCP (Covered Species), while others are not (Listed Non-covered Species).
5. **Narrow Endemic Species:** Species adopted by the City Council as Narrow Endemic Species, identified within the City's Biology Guidelines, are considered sensitive biological resources. It should be noted that some Narrow Endemic Species are also listed species.
6. **Covered Species:** These are species included in the Incidental Take Permit (ITP) issued to the City by the federal or state government as part of the City's MSCP Subarea Plan. Exceptions to this are the MSCP Covered Species that are listed wetlands species. The term "non-covered species" is sometimes used to identify species not included in the ITP. A list of the Covered Species is provided in Appendix A of the City's Biology Guidelines.

The project site is not within or adjacent to the MHPA and is not within the Coastal Overlay Zone. In addition, as previously detailed, there are no wetlands on site. According to the City's Biology Guidelines, for parcels outside of the MHPA and the Coastal Overlay Zone, there is no limit on encroachments into sensitive biological resources, with the exception of wetlands and Listed Non-covered Species' habitat (which are regulated by federal and state agencies) and Narrow Endemic Species as described below. However, impacts on sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance with Section III of the City's Biology Guidelines. Sensitive biological resources observed or with a moderate to high potential to

occur are detailed below. The significance of impacts on these species and mitigation are detailed thereafter in Section 5.5.3.

A search of CNPS and California Natural Diversity Database records was utilized to develop matrices of special-status plant and wildlife species that may have potential to occur on site due to the presence of suitable habitat (taking into consideration vegetation communities, soils, elevation, geographic range, life form/blooming period, and other factors). These two matrices of special-status plant and wildlife species (i.e., federally, state, or locally listed species), their favorable habitat conditions, and their potential to occur on site based on the findings of the field investigations are presented in Appendices B and C of the Biological Resources Letter Report, respectively (Appendix F-1). Species considered special-status under the MSCP Subarea Plan, including Narrow Endemic Species, are also included in Appendices B and C of the Biological Resources Letter Report.

Sensitive Vegetation Communities

One sensitive vegetation community, disturbed coastal sage scrub, was observed on site. The project site contains approximately 0.25 acre of disturbed coastal sage scrub. The coastal sage scrub within the project site is considered disturbed due to the low percent cover of native species. This vegetation community is ranked as Tier II and is considered sensitive.

Sensitive Plant Species

Two sensitive plant species were observed on site, as discussed below.

San Diego barrel cactus (*Ferocactus viridescens*) was observed at two locations (approximately five individuals) south of the transmission line within the disturbed coastal sage scrub. This plant has a California Rare Plant Rank (CRPR) of 2B.1 and is an MSCP Covered Species. The San Diego barrel cactus is not a Narrow Endemic Species. Plants in the category of CRPR 2B are rare, threatened, or endangered in California, but more common elsewhere and not eligible for consideration under the provisions of the Endangered Species Act (ESA) (California Native Plant Society 2016).

San Diego County sunflower (*Bahiopsis laciniata*; previously referred to as the San Diego viguiera) was also observed on site. This plant is listed as CRPR 4.2 and is also within the disturbed coastal sage scrub. The CRPR 4 category includes plants that are of limited distribution and is considered a "watch list" for species that could require additional protection if populations decline further. It is not listed as MSCP Covered Species or a Narrow Endemic Species.

Sensitive Wildlife Species

No sensitive wildlife species were observed on site. Three wildlife species have a moderate potential to occur on site: coastal California gnatcatcher (*Polioptila californica californica*), Dulzura pocket mouse (*Chaetodipus californicus femoralis*), and northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*). In addition, the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG) Section 3503.5 protect the active nests of native migratory birds and raptors.

Coastal California gnatcatcher has moderate potential to occur on site, and is federally listed as threatened, a California Species of Special Concern, and an MSCP Covered Species. As the disturbed coastal sage scrub present on site is of marginal quality, limited in size, and substantially disturbed in character, the species may forage on site, but nesting potential is low. An historical occurrence was recorded within 1,000 feet of the project site near I-805. The MHPA is not within or adjacent to

the proposed project site; therefore, grading restrictions during the coastal California gnatcatcher breeding season do not apply to this project pursuant to the City's Biology Guidelines (2012).

Dulzura pocket mouse and northwestern San Diego pocket mouse have a moderate potential to occur on the project site. These species are both designated as California Species of Special Concern, but are not MSCP Covered Species. The site is substantially disturbed and historically graded and likely does not provide much cover from potential predators.

Although the study area supports very limited suitable vegetation for bird nesting, there is a moderate potential for raptors and other migratory native birds to nest within trees east and west of the project site, including the ornamental landscaping to the north associated with existing development.

5.5.2 Regulatory Framework

5.5.2.1 Federal

Endangered Species Act

The federal ESA of 1973, as amended (16 U.S. Code [U.S.C.] 1531 et seq.), provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from "taking" endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult the U.S. Fish and Wildlife Service (USFWS) to ensure adequate protection of listed species that may be affected by the project.

Migratory Bird Treaty Act

The MBTA was enacted in 1918 to prohibit the killing or transport of native migratory birds, or any part, nest, or egg of any such bird, unless allowed by another regulation adopted in accordance with the MBTA. A list of migratory bird species that are protected by the MBTA is maintained by USFWS, which regulates most aspects of the taking, possession, transportation, sale, purchase, barter, exportation, and importation of migratory birds. Under the MBTA, "take" means to kill, directly harm, or destroy individuals, eggs, or nests or to otherwise cause failure of an ongoing nesting effort. Permits are available under the MBTA through USFWS, and authorization for potential take under the MBTA is addressed as part of the ESA Section 7 consultation process. The proposed project must be analyzed to ensure consistency with the MBTA, including avoidance of take of nesting birds, their eggs, or activities that may cause nest failure. Any potential take must be either permitted through consultation with USFWS or avoided and minimized through mitigation measures.

Clean Water Act

The federal Water Pollution Control Act (also known as the Clean Water Act) (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987 (PL 1000-4), is the major federal legislation governing water quality. The purpose of the Clean Water Act is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Discharges into waters of the United States are regulated under Section 404. Waters of the United States include (1) all navigable waters (including all waters subject to the ebb and flow of tides); (2) all interstate waters and wetlands; (3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand

flats, wetlands, sloughs, or natural ponds; (4) all impoundments of waters mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and (7) all wetlands adjacent to waters mentioned above. In California, the State Water Resources Control Board and the nine Regional Water Quality Control Boards are responsible for implementing the Clean Water Act.

Relevant sections of the Clean Water Act concerning biological resources are related to Section 404. This section provides for issuance of dredge/fill permits by the USACE. Permits typically include conditions to minimize impacts on water quality. Common conditions include USACE review and approval of sediment quality analysis before dredging, a detailed pre- and post-construction monitoring plan that includes disposal site monitoring, and required compensation for loss of waters of the United States.

USACE has primary federal responsibility for administering regulations that concern waters and wetlands under two statutory authorities, the Rivers and Harbors Act (33 U.S.C. Sections 9 and 10), which governs specified activities in navigable waters, and the Clean Water Act (Section 404), which governs specified activities in waters of the United States, including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, natural ponds) are a subset of waters of the United States and receive protection under Section 404 of the Clean Water Act. USACE requires obtaining a permit if a project proposes placing structures within navigable waters and/or altering waters of the United States.

5.5.2.2 State

California Fish and Game Code

The CFGC regulates the taking or possession of birds, mammals, fish, amphibians, and reptiles, as well as natural resources such as wetlands and waters of the state. Most of the code is administered or enforced by CDFW (before January 1, 2013, California Department of Fish and Game). Applicable sections of the CFGC are discussed below.

CFGC Section 2050 et seq. (California Endangered Species Act; CESA) prohibits the “take” (defined as “to hunt, pursue, catch, capture, or kill”) of state-listed species except as otherwise provided in state law. The CESA is administered by CDFW and is similar to the federal ESA. State lead agencies are required to consult with CDFW to ensure that their authorized actions are not likely to jeopardize the continued existence of any state-listed species or result in the degradation of occupied habitat.

CFGC Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, while **Section 3503.5** specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders Falconiformes and Strigiformes), including their nests or eggs. Typical violations of these codes include destruction of active nests resulting from removal of vegetation in which the nests are located. Violation of Section 3503.5 could also include failure of active raptor nests resulting from disturbance of nesting pairs by nearby project construction. This statute does not provide for the issuance of any type of incidental take permit.

Protection of fully protected species is described in **CFGC Sections 3511, 4700, 5050, and 5515**. These species include certain fish, amphibian and reptile, bird, and mammal species. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take of fully protected species.

Section 3513 protects California's migratory birds by making it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird.

The Native Plant Protection Act (~~CEGC~~ **Section 1900** et seq.) includes measures to preserve, protect, and enhance rare and endangered native plant species. Definitions for "rare and endangered" are different from those contained in CESA, although CESA-listed rare and endangered species are included in the list of species protected under the act.

Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), provides for statewide coordination of water quality regulations. The act established the California State Water Resources Control Board as the statewide authority, and nine separate Regional Water Quality Control Boards were developed to oversee water quality on a day-to-day basis. Regional Water Quality Control Boards also adopt and implement water quality control plans (basin plans) that recognize and are designed to maintain the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, maintaining water quality, and addressing the water quality problems of that region. Designated beneficial uses of state waters that may be protected against water quality degradation include preservation and enhancement of fish, wildlife, designated biological habitats of special significance, and other aquatic resources or preserves.

5.5.2.3 Local

Multiple Species Conservation Program

The City, USFWS, CDFW, and other local jurisdictions joined together in the late 1990s to develop the MSCP, a comprehensive program to preserve a network of habitat and open space in the region and ensure the viability of (generally) upland habitat and species, while still permitting some level of continued development. The City's MSCP Subarea Plan (1997a) was prepared pursuant to the outline developed by USFWS and CDFW to meet the requirements of California's Natural Communities Conservation Planning Act of 1992. Adopted by the City in March 1997, the Subarea Plan forms the basis for the MSCP Implementing Agreement, which is the contract between the City, USFWS, and CDFW (City of San Diego 1997b). The Implementing Agreement ensures implementation of the Subarea Plan and allows the City to issue "take" permits under the federal ESA and CESA to address impacts at the local level. Under the federal ESA, an ITP is required when non-federal activities would result in "take" of a threatened or endangered species. A Habitat Conservation Plan, such as the City's MSCP Subarea Plan, must accompany an application for a federal ITP. In July 1997, USFWS, CDFW, and the City entered into the 50-year MSCP Implementing Agreement, wherein the City received its federal ESA Section 10(a) ITP (City of San Diego 1997b).

Pursuant to its Section 10(a) ITP, the City has incidental "take" authority over 85 rare, threatened, and endangered species including regionally sensitive species that it aims to conserve (i.e., "MSCP Covered Species"). "MSCP Covered" refers to species that are covered by the City's federal ITP and

considered to be adequately protected within the City's Preserve, the MHPA; see subsection below for additional information). Special "Conditions of Coverage" apply to MSCP Covered Species that would be potentially affected by projects including modifying project design to avoid impacts on Covered Species in the MHPA where feasible. Additionally, all projects must adhere to MSCP Subarea Plan requirements including those for boundary line adjustments (Section 1.1.1) and Compatible Land Uses, General Planning Policies/Design Guidelines, and MHPA Land Use Adjacency Guidelines (Sections 1.4.1–1.4.3), as well as general and specific management policies where applicable. Compliance with additional state and federal policies, regulations, and permits may also be required for wetlands and species not covered or fully covered under the MSCP.

Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]" (City of San Diego 1997a) and MSCP Subarea Plan requirements.

The MHPA consists of public and private lands, much of which has been conserved. Conserved lands include lands that have been set aside for mitigation or purchased for conservation. These lands may be owned by the City (i.e., dedicated lands) or other agencies, may have conservation easements, or may have other restrictions (e.g., per the City's Municipal Code's Environmentally Sensitive Lands [ESL] Regulations [ESL; see subsection below for additional information]) that protect the overall quality of the resources and prohibit development.

A maximum 25% encroachment into the MHPA is allowed for development within the site premises. If 25% of the site is outside the MHPA, development could be restricted to this area. In addition, development is required to be located in the least-sensitive area feasible. Should more than 25% encroachment be desired, an MHPA boundary line adjustment may be proposed. For parcels outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by State and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's ESL Regulations, as implemented through compliance with the City's Biology Guidelines (City of San Diego 2012).

Multi-Habitat Planning Area Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts on the MHPA, the MSCP Subarea Plan Section 1.4.3 details MHPA Land Use Adjacency Guidelines that are to be implemented for land use proposals adjacent to the MHPA. The MHPA Land Use Adjacency Guidelines are intended to be incorporated into the Mitigation Monitoring and Reporting Program or applicable permits during the development review phase of a proposed project. These guidelines address the issues of drainage, toxic substances, lighting, noise, barriers, invasive species, brush management, and grading/land development.

City of San Diego Environmentally Sensitive Lands Regulations

ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the

requirements of the City's Biology Guidelines (2012) as outlined in the City's Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). Impacts on biological resources within and outside the MHPA must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City.

The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands." The regulations require that development avoid impacts on certain sensitive biological resources as much as possible including but not limited to MHPA lands; wetlands and vernal pools in naturally occurring complexes; federally and state-listed, non-MSCP Covered Species; vegetation communities classifiable as Tier I, II, IIA, or IIIB; habitat for rare, endangered, or threatened species; and MSCP Narrow Endemic Species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values. While a 100-foot buffer width is generally recommended, this width may be increased or decreased on a case-by-case basis in consultation with CDFW, USACE, and USFWS (City of San Diego 2012).

City of San Diego General Plan

The City's General Plan (City of San Diego 2008a) presents goals and policies for biological resources in the Conservation Element, including protecting and conserving the landforms, canyon lands, and open spaces that serve as core biological areas and wildlife linkages or are wetland habitats; encouraging the removal of invasive plant species and planting of native plants near open space preserves; applying the appropriate zoning and ESL regulations to limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands; limiting and controlling runoff, sedimentation, and erosion during and after construction; preserving natural habitats pursuant to the MSCP; and implementing a no net loss approach to wetlands conservation in accordance with regulations.

5.5.3 Significance Determination Thresholds

5.5.3.1 Issue Questions

As identified in the City's Significance Determination Thresholds (2016), a project would exceed the thresholds of significance if it results in:

1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS.
2. A substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.
3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, and riparian) through direct removal, filling, hydrological interruption, or other means.
4. Substantial interference 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 Subarea Plan, or impede the use of native wildlife nursery sites.

5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.
6. Introduction of land use within an area adjacent to the MHPA that would result in adverse edge effects.
7. A conflict with any local policies or ordinances protecting biological resources.
8. An introduction of invasive species of plants into a natural open space area.

5.5.3.2 Methods and Assumptions

Potential impacts on biological resources are assessed through review of the project's consistency with existing regulations (i.e., City's Biology Guidelines and MSCP Subarea Plan). Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City's Significance Determination Thresholds (City of San Diego 2016), proceeds in two steps. The first step consists of determining if significant biological resources are present. The second step is to determine the potential for direct and indirect impacts on identified sensitive biological resources that would occur as a result of the proposed project.

Pursuant to the City's Significance Determination Thresholds, occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

Direct Impacts

- Any encroachment in the MHPA is considered a significant impact on the preservation goals of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would require a boundary adjustment that would include a habitat equivalency assessment to ensure that any addition to the MHPA is at least equivalent to any subtraction from it.
- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts on these resources may be considered significant.
- Impacts on individual sensitive species, outside of any impacts on habitat, may also be considered significant based upon the rarity of the species and extent of the impacts. Impacts on federally or state-listed species and all City Narrow Endemic Species should be considered significant.
- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

Indirect Impacts

The City's Significance Determination Thresholds indicate that, depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts.

- Introduction of urban meso-predators into a biological system

- Introduction of urban runoff into a biological system
- Introduction of invasive exotic plant species into a biological system
- Noise and lighting impacts
- Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles
- Loss of a wetland buffer that includes no environmentally sensitive lands

5.5.4 Impact Analysis

Issue 1: Sensitive Species

Would the proposed project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS?

5.5.4.1 Impact Discussion

Direct Impacts

Plant Species

The project is anticipated to result in direct impacts on special-status plant species, including the San Diego barrel cactus and the San Diego County sunflower detected on site. Potential direct impacts on these species would include removal of individuals during grading activities for the roadway. San Diego barrel cactus is not a Narrow Endemic Species and is a Covered Species under the City's MSCP permit. In addition, the presence of five individuals constitutes a small number of the population. San Diego County sunflower has a lower status and a minimal presence within a small patch of disturbed habitat on the project site.¹ Because these species are not classified as Narrow Endemic Species, and also due to the disturbed nature of the coastal sage scrub, the project's location outside of the MHPA, and limited number of individuals, impacts on these species would not be considered significant. Furthermore, as discussed in Issue 2 below, the project would be required to provide habitat-based mitigation in the form of offsite habitat acquisition due to impacts on the disturbed coastal sage scrub. Therefore, impacts on sensitive plant species would be less than significant.

Wildlife Species

The project site does not contain any trees or other suitable habitat for nesting raptors or other native migratory birds, and therefore would not result in any direct impacts on these species. As previously discussed, coastal California gnatcatcher was recorded within habitat located 1,000 feet east of the project site, to the east of the site near I-805. No other special-status species have been recorded within or adjacent to the project site. Although not observed within the project site, coastal California gnatcatcher, Dulzura pocket mouse, and northwestern San Diego pocket mouse have a moderate potential to occur. The coastal sage scrub within the project site is limited in size and highly disturbed in character, providing relatively few resources for wildlife due to the lack of cover

¹ San Diego County sunflower is being recommended to be removed from the CNPS list, as it is common and widespread in San Diego County (City of San Diego 2008b).

and structural diversity. Additionally, there is no suitable habitat within the project site that would support nesting for the coastal California gnatcatcher. Construction activities would have the potential to directly affect species that may not be able to disperse from the site. Therefore, impacts would be significant and mitigation would be required (**Impact BIO-1**). Following construction, the disturbed coastal sage scrub would be removed, thereby resulting in a loss of habitat that has moderate potential to be utilized by these species. As discussed in Issue 2 below, the project would be required to provide habitat-based mitigation in the form of offsite habitat acquisition due to impacts on the disturbed coastal sage scrub.

Indirect Impacts

As previously detailed, the project site is not within the MHPA and therefore would not be subject to the Land Use Adjacency Guidelines. The project site is also not adjacent to the MHPA or other sensitive vegetation communities. The project site does, however, contain disturbed coastal sage scrub. As the project would remove this sensitive vegetation community, indirect impacts on sensitive species potentially utilizing this habitat would be mitigated through the purchase of offsite habitat.

Therefore, indirect impacts would be related to potential noise and lighting impacts on trees adjacent to the project site that have the potential to support nesting raptors and other native migratory birds. Concerning lighting, the project would not require any nighttime construction and therefore would not result in short-term lighting impacts. Following construction, the roadway would require lighting. As detailed in Chapter 3, *Project Description*, the project would comply with all applicable City regulations that would ensure there would be no spillover lighting and thus would not affect nesting activities. Concerning noise during construction, noise levels may temporarily exceed background levels, potentially resulting in nest abandonment for raptors and other native migratory birds that may utilize trees adjacent to the project site. Impacts would be significant and mitigation is required (**Impact BIO-2**). Following construction, operation of the roadway would slightly increase ambient noise levels within the vicinity of the project site; however, it would not significantly increase levels and raptors and other migratory native birds would be able to utilize trees for nesting activities.

5.5.4.2 Significance of Impacts

As detailed below under Issue 2, offsite purchase of habitat credits would ensure that removal of the disturbed coastal sage scrub (that contains sensitive plant species and is potentially utilized by sensitive wildlife species) would be less than significant.

Construction of the proposed project could result in direct impacts on sensitive species that have moderate potential to utilize the disturbed coastal sage scrub on site (**Impact BIO-1**). The proposed project would also have the potential to result in significant indirect impacts on raptors or other migratory birds if the species nests in trees adjacent to the project site (**Impact BIO-2**). Therefore, impacts would be potentially significant and mitigation is required.

5.5.4.3 Mitigation Measures

MM BIO-1: Sensitive Species and Migratory Birds

BIOLOGICAL RESOURCE PROTECTION DURING CONSTRUCTION

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012) has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow-up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including, but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Regulations, project permit conditions; CEQA, endangered species acts, and/or other local, state or federal requirements.
- D. **BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, it shall include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, barrel cactus recovery and relocation, burrowing owl exclusions), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City's Assistant Deputy Director or the MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Avian Protection Requirements:** To avoid any direct impacts to sensitive, MSCP-Covered, listed, threatened, or endangered species, or species in the list of raptors provided on page 12 (Restrictions on Grading) of the Biology Guidelines, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the established breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City MMC for review and approval.

prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, construction barriers/buffers) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section or Resident Engineer, and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. Resource Delineation: Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

- G. Education: Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers and the flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas).

II. During Construction

- A. Monitoring: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. If barrel cactus are identified during construction, they shall be recovered and relocated off the project site to a suitable location. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. Subsequent Resource Identification: The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state, or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City Assistant Deputy Director or MMC within 30 days of construction completion.

5.5.4.4 Significance after Mitigation

Mitigation measure **MM BIO-1** would reduce impacts on sensitive wildlife species, raptors, and other migratory birds (**Impact BIO-1** and **Impact BIO-2**) to less-than-significant levels by ensuring that construction would not directly affect species and that construction noise would not adversely affect nests by providing appropriate avoidance measures.

5.5.5 Impact Analysis

Issue 2: Sensitive Habitat

Would the proposed project result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

5.5.5.1 Impact Discussion

Direct Impacts

Tier I, IIIA, and IIIB Habitats were not identified within the project site. The project site contains approximately 0.25 acre of disturbed coastal sage scrub habitat, a Tier II Habitat, as well as developed lands and disturbed habitats, both Tier IV (Figure 5.5-1).

Construction of the proposed project would result in direct impacts on vegetation communities due to grading and other ground-disturbing activities. Permanent impacts would occur in areas where hardscape features would replace vegetated (non-developed) areas. Temporary impacts would occur in the areas affected by initial construction, but those areas would be restored post-construction to retain vegetation. Direct impacts on vegetation communities and land cover types are presented in Table 5.5-1. A total of 0.25 acre of Tier II sensitive upland habitat (i.e., coastal sage scrub, including the disturbed form) would be directly affected by the proposed project, and impacts would be significant (**Impact BIO-3**).

Table 5.5-1. Direct Impacts on Vegetation Communities and Land Cover Types

Vegetation Community/Land Cover Type	Subarea Plan Tier	Total Impacts
Disturbed Coastal Sage Scrub	Tier II	0.25
Developed Land	Tier IV	0.91
Disturbed Habitat	Tier IV	1.00
Total		2.16

Indirect Impacts

As previously detailed, the project site is not within or adjacent to the MHPA and therefore would not be subject to the Land Use Adjacency Guidelines. However, construction activities for the proposed project, including grading and vehicles driving on unpaved surfaces, have the potential to cause fugitive dust. The new connector road would increase the amount of impervious surface in the area that would result in additional stormwater runoff, which drains via streets and the storm drain system toward the San Diego River and eventually flows into the Pacific Ocean. There are no undisturbed native vegetation communities directly adjacent to the project site, and the surrounding area is disturbed, developed, or undergoing construction.

The proposed project would be required to implement mandatory dust control requirements, including utilizing water trucks pursuant to the San Diego Air Pollution Control District's Rule 55. In addition, the proposed project would be required to comply with the City's Municipal Separate Storm Sewer System Permit and implement hydromodification management requirements to mitigate the potential for increased runoff rates and durations caused by development and increased impervious surfaces.² Implementation of other stormwater regulations, including best management practices and the construction Stormwater Pollution Prevention Plan, are also expected to substantially control other potential adverse effects during and following construction both adjacent to and downstream from the project site.

5.5.5.2 Significance of Impacts

The proposed project would directly affect (both temporarily and permanently) a total of approximately 0.25 acre of coastal sage scrub habitat, a Tier II habitat (**Impact BIO-3**). The proposed project would not indirectly affect (either temporarily or permanently) any sensitive habitats. Direct impacts would be significant and mitigation is required. Impacts would occur outside the MHPA; therefore, in accordance with the City's Biology Guidelines, a 1:1 mitigation ratio would be required if mitigation occurs within the MHPA, for a total of 0.25 acre. If mitigation is proposed outside the MHPA, a mitigation ratio of 1.5:1 would be required, for a total of 0.38 acre.

5.5.5.3 Mitigation Measures

MM BIO-2: Coastal Sage Scrub Habitat

Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, evidence shall be provided that demonstrates a total of 0.25 acre of credit from the San Diego Habitat Acquisition Fund or another approved mitigation bank (such as Marron Valley) has been acquired to mitigate the loss of disturbed coastal sage scrub (Tier II).

5.5.5.4 Significance after Mitigation

Mitigation measure **MM BIO-2** would reduce impacts on disturbed coastal sage scrub (**Impact BIO-3**) to less-than-significant levels, as the project would be required to ensure in-kind replacement of this sensitive vegetation community.

² Please see Section 5.8, *Hydrology and Water Quality*, for a more detailed discussion of the required water quality compliance measures and regulations.



**Figure 5.5-1
Biological Resources**

5.5.6 Impact Analysis

Issue 3: Jurisdictional Resources

Would the proposed project have a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, and riparian) through direct removal, filling, hydrological interruption, or other means?

5.5.6.1 Impact Discussion

No jurisdictional wetlands or non-wetland waters were observed on the project site; therefore, no impacts on jurisdictional resources would occur.

5.5.6.2 Significance of Impact

Implementation of the proposed project would have no impact on wetlands because no jurisdictional wetlands or non-wetland waters were observed on the site.

5.5.6.3 Mitigation Measures

As no impact would occur, no mitigation is required.

5.5.7 Impact Analysis

Issue 4: Wildlife Corridors

Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Subarea Plan, or impede the use of native wildlife nursery sites?

5.5.7.1 Impact Discussion

The project site is not within an area that serves as an important habitat linkage or wildlife corridor and is not an identified corridor in the City's MSCP Subarea Plan. The project site is not adjacent to any significant areas of high-quality habitat and the habitat within the project site is limited in size. As a result, there is a lack of connectivity to adjacent habitats that could be used as corridors.

5.5.7.2 Significance of Impacts

Implementation of the proposed project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species. Therefore, impacts would be less than significant.

5.5.7.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.5.7.4 — Significance after Mitigation

~~Impacts would remain less than significant.~~

5.5.8 Impact Analysis

Issues 5 – 7: Plan Consistency

Would the proposed project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Would the proposed project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

Would the proposed project conflict with any local policies or ordinances protecting biological resources?

5.5.8.1 Impact Discussion

The project site is surrounded by urban development. Within the project site, habitat is limited in size and disturbed in character, which provides relatively few resources for wildlife due to the lack of cover and structural diversity.

As identified in the City's MSCP Subarea Plan, the project site is in an "Urban Area" and is not within or adjacent to the MHPA. The nearest MHPA is approximately 0.28 mile west and approximately 0.76 mile south of the site; therefore, adverse edge effects on areas adjacent to the MHPA are not anticipated. As such, the MHPA Land Use Adjacency Guidelines do not apply to this project. Implementation of stormwater regulations is expected to minimize other potential adverse edge effects during and following construction both adjacent to and downstream from the project site.

Due to the disturbed nature of the majority of the site, future implementation of the proposed project would not conflict with provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other local policies or ordinances protecting biological resources. The proposed project would result in no net loss of biological resources and would be compliant with the goals of the City's MSCP.

5.5.8.2 Significance of Impact

Implementation of the proposed project would be consistent with applicable policies, ordinances, and land use plans protecting biological resources. Therefore, impacts would be less than significant.

5.5.8.3 Mitigation Measures

No mitigation would be required.

5.5.9 Impact Analysis

Issue 8: Invasive Species

Would the proposed project result in an introduction of invasive species of plants into a natural open space area?

5.5.9.1 Impact Discussion

Construction activities have the potential to introduce nonnative plants to adjacent habitat by carrying seeds from outside sources on vehicles, people, and equipment. However, nonnative plant species are a part of the existing conditions within the project site and adjacent areas, and the project site is surrounded by urban development. In addition, as detailed within Chapter 3, *Project Description*, landscaping as part of the proposed project would include native species and be consistent with landscaping plans and permit conditions. Therefore, the proposed project is not anticipated to result in an introduction of invasive species of plants into a natural open space area and impacts would be less than significant.

5.5.9.2 Significance of Impact

Implementation of the proposed project would not result in an introduction of invasive species of plants into a natural open space area. Therefore, less-than-significant impacts are anticipated.

5.5.9.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.6 Paleontological Resources

This section discusses existing paleontological conditions and analyzes potential impacts on paleontological resources resulting from the proposed project. Information provided in the analysis is partially based on the Quarry Falls PEIR (City of San Diego 2008, incorporated by reference) as well as the Geotechnical Reconnaissance prepared by Geocon, included as Appendix G to this DEIR.

5.6.1 Existing Conditions

Paleontological resources (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life. Fossil remains, such as bones, teeth, shells, and leaves, are found in the geologic deposits within which they were originally buried. For the purposes of this discussion, paleontological resources can be thought of as not only actual fossil remains but also the collecting localities and the geologic formations containing those localities (City of San Diego 2016).

Geologic formations are often rated according to their potential for yielding paleontological resources, described as their “sensitivity” rating (City of San Diego 2016). Specifically, geologic formations are categorized with use of a scale that rates sensitivity between high and zero. High sensitivity ratings are assigned to formations that are known to contain paleontological sites with rare, well-preserved, critical fossil materials for interpretation as well as fossils that provide important information. Zero sensitivity is assigned to geologic formations that are entirely plutonic in origin and, therefore, have no potential for producing fossil remains.

The surficial deposits within the project site consist of compacted fill, undocumented fill, topsoil, alluvium, and Terrace Deposits that are underlain by the Stadium Conglomerate Formation. Compacted fill, associated with the adjacent grading operations, is present along the western margins of the proposed roadway. The northern portion of the proposed roadway is underlain by undocumented fill that is most likely associated with the original construction of Phyllis Place. The maximum thickness is anticipated to be approximately 70 feet. This fill consists of silty sand to sandy silt with gravel and cobble. Approximately 6 to 8 feet of alluvial soils exist within the drainage channel. These typically consist of medium-dense, silty, fine to coarse sand with abundant gravel and cobble. Terrace Deposits very likely underlie the topsoil but are exposed on the existing cut slope west of the proposed roadway. It is likely that these deposits, which have been mapped as old alluvium, will not be encountered during grading operations (Appendix G).

The Stadium Conglomerate Formation is composed of an Upper Member and a Lower Member. The Upper Member has yielded foraminifera and marine mollusks; the Lower Member has yielded benthic foraminifera and mammal assemblages. The Stadium Conglomerate Formation is identified as having high paleontological resources sensitivity (City of San Diego 2016).

5.6.2 Regulatory Framework

5.6.2.1 State

CEQA Guidelines

Pursuant to Section 15065 of the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations [CCR] Sections 15000–15387), a lead agency must determine if “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.”

California Public Resources Code

Chapter 1.7, Section 5097.5 of the California Public Resources Code states that any unauthorized disturbance or removal of a fossil site or fossil remains on public lands, including land under the jurisdiction of any city, as a misdemeanor and specifies that state agencies may undertake surveys and excavations as necessary on state lands to preserve or record paleontological resources. Section 30244 of the California Public Resources Code requires reasonable mitigation of adverse impacts on paleontological resources that occur as a result of development on public lands.

5.6.2.2 Local

City of San Diego

Neither the City of San Diego General Plan nor the City’s Municipal Code contains regulations or policies regarding paleontological resources. However, the City of San Diego Paleontological Guidelines (2002) provides steps to identify and mitigate significant impacts on paleontological resources, including implementation of mitigation, monitoring, and reporting programs for both public and private projects.

5.6.3 Significance Determination Thresholds

5.6.3.1 Issue Questions

According to the City’s Significance Determination Thresholds, the proposed project would have a significant impact related to paleontological resources if it would:

1. Require over 1,000 cubic yards of excavation in a high-resource potential geologic deposit/formation/rock unit; or
2. Require over 2,000 cubic yards of excavation in a moderate-resource potential geologic deposit/formation/rock unit.

5.6.4 Impact Analysis

Issue 1: Paleontological Resources

Would the project require over 1,000 cubic yards of excavation in a high-resource potential geologic deposit/formation/rock unit or require over 2,000 cubic yards of excavation in a moderate-resource potential geologic deposit/formation/rock unit?

5.6.4.2 Impact Discussion

As discussed under Section 5.6.2, *Environmental Setting*, the project site is underlain by compacted fill, undocumented fill, topsoil, alluvium, and Terrace Deposits that are underlain by the Stadium Conglomerate Formation. According to the City's Significance Determination Thresholds, the Stadium Conglomerate Formation has high paleontological resource sensitivity and, therefore, the potential to contain significant paleontological resources (City of San Diego 2016).

As described in Chapter 3, *Project Description*, construction activities associated with the proposed project would only require the placement of fill within the project site. There would be no ground-disturbing activities, such as excavation or trenching, which would result in more than 1,000 cubic yards of excavation at a depth of 10 feet or more. Therefore, because the project would not excavate more than 1,000 cubic yards of soil at a depth of more than 10 feet, impacts would be less than significant.

5.6.4.3 Significance of Impact

Although the project site is located on a geological formation with high sensitivity to contain paleontological resources, project construction activities would not require excavation or trenching and therefore would not result in more than 1,000 cubic yards of excavation at a depth of 10 feet or more. No impact on paleontological resources would occur.

5.6.4.4 Mitigation Measures

No impact would occur; therefore, no mitigation is required.

5.7 Historical and Tribal Cultural Resources

This section analyzes potential impacts resulting from the proposed project on historical (archaeological and built-environment) and tribal cultural resources. Potential impacts that may result from implementation of the proposed project have been evaluated in accordance with the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2016a), the City of San Diego *Land Development Code, Historical Resources Regulations* (Chapter 14, Article 3, Division 2), and the *Historical Resources Guidelines* (City of San Diego 2001).

Historical resources are the physical features that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may be natural or constructed and can include archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, and landscapes. Traditional cultural properties, tribal cultural resources, and distinguishing architectural characteristics are also considered historical resources.

A tribal cultural resource is further defined in Public Resources Code (PRC) Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. The tribal cultural resources discussion in this section is provided in accordance with state Assembly Bill 52.

Information in the following discussion is based on the Quarry Falls PEIR, which included the *Cultural Resources Study for the Quarry Falls Project* prepared by ASM Affiliates Inc. (2006), as well as an updated records search and supplemental information from past studies conducted in the vicinity of the project site. It should be noted that the cultural resources study area for the Quarry Falls report included the project site analyzed within this DEIR.

5.7.1 Existing Conditions

5.7.1.1 Prehistoric Resources

The prehistory of the region is evidenced through archaeological remains representing up to 10,500 years of Native American occupation. The Creation Story and history that is repeated by the local Native American groups, now and at the time of earlier ethnographic research, indicate both their presence here since the time of creation and, in some cases, migration from other areas. The earliest archaeological remains in San Diego County are believed by some investigators to represent a nomadic hunting culture characterized by the use of a variety of scrapers, choppers, bifacially worked stone tools, large projectile points and crescentics, a scarcity or absence of milling implements, and a preference for fine-grained volcanic rock over metaquartzite materials. A gathering culture that subsisted largely on shellfish and plant foods from the abundant littoral (near-shore) resources of the area is seen in the archaeological record dating from about 6000 BC to AD 0. The remains from this time period include stone-on-stone grinding tools (mano and metate), cobble-based flaked lithic technology, and flexed human burials. (City of San Diego 2007.)

The Late Prehistoric Period (Common Era 0 to 1769) in the City of San Diego is represented by the people ancestral to the Kumeyaay people of today. Prehistorically, the Kumeyaay were a hunting

and gathering culture that adapted to a wide range of ecological zones from the coast to the Peninsular Range. A shift in grinding technology reflected by the addition of the pestle and mortar to the mano and metate, signifying an increased emphasis on acorns as a primary food staple, as well as the introduction of the bow and arrow, pottery, obsidian from the Obsidian Butte source in Imperial County, and human cremation serve to differentiate Late Prehistoric populations from earlier people in the archaeological record. (City of San Diego 2007.)

The ethnohistoric period began locally about 1769 with the Spanish colonization of Alta California. The establishment of the mission system brought about profound changes in the lives of the Yuman-speaking Kumeyaay people. The greatest impact was felt by the Native Americans living in the coastal areas where the mission influence was the greatest. As a result ethnohistoric accounts of the coastal Kumeyaay are few and the information pertains largely to the people living in the mountain and desert regions. The ethnohistoric Kumeyaay were generally a hunting and gathering society characterized by nomadism from a central base. Their houses varied greatly according to locality, need, choice, and raw materials. Formal homes, built in winter, were small huts of poles covered with brush or bark. In cold weather, the brush was covered with earth to help conserve heat. In summer, windbreaks were all that were needed. Village-owned structures were ceremonial and were the center of many activities. Sweathouses were built and used by the Kumeyaay men. (City of San Diego 2007.)

5.7.1.2 Historic Period Resources

San Diego history can be divided into the Spanish Period (1769–1821), Mexican Period (1821–1846), and American Period (1846–Present). In spite of Juan Cabrillo’s earlier landfall on Point Loma in 1542, the Spanish colonization of Alta California did not begin until 1769 with the founding of Mission San Diego de Alcalá by Father Junípero Serra. Concerns over Russian and English interests in California motivated the Spanish government to send an expedition of soldiers, settlers, and missionaries to occupy and secure the northwestern borderlands of New Spain through the establishment of a Presidio, Mission, and Pueblo. In August 1774 the Spanish missionaries moved the Mission San Diego de Alcalá to its present location 6 miles up the San Diego River valley (modern Mission Valley) near the Kumeyaay village of Nipaguay. The initial Spanish occupation and mission system brought about profound changes in the lives of the Kumeyaay people. Substantial numbers of the coastal Kumeyaay were forcibly brought into the mission or died from introduced diseases. As early as 1791, presidio commandants in California were given the authority to grant small house lots and garden plots to soldiers and their families, and, sometime after 1800, soldiers and their families began to move down the hill near the San Diego River. (City of San Diego 2007.)

In 1822 the political situation changed as Mexico won its independence from Spain and San Diego became part of the Mexican Republic. The Mexican Government opened California to foreign trade; began issuing private land grants in the early 1820s, creating the rancho system of large agricultural estates; secularized the Spanish missions in 1833; and oversaw the rise of the civilian pueblo. By 1827, as many as 30 homes existed around the central plaza, and in 1835 Mexico granted San Diego official pueblo (town) status. At this time the town had a population of nearly 500 residents, later reaching a peak of roughly 600. The secularization in San Diego County triggered increased Native American hostilities against the Californios during the late 1830s. The attacks on outlying ranchos, along with unstable political and economic factors, helped San Diego’s population decline to around 150 permanent residents by 1840. San Diego’s official pueblo status was removed by 1838 and it was made a subprefecture of the Los Angeles pueblo. The Native American population continued to

decline, as Mexican occupation brought about continued displacement and acculturation of Native American populations. (City of San Diego 2007.)

The American Period began in 1846 when United States military forces occupied San Diego. The Americans assumed formal control with the Treaty of Guadalupe Hidalgo in 1848 and introduced Anglo culture and society, American political institutions, and especially American entrepreneurial commerce. In 1850, the Americanization of San Diego began to develop rapidly. On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850, for county officers. San Diego grew slowly during the next decade. (City of San Diego 2007.)

After a series of struggles, San Diego began to develop fully into an active American town with the arrival of land speculator and developer Alonzo Horton in 1867. Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Development spread from downtown to the areas of Golden Hill, Banker's Hill, and Sherman Heights, followed by Greater North Park, Mission Hills, and the La Jolla area by the early 1900s. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots. (City of San Diego 2007.)

5.7.1.3 Project Site Conditions

The Area of Potential Effects (APE) is a geographic area within which a project may cause changes in the character or use of historical or tribal cultural resources. The project APE consists of the approximately 2-acre project site, which is identified on Figure 3-1 in Chapter 3, *Project Description*. A cultural resources study was conducted as part of the Quarry Falls PEIR and included investigation within the project APE (ASM Affiliates, Inc. 2006). This study consisted of a review of relevant site records and cultural resources reports on file at the South Coastal Information Center (SCIC), as well as an intensive pedestrian survey of the APE and consultation with Native Americans. There are no structures within the project site.

The records search indicated that no previously recorded historical resources are located within the project APE. Records also indicated that the project site had been completely surveyed 25 years ago and that no resources were located as a result of that survey. The field survey consisted of walking transects spaced at 15-meter intervals, while examining the ground for artifacts or other evidence of human activity greater than 50 years old. Because the majority of the project site had been previously disturbed, the field survey focused on the undeveloped area along the north edge of the project site. No historical resources were identified during the field survey. However, the cultural resources study stated that the APE is within an area of high sensitivity for historical resources.

The Native American Heritage Commission (NAHC) was contacted on February 2, 2005, and provided a list of Native American representatives who were identified as potentially having knowledge of historical resources in the APE (ASM Affiliates, Inc. 2006). Letters were sent on February 18, 2005, and follow-up telephone calls were placed to these contacts on March 2, 2005. No responses were received.

A supplemental records search was conducted by qualified City of San Diego staff to determine if any new sites or resources had been identified since the initial studies were conducted for the Quarry

Falls project in 2005 and 2006. One new archaeological site (P-37-034472) was recorded in the vicinity of the project site during monitoring for the Quarry Falls project (ASM Affiliates, Inc. 2013, 2015), and one previously recorded site (P-37-018407/CA-SDI-15600) was updated in December 2012 in conjunction with the survey of an existing power line for San Diego Gas and Electric Company (ASM Affiliates, Inc. 2013).

An informal tribal consultation was conducted pursuant to Assembly Bill 52 by qualified City staff for the current project in 2016 to determine if new information was available regarding potential tribal cultural resources within the project APE. No new information was provided.

5.7.2 Regulatory Framework

5.7.2.1 Federal

The National Historic Preservation Act, enacted in 1966, established the National Register of Historic Places (NRHP), authorized funding for state programs with participation by local governments, created the Advisory Council on Historic Preservation, and established a review process for protecting cultural resources. The National Historic Preservation Act provides the legal framework for most state and local preservation laws. The NRHP is the nation's official list of cultural resources worthy of preservation. It is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archaeological resources.

Other federal historic preservation legislation that provide a legal environment for documentation, evaluation, and protection of cultural resources that may be affected by federal undertakings, or by private undertakings operating under federal license, with federal funding, or on federally managed lands, include: the Archaeological and Historic Preservation Act of 1974; Native American Graves Protection and Repatriation Act (NAGPRA); Archaeological Resource Protection Act, as amended; and Executive Order 11593.

5.7.2.2 State

California Environmental Quality Act

CEQA uses the term *historical resources* to include significant prehistoric (or archaeological) and historic sites, buildings, structures, objects, and districts or landscapes. Prehistoric resources date from before the onset of the Spanish Colonial period (1769 through 1848), and historic resources date from after the onset of the Spanish Colonial period. Built environment resources typically refer to historic structures that are above ground. Historical resources also include traditional cultural properties, which are locations with enduring significance to the beliefs, customs, and/or practices of living communities (Parker and King 1990). It is important to note that the different kinds of historical resources described above may not be mutually exclusive. Historic buildings, structures, and/or objects are frequently associated with archaeological sites. Similarly, archaeological sites may also comprise traditional cultural properties for the Native American community.

According to CEQA, historical resources include: resources listed in or determined eligible for listing on the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements; and any object, building, structure, site, area, place, record, or manuscript that a Lead

Agency determines to be historically significant.¹ CEQA also provides a definition for a *unique archaeological resource*: an archaeological artifact, object, or site that contains information needed to answer important scientific research questions; has a special and particular quality; or is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2). A project that affects historical resources (including unique archaeological resources) is one that has a significant effect on the environment.

Assembly Bill 52 established a consultation process with all California Native American Tribes on the NAHC list and codified this process within the CEQA statute (Section 20174 of the PRC). It also defines tribal cultural resources, as excerpted below.

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) In addition, a cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision.

California Register of Historical Resources

The CRHR is the official state listing of historical resources that are worthy of preservation, and is maintained by the State Historic Preservation Officer. Properties listed or eligible for listing on the NRHP are nominated and selected to be listed on the CRHR. Any resource eligible for the NRHP is also automatically eligible for the CRHR (PRC Section 5020 et seq.).

Similar to the NRHP, a historical resource may be considered significant by CEQA if it meets any of the following criteria for listing on the CRHR (PRC Section 5024.1).

¹ A resource that is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA (Section 15064.5 and CEQA Statutes Section 21083.2).

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. It is associated with the lives of persons important to California's past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded or may be likely to yield information important in prehistory or history.

California Health and Safety Code and California Native American Graves Repatriation Act

Human remains are sometimes associated with archaeological sites. According to CEQA, "archaeological sites known to contain human remains shall be treated in accordance with the provisions of the Health and Safety Code" (Section 7050.5). In addition, the California NAGPRA of 2001 is consistent with the federal NAGPRA and was enacted to ensure that all California Native American human remains and cultural items be treated with dignity and respect. The protection of human remains is also ensured by sections of the California PRC, as detailed below.

California Public Resources Code

In addition to the previously stated definitions codified in the CEQA statute, the PRC includes other regulations applicable to the project.

PRC Section 5097.5 states that a person shall not knowingly excavate, harm, or destroy any historic or prehistoric ruins or sites on public lands, unless granted permission by the public agency that has jurisdiction over those lands. Violations are classified as a misdemeanor, punishable by fine and/or imprisonment. The section outlines the specific parameters of addressing the violation.

PRC Section 5097.9 states consultation with the NAHC is required whenever Native American graves are found. Pursuant to Health and Safety Code (HSC) subdivision c of Section 7050.5, when the NAHC is notified of human remains, it shall immediately notify those persons it believes to be the Most Likely Descendants (MLDs). Section 5097.98 1(b) states:

"Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment."

It also states possible preferences the MLD may have for treatments, including preservation in place, nondestructive removal and analysis, relinquishment to the MLD, or other appropriate treatment.

PRC Section 622.5 establishes that any person, who is not the owner thereof, who willfully injures, disfigures, defaces, or destroys an object of archaeological or historical value on private or public lands is guilty of a misdemeanor.

5.7.2.3 Local

General Plan

The City's General Plan contains 10 elements that provide a comprehensive slate of citywide policies and further the City of Villages smart growth strategy for growth and development (City of San Diego 2016b). The Historic Preservation Element was developed to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources; improve the quality of the built environment; encourage appreciation for the City's history and culture; maintain the character and identity of communities; and contribute to the City's economic vitality through historic preservation (City of San Diego 2008). The Historic Preservation Element includes goals and policies to achieve this mission.

Goals and policies identified in the Historic Preservation Element include: identifying and preserving historical resources; integrating historic preservation planning in the larger planning process; strengthening historic preservation planning; fostering relationships with the Kumeyaay/Diegueno tribes; fostering greater public participation and education in historical resources; increasing opportunities for cultural heritage tourism; and promoting the maintenance, restoration, and rehabilitation of historical resources (City of San Diego 2008).

Municipal Code: Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations (Regulations), part of the City's Municipal Code (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201–143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, State, and federal policies and mandates.

Included in these are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

The Historical Resources Guidelines of the Land Development Manual (City of San Diego 2001) are incorporated in the Municipal Code by reference. These guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Regulations and the determination of impacts and mitigation under CEQA. Compliance with the Regulations begins with the determination of the need for a site-specific survey for a project. Section 143.0212(b) of the Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing archaeological sites. These maps are based on records maintained by the SCIC of the California Historic Resources Information System and San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey.

In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association. Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Historical Resources Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

Tribal cultural resources are not explicitly addressed in the guidelines, but are considered during the environmental review process at the same time as archaeological resources are being evaluated using similar data sources and information provided by the local tribal representative in accordance with the City's Assembly Bill 52 project notification process.

City of San Diego Register of Historical Resources

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated a historical resource within the City of San Diego's Register of Historical Resources by the City's Historical Resources Board if it meets one or more the following designation criteria (City of San Diego 2008).

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

5.7.3 Significance Determination Thresholds

5.7.3.1 Issue Questions

As identified in the City's Significance Determination Thresholds (2016a), a project would result in a significant impact related to historical and tribal cultural resources if it results in any of the following.

1. An alteration to a historical resource, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site;
2. Any impact on existing religious or sacred uses within the potential impact area;
3. A substantial adverse change in the significance of a Tribal Cultural Resource; or
4. The disturbance of any human remains, including those interred outside of formal cemeteries.

5.7.4 Impact Analysis

Issues 1–3: Historical Resource, Sacred/Religious Use, Tribal Cultural Resource

Would the project result in (1) an alteration, including adverse physical or aesthetic effects, and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site; (2) any impact on existing religious or sacred uses within the potential impact area; or (3) a substantial adverse change in the significance of a Tribal Cultural Resource?

5.7.4.1 Impact Discussion

There are no buildings or above-ground structures within the project site, and no historical resources or religious or sacred uses were identified within the APE during the cultural resources study conducted by ASM Affiliates, Inc. in 2006. Additionally, Native American representatives did not provide locations of existing religious or sacred uses when contacted as part of the informal outreach process during the cultural resources survey efforts at that time (ASM Affiliates, Inc. 2006).

As part of the current project analysis, an updated records and literature search was conducted to supplement the prior work effort and to determine if new information was available regarding the potential for resources to be encountered within the project site. The record search provided information associated with two monitoring efforts conducted by ASM Affiliates, Inc. for the Quarry Falls project and one archaeological site (approximately one quarter mile to the east) that was updated during surveys associated with a San Diego Gas and Electric project in 2012.

Archaeological and Native American monitoring was conducted in one portion of the Quarry Falls site in proximity to the current project site in 2013, with negative results. Another monitoring effort was conducted in 2013 for another portion of the Quarry Falls project site, resulting in the recordation of one new site (P-37-034472/CA-SDI-21506), consisting of a dispersed artifact scatter. Excavation of four shovel test pits was conducted within the site area, terminating into formational stratum with no subsurface archaeological component. The site was recommended as not significant or eligible to the City of San Diego's Register of Historic Resources or the CRHR. The entire area of that project was graded to below the Prehistoric occupation level and the recorded site was removed. No additional features or cultural resources were identified and no additional archaeological work was recommended for that project.

As previously detailed in Section 5.7.1.3, informal tribal outreach was conducted pursuant to Assembly Bill 52 by City staff for the current project in 2016 in order to determine the potential for any tribal cultural resources (sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe) within the APE. Information from the updated records search and negative monitoring results report was discussed; however, no tribal cultural resources were identified during this informal consultation process. The project site is not

located within an area of high sensitivity for archaeological resources; however, a portion of the project site is within an area of the former Quarry Falls site that had not undergone mining and is relatively undisturbed, and there is a potential for encountering additional lithic artifacts in the undisturbed project footprint. Therefore, the proposed project would have the potential to result in an alteration to subsurface archaeological or tribal cultural resources during construction of the roadway. Impacts would be significant and mitigation is required.

Impacts during operation are not anticipated, as the project site would be constructed and paved as a roadway. Therefore, impacts associated with operation of the proposed project would be less than significant.

5.7.4.2 Significance of Impacts

Although no historical (archaeological) or tribal cultural resources were identified within the APE, the project would have the potential to disturb or alter subsurface resources during construction-related activities. Therefore, impacts would be significant and mitigation is required.

5.7.4.3 Mitigation Measures

MM-HIST-1: Subsurface Archaeological and Tribal Cultural Resources

I. Prior to Permit Issuance (for projects that include ground disturbance)

A. Entitlements Plan Check

1. Prior to issuance of any construction permits including, but not limited to, the first Grading Permit, Demolition Plans/Permits, and Building Plans/Permits, but prior to the first preconstruction (precon) meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for archaeological monitoring and Native American (Kumeyaay) monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification Have Been Submitted to ADD

1. The project's cultural resources consultant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines. If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour Hazardous Waste Operations and Emergency Response training with certification documentation.
2. MMC would provide a letter to the project's cultural resources consultant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the Historical Resources Guidelines.
3. Prior to the start of work, the project's cultural resources must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from SCIC, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
 3. The PI may submit a detailed letter to MMC requesting a reduction to the quarter-mile radius.
- B. PI Shall Attend Precon Meetings
1. Prior to beginning any work that requires monitoring; the City shall arrange a precon meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American monitor shall attend any grading/excavation-related precon meetings to make comments and/or suggestions concerning the archaeological monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the precon meeting, the City shall schedule a focused precon meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.
 2. Identify Areas to Be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American (Kumeyaay) consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11 inches x 17 inches) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring would occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents that indicate site conditions such as depth of excavation and/or site graded to bedrock, etc. that may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor(s) Shall Be Present during Grading/Excavation/Trenching
1. The Archaeological Monitor shall be present full time during all soil-disturbing and grading/excavation/trenching activities that could result in impacts on archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain

circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.

2. Native American (Kumeyaay) consultant/monitor shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American (Kumeyaay) consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Sections III.B–C and IV.A–D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition—such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or encountering of native soils—that may reduce or increase the potential for resources to be present occurs.
4. The Archaeological Monitor and Native American (Kumeyaay) consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed or emailed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil-disturbing activities including, but not limited to, digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American (Kumeyaay) consultant/monitor, where Native American resources are discovered, shall evaluate the significance of the resource. If human remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program that has been reviewed by the Native American (Kumeyaay) consultant/monitor, and obtain written approval from MMC. Impacts on significant resources must be mitigated before ground-disturbing activities in the area of discovery would be allowed to resume. Note: If a unique archaeological site is also a historical resource as defined in CEQA, then the limits on the amount(s) that the project may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

- c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts would be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off site until a determination can be made regarding the provenance of the human remains, and the following procedures as set forth in CEQA Section 15064.5(e), California PRC (Section 5097.98), and State HSC (Section 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC would notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate Discovery Site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, would determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner would determine with input from the PI whether the remains are, or are most likely to be, of Native American origin.

C. If Human Remains Are Determined to Be Native American

1. The Medical Examiner would notify the NAHC within 24 hours. By law, only the Medical Examiner can make this call.
2. The NAHC would immediately identify the person or persons determined to be the MLD and provide contact information.
3. The MLD would contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California PRC, and HSC.
4. The MLD would have 48 hours to make recommendations to the City or representative for the treatment or disposition, with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American human remains would be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, or the MLD failed to make a recommendation within 48 hours after being notified by the Commission, or;
 - b. The City or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the City, then,
 - c. In order to protect these sites, the City shall do one or more of the following:
 - 1) Record the site with the NAHC;

- 2) Record an open space or conservation easement on the site; or
 - 3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground-disturbing land development activity, the City may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures, the human remains and cultural materials buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- D. If Human Remains Are Not Native American
1. The PI shall contact the Medical Examiner with notification of the historic era context of the burial.
 2. The Medical Examiner would determine the appropriate course of action with the PI and City staff (PRC 5097.98).
 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for interment of the human remains shall be made in consultation with MMC, EAS, any known descendant group, and the San Diego Museum of Man.
- V. Night and/or Weekend Work
- A. If Night and/or Weekend Work Is Included in the Contract
1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries
In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax or email by 8 a.m. of the next business day.
 - b. Discoveries
All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Sections III – During Construction and IV – Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If Night and/or Weekend Work Becomes Necessary during the Course of Construction
1. The CM shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All Other Procedures Described Above Shall Apply, as Appropriate

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines, that describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results, or other complex issues, a schedule shall be submitted to MMC establishing agreed-upon due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation (DPR)
 - c. The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the SCIC with the Final Monitoring Report.
2. MMC shall return the Draft Monitoring Report to the PI for revision or for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of Artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing, and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American (Kumeyaay) representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American (Kumeyaay) consultant/monitor indicating that Native American

resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC that includes the Acceptance Verification from the curation institution.

5.7.4.4 Significance After Mitigation

Implementation of **MM-HIST-1** would reduce impacts related to historical and tribal cultural resources to less-than-significant levels because the recommended monitoring of any ground-disturbing activities on the project site would minimize the potential to damage, or result in the loss of, unknown subsurface archaeological or tribal cultural resources.

5.7.5 Impact Analysis

Issue 4: Human Remains

Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.7.5.1 Impact Discussion

The APE is not located on a known or formal cemetery, and no historical resources, including evidence of human remains, were identified during the cultural resources study. In the highly unlikely event of such discovery, compliance with existing state laws, including those previously detailed in Section 5.7.2, *Regulatory Framework*, and also set forth in **MM-HIST-1**, would ensure that human remains would not be disturbed. As previously detailed in **MM-HIST-1**, if human remains are discovered, work would halt in that area and no soil would be exported off site until a determination could be made regarding the provenance of the human remains, and the procedures set forth in CEQA Section 15064.5(e), California PRC Section 5097.98, and HSC Section 7050.5 would be followed. Impacts during operation are not anticipated, as the project site would be constructed and paved as a roadway.

5.7.5.2 Significance of Impacts

Construction activities are not expected to disturb human remains. In the unlikely event of discovery, compliance with existing state laws set forth in **MM-HIST-1** would be required, including relevant sections of the California PRC and HSC.

5.7.5.3 Mitigation Measures

The proposed project would be required to comply with **MM-HIST-1**.

5.7.5.4 Significance After Mitigation

Implementation of **MM-HIST-1** would reduce impacts related to human remains to less-than-significant levels because the recommended monitoring of any ground-disturbing activities on the project site would minimize the potential to damage, or result in the loss of, previously undisturbed human remains.

5.8 Hydrology and Water Quality

This section describes the existing conditions and applicable laws and regulations for hydrology and water quality, followed by an analysis of the proposed project's potential to increase runoff, significantly alter drainage patterns, violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality. As described in Chapter 1, *Introduction*, the Quarry Falls PEIR is incorporated by reference within this DEIR. Although excerpts from the Quarry Falls PEIR are replicated and cited in parts within this section, readers are encouraged to review Sections 5.9, *Hydrology*, and 5.13, *Water Quality*, of that PEIR for the complete analysis that pertains to that development.

5.8.1 Existing Conditions

5.8.1.1 Hydrology

Hydrologic Characteristics

The project site is located within the San Diego River Watershed Management Area. With a land area of approximately 440 square miles, the San Diego River watershed is the second largest hydrologic unit in San Diego County. It also has the highest population of the County's watersheds and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee and several unincorporated jurisdictions. Hydrologic units are further subdivided for planning purposes. As shown in Figure 5.8-1, the project site is within the Mission San Diego Hydrologic Subarea (907.11) of the Lower San Diego Hydrologic Area (907.10), which is located within the San Diego Hydrologic Unit (907.00). The Mission San Diego Hydrologic Subarea encompasses approximately 37,000 acres. Annual precipitation ranges from less than 11 inches at the coast to about 35 inches around the Cuyamaca and El Capitan Reservoirs.

Soils and Geologic Formations

Five surficial soil types and one geologic formation underlie the project site. The surficial deposits consist of compacted fill, undocumented fill, topsoil, and alluvium, and the geologic formation is Terrace Deposits underlain by Stadium Conglomerate.

Soils are typically classified by the Natural Resource Conservation Service into four hydrologic soil groups of A, B, C, and D based on the soil's runoff potential. Group A generally has the smallest runoff potential and Group D the greatest. The soil at the project site is classified in Group D, having a high runoff potential.

Stormwater

The project site receives stormwater run-on that is discharged from areas of higher elevation to the north, east, and west. The drainage tributary areas contributing to run-on that discharges onto the area are composed of four offsite basins, as depicted on Figure 5.8-2. This figure also shows the general flow path of each of these basins, as well as the existing stormwater flow path on the area.

Run-on generated from the offsite basin and runoff generated on the area flows toward the south and enters the adjacent Quarry Falls site, which then drains toward an existing storm drain system to the San Diego River, as shown in Figure 5.8-2. Stormwater from the Quarry Falls site is handled by two main storm drain systems.

- **West Storm Drain System** – Consists of a 7- by 7-foot box culvert located under Friars Road near the southwest corner of the Quarry Falls site. This box culvert conveys stormwater through an open channel to a second 6- by 5-foot box culvert that discharges stormwater into the San Diego River.
- **East Storm Drain System** – Consists of a 24-inch storm drain located under the intersection of Friars Road and Qualcomm Way near the southeast corner of the Quarry Falls site. This 24-inch storm drain expands to a 36-inch storm drain before discharging stormwater into the San Diego River.

5.8.1.2 Water Resources

Surface Water

The San Diego region has 13 principal stream systems originating in the western highlands that flow to the Pacific Ocean. Most of the streams of the San Diego region are interrupted in character, having both perennial and ephemeral components due to the rainfall pattern and the development of surface water impoundments. As previously described, the project site is located within the Mission San Diego Hydrologic Subarea (907.11) of the Lower San Diego Hydrologic Area (907.10), which is located within the San Diego Hydrologic Unit (907.00). According to the Water Quality Control Plan for the San Diego Basin (Basin Plan; San Diego RWQCB 1994), the nearest surface water resource to the project site is the Lower San Diego River, approximately 0.7 mile to the south.

Flooding

The Federal Emergency Management Agency (FEMA) provides all floodplain information through the publication of Flood Insurance Rate Maps. All Flood Insurance Rate Maps delineate the location of 100- and 500-year floodplains. Based on these maps, the project site is not located within a 100- or 500-year floodplain.

Groundwater

A groundwater basin is defined as a hydrogeologic unit containing one large aquifer as well as several connected and interrelated aquifers. The project site is located adjacent to the 11.5-square-mile Mission Valley Groundwater Basin. Drained by the San Diego River, this basin underlies an east-west-trending valley and is bound by lower permeability San Diego, Poway, and Lindavista Formations. The principal water-bearing deposit is alluvium consisting of medium- to coarse-grained sand and gravel.

The exact depth to groundwater at the project site is unknown. Review of water-level data available from former monitoring wells located at the Vulcan Materials fuel dispensing area approximately 2,700 feet southwest of the project site indicates a depth to groundwater of 30 feet below ground surface measured in 2003. A review of water-level data by Geocon Inc. for wells in the vicinity of the Quarry Falls site indicates that groundwater ranges from 30 to 65 feet below ground surface. Groundwater is expected to occur deeper than 30 feet at the area, but perched groundwater may be

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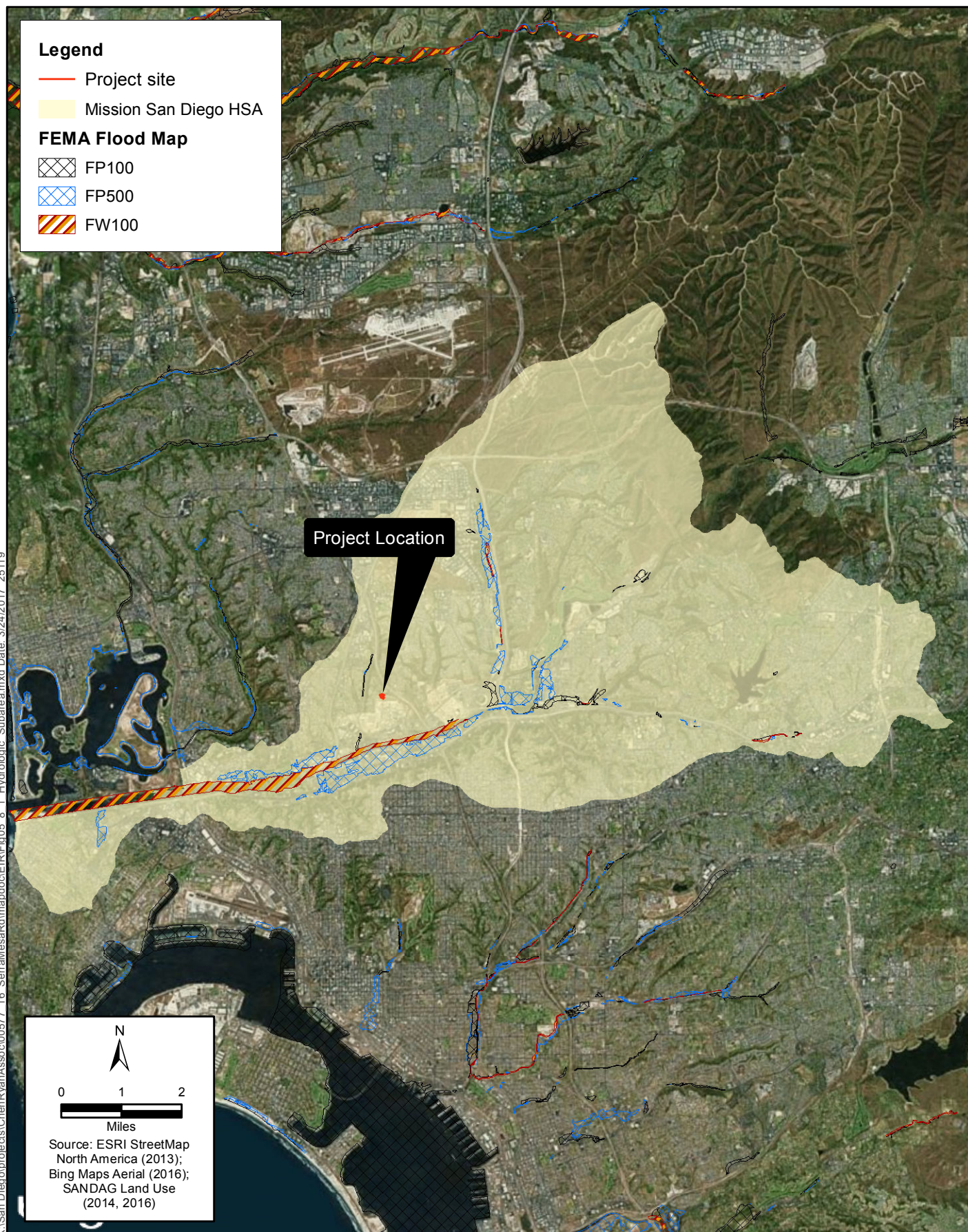
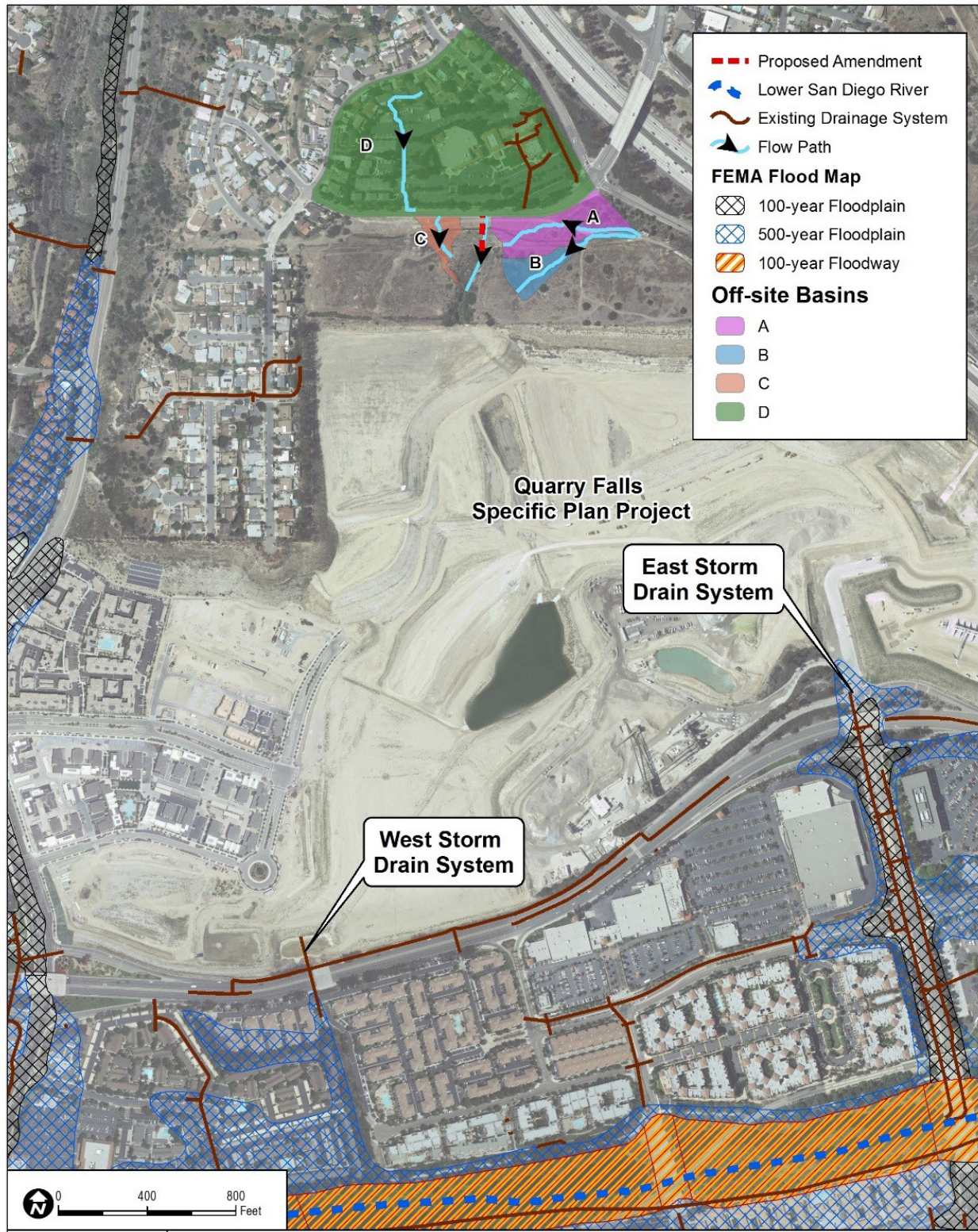


Figure 5.8-1
Hydrologic Subarea



Source: City of San Diego, 2016.

**Figure 5.8-2
Drainage Overview**

encountered near the water level within the existing drainage channel located on and immediately west of the area. Seasonal fluctuations of onsite groundwater conditions are assumed.

Water Quality

Stormwater that accumulates on impervious surfaces, such as parking lots, rooftops, and streets, drains directly and indirectly to waters of the United States. The City's stormwater conveyance system is separate from the sanitary sewer system and therefore does not receive any treatment prior to being discharged into streams, bays, and the ocean. The primary pollutants of concern in urban runoff are sediments, nutrients, heavy metals, organic compounds, trash and debris, oils, bacteria, and pesticides. Construction-related pollutants include sediment, concrete, paints and solvents, and hazardous materials associated with operation and maintenance of heavy equipment. Water quality is affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants (point-source pollution). As land is developed, the new impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (nonpoint-source pollution) into adjacent watersheds.

The Lower San Diego River is designated as water quality limited segment for indicator bacteria pursuant to Clean Water Act (CWA) Section 303(d). Total maximum daily loads have been adopted to address these impairments. Groundwater quality in the Mission Valley Groundwater Basin is variable, with reported total dissolved solids (TDS) concentrations of 500 to 3,000 milligrams per liter. Impairments to groundwater include magnesium and sulfate, which are high for domestic use. In addition, chloride and TDS concentrations are high for domestic and irrigation use.

In the Basin Plan (San Diego RWQCB 1994), beneficial uses are defined as the uses of water necessary for the survival or well-being of humans, plants, and wildlife. The San Diego River and the groundwater in the Mission San Diego Hydraulic Subarea have been assigned beneficial uses in the Basin Plan in order to comply with the California Water Code and the federal CWA. The San Diego River has been assigned the beneficial uses of agricultural supply; industrial service supply; contact water recreation; non-contact water recreation; preservation of biological habitats of special significance; warm freshwater habitat; wildlife habitat; and rare, threatened, or endangered species habitat. The groundwater in the Mission San Diego Hydraulic Subarea has been assigned the potential beneficial use for municipal and domestic supply as well as the existing beneficial uses of agricultural supply, industrial service supply, and industrial process supply.

5.8.2 Regulatory Framework

Several federal, state, and local regulations govern discharges associated with construction and post-construction stormwater runoff to protect the water quality of receiving waters. The following is a summary of the regulatory framework that has been established to protect water resources.

5.8.2.1 Federal

Clean Water Act

The federal CWA of 1972 (United States Code, Title 33, Section 1251 et seq.) was designed to restore and maintain the chemical, physical, and biological integrity of waters of the United States. The CWA directs states to establish water quality standards for all waters of the United States and to review and update such standards every 3 years. The U.S. Environmental Protection Agency (EPA) has

delegated responsibility for implementation of portions of the CWA to the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs), including water quality control planning and control programs. Applicable CWA sections include the following.

Section 208

Section 208 of the CWA requires all states to assess damages to water quality from nonpoint source pollution and to develop either regulatory or non-regulatory programs to control the pollution. The state's Section 208 program must meet EPA approval.

Section 303

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Section 304(a) requires EPA to publish water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numerical, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Section 303(c)(2)(b) of the CWA requires states to adopt numerical water quality standards for toxic pollutants for which EPA has published water quality criteria and which reasonably could be expected to interfere with designated uses of a water body.

Under Section 303(d) of the CWA, SWRCB is required to develop a list of water quality limited segments for jurisdictional waters of the United States. The waters on the list do not meet water quality standards; therefore, the RWQCBs are required to establish priority rankings and develop action plans, called Total Maximum Daily Loads (TMDL), to improve water quality. A TMDL is a calculation of the maximum amount of a specific pollutant that a water body can receive and still meet federal water quality standards as provided in the CWA. TMDLs account for all sources of pollution, including point sources, nonpoint sources, and natural background sources. The CWA Section 303(d) list of impaired water bodies provides a prioritization and schedule for development of TMDLs for states. SWRCB, in compliance with CWA Section 303(d), publishes the list of water quality-limited segments in California, which includes a priority schedule for development of TMDLs for each contaminant or "stressor" affecting the water body.

Section 401

Every applicant for a federal permit or license for any activity that may result in a discharge to a water body must obtain a Section 401 Water Quality Certification for the proposed activity and must comply with state water quality standards prescribed in the certification. In California, these certifications are issued by SWRCB under the auspices of nine RWQCBs. Most certifications are issued in connection with CWA Section 404 U.S. Army Corps of Engineers (USACE) permits for dredge and fill discharges.

Section 402

Section 402(p) of the CWA was amended in 1987 to require EPA to establish regulations for permitting of municipal and industrial (including active construction sites) stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. EPA published final regulations for industrial and municipal stormwater discharges on November 16, 1990. The

NPDES program requires certain industrial facilities and municipalities of a certain size that discharge pollutants into waters of the United States to obtain a permit. Stormwater discharges in California are commonly regulated through general and individual NPDES permits, which are adopted by SWRCB or the RWQCBs and are administered by the RWQCBs. EPA requires NPDES permits to be revised to incorporate waste-load allocations for TMDLs when the TMDLs are approved (Code of Federal Regulations, Title 40, Section 122).

Section 404

This section establishes a permit program administered by USACE that regulates the discharge of dredged materials into waters of the United States, including wetlands. Activities in waters of the United States that are regulated under this program include fills for development, water resource projects, infrastructure development, and conversion of wetlands to uplands for farming and forestry. CWA Section 404 permits are issued by USACE. There are no wetlands on the project site.

National Flood Insurance Act

The National Flood Insurance Act of 1968 established the National Flood Insurance Program, a federal program administered by FEMA. It enables individuals who have property within the 100-year floodplain to purchase insurance against flood losses. The project site is not within a 100-year floodplain.

5.8.2.2 State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code, Division 7, 13000 et seq.) authorizes SWRCB to adopt, review, and revise policies for all “waters of the State” (including both surface water and groundwater) and directs the RWQCB to develop regional basin plans. Section 13170 of the California Water Code also authorizes SWRCB to adopt water quality control plans on its own initiative. The San Diego Basin Plan (San Diego RWQCB 1994) is designed to preserve and enhance the quality of water resources in the San Diego region for the benefit of present and future generations. The purpose of the Basin Plan is to designate beneficial uses of the region’s surface water and groundwater, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives.

All projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of Waste Discharge Requirements (WDRs) from the RWQCBs. Land- and groundwater-related WDRs (i.e., non-NPDES WDRs) regulate discharges of process and wash-down wastewater and privately or publicly treated domestic wastewater. WDRs for discharges to surface waters also serve as NPDES permits. These regulations are applicable to the project.

State Antidegradation Policy

The state’s Antidegradation Policy restricts degradation of surface and ground waters. This policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. It establishes three conditions that must be met before the quality of high-quality waters may be lowered by waste discharges. The state must determine that lowering the quality of high-quality waters: (1) will be consistent with the maximum benefit to the people of the state; (2) will not

unreasonably affect present and anticipated beneficial uses of such water; and (3) will not result in water quality less than that prescribed in state policies.

Construction General Permit

Pursuant to CWA Section 402(p) and as related to the goals of the Porter-Cologne Water Quality Control Act, SWRCB has issued a statewide NPDES General Permit for Stormwater Discharges Associated with Construction Activity (Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Order 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit), adopted September 2, 2009 (SWRCB 2012). Every construction project that disturbs 1 or more acres of land surface or that is part of a common plan of development or sale that disturbs more than 1 acre of land surface would require coverage under this Construction General Permit. Construction activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of at least 1 acre of total land area. To obtain coverage under this Construction General Permit, the landowner or other applicable entity must file Permit Registration Documents prior to the commencement of construction activity, which include a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) prepared by a Qualified SWPPP Developer, and mail the appropriate permit fee to SWRCB.

The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and (2) to describe and ensure the implementation of best management practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. BMPs are intended to reduce impacts to the maximum extent practicable (MEP), which is a standard created by Congress to allow regulators the flexibility necessary to tailor programs to the site-specific nature of municipal stormwater discharges. The SWPPP is required to be implemented and monitored regularly by a Qualified SWPPP Practitioner. Reducing impacts to the MEP generally relies on BMPs that emphasize pollution prevention and source control, with additional structural controls as needed. The Construction General Permit requires that specific minimum BMPs be incorporated into the SWPPP, depending on the project's sediment risk to receiving waters based on the project's erosion potential and receiving water sensitivity to sediment.

Municipal Storm Water Permit

CWA Section 402 mandates permits for municipal stormwater discharges, which are regulated under the NPDES General Permit for Municipal Separate Storm Sewer Systems (MS4 Permit). Phase I MS4 Permit regulations cover medium (serving between 100,000 and 250,000 people) and large (serving more than 250,000 people) municipalities. Phase II (Small MS4 Permit) regulations require that stormwater management plans/programs be developed by municipalities with populations smaller than 100,000, including non-traditional Small MS4s, which are facilities such as military bases, public campuses, and prison and hospital complexes.

MS4 Permits require that cities and counties develop and implement programs and measures, including BMPs, control techniques, system design and engineering methods, and other measures as appropriate, to reduce the discharge of pollutants in stormwater to the maximum extent possible. As part of permit compliance, these permit holders have created stormwater management plans for their respective locations. These plans outline the requirements for municipal operations, industrial and commercial businesses, construction sites, and planning and land development. These

requirements may include multiple measures to control pollutants in stormwater discharge. During implementation of specific projects under the program, project applicants are required to follow the guidance contained in the stormwater management plans as defined by the permit holder in that location.

SWRCB is advancing Low-Impact Development (LID) in California as a means of complying with municipal stormwater permits. LID incorporates site design, including among other things the use of vegetated swales and retention basins and minimization of impermeable surfaces, to manage stormwater to maintain a site's predevelopment runoff rates and volumes.

5.8.2.3 Local

San Diego Integrated Regional Water Management Plan

The 2013 San Diego Integrated Regional Water Management Plan was prepared under the direction of a Regional Water Management Group consisting of the San Diego County Water Authority, the County of San Diego, and the City of San Diego. The Integrated Regional Water Management Plan builds on local water and regional management plans within the San Diego region and is aimed at developing long-term water supply reliability, improving water quality, and protecting natural resources. The primary goals of the plan are to protect and enhance water quality, protect and enhance our watersheds and natural resources, and to promote and support sustainable integrated water resource management.

Dewatering Permit

Discharges from specified groundwater extraction activities (such as construction dewatering) must be permitted either by the San Diego RWQCB under the General Order R9-2015-0013 for groundwater waste discharges to surface waters or authorized by the agency with jurisdiction if discharged to a municipal separate storm sewer system (MS4). Discharge is required to meet applicable constituent limitations and pre-treatment requirements.

Water Quality Control Plan for the San Diego Basin

As previously described, the Porter-Cologne Act requires that RWQCBs adopt water quality control plans for watersheds within their jurisdictions. These plans establish water quality standards for particular surface water bodies and groundwater resources.

The San Diego RWQCB (Region 9) is responsible for the Basin Plan (San Diego RWQCB 1994). It sets forth water quality objectives for constituents that could cause an adverse effect or impact on the beneficial uses of water. Specifically, the San Diego Basin Plan is designed to accomplish the following.

- Designate beneficial uses for surface water and groundwater.
- Set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses.
- Describe implementation programs to protect the beneficial uses of all waters within the region.
- Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies.

San Diego Regional Municipal Stormwater Permit

The San Diego Regional Municipal Stormwater Permit (Order R9-2013-0001 [as amended by Order R9-2015-0001]) (Municipal Permit) regulates the conditions under which stormwater and non-stormwater discharges into and from MS4s are prohibited or limited. There are numerous jurisdictions that are covered under the Municipal Permit, including 18 cities, the County of San Diego, the San Diego Regional Airport Authority, and the San Diego Unified Port District, also known as the co-permittees. Each owns or operates an MS4, through which it discharges stormwater and non-stormwater into waters of the United States within the region.

The co-permittees are subject to the requirements of the Municipal Permit. The Municipal Permit establishes prohibitions and limitations with the goal of protecting water quality and designated beneficial uses of waters of the United States from adverse impacts caused by or contributed to by MS4 discharges. The Municipal Permit requires that each co-permittee implement a Jurisdictional Urban Runoff Management Program (JURMP) to control the contribution of pollutants to and the discharges from the MS4. The goal of the JURMPs is to implement water quality improvement strategies and runoff management programs that effectively prohibit non-stormwater discharges into the MS4s and reduce pollutants in discharges from the co-permittees' MS4s to the maximum extent practicable.

The Municipal Permit also requires that the co-permittees collectively develop a Water Quality Improvement Plan (WQIP) for each of 10 Watershed Management Areas in the region. These plans identify the highest priority water quality conditions within each watershed and specific goals, strategies, and schedules to address those priorities, including numeric goals and action levels, and requirements for water quality monitoring and assessment. The co-permittees are required to implement strategies through their JURMPs to achieve the goals of the WQIPs. The San Diego River WQIP applies to the project, which is detailed below.

The co-permittees developed the *County of San Diego BMP Design Manual* (County of San Diego 2016), which provides procedures for planning, selecting, and designing onsite structural BMPs for new development and significant redevelopment projects in accordance with Municipal Permit requirements. The *BMP Design Manual* became effective on February 26, 2016, and requires all projects to implement source-control BMPs to address specific sources of pollutants and apply site design BMPs to the development site.

As the project would qualify as a Priority Development Project (PDP), stormwater pollutant control BMPs must be implemented and meet the following performance standards.

1. Retain onsite the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event by infiltration, evaporation, evapotranspiration, or harvest and reuse, and
 - a. Treat the remaining volume infeasible to retain on-site through biofiltration, and
 - b. Treat the remaining volume infeasible to treat through biofiltration with flow-through treatment control BMPs and participate in alternative compliance methods to mitigate for the pollutants not being retained on site.
2. Or, the project may be allowed to participate in an alternative compliance program in lieu of fully complying with the onsite performance standards if such a program is available in the jurisdiction of the project. Flow-through treatment control BMPs would also need to be implemented on site.

Under the Municipal Permit, co-permittees are required to implement stormwater management requirements and controls, which include requirements for stormwater BMPs during construction and post-construction, including implementing LID BMPs for development and significant redevelopment to reduce pollutants in stormwater runoff from sites through more natural processes such as infiltration and biofiltration. The *BMP Design Manual* (County of San Diego 2016) provides guidance for the BMP selection process. Design techniques include minimizing impervious areas, conserving natural areas, and utilizing vegetation and landscaping for water quality treatment benefits. Co-permittees are also required to comply with hydromodification management requirements per the *BMP Design Manual* to reduce the potential for increased erosion in receiving waters due to increased runoff rates and durations often caused by development and increased impervious surfaces.

Finally, PDPs are required to prepare a Storm Water Quality Management Plan (SWQMP). The PDP SWQMP is required to document that all permanent source control and site design BMPs have been considered for the project and implemented where feasible, document the planning process and the decisions that led to the selection of structural BMPs, provide the calculations for design of structural BMPs to demonstrate that applicable performance standards are met by the structural BMP design, identify operations and management requirements of the selected structural BMPs, and identify the maintenance mechanism for long-term operations and management of structural BMPs. The PDP SWQMP also must include copies of the relevant plan sheets showing site design, source control, and structural BMPs, and structural BMP maintenance requirements.

San Diego River Water Quality Improvement Plan

The Municipal Permit requires the phased development and implementation of a WQIP for the San Diego River watershed. As previously detailed, the San Diego River WQIP applies to the project site. The San Diego River WQIP prioritizes and addresses water quality conditions that are influenced by storm drain discharges by applying adaptive planning and management processes that are linked to the highest priority water quality condition relative to these discharges and receiving water quality improvements.

According to the San Diego River WQIP, the highest priority water quality condition is bacteria in the Lower San Diego River Watershed. Bacteria has been a focus in the watershed since adoption of the Bacteria TMDL (Water Board Resolution No. R9-2010-0001). The purpose of the Bacteria TMDL is to protect the health of those who recreate at beaches and streams. The TMDL requires responsible agencies to attain required load reductions during both dry weather and wet weather conditions within a 10- and 20-year compliance timeline, respectively. In 2012, the participating agencies of the WQIP developed a Comprehensive Load Reduction Program that proposed programs designed to achieve TMDL-specified bacteria load reductions, as well as reductions of loads of other 303(d)-listed pollutants.

Drainage Design Manual

The City of San Diego Drainage Design Manual (1984) provides policies and procedures for projects to implement regarding hydrology and design of associated infrastructure to attain reasonable standardization of drainage design throughout the City. The basic considerations are to protect the roadway and property against damage from artificial, storm, and subsurface waters; to provide for public health and safety; and to provide for low maintenance while taking into account the effect of the proposed improvement on traffic and property.

Council Policy 800-04

The purpose of Council Policy 800-04 (Drainage Facilities) is to establish guidelines for the construction and maintenance of stormwater drainage facilities and to identify and assign general financial responsibilities for the construction of various types of drainage facilities.

City of San Diego Storm Water Standards Manual

The primary objectives of the City Storm Water Standards Manual are to:

- Prohibit non-stormwater discharges.
- Reduce the discharge of pollutants to stormwater conveyance systems to the maximum extent practicable by implementing BMPs during the project's construction and operational phases.
- Provide consistency with the BMP Design Manual (County of San Diego 2016).
- Provide guidance for proper implementation of LID facilities and design approaches.
- Provide guidance for conformance with regional hydromodification management requirements.

This manual was updated, and was adopted and took effect in February 2016 to meet the requirements of the BMP Design Manual (County of San Diego 2016) in compliance with the Municipal Permit.

City of San Diego Flood Mitigation Plan

The City of San Diego prepared a citywide Flood Mitigation Plan to meet the requirements of the FEMA Disaster Mitigation Act of 2000. This plan meets the requirements for plans prepared under the FEMA program and addresses options for reducing flood hazards. As previously described, the project site is not within a 100-year floodplain or within a flood hazard area.

City of San Diego Municipal Code

The City's Municipal Code defines the regulations concerning hydrology, water quality, and floodways/floodplains in the following sections: Stormwater Management and Discharge Control Regulations (Chapter 4, Article 3, Division 3), Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2); and Environmentally Sensitive Lands Regulations (Chapter 14, Article 3, Division 1).

The purpose of the Stormwater Management and Discharge Control regulations is to further ensure the health, safety, and general welfare of the citizens of the City of San Diego by controlling and eliminating non-stormwater discharges to the stormwater conveyance system and reducing the pollutants in urban stormwater discharges to the maximum extent practicable.

All development must comply with the Storm Water Runoff and Drainage Regulations and implement measures designed to prevent erosion and control sediment, which serve to regulate the development of and impacts on drainage facilities; limit water quality impacts from development; and to minimize impacts on environmentally sensitive lands.

The purpose of development regulations for environmentally sensitive lands is to protect, preserve, and, where damaged, restore the environmentally sensitive lands of the City and the viability of the species supported by those lands. These regulations are intended to ensure that development occurs

in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

5.8.3 Significance Determination Thresholds

5.8.3.1 Issue Questions

The following issue questions are based on the City's Significance Determination Thresholds (2016) and provide the basis for determining significance of impacts on hydrology and water quality as a result of the proposed project's implementation.

Impacts are considered significant if the project would result in any of the following.

1. A substantial increase in impervious surfaces and associated increased runoff.
2. A substantial alteration to on- and offsite drainage patterns due to changes in runoff flow rates or volumes.
3. An increase in pollutant discharge to surface and groundwater, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body.
4. An increase in pollutant discharge to receiving waters during construction or operation, including discharge to an impaired waterbody or violate federal, state, or regional water quality standards or waste discharge requirements.

5.8.4 Impact Analysis

Issue 1: Runoff

Would the proposed project result in a substantial increase in impervious surfaces and associated increase in runoff?

5.8.4.1 Impact Discussion

Implementation of the project would result in an increase of impervious surfaces within the project site and an associated increase in runoff flow and volume. The increase in impervious surfaces due to the development of the roadway extension would result in a change in impervious surfaces from 0 to approximately 1.25 acres.

An increase in stormwater runoff from the addition of approximately 1.25 acres of impervious surfaces would be considered a PDP per the City's MS4 Permit. The project would be required to comply with the City's MS4 Permit and implement hydromodification management requirements to reduce runoff rates and durations caused by development and increased impervious surfaces. The purpose of hydromodification management requirements for PDPs is to minimize the potential of stormwater discharges from the MS4 from causing altered flow regimes and excessive downstream erosion in receiving waters.

PDPs subject to hydromodification management requirements must provide flow control for post-project runoff to meet the flow control performance standard, which would occur during final design of the project and would be subject to approval by the City. This is typically accomplished

using structural BMPs that may include any combination of infiltration basins; bioretention, biofiltration with partial retention, or biofiltration basins; or detention basins. If onsite retention and biofiltration systems are not feasible, an onsite flow-through BMP would be developed alongside an alternative compliance program per the City's *Storm Water Standards Manual* requirements, to the satisfaction of the City Engineer. In compliance with the MS4 Permit, the proposed project would be required to prepare a SWQMP to document that the general requirements of the MS4 Permit are met, including hydromodification management BMP requirements. Overall, the BMPs would capture and treat stormwater in order to reduce the runoff volumes associated with the project compared to existing conditions. As a result, the project would not result in flood hazards on other properties.

The project site is not located within a FEMA-designated 100-year flood zone (FEMA 2012), and the change in stormwater runoff as a result of the proposed project would not increase flooding on- or off site. Impacts from substantial alteration to on- or offsite drainage patterns due to changes in runoff flow rates or volumes as a result of the roadway extension would be less than significant.

Because the area is located on Group D soils that have the highest potential for runoff and therefore the lowest potential for infiltration and groundwater recharge, groundwater recharge in the Mission San Diego Hydrological Subarea would not be substantially altered following implementation of the proposed project. The proposed project is not located within an area using well water and would not have a substantial effect on groundwater supply. Future implementation of the proposed roadway extension would not use well water nor would groundwater extraction wells be installed as part of the project. Overall, the project would result in less-than-significant impacts on groundwater recharge.

5.8.4.2 Significance of Impact

Construction of the project would introduce new impervious surfaces, but the project would be designed to be consistent with all applicable regulations. Prior to construction of the roadway, the final design of the roadway would be required to demonstrate conformance with applicable stormwater regulations. With adherence to applicable regulations, the project would not affect the rate or volume of surface runoff. Impacts would be less than significant.

5.8.4.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.8.5 Impact Analysis

Issue 2: Drainage Patterns

Would the proposed project result in substantial alteration to on- and offsite drainage patterns due to changes in runoff flow rates or volumes?

5.8.5.1 Impact Discussion

The project site has a general southward stormwater flow path. Currently, stormwater is discharged onto the Quarry Falls site. As discussed above, the project would result in an increase in impervious surfaces that would in turn result in increased stormwater runoff. However, as a result of compliance with the MS4 Permit and implementation of flow-through BMPs to address

hydromodification management requirements, the increase in associated runoff would not be a substantial alteration of existing stormwater runoff patterns adjacent to the project site and would be accommodated by the existing drainage system. Roadway-generated stormwater that would enter the drainage system would not result in substantial erosion and subsequent sedimentation of downstream water bodies, nor would it impact biological communities and archaeological resources, as the Quarry Falls site and the surrounding project vicinity is developed.

The project would be required to comply with the MS4 Permit, the City's Storm Water Standards, and the *BMP Design Manual* (County of San Diego 2016) to help maintain existing hydrologic conditions. The City's Storm Water Standards would mandate inclusion of LID and runoff management, which would reduce impervious surfaces and runoff volumes from current conditions, thereby improving the potential for flooding of the site.

5.8.5.2 Significance of Impact

As previously described in Section 5.8.4, prior to construction of the roadway, the final design of the roadway would be required to demonstrate conformance with applicable stormwater regulations in order to maintain existing hydrologic conditions. Compliance with existing regulations would ensure that alterations to drainage patterns would be less than significant.

5.8.5.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.8.6 Impact Analysis

Issues 3 and 4: Water Quality

Would the proposed project result in (3) an increase in pollutant discharge to surface and groundwater, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body; or (4) an increase in pollutant discharge to receiving waters during construction or operation, including discharge to an impaired waterbody or violate federal, state, or regional water quality standards or waste discharge requirements?

5.8.6.1 Impact Discussion

Project implementation could potentially allow pollutants to enter receiving waters. However, standard construction and post-construction BMPs would be required, in accordance with both the Construction General Permit and Municipal Permit, to control construction- and operation-related erosion and sedimentation. Erosion and sediment controls would be used, and a project-specific SWPPP would be in place during construction activities to reduce the amount of soils disturbed, control erosion, and prevent sediment transport in runoff to surface/receiving waters. Erosion control plans would be prepared and submitted to the State of California and City of San Diego prior to construction.

Urban runoff from a developed roadway has the potential to contribute pollutants associated with automobiles. According to the *BMP Design Manual* (County of San Diego 2016), the project would fall under the category of Streets, Roads, Highways, Freeways and Driveways. The *BMP Design Manual* identifies the anticipated and potential pollutants to the stormwater conveyance system and

receiving waters for this category of projects as sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides. The project would also have the potential to affect receiving waters. The most immediate receiving water for the area is the Lower San Diego River, approximately 0.7 mile to the south. The Lower San Diego River is on the 303(d) list for the various pollutants, including enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, TDS, and toxicity.

Pursuant to the *BMP Design Manual*, the entire volume of the 85th percentile, 24-hour rainfall event must be retained (i.e. intercept, store, infiltrate, evaporate, and evapotranspire). If the full volume cannot be retained on site, biofiltration pollutant controls can be implemented to treat the remaining volume. The project site and surrounding area contains various geotechnical constraints including steep slopes and Group D soils that would make biofiltration pollutant controls unlikely. While Green Street techniques could be used on Phyllis Place, due to onsite geological and soils constraints on the roadway extension itself, it is recommended that runoff be captured and routed for a combination of retention and biofiltration.

If the full volume of the 85th percentile storm cannot be feasibly captured and treated with a combination of retention and biofiltration BMPs, the project would be required to implement flow-through treatment control BMPs to treat runoff leaving the site and to implement an offsite alternative compliance program deemed by the jurisdiction-specific alternative compliance program to provide a greater overall water quality benefit for the portion of the pollutants not addressed on site. The MS4 Permit provides offsite Alternative Compliance, as an option for PDPs in lieu of implementing onsite structural BMPs to comply with pollutant control and hydromodification management requirements. The City's *Storm Water Standards Manual* contains Alternative Compliance requirements. As such, any runoff during construction and post-construction operations would be required to be minimized through these measures.

5.8.6.2 Significance of Impact

As previously described in the preceding issues, prior to construction of the roadway, the final design of the roadway would be required to demonstrate conformance with applicable stormwater regulations. The project would be required to comply with the Municipal Permit and Construction General Permit, the City Storm Water Standards, and the *BMP Design Manual*, and any runoff during construction and post-construction operations would be required to be minimized and treated through measures set forth by these regulations. Compliance with these measures would ensure significant impacts associated with water quality standards would be less than significant.

5.8.6.3 Mitigation Measures

No mitigation would be required.

5.9 Visual Effects and Neighborhood Character

This section describes the existing aesthetic and visual conditions that could be adversely affected by the proposed project; discusses the applicable laws and regulations related to aesthetics and visual quality; and analyzes the proposed project's effect on visual character, views of the project site, and views affected by introducing light or glare. The information and analysis in the following discussion have been compiled based on a review of pertinent documents.

5.9.1 Existing Conditions

5.9.1.1 Regional Context and Neighborhood Character

As discussed in Section 5.1, *Land Use*, the project site is within the southernmost portion of the Serra Mesa Community Planning Area as defined in the City's General Plan. The Serra Mesa Community Planning Area encompasses approximately 6,596 acres and is bounded by the Kearny Mesa Community Planning Area to the north, State Route (SR-) 163 and the Linda Vista Community Planning Area to the west, generally Interstate (I-) 15 to the east, and the Mission Valley Community Planning Area to the south. The Serra Mesa Community Planning Area is characterized primarily by single-family residential development. Serra Mesa also contains a large concentration of medical uses, including three major hospitals: Sharp Memorial, Sharp Mary Birch Hospital for Women and Newborns, and Rady Children's.

In contrast to Serra Mesa, Mission Valley includes higher density uses, including a high concentration of multi-family residential uses (condominiums and apartments) as well as large commercial developments. In the more immediate vicinity, the project site is in a dense urban setting surrounded primarily by existing residential development and major transportation corridors. It is bounded by Phyllis Place to the north and the Quarry Falls mixed-use project to the east, west, and south, which is in various stages of construction. Surrounding land uses include the City View Church and single- and multi-family residential development to the north and northwest, single-family residential development to the west, and vacant/graded land to the east and south.

I-805 is approximately 0.22 mile to the east of the project site. I-805 is not a designated state scenic highway and no scenic highways are within the vicinity of the project site. The nearest state scenic highway is the portion of SR-163 from the south boundary of Balboa Park to the north boundary, which is approximately 3 miles southwest of the project site.

5.9.1.2 Project Site Visual Quality

As discussed in Chapter 2, *Environmental Setting*, the project site currently comprises approximately 2 acres of undeveloped land adjacent to the 230-acre Quarry Falls site. The project site's topography ranges in elevation from approximately 218 feet above mean sea level in the southern portion to 296 feet above mean sea level in the northern portion. The northern portion of the project site slopes upward on a hillside to the point where it abuts Phyllis Place. The middle of the southern portion of the project site dips slightly in the center and then gently slopes upward to both the eastern and western edges of the project site.

The northern portion of the project site (where the proposed road would intersect with Phyllis Place) is visually characterized by hillside covered with sparse vegetation with adjacent offsite land also characterized visually as sparsely vegetated. The southern portion of the project site contains graded land, and land immediately adjacent and off site is characterized by expansive parcels of graded land. Overall, even though the site is primarily disturbed, the visual quality of the site is moderate due to the presence of the hillside.

5.9.1.3 Views from the Project Site

Short-range views from the project site are dominated by the graded Quarry Falls site to the south, east, and west including temporary construction activities and heavy equipment associated with development of the Quarry Falls project. Short-range views to the north and west consist primarily of the roadway of Phyllis Place as well as the landscaped campus of the City View Church. Some views are also available of multi-family residential development to the northwest. The tree-lined hills south of I-805 and the development of Mission Valley occupy background mid- and long-range views from the project site to the south, southeast, and southwest. Limited views of I-805 at its intersection with Friars Road are visible to the southeast from the southern part of the project site; however, in general, views of I-805 from the project area are largely obscured by intervening landscaping and development.

5.9.1.4 Views of the Project Site

The project site is not identified in the City of San Diego General Plan, Serra Mesa Community Plan, or Mission Valley Community Plan as being within a designated public view corridor. Additionally, there are no significant visual landmarks, public resources, or scenic vistas identified in these plans in the vicinity of the project site. From Phyllis Place to the immediate north, passing motorists, bicyclists, and pedestrians looking southward to the project site can see the flat mesa top of the northernmost portion of the project site, which includes vegetated disturbed chaparral and annual grassland, before it drops sharply into the Quarry Falls site below. A telecommunications tower and electrical pole structures adjacent to the project site are visible in the foreground from Phyllis Place. From the Phyllis Place vantage point, the rooftops of recently completed buildings within the Quarry Falls site are visible; however, the majority of the Quarry Falls site is not visible. From other surrounding roadways, such as Abbotshill Road or Kaplan Drive, intermittent views of the Quarry Falls development are available; however, the project site is not visible from these areas due to intervening single-family residences. In addition, according to the Quarry Falls PEIR, motorists traveling northbound on I-805 can see portions of the Quarry Falls development as they pass, although views are fleeting and limited due to the speed of travel and the need to look away from the direction of travel and below to view the area. However, again, views of the project site specifically are not available from I-805.

5.9.1.5 Existing Lighting, Glare, and Shading

With the exception of the Quarry Falls site immediately to the south, the project site is in a built-up urban area where neighborhood night lighting is a common feature. Light sources in the area include streetlights, building lights, illuminated signs, sidewalk lighting, and parking lot lighting. The existing lighting in the area is in compliance with all applicable City laws and regulations. The project site is not currently shaded by any structures, and there is no substantial glare within the immediate project vicinity.

5.9.2 Regulatory Framework

5.9.2.1 State

California Scenic Highway Program

The California Department of Transportation (Caltrans) manages the California Scenic Highway Program, which was created in 1963 by the California legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. A highway may be designated as scenic based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. As previously described, the project site is not adjacent to a designated state scenic highway.

California Energy Code

The California Energy Code (24 CCR Part 6) creates standards to reduce energy consumption. The type of luminaries and the allowable wattage of certain outdoor lighting applications are regulated. Specifically, Section 110.9 provides mandatory requirements for lighting control devices and systems, ballasts, and luminaires.

5.9.2.2 Local

City of San Diego General Plan

The Urban Design Element of the City's General Plan provides guidance for development related to visual quality. It includes citywide design goals and policies regarding visual elements that complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy. The Urban Design Element also addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages. Policies relevant to the project are detailed below.

Table 5.9-1. Relevant General Plan Policies

Policy Number	Policy
UD-A.1	Preserve and protect natural landforms and features.
UD-A.2	Use open space and landscape to define and link communities.
UD-A.3	Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.
UD-A.6	Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.
UD-A.10	Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element.

Policy Number	Policy
UD-A.13	Provide lighting from a variety of sources at appropriate intensities and qualities for safety.
UD-A.16	Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.
UD-B.1	Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.
UD-B.4	Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.
UD-B.5	<p>Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.</p> <ol style="list-style-type: none"> 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. 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. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries. Clarify neighborhood roadway intersections through the use of special paving and landscape. Develop a hierarchy of walkways that delineate village pathways and link to regional trails. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.
UD-C.7	<p>Enhance the public streetscape for greater walkability and neighborhood aesthetics.</p> <ol style="list-style-type: none"> Preserve and enhance existing main streets. Establish build-to lines, or maximum permitted setbacks on designated streets. Design or redesign buildings to include architecturally interesting elements, pedestrian friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground-floor level. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees, pedestrian-scaled lighting and signs, landscape, and street furniture. Relate the ground floor of buildings to the street in a manner that adds to the pedestrian experience while providing an appropriate level of privacy and security. Design or redesign the primary entrances of buildings to open onto the public street.

Serra Mesa Community Plan

The Serra Mesa Community Plan (adopted 1980; most recently amended in April 2011) contains an Environmental Management Element that “considers the total community environment and how it should be managed to achieve the quality of life desired by the Serra Mesa community.” Excerpts of relevant guidelines and policies are included below.

- Steep hillsides and canyons should be protected and preserved in a natural state. Where development is permitted, very low-density urbanization should occur. Natural features should be enhanced and areas of high scenic value and environmental sensitivity, conserved. This proposal can be implemented with steep hillside guidelines, open space zones and [Planned Residential Developments] PRD which is in character with the surrounding neighborhood
- Any public improvements such as roads, drainage channels, and utility services or any lessee development should be compatible with open space objectives. Public road improvements within open space areas are often not feasible due to the steep terrain and habitat preservation requirements, therefore, unimproved public road easements located within open space areas should be vacated and remain unbuilt. No through roads should be permitted to traverse designated open space.
- Diversity within neighborhoods should be encouraged to improve “sense of place” by: varying the type of street surfaces, sidewalks, lights, signs and other street furniture, innovative yet tasteful remodeling and individually distinctive landscaping.

Mission Valley Community Plan

The Mission Valley Community Plan (adopted 1985; most recently amended in May 2013) contains an Open Space Element and Urban Design Element that include guidelines and policies related to visual resources such as hillsides. The Open Space Element identifies the hillsides that form the northern and southern boundaries of the community as natural features of the community, and the Urban Design Element identifies hillsides as one of the five functional categories that require special design considerations and guidelines. Excerpts of relevant objectives, guidelines, and policies are included below.

- Preserve as open space those hillsides characterized by steep slopes or geological instability in order to control urban form, ensure public safety, provide aesthetic enjoyment and protect biological resources.
- Design roads serving hillside and canyon developments carefully and sensitively.
- Automobile access should be carefully designed to provide the minimum possible disruption of the hillside. When necessary to avoid excessive grading, automobile access should be located adjacent to street access and separated from the habitable building sections. The linkages from the street to the building should be made through pedestrian ways, bikeways, etc., which may be easier to incorporate into a hillside condition.

City of San Diego Municipal Code

Land Development Code

The City’s Land Development Code (Chapters 11–15 of the Municipal Code) contains numerous provisions to guide the design of development throughout the City, including development

restrictions and guidelines to protect and enhance environmentally sensitive lands (ESL). The ESL Regulations (Section 143.0101 et seq.) define steep hillsides as natural gradients equal to or in excess of 25% with a minimum elevation differential of 50 feet, or a natural gradient of 200% with a minimum elevation differential of 10 feet. The Land Development Code (Section 142.0101 et seq.) also contains grading regulations to address (among other things) landform preservation and require that all grading be designed and performed in conformance with applicable City Council policies and the standards established in the *Land Development Manual* (including the ESL Regulations, as further detailed below).

Lighting Regulations

Lighting within the City is controlled by the City's Outdoor Lighting Regulations per Section 142.0740 of the Municipal Code. The City's Outdoor Lighting Regulations are intended to provide public safety, conserve energy, and protect surrounding land uses as well as astronomy activities at the Palomar and Mount Laguna Observatories from excessive light generated by new development. The project is not located within 30 miles of the Palomar and Mount Laguna Observatories; therefore, regulations pertaining to these observatories are not applicable.

Lighting for the project would also be required to comply with the applicable provisions of the *Street Design Manual 2002* (City 2002)). This manual provides the following.

Street lighting shall be installed at all street intersections and shall be high-pressure sodium (HPS) vapor, except for areas which are designated for low pressure sodium (LPS) vapor." Midblock street lighting is required if the roadway meets certain conditions, including the following.

- On Four-Lane Urban Major Streets or higher with center medians, on both sides of the street at intervals not to exceed 150 feet (45 [meters] m) within 1,302 feet (400 m) of transit stops and in residential and commercial high-crime census tracts, or in other areas on both sides of the street at intervals not to exceed 300 feet (90 m).
- In areas of high pedestrian activity, such as schools, parks, transit centers, access to transit, and commercial and recreational facilities that draw large numbers of pedestrians.
- At other locations, such as at abrupt changes in horizontal or vertical alignment, or areas of heavy pedestrian use, as needed.

Midblock street lighting shall be full cutoff, Type III fixtures and shall conform to the following:

- 250 Watt HPS or 180 Watt LPS, as applicable, for streets classified as collector or higher with curb-to-curb width greater than 52 feet (16.0 m)

Glare Regulations

Glare within the City is controlled by City's Municipal Code Section 142.0730 (Glare Regulations). The City's Glare Regulations include the following:

- A maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30 percent (Section 142.0730 (a)).
- Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).

City of San Diego Land Development Manual

The Land Development Manual (revised September 2004) provides information to assist in the processing and review of development applications. The Steep Hillside Guidelines (2004) are a component of this manual that provide standards and guidelines intended to assist in the interpretation and implementation of the development regulations for steep hillsides contained in the City's Municipal Code (Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands). Every proposed development that encroaches into steep hillsides will be subject to the ESL Regulations and will be evaluated for conformance with the Steep Hillside Guidelines as part of the review process for the required permit. The Steep Hillside Guidelines do not provide specific guidance for the design of roadways. These guidelines do include certain policies that are specific to certain communities, including Mission Valley. As a portion of the project site is within Mission Valley, the relevant policies are excerpted below.

- Design roads serving hillside and canyon developments carefully and sensitively.
- Roads serving Valley development (office, educational, commercial-recreation, commercial-retail) at the base of the steep hillsides should consist of short side streets branching off Camino Del Rio South or Hotel Circle South. These side streets should provide primary access to projects in preference to collector streets.
- Orient development towards the valley and take access to Mission Valley projects from roads that do not extend above the 150-foot elevation contour.
- Preserve the natural landform and greenbelt of the southern hillsides and rehabilitate the northern hillsides.

5.9.3 Significance Determination Thresholds

5.9.3.1 Issue Questions

The following significance criteria from the City's Significance Determination Thresholds for Visual Effects and Neighborhood Character provide the basis for determining the significance of impacts resulting from the proposed project. The determination of whether an aesthetics and visual quality impact would be significant is based on the thresholds described below and the professional judgment of the City as Lead Agency.

Impacts are considered significant if the proposed project would result in any of the following.

1. A substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan.
2. The creation of a negative aesthetic site or project.
3. Substantial alteration to the existing or planned character of the area.
4. The loss of any distinctive or landmark tree(s), or stand of mature trees, as identified in the community plan.
5. Substantial change in the existing landform.
6. Substantial light or glare which would adversely affect daytime or nighttime view in the area.

Where feasible, these issues have been combined for ease of discussion.

5.9.4 Impact Analysis

Issue 1: Views

Would the proposed project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Projects that would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (Pacific Ocean, downtown skyline, mountains, canyons, waterways) may result in a significant impact. It should be noted that views from private property are not protected by CEQA or the City.

5.9.4.2 Impact Discussion

The project site is not identified in the City of San Diego General Plan, Serra Mesa Community Plan, or Mission Valley Community Plan as being within a designated public view corridor. Additionally, there are no significant visual landmarks, public resources, or scenic vistas identified in these plans in the vicinity of the project site.

The proposed project would involve construction of a roadway to connect Phyllis Place with Via Alta and Franklin Ridge Road within a 2-acre site, which would be a ground-level feature with minimal vertical elements. During construction of the proposed project, soil stockpiling, construction equipment, and personnel within the construction zones may be visible to motorists, pedestrians, or bicyclists using Phyllis Place, Via Alta, and Franklin Ridge Road; however, these components would not block any views of or through the project site. Upon completion of construction, all temporary visual impacts due to construction activity would cease. Street lighting, including lighting poles, would be installed for the roadway as well as landscaping trees; however, no vertical building structures would result from implementation of the proposed project that would block views from Phyllis Place or otherwise obstruct views of motorists, pedestrians, or bicyclists from roads in the area. In addition, as part of the Quarry Falls project, a linear park would be constructed along the southern side of Phyllis Place. As noted in Chapter 3, *Project Description*, there are two approved general development plans for the linear park, one with the proposed roadway and one without. The proposed roadway is a ground-level feature, and its implementation would not obstruct views that may be available from this proposed park or from any other park or open space areas in the vicinity of the project site. Therefore, no scenic views would be blocked or affected, and implementation of the proposed project would not block or otherwise affect any designated scenic vistas.

5.9.4.3 Significance of Impact

Because there are no scenic vistas in the project area as identified in the City's General Plan or the Serra Mesa or Mission Valley Community Plans and the project would not include vertical structures that could obstruct views, impacts on scenic vistas would be less than significant.

5.9.4.4 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures would be required.

5.9.5 Impact Analysis

Issues 2, 3, and 4: Aesthetics/Neighborhood Character/Visual Resources

Would the project result in (2) the creation of a negative aesthetic site or project; (3) substantial alteration to the existing or planned character of the area; or (4) the loss of any distinctive or landmark tree(s), or stand of mature trees, as identified in the community plan.

5.9.5.1 Impact Discussion

The project does not include any buildings or vertical structures aside from light poles. The project site is not designated as a historical landmark and does not include a stand of natural trees, vegetation, or rock outcroppings that would be considered a significant visual resource.

Additionally, there are no community symbols or landmarks on site that are identified in the City's General Plan or within the Serra Mesa or Mission Valley Community Plans. As such, the proposed project would not result in the loss, isolation, or degradation of a community identification symbol or landmark, and there would be no impacts related to this threshold.

The proposed project would also not result in significant impacts on the existing or planned character of the area. The proposed project would increase the average daily traffic along Phyllis Place as it would provide a connection southwards to Mission Valley. However, the Serra Mesa Community Plan calls for Phyllis Place to be classified as a four-lane major road. Therefore, the proposed project would not change the planned character of the area. The proposed roadway would similarly not change the character of existing residential areas to the west of the project site as there would not be a substantial amount of vehicles traveling west of the roadway connection. For example, the Abbotshill neighborhood of Serra Mesa, northwest of the project area, does not contain an outlet to a larger road network. As a result, the neighborhood character would not be significantly impacted.

Concerning site visibility, the project site is not visible from I-805. The project site is on a hillside that is visible from the Quarry Falls development and Phyllis Place. However, within the context of the substantial development occurring at the Quarry Falls site and other existing development in the vicinity of the project site, the inclusion of a relatively small segment of roadway would be minimally discernible from the surrounding area. In addition, the project would be developed using the standards for a four-lane urban major street established by the City of San Diego in the *Street Design Manual 2002*. Following these standards would ensure that all necessary components of the roadway, such as roadway and lane widths, curb cuts, sidewalks, and bicycle lanes, are incorporated, and that the proposed roadway is designed in a uniform manner. In addition, landscaping that conforms with the City's Landscape Regulations would be included in the project design to enhance the aesthetic character of the street design. As such, the proposed project would be in compliance with the City codes, which would ensure that the project is visually appealing and would not result in a negative aesthetic impact.

5.9.5.2 Significance of Impact

Implementation of the proposed project would not create a negative site aesthetic, result in substantial conflict with the existing or planned character of the neighborhood or community, or result in the loss of any distinctive or landmark tree(s), or stand of mature trees, as identified in the

Serra Mesa Community Plan or Mission Valley Community Plan. Therefore, impacts related to aesthetics, neighborhood character, and visual resources would be less than significant.

5.9.5.3 Mitigation Measures

Impacts would be less than significant and therefore no mitigation measures would be required.

5.9.6 Impact Analysis

Issue 5: Landform Alteration

Would the proposed project result in substantial alteration in the existing landform?

5.9.6.1 Impact Discussion

Construction of the roadway segment could result in the substantial alteration of an existing landform. The project site is on a steep hillside with natural gradients equal to or in excess of 25%, and is, therefore, subject to the City's ESL regulations. As discussed in Chapter 3, *Project Description*, the proposed project would entail 43,500 cubic yards of fill and 0 yards of cut. The maximum fill would be approximately 46 feet. Therefore, the project would alter more than 2,000 cubic yards of earth per graded acre and/or result in a change in elevation of a steep hillside from existing grade to proposed grade of more than 5 feet. As such, the proposed project would result in a significant impact related to landform alterations (**Impact-VIS-1**).

5.9.6.2 Significance of Impact

The proposed project would result in a substantial change to the existing landform (**Impact-VIS-1**). Impacts would be significant and mitigation would be required.

5.9.6.3 Mitigation Measures

MM-VIS-1: Landform Alterations

Prior to issuance of grading permits, the project applicant shall implement design features and grading techniques specific to the alteration of the hillside. The grading plans shall be subject to the review and approval by the City prior to issuance of a grading permit.

The grading plans shall clearly demonstrate, with both spot elevations and contours, that:

- 1) The proposed landforms shall very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This can be achieved through "naturalized" variable slopes.
- 2) The proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.
- 3) The gradient of the slopes will be varied rather than left at a constant angle, in order to create a more natural appearance.
- 4) Natural landform plantings are incorporated to soften the appearance of manufactured slopes.

5.9.6.4 Significance after Mitigation

With implementation of **MM-VIS-1**, the visual impacts of landform alteration on a steep hillside would be reduced to less than significant levels.

5.9.7 Impact Analysis

Issue 6: Lighting and Glare

Would the proposed project result in substantial light or glare which would adversely affect daytime or nighttime view in the area?

5.9.7.1 Impact Discussion

The project site is in a previously developed urban area that already exhibits several major lighting sources, such as lighting along major roadways (e.g., I-805 and Abbotshill Road) and headlights from passing vehicles. Other sources of light in the area include outdoor lighting features associated with the existing residential development north and west of the area. As previously analyzed in the Quarry Falls PEIR, the Quarry Falls project would also introduce lighting that would further contribute to daytime and nighttime lighting immediately adjacent to the project site. The proposed project may include minor roadway lighting similar to that of the surrounding development and additional vehicle headlights from nighttime travel; however, no new substantial source of lighting would be introduced to the area such that daytime or nighttime lighting conditions would be notably modified, nor would daytime or nighttime views be altered due to any lighting improvements associated with the proposed project. Given these factors, the contribution of light emitted from the addition of the proposed roadway segment would be negligible, and impacts would be less than significant.

The proposed project would include construction of a street connection. Implementation of the proposed project would not include any components that use reflective materials (i.e., windows, large surface parking lots with parked cars, etc.) that would produce substantial sources of glare. In addition, the configuration of the proposed roadway would not accommodate parking lanes along the sides of the roadway. Therefore, impacts related to glare would be less than significant.

5.9.7.2 Significance of Impact

The proposed project would not result in substantial light or glare that would adversely affect daytime or nighttime views in the area. Impacts would be less than significant.

5.9.7.3 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures would be required.

5.10 Greenhouse Gases

This section describes global climate change and existing greenhouse gas (GHG) emission sources; summarizes applicable federal, State, and local regulations; and analyzes the potential effects of GHGs from the project on global climate change. Consistency with applicable GHG reduction plans, including the City of San Diego's Climate Action Plan (CAP), is also addressed.

5.10.1 Existing Conditions

Climate change is a complex phenomenon that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea-level rise (both globally and regionally) as well as changes in climate and rainfall, among other effects, there remains uncertainty with regard to characterizing precise local climate characteristics and predicting precisely how various ecological and social systems will react to any changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change is expected to occur in the future and that the entire San Diego region, including the project area, will be affected by changing climatic conditions.

The phenomenon known as the *greenhouse effect* keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of Earth (Center for Climate and Energy Solutions 2011).

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution. Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a phenomenon commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperature and acidity, reduced sea ice, variable precipitation, and increased frequency and intensity of extreme weather events (IPCC 2007). Large-scale changes to Earth's system are collectively referred to as *climate change*.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that the average global temperature will rise by 0.3–4.8° Celsius (0.5–8.6° Fahrenheit) during the twenty-first century (IPCC 2014). Large increases in global temperatures could have substantial adverse effects on the natural and human environments on the planet and in California. The Serra Mesa and Mission Valley Community Planning Areas are currently a source of anthropogenic GHG, with emissions generated by vehicular traffic and by the energy use, water use, and solid waste disposal of existing development.

5.10.1.1 State and Regional GHG Inventories

California Air Resources Board Inventory

The California Air Resources Board (CARB) maintains a statewide emission inventory of GHGs. As shown in Table 5.10-1, in 2014, the largest contributor to GHG emission was the transportation sector (37%). This sector includes emissions from on-road vehicles, waterborne vessels, and rail operations. The next largest contributor to emissions was the industrial sector (24%), followed by electricity generations (in-state and imports). Emissions are quantified in million metric tons (MMT) of carbon dioxide (CO₂) equivalent (CO₂e). Statewide GHG source emissions totaled approximately 427 MMT CO₂e in 1990, 487 MMT CO₂e in 2008, 459 MMT CO₂e in 2012, and 442 MMT CO₂e in 2014. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. CARB has adopted multiple GHG emission reduction measures, and most of the reductions since 2008 have been driven by economic factors (recession), previous energy-efficiency actions, and the Renewables Portfolio Standard. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric CO₂ (sinks) by photosynthesis, which is then bound (sequestered) in plant tissues.

Table 5.10-1. California Greenhouse Gas Inventory (2014)

Sector	Emissions (MMT CO ₂ e)	Percentage of Inventory
Transportation	163	37%
Industrial	104	24%
Electricity Generation (In State)	52	12%
Electricity Generation (Imports)	37	8%
Agriculture & Forestry	36	8%
Residential	27	6%
Commercial	22	5%
Not Specified	1	<1%
Total	442	100%

Source: CARB 2016

5.10.1.2 City of San Diego CAP Inventory

A San Diego regional emissions inventory prepared as part of the City of San Diego's CAP reported GHG emissions totaling approximately 13 MMT CO₂e in 2010. Similar to the statewide emissions, transportation-related GHG emissions contributed the most citywide, followed by emissions associated with energy use.

5.10.2 Regulatory Framework

5.10.2.1 Federal

Federal Clean Air Act

The U.S. Environmental Protection Agency (EPA) is the federal agency responsible for implementing the federal Clean Air Act. The United States Supreme Court ruled on April 2, 2007, that CO₂ is an air pollutant as defined under the Clean Air Act, and that EPA has the authority to regulate emissions of GHGs. EPA has also acknowledged potential threats imposed by climate change in a *Cause or Contribute Finding*, which found that GHG emissions contribute to pollution that threatens public health and welfare. This was a prerequisite to finalizing the national program for GHG emissions and fuel economy standards for light-duty vehicles (passenger cars and trucks), was developed jointly by EPA and the National Highway Traffic Safety Administration. The standards were established in two phases: the first for model years 2012–2016 and the second for years 2017–2025 (U.S. Environmental Protection Agency 2012). The emissions standards will require model year 2016 vehicles to meet an estimated combined average emissions level of 250 grams of CO₂ per mile, which is equivalent to 35.5 miles per gallon if the automobile industry were to meet this CO₂ level solely through fuel economy improvements.

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, EPA published the Final Mandatory Greenhouse Gas Reporting Rule (Reporting Rule) in the Federal Register. The Reporting Rule requires reporting of GHG data and other relevant information from fossil fuel and industrial GHG suppliers, vehicle and engine manufacturers, and any facility that would emit 25,000 metric tons or more of CO₂e per year. The Reporting Rule also mandates recordkeeping and administrative requirements to enable EPA to verify the annual GHG emissions reports.

Council on Environmental Quality NEPA Guidance

The Council on Environmental Quality released final National Environmental Policy Act (NEPA) guidance on the consideration of the effects of climate change and GHG emissions. The draft guidance applies to all proposed federal agency actions, including land and resource management actions. The guidance explains that agencies should consider both the potential effects of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance is intended to assist agencies in disclosing and considering the reasonably foreseeable effects of proposed actions that are relevant to their decision-making processes. While draft versions did identify 25,000 metric tons of direct CO₂e per year as an indicator that further NEPA review may be warranted, this reference point was removed in the final guidance (Council on Environmental Quality 2016).

5.10.2.2 State

California has adopted statewide legislation addressing various aspects of climate change, GHG mitigation, and energy efficiency. Much of this establishes a broad framework for the State's long-term GHG and energy reduction goals and climate change adaptation program. The former and current governors of California have also issued several executive orders (EOs) related to the State's

evolving climate change policy. Summaries of key policies, EOs, regulations, and legislation at the State level that are relevant to the project are provided below in chronological order.

Assembly Bill 1493—Pavley Rules (2002, amendments 2009)/Advanced Clean Cars (2011)

Known as Pavley I, Assembly Bill (AB) 1493 provided the nation's first GHG standards for automobiles. AB 1493 required CARB to adopt vehicle standards that will lower GHG emissions from new light-duty autos to the maximum extent feasible beginning in 2009. Additional strengthening of the Pavley standards (referred to previously as *Pavley II* and now referred to as the *Advanced Clean Cars* measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025.

Executive Order S-03-05 (2005)

EO S-03-05 is designed to reduce California's GHG emissions to (1) 2000 levels by 2010, (2) 1990 levels by 2020, and (3) 80% below 1990 levels by 2050.

Assembly Bill 32—California Global Warming Solutions Act (2006)

AB 32 codified the State's GHG emissions target by requiring California's global warming emissions to be reduced to 1990 levels by 2020. Since being adopted, CARB, the California Energy Commission, the California Public Utilities Commission, and the California Building Standards Commission have been developing regulations that will help the State meet the goals of AB 32 and EO S-03-05. The scoping plan for AB 32 identifies specific measures to reduce GHG emissions to 1990 levels by 2020 and requires CARB and other State agencies to develop and enforce regulations and other initiatives to reduce GHG emissions. The AB 32 Scoping Plan, first adopted in 2008, comprises the State's roadmap for meeting AB 32's reduction target. Specifically, the scoping plan articulates a key role for local governments by recommending that they establish GHG emissions-reduction goals for both their municipal operations and the community that are consistent with those of the State (i.e., approximately 15% below current levels).

CARB approved the *First Update to the Scoping Plan* on May 22, 2014. The first update includes both a 2020 element and a post-2020 element. The 2020 element focuses on the State, regional, and local initiatives that are being implemented now to help the State meet the 2020 goal. The AB 32 Scoping Plan does not provide an explicit role for local air districts in implementing AB 32, but it does state that CARB will work actively with air districts in coordinating emissions reporting, encouraging and coordinating GHG reductions, and providing technical assistance in quantifying reductions (CARB 2008).

Executive Order S-01-07—Low Carbon Fuel Standard (2007)

EO S-01-07, the Low Carbon Fuel Standard (LCFS), mandates (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020, with a reduction in the carbon content of fuel by a quarter of a percent starting in 2011, and (2) that a low carbon fuel standard for transportation fuels be established in California. The EO initiates a research and regulatory process at CARB. The LCFS regulation does not apply to certain transportation applications, including locomotives and ocean-going vessels. Note that the majority of the emissions benefits due to the LCFS come from the production cycle (upstream emissions) of the fuel rather

than the combustion cycle (tailpipe). As a result, LCFS-related reductions are not included in this analysis of combustion-related emissions of CO₂.

Senate Bill 375—Sustainable Communities Strategy (2008)

Senate Bill (SB) 375 provides for a new planning process that coordinates land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires regional transportation plans (RTPs), developed by metropolitan planning organizations, to incorporate a sustainable communities strategy (SCS). The goal of the SCS is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development.

The final reduction targets from CARB require the San Diego Association of Governments (SANDAG) to identify strategies to reduce per-capita GHG emissions from passenger vehicles by approximately 7% by 2020 and 13% by 2035 over base year 2005. SANDAG's 2050 RTP and SCS, which detail steps the region will take to reduce GHG emissions to State-mandated levels, were originally adopted by SANDAG on October 28, 2011 (SANDAG 2011). A legal challenge to the 2011 CEQA document for the RTP/SCS is ongoing. State law requires development of an RTP/SCS every 4 years; therefore, a new RTP/SCS was adopted by SANDAG as part of the Regional Plan on October 9, 2015, including the certification of a new EIR (SANDAG 2015).

Executive Order B-30-15 (2015)

EO B-30-15 established a medium-term goal for 2030 of reducing GHG emissions by 40% below 1990 levels and requires CARB to update its current AB 32 Scoping Plan to identify the measures to meet the 2030 target. The EO supports EO S-03-05, described above, but is currently only binding on State agencies. However, there are current (2015/2016) proposals (SB 32) at the State legislature to establish a statutory target for 2030.

Senate Bill 97

SB 97 required the Governor's Office of Planning and Research to develop recommended amendments to the State CEQA Guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.

Senate Bill 350—De Leon (Clean Energy and Pollution Reduction Act of 2015)

SB 350 was approved by the California legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions are to require the following by 2030: (1) a renewables portfolio standard of 50% and (2) a doubling of energy efficiency (electrical and natural gas) by 2030, including improvements to the efficiency of existing buildings. These mandates will be implemented by future actions of the California Public Utilities Commission and California Energy Commission.

Senate Bill 32, California Global Warming Solutions Act of 2006, and Assembly Bill 197, State Air Resources Board, Greenhouse Gases, Regulations (2016)

SB 32 (Pavley) requires CARB to ensure that statewide GHG emissions are reduced to at least 40% below the 1990 level by 2030, consistent with the target set forth in EO B-30-15. The bill became

effective alongside AB 197 (Garcia) on January 1, 2017. AB 197 creates requirements to form the Joint Legislative Committee on Climate Change Policies; requires CARB to prioritize direct emission reductions from stationary sources, mobile sources, and other sources and consider social costs when adopting regulations to reduce GHG emissions beyond the 2020 statewide limit; requires CARB to prepare reports on sources of GHGs, criteria air pollutants, and toxic air contaminants; establishes 6-year terms for voting members of CARB; and adds two legislators as non-voting members of CARB. Both bills were signed by Governor Brown in September 2016. CARB released a discussion draft of the 2030 Target Scoping Plan Update in December 2016, which outlines CARB's current thoughts on steps to achieve the 2030 reduction target of 40% below 1990 levels by 2030 prescribed in SB 32. CARB is expecting to finalize the 2030 Scoping Plan in spring 2017.

5.10.2.3 Local

San Diego Air Pollution Control District

As discussed in Section 5.3, *Air Quality*, the San Diego Air Pollution Control District administers the California and federal clean air acts according to guidelines set forth by State and federal agencies in San Diego County. Currently, the San Diego Air Pollution Control District has not adopted significance thresholds for GHGs in accordance with the State CEQA Guidelines.

City of San Diego General Plan

The Conservation Element within the City's General Plan contains policies that are relevant to the proposed roadway project, as shown in Table 5.10-2.

Table 5.10-2. Relevant General Plan Policies

Policy Number	Policy
CE-A.2	<p>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:</p> <ul style="list-style-type: none"> • 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; • Reduce waste by improving management and recycling programs.
CE-A.11	<ul style="list-style-type: none"> • Implement sustainable landscape design and maintenance. • Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. • Reduce use of lawn types that require high levels of irrigation. • Minimize the use of landscape equipment powered by fossil fuels. • Implement water conservation measures in site/building design and landscaping. • Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible.

Policy Number	Policy
CE-A.12	<p>Reduce the San Diego Urban Heat Island, through actions such as:</p> <ul style="list-style-type: none"> • Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; • Planting trees and other vegetation, to provide shade and cool air temperatures; • Reducing heat build-up in parking lots through increased shading or use of cool paving materials as feasible

City of San Diego Climate Action Plan

In December 2015, the City adopted its CAP, which identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual (BAU) projection for emissions at 2020 and 2035, State targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.

Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMT CO_{2e} in 2020 and 16.7 MMT CO_{2e} in 2035. To achieve its proportional share of the State reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15% in 2020 and 50% by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO_{2e} in 2020 and 6.5 MMT CO_{2e} in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO_{2e} by 2020 and 205,462 MMT CO_{2e} by 2035. The CAP includes a Monitoring and Reporting Program. Measure 1.4 of the Monitoring and Reporting Program calls for City Staff to annually evaluate City policies, plans (including the CAP), and codes as needed to ensure the CAP reduction targets are met.

The City's CAP includes five overarching strategies to achieve the GHG reduction goals of the CAP; (1) Energy & Water Efficient Building; (2) Clean & Renewable Energy; (3) Bicycling, Walking, Transit, & Land Use; (4) Zero Waste (Gas & Waste Management), and (5) Climate Resiliency. In particular, Strategy 3 (Bicycling, Walking, Transit, & Land Use) includes various goals and actions that cover a broad range of activities that aim to reduce VMT and improve mobility by implementing appropriate land use changes and promoting alternative modes of travel, among others.

It is important to note that the future population and land use growth in the CAP are based on the community plans that were in effect at the time the CAP was being developed. The projected transportation sector emissions in the CAP are largely affected by the future year VMT that was estimated based on implementation of those community plans. Therefore, proposed changes to the land uses and circulation networks in the community plans are evaluated as components of the City's CAP.

Strategy 3 of the CAP contains various Supporting Measures to help achieve the Bicycling, Walking, Transit, & Land Use goals of the CAP. The measures that are relevant to the roadway project include the following.

- Implement bicycle improvements concurrent with street resurfacing projects, including lane diets, green bike lanes, sharrows, and buffered bike lanes.

- Identify and address gaps in the City's pedestrian network and opportunities for improved pedestrian crossings, using the City's Pedestrian Master Plan and the City's sidewalk assessment.
- Achieve better walkability and transit-supportive densities by locating a majority of all new residential development within Transit Priority Areas.
- In addition to commuting, implement infrastructure improvements including "complete streets" to facilitate alternative transportation modes for all travel trips.

With the July 2016 adoption of an amendment to the CAP to include the CAP Consistency Checklist, the CAP meets all the requirements of State CEQA Guidelines Section 15183.5(b)(1)(A – F) to be a Qualified GHG Reduction Plan. In meeting these requirements, the City of San Diego has analyzed and mitigated the significant effects of GHG emissions for the entire City at the programmatic level. Pursuant to State CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted Qualified GHG Reduction Plan. The CAP Final EIR concluded that implementation of the CAP, which includes an annual monitoring program, would result in less-than-significant overall citywide GHG emissions, and this analysis tiers from that analysis in the CAP's certified Final EIR.

5.10.3 Significance Determination Thresholds

5.10.3.1 Issue Questions

As identified in the City's Significance Determination Thresholds (2016), impacts related to GHG emissions would be significant if the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, and/or
2. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

5.10.3.2 Methodology and Assumptions

The State CEQA Guidelines do not indicate what amount of GHG emissions would constitute a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4(a) and 15064.7(c)). The California Supreme Court decision in the *Centers for Biological Diversity et al. vs. California Department of Fish and Wildlife, the Newhall Land and Farming Company* (2015) 62 Cal.4th 204 (hereafter Newhall Ranch) confirmed that there are multiple potential pathways for evaluating project-level GHG emissions consistent with CEQA, depending on the circumstances of a given

project. These potential pathways include reliance on the BAU model,¹ numeric thresholds, and compliance with regulatory programs, including qualified GHG reduction plans (i.e., CAP).

As discussed under Section 5.10.2.3, the City's CAP is a qualified GHG Reduction Plan per the requirements of State CEQA Guidelines Section 15183.5. As such, consistency with the City's CAP is used to evaluate the significance of the project's GHG impact. A consistency analysis of the proposed project with the CAP is evaluated first through a comparison of the land use and transportation scenarios on which the CAP is based, and secondly through consideration of the specific emission calculations that are included in the CAP.

Projected transportation sector emissions in the CAP are based on VMT. If the proposed project would result in increased VMT compared to the baseline scenario, it may result in an emissions increase that would conflict with the goals, policies, and reductions necessary to reach the CAP's reduction targets. Further analysis would be required to determine if such increases were consistent with the CAP.

The proposed project is a roadway connection that aims to improve local mobility between the Serra Mesa and Mission Valley planning areas. By providing a new roadway connection, the project may affect future vehicle circulation on local roadways and freeways, as motor vehicles would reroute their future trips based on the new roadway connection. As such, the new roadway connection would introduce new trips to the project area that currently use an alternative route, thereby affecting, and potentially reducing, traffic volumes on existing surrounding roadways. Therefore, in order to analyze the potential effects of the project on regional roadway network and the City's mobility goals, the operational analysis focuses solely on the change in regional traffic volumes and the associated change in GHG emissions that would result from project implementation.

In order to determine the change in regional traffic volumes, regional VMT for the project was modeled by SANDAG (Appendix H). VMT was modeled for the existing conditions (2013),² without the proposed roadway connection for both the Near-Term (Year 2017) and Long-Term (Year 2035) scenarios, and with the proposed project for both the Near-Term (Year 2017) and Long-Term (Year 2035) traffic scenarios.

If VMT and associated emissions from project implementation are less than or equal to the baseline conditions, then impacts would be less than significant and no further analysis is required. However, if VMT and associated emissions from implementation of the project are greater than baseline conditions, then impacts related to GHG emissions would require further evaluation to determine if the project's emissions are consistent with the CAP.

¹ Only if "an examination of the data behind the Scoping Plan's business-as-usual model allowed the lead agency to determine what level of reduction from business as usual a new land use development at the proposed location must contribute in order to comply with statewide goals."

² Results for existing conditions are presented for informational purposes only. The impact determination is based on the proposed project's change to the Near-Term (2017) and Long-Term (2035) baseline scenarios.

5.10.4 Impact Analysis

Issue 1: GHG Emissions

Would the proposed project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

5.10.4.2 Impact Discussion

Construction

Construction activities would generate short-term emissions of CO₂, methane (CH₄), and nitrous oxide (N₂O) from the use of equipment (e.g., graders) and on-road vehicles (e.g., employee commuter cars). GHG emissions generated by construction activities were estimated using the most recent version of the Sacramento Metropolitan Air Quality Management District's Road Construction Emissions Model (RCEM) (Version 8.1.0, 2016)³ and the assumptions described in Section 5.3, *Air Quality*.

Table 5.10-3 summarizes the estimated emissions levels for each phase of construction, which are (1) grubbing/land clearing; (2) grading; (3) drainage/utilities/sub-grade; and (4) paving. Total emissions over the 9-month construction period are also presented, as well as average annual emissions amortized over a 30-year project lifetime. To be conservative, all construction emissions are assumed to occur in 2017, and these emissions were combined with project operations to provide the total generation of GHGs.

Table 5.10-3. Estimated Construction Emissions (metric tons)

Phase	CO ₂	CH ₄	N ₂ O	CO ₂ e
Grubbing/land clearing	119	<0.1	<0.1	121
Grading	351	0.1	<0.1	355
Drainage/utilities/sub-grade	188	<0.1	<0.1	190
Paving	38	<0.1	<0.1	39
<i>Total Construction</i>	<i>697</i>	<i>0.2</i>	<i><0.1</i>	<i>704</i>
Average Annual ¹	23	<0.01	<0.01	23

Source: Sacramento Metropolitan Air Quality Management District 2016.

Totals may not add exactly due to rounding.

¹ Total construction emissions amortized over a 30-year project lifetime.

Operation

As stated under Section 5.10.3.2, consistency with the CAP and its associated emissions is first evaluated through a comparison of the land use and transportation scenarios that were used in developing the CAP. As discussed in Section 5.1, *Land Use*, the project site is designated by the General Plan as Residential, by the Serra Mesa Community Plan as Low-Density Residential, and by

³ The Sacramento Metropolitan Air Quality Management District develops and maintains the RCEM, but the emission factors and analysis procedures are applicable to projects throughout the state.

the Mission Valley Community Plan as multiple use (through the Quarry Falls Specific Plan). As noted therein, the proposed roadway connection is included in the Mission Valley Community Plan. Therefore, because the project is consistent with the land use plan (i.e., Mission Valley Community Plan) that was used in the formulation of the CAP, then the project and its associated emissions are accounted for in the CAP. Moreover, the project would be consistent with the goals and policies of the City's General Plan by increasing mobility options by including bike and pedestrian access and by providing a more direct route to transit in Mission Valley that would provide vehicle congestion relief in some areas and reduce VMT regionally. Therefore, because the project's VMT is accounted for in the City's CAP and because the project is consistent with the mobility goals of the General Plan, the proposed project is considered consistent with the CAP and would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.

A quantitative analysis was also conducted to further evaluate the impact that the proposed project would have on CAP implementation. The proposed project would add a roadway connection to the physical roadway network that would affect future vehicle circulation on local roadways and freeways. As on-road vehicles would reroute future trips with the proposed roadway connection, the project would affect traffic volumes on surrounding roadways. The operational analysis evaluates how the change in traffic volumes as result of the proposed project would affect GHG emissions.

Section 5.2, *Transportation and Circulation*, and Appendix C provide additional detail on the traffic modeling analysis and indicate how various freeway and arterial segments would be affected as a result of the proposed project. Appendix H includes the modeling results performed by SANDAG in calculating the regional VMT effects of the project within the project vicinity. The average daily traffic was multiplied by the segment lengths to determine the VMT associated with each freeway and arterial segment affected by the proposed project. The changes in emission estimates are based on the VMT for the freeway and arterial segments as a result of the proposed project.

Table 5.10-4 summarizes the modeled VMT and associated emissions by scenario and presents a comparison of project emissions to the existing and baseline conditions. The differences in emissions between the project and baseline conditions represent emissions generated directly as a result of the change in VMT due to implementation of the project. The Near-Term (2017) and Long-Term (2035) year analyses account for reductions in vehicular emission rates as a result of continuing improvements in engine technology and the retirement of older, higher-emitting vehicles. Refer to Appendix D for the modeling emission factors.

Table 5.10-4. Estimated Annual Vehicle Miles Traveled and Operational Emissions (metric tons)

Analysis Scenario	VMT	CO₂	Other¹	CO₂e
2013 Existing ²	1,847,366	872	44	916
2017 Near-Term Baseline	2,055,012	889	44	934
2017 Near-Term with Project	2,040,522	883	44	927
2035 Long-Term Baseline	2,367,056	718	36	753
2035 Long-Term with Project	2,349,333	712	36	748
Comparison to Baseline Conditions				
2017 Near-Term	-14,490	-6	<0	-7
2035 Long-Term	-17,723	-5	<0	-6

Source: California Air Resources Board EMFAC model. Totals may not add exactly due to rounding.

¹ Includes CH₄, N₂O, and other trace GHGs emissions emitted by typical passenger vehicles (U.S. Environmental Protection Agency 2013a and 2013b).

² Presented for informational purposes. Impact determination made based on comparison of project effects over near-term and long-term baseline conditions (see Section 5.10.3.2).

As shown in Table 5.10-4, the project would reduce regional annual VMT by 14,490 relative to the 2017 Near-Term baseline condition and by 17,723 relative to the 2035 Long-Term baseline condition. As a result of this change in VMT, emissions would decrease relative to baseline conditions. This reduction in emissions would be due primarily to the reduction in VMT achieved by the more direct route offered by the proposed road connection, relative to other arterials in the vicinity. Because the project would reduce GHG emissions on the roadway network, the project is considered to have a net benefit to the region that would help the City achieve its designated reduction targets.

5.10.4.3 Significance of Impact

Implementation of the proposed project would reduce VMT and associated emissions by providing a direct linkage that is consistent with the mobility goals of the City's General Plan, relevant community plans, and the VMT and emissions reduction targets within the CAP. By reducing GHG emissions relative to conditions without the project in place and by improving local transportation efficiency by providing a new bicycle and pedestrian connection consistent with the CAP's overarching land use and transportation strategy, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.

5.10.4.4 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

5.10.5 Impact Analysis

Issue 2: Plan Consistency

Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

5.10.5.2 Impact Discussion

The regulatory plans and policies discussed in Section 5.10.2 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are thus largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce VMT through land use change and infrastructure investments.

Consistency with State Plans

The AB 32 Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects, although there are several regulatory measures aimed at the identification and reduction of GHG emissions. Most of these measures focus on area source emissions (e.g., energy usage, high-global-warming-potential GHGs in consumer products) and changes to the vehicle fleet (e.g., more fuel-efficient vehicles, reduced VMT, fuel economy). The project would not conflict with these regulations. Rather, the project would facilitate regional reductions in VMT, consistent with the Scoping Plan's transportation goals.

Consistency with Regional Plans

SANDAG's RTP/SCS was adopted to reduce GHG emissions attributable to passenger vehicles in the San Diego region. Although the RTP/SCS does not regulate land use or supersede the exercise of land use authority by SANDAG's member jurisdictions (i.e., the County of San Diego and cities therein), the RTP/SCS is a relevant regional reference document for evaluating the intersection of land use and transportation patterns, and the corresponding GHG emissions. The project would not generate additional trips; rather, the project would result in a redistribution of vehicle trips in the surrounding area. As discussed above, the project would not result in higher VMT when compared to existing traffic conditions. Therefore, the project would not conflict with the underlying assumptions of the RTP/SCS.

Consistency with Local Plans

The City has adopted a CAP for reducing GHG emissions. While the CAP does not include any goals or measures that directly relate to transportation infrastructure projects, the CAP establishes five primary strategies for achieving the goals of the plan. Strategy 1 relates to Energy & Water Efficient Buildings and the CAP Consistency Checklist outlines measures such as green roofs and low-flow water fixtures to reduce energy and water use within new buildings or structures within the City. While the proposed project would not construct any new buildings or structures, landscaping along the proposed roadway would be low-maintenance, low-water plantings that ensure that landscaping irrigation is reduced.

Strategy 2 relates to Clean & Renewable Energy and the CAP Consistency Checklist outlines measures, such as on-site solar systems, for residential and non-residential buildings to utilize. Therefore, this strategy would not be applicable to the proposed project, as it comprises the construction and operation of a roadway connection.

Strategy 3 (Bicycling, Walking, Transit & Land Use) has a number of goals that aim to improve mobility and enhance vehicle fuel efficiency. These cover a broad range of activities that aim to reduce VMT, improve mobility, and enhance vehicle fuel efficiency. Specific implementation measures involve changing land uses, adopting a new perspective on community design, promoting alternative modes of travel, revising parking standards, and managing parking. As previously detailed under Issue 1, the proposed project would reduce regional VMT when compared to baseline conditions. The VMT reductions achieved by the project would be consistent with these goals. In addition, the proposed project would increase connectivity for non-motorists adjacent to a Transit Priority Area. Cyclists and pedestrians would be able to utilize the roadway, as it would include Class II bike lanes and a pedestrian walkway. This roadway would also provide another connection for cyclists and pedestrians within the vicinity of the project site to access the Metropolitan Transit System Trolley Stations in Mission Valley (i.e., Rio Vista and Mission Valley trolley stops).

The primary goal of Strategy 4 (Zero Waste – Gas & Waste Management) is to divert solid waste and capture landfill CH₄ gas emissions. This goal is a Citywide initiative and does not directly relate to the proposed project. Finally, Strategy 5 (Climate Resiliency) calls for further analysis of the resiliency issues that face the various areas of the City, which is also a Citywide initiative. This strategy calls for the implementation of an Urban Tree Planting Program. The proposed project would include native, drought-tolerant landscaping that would include street trees.

Overall, the proposed project would be consistent with the City's CAP, as it would reduce regional VMT and associated GHG emissions. In addition, because the project would reduce GHG emissions relative to baseline conditions, it would not produce emissions greater than that assumed for the community planning area in the CAP's GHG inventory.

5.10.5.3 Significance of Impact

The proposed project would be consistent with applicable State, regional, and local plans and policies for reducing GHG emissions. Accordingly, impacts would be less than significant.

5.10.5.4 Mitigation Measures

Impacts would be less than significant; therefore, no mitigation is required.

This chapter considers the cumulative effects of past, present, and reasonably foreseeable future projects and the proposed project's contribution to these effects. Past projects are defined as those that were recently completed and are now operational. Present projects are defined as those that are under construction but not yet operational. Reasonably foreseeable future projects are defined as those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome.

6.1 Methodology

The discussion of cumulative impacts is guided by State CEQA Guidelines Section 15130, which is summarized as follows.

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable.
- An EIR shall not discuss impacts that do not result in part from the project evaluated in the EIR.
- When the cumulative effect of the project's incremental contribution and the effect of the other projects are not significant, the EIR shall briefly indicate why, based on facts and analysis.
- An EIR may identify a significant cumulative effect but determine that a project's contribution is not cumulatively considerable. The determination may be a result of the project implementing or funding its fair share of mitigation that is designed to alleviate the cumulative impact.
- The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact.

According to Section 15130(b) of the State CEQA Guidelines, cumulative impact analysis may be conducted using one of two methods: the List Method, which includes a list of past, present, and probable activities producing related or cumulative impacts, or the Plan Method, which uses a summary of projections contained in an adopted general plan or related planning document, or a prior environmental document that has been certified, that evaluated regional conditions contributing to the cumulative impact. The cumulative analysis that follows for the majority of issue areas uses the Plan Method but, in many cases, is supplemented by the List Method. The Plan Method is more accurate primarily because the project's Transportation Impact Analysis provides a scenario for the anticipated 2035 condition. This future condition is based on the forecast contained in the San Diego Association of Governments (SANDAG) Series 12 traffic model. As such, the cumulative analyses for long-term transportation impacts as well as long-term traffic-related impacts associated with air quality, greenhouse gas (GHG) emissions, and noise and vibration use the Plan Method.

6.2 List of Cumulative Projects

Based on information provided by the City, 12 cumulative projects were considered in this analysis (Figure 6-1). The projects listed in the cumulative study area have submitted or approved applications, are under construction, or have recently been completed. The cumulative projects identified in the study area are listed in Table 6-1, below. Note that project numbering corresponds to the numbers shown in Figure 6-1.

Table 6-1. Cumulative Projects List

Name	Type	Project Size	ADT	Status (2016)	Notes
1. Quarry Falls (Civita)	Residential Retail Commercial Community Commercial Neighborhood Commercial Commercial Office Recreation Center	4,780 DUs 503,000 sq. ft. 50,000 sq. ft. 50,000 sq. ft. 620,000 sq. ft. 4,000 sq. ft.	52,330	Entitled	Project buildout complete by 2035; phases of active construction
2. Mission Valley Fire Station	Fire Station	16,000 sq. ft.	50	Constructed	Station is open
3. Shawnee Master Plan	Multi-Family Residential Commercial/Retail	996 DUs 30,000 sq. ft.	6,793	Entitled	Not yet constructed
4. Mission Road Townhomes	Multi-Family Residential	55 townhomes	Not known	Proposed, not entitled	Environmental review
5. Hanover Residential—Twain	Residential	374 DUs	7,021	Entitled	Under construction
6. Hanover Residential—Fairmount	Residential	383 DUs			
7. Union Tribune Master Plan	Multi-Family Residential Specialty Retail	200 DUs 3,000 sq. ft.	1,128	Entitled	Not yet constructed
8. Town and Country	Multi-Family Residential Hotel/Convention Center Public Park	840 DUs (-254 rooms)	2,066	Proposed, not entitled	DEIR released for public review
9. Legacy International Center	Timeshare Religious Facility	127 rooms 196,165 sq. ft.	1,805	Proposed, not entitled	DEIR released for public review
10. Camino Del Rio Mixed Use	Multi-Family Residential Office Retail	305 DUs 5,000 sq. ft. 4,000 sq. ft.	1,432	Entitled	Under construction
11. Hazard Center Redevelopment	Residential Commercial/Retail	473 DUs 4,205 sq. ft.	950	Entitled	Not yet constructed
12. Friars Road Multi-Family	Multi-Family Residential (Office)	319 DUs (20,548 sq. ft.)	828	Proposed, not entitled	Environmental review

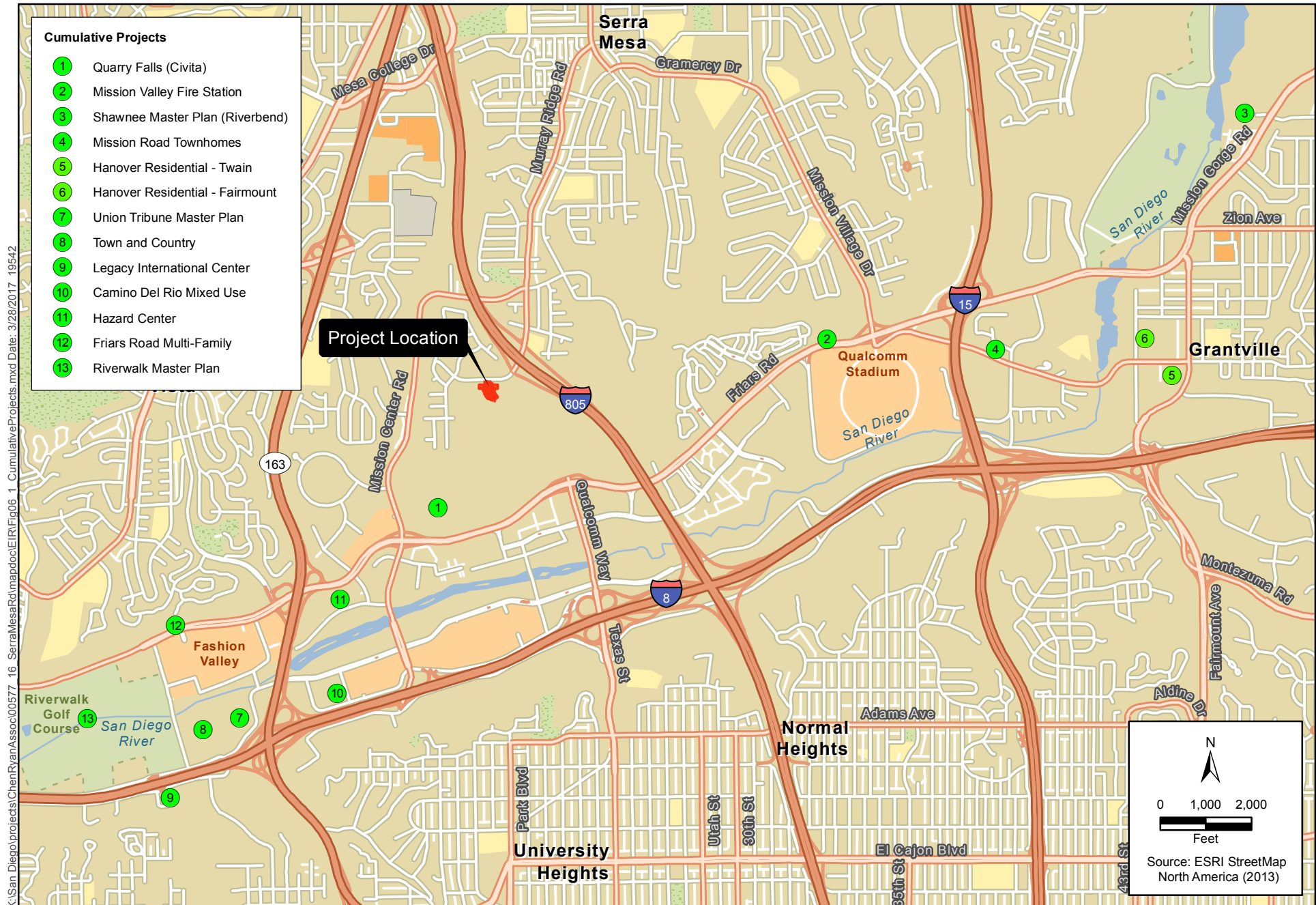


Figure 6-1
Cumulative Projects Location

Name	Type	Project Size	ADT	Status (2016)	Notes
13. Riverwalk Master Plan ¹	Residential Hotel Office Retail	1,329 DUs 1,000 hotel rooms 200,000 sq. ft. 2,582,000 sq. ft.	67,000	Entitled	Not yet constructed

¹ As of May 2015, the Riverwalk Master Plan (formerly Levi-Cushman Specific Plan) proposes to develop 4,000 dwelling units (DUs), 150,000 square feet (sq. ft.) of commercial retail and office space, 950,000 sq. ft. of office space, a 900-room hotel, and a 40-acre park, generating average daily traffic (ADT) of 51,980. This is lower than original specific plan trip ADT generation of 67,000.

6.3 Cumulative Impact Analysis

The discussion below evaluates the potential for the proposed project to contribute to a cumulative adverse impact on the environment. For each resource area, an introductory statement is made regarding what would amount to a significant cumulative impact in a particular resource area. The geographic scope of the area affected by cumulative effects generally varies according to the issue area. The study area for each issue area is described further under the respective resource headings that follow.

The analysis that follows considers two separate impacts: (1) the significance of the cumulative effect from past, present, and reasonably foreseeable projects, and (2) in the event a cumulative effect is identified, the proposed project's incremental contribution to the identified cumulative effect.¹ If it is determined that the proposed project's contribution to the cumulative effect is considerable, feasible mitigation is imposed.

As detailed in Chapter 7, the proposed project would have no impacts on agriculture and forestry resources, energy use, geologic conditions, health and safety, mineral resources, population and housing, public services and facilities, public utilities, and recreation. In addition, as detailed in Section 5.6, *Paleontological Resources*, the project would have no impact on paleontological resources. Therefore, the project has no potential to contribute to cumulative impacts in a manner that would be considered cumulatively considerable. Correspondingly, no additional cumulative analysis is warranted for these resource topics (Section 15130(a)(1) of the State CEQA Guidelines).

6.3.1 Land Use

A cumulatively considerable land use impact would result if the proposed project were to (1) contribute to a significant cumulative impact related a deviation or variance that would in turn result in a physical impact on the environment, (2) conflict with the environmental goals of the community plan in which it would be located, (3) physically divide an established community, (4) conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan, or (5) be incompatible with an adopted Airport Land Use Compatibility Plan (ALUCP). Within

¹ The analysis also considers the rare circumstance of when a significant cumulative effect is not identified from past, present, and probable future projects, but the proposed project's incremental contribution is so large that when its contribution is combined with the less-than-significant cumulative impact, the impact becomes cumulatively significant.

the City, land use categories are established in the General Plan and then refined within each community plan. Conflicts with the community plan could result in a change to the planned land uses and development patterns within the community plan area.

6.3.1.1 Geographic Scope

The geographic scope for the first three issues includes the Serra Mesa and Mission Valley Community Plan areas because these are the local plans that provide land use designations and long-term buildout blueprints for the respective communities in which the project would be located. For the fourth issue, the cumulative study area is the City's MSCP Subarea Plan area, whereas the study area for the fifth issue is the area covered by the Montgomery Field ALUCP.

6.3.1.2 Cumulative Effects

The General Plan and community plans within the City provide land use designations and long-term buildout blueprints for the respective communities. Development projects that propose deviations or variances from these plans have the potential to cumulatively contribute to the planned character of the communities. Development projects throughout the past few decades, current proposed projects (see Table 6-1), and probable future projects have and will likely continue to propose deviations, variances, or amendments to the Mission Valley Community Plan. For example, cumulative projects such as the Quarry Falls (#1), Union Tribune Master Plan (#6), Town and Country Redevelopment (#7), Legacy International Center (#8), and Hazard Center Redevelopment (#10) projects included deviations/variations from development regulations and/or amendments to the Mission Valley Community Plan.

Past actions have altered development patterns within the community, and it is foreseeable that future actions will continue to do so. However, projects will be required to demonstrate consistency with the guiding vision of the general plan, which sets forth a "city of villages" strategy that aims to concentrate density in parts of the city that are considered appropriate, such as community areas like those within Mission Valley that are adjacent to existing transit and jobs. Furthermore, all projects that require a discretionary permit must demonstrate that a deviation or variance from existing regulations will not cause a significant impact on the environment or require mitigation. For example, if a project were to exceed development regulations that, in turn, cause significant traffic impacts on the circulation system, the project would be required to mitigate those impacts through fees or other feasible measures.

None of the development projects identified in Table 6-1 propose increased density within the Serra Mesa Community Plan area, which is primarily a low-density residential area. However, the Serra Mesa community is bordered by other areas that have seen an increase in growth, including Mission Valley and the Grantville area (see Table 6-1). The Serra Mesa Community Plan calls for the protection of open space areas, canyons, and steep slopes. These regulations are enforced through the City's Environmentally Sensitive Lands Regulations as well as the MSCP Subarea Plan.

Cumulative projects would be required to fully mitigate impacts related to the MSCP Subarea Plan and the Montgomery Field ALUCP prior to approval. For example, any project that impacts sensitive habitat within the Multi-Habitat Planning Area would be required to show in-kind mitigation, such as off-site acquisition, prior to any project approval. Similarly, if a project were to propose a use that conflicts with the Montgomery Field ALUCP, such as a tall building that interferes with flight paths,

mitigation would be required by the Airport Land Use Commission and the City prior to project approval.

Therefore, although historical development over the decades has increased density in Mission Valley and Grantville, and reasonably foreseeable future projects will continue this path of development, changes from past, present, and reasonably foreseeable future projects have been and will continue to be in compliance with existing regulations set forth in the general plan and applicable community plans. Although historical development has not significantly increased the density in the Serra Mesa community, any proposed development that would exceed the community plan's land use designations would require a Community Plan Amendment. It would also be required to mitigate for any impacts associated with growth that would exceed such regulations. As previously detailed, projects are required to demonstrate conformance with the MSCP Subarea Plan and the Montgomery Field ALUCP. Consequently, a cumulatively significant impact from past, present, and reasonably foreseeable future projects is not present.

6.3.1.3 Project Contribution

As discussed in Section 5.1, *Land Use*, the project would not require deviation or a variance from development regulations and would be consistent with the land use designations and zoning. The proposed project would not increase density because it would not include any buildings for residential, commercial, or industrial uses. As demonstrated in Tables 5.1-1 and 5.1-2, the proposed project would be consistent with applicable policies set forth in the general plan, Serra Mesa Community Plan, and Mission Valley Community Plan.

The proposed project would not divide existing communities. It would provide a roadway connection close to regional roadways and freeways (I-805) that, if constructed, would provide a direct connection between the Serra Mesa and Mission Valley community planning areas and more access options for regional trips. Serra Mesa and Mission Valley are currently somewhat divided in the vicinity of the project site because of intervening topography and steep slopes. As such, the street connection between the two adjacent communities would help link them and would not incrementally contribute to a cumulative impact regarding community division.

As detailed in Section 5.1, *Land Use*, the proposed project would not conflict with any regulations set forth in the Montgomery Field ALUCP. The proposed project would not include construction of vertical structures that would conflict with overflight zones or land uses established within the Montgomery Field ALUCP, nor would it otherwise interfere with existing aircraft operations. Therefore, it would not incrementally contribute to a cumulative impact regarding inconsistency with the Montgomery Field ALUCP.

The proposed project would not affect any sensitive habitat within the Multi-Habitat Planning Area and therefore would not conflict with the MSCP Subarea Plan.

Because other past, present, and reasonably foreseeable future projects identified in Table 6-1 have not resulted in a significant land use impact and a cumulatively significant impact does not exist, the proposed project would not result in an impact such that a cumulatively significant impact would be created, and the project's contribution to land use impacts would be less than cumulatively considerable.

6.3.1.4 Level of Significance Prior to Mitigation

The proposed project's incremental contribution to cumulative impacts related to land use would not be cumulatively considerable.

6.3.1.5 Mitigation Measures

No mitigation is required.

6.3.2 Transportation and Circulation

Cumulatively considerable impacts on transportation and circulation could result when past, present, and reasonably foreseeable future projects combine to result in unacceptable roadway, intersection, or freeway ramp operations or contribute to traffic hazards. A significant impact on roadway segment or intersection operations would occur if the proposed project were to cause a segment or intersection to degrade to level of service (LOS) E or LOS F. These impacts were previously detailed within Issue 3 of Section 5.2, *Transportation and Circulation*. However, they are summarized below.

Impacts on segments, intersections, or freeways would occur if any of the criteria in Table 6-2 were to be exceeded. Impacts on alternative transportation modes are also considered. This includes determining whether adequate pedestrian, bicycle, and mass transit facilities are available. In addition, recent interim guidance issued by the California Department of Transportation (Caltrans) now advises using vehicle miles traveled (VMT) to determine if a project would have a significant impact on a Caltrans freeway segment within Caltrans' jurisdiction.

Table 6-2. City of San Diego Measure of Significant Project Traffic Impacts

LOS with Project	Allowable Change Due to Impact					
	Freeways		Roadway Segments		Intersections	Ramp Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (seconds)	Delay (minutes)
E (or ramp meter delays above 15 min)	0.01	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 min)	0.005	0.5	0.01	0.5	1.0	1.0

Source: City of San Diego 2016.
LOS = level of service; mph = miles per hour; V/C = volume-to-capacity ratio

6.3.2.1 Geographic Scope

The geographic scope for cumulative transportation and circulation impacts includes all intersections and roadway segments to which the project would contribute 50 or more peak-hour trips in the Near-Term (Year 2017) and Long-Term (Year 2035) scenarios. It should be noted that the traffic generated from the cumulative projects identified in Table 6-1 were included in both scenarios. In addition, the Long-Term (Year 2035) scenario represents the planned transportation

system with the projected buildout conditions of the traffic study area, including the Mission Valley and Serra Mesa community plans.

6.3.2.2 Cumulative Effects

Roadway Capacity

Although the cumulative effects of the project were previously detailed in Section 5.2, *Transportation and Circulation*, they are summarized in this section. The baseline conditions of the Near-Term (Year 2017) and Long-Term (Year 2035) scenarios represent the traffic conditions within the study area without the project. Tables referenced below can be found in Section 5.2.

Near-Term (Year 2017) Baseline Conditions

Tables 5.2-10 through 5.2-13 show the baseline conditions for the Near-Term (Year 2017) scenario. As shown in Table 5.2-10, the following two roadway segments would operate at an unacceptable level of service (LOS).

- Mission Center Road from Aquatera Driveway to Murray Ridge Road
- Murray Ridge Road from the I-805 northbound (NB) ramp to Mission Center Road

As shown in Table 5.2-11, none of the intersections operate at an unacceptable LOS in the Near-Term baseline condition. As shown in Table 5.2-13, no freeway ramp meters would operate at an unacceptable delay (15 minutes or more) in the near-term baseline condition.

As detailed in Appendix H to this DEIR, the VMT for the study area for the Near-Term (Year 2017) baseline condition is 531,382, while the region-wide total (i.e., San Diego region) is 1,523,630.

Long-Term (Year 2035) Baseline Conditions

Tables 5.2-16 through 5.2-19 show the baseline conditions for the Long-Term (Year 2035) scenario.

As shown in Table 5.2-16, in the baseline condition, the following six roadway segments would operate at an unacceptable LOS.

- Mission Center Road from Aquatera Driveway to Murray Ridge Road
- Murray Ridge Road from the I-805 NB ramp to Mission Center Road
- Murray Ridge Road from Mission Center Road to Pinecrest Avenue
- Murray Ridge Road from Pinecrest Avenue to Sandrock Road
- Phyllis Place from the I-805 southbound (SB) ramp to the I-805 NB ramp
- Rio San Diego Drive from Qualcomm Way to Rio Bonito Way

As shown in Table 5.2-17, the following five intersections would operate at an unacceptable LOS in the Long-Term (Year 2035) baseline condition:

- Friars Road and Northside Drive (LOS E, PM peak hour)
- Mission Center Road and Murray Ridge Road/Phyllis Place (LOS E and F, AM and PM peak hour, respectively)
- Murray Ridge Road and the I-805 SB ramp (LOS E, PM peak hour)

- Qualcomm Way and Friars Road eastbound (EB) ramp (LOS E, PM peak hour)
- Qualcomm Way and Friars Road westbound (WB) ramp (LOS F, PM peak hour)

As shown in Table 5.2-18, no freeway ramps in the baseline condition would operate with more than 15 minutes of delay.

As detailed in Appendix H to this DEIR, the baseline condition VMT within the study area would be 733,403 in Year 2035. Region-wide, the VMT prior to consideration of the project's contribution would be 1,633,653 in Year 2035.

Therefore, because roadway segments and intersections are projected to operate at an unacceptable LOS, the cumulative effect of past, present, and reasonably foreseeable future projects would result in a cumulatively significant transportation and circulation impact.

Traffic Hazards

There are no existing traffic hazards within the vicinity of the project site, including along Phyllis Place or any roadways within Quarry Falls.

6.3.2.3 Project Contribution

Roadway Capacity

As previously detailed within Issues 1, 2, and 3 of Section 5.2, *Transportation and Circulation*, traffic that would be redistributed under the proposed project was added to the Near-Term and Long-Term traffic model to determine impacts on roadway segments, intersections, and freeway ramp meters.

Table 6-2 summarizes the transportation facilities that would be significantly affected by the proposed project in the Near-Term (2017) scenario.

Table 6-2. Summary of Near-Term (Year 2017) Impacts on Roadways, Intersections, and Metered Freeway On-Ramps

Impact Number	Impact Location
Roadway Segments	
Impact TRAF-1	Murray Ridge Road, from Mission Center Road to Pinecrest Avenue
Impact TRAF-2	Murray Ridge Road, from Pinecrest Avenue to Sandrock Road
Impact TRAF-3	Phyllis Place, from Franklin Ridge Road to I-805 SB ramps
Impact TRAF-4	Phyllis Place, from I-805 SB ramps to I-805 NB ramps
Intersections	
Impact TRAF-5	Murray Ridge Road and I-805 NB ramps
Impact TRAF-6	Murray Ridge Road and I-805 SB ramps
Impact TRAF-7	Qualcomm Way and Friars Road WB

An analysis of the regional VMT was conducted with the implementation of the proposed roadway connection. The modeled VMT with the roadway connection under the Near-Term Scenario (Year 2017) within the study area is 521,826. This represents a 1.8 percent decrease of VMT within

the study area. With the proposed project, the region-wide VMT total is 1,518,696, a decrease of 0.32 percent. Therefore, as the proposed project would reduce VMT, impacts associated with freeway mainline segments would be less than significant.

Table 6-3 summarizes the transportation facilities that would be significantly affected by the proposed project in the Long-Term (2035) scenario.

Table 6-3. Summary of Long-Term (Year 2035) Impacts on Roadways, Intersections and Metered Freeway On-Ramps

Impact Number	Impact Location
Roadway Segments	
Impact TRA-8	Franklin Ridge Road from Via Alta to Civita Boulevard
Impact TRA-9	Murray Ridge Road from Mission Center Road to Pinecrest Avenue
Impact TRA-10	Murray Ridge Road from Pinecrest Avenue to Sandrock Road
Impact TRA-11	Phyllis Place from Franklin Ridge Road to I-805 SB ramps
Impact TRA-12	Phyllis Place from I-805 SB ramps to I-805 NB ramps
Impact TRA-13	Rio San Diego Drive from Qualcomm Way to Rio Bonito Way
Intersections	
Impact TRA-14	Murray Ridge Road and Sandrock Road
Impact TRA-15	Murray Ridge Road and I-805 NB ramps
Impact TRA-16	Murray Ridge Road and I-805 SB ramps
Impact TRA-17	Via Alta and Franklin Ridge Road
Metered Freeway On-Ramps	
Impact TRA-18	I-805 SB ramp at Murray Ridge Road

With the proposed project, VMT within the study area would be 720,196, a 1.8 percent decrease in VMT when compared to the baseline condition in Year 2035. Region-wide, the VMT with the project would be 1,629,137, a 0.28 percent decrease compared to the baseline condition in Year 2035. Therefore, as the proposed project would reduce VMT within the study area and the region, impacts would be less than significant.

As summarized in the tables above, the proposed project would result in significant impacts on study area roadway segments, intersections, and a freeway ramp meter. The project would contribute significant impacts to an area that would experience significant impacts even without the project. Therefore, the project's contribution would be cumulatively considerable.

Traffic Hazards

Traffic hazards associated with projects are typically localized near the project site, as is the case with the proposed project. The proposed project would contribute to a cumulatively significant impact if the project contributed to a traffic hazards within the cumulative study area. The proposed project would result in inadequate sight distance for motorists exiting the City View Church driveway if the driveway cannot ultimately be relocated. Therefore, the project's contribution would be cumulatively considerable.

6.3.2.4 Level of Significance Prior to Mitigation

The project would contribute significant impacts to an area that would experience significant impacts even without the project. Therefore, the project's contribution would be cumulatively considerable and mitigation would be required to reduce the project's contribution to a level determined to be less than cumulatively considerable.

6.3.2.5 Mitigation Measures

Within Section 5.2, *Transportation and Circulation*, of this DEIR, Section 5.2.4.3 (Near-Term scenario) and Section 5.2.5.3 (Long-Term scenario) detail the mitigation measures for impacts on roadway segments, intersections, and freeway ramp meters; however, they are summarized below.

Roadway Capacity

Near-Term Scenario

Table 6-4 shows the mitigation measures for this scenario.

Table 6-4. Summary of Near-Term (Year 2017) Mitigation Measures

Roadway Segments	MM-TRAF-1: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Mission Center Road to Pinecrest Avenue to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.
	MM-TRAF-2: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped from Pinecrest Avenue to Sandrock Road to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.
	MM-TRAF-3: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be widened from Franklin Ridge Road to I-805 SB ramps to accommodate five total lanes (three EB and two WB), including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.
	MM-TRAF-4: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place shall be restriped from I-805 SB ramps to I-805 NB ramps to accommodate a total of five lanes. The new classification for this segment of Phyllis Place will be a four-lane Collector.
Intersections	MM-TRAF-5: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.

MM-TRAF-6: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.

MM-TRAF-7: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the Qualcomm Way and Friars Road WB ramps intersection shall be reconfigured with the following improvements: the SB approach shall be widened to accommodate two through lanes and one exclusive right-turn lane; the NB approach shall be restriped to accommodate two through lanes and two left-turn lanes; and the WB on-ramp shall be widened to accommodate two receiving lanes.

Long-Term Scenario

Table 6-5 shows the mitigation measures for this scenario.

Table 6-5. Summary of Long-Term (Year 2035) Mitigation Measures

Roadway Segments	<p>MM-TRAF-8: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Franklin Ridge Road shall be widened to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Franklin Ridge Road would be a four-lane Collector.</p>
	<p>MM-TRAF-9: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road from Mission Center Road to Pinecrest Avenue shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.</p>
	<p>MM-TRAF-10: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Murray Ridge Road shall be restriped to accommodate two lanes in each direction and a center left-turn lane. The new classification for this segment of Murray Ridge Road will be a four-lane Collector.</p>
	<p>MM-TRAF-11: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from Franklin Ridge Road to I-805 SB ramp shall be reconfigured to accommodate five total lanes (three EB and two WB), including a median. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.</p>
	<p>MM-TRAF-12: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, Phyllis Place from I-805 SB ramp to I-805 NB ramp shall be restriped to accommodate five total lanes. The new classification for this segment of Phyllis Place will be a five-lane Major Arterial.</p>
	<p>MM-TRAF-13: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the segment of Rio San Diego Drive from Qualcomm Way to Rio Bonito Way shall be reconfigured to include the necessary median commensurate with a four-lane Major Arterial.</p>
Intersections	<p>MM-TRAF-14: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the left-turn lanes in both the NB and SB directions will allow both through movements and left turns.</p>

MM-TRAF-15: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the NB off-ramp approach shall be restriped, the EB approach shall be restriped, the WB approach shall be reconfigured, and the NB on-ramp approach shall be widened.

MM-TRAF-16: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, at the intersection, the EB approach shall be widened to accommodate two through lanes and an exclusive right-turn lane, the SB on-ramp shall be widened, and the SB off-ramp shall be widened to accommodate one share-through-left lane and two exclusive right-turn lanes.

MM-TRAF-17: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, this intersection shall be reconfigured such that the EB through/right-turn lane will be converted to a left/through/right-turn lane to account for additional EB to NB traffic.

Freeway Ramp Meters	MM-TRAF-18: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the applicant shall contribute a fair share contribution, in coordination with Caltrans, which would be applied toward an additional regular traffic ramp lane on the I-805 SB on-ramp from Murray Ridge Road.
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Traffic Hazards

MM-TRAF-19: Prior to the commencement of any grading activities or, if a grading permit is required, prior to issuance of a grading permit, the City View Church driveway shall be relocated as part of the four-way intersection design with the proposed roadway connection and Phyllis Place.

Implementation of this measure would reduce the impact to a level below significance; however, the City's ability to implement this measure may be limited. The City View Church is a privately owned property. The relocation of the driveway may in turn require the removal of trees and the reconfiguration of other internal access considerations within the Church property, such as the drop-off area in front of the church that is connected to the existing driveway. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

6.3.2.6 Level of Significance after Mitigation

Near-Term Scenario

As shown in Table 5.2-15, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments. However, this analysis assumes that the mitigation measures would not be implemented (for the reasons detailed in Section 5.2.4.3) at the following segments:

- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-1**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-2**)

Therefore, impacts at these segments under the Near-Term scenario would be cumulatively considerable and unavoidable.

Table 5.2-14 shows the post-mitigation measure LOS. As shown, mitigation would improve LOS at the following impacted segments to an acceptable level.

- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-3**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-4**)

Therefore, impacts at these segments under the Near-Term scenario would be not be cumulatively considerable after mitigation.

As shown in Table 5.2-15, mitigation would improve LOS at the following intersections to an acceptable level:

- Murray Ridge Road/I-805 NB ramps(**Impact TRAF-5**)
- Murray Ridge Road/I-805 SB ramps (**Impact TRAF-6**)
- Qualcomm Way/Friars Road WB ramp (**Impact TRAF-7**)

Therefore, intersection impacts under the Near-Term scenario at these locations would not be cumulatively considerable after mitigation.

Long-Term Scenario

As shown in Table 5.2-20, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments. However, this analysis assumes that the mitigation measures would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following segments:

- Franklin Ridge Road, from Via Alta to Civita Boulevard (**Impact TRAF-8**)
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-9**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-10**)
- Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way (**Impact TRAF-13**)

Therefore, impacts at these segments under the Long-Term scenario would be cumulatively considerable and unavoidable.

As shown in Table 5.2-20, mitigation would improve LOS at the following segments to an acceptable level:

- Phyllis Place, from Franklin Ridge Road to I-805 SB ramps (**Impact TRAF-11**)
- Phyllis Place, from I-805 SB ramps to I-805 NB ramps (**Impact TRAF-12**)

Therefore, impacts at these segments under the Long-Term scenario would not be cumulatively considerable after mitigation.

As shown in Table 5.2-22, if mitigation were fully implemented, there would be less-than-significant impacts at the following intersection. However, this analysis assumes that the mitigation measure would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following intersection:

- Murray Ridge Road and Sandrock Road (**Impact TRAF-14**)

Therefore, impacts at this intersection under the Long-Term scenario would be cumulatively considerable and unavoidable.

As shown in Table 5.2-21, mitigation would improve LOS at the following intersections; however, it would not be reduced to an acceptable level at the following intersections in the PM peak hour.

- Murray Ridge Road/I-805 NB ramps; PM peak hour (**Impact TRAF-15**)
- Murray Ridge Road/I-805 SB ramps; PM peak hour (**Impact TRAF-16**)

Therefore, impacts at these intersections in the PM peak hour under the Long-Term scenario would be cumulatively considerable and unavoidable.

As shown in Table 5.2-21, mitigation would improve LOS at the following intersections to an acceptable level.

- Via Alta/Franklin Ridge Road; PM peak hour (**Impact TRAF-17**)

Therefore, impacts at these intersections in the respective peak hours under the Long-Term scenario would not be cumulatively considerable after mitigation.

Table 5.2-22 shows the post-mitigation measure LOS for impacted freeway ramp meters. As shown, mitigation would improve delay at the following ramp meter to an acceptable level.

- I-805 SB on-ramp at Murray Ridge Road (**Impact TRAF-18**)

Therefore, impacts at this ramp meter under the Long-Term scenario would not be cumulatively considerable after mitigation.

Traffic Hazards

If mitigation were fully implemented, traffic hazard impacts would be reduced to less-than-significant levels. However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be cumulatively considerable and unavoidable.

6.3.3 Air Quality

Cumulatively considerable air quality impacts would result when cumulative projects' emissions would combine to (1) degrade air quality conditions to levels that would be below attainment levels for the San Diego Air Basin (SDAB), (2) delay attainment of air quality standards, (3) affect sensitive receptors, or (4) subject surrounding areas to objectionable odors. Neither the City nor San Diego Air Pollution Control District (SDAPCD) have established quantitative thresholds for determining whether a project's incremental contribution to emissions would be cumulatively considerable. Therefore, the City's and County of San Diego's screening-level thresholds for cumulative air quality impacts, based on SDAPCD Rule 20.1 for non-major stationary sources, are used for the analysis of impacts related to emissions from proposed project construction and operations, as evaluated within the context of past, present, and reasonably foreseeable future projects. Substantial evidence for using City and SDAPCD threshold levels for this project is contained within Section 5.3.3.2 of this DEIR.

6.3.3.1 Geographic Scope

The SDAB, which covers 4,260 square miles of Southern California and is contiguous with San Diego County, represents the geographic scope for cumulative air quality impacts related to consistency with air quality plans and air quality threshold levels. This is because plans and thresholds are established at the air basin level to provide air quality standards for the entire air basin, which, in this case, is the entire county. Cumulative impacts on sensitive receptors, including impacts from

odors, are considered at a more localized level because of the more limited area of dispersion. This may include surrounding neighborhoods and areas close to the sources of the emissions and odors.

6.3.3.2 Cumulative Effects

Past projects within the SDAB have involved emissions of ozone precursors (reactive organic gases [ROG] and nitrogen oxides [NO_x]), particulate matter 10 micrometers or less in diameter (PM₁₀), and particulate matter 2.5 micrometers or less in diameter (PM_{2.5}), resulting in nonattainment status (see Section 5.3, *Air Quality*) for the 8-hour ozone standard under the National Ambient Air Quality Standards (NAAQS) as well as nonattainment status for ozone, PM₁₀, and PM_{2.5} under the California Ambient Air Quality Standards (CAAQS). Therefore, the emissions of concern within the SDAB are ozone precursors (ROG and NO_x), PM₁₀, and PM_{2.5}. The nonattainment status for the entire county is a consequence of past and present projects and subject to continued nonattainment status as a result of the cumulative contribution of reasonably foreseeable future projects within the county, such as those listed in Table 6-1. However, the only reasonably foreseeable future project within 1,000 feet that could have impacts on localized air quality conditions is the Quarry Falls project (cumulative project #1). Overall, the cumulative air quality impact from past, present, and reasonably foreseeable future projects is significant.

6.3.3.3 Project Contribution

As discussed under Issue 1 of Section 5.3, the proposed project would not include any structures or development that would generate population growth; therefore, it would not exceed the growth projections in the general plan or SANDAG's regional growth projections. Additionally, the proposed project would not include trip-generating uses (e.g., residential or commercial units), and its implementation would reduce VMT compared to existing traffic conditions. The proposed project would be consistent with the local general plan and SANDAG's growth projections and, as such, would be considered consistent at a regional level with the underlying growth forecasts in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). The RAQS and SIP are designed to bring the SDAB into attainment status for state and federal ozone standards. Therefore, although there is a significant cumulative impact from past, present, and reasonably foreseeable future projects, resulting in nonattainment status for some criteria pollutants in the air basin, the proposed project's incremental contribution to cumulative air emissions would not conflict with progress toward attainment of the air quality standards described in the RAQS and SIP.

As discussed under Issue 2 and shown in Table 5.3-5 of Section 5.3, *Air Quality*, criteria pollutant emissions would be below SDAPCD trigger levels for all pollutants during construction. Although the effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, the proposed project's incremental contribution from construction emissions would not result in a net increase in nonattainment pollutants because it would not exceed SDAB's cumulative impact thresholds during project construction. Moreover, possible cumulative impacts on air quality as a result of these combined activities would be addressed by standard SDAPCD measures, which apply to construction projects, including fugitive dust control, per Rule 55. Once operational, the proposed road connection would offer a more direct route and divert traffic from other arterials in the vicinity, resulting in reduced criteria pollutant emissions relative to no-project and existing conditions. Consequently, the proposed project's incremental contribution to this cumulative air quality impact would not be cumulatively considerable.

In analyzing cumulative operational emissions from the proposed project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SDAB is designated as nonattainment for the CAAQS and NAAQS. If the future implementation of the project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality if the emissions from the construction, in combination with the emissions from other proposed or reasonably foreseeable future projects, are in excess of established thresholds. However, the proposed project would be considered to have only a significant cumulative impact if the future construction's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact).

Operation of the proposed project would result in a decrease in VMT, as compared to existing traffic conditions (see Section 5.3.5). As such, the proposed project would reduce criteria pollutant emissions, relative Long-Term (i.e. cumulative) conditions. This result would be a regional and long-term air quality benefit.

As discussed under Issue 3 in Section 5.3.6, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during construction or operation. Although diesel-powered equipment would generate diesel particulate matter, construction would be short term. Emissions would dissipate as a function of distance and, therefore, be lower at the nearest sensitive receptor. Off-road diesel construction equipment and heavy-duty diesel trucks, which would be used at both the project site and during construction of the Quarry Falls project (cumulative project #1), are regulated under three Airborne Toxic Control Measures. Although the redistribution of vehicle trips may move traffic closer to receptors adjacent to the road connection, the diverted traffic would predominantly be passenger vehicles, which are not a significant source of diesel emissions. Similarly, the project would not create a carbon monoxide hotspot. Therefore, the proposed project's incremental contribution to this cumulative health risk impact would not be cumulatively considerable.

6.3.3.4 Level of Significance Prior to Mitigation

The proposed project's incremental contribution to cumulative impacts related to air quality would not be cumulatively considerable.

6.3.3.5 Mitigation Measures

No mitigation is required.

6.3.3.6 Level of Significance After Mitigation

The proposed project's incremental contribution to cumulative impacts related to air quality would not be cumulatively considerable and therefore would be less than significant.

6.3.4 Noise

A cumulatively considerable impact from noise and vibration would result if the proposed project were to contribute to cumulative impacts related to (1) exceedances of noise standards, (2) ground-borne vibration, or (3) substantial ambient noise levels when evaluated within the context of past, present, and reasonably foreseeable future projects. Impacts related to air traffic noise were

determined to have no impact at the project level; therefore, cumulative impacts related to air traffic noise were not evaluated.

6.3.4.1 Geographic Scope

The study area for the cumulative noise impact analysis is defined as the area within a 1,000-foot radius of the project site.

6.3.4.2 Cumulative Effects

In general, noise is a highly localized effect. A noise source operating close to a receiver will tend to dominate the noise environment at that receiver, and any similar sources operating at distances of 1,000 feet or more would typically have a negligible effect on the overall noise level at the receiver. Thus, there is typically no meaningful cumulative effect created by two noise sources that are separated by 1,000 feet. The only project listed within Table 6-1 within 1,000 feet of the project site is the Quarry Falls project. The Quarry Falls site is undergoing various phases of active construction; therefore, the potential exists for construction to occur within 1,000 feet of the proposed project. However, the Quarry Falls project is required to comply with the mitigation measures set forth in the Quarry Falls PEIR as well as existing City regulations, including the Noise Ordinance. Consequently, a cumulatively significant impact from past, present, and reasonably foreseeable future projects is not present.

Concerning the existing cumulative ambient noise environment, ambient noise in the vicinity of the project site is generated primarily by traffic along I-805 as well as arterial roadways in the project vicinity. The existing ADT volume along Phyllis Place is 2,420 trips. The existing ADT volume along Friars Road between I-805 and Qualcomm Way is 36,466 trips. As detailed in Section 5.4, *Noise*, the measured average noise level (L_{eq}) within the vicinity of the project site ranges from 52 A-weighted decibels (dBA) L_{eq} at Site M2 to 62 dBA L_{eq} at Site M3. With regard to existing traffic noise, several receivers in the vicinity of the project site were modeled. The noise levels ranged from 54 dBA L_{eq} at a future residence west of the proposed roadway to 69 dBA L_{eq} at a residence adjacent to Mission Center Road.

Construction vibration effects are highly localized, as well. Vibration from construction activities is assessed using instantaneous vibration (peak particle velocity), which is typically caused by distinct events from a single piece of equipment. As previously detailed, the only localized cumulative project is Quarry Falls, which is directly adjacent to the project site. As described in its PEIR, Quarry Falls is a phased project, which can lead to previously constructed uses experiencing the effects of ongoing construction (including ground-borne vibration). However, the Quarry Falls PEIR required mitigation to reduce potential impacts from construction, including a requirement to prepare and implement a noise mitigation plan that identifies temporary noise barriers, restricts heavy equipment, and increases setback distances (Quarry Falls PEIR, page 5.5-15). Consequently, a cumulatively significant impact from past, present, and reasonably foreseeable future projects is not present.

6.3.4.3 Project Contribution

As previously detailed in Section 5.4, *Noise*, the proposed project would be required to adhere to mitigation measure **MM-NOI-1** in order to reduce potentially significant construction noise impacts to less-than-significant levels. As previously described, the only reasonably foreseeable future project within 1,000 feet of the project site is the Quarry Falls project. The Quarry Falls project is

similarly required to adhere to existing regulations and mitigation measures detailed within the Quarry Falls PEIR (see Section 5.5 of the Quarry Falls PEIR).

Potential cumulative impacts are analyzed as part of the traffic noise analysis included in Table 5.4-7 (see Section 5.4, *Noise*). Estimated long-term traffic noise levels include the cumulative effects of the proposed project and any other related projects in the vicinity. Referring to Table 5.4-7, long-term traffic noise levels are estimated to range from 58 to 70 decibels (dB) Community Noise Equivalent Level (CNEL) without the project and 59 to 71 dB CNEL with the project. For all receivers except R3, R7, and R11, noise levels would increase by less than 3 dB relative to existing conditions. At R3, representing residential land uses adjacent to Civita Boulevard, the estimated cumulative traffic noise increase would be 3 dB (increasing from 58 to 61 dB CNEL); at R7, representing future residential land uses west of the proposed roadway extension, the estimated cumulative traffic noise increase would be 5 dB (increasing from 54 to 59 dB CNEL); and at R11, representing residential land uses adjacent to Via Alta, the estimated cumulative traffic noise increase would be 3 dB (increasing from 60 to 63 dB CNEL). Cumulative traffic noise with the proposed project is estimated to result in one exceedance of the City of San Diego's 65 dBA CNEL exterior noise standard (at R8, adjacent to Qualcomm Way and south of Friars Road), but the associated increase would be less than 3 dBA. Cumulative traffic would not result in an exceedance of the City of San Diego's exterior noise standard of 70 dB CNEL for churches. Therefore, the project's incremental contribution to significant cumulative operational noise impacts from past, present, and reasonably foreseeable future projects would be less than cumulatively considerable.

6.3.4.4 Level of Significance Prior to Mitigation

Prior to mitigation, cumulative impacts related to construction noise would be potentially significant. Operational (traffic-related) noise impacts would be less than significant.

6.3.4.5 Mitigation Measures

Mitigation measure **MM NOI-1**, as described in Section 5.4, *Noise*, shall be implemented.

6.3.4.6 Level of Significance After Mitigation

The project's contribution to cumulative construction noise would not be cumulatively considerable with mitigation incorporated.

6.3.5 Biological Resources

A cumulatively considerable impact on biological resources would result if the proposed project were to contribute to cumulative impacts related to (1) sensitive habitat or species, (2) sensitive habitat/natural communities, (3) federally protected wetlands, or (4) wildlife movement corridors.

6.3.5.1 Geographic Scope

The geographic area for biological resources includes Mission Valley and Serra Mesa. Biological resources can have commonalities across a large regional area while also having very unique and specific characteristics in certain locations. In Mission Valley and Serra Mesa, the dense urbanized setting creates limited habitat opportunities, and biological resources tend to be fairly isolated, with areas of connectivity restricted to a few linear features, such as the canyons within Serra Mesa and the San Diego River in Mission Valley. Present and reasonably foreseeable future projects that could

contribute to cumulative impacts on biological resources are projects that include grading, paving, landscaping, road construction, and building construction.

6.3.5.2 Cumulative Effects

The project site and surrounding areas within Mission Valley and Serra Mesa have been transformed by historical development projects that represent the urban development seen today. Present and future projects will continue to urbanize the area. The sensitive biological resources that remain within these communities and throughout the city are protected by the City's MSCP Subarea Plan; present and future projects would be required to be consistent with the plan. Moreover, present and future projects would comply with the requirements of the Migratory Bird Treaty Act, which contains regulations pertaining to take, including feathers, nests, or eggs. It would also require present and future projects to avoid and/or mitigate potential impacts on any nesting birds.

6.3.5.3 Project Contribution

As discussed in Section 5.5, *Biological Resources*, the proposed project would directly affect 0.25 acre of disturbed coastal sage scrub, a Tier II sensitive upland habitat, pursuant to the MSCP Subarea Plan. This is a significant impact that would require mitigation. Additionally, there is moderate potential for birds that are protected under the federal Migratory Bird Treaty Act to be significantly affected, which would also require mitigation. Implementation of the mitigation detailed in Section 5.5 would ensure that sensitive habitat would have adequate protection, in compliance with the City's MSCP Subarea Plan, thereby ensuring a regional conservation effort and the protection of sensitive biological resources. Mitigation would also ensure compliance with the Migratory Bird Treaty Act, which all development projects are required to comply with.

The project site is not part of a wildlife corridor and therefore it would not contribute to the incremental loss of a regional wildlife corridor. Therefore, the project's incremental contribution to wildlife corridor impacts from past, present, and reasonably foreseeable future projects would be less than cumulatively considerable.

6.3.5.4 Level of Significance Prior to Mitigation

Impacts related to sensitive habitat and migratory birds would be potentially cumulatively significant.

6.3.5.5 Mitigation Measures

Mitigation detailed in Section 5.5, including mitigation measures **MM-BIO-1** and **MM-BIO-2**, would also mitigate cumulative impacts associated with sensitive habitat and migratory birds.

6.3.5.6 Level of Significance after Mitigation

Implementation of mitigation measures **MM-BIO-1** and **MM-BIO-2** would reduce cumulative impacts to less than significant.

6.3.6 Historical and Tribal Cultural Resources

The project would have a significant impact requiring mitigation if its contribution to a cumulatively significant impact associated with the loss or destruction of historical and tribal cultural resources is considerable in relation to the cumulatively significant impact.

6.3.6.1 Geographic Scope

The geographic scope of analysis for cumulative historical resource impacts depends on the type of resource but generally includes the Mission Valley and Serra Mesa areas. For instance, prehistoric and paleontological resources could be located within any of the natural landforms that surround the project site. Historical archaeological or Tribal Cultural Resources could be present within the surrounding artificial soils and fill. Impacts on buried archaeological resources generally occur from ground-disturbing activities, such as grading and dredging, while impacts on the historic built environment typically result from modification, relocation, and demolition of existing structures.

6.3.6.2 Cumulative Effects

Historical development within Mission Valley and Serra Mesa represents the urban development seen today. As discussed in Section 5.7, *Historical and Tribal Cultural Resources*, no archaeological resources have been recorded within the project site; however, the potential for subsurface resources exists.

Present and reasonably foreseeable future projects within the Mission Valley and Serra Mesa areas could result in impacts on important archaeological artifacts during construction activities that disturb soils where the potential exists to encounter isolated archaeological deposits or other items of historic value. Therefore, cumulative development in the project area could result in the loss and/or degradation of cultural resources. However, the City of San Diego's CEQA Significance Criteria call for extensive archaeological monitoring, based on the location of sensitive cultural resources. Therefore, because all cumulative projects in the city would implement detailed mitigation to avoid the destruction of any sensitive archaeological resources, cumulative impacts on cultural resources from the projects listed in Table 6-1 would be less than significant.

6.3.6.3 Project Contribution

Archaeological and historical investigations did not identify any archaeological or historical resources within the project site. Nevertheless, the potential exists for project construction activities to result in impacts on subsurface historical and Tribal Cultural Resources. However, mitigation required at the project level (**MM-HIST-1**) would ensure that the project's potential impact on historical and Tribal Cultural Resources would be less than significant. When combined with the cumulative projects listed in Table 6-1, which would also implement mitigation in areas of sensitivity, pursuant to the City's CEQA Significance Criteria, cumulative impacts would be less than significant, and the project's contribution to the cumulative impact would not be considerable.

6.3.6.4 Level of Significance Prior to Mitigation

Mitigation (**MM-HIST-1**) is required for project-specific impacts, as discussed in Section 5.7, *Historical and Tribal Cultural Resources*. With this mitigation, impacts on historical and Tribal

Cultural Resources would be avoided. Therefore, the proposed project would not result in a cumulatively considerable contribution to cumulative cultural resources impacts.

6.3.6.5 Mitigation Measures

No mitigation is required at the cumulative level. However, the proposed project would implement mitigation measure **MM-HIST-1** to reduce project-specific impacts to a less-than-significant level.

6.3.6.6 Level of Significance After Mitigation

Mitigation measure **MM-HIST-1** is required for project-related impacts. However, once implemented, it would also help the proposed project avoid any cumulatively considerable contribution to such impacts by reducing the potential for damaging unknown archaeological resources that may be present. In addition, should an unexpected discovery of human remains be made, California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 would apply. Therefore, cumulative impacts would be reduced to less than cumulatively significant.

6.3.7 Hydrology and Water Quality

A significant cumulative impact on hydrology and water quality would result if the proposed project were to contribute to impacts related to water quality standard violations, increased runoff that would be in excess of available capacity, and alterations to drainage patterns that would lead to erosion or flooding, as evaluated within the context of past, present, and reasonably foreseeable future projects.

6.3.7.1 Geographic Scope

The geographic scope of analysis for cumulative impacts on hydrology and water quality includes the San Diego River watershed, which includes all of the projects listed in Table 6-1.

6.3.7.2 Cumulative Effects

Past projects within the San Diego River watershed have contributed pollutants to the Lower San Diego River, as evidenced by the Clean Water Act Section 303(d) List of Water Quality Limited Segments Requiring Total Maximum Daily Loads. Current and future projects would be subject to the state and local regulatory standards that must be achieved during construction and operation to reduce or avoid polluted runoff to the maximum extent practicable. These current and reasonably foreseeable future projects could contribute pollutants such as oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens to the stormwater conveyance system and receiving waters. The majority of the projects listed in Table 6-1 would involve at least 1 acre of grading, except for the recently constructed Mission Valley Fire Station. These projects would be required to comply with the National Pollutant Discharge Elimination System Construction General Permit, which requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer and implementation of best management practices (BMPs) by a Qualified SWPPP Practitioner to ensure that runoff from individual projects would meet current water quality standards.

Present and reasonably foreseeable future projects would be subject to regulations that require compliance with water quality standards, including state and local water quality regulations, such as

the City of San Diego's Stormwater Management and Discharge Control Ordinance, which identifies water quality BMP requirements (for projects within the City's jurisdiction). The City's Stormwater Management and Discharge Control Ordinance requires implementation of measures to reduce the risk of non-stormwater discharges and pollutant discharges through the use of BMPs. However, because the Lower San Diego River is currently an impaired water body and has been for some time, the cumulative effect of past, present, and reasonably foreseeable future projects may result in a cumulatively significant water quality impact.

6.3.7.3 Project Contribution

A cumulatively significant impact on hydrology and water quality presently exists because of the Lower San Diego River's status as an impaired water body and the potential for present and future projects to further degrade the water body. The proposed project would involve land-disturbing activities that would expose soils and, as such, would require compliance with the Construction General Permit. Compliance with the Construction General Permit would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would list the BMPs that would be implemented by the Qualified SWPPP Practitioner to protect stormwater runoff and include a monitoring plan for measuring BMP effectiveness. At a minimum, BMPs would include practices to minimize contact between construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. The SWPPP would specify properly designed, centralized storage areas to keep these materials out of the rain. If grading must be conducted during the rainy season, the primary BMPs selected would focus on erosion control (i.e., keeping sediment in place), followed by sediment control (i.e., keeping sediment on the site). In addition to the SWPPP, implementation of construction BMPs would be required, which would reduce impacts on water quality.

The proposed project would result in an increase in impervious surface areas and may increase the volume of runoff. Operational activities would involve vehicle traffic on the roadway, which could generate pollutants (trash, debris/litter), metals, nutrients, oil and grease, organics, and sediment. The project would be required to comply with the municipal separate storm sewer system permit, the City's stormwater standards, and the *BMP Design Manual* (County of San Diego 2016) to reduce the volume of runoff, treat pollutants, and generally maintain existing hydrologic conditions. The City's stormwater standards would mandate inclusion of Low-Impact Development and runoff management, which would reduce the amount of impervious surfaces and runoff volumes compared with current conditions. Therefore, the project's incremental contribution to significant cumulative water quality impacts from past, present, and reasonably foreseeable future projects would be less than cumulatively considerable.

6.3.7.4 Level of Significance Prior to Mitigation

The proposed project's incremental contribution to cumulative impacts related to hydrology and water quality would not be cumulatively considerable.

6.3.7.5 Mitigation Measures

No mitigation is required.

6.3.8 Visual Effects and Neighborhood Character

A cumulatively considerable impact on aesthetics and visual quality would result if the proposed project were to contribute to a significant cumulative impact related to a substantial and adverse change in the overall character of the area or cumulative blockage of a view that would affect the overall scenic quality of a resource, develop structures that would substantially differ from the character of the vicinity, or result in the addition of a substantial cumulative amount of light and/or glare.

6.3.8.1 Geographic Scope

The geographic scope of analysis for cumulative aesthetics and visual quality impacts to which the proposed project may contribute is within the immediate vicinity of the project site and the Quarry Falls site. The topography of this area includes a valley that is surrounded by major roadways (I-805 to the east, Friars Road and I-8 to the south); this confines the cumulative viewshed to this area. As described in Section 5.9, the project site currently comprises approximately 2 acres of undeveloped land adjacent to the 230-acre Quarry Falls site. The northern portion of the project site slopes upward on a hillside to the point where it abuts Phyllis Place. The middle of the southern portion of the project site dips slightly in the center and then gently slopes upward to both the eastern and western edges of the project site. The northern portion of the project site (where the proposed road would intersect with Phyllis Place) is visually characterized by a hillside covered with sparse vegetation; the adjacent off-site land is also characterized visually as sparsely vegetated. The southern portion of the project site contains graded land; land immediately adjacent and off site is characterized by expansive parcels of graded land. Overall, even though the site is primarily disturbed, the visual quality of the site is moderate because of the presence of the hillside.

6.3.8.2 Cumulative Effects

Past projects within the cumulative viewshed included the former mining operation on the Quarry Falls site, roadways, and energy transmission towers operated by San Diego Gas & Electric. These projects changed the condition of the cumulative study area from one that is undisturbed to primarily disturbed, although the hillside south of Phyllis Place remains somewhat undisturbed. Present projects include the development associated with Quarry Falls, which is transforming the site from that of a mining operation to a mixed-use development composed of residences, commercial/retail uses, roadways, and open space areas. The Quarry Falls PEIR concluded that the Quarry Falls project would result in a significant change to the visual character of the site and surrounding area, changing the existing site from a mining site to urban development, similar to what occurs in adjacent areas surrounding the site. No mitigation measures were identified to reduce the significant change in the visual character of the site and surrounding area to below a level of significance. Therefore, the cumulative visual effect of past, present, and reasonably foreseeable future projects is cumulatively significant.

6.3.8.3 Project Contribution

The proposed project does not include vertical structures (other than light poles) that would be added to the viewshed. The project site is on a hillside that is visible from the Quarry Falls development and Phyllis Place. However, within the context of the substantial development occurring at the Quarry Falls site and other existing development in the vicinity of the project site, the inclusion of a relatively small segment of roadway would be minimally discernible from the

surrounding area. In addition, the project would be developed using the standards for a four-lane urban major street established by the City of San Diego in the *Street Design Manual* (2002). Following these standards would ensure that all necessary components of the roadway, such as roadway and lane widths, curb cuts, sidewalks, and bicycle lanes, would be incorporated and that the proposed roadway would be designed in a uniform manner. Landscaping that conforms to the City's landscape regulations would also be included in the project design to enhance the character of the street design. However, as previously detailed under Issue 5 in Section 5.9, *Visual Effects and Neighborhood Character*, the project site is on a steep hillside with natural gradients equal to or in excess of 25%; therefore, it would be subject to the City's Environmentally Sensitive Lands Regulations.

The project would alter more than 2,000 cubic yards of earth per graded acre and/or result in a change in elevation for a steep hillside, from existing grade to a proposed grade of more than 5 feet. As such, the proposed project would have the potential to result in an incremental contribution to significant cumulative landform alteration impacts.

6.3.8.4 Level of Significance Prior to Mitigation

Mitigation detailed in Section 5.9, including mitigation measure **MM-VIS-1**, would apply to cumulative impacts associated with landform alteration.

6.3.8.5 Mitigation Measures

Implementation of mitigation measure **MM-VIS-1** would reduce this project's impacts to less-than-significant levels.

6.3.8.6 Level of Significance After Mitigation

With implementation of mitigation, the proposed project's incremental contribution to cumulative impacts related to visual quality would be incremental and would not be cumulatively considerable and, therefore, would be less than cumulatively significant.

6.3.9 Greenhouse Gas Emissions

The potential exists for a cumulatively considerable GHG emissions-related impact if the project is inconsistent with the City's Climate Action Plan (CAP), which is a qualified GHG Reduction Plan.

6.3.9.1 Geographic Scope

Climate change is a cumulative issue; therefore, the geographic scope for cumulative GHG emissions impacts is global. Because climate change is the result of cumulative global emissions, no single project, when considered in isolation, can cause climate change—a single project's emissions are not large enough to change the radiative balance of the atmosphere. Because climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, cumulative GHG emissions that contribute to global climate change would have a significant cumulative impact on the natural environment as well as human development and activity. The global increase in GHG emissions that has occurred and will occur in the future is the result of the actions and choices of individuals, businesses, local governments, states, and nations. Furthermore, although climate change impacts will most likely vary by geography and intensity, the impacts that result from cumulative global emissions will be felt worldwide. The GHG emissions and climate change analysis

within Section 5.10, *Greenhouse Gases*, is inherently a cumulative analysis. However, a summary of the discussion is provided below.

6.3.9.2 Cumulative Effects

Past, present, and reasonably foreseeable future projects throughout the region, state, nation, and world will continue to contribute to the cumulative impacts of global climate change. However, development projects within the City of San Diego are required to demonstrate consistency with the City's CAP. In December 2015, the City adopted its CAP, which identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business-as-usual projection for emissions at 2020 and 2035, State targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.

With the July 2016 adoption of an amendment to the CAP to include the CAP Consistency Checklist, the CAP meets all the requirements of State CEQA Guidelines Section 15183.5(b)(1)(A – F) to be a Qualified GHG Reduction Plan. In meeting these requirements, the City of San Diego has analyzed and mitigated the significant effects of GHG emissions for the entire City at the programmatic level. Pursuant to State CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted Qualified GHG Reduction Plan. The CAP Final EIR concluded that implementation of the CAP, which includes an annual monitoring program, would result in less-than-significant overall citywide GHG emissions, and this analysis tiers from that analysis in the CAP certified Final EIR. Therefore, future projects that are determined to be consistent with the CAP would not incrementally contribute to a cumulative GHG effect.

6.3.9.3 Project Contribution

As previously detailed in Section 5.10.4, implementation of the proposed project would reduce VMT and associated emissions by providing a direct linkage that is consistent with the mobility goals of the City's General Plan, relevant community plans, and the VMT and emissions reduction targets within the CAP. By reducing GHG emissions relative to baseline conditions and by improving local transportation efficiency by providing a new bicycle and pedestrian connection consistent with the CAP's overarching land use and transportation strategy, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. Therefore, the project's incremental contribution to significant cumulative GHG emissions impacts from past, present, and reasonably foreseeable future projects would be less than cumulatively considerable.

6.3.9.4 Level of Significance Prior to Mitigation

The proposed project's incremental contribution to cumulative impacts related to GHG emissions would not be cumulatively considerable.

6.3.9.5 Mitigation Measures

No mitigation is required.

6.3.9.6 Level of Significance After Mitigation

The proposed project's incremental contribution to cumulative impacts related to GHG emissions would not be cumulatively considerable and therefore would be less than significant.

Chapter 7

Effects Not Found To Be Significant

Section 15128 of the State CEQA Guidelines requires that an EIR briefly describe potential environmental effects that were determined not to be significant and therefore were not discussed in detail in the EIR. The environmental issues discussed in the following sections are not considered significant, and the reasons for the conclusion of non-significance are discussed below. The determination is based on the City of San Diego's CEQA Significance Determination Thresholds (2016) and Appendix G of the State CEQA Guidelines.

7.1 Agricultural and Forestry Resources

According to the City's Significance Determination Thresholds and Appendix G of the State CEQA Guidelines, the following issues provide guidance to determine potential significance of impacts on agricultural resources.

Issue 1: Would the proposed project result in conversion of a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Issue 2: Would the proposed project conflict with existing zoning for agricultural use, or Williamson Act contract?

There are several classifications of farmland, including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland. According to the City of San Diego's General Plan EIR, there are about 15,900 acres of land designated for agricultural uses. Areas of continuing significant agricultural production in the City are located in the San Pasqual Valley, Otay Mesa, and the Tijuana River Valley.

The project site is in an urbanized area where there is no farmland or agricultural resources. According to the Farmland Mapping and Monitoring Program of the California Department of Conservation (2015), the project site is classified as Urban and Built-Up Land and does not contain any Prime Farmland or Farmland of Statewide Importance. The site is not zoned for agricultural use, nor is there a Williamson Act contract for the site (California Department of Conservation 2013). Implementation of the proposed project on the project site would not involve changes to the existing environment that, because of the location or nature, could result in the conversion of Farmland to non-agricultural use. No impact related to agricultural resources would occur.

- Issue 3: Would the proposed project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**
- Issue 4: Would the proposed project result in the loss of forest land or conversion of forest land to non-forest use?**
- Issue 5: Would the proposed project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

The project site is within an almost entirely urbanized area. No land zoned or designated as forest land or timberland exists within the project site or the City of San Diego. Therefore, the proposed project would not conflict with existing zoning for forest land or timberland, nor would it result in the loss of forest land or conversion of forest land to other uses. Overall, implementation of the proposed project would not involve any changes in the existing environment that would result in the conversion of farmland or forest land and it would have no impact on agriculture or forest resources.

7.2 Energy Use

The State CEQA Guidelines recommend an EIR consider the potentially significant energy implications of a project, if relevant. Appendix F to the State CEQA Guidelines identifies the following potential environmental impacts related to energy that may be included in an EIR.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak- and base-period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

The State CEQA Guidelines recommend that the discussion of applicable energy impacts focus on whether the project would result in the wasteful, inefficient, or unnecessary consumption of energy (Public Resources Code Section 21100(b)(3)). Accordingly, based on the criteria outlined in Appendix F of the State CEQA Guidelines, the proposed project would cause significant impacts related to energy if it would lead to a wasteful, inefficient, and unnecessary usage of direct or indirect energy. For the purposes of this analysis, "wasteful" and "inefficient" are defined as circumstances in which the project would conflict with applicable State or local energy standards. State and local energy legislation focuses on reducing energy consumption and improving energy

efficiency. Accordingly, if the project conflicts with State or local energy policies, which were designed to avoid wasteful and inefficient energy usage through improved energy efficiency and reduced energy consumption, it would result in a significant impact related to energy resources.

Because energy legislation adopted by California and local governments is intended to conserve statewide and regional energy consumption, projects that conflict with applicable plans and policies would also contribute to a cumulative energy impact. Accordingly, for the purposes of this analysis, the project would result in a significant cumulative impact if it conflicts with applicable State or local energy standards, and, as such, the project-level and cumulative impact determinations are identical.

The energy analysis for the project evaluates both direct and indirect energy, as defined below.

Direct energy is the energy used in the actual propulsion of motor vehicles using transportation facilities. Direct energy associated with the project consists of energy consumed by all vehicles entering and passing through the transportation study area. The project would affect the energy consumed, relative to existing conditions, by changing vehicle speeds and patterns.

Indirect energy is the energy used for construction, maintenance, and operation of the project, and any substantial energy expenditures related to project-induced land use changes and mode shifts. Indirect energy associated with the project consists of energy consumed during construction, electricity used to power pedestrian lighting fixtures, and energy consumed by routine operations and maintenance activities.

Issue 1: Would the proposed project lead to a wasteful, inefficient, and unnecessary usage of direct energy?

Direct energy consumption would result from motor vehicles using transportation facilities and would be affected by the project's effect on vehicle speeds and travel patterns in the immediate vicinity. Table 7-1 shows the estimated energy consumption directly related to motor vehicle travel.

Table 7-1. Estimated Annual Operational Energy Consumption^a

Phase	Gasoline		Diesel	
	Gallons of Fuel	Million BTU	Gallons of Fuel	Million BTU
2013 Existing	98,554	11,228	5,435	704
2017 No Project	95,246	10,851	5,209	675
2017 Project	94,574	10,775	5,173	670
2035 No Project	75,772	8,632	5,139	665
2035 Project	75,205	8,568	5,100	660

Sources: ARB 2014; Climate Registry 2015; Oak Ridge National Laboratory 2014
^a million British thermal units (BTUs) per year

Implementation of the project would redistribute vehicle trips by diverting traffic to the new road connection, resulting in an increase in local vehicle miles traveled (VMT) (within the project area) and a corresponding reduction in regional VMT on surrounding arterials and freeways. As shown in Table 7-1, this reduction in regional VMT would reduce fuel and energy consumption during both the opening year (2017) and buildout year (2035) conditions compared to both existing (2013) and no project conditions. Moreover, as shown in Table 7-1, fuel consumption trends downward over

time, as fuel economy-related regulations come online, including regulations that improve both passenger vehicle and medium- and heavy-duty truck fuel economy. These regulations, which reduce greenhouse gas emissions by improving fuel economy, are described in detail within Section 5.10, *Greenhouse Gases*. The project would therefore not result in a wasteful, inefficient, and unnecessary usage of direct energy, and impacts would be less than significant.

Issue 2: Would the proposed project lead to a wasteful, inefficient, and unnecessary usage of indirect energy?

Indirect energy consumption would result from project construction, operation, and maintenance of the roadway. Construction of the project would result in the consumption of energy (e.g., fossil fuels) to manufacture and deliver materials to construct the roadway. Operation and maintenance of the project would result in the consumption of energy to power new pedestrian-scale lighting fixtures and maintain the roadway. Maintenance activities required for the 460-foot-long roadway are not expected to be significant as they would be infrequent, primarily related to the maintenance of landscaping within the median.

Construction and demolition activities are anticipated to occur over a 9-month period. Manufacturing and transport of pavement, striping, curbs, landscaping, and other construction materials would require a one-time expenditure of energy. Likewise, energy would be consumed by heavy-duty equipment used to grade, pave, and construct the roadway; trucks to haul and move around debris and materials; and passenger vehicles to bring workers to and from the project site. Energy use associated with project construction is estimated to result in the short-term consumption of 8,844 million BTUs. This represents a small demand on local and regional fuel supplies that would be easily accommodated. Moreover, this demand for fuel would have no noticeable effect on peak or baseline demands for energy. Therefore, construction of the project would not result in a wasteful, inefficient, and unnecessary usage of indirect energy. Once constructed, new pedestrian-scale lighting fixtures would represent a long-term source of electricity consumption.

While construction would result in a short-term increase in energy use, construction design features would help conserve energy. For example, as described in Chapter 3, *Project Description*, the fill soil for the roadway is expected to be transported from the Quarry Falls site, which would significantly reduce the amount of off-site haul trips. The new pedestrian-scale lighting fixtures would also be designed to provide low-level lighting and minimize energy consumption. Specifically, the project would install high efficiency light emitting diode (LED) bulbs as feasible to achieve a natural appearance (color temperature = 4,000–4,200 degrees Kelvin), which consume about 75% less electricity than typical incandescent bulbs (U.S. Department of Energy 2014). These energy conservation features are consistent with State and local policies to reduce energy.

Therefore, the project would not result in an inefficient, wasteful, and unnecessary consumption of indirect energy, and impacts would be less than significant.

7.3 Geologic Conditions

Information in the following discussion is based on the geologic reconnaissance report that was prepared by GEOCON Inc. (GEOCON) in June 2013 for the project, included as Appendix G to this DEIR. This section is also based on information from the Preliminary Geotechnical Investigation

Report and the Addendum and Revised Addendum reports prepared for the Quarry Falls project in April 2005, October 2005, and February 2006.

Pursuant to the recent Supreme Court case decision in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369, Case No. S213478, CEQA does not require an analysis of how the existing environmental conditions will affect a project's residents or users unless the project would exacerbate those conditions. Therefore, when discussing impacts of the environment on the project, such as how a fault rupture or soil condition may affect a project, the analysis will first determine if there is a potential for the project to exacerbate the issue. If evidence indicates it would not, then the analysis will conclude by stating such. If it would potentially exacerbate the issue, then evidence is provided to determine if the exacerbation would or would not be significant.

According to the City's CEQA Significance Determination Thresholds, the following issues provide guidance to determine potential significance of impacts on geological conditions.

Issue 1: Would the proposed project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

The City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Map Sheet 21 classifies the project site as Hazard Category 53: level or sloping terrain, unfavorable geologic structure, low to moderate risk (Figure 7-1). A review of geologic literature and experience with the soil and geologic conditions in the general area indicates that known active, potentially active, or inactive faults are not located at the site. The site is not within a State of California Earthquake Fault Zone.

Six known active faults are within a 50-mile radius of the project site. The nearest known active fault is the Newport-Inglewood/Rose Canyon fault system, 3 miles to the west, which would be the dominant source of ground motion in the event of an earthquake. Earthquakes that might occur from this fault system or other faults within the region are potential generators of significant ground motion at the site. The project site could be subjected to moderate to severe ground shaking in the event of an earthquake along any of the faults in the region.

Concerning landslide potential, based on a review of aerial photographs and published geologic maps, and the relatively level topography, the geological reconnaissance report stated that landslides are not present at the project site or at a location that could affect the site.

The project consists of the construction and operation of a roadway connection; therefore, there would be no buildings or structures that would accommodate human occupancy and in turn expose structures to geologic hazards. There is the potential for vehicles, pedestrians, or cyclists to be utilizing the roadway in the event of an earthquake; however, the project site is not located on an active fault.

While the project site may experience strong seismic ground shaking, the proposed project would not exacerbate the potential for strong seismic ground shaking to occur or cause the ground shaking to be more powerful. Influencing seismic ground shaking would require deep and significant intrusion, such as from the creation of reservoirs and the pumping of fluids in deep wells, to increase the potential for a rupture to occur (Southern California Earthquake Center n.d.). The occurrence of earthquakes in the region is common and strong ground shaking is likely to occur at some point, but the proposed project would have no potential to exacerbate the potential for earthquakes. Therefore, the proposed project could not cause ground failure or an earthquake.

Additionally, incorporation of the general recommendations, soil and excavation recommendations, preliminary grading recommendations, site drainage and moisture protection recommendations, preliminary pavement recommendations, grading plan review, and future geotechnical investigation recommendations as stated in the geologic reconnaissance would ensure the roadway meets applicable standards. Therefore, impacts on geologic hazards would be less than significant.

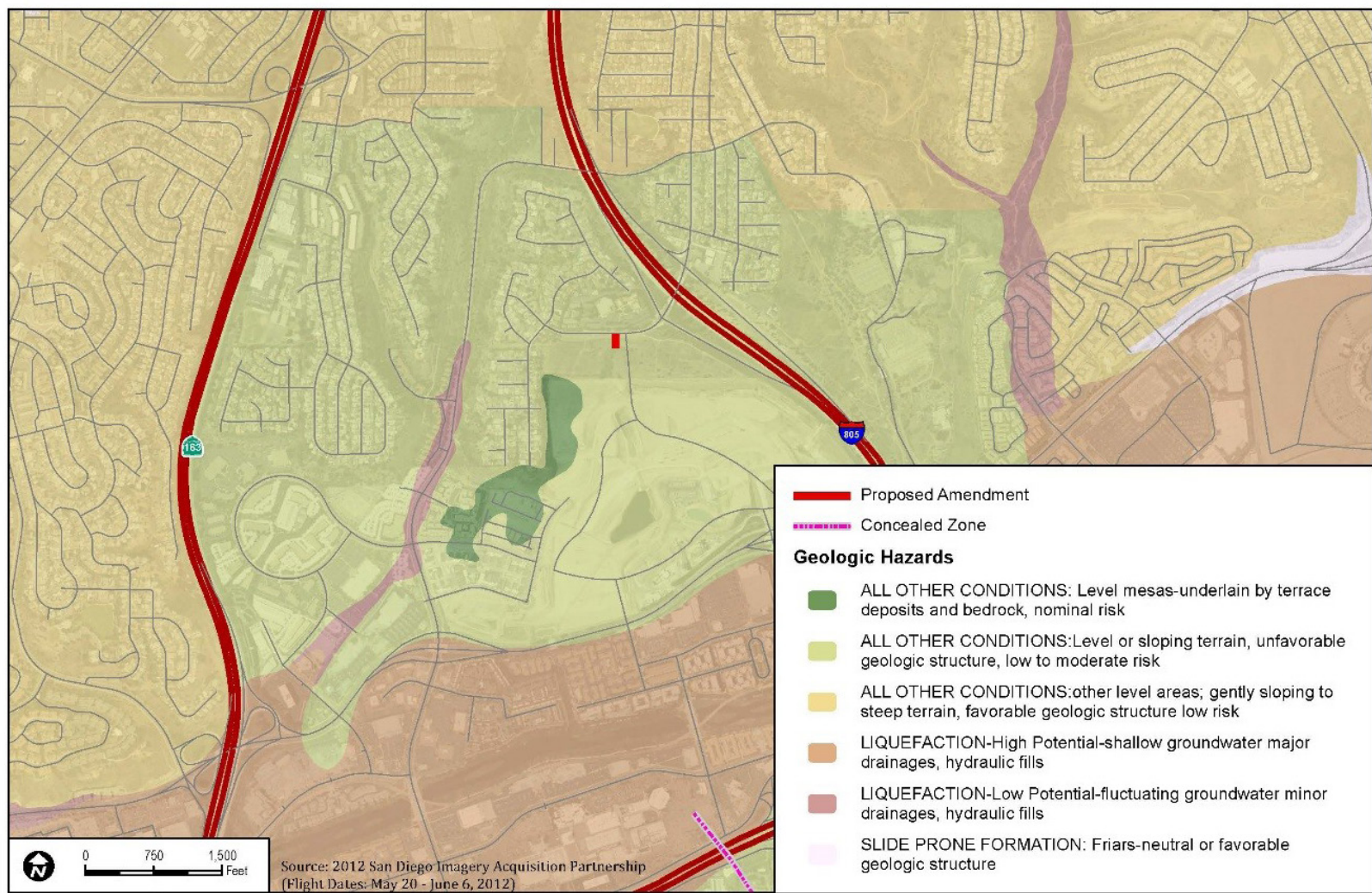
Issue 2: Would the proposed project result in a substantial increase in wind or water erosion of soils, either on or off the site?

Five surficial soil types and one geologic formation underlie the project site. The surficial deposits consist of compacted fill, undocumented fill, topsoil, alluvium, and Terrace Deposits underlain by the Stadium Conglomerate. On-site soils consist of both expansive and non-expansive soils. On-site topsoil maintains a “very high” expansion potential as identified in the site-specific geologic reconnaissance. Construction activities would expose and disturb soils and could therefore increase the potential for soil erosion on site. However, adherence to the erosion control standards during construction established by the City’s *Land Development Manual* and other regulations would be required. In compliance with the National Pollution Discharge Elimination System, the applicant would prepare a stormwater pollution prevention plan that specifies best management practices to be implemented during project construction to prevent pollutants from contacting stormwater and control erosion and sedimentation. The stormwater pollution prevention plan would be prepared and submitted to the Regional Water Quality Control Board for review and approval prior to the start of construction.

Additionally, incorporation of the site-specific geotechnical recommendations as stated in the geologic reconnaissance conducted by GEOCON (2013), as well as adherence to appropriate engineering design and construction measures to meet California Building Code standards, would ensure that impacts from wind or soil erosion would remain less than significant.

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 an on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project would not be located on natural materials that are unstable or that would become unstable as a result of the project. The potential for liquefaction in the project area is considered low due to the presence of shallow, dense formational materials and the lack of permanent, near-surface groundwater (GEOCON 2013). According to the geological reconnaissance, the risk of on- or off-site landslide, lateral spreading, subsidence, or collapse is low. With incorporation of the site-specific geotechnical recommendations as stated in the geologic reconnaissance conducted by GEOCON (2013), as well as adherence to standards in the City’s *Land Development Manual*, and the appropriate engineering design and construction measures to meet applicable standards, impacts from unstable soils would be less than significant.



Source: City of San Diego, 2016.

Figure 7-1
Geologic Hazards and Faults

7.4 Health and Safety

According to the City's CEQA Significance Determination Thresholds, the following issues provide guidance to determine potential significance of impacts on health and safety.

- Issue 1:** 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 2:** Would the proposed project be located on a site 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 3:** 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 project site is partially within the Quarry Falls site, which was historically used for mining operations that required the storage and usage of hazardous materials including gasoline, diesel fuel, concrete additives, iron oxides, antifreeze, capping compounds, fly ash, lubricating oils, compressed gases, calcium chloride, calcium nitrite, potassium hydroxide, cleansers, and pond flocculants (see Section 5.7 of the Quarry Falls Program EIR). The Quarry Falls site has also historically contained multiple underground storage tanks (USTs) for the purposes of fuel and hot asphalt storage. These USTs were removed as mining operations on the Quarry Falls site phased out.

A review of two databases containing existing hazardous material sites was conducted: Envirostor (California Department of Toxic Substances Control 2016) and Geotracker (State Water Resources Control Board 2016). Two cleanup programs were completed and approved prior to construction of the Quarry Falls residential units located just north of Friars Road. Two other leaking UST cases in the vicinity of Friars Road were also completed and are listed as closed. All four of these records are more than 0.5 mile south of the project site.

The project site itself is vacant and has not historically contained uses that would store or use hazardous materials. The project site is also not known to contain any USTs or belowground hazardous materials. As such, the project site would not be located on an existing hazardous material site, and impacts would be less than significant.

The project site is approximately 0.25 mile southwest of the Faith Community School. This school is on the opposite side of Interstate (I-) 805 along Murray Ridge Road. The proposed roadway connection itself would not represent a stationary source of hazardous materials storage. However, there is the potential that trucks transporting hazardous materials may use the roadway connection. Vehicles that transport hazardous materials are subject to numerous regulations, including those set forth by the U.S. Department of Transportation, California Department of Transportation, U.S. Environmental Protection Agency, California Department of Toxic Substances Control, California Highway Patrol, and California State Fire Marshall. Furthermore, the roadway would not be a roadway of regional significance (such as I-805), where trucks are more likely to be traveling with hazardous substances. Therefore, impacts from hazardous emissions or hazardous or acutely hazardous materials, substances, or waste within a quarter mile of an existing or proposed school would be less than significant.

The project would allow for an approximately 1-acre right-of-way that would include a roadway and sidewalks. The remainder of the area would contain native landscaping that would not utilize pesticides or herbicides. Historically the area has been undeveloped land, and the project does not propose to use the land for agricultural purposes that could expose people to toxic substances, such as pesticides and herbicides. Therefore, impacts associated with exposure of people to toxic substances, such as pesticides and herbicides, would be less than significant.

Issue 4: Would the proposed project result in a safety hazard for people residing or working in a designated airport influence area?

Issue 5: Would the proposed project result in a safety hazard for people residing or working within 2 miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan?

The project site is not within 2 miles of a private airstrip, but it is approximately 1.8 miles south of the Montgomery Field Airport. The Montgomery Field Airport Land Use Compatibility Plan (ALUCP) (San Diego County Airport Land Use Commission 2010) addresses four types of airport land use compatibility factors, including safety. The safety zone boundaries are based on general aircraft accident location data, runway configuration, and aircraft operational procedures. As shown on Figure 7-2, the project site is outside all safety zone boundaries established in the Montgomery Field ALUCP. Additionally, the project would allow for a roadway connection and would not include any vertical structures that could potentially interfere with aircraft safety. As such, the project would not result in an airport-related safety hazard for people residing or working in a designated airport influence area or within 2 miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted ALUCP, and impacts would be less than significant.

Issue 6: Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would amend the Serra Mesa Community Plan to include a street connection with supported bicycle and pedestrian facilities. This would provide an additional ingress and egress roadway for the surrounding area, and provide additional emergency access for emergency responders to the area. As a result, the proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan, and would increase emergency access opportunities in the vicinity; no impact would occur.

Issue 7: Would the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

As shown on Figure 7-3, the project site is not within a Very High Fire Hazard Severity Zone. The area directly to the north of the project is currently developed, and the land adjacent to the east, west, and south of the project area is currently being developed and would be maintained as part of the Quarry Falls project. Therefore, the project site is not in a developed urban area that is surrounded by physical development and would not result in the construction of buildings or residences that would be occupied by people. As such, impacts related to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires would be less than significant.



Source: City of San Diego, 2016.

Figure 7-2
Montgomery Field Safety Compatibility Map



Source: City of San Diego, 2016.

Figure 7-3
Very High Fire Hazard Severity Zone

7.5 Mineral Resources

According to the City's CEQA Significance Determination Thresholds, the following issues provide guidance to determine potential significance of impacts on mineral resources.

Issue 1: Would the proposed project result in a loss of availability of significant mineral resources (e.g., sand or gravel) as identified the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey (located in the EAS library)?

The southern portion of the project site is within the Quarry Falls site, which is a former mining site that has since been reclaimed and is now a mixed-use development that currently contains residential uses and will also contain commercial uses. According to the California Department of Conservation, Division of Mines and Geology, the project site is within Mineral Resource Zone 2 (MRZ-2), which includes areas containing mineral deposits, or where there is a high likelihood of mineral deposits. As previously detailed, the southern portion of the project site has been previously mined for resources, while the northern portion consists of a primarily undeveloped hillside. As a portion of the project site (and the entire Quarry Falls site) no longer contains mineral resources, no impact would occur.

7.6 Population and Housing

As the City's CEQA Significance Determination Thresholds do not establish significance thresholds for population and housing, the following issues from Appendix G of the State CEQA Guidelines provide guidance to determine potential significance of impacts on population and housing.

Issue 1: Would the proposed project induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

The proposed project consists of the construction and operation of a roadway and does not propose any use (i.e., new homes or businesses) that would induce substantial population growth in the area. Therefore, no direct impact on population growth would occur.

Related to potential indirect impacts, the proposed project includes a roadway connection that is referenced in the Mission Valley Community Plan and other applicable City planning documents such as the Bicycle Master Plan and Climate Action Plan. The proposed roadway connection is not included in the Serra Mesa Community Plan; however, the proposed project includes a Community Plan Amendment to the Serra Mesa Community Plan to include the proposed roadway connection. The proposed project would extend roadway infrastructure by connecting existing built-out neighborhoods to the north with approved and currently developing areas in the Quarry Falls project to the west, south, and east. The proposed project would accommodate the planned growth in the surrounding communities by providing a connection for vehicles, bicycles, and pedestrians between the Mission Valley and Serra Mesa communities and also providing regional access to I-805. It is not anticipated that this project would result in the development of additional growth-inducing projects as there is not much vacant, developable land within the project vicinity, and the Serra Mesa Community Plan designates most of the surrounding area as low density. Furthermore,

the proposed project would not provide roadway access to an area that was wholly inaccessible (e.g., a roadway to a rural area from a highway). As previously detailed, the proposed project intends to connect existing urban communities and provide additional options within the transportation network. Impacts would therefore be less than significant.

Issue 2: Would the proposed project displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?

Issue 3: Would the proposed project displace a substantial number of people, necessitating the construction of replacement housing elsewhere?

The project site is vacant and does not include any existing housing units. Therefore, the proposed project would not displace any existing housing or people. No impact would occur.

7.7 Public Services and Facilities

According to the City's CEQA Significance Determination Thresholds, the following issue provides guidance to determine potential significance of impacts on public services and facilities.

Issue 1: Would the proposed project have an effect upon, or result in a need for new or modified government services in, any of the following areas: fire/life safety protection; police protection; schools; maintenance of public facilities, including roads, parks, or other recreational facilities; and libraries?

7.7.1 Fire–Rescue Services

The project site would be served by the San Diego Fire-Rescue Department Fire Station 45, which is located at 9366 Friars Road, approximately 1.3 miles east of the project site (Trame pers. comm.). Fire Station 45 serves an approximately 4.28-square-mile area in West Mission Valley and its surrounding areas (City of San Diego 2016a). Fire Station 45 opened in November 2015 and contains four battalion chief vehicles, Fire Engine 45, and two HAZMAT response units. In fiscal year 2016, Fire Station 45 responded to more than 3,080 incidents, including fire, rescue, emergency medical, non-emergency medical, and hazards.

Fire Station 28 at 3880 Kearny Villa Road, approximately 1.9 miles north of the project site, opened in 1958 and serves 7.76 square miles within Kearny Mesa/Montgomery Field and its surrounding areas and could also serve the project site (City of San Diego 2016b). The station contains a fire engine, truck, water tender, foam apparatus, and crash apparatus. In fiscal year 2016, Fire Station 28 responded to more than 3,581 incidents, including fire, rescue, emergency medical, urgent medical, non-emergency medical, and hazards.

The proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for fire-rescue services. Also, as discussed in Section 5.2, *Transportation and Circulation*, construction of the proposed road connection would increase circulation efficiency in the immediate project vicinity, and would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. As confirmed with the San Diego Fire-Rescue Department, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Trame pers. comm.). Therefore, the San Diego Fire-Rescue Department generally

supports the proposed project (Trame pers. comm.). Overall, the proposed project would be adequately served by the existing area fire-rescue department facilities, would not generate the need for a new or expanded fire station in the project site, and would generally improve emergency access and thus response times. No impact would occur.

7.7.2 Police Services

Information within this section is based on correspondence with the San Diego Police Department (SDPD) (City of San Diego 2016c) and additional correspondence with the Eastern Division (Brown pers. comm.). The project site would be served by officers from the Eastern Division, which services numerous eastern communities including Serra Mesa, Qualcomm, and Mission Valley East. SDPD has mutual aid agreements with all other law enforcement agencies in San Diego County.

Eastern Division is currently staffed with 84 sworn personnel and one civilian employee. Officers work 10-hour shifts. Staffing comprises three shifts that operate from 6:00 a.m.–4:00 p.m. (First Watch), 2:00 p.m.–midnight (Second Watch), and 9:00 p.m.–7:00 a.m. (Third Watch). Using SDPD's recommended staffing guidelines, Eastern Division currently deploys a minimum of nine patrol officers on First Watch, 11 patrol officers on Second Watch, and eight patrol officers on Third Watch. SDPD does not staff individual stations based on ratios of sworn officers per 1,000-population ratio. The goal citywide is to maintain 1.48 officers per 1,000-population ratio. SDPD is currently staffing a ratio of 1.36 sworn officers per 1,000 residents based on the 2015 estimated residential population of 1,311,882. This ratio does not include the significant population increase resulting from citizens who commute to work from outside of the City of San Diego or those visiting.

The proposed project does not include a residential housing component; therefore, no increase in residential population would occur that may increase call volumes for police services. According to coordination with SDPD's Eastern Division (Brown pers. comm.), access within the vicinity of the project site is slightly limited for police responders. As confirmed with SDPD, additional access points (such as the proposed roadway connection) generally improve emergency access and associated response times (Brown pers. comm.). The additional access route would improve emergency access in the area, potentially reducing emergency response times associated with police responders. Therefore, the proposed project would be adequately served by the existing area police facilities and would not generate the need for a new or expanded police station in the project area. No impact would occur.

7.7.3 Schools

The proposed project does not include a growth-inducing component (i.e., housing) and therefore would not generate an increase in resident population requiring educational facilities and services. There are no schools within the immediate vicinity of the project site. The project site is approximately 0.25 mile southwest of the Faith Community School, which is on the opposite side of I-805 along Murray Ridge Road. The San Diego Unified School District is also considering a school within the Quarry Falls development, which would be located approximately 0.35 mile south of the project site. As the project consists of a roadway connection to allow better access between two existing communities, it would not have an effect on existing schools. Therefore, no impact would occur.

7.7.4 Libraries

The Serra Mesa/Kearny Mesa Public Library, located 1 mile to the northeast of the project site, is the closest City library branch to the project site. The proposed project does not include any growth-inducing component such as housing and therefore would not result in an increased demand in library services from new residents. Consequently, the proposed project would not result in the need for new or modified services, and no impact would occur.

7.7.5 Parks

As discussed in further detail in Section 7.9, *Recreation*, the proposed project does not include a population-generating component that would in turn increase the use of existing neighborhood and regional parks, nor does it include recreational facilities or require the expansion of recreational facilities. Impacts would be less than significant.

7.8 Public Utilities

According to the City's CEQA Significance Determination Thresholds, the following issues provide guidance to determine potential significance of impacts on public utilities.

Issue 1: Would the proposed project result in the need for new systems or require substantial alterations to existing utilities, including those necessary for natural gas, water, sewer, communication systems, and solid waste management? If so, what physical impacts would result from the construction of these facilities?

7.8.1 Water

During construction of the roadway, water would likely be used for the purposes of dust suppression; however, this potential water use would be limited and temporary. Operational water use associated with the proposed roadway would be limited to that associated with the maintenance of the landscaping. As previously detailed in Chapter 3, *Project Description*, the landscaping of the proposed project would be drought-tolerant, native plants that would not require a significant amount of water. The proposed project would not create a water demand that would require the construction or expansion of water treatment facilities.

In terms of existing water supply, the proposed project would not exceed any of the City's Significance Determination Thresholds requiring further analysis and discussion of water demand and availability or require a Water Supply Assessment pursuant to Senate Bill 610. Water use during construction would be temporary and would not require large volumes of water, nor would the operational uses associated with the maintenance of landscaping. As such, there would be sufficient water supplies available from existing entitlements and resources to serve the proposed project, and new or expanded entitlements would not be required. Impacts on potable water supply would be less than significant.

7.8.2 Wastewater/Sewer

The proposed project would not introduce any uses or involve the construction of any structures that would generate wastewater or require the construction of new wastewater or sewage facilities. Therefore, no impacts related to wastewater would occur.

7.8.3 Solid Waste

The proposed project does not include construction of any structures or removal of any demolition debris to an existing landfill. Furthermore, as detailed in Chapter 3, *Project Description*, the proposed project does not require any soil to be removed from the project site; only fill would be required. As such, no impacts on solid waste capacity would occur from project construction. Once operational, the proposed project would not indirectly increase or generate solid waste because it would have no effect on population, and no direct impact would occur because solid waste would not be generated from the road's use. As such, the proposed project would not exceed the City's Significance Determination Thresholds or other applicable local and state regulations regarding solid waste management. No impact would occur.

7.8.4 Natural Gas

As described in Chapter 3, *Project Description*, the proposed project would construct a new portion of the gas transmission main to the preferred depth below the ground. The physical impacts related to this would occur within the project site, which is analyzed throughout this DEIR. As such, impacts on natural gas facilities would be less than significant.

7.8.5 Communication Systems

The proposed project would not require the installation of new communication systems as it entails the construction and operation of a roadway. Per standard construction practices, prior to any grading activities associated with construction, existing communication systems or lines underground would be marked and the contractor would work with the relevant companies in order to not disturb existing communication systems. No impact would occur.

7.9 Recreation

As the City of San Diego's CEQA Significance Determination Thresholds do not establish significance thresholds for recreation, the following issues from Appendix F of the State CEQA Guidelines provide guidance to determine potential significance of impacts on parks and recreational resources.

Issue 1: Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Issue 2: Does the proposed project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

As detailed within Chapter 3, *Project Description*, the linear Phyllis Place Park has two approved General Development Plans—one if the proposed project were not approved and another if it were. Under project implementation, the linear park would be slightly bifurcated by the proposed roadway connection but would retain the same acreage. In addition, the proposed roadway would be adjacent to a planned dog park that would be located to the west of the roadway.

The proposed project would slightly increase access to and availability of parks within the immediate vicinity of the roadway connection. However, access to these parks would also be available if the project was not implemented. The parks within the vicinity are generally smaller, neighborhood-serving recreational facilities that are not expected to attract a significant amount of visitors, with or without the project. Implementation of the proposed roadway would therefore not significantly deteriorate parks or other recreational facilities.

The proposed project does not include a population-generating component that would in turn increase the use of existing neighborhood and regional parks. The proposed project would include bike lanes on either side of the roadway as well as pedestrian pathways, which could be used for recreational purposes. These facilities are within the project site evaluated throughout this DEIR. Therefore, impacts related to parks and recreational facilities would be less than significant.

Chapter 8

Mandatory Discussion Areas

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Chapter 5, *Environmental Analysis*. These additional issues include (1) significant effects that cannot be avoided, (2) significant irreversible environmental changes that cannot be avoided if the project is implemented, and (3) growth-inducing impacts.

8.1 Significant Effects that Cannot Be Avoided

In accordance with State CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in an EIR. Based on the environmental analyses within this DEIR, the City has determined that the proposed project would result in significant and unavoidable impacts associated with the following issue area.

- Transportation and Circulation
 - Result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system
 - Result in a substantial impact on existing or planned transportation systems
 - Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature

8.1.1 Transportation/Circulation

The proposed project would result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system.

As shown in Table 5.2-15, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments. However, this analysis assumes that the mitigation measures would not be implemented (for the reasons detailed in Section 5.2.4.3) at the following segments:

- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue (**Impact TRAF-1**)
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road (**Impact TRAF-2**)

Therefore, impacts at these segments under the Near-Term scenario would be significant and unavoidable.

The proposed project would result in a substantial impact on existing or planned transportation systems.

As shown in Table 5.2-20, if mitigation were fully implemented, there would be less-than-significant impacts at the following roadway segments. However, this analysis assumes that the mitigation

measures would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following segments:

- Franklin Ridge Road from Via Alta to Civita Boulevard (**Impact TRAF-8**)
- Murray Ridge Road from Mission Center Road to Pinecrest Avenue (**Impact TRAF-9**)
- Murray Ridge Road from Pinecrest Avenue to Sandrock Road (**Impact TRAF-10**)
- Rio San Diego Drive from Qualcomm Way to Rio Bonito Way (**Impact TRAF-13**)

Therefore, impacts at these segments under the Long-Term scenario would be significant and unavoidable.

As shown in Table 5.2-22, if mitigation were fully implemented, there would be less-than-significant impacts at the following intersection. However, this analysis assumes that the mitigation measure would not be implemented (for the reasons detailed in Section 5.2.5.3) at the following intersection:

- Murray Ridge Road and Sandrock Road (**Impact TRAF-14**)

Therefore, impacts at this intersection under the Long-Term scenario would be significant and unavoidable.

As shown in Table 5.2-21, mitigation would improve level of service at the following intersections; however, it would not be reduced to an acceptable level at the following intersections in the PM peak hour.

- Murray Ridge Road/I-805 NB ramps; PM peak hour (**Impact TRAF-15**)
- Murray Ridge Road/I-805 SB ramps; PM peak hour (**Impact TRAF-16**)

Therefore, impacts at these intersections in the PM peak hour under the Long-Term scenario would be significant and unavoidable.

The proposed project would result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway).

The proposed project would require a signalized intersection along Phyllis Place, which would in turn result in possibly unsafe conditions for motorists entering or exiting the City View Church parking lot, as the driveway would be approximately 150 feet east of the signalized intersection. Therefore, impacts would be potentially significant and mitigation is required. If mitigation were fully implemented, traffic hazard impacts would be reduced to less-than-significant levels. However, this analysis assumes that the mitigation measure would not be implemented. Therefore, impacts would be significant and unavoidable (**Impact TRAF-19**).

8.2 Significant Irreversible Environmental Changes

CEQA and the State CEQA Guidelines require that an EIR address significant irreversible environmental changes that would result from a project should it be implemented. Section 15126.2(c) of the State CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would occur if the proposed project were to be implemented. Irreversible environmental changes typically fall into three categories: primary impacts, such as the

use of nonrenewable resources; secondary impacts, such as highway improvements that provide access to previously inaccessible areas; and environmental accidents associated with a project.

The predominant irreversible environmental change that would occur if the project were to be implemented would be the planned commitment of land resources to develop the proposed roadway. However, a portion of the project site (immediately south of Phyllis Place) would be developed as a park, even if the proposed project were not to be implemented. As previously detailed in Chapter 3, *Project Description*, the Phyllis Place Park would have two alignments—one with the proposed roadway and one without. Therefore, a portion of the site would be developed going forward. Nevertheless, implementation of the proposed project would irreversibly alter the remaining portion of the currently vacant project site by developing a roadway. This would constitute a permanent change. Following construction, restoring the land to its original condition is highly unlikely.

In addition, implementation of the proposed project would require a permanent commitment of non-renewable natural resources, primarily from the direct consumption of fossil fuels. These fossil fuels would be consumed during construction in the form of diesel and gasoline, which would be used in construction and yard equipment, commuter vehicles, trucks, and vessels. Electricity would also be consumed during construction by power tools and electric equipment and during operation for street lighting, although not all of it would be from non-renewable sources. The portion of electricity generated from fossil fuels, such as natural gas, however, would be irretrievable and irreversible.

Although the project would use non-recoverable materials and energy during construction and operational activities, the amounts needed would be provided through existing supplies and infrastructure. Therefore, the project's potential to result in irreversible environmental changes is related primarily to the use of fossil fuels for construction. However, as discussed in Chapter 7, *Effects Found Not To Be Significant*, impacts on energy use would not be significant.

The project site is currently vacant and does not convey vehicle traffic or generate associated effects, such as noise. Permanent changes as a result of the project would include vehicle traffic and related effects within the vicinity of the project site. However, as detailed throughout Chapter 5, *Environmental Analysis*, the proposed project would not result in any significant indirect impacts related to vehicle traffic, such as a significant increase in noise in the vicinity of the project site or the exposure of sensitive receptors to substantial pollutant concentrations, including air toxics.

Although the proposed project would increase traffic within the vicinity of the project site, impacts on local roadway segments and intersections would be mitigated where feasible (see Section 5.2, *Transportation and Circulation*). As previously detailed, significant and unavoidable traffic impacts of the proposed project would occur at roadway segments, intersections, and freeway segments in both the Near-Term (Year 2017) and Long-Term (Year 2035) scenarios, which represents an irreversible condition.

Regarding secondary impacts, the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The project site is also located in the vicinity of regionally significant transit facilities, including Metropolitan Transit System Trolley stations such as Rio Vista and Mission Valley. The proposed roadway would not provide access to a previously inaccessible area that could now be developed because of implementation of the roadway; rather, the proposed roadway would accommodate existing and planned near-term growth within the

vicinity of the project site. Furthermore, it would provide additional options for motorists, pedestrians, and cyclists to travel north and south between the Serra Mesa and Mission Valley communities.

Concerning environmental accidents, construction activities associated with the proposed project would use construction equipment, such as rollers and pavers. Although there is potential for an accident to happen during construction activities, construction activities would not require any regulated hazardous materials to be delivered to the project site or use any other materials that are not standard to roadway construction projects. In addition, the proposed project does not propose any uses that would regularly involve the use of hazardous materials.

8.3 Growth-Inducing Impacts

State CEQA Guidelines Section 15126.2(d) requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic development, population growth, or additional housing and how that growth would affect the surrounding environment. Direct growth inducement would result if a project, for example, involved construction of new housing. Indirect growth might occur if a project were to establish substantial new permanent employment opportunities that would stimulate the need for additional housing, utilities, and public services.

Similarly, a project would indirectly induce growth if it were to remove an obstacle to additional development, such as removing a constraint on a required public service or utility. A project that proposes to expand water supply capabilities in an area where limited water supply has historically restrained growth would be considered growth inducing.

The City's CEQA Significance Determination Thresholds (City of San Diego 2016) state that a project would have a significant impact related to growth inducement if it would:

1. Induce substantial population growth in an area;
2. Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
3. Include extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvement Project list when such infrastructure exceeds the needs of the project and could accommodate future development.

Per the State CEQA Guidelines, it should be noted that growth-inducing effects are not necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information about ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of implementing a project.

8.3.1 Population Growth

The project entails the construction and operation of a roadway connection and a Community Plan Amendment to the Serra Mesa Community Plan. No new residential units or other structures that would generate population would result from implementing the proposed project. Therefore, the proposed project would not directly result in population growth.

8.3.2 Substantially Alter Planned Growth

As previously detailed in Section 5.2, *Transportation and Circulation*, the proposed project would result in redistribution of area traffic patterns; however, no new traffic would be generated as a result of the project. Although the proposed roadway would provide a connection between two communities, it would not provide access to a previously inaccessible area. The Mission Valley and Serra Mesa communities are almost entirely developed and will continue to grow in accordance with the respective community plans. The proposed project would not be expected to alter the density or growth rate of the adjacent Quarry Falls development because this project has an approved specific plan that specifies the residential densities within the site. Therefore, the proposed project would not substantially alter the planned location, distribution, density, or growth rate of the population of an area.

8.3.3 Extension of Infrastructure

As previously detailed in Section 8.2, the project site is located within an entirely urbanized area that is accessible by multiple freeways, major local roadways (i.e., Friars Road), and smaller roadways that serve the residential areas in the vicinity of the site. The proposed roadway would accommodate existing and planned near-term growth within the vicinity of the project site. Furthermore, it would provide additional options for motorists, pedestrians, and cyclists to travel north and south between the Serra Mesa and Mission Valley communities.

Because the site is located within a community that is in the process of being nearly built out, all major public services and utilities currently service the project site. The proposed project would require storm drains or related stormwater management features; however, these would be sized to treat only the stormwater associated with the project itself. It would not provide surrounding development with stormwater treatment. Furthermore, no new infrastructure facilities for water supply or wastewater treatment would be required to accommodate the project. The proposed project would not result in the extension of major infrastructure facilities into areas that would induce population growth or reduce barriers to additional growth.

9.1 Overview

This chapter describes and analyzes a range of reasonable alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening one or more of the significant effects of the proposed project. The primary purpose of this chapter is to ensure that the comparative analysis provides sufficient detail to foster informed decision-making and public participation in the environmental process. Two alternatives to the proposed project are fully analyzed in this chapter and discussed in terms of their merits relative to the proposed project.

- Alternative 1 – No Project Alternative
- Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

Based on the analysis below, Alternative 2, Bicycle, Pedestrian, and Emergency Access Only Alternative, would be the environmentally superior alternative.

9.2 Requirements for Alternative Analysis

The State CEQA Guidelines require that an EIR present a range of reasonable alternatives to a project, or to the location of a project, that could feasibly attain a majority of the basic project objectives, but that would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are not feasible, or do not avoid or substantially lessen any significant environmental effects (State CEQA Guidelines, Section 15126.6(c)). In addition to the requirements described above, CEQA requires the evaluation of a No Project Alternative, which analyzes the environmental effects that would occur if the project were not to proceed (State CEQA Guidelines Section 15126.6(e)). Moreover, the EIR is required to identify the environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

9.3 Selection of Alternatives

In developing alternatives that meet the requirements of CEQA, the starting point is the proposed project’s objectives. The proposed project includes the following objectives.

1. Resolve the inconsistency between the Mission Valley Community Plan and the Serra Mesa Community Plan by providing a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa.
2. Improve local mobility in the Serra Mesa and Mission Valley planning areas.

3. Alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas.
4. Improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas.
5. Provide a safe and efficient street design for motorists, cyclists, and pedestrians that minimizes environmental and neighborhood impacts.

CEQA also requires that alternatives be potentially feasible. Feasible is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resources Code Section 21061.1). The State CEQA Guidelines elaborate that factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6). Finally, the alternatives should also avoid or substantially lessen one or more significant environmental impacts that would occur under the proposed project.

Table 9-1 summarizes the proposed project’s significant impacts, which have been identified to assist with focusing the analysis of alternatives in Section 7.5.

Table 9-1. Summary of Significant Effects of the Proposed Project

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Section 5.2 – Transportation and Circulation		
Increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system (direct and cumulative)	X	
Add a substantial amount of traffic to a congested freeway interchange or ramp (direct and cumulative)	X	
Result in a substantial impact upon existing or planned transportation Systems (cumulative)	X	
Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature	X	
Section 5.4 – Noise		
Result in a significant increase in the existing ambient noise levels from construction (direct and cumulative)		X
Section 5.5 – Biological Resources		
Have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP or other local or regional plans, policies, or regulations, or by CDFW or USFWS		X
Result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS		X
Section 5.7 – Historical and Tribal Cultural Resources		
Result in an alteration, including adverse physical or aesthetic effects,		X

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site; or tribal cultural resource		
Section 5.9 – Visual Effects and Neighborhood Character		
Result in substantial alteration in the existing landform		X

9.4 Alternatives Considered

Four alternatives were initially considered for evaluation. Based on the criteria described in Section 9.3, *Selection of Alternatives*, in addition to evaluating the No Project Alternative scenario, one other alternative was carried forward. The other alternatives that were considered, but rejected, included an alternate location alternative and an alternative concerning the removal of the roadway connection from the Mission Valley Community Plan, as discussed below.

9.4.1 Alternatives Considered but Rejected

9.4.1.1 Alternate Location Alternative

Alternative roadway alignments and locations were considered as part of the alternatives consideration process. The key question and first step in analysis of the off-site location “is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location” (State CEQA Guidelines Section 15126.6(f)(2)(A)).

As the project’s primary goal is to connect the Serra Mesa Community with the Mission Valley Community, the roadway connection between Phyllis Place and Friars Road provides a natural choice because it is the area between the two communities where there is currently no public street access. The City considered two alternative alignments near the project site. Both would be slightly to the east of the proposed alignment. However, it was determined that these alignments would not meet minimum design requirements for traffic signal spacing, and would be too close to the existing Interstate (I-) 805 ramps. Therefore, these alignments would potentially be infeasible from a technical standpoint, and have been eliminated from detailed consideration.

9.4.1.2 No Build/Remove from Mission Valley Community Plan Alternative

The No Build/Remove from Mission Valley Community Plan Alternative would not include the construction and operation of the roadway connecting Phyllis Place to Franklin Ridge Road/Via Alta, and would remove language regarding the potential connection from the Mission Valley Community Plan. This alternative was rejected from further consideration because it would not meet any of the project objectives, as detailed below.

1. This alternative would resolve the inconsistency between community plans; however, it would not provide a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa, as no roadway would be constructed, thereby limiting multi-modal options between these roadways. Therefore, it would not fully meet this objective.

2. This alternative would not improve local mobility in the Serra Mesa and Mission Valley planning areas, as no roadway would be constructed, thereby limiting routes between these planning areas.
3. This alternative would not help to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas, as no roadway would be constructed, thus limiting access options for those in the areas within the vicinity of the project site.
4. This alternative would also not improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas, as it would not provide additional ingress/egress for emergency responders, nor would an additional emergency evacuation route be created.
5. Finally, this alternative would not provide a safe and efficient street design for motorists, cyclists, and pedestrians, as no roadway would be constructed.

Furthermore, although this alternative would remove the language associated with the roadway connection, it would not resolve the inconsistency with other land use plans that have already been adopted. For example, the City's Climate Action Plan and Bicycle Master Plan ~~Update~~ include the proposed roadway connection in their assumptions. Therefore, this inconsistency would require additional environmental analysis prior to removal from the Mission Valley Community Plan, and the plans that indicate the connection would potentially need to be amended.

9.4.2 Alternatives Selected for Analysis

9.4.2.1 Alternative 1 – No Project Alternative

State CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. The No Project Alternative assumes that the proposed roadway connection and associated Community Plan Amendment to the Serra Mesa Community Plan would not occur. As such, the inconsistency between the Mission Valley and Serra Mesa Community Plan would remain, and any future proposal for a road connection would require an amendment to the Serra Mesa Community Plan.

Section 15126.6(e)(3) of the State CEQA Guidelines states that the no project analysis shall discuss the baseline existing conditions, as well as what would be reasonably 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. This discussion is provided below.

The project site is located partially within the boundary of the Quarry Falls site and partially within an undeveloped, primarily disturbed hillside. The project site is also within a San Diego Gas & Electric easement, which contains an energy transmission line (four transmission poles) running east-west at the northern portion of the project site, adjacent to Phyllis Place.

The physical existing conditions of the project site were previously detailed in Chapter 2, *Environmental Setting*. The project site is primarily disturbed, although it does not contain any buildings or structures. The project site contains one vegetation community (0.21 acre of disturbed coastal sage scrub) and two land cover types (0.77 acre of disturbed habitat and 1.07 acre of developed land).

As previously detailed in Chapter 3, *Project Description*, the northernmost portion of the project site (immediately south of Phyllis Place) is likely to be developed as a park if the proposed project were not to be implemented. There are two approved general development plans for the Phyllis Place Park—one with the proposed roadway and one without. Although a subsequent action to obtain a notice to proceed or grading permit may be required, the park was approved as part of the Quarry Falls Specific Plan and has conceptual design plans, grading plans, etc. Therefore, it is reasonable to assume that a portion of the site would be developed going forward under the No Project Alternative. The remaining portion of the project site is designated as “Open Space” within the Quarry Falls Specific Plan. Therefore, it is reasonable to assume that no other development within this portion of the project site would occur under the No Project Alternative.

9.4.2.2 Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

This alternative would provide a narrower roadway design, as it would not allow vehicle traffic aside from emergency responders. It would also provide access for pedestrians and cyclists. The roadway design would include bollards, gates, or another type of control subject to the approval of the San Diego Fire and Police Departments. The final width of the roadway design and type of control would be determined in conjunction with these departments. However, for the purposes of analysis, it can reasonably be concluded that the roadway would be narrower than the proposed project (120 feet wide), as it would only be required to include a bollard/gate and an entry on either side for pedestrians and cyclists. Due to the reduced width, it is also reasonable to assume that the construction schedule would be shorter for this alternative when compared to the proposed project. This alternative would still require an amendment to the Serra Mesa Community Plan, as it currently does not provide for any roadway connection.

9.5 Analysis of Alternatives

This section discusses each of the project alternatives and determines whether each alternative would avoid or substantially reduce any of the significant impacts of the proposed project. This section also identifies any additional impacts resulting from the alternatives that would not result from the proposed project and considers the alternatives’ respective relationships to the proposed project’s basic objectives. A summary comparison of the impacts of the alternatives under consideration relative to the proposed project is included as Table 9-2.

Table 9-2. Summary Impacts of Alternatives Relative to the Proposed Project

Environmental Resource	Proposed Project Determination	No Project (Alternative 1)	Bicycle, Pedestrian, and Emergency Access Only Alternative (Alternative 2)
Land Use	Less than Significant	Greater	Greater
Transportation and Circulation	Significant and Unavoidable	Greater	Greater
Air Quality	Less than Significant	Greater	Greater
Noise	Less than Significant with Mitigation	Reduced	Slightly Reduced
Biological Resources	Less than Significant with Mitigation	Reduced	Slightly Reduced
Paleontological Resources	No Impact	Similar	Similar
Historical and Tribal Cultural Resources	Less than Significant with Mitigation	Reduced	Slightly Reduced
Hydrology and Water Quality	Less than Significant	Reduced	Slightly Reduced
Visual Effects and Neighborhood Character	Less than Significant with Mitigation	Reduced	Slightly Reduced
Greenhouse Gases	Less than Significant	Greater	Greater

9.5.1 Analysis of Alternative 1 – No-Project Alternative

9.5.1.1 Land Use

This alternative would not construct the roadway and would not amend the Serra Mesa Community Plan to include the roadway connection. Consequently, this alternative would not resolve the inconsistency between the Serra Mesa and Mission Valley Community Plans regarding a roadway connection at Phyllis Place and would not provide expanded personal travel options for those in the vicinity of the proposed connection. The alternative would also not comply with the General Plan Street and Freeway System Goal of an interconnected street system that provides multiple linkages within and between communities, and the General Plan Policy LU-C.1.c, which calls for maintaining consistency between community plans and the General Plan. In addition, this alternative would not be consistent with the Climate Action Plan (CAP), as it would not construct the roadway connection, thus not reducing regional and study area vehicle miles traveled (VMT) and associated emissions.

The No-Project Alternative would not result in any interruption in the continuity of the proposed Phyllis Place Park and would not result in any disturbance to steep slopes. However, as identified in Section 5.1, *Land Use*, the proposed project would not result in significant impacts related to these issues, so the No Project Alternative would not substantially lessen a significant effect of the project in that regard.

Therefore, while the No-Project Alternative would not interrupt the park or result in disturbance to steep slopes, it would not provide a connection between communities or resolve the inconsistency between community plans. It would also not be consistent with the City's CAP, resulting in an

increase in VMT and associated emissions. Therefore, land use impacts associated with the No Project Alternative would be significant and greater than land use impacts that would result from the proposed project.

9.5.1.2 Transportation and Circulation

Roadway Capacity

Implementation of the No-Project Alternative, unlike the proposed project, would not add a roadway connection to the existing circulation network.

It should be noted that the traffic study area used within this DEIR was selected to identify where the proposed project would cause 50 or more trips to be redistributed to a roadway segment, intersection, freeway mainline segment, or freeway ramp. This methodology is consistent with the City's Traffic Impact Study Manual (1998), which is typically applied for development projects that generate traffic (e.g., shopping center or apartment complex). However, in the case of the proposed project, it would redistribute traffic patterns within the vicinity of the project site, which also has the possibility to improve traffic operations at certain locations. These locations are not necessarily captured within the study area but can be examined through the review of the Quarry Falls PEIR, which had a larger study area due to the size of the project. The results of the traffic analysis within the Quarry Falls PEIR are not presented within this section but are available for review at the City's website¹ while a hard copy is available at the Planning Department.²

As previously detailed in Chapter 3, *Project Description*, the Quarry Falls developer is adhering to an existing Mitigation Monitoring and Reporting Program (MMRP) related to roadway capacity impacts. Therefore, if the proposed project were not to be implemented, the Quarry Falls developer would still be required to implement roadway capacity mitigation measures in conjunction with buildout of the project. Where applicable, the existing mitigation measures required by the Quarry Falls MMRP are detailed below.

In order to evaluate the potential impacts of this alternative, the analysis within Section 5.2 details the Near-Term (Year 2017) without project and Long-Term (Year 2035) without project traffic conditions, detailed below.

Year 2017

The Near-Term (Year 2017) traffic scenario compares the Year 2017 (near-term year) with project conditions to study area roadway, intersection, and freeway facility conditions without the proposed road connection.

As detailed under Issue 1 within Section 5.2, *Transportation and Circulation*, the proposed project would impact four roadway segments; however, impacts on two of those roadway segments would be less than significant with mitigation incorporated. As shown in Table 5.2-10, under the No-Project Alternative, the following three roadway segments would operate at an unacceptable level of service (LOS).

- Mission Center Road, from Aquatera Driveway to Murray Ridge Road

¹ <https://www.sandiego.gov/planning/programs/ceqa>

² 1010 Second Avenue, Suite 1200, East Tower, M.S. 413, San Diego, CA 92101

- Murray Ridge Road, from the I-805 northbound (NB) ramp to Mission Center Road
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue

Mitigation for impacts on roadway segments typically involves widening of the roadway. It is unlikely that the segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road would be able to be widened as mitigation in that segment, as there are sensitive biological resources protected as Multi-Habitat Planning Area (MHPA) on both sides of this roadway. Impacts on the MHPA are generally discouraged by existing City regulations or require mitigation for impacts on sensitive vegetation communities (i.e., a 3:1 ratio for impacts).

Concerning Murray Ridge Road segments, the Quarry Falls MMRP states that the applicant shall improve these segments to a four-lane collector and contribute funds for traffic calming.

The proposed project would impact three intersections; however, impacts to these intersections would be less than significant with mitigation incorporated. As shown in Table 5.2-11, the No-Project Alternative would result in one intersection operating at an unacceptable LOS under this scenario:

- Friars Road and Northside Drive (LOS E, PM peak hour)

Mitigation for impacts on intersection delay would likely be available through reconfiguration of turn lanes, signal timing, or other related measures. Therefore, it is assumed for purposes of this analysis that these impacts would be reduced to less-than-significant levels.

The proposed project would decrease VMT within the study area and the region in future years compared to future year baselines and therefore would result in a less-than-significant impact on freeway mainline segments. The No-Project Alternative would not decrease VMT within the study area and the region and therefore would result in a significant impact on freeway mainline segments. There is no mitigation identified to reduce impacts related to VMT.

The proposed project would not impact any freeway ramps, and Table 5.2-12 shows that the No-Project Alternative would similarly not result in any impacts on freeway ramps.

Year 2035

The Long-Term (Year 2035) traffic scenario evaluates the proposed project's potential contribution to cumulative impacts on the planned transportation system and compares the Year 2035 (Serra Mesa Community Plan buildout) with project conditions to study area roadway, intersection, and freeway facility conditions without the proposed road connection.

As detailed under Issue 3 within Section 5.2, *Transportation and Circulation*, the proposed project would impact six roadway segments; however, impacts on two of those roadway segments would be less than significant with mitigation incorporated. As shown in Table 5.2-16, under the No-Project Alternative, the following six roadway segments would operate at an unacceptable LOS.

- Mission Center Road, from Aquatera Driveway to Murray Ridge Road
- Murray Ridge Road, from the I-805 NB ramp to Mission Center Road
- Murray Ridge Road, from Mission Center Road to Pinecrest Avenue
- Murray Ridge Road, from Pinecrest Avenue to Sandrock Road
- Phyllis Place, from the I-805 southbound (SB) ramp to the I-805 NB ramp

- Rio San Diego Drive, from Qualcomm Way to Rio Bonito Way

Mitigation for impacts on roadway segments typically involves widening of the roadway. As previously detailed, it is unlikely that the segment of Mission Center Road from Aquatera Driveway to Murray Ridge Road would be able to be widened as mitigation in that segment, as there is an MHPA on both sides of this roadway.

As previously detailed in Section 5.4.2.3, mitigation was identified on several segments of Murray Ridge Road; however, the City's ability to implement these measures may be limited. Due to the uncertainty of being able to implement these measures in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

Impacts along the Phyllis Place segment would be mitigated similar to the proposed project; see mitigation measure **MM-TRAF-11** within Section 5.2.5.3.

As previously detailed in Section 5.4.2.3, mitigation was identified for the segment of Rio San Diego Drive; however, the City's ability to implement this measure may be limited. Due to the uncertainty of being able to implement this measure in light of countervailing considerations, this analysis does not assume it will occur. In the event it does not, the impact would remain significant and unavoidable.

The proposed project would result in a significant long-term cumulative impact on four intersections; however, impacts on three of these intersections (depending on peak hour) would be less than significant with mitigation incorporated. As shown in Table 5.2-17, the following five intersections would operate at an unacceptable LOS under the No-Project Alternative.

- Friars Road and Northside Drive (LOS E, PM peak hour)
- Mission Center Road and Murray Ridge Road/Phyllis Place (LOS E and F, AM and PM peak hour, respectively)
- Murray Ridge Road and the I-805 SB ramp (LOS E, PM peak hour)
- Qualcomm Way and Friars Road eastbound (EB) ramp (LOS E, PM peak hour)
- Qualcomm Way and Friars Road westbound (WB) ramp (LOS F, PM peak hour)

Mitigation for impacts on intersection delay would likely be available through reconfiguration of turn lanes, signal timing, or other related measures. Therefore, it is assumed for purposes of this analysis that these impacts would be reduced to less-than-significant levels.

The proposed project would decrease VMT within the study area and the region in the Long-Term Scenario and therefore would result in a less-than-significant impact on freeway mainline segments. The No-Project Alternative would not decrease VMT within the study area and the region and therefore would result in a significant impact on freeway mainline segments. There is no mitigation identified to reduce impacts related to VMT.

Under the proposed project, one metered on-ramp is projected to operate with more than 15 minutes of delay during the PM peak hour; however, impacts on this freeway ramp would be less than significant with mitigation incorporated. As shown in Table 5.2-18, no freeway ramps under the No-Project Alternative would operate with more than 15 minutes of delay.

Traffic Hazards

The No-Project Alternative would not construct a roadway and therefore would not result in inadequate sight distance for motorists exiting from the City View Church driveway.

Alternative Transportation

The No-Project Alternative would not construct a roadway connection that could be used by pedestrians and cyclists in the vicinity of the project site. There is also a possibility that the roadway connection could be used as a new bus route (if Metropolitan Transit System decided to use the connection for a new bus route); however, the inclusion of a potential bus route is speculative.

Conclusion

In the Near-Term Scenario, it is unlikely that the No-Project Alternative could reduce roadway segment impacts on Mission Center Road from Aquatera Driveway to Murray Ridge Road; however, the proposed project would result in significant and unavoidable impacts along three roadway segments. In the Long-Term Scenario, the No-Project Alternative would result in similar significant and unavoidable impacts regarding roadway segments, and similar significant but mitigable impacts to intersections.

The No-Project Alternative would not decrease VMT within the study area or region and thus would result in a significant and unavoidable impact on freeway mainline segments. In addition, the No-Project Alternative would not provide a connection for alternative transportation users, including cyclists and pedestrians. This alternative would not, however, result in inadequate sight distance for motorists exiting the City View Church driveway. Overall, this alternative would result in greater impacts compared to the proposed project primarily due to the increase in VMT and, similarly, impacts would be significant and unavoidable.

9.5.1.3 Air Quality

The No-Project Alternative would not result in significant emissions associated with construction; however, as previously detailed within Section 5.3, *Air Quality*, the proposed project's impact related to construction emissions would be less than significant. Concerning operational emissions, the No-Project Alternative would result in greater impacts because regional VMT would increase when compared to the proposed project. The increase in regional VMT would likewise increase air pollutant emissions associated with vehicle trips. Therefore, air quality impacts associated with the No-Project Alternative would be greater than air quality impacts that would result from the proposed project and would be significant and unavoidable. There is no feasible mitigation that would reduce the impact associated with the increase of regional VMT and associated emissions.

9.5.1.4 Noise

The No-Project Alternative would entail construction activities for the park site, but it would not be expected to result in significant noise or vibration impacts associated with construction. As previously detailed within Section 5.4, *Noise*, the proposed project's impact related to construction noise and vibration would be less than significant with mitigation incorporated. Therefore, construction impacts associated with the No-Project Alternative would be less than significant and reduced when compared to the proposed project.

9.5.1.5 Biological Resources

The No-Project Alternative would not result in any impacts associated with the removal of sensitive vegetation communities. The No-Project Alternative would have the potential to result in indirect impacts on raptors or other migratory birds if the species nests in trees adjacent to the project site during construction of the Phyllis Place Park site. Overall, the No-Project Alternative would slightly reduce biological resource impacts when compared to the proposed project, as it would not remove any vegetation and impacts would be less than significant with similar project mitigation for nesting raptors.

9.5.1.6 Paleontological Resources

The No-Project Alternative would not result in any impacts on paleontological resources, because grading activities for the park site would not extend to a depth that would be expected to disturb paleontological resources. Additional grading activities required for the proposed project would not be required under the No-Project Alternative, as no roadway would be constructed. However, as previously detailed in Section 5.6, *Paleontological Resources*, the proposed project would not affect paleontological resources, as it entails the placement of fill and no extensive excavation activities are required. Therefore, this alternative would have similar impacts to the proposed project, as no impact would occur.

9.5.1.7 Historical and Tribal Cultural Resources

The No-Project Alternative is not expected to result in significant impacts during construction of the park site. Additional grading activities required for the proposed project would not be required under the No-Project Alternative, as no roadway would be constructed. Therefore, this alternative would slightly reduce impacts when compared to the proposed project, and impacts would be less than significant.

9.5.1.8 Hydrology and Water Quality

The No-Project Alternative would include the Phyllis Place Park within a portion of the project site. The design of the park site includes relevant best management practices and other stormwater quality controls that are required. In addition, the No-Project Alternative would not disturb the amount of impervious surface as the project or include a roadway that would generate pollutants. Therefore, this alternative would reduce impacts when compared to the proposed project, and impacts would be less than significant.

9.5.1.9 Visual Effects and Neighborhood Character

The No-Project Alternative would include the Phyllis Place Park within a portion of the project site, which would disturb only a portion of the project site. The remainder of the project site would remain vacant, as it is designated for open space within the Quarry Falls Specific Plan. Therefore, this alternative would reduce impacts when compared to the proposed project, and impacts would be less than significant.

9.5.1.10 Greenhouse Gases

The No-Project Alternative would not result in emissions associated with construction; however, as previously detailed within Section 5.10, *Greenhouse Gases*, the proposed project's impact related to

construction emissions would be less than significant. Concerning operational emissions, the No-Project Alternative would result in greater impacts because regional VMT would increase when compared to the proposed project. The increase in regional VMT would likewise increase air pollutant emissions associated with vehicle trips. In addition, the No-Project Alternative would not be consistent with the City's CAP because it would increase regional VMT, which would in turn increase GHG emissions. The CAP's primary purpose is to reduce GHG emissions within the City. Therefore, GHG impacts associated with the No-Project Alternative would be greater than the proposed project and would be significant and unavoidable. There is no feasible mitigation that would reduce the impact associated with the increase of regional VMT and associated emissions.

9.5.1.11 Relationship to Project Objectives

The No-Project Alternative would not meet any of the project objectives. This alternative would not provide a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa because no roadway would be constructed, thereby limiting multi-modal options between these roadways. The No-Project Alternative would not improve local mobility in the Serra Mesa and Mission Valley planning areas because no roadway would be constructed, thereby limiting routes between these planning areas. It would not help to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas because no roadway would be constructed, thus limiting access options for those in the areas within the vicinity of the project site. The No-Project Alternative would also not improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas because it would not provide additional ingress/egress for emergency responders, nor would an additional emergency evacuation route be created. Finally, this alternative would not provide a safe and efficient street design for motorists, cyclists, and pedestrians, as no roadway would be constructed.

9.5.2 Analysis of Alternative 2 – Bicycle, Pedestrian, and Emergency Access Only Alternative

9.5.2.1 Land Use

This alternative would construct a roadway that would not be available to motorists and would amend the Serra Mesa Community Plan. Unlike the proposed project, this alternative would not resolve the inconsistency between the Serra Mesa and Mission Valley Community Plans because the Mission Valley Community Plan stated that a roadway with "adequate capacity" would be required (referring to vehicle carrying capacity). Although this alternative would provide expanded personal travel options for pedestrians and cyclists, it would not provide an alternative route for motorists within the vicinity of the proposed connection.

The alternative would also not comply with the General Plan Street and Freeway System Goal of an interconnected street system that provides multiple linkages within and between communities, and the General Plan Policy LU-C.1.c, which calls for maintaining consistency between community plans and the General Plan. In addition, this alternative would not be consistent with the CAP, as it would not construct a roadway connection for vehicles, thus not decreasing regional VMT and associated emissions.

The Bicycle, Pedestrian, and Emergency Access Only Alternative would result in a lesser interruption in the continuity of the proposed Phyllis Place Linear Park due to the reduced width.

This alternative would also require disturbance to steep slopes. However, as identified in Section 5.1, *Land Use*, because construction of this alternative would be similar to the proposed project, it would not result in significant impacts related to these issues.

Therefore, although this alternative would provide a connection for pedestrians and cyclists between communities, it would not resolve the inconsistency between community plans. It would also not be consistent with the City's CAP, as it would not decrease VMT and associated emissions. Overall, land use impacts under this alternative would be greater when compared to the proposed project and would be significant.

9.5.2.2 Transportation and Circulation

Roadway Capacity

Implementation of the Bicycle, Pedestrian, and Emergency Access Only Alternative would result in the same impacts as those of the No-Project Alternative (see Section 9.5.1.2, above), as it would not be available for use by motorists.

Traffic Hazards

Implementation of this alternative would not result in any traffic hazards, as there would not be a need for the signalized intersection at Phyllis Place and therefore there would be adequate sight distance for motorists exiting City View Church.

Alternative Transportation

Implementation of this alternative would provide a new route for pedestrians and cyclists and would therefore be similar to the proposed project.

Conclusion

In the Near-Term Scenario, it is unlikely that this alternative could reduce roadway segment impacts on Mission Center Road from Aquatera Driveway to Murray Ridge Road; however, the proposed project would result in significant and unavoidable impacts along three roadway segments. In the Long-Term Scenario, this alternative would result in similar significant and unavoidable impacts regarding roadway segments, and similar significant but mitigable impacts to intersections.

Although the proposed project would result in more impacts under the Near-Term (Year 2017) scenario, the Bicycle, Pedestrian, and Emergency Access Only Alternative would result in slightly more significant impacts under the Long-Term (Year 2035) scenario. It would not decrease VMT within the study area or region and thus would result in a significant and unavoidable impact on freeway mainline segments. The Bicycle, Pedestrian, and Emergency Access Only Alternative would not result in any traffic hazards and would provide a connection for alternative transportation users, including cyclists and pedestrians. Overall, this alternative would result in slightly greater impacts compared to the proposed project as it would not decrease VMT and impacts would similarly be significant and unavoidable.

9.5.2.3 Air Quality

This alternative would result in similar construction emissions as the proposed project, which would be less than significant. Concerning operational emissions, the Bicycle, Pedestrian, and

Emergency Access Only Alternative would result in greater impacts because VMT would decrease, as it would under the proposed project, which would likewise increase air pollutant emissions associated with vehicle trips. Therefore, this alternative would result in greater air quality impacts than the proposed project, and impacts would be significant and unavoidable as no mitigation is available to reduce impacts associated with VMT.

9.5.2.4 Noise

This alternative would result in slightly reduced noise and vibration impacts associated with construction, as construction activities would not last as long as the proposed project due to the narrower roadway. As previously detailed within Section 5.4, *Noise*, the proposed project's impact related to construction noise and vibration would be less than significant. Therefore, impacts under this alternative would be slightly reduced when compared to the proposed project and would be less than significant.

9.5.2.5 Biological Resources

This alternative would result in slightly reduced biological resource impacts associated with construction, as this alternative would construct a narrower roadway, resulting in fewer impacts on vegetation communities and also reducing construction noise impacts due to a shorter construction schedule. Therefore, impacts under this alternative would be slightly reduced when compared to the proposed project and would be less than significant with the implementation of similar project mitigation measures.

9.5.2.6 Paleontological Resources

This alternative would not result in any impacts on paleontological resources, as site preparation activities would be similar to the proposed project. As previously detailed, it would entail the placement of fill, and no extensive excavation activities are required. Therefore, this alternative would have similar impacts to the proposed project, as no impact would occur.

9.5.2.7 Historical and Tribal Cultural Resources

This alternative would result in slightly reduced historical and Tribal Cultural Resources impacts associated with construction, as this alternative would construct a narrower roadway, thus slightly decreasing the potential to disturb historical and Tribal Cultural Resources. Therefore, impacts under this alternative would be slightly reduced when compared to the proposed project and would be less than significant with the implementation of similar project mitigation measures.

9.5.2.8 Hydrology and Water Quality

This alternative would result in slightly reduced hydrology and water quality impacts associated with construction, as this alternative would construct a narrower roadway, thus decreasing the amount of impervious surfaces disturbed. In addition, vehicles would not be regularly using the roadway (aside from occasional emergency vehicles) and the alternative therefore would generate fewer pollutants than the operation of the proposed project. Consequently, impacts under this alternative would be reduced when compared to the proposed project and would be less than significant.

9.5.2.9 Visual Effects and Neighborhood Character

This alternative would result in slightly reduced visual impacts associated with construction, as this alternative would construct a narrower roadway, thus decreasing the amount of roadway that would be visible, and would not result in vehicles using the roadway. This alternative would similarly require the disturbance of steep slopes as classified by the City's Environmentally Sensitive Lands Regulations. Therefore, impacts under this alternative would be slightly reduced when compared to the proposed project and would be less than significant with the implementation of similar project mitigation.

9.5.2.10 Greenhouse Gases

This alternative would result in slightly reduced emissions associated with construction due to the shorter construction schedule; however, as previously detailed within Section 5.10, *Greenhouse Gases*, the proposed project's impact related to construction emissions would be less than significant. Concerning operational emissions, the Bicycle, Pedestrian, and Emergency Access Only Alternative would result in greater impacts because regional VMT would increase when compared to the proposed project. The increase in regional VMT would likewise increase air pollutant emissions associated with vehicle trips. In addition, this alternative would not be consistent with the City's CAP because it would not decrease VMT, which would in turn fail to decrease GHG emissions. The CAP's primary purpose is to reduce GHG emissions within the City. Therefore, GHG impacts associated with this alternative would be greater than the proposed project and would be significant and unavoidable. There is no feasible mitigation that would reduce the impact associated with the increase of regional VMT and associated emissions.

9.5.2.11 Relationship to Project Objectives

The Bicycle, Pedestrian, and Emergency Access Only Alternative would fully meet Objective #4 while partially meeting Objectives #2 and #5. This alternative would meet Objective #4 because it would improve emergency access and evacuation route options between the Serra Mesa and Mission Valley planning areas. It would partially meet Objective #2 because it would improve local mobility in the Serra Mesa and Mission Valley planning areas for pedestrians and cyclists, but would not improve mobility for vehicles. It would partially meet Objective #5 because it would provide a safe and efficient design for cyclists and pedestrians but would not provide an efficient design for motorists, as they would be unable to use the roadway.

This alternative would not resolve the inconsistency between community plans and would not provide a multi-modal linkage from Friars Road in Mission Valley to Phyllis Place in Serra Mesa because no motorists would be allowed to use the roadway. This alternative would not help to alleviate traffic congestion and improve navigational efficiency to and from local freeway on- and off-ramps for the surrounding areas because the roadway would not be available to be used by motorists, thus limiting options for motorists in the areas within the vicinity of the project site.

9.5.3 Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. When the environmentally superior alternative is the No-Project Alternative, CEQA requires that another alternative be identified. As indicated in the comparative analysis on the pages that preceded, the No-Project Alternative reduces impacts within several issue areas—such as biological resources,

historical and tribal cultural resources, and visual effects—and is therefore identified as the environmentally superior alternative. It should be noted, however, that these impacts would be mitigated to less-than-significant levels under the proposed project.

However, because the No-Project Alternative is identified as the environmentally superior alternative, CEQA requires that a design alternative be identified as the environmentally superior alternative. For this reason, the Bicycle, Pedestrian, and Emergency Access Only Alternative is identified as the environmentally superior alternative. This alternative would slightly reduce impacts associated with construction (i.e., biological resources, historical and tribal cultural resources) due to the narrower roadway and shorter duration of construction.

It should be noted, however, that both alternatives would result in significant and unavoidable impacts that would not result under implementation of the proposed project, as they would not decrease VMT within the study area or the region. Therefore, both alternatives would result in greater impacts associated with transportation and traffic, air quality, and GHG emissions than the proposed project.

Chapter 10

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