



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
Date of Notice: December 23, 2013
PUBLIC NOTICE OF PREPARATION OF A
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Internal Number: 21002568

PUBLIC NOTICE: The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a PEIR and Scoping Meeting was publicly noticed and distributed on December 23, 2013. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at, <http://sandiego.gov/city-clerk/officialdocs/notices/>. The document will be posted under the subheading CEQA Notices and Documents.

SCOPING MEETING: A public scoping meeting will be held by the City of San Diego's Development Services Department on Thursday, **January 9, 2014, beginning at 6:00 PM and running no later than 8:00 PM at the Santa Fe Room in Balboa Park, 2150 Pan American Road, San Diego, CA 92101. Please note that depending upon the number of attendees; the meeting could end earlier than 8:00 PM.** Verbal and written comments regarding the scope and alternatives of the proposed EIR will be accepted at the meeting.

SCOPING RESPONSE: Please send in written comments to the following address: **A. McPherson, AICP, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to DSDEAS@sandiego.gov with the Project Name in the subject line within 30 days of the receipt of this notice/date of the Public Notice above. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A PEIR incorporating public input will then be prepared and distributed for the public to review and comment.

PROJECT NAME: COMMUNITY PLAN UPDATES FOR THE UPTOWN – NORTH PARK – GREATER GOLDEN HILL COMMUNITIES

SCH No.: *Pending*

COMMUNITY PLAN AREAS: Uptown, North Park, Greater Golden Hill

COUNCIL DISTRICT: 3 (Gloria)

SUBJECT:

General Project Description:

- Three comprehensive community plan updates to be consistent with and to incorporate relevant policies from the 2008 City of San Diego General Plan;
- Amendment to the 2008 General Plan to incorporate the updated community plans as components of the Land Use Element;
- Implementation Program to include the application of citywide zoning pursuant to the City of San Diego Land Development Code (LDC) and community-specific tailored zoning similar to the existing adopted Planned District Ordinances (PDOs). It is anticipated that the community-specific tailored zoning will occur through a Community Plan Implementation Overlay Zone (CPIOZ). The Implementation Program may change land uses and development standards within existing zone districts or within specific sites or areas within each community; and
- Comprehensive updates to the three existing Public Facilities Financing Plans (PFFPs)

Detailed Project Components:

- Identification of Village types consistent with General Plan policies regarding village land use and design policies, including: appropriate land use intensity and density, mobility improvements, provision of public space (including zoning incentives or bonuses);
- Conversion of land use categories to those specified in the General Plan;
- Designation of the appropriate residential density and intensity of uses, based upon General Plan guidance and existing opportunities and constraints;
- Development of design guidelines within each urban design element to address: building height (including a reduction in the maximum height permitted in Uptown), commercial storefronts in mixed-use development, context sensitive design, and scale transitions and buffers between existing and new development where necessary;
- Identification of improvements to existing mobility infrastructure to increase bicycle, pedestrian and transit use, including a separate study for a streetcar line in Uptown;
- Preservation of neighborhood character and historic resources through the identification of new and expanded historic districts, and the development of design guidelines for single-family and hillside neighborhoods.
- Designation of new park sites and the establishment of community-specific park equivalencies consistent with the General Plan.
- Revisions to the open space boundary in each planning area based upon updated open space mapping to exclude developed areas and identify areas for resource conservation (including a MHPA boundary correction).

APPLICANT: City of San Diego Planning, Neighborhoods & Economic Development Department

RECOMMENDED FINDING: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project could potentially result in significant environmental impacts in the following areas: **Land Use, Visual Quality and Neighborhood Character, Transportation/Circulation/Parking, Air Quality, Global Climate Change, Noise, Historical Resources, Biological Resources, Geologic Conditions,**

Paleontological Resources, Hydrology/Water Quality, Public Services and Facilities, Public Utilities, and Health and Safety.

AVAILABILITY IN ALTERNATIVE FORMAT: To request this Notice in alternative format, call the Development Services Department at (619) 446-5460 immediately to ensure availability. This information is also available in alternative formats for persons with disabilities. To request this Notice in alternative format, call (619) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

ADDITIONAL INFORMATION: For information on environmental review and/or information regarding this project, contact Anna McPherson at (619) 446-5276. Supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Department. For information regarding public meetings/hearings on this project, contact Marlon Pangilinan and/or Bernard Turgeon, Project Managers, at (619) 235-5293 and (619) 533-6575, respectively. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego website <http://sandiego.gov/city-clerk/officialdocs/notices/> and distributed on December 23, 2013.

Cathy Winterrowd, Deputy Director
Planning, Neighborhoods, and Economic
Development Department

DISTRIBUTION: See attached

ATTACHMENTS: Location Map
Scoping Letter

DISTRIBUTION:

Federal Government

U.S. Environmental Protection Agency
U.S. Fish & Wildlife Service
U.S. Army Corps of Engineers

State of California

Department of Transportation, District 11
California Department of Fish & Wildlife
Department of Toxic Substance Control
California Regional Water Quality Control Board: Region 9
State Clearinghouse
Air Resources Board
California Transportation Commission
Office of Planning and Research

County of San Diego

Department of Planning and Land Use/Environmental Planning Section
Department of Environmental Health

City of San Diego

Office of the Mayor
Councilmember Lightner, District 1
Councilmember Falconer, District 2
Councilmember Gloria, District 3
Councilmember Cole, District 4
Councilmember Kersey, District 5
Councilmember Zapf, District 6
Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Emerald, District 9

Office of the City Attorney

Development Services Department
Bob Vacchi, Director
Cathy Winterrowd, Interim Deputy Director
Ann Gonsalves, Transportation Review
Don Weston, Engineering Review
James Quinn, Geology Review

Planning, Neighborhood, and Economic Development Department
Bill Fulton, Director
Nancy Bragado, Deputy Director
Samir Hajjiri, Mobility Planning

Marlon Pangilinan, Community Planner
Bernard Turgeon, Community Planner
Jeanne Krosch, MSCP
Howard Greenstein, Park Planning

Public Utilities Department
Water Review
Wastewater Review

Fire and Life Safety Services

Environmental Services Department

Library Department - Government Documents
Central Library
Mission Hills Branch Library
North Park Branch Library

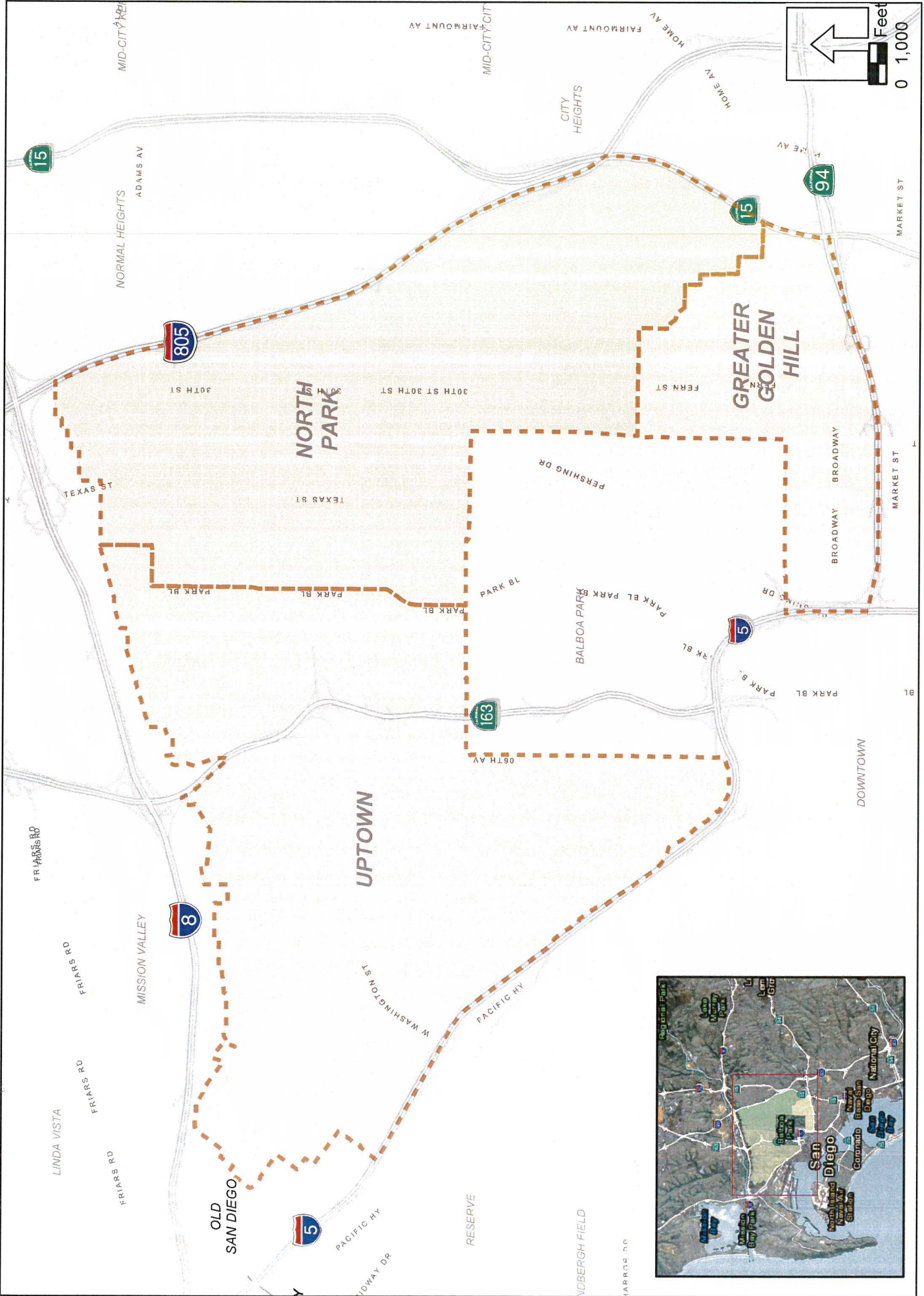
Other Interested Agencies, Organizations, and Individuals

San Diego Unified School District
SANDAG
Metro Transit System
San Diego Gas and Electric
Kim Adler
Gary Boner
Ernestine Bonn
Eric Bowlby, San Diego Canyonlands
Rhett Butler
Bruce Coons, SOHO
Roy Dahl
Anu Delouri, UCSD Resource Management and Planning
Ian Epley
Neil Ferrier
Tom Fox
Jim Frost
Ann Garwood
Dave Gatzke
Sharon Gehl
Younger Glenn
Rich Gorin
Robert Grinchuk
Barry Hager, Mission Hills Heritage
Jonathon Hale, Hillcrest Business Association
Elizabeth Hannon
Beth Jaworski
John Lamb

Richard Ledford
Deidre Lee
Bruce Leidenberger
Don Liddell
James Mellos III
Tom Mulaney
Joe Naskar
Janet O'Dea
Jennifer Pesqueira
Jeanne Rawlings
Scott Sandel
Michael Seidel
Jake Sutton
Ken Tablang
Andrew Towne
Gerrie Trussell, Mission Hills BID
Chris Ward
Stuart White, Mission Hills BID
Leo Wilson, Uptown Planners
Ann Wilson, Community Housing Works
Leo Wilson, Metro San Diego CDC
Tony Winney
Middletown Property Owners Association
Hillside Protection Association
Banker's Hill Canyon Association
Allen Canyon Committee
Vicki Granowitz, North Park Planning Committee
Robert Barry
Howard Blackson
Kitty Calen
Dionne Carlson
Cheryl Dye
George Franck
Daniel Gebreselassie
Kristin Harms, University Heights Historical Society
Peter Hill
Brandon Hilpert
Katherine Hon
Scott Kessler, Adams Business Association
Angela Landsberg, North Park Main Street
Richard Lewis
Sarah Mclear
Carl Moczydlowsky
Lucky Morrison
Dang Nguyen
Omar Passons

Rick Pyles
Susan Riggs-Tinsky, San Diego Housing Federation
Rob Steppke
Lynn Susholtz
Rene Vidales
Gary Weber, The Boulevard BIA
Burlingame Homeowners Association
Friends of Switzer Canyon
North Park Community Association
Ruchell Alvarez, Greater Golden Hill Planning Committee
Richard Baldwin
Cheryl Brierton
Susan Bugbee
Michael Burkart
Ashley Christensen
Janice Davis
John Kroll
Richard Santini
Pat Shields
David Strickland
David Swarens
Matt Thomas
Angela Vasconcellos
Kathryn Willits
Mark Kratzchar
Connie McDonough
Rick Accurson
Beri Varol
Barbara Houlton
Skillman
Kathy Vandenheuvel
David Caldwell
Susanna Starcevic
Tershia D'Elgin
Carole Caffey
Laurie Burgett
Alex hempton
Jon Stamatopoulos
Greater Golden Hill Community Development
Sierra Club San Diego Chapter
Wetland Advisory Board
San Diego Audubon Society
Mr. Jim Peugh
California Native Plant Society
Endangered Habitats League
Historical Resources Board

Carmen Lucas
South Coastal Information Center
San Diego Archaeological Center
Ron Christman
Clint Linton
Frank Brown – Intertribal Cultural Resources Council
Campo Band of Mission Indians
San Diego County Archeological Society, Inc.
Kumeyaay Cultural Heritage Preservation
Kumeyaay Cultural Repatriation Committee
Native American Distribution
Native American Heritage Distribution



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THE CITY OF SAN DIEGO

MEMORANDUM

DATE: December 20, 2013

TO: Marlon Pangilinan and Bernard Turgeon, AICP, Senior Planners, Planning, Neighborhoods, and Economic Development Department

FROM: Cathy Winterrowd, Deputy Director, Planning, Neighborhoods, and Economic Development Department

SUBJECT: Scope of Work for a Program Environmental Impact Report for the Uptown – North Park – Greater Golden Hill Community Plan Updates Project

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City of San Diego Development Services Department has determined that the proposed project may have significant effects on the environment, and the preparation of a Program Environmental Impact Report (PEIR) is required for the Uptown – North Park – Greater Golden Hill Community Plan Updates Project.

The purpose of this letter is to identify the specific issues to be addressed in the PEIR. The PEIR shall be prepared in accordance with the "City of San Diego Technical Report and Environmental Impact Guidelines" (Updated December 2005). The project issues to be discussed in the PEIR are outlined below. A Notice of Preparation (NOP) will be distributed to Responsible Agencies and others who may have an interest in the project as required by CEQA Section 21083.9(a) (2).

Scoping meetings are required by CEQA Section 21083.9 (a) (2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets the threshold. A scoping meeting has been scheduled for Thursday, January 9, 2014 from 6:00 to 8:00 PM at the Santa Fe Room in Balboa Park at 2150 Pan American Road, San Diego, CA 92101.

Please note, changes or additions to the scope of work may be required as a result of public input received in response to the Notice of Preparation and Scoping Meeting. In addition, the applicant may adjust the project over time, and any such changes would be disclosed in the PEIR.

Each section and issue area of the Program EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation. The Draft Program EIR should also include sufficient graphics and tables to provide a complete description of all major project features.

Project Description

The proposed project involves comprehensive updates to the Uptown, North Park, and Greater Golden Hill Community Plans.

General Project Description:

- Three comprehensive community plan updates to be consistent with and to incorporate relevant policies from the 2008 City of San Diego General Plan;
- Amendment to the 2008 General Plan to incorporate the updated community plans as components of the Land Use Element;
- Implementation Program to include the application of citywide zoning pursuant to the City of San Diego Land Development Code (LDC) and community-specific tailored zoning similar to the existing adopted Planned District Ordinances (PDOs). It is anticipated that the community-specific tailored zoning will occur through a Community Plan Implementation Overlay Zone (CPIOZ). The Implementation Program may change land uses and development standards within existing zone districts or within specific sites or areas within each community; and
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Detailed Project Components:

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- Designation of the appropriate residential density and intensity of uses, based upon General Plan guidance and existing opportunities and constraints;
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- Identification of improvements to existing mobility infrastructure to increase bicycle, pedestrian and transit use, including a separate study for a streetcar line in Uptown;
- Preservation of neighborhood character and historic resources through the identification of new and expanded historic districts, and the development of design guidelines for single-family and hillside neighborhoods.
- Designation of new park sites and the establishment of community-specific park equivalencies consistent with the General Plan.
- Revisions to the open space boundary in each planning area based upon updated open space mapping to exclude developed areas and identify areas for resource conservation (including a MHPA boundary correction).

EIR Requirements

A. INTRODUCTION

The introductory chapter of the PEIR shall introduce the proposed Community Plan Updates, with a brief discussion on the intended use and purpose of the PEIR. Identify all discretionary actions/permits associated with the Community Plan Updates. The involvement of other local, state, or federal agencies that have responsibility for approvals or project review shall also be described.

B. ENVIRONMENTAL SETTING

The PEIR shall describe the precise location of each community and present it on a detailed topographic map and regional map. The PEIR shall provide a local and regional description of the environmental setting for each community, as well as the zoning and land use designations of each community, area topography, drainage characteristics, and vegetation. Identify overlay zones and other planning documents that affect each of the communities, such as Airport Approach, Airport Influence Area, FAA Part 77, Residential Tandem Parking overlay zones, and the City of San Diego Multiple Species Conservation Program (MSCP). If a potential cumulative effect for an impact category is to be discussed in the PEIR, this section shall establish a setting for the discussion by describing the background or general progression of the cumulative pattern as it relates to each of the Community Plan areas, as well as the Community Plan areas considered as a whole. The environmental setting shall include a brief description of police and fire facilities and the emergency response times for each community and the three Community Plan areas when considered as a whole.

C. PROJECT DESCRIPTION

The PEIR shall identify the project objectives and include a detailed and separate project description for each of the Community Plan Updates. Project objectives will be critical in determining appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. A description of each Community Plan Update shall be presented in this section. The project description shall provide a discussion of all discretionary actions required for consideration of the Community Plan Updates by City Council, as well as a discussion of all permits and approvals required by federal, state, and other regulatory agencies.

D. HISTORY OF PROJECT CHANGES

This section of the PEIR shall outline the changes that have been made to each of the Community Plan Updates in response to environmental concerns raised during City review.

E. ENVIRONMENTAL ANALYSIS

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. The PEIR must represent the independent analysis of the City of San Diego as Lead Agency; therefore,

all impact analysis must be based on the City's current "Guidelines for the Determination of Significance". Below are key environmental issue areas that have been identified for discussion in the PEIR, within which the issue statements must be addressed individually. Discussion of each issue statement shall include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis shall address potential direct and indirect impacts that could be created through implementation of the proposed project and its alternatives.

Environmental Issue Areas to be Discussed

LAND USE

- Issue 1: Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans?*
- Issue 2: Would the project conflict with the provision of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?*
- Issue 3: Would the proposal result in the exposure of people to noise levels which exceed the City's Noise Ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?*
- Issue 4: Would the proposed project physically divide an established community?*
- Issue 5: Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?*

The project proposes the update to three community plans located in the central area of the City: Uptown, North Park, and Greater Golden Hill. The Land Use section shall describe land use patterns, the extent of urban development, density and intensity of existing development, and future land use projections based upon the updated Uptown, North Park, and Greater Golden Hill Community Plans. The relationship of the community plans to the General Plan, and other existing and proposed tools for implementing the General Plan policies shall also be addressed. If there are potential inconsistencies of the project with adopted plans, and those inconsistencies would create environmental impacts, this section shall describe whether or not these potential impacts would lead to physical significant effects.

The PEIR shall analyze each of the proposed Community Plan Updates for consistency with all applicable land use and regulatory plans, including, but not limited to the City of San Diego General Plan (2008) and the MSCP Subarea Plan and the SANDAG Sustainable Community Strategy (SCS). The relationship of each Community Plan Update with the City's Multiple Species Conservation Program (MSCP) Subarea Plan shall be discussed, and a determination made relative to the potential that the project could conflict with the MSCP. Each Community Plan Update shall also be evaluated with regards to applicable Airport Influence Area(s) and

associated Airport Land Use Compatibility Plan(s) (ALUCP). The noise environment shall be considered in each community and a determination made relative to whether implementation of the proposed update would result in exposure of people to noise levels that exceed the City's noise standards and noise compatibility guidelines.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

- Issue 1: Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?*
- Issue 2: Would the project result in the creation of a negative aesthetic site or project?*
- Issue 3: Would the project result in substantial alteration to the existing or planned character of the area*
- Issue 5: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).*
- Issue 6: Would the project result in a substantial change in the existing landform?*
- Issue 7: Would the project create substantial light or glare which would adversely affect daytime or nighttime view in the area?*

This section of the PEIR shall address visual quality and aesthetics of the project, as well as potential for impacts on neighborhood character, and include a general description of the built and natural visual resources within the Uptown, North Park, and Greater Golden Hill communities. It shall include a discussion of the potential impact of implementation of the Community Plan Updates to any vistas, scenic resources, or community identification symbols or landmarks from any public viewing areas within each community. This section shall also address the protection of public views, scenic vistas, and landmarks, and neighborhood character, and how each community plan, through the preparation of neighborhood specific design standards and guidelines, addresses these issues.

TRANSPORTATION/CIRCULATION/PARKING

- Issue 1: Would the project result in traffic generation in excess of specific community plan allocation?*
- Issue 2: Would the project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?*

- Issue 3: Would the project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?*
- Issue 4: Would the project result in an increased demand for off-site parking?*
- Issue 5: Would the project affect existing parking?*
- Issue 6: Would the project have a substantial impact upon existing or planned transportation systems?*
- Issue 7: Would the project result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?*
- Issue 8: Would the project conflict with adopted policies, plans or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks)?*

The analysis in this section of the PEIR shall identify potential impacts to the traffic and circulation system. A traffic technical study shall be prepared in accordance with City's Traffic Impact Study and approved by City staff, and included as an appendix to the PEIR.

The traffic study and PEIR shall evaluate the traffic volumes and level of service (LOS) on intersections, roadways, and freeway ramps; include descriptions and applicable graphics of the existing transportation conditions within the project area, and provide a comparative analysis of projected conditions during the horizon year. The conclusions of the traffic study shall be incorporated into this section of the PEIR. Specifically address any proposed alterations to the present circulation element and effects on circulation movements within and between each community. The traffic study and PEIR shall also address consistency with planned alternative transportation systems and related policies, as well as potential hazards to motor vehicles, pedestrians and bicycles, due to the proposed project. Also, address if any proposed land use changes to each Community Plan would result in parking congestion in the community.

AIR QUALITY

- Issue 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?*
- Issue 2: Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?*
- Issue 3: Would the project exposing sensitive receptors to substantial pollutant concentrations?*
- Issue 4: Would the project exceed 100 pounds per day of Particulate Matter (PM)(dust)?*

Issue 5: Would the project result in substantial alteration of air movement in the area of the project?

The PEIR shall describe the region's climate and the San Diego Air Basin's current attainment levels for state and federal ambient air quality standards. An Air Quality Analysis shall be prepared for the project. The results of the Air Quality Analysis shall be presented in this section of the PEIR, and included as an appendix to the PEIR. The air quality study will identify potential stationary sources of air emissions within each of the planning area and shall discuss if implementation of the proposed Community Plan Updates would impact the ability of the San Diego Air Basin to meet regional air quality strategies and the consistency of the project with the California Air Resources Board Air Quality and Land Use Handbook. The significance of potential air quality impacts shall be assessed and control strategies identified. The PEIR shall analyze the Community Plan Updates' compliance with the State Implementation Plan (SIP), the Regional Transportation Plan (RTP) and the Regional Transportation Improvement Plan (RTIP).

The PEIR shall also assess the potential health risks associated with diesel particulate emissions from vehicular traffic on the area freeways, including Interstates 5, 8, 15, and 805, as well as State Routes 94 and 163 adjacent to the planning areas, and shall assess whether the proposed land use plans and policies in the Community Plan Updates would allow for future development which would create a significant adverse effect on air quality that could affect public health. The PEIR shall assess whether project implementation would result in a significant increase in auto and truck emissions due to an overall increase in vehicular trips within each of the communities and the three community plan areas as a whole.

GLOBAL CLIMATE CHANGE

Issue 1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Issue 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The EIR shall provide a description of the existing global context in which climate change impacts are occurring and are expected to occur in the future; a summarization of the relevant state laws that address climate change; a description of relevant statewide and/or regional GHG inventories to which the project would contribute; a quantification of the project's direct and indirect GHG emissions and compare them to baseline conditions; a conversion of the GHG into CO₂ equivalents using an established "carbon calculator"; a discussion of whether the project would enhance or impede the attainment of state GHG reduction targets and its relationship to local plans and policies; a description of the cumulative, global climate change impacts to which the project would contribute; and a description of how the impacts of global climate change could impact the project.

Furthermore, an estimate of the project generated greenhouse gas emissions shall be provided in this section. The projected greenhouse gas emissions with and without the Community Plan

Updates shall be compared and incorporated into a qualitative discussion of the significance of the emissions relative to global climate change. A qualitative discussion of potential adverse effects to the project that may occur because of global climate change shall also be included in this section.

The PEIR shall provide details of community specific policies that pertain to sustainable land use and site planning and sustainable design and building features, and any other policies that meet criteria outlined in the Conservation Element of the General Plan.

ENERGY

Issue 1: Would the construction and operation of the proposal result in the use of excessive amounts of electrical power?

Issue 2: Would the proposal result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?

Appendix F of the State CEQA Guidelines requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy should be included in this section. The EIR section shall address the estimated energy use for the project and assess whether the project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers. A description of any energy and/or water saving project features should also be included in this section. (Cross-reference with GHG Emissions discussion section as appropriate.) Describe any proposed measures included as part of the project or required as mitigation measures directed at conserving energy and reducing energy consumption. Ensure this section addresses all issues described within Appendix F of the CEQA Guidelines.

NOISE

Issue 1: Would the proposal result in or create a significant increase in the existing ambient noise level?

Issue 2: Would the proposal cause exposure of people to future transportation noise levels which exceed standards established in the General Plan?

A Noise Technical Report shall be prepared, which shall consist of a comparison of the change in noise levels projected along affected roadways (as identified in the traffic study) resulting from project implementation. The Noise Technical Report shall be included in the appendices to the PEIR. This analysis and the discussion in the PEIR shall focus on areas that would be subject to potentially significant noise impacts as a result of the proposed Community Plan Updates and shall include discussion of potential measures that could be utilized to reduce vehicular noise levels. The Noise Technical report and PEIR shall also assess potential noise impacts related to aircraft over flight operations for each community.

HISTORICAL RESOURCES

- Issue 1: Could implementation of the proposed project result in adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites?*
- Issue 2: Could implementation of the proposed project result in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries?*
- Issue 3: Could implementation of the proposed project result in the disturbance of any human remains, including those interred outside of formal cemeteries.*

All three communities have played an important role in the City's history and development, and important historical resources remain today in all three communities. A historical resources evaluation shall be prepared for the project to identify potential impacts to historic resources within each community that could occur as a result of the Community Plan Updates. This section of the PEIR shall describe whether or not the implementation of the Community Plan Updates would negatively affect the preservation of archaeological or historical resources within the respective communities and how the proposed project could affect the goals of the Historic Preservation Element.

BIOLOGICAL RESOURCES

- Issue 1: A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?*
- Issue 2: A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?*
- Issue 3: A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?*
- Issue 4: Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?*

- Issue 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?*
- Issue 6: Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects?*
- Issue 7: A conflict with any local policies or ordinances protecting biological resources?*
- Issue 8: An introduction of invasive species of plants into a natural open space area?*

A programmatic level general biological analysis (Biological Resources Technical Report) shall be prepared for the project to include an evaluation of biological resources within each community that could be potential affected by the respective Community Plan Updates. The Biological Resources Technical Report shall be included in the appendices to the PEIR. Existing documents and recent aerial imagery shall be reviewed to document biological resources within the three community plan areas. Sensitive biological resources will be plotted on the base map based on literature review and the types of suitable habitat present in the community planning areas.

The PEIR shall evaluate each of the three proposed community plan updates and identify any potential impacts which could occur with respect to sensitive biological resources from its implementation including direct and indirect impacts, and the proposed revisions to the open space boundary in each planning area based upon updated open space mapping.

Potential indirect impacts to biological resources shall be addressed and appropriate mitigation measures shall be included in this section. The analysis shall identify federal, state, and local ordinances and laws which protect sensitive biological resources (e.g., City MSCP, state NCCP, and state and federal endangered species and wetlands laws). The potential for development pursuant to the proposed Community Plan Updates to conflict with the goals and regulations established by these laws and policies shall also be evaluated.

Also, this section shall discuss how any proposed land use changes associated with the Community Plan Updates would impact the City's biological conservation goals either directly or indirectly, and describe how the Conservation Element included within each Community Plan Update would affect those goals.

GEOLOGIC CONDITIONS

- Issue 1: Would the project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?*
- Issue 2: Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?*

Issue 3: Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The analysis in the PEIR shall be based on a review of available reports and maps and preparation of a geologic map that shows potential geologic hazard areas (faults, landslides) and areas where known adverse soil conditions have been found for each community. This section of the PEIR shall include a summary of the geologic hazards and soil conditions for each of the communities.

The PEIR shall discuss the potential for either short- or long-term erosion impacts to soils on-site. Geological constraints on the project site, including ground shaking, ground failure, landslides, erosion, and geologic instability shall be addressed, as well as seismicity and seismic hazards created by faults present in the project site.

PALEONTOLOGICAL RESOURCES

Issue 1: Would the project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?

Issue 2: Would the project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

The PEIR shall include a paleontological resources discussion that identifies the underlying soils and formations within each community and the likelihood of the project to uncover paleontological resources during grading activities. Standard mitigation measures shall be outlined in the PEIR to ensure that, should important resources be uncovered with implementation of future development projects within the communities, appropriate measures would be required to allow for recovery and curation.

HYDROLOGY/WATER QUALITY

Issue 1: Would the project result in a substantial increase in impervious surfaces and associated increased runoff?

Issue 2: Would the project result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

Issue 3: Would the project result in an increase in pollutant discharge to receiving waters during construction or operation?

Issue 4: Would the project violate any water quality standards or waste discharge requirements?

HYDROLOGY

Hydrology deals with the properties, distribution, and circulation of surface water, ground water, and atmospheric water. The quantity of water which flows in a creek or river is calculated based on historic climatic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are all watershed characteristics that influence the quantity of surface flows. Therefore, as land is developed, impervious area is increased, thereby increasing runoff.

The PEIR shall evaluate if the proposed plan update for each community would have a potential for increasing runoff volumes within affected watersheds. Anticipated changes to existing drainage patterns and runoff volumes for each community shall be addressed in the PEIR. A preliminary hydrology study must be provided and measures to protect on-site and downstream properties from increased erosion or siltation must be identified; this study shall be included in the appendices of the PEIR. The PEIR should address the potential for project implementation to impact the hydrologic conditions within the project area, and downstream.

WATER QUALITY

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed, the impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. Degradation of water quality could impact human health as well as wildlife systems. Sedimentation can cause impediments to stream flow. In addition, oxygen availability is affected by sedimentation, which can significantly influence aquatic and riparian habitats. Therefore, the PEIR shall discuss how the each Community Plan's update could affect water quality within the project area and downstream.

This section shall also identify pollutants of concern for the watershed(s) in which each community is located. Based upon the federal Clean Water Act (CWA) Section 303(d) impaired water listings, this section shall address potential impacts to the beneficial uses, and address if the project would cause impacts to water quality. Conformance with the National Pollutant Discharge Elimination System (NPDES) requirements shall also be discussed.

PUBLIC SERVICES AND FACILITIES

Issue 1: Would the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:

- *Police protection*
- *Parks or other recreational facilities*
- *Fire/Life Safety protection*

- *Libraries*
- *Schools*
- *Maintenance of public facilities, including roads*

The PEIR shall include a discussion of potential impacts to public utilities resulting from implementation of each Community Plan Update. The PEIR shall identify any conflicts with existing infrastructure, evaluate any need for upgrading infrastructure, and shall demonstrate that facilities would have sufficient capacity to serve the needs of the project. This section shall discuss any intensification of land use and land use changes associated with each Community Plan Update to determine if it would increase demand on existing and planned public services and facilities, and identify fire and police facilities in each community. This section will also disclose the Fire and Police Departments' current response time to the area, and discuss if project implementation of the proposed Community Plan Update for each community would alter any existing or planned response times within the project or surrounding service area.

PUBLIC UTILITIES

Issue 1: Would the project result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities:

- *Natural gas*
- *Water*
- *Sewer*
- *Communication systems*
- *Solid waste disposal*
-

Issue 3: Would the project use of excessive amounts of water?

Issue 4: Does the project propose landscaping which is predominantly non-drought resistant vegetation?

The PEIR shall describe measures/policies included within the proposed Community Plan updates that could potentially reduce the use of energy and water. The PEIR will present measures included as part of the policies and/or proposals within each Community Plan Update or proposed as mitigation measures directed at conserving energy and reducing energy consumption consistent. The PEIR shall discuss how the implementation of the Community Plan Updates would affect the City's ability to handle solid waste.

The PEIR shall also provide a discussion of water supply and whether project build-out under each of the proposed Community Plan Updates was considered in the 2005 Urban Water Management Plan; an identification of water usage and customers served in each community, including commercial and residential usage; a determination of the water supply necessary to serve the demand of both short-term and long-term build-out; an identification of reasonably foreseeable short-term and long-term water supply sources, and alternative sources which would include

anticipated dates of previously untapped sources becoming available; an identification of likely yields of future water supply from short-term and long term build-out; consultation with water supply agencies to determine discrepancies between actual ability and projected ability to serve the project; a determination of cumulative demands the project would place on projected water supply; a comparison demand of project build-out with projected water supply from both short-term and long-term water sources and disclose impacts; consultation with water supply agencies to determine discrepancies between actual ability and projected ability to serve the project; a determination of cumulative demands the project would place on projected water supply; and a comparison of demand of project build out with projected water supply from both short-term and long-term water sources with disclosure of deficits.

HEALTH AND SAFETY

- Issue 1: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*
- Issue 2: Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?*
- Issue 3: Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- Issue 4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?*
- Issue 5: Would the 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?*
- Issue 6: Would the project result in a safety hazard for people residing or working in a designated airport influence area?*
- Issue 7: Would the project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan?*

The PEIR shall identify known contamination sites within each of the Community Plan areas and address any potential impacts that identified contamination site could have on land uses of the proposed Community Plan Updates. The PEIR shall also discuss effects on emergency routes and access within each community resulting from the proposed Community Plan Updates. Fire hazards exist where highly flammable vegetation is located in canyon areas located in the community plan update areas. Specialized public safety issues arise in cases where brush

management requirements cannot be met. The PEIR shall discuss the provisions provided in each Community Plan Update in terms of health and safety related to fire hazards in and adjacent to each community. The analysis in this section shall also include a discussion of the City's brush management requirements, as well as any other safety measure(s) proposed as part of the project.

Conduct a research of data bases (such as the State of California Hazardous Waste and Substances Sites List and Environfacts) to determine if hazardous materials, toxic substances, and/or toxic soils are known to occur in the communities. Graphics will be used to identify the location of any potential hazardous materials and sources. Additionally, evaluate potential issues associated with proximity to any areas identified as Prime Industrial Lands in the City's General Plan. If potential impacts are identified, a mitigation strategy shall be proposed.

F. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This section shall describe the significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

G. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In conformance with CEQA Section 15126.2(b) and (c), the PEIR must include a discussion on any significant irreversible environmental changes which could be caused by the project should it be implemented. The PEIR shall address the use of nonrenewable resources during the construction and life of the project.

H. GROWTH INDUCEMENT

Consistent with CEQA Guidelines Section 15126.2, the PEIR shall address the potential for growth inducement resulting from implementation of the proposed project. The PEIR shall discuss the ways in which the proposed project could foster economic or population growth, or construction of additional housing either directly or indirectly. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment.

This section shall address ways in which the proposed Community Plan Updates could foster economic or population growth, or construction of additional housing, either directly or indirectly as a result of implementation of the Community Plan Updates. Additionally, this section shall discuss if the project would result in accelerated growth that may further strain existing community facilities or encourage activities that could significantly affect the environment. The consequences of growth shall be evaluated, as well as the potential for impacts to occur in surrounding areas as a result of project implementation.

I. CUMULATIVE IMPACTS

When the proposed project is considered with other past, present, and reasonably foreseeable projects in the project area, implementation could result in significant environmental changes that are individually limited but *cumulatively considerable*. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts shall be discussed in a separate section of the EIR. The PEIR shall summarize the overall short-term and long-term impacts the proposed project could have in relation to other planned and proposed projects in the project area.

J. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the PEIR shall include a brief discussion of why certain areas were not considered to be potentially significant and were therefore not included in the PEIR. For the Uptown, North Park Greater Golden Hill Community Plan Updates Project, these include agricultural and forestry resources and mineral resources. It is possible that other issue areas will be included in this section based upon the results of technical analyses not completed as of the publication of the NOP. Additionally, as supplementary information is submitted, the PEIR may need to be expanded to include additional areas. Consultation with EAS is recommended to determine if subsequent issue area discussions need to be added to the PEIR. The justification for these findings will be summarized in the PEIR.

K. ALTERNATIVES

In accordance with CEQA Guidelines Section 15126.6, the EIR shall focus on reasonable alternatives that avoid or reduce the project's significant environmental impacts. These alternatives shall be identified and discussed in detail, and shall address all significant impacts.

The alternatives analysis shall be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis shall be a section entitled "Alternatives Considered but Rejected." This section shall include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection shall be explained.

No Project Alternative

The No Project Alternative discussion shall compare the environmental effects of approving the project with impacts of not approving the project. In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative shall discuss the existing conditions at the time of the NOP, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project is not approved, based on current zoning, land use designations, and available infrastructure. The No Project/Development under Existing Community Plans alternative assumes no updates to the existing community plans, with future development occurring consistent with these existing plans. The intent of this alternative is to satisfy CEQA's requirement to address development of the project in accordance with any approved plans or existing zoning.

Other Project Alternatives

In addition to a No Project Alternative, the PEIR shall consider other alternatives that are determined through the environmental review process that would mitigate potentially significant environmental impacts. These alternatives must be discussed with EAS staff prior to including them in the PEIR.

The Alternatives section of the PEIR will be based on a description of “reasonable” project alternatives, defined in consultation with City staff consistent with CEQA, which reduce or avoid potentially significant impacts associated with the proposed project. Site-specific alternatives, if needed, will be developed in response to the findings of the environmental analyses and the various technical studies and may include alternative project design to mitigate one or more of the identified significant adverse impacts of the proposed project. This may include a reduction in land use intensity, alternative land use plan(s) or feasible design scenarios.

Land use plan(s) and/or concepts that were identified and rejected for detailed evaluation in the PEIR will be presented, with a clear reason as to why those alternatives are not being considered in the PEIR. The advantages and disadvantages of each alternative will be compared to the proposed project and reasons for rejecting or recommending the alternative will be discussed in the PEIR.

L. MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

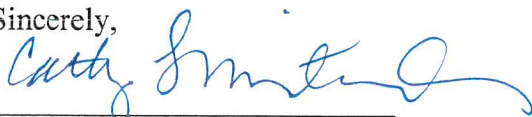
For each of the issue areas discussed above, mitigation measures shall be clearly identified, discussed, and their effectiveness assessed in each issue section of the EIR. A Mitigation Monitoring and Reporting Program (MMRP) for each mitigation measure must be included. At a minimum, the program should identify: 1) the city department or other entity responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. The separate MMRP should also be contained (verbatim) as a separate section, which will be attached to the EIR.

M. OTHER

The EIR shall include the references, individuals and agencies consulted, and certification page.

If you have any questions or need clarification regarding any of the information contained in the scoping letter, please contact Anna McPherson at (619) 466- 446-5276 or e-mail at amcpherson@sandiego.gov.

Sincerely,



Cathy Winterrowd, Deputy Director
Planning, Neighborhoods, and Economic Development Department



Edmund G. Brown Jr.
Governor

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



Ken Alex
Director

Notice of Preparation

December 23, 2013

To: Reviewing Agencies

Re: Community Plan Update for the Uptown-North Park-Greater Golden Hill Community Plan Areas
SCH# 2013121076

Attached for your review and comment is the Notice of Preparation (NOP) for the Community Plan Update for the Uptown-North Park-Greater Golden Hill Community Plan Areas draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Anna L. McPherson
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 2013121076
Project Title Community Plan Update for the Uptown-North Park-Greater Golden Hill Community Plan Areas
Lead Agency San Diego, City of

Type **NOP** Notice of Preparation

Description -Three comprehensive community plan update to be consistent with and to incorporate relevant policies from the 2008 City of San Diego General Plan;
 -Amendment to the 2008 General Plan to incorporate the updated community plans as components of the Land Use Element;
 -Implementation Program to include the application of citywide zoning pursuant to the City of San Diego Land Development Code (LDC) and community-specific tailored zoning similar to the existing adopted Planned District Ordinances (PDOs). It is anticipated that the community-specific tailored zoning will occur through a Community Plan Implementation Overlay Zone (CPIOZ). The Implementation Program may change land uses and development standards within existing zone districts or within specific sites or areas within each community; and
 -Comprehensive updates to the three existing Public Facilities Financing Plans.

Lead Agency Contact

Name Anna L. McPherson
Agency City of San Diego
Phone 619 446 5276 **Fax**
email
Address 1222 First Avenue, MS-501
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City San Diego
Region
Cross Streets Various
Lat / Long
Parcel No. various

Township	Range	Section	Base
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Proximity to:

Highways I-805, 15, 5, 8; SR 163, 94
Airports San Diego Int'l
Railways San Diego Trolley
Waterways
Schools various
Land Use The three existing community plans include a full range of land uses and zoning.

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

Reviewing Agencies Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Office of Emergency Management Agency, California; Native American Heritage Commission; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9

Date Received 12/23/2013 **Start of Review** 12/23/2013 **End of Review** 01/21/2014

NOP Distribution List

SK

County: SAN DIEGO

SCH#

2013121076

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Nicole Wong
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Tamyra Trujillo
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources Resources Agency
Nadell Gayou

Fish and Game

- Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Donald Koch

- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Charles Armor
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Gabrina Gatchel
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Depart. of General Services
Public School Construction
- Dept. of General Services
Anna Garbeff
Environmental Services Section
- Dept. of Public Health
Jeffery Worth
Dept. of Health/Drinking Water
- Delta Stewardship Council
Kevan Samsam

Independent

Commissions, Boards

- Delta Protection Commission
Michael Machado
- Cal EMA (Emergency Management Agency)
Dennis Castrillo

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Leo Wong
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- Housing & Community Development
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Gary Arnold
- Caltrans, District 4
Erik Alm
- Caltrans, District 5
David Murray
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- All Projects
CEQA Coordinator
- Transportation Projects
Jon Taylor
- Industrial Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)

- Other _____
- _____
- _____
- _____
Conservancy

Comments on the Proposed Uptown North Park Greater Golden Hill Communities Project

Your Name Cheryl Brierton
Organization _____
Address 1329 Bancroft St
City San Diego State CA Zip 92102
Email cwbrierton@aol.com

- Comment:** ① Canyons / Open Space need protection ~~from~~ development for plants, birds + animals, as well as watersheds. This includes adjacent undeveloped land + hillsides.
- ② Wells should not be placed where they intrude on canyons / open space.
- ③ Views are a key asset of our community + should be protected.
- ④ There are many high risk fire areas in Greater Golden Hill. Development must assure all fire risk protections are considered, including adequate access for fire engines + low-risk construction/landscaping.
- ⑤ Traffic in certain parts of Golden Hill is excessive, + parking is severely impacted. Density should be reduced in the 3 small areas identified by the Greater Golden Hill Community Planning Committee. Parking issues should be addressed for all new development.
- ⑥ Walkability and small scales should be respected as part of community character. A key is a sidewalk/bike lanes through the Golf Course + down 26th Street.
- ⑦ Noise from aircraft + adjacent freeways, as well as pollution to schools such as Golden Hill Elementary, should be included.
- ⑧ High rises are inconsistent with neighborhood character + with historic 50-ft frontages/residential diversity. Also, increased density should not be permitted without adequate infrastructure.

Attn: Anna L. McPherson, AICP
Senior Planner
City of San Diego
Environmental Analysis Section
Development Services Department
1220 First Avenue, MS-501
San Diego, CA 92101
amcpherson@sandiego.gov

Comments on the Proposed Uptown North Park Greater Golden Hill Communities Project

Your Name ERNESTINE G. BONN
Organization UHCDC
Address 4452 Park Blvd., #104
City SAN DIEGO State CA Zip 92116
Email UHCDC@NPS2SRD.NET

Comment: The project is incomplete and premature due to insufficient data including completed updated maps - (last map for uptown was dated 2011) and critical Traffic Statistics, ^{neighborhood character} historic preservation data which are important in analyzing infill impacts. STATE 111 requires a Biennial ^{update} update. There has not been an updated Congestion Management Program Draft since 2008 and many intersections & connects to our primary Hwy (163, 8) showed an LOS of "F" meaning serious deficiencies. Impacts from increased development in Mission Valley are having serious impacts on ingress & egress from both North Park, University Heights & Uptown.

Attach additional sheets if necessary. Written comments **do not** need to use this form. It is optional.

Comments may be submitted in person at the public scoping meeting or mailed/mailed to:

Serious deficiency in infrastructure that has not been implemented since last plan adoptions 1986 NP / 1988 Uptown.
Water supply inadequacy.
Sensitive to built environment within historic ^{potentially} areas in NP / University HTS & Uptown.
Utility boxes undergrounding

Attn: Anna L. McPherson, AICP
Senior Planner
City of San Diego
Environmental Analysis Section
Development Services Department
1220 First Avenue, MS-501
San Diego, CA 92101
amcpherson@sandiego.gov



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)
PUBLIC SCOPING MEETING

This meeting is held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed environmental document for the project action to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project North Park Plan Update **Date** 1-9-14

Comments

- Utilize a range of thresholds for traffic impacts of creating complete streets, and do not rely on LOS only. Agencies can choose their thresholds, so do not use the State's progress as an excuse to not apply other performance / impact measures.
- Fully study impacts to infrastructure from infill / density increases, including impacts to drainage, water and sewer. Some of these pipelines are more than 100 years old.
- Address compatibility of adjacent land uses.
- Consider impacts of shadowing allowed by increased heights. Also consider potential reduction of feasibility of roof top ~~solar~~ solar by increased building heights. →

Name Katherine Hon **Signature** Katherine Hon
Address 2226 Dwight St.
San Diego, CA 92104



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)
PUBLIC SCOPING MEETING

This meeting is held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed environmental document for the project action to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project Golden Hill CAP Date 1/9/14

Comments Many areas are congested with cars. As development proceeds, it's important to require enough off-street parking so that residents can park near their homes. The idea that properties developed near bus lines require fewer off-street spots because residents will use only buses is a myth. They may use buses sometimes, but you can bet that most of them will use cars as well.

Name John Kroll Signature John Kroll

Address 2029 Granada Ave 92104

Use back of sheet if additional space is necessary.

Comments on the Proposed Uptown North Park Greater Golden Hill Communities Project

Your Name Cheryl Brierton
Organization Greater Golden Hill Community Planning Committee (GGHPC)
Address Golf Course Drive / Clubhouse - 1/2 Ruchell Alvarez, Chair
City San Diego State CA Zip 92102
Email _____

Comment: GGHPC prepared extensive comments in each of the noticed areas identified in the noticed "General Project Description" & "Detailed Project Components." These comments are in our e-mail submission. Please review & include them in this transcript for today's hearing.
(Note: the notice of this hearing was mailed 23 Dec 2013. Our next meeting was yesterday. We would not have had sufficient time to provide input in normal circumstances. However, City Planner Bernie Turgeon provided a draft in October. GGHPC was able to provide comments in November, & approve its minutes for that meeting yesterday.)

Attach additional sheets if necessary. Written comments **do not** need to use this form. It is optional.

Comments may be submitted in person at the public scoping meeting or mailed/emailed to:

Attn: Anna L. McPherson, AICP
Senior Planner
City of San Diego
Environmental Analysis Section
Development Services Department
1220 First Avenue, MS-501
San Diego, CA 92101
amcpherson@sandiego.gov

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



December 26, 2013

Ms. Anna L. McPherson, Environmental Planner

City of San Diego Development Services Department

1222 First Avenue, MS-501
San Diego, CA 92101

RE: SCH#2013121076; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **"Community Plan Update for the Uptown-North Park-Greater Golden Hill Community Plan Area Project;"** located in the City of San Diego; San Diego County, California

Dear Ms. McPherson:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document. This project may also be subject to California Government Code Section 65040.2 (SB 18).

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine if a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s). The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies" and Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

Happy Holidays!

**Native American Contacts
San Diego County California
December 26, 2013**

Barona Group of the Capitan Grande
Clifford LaChappa, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013121076; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Community Plan Update for the Uptown-North Park-Greater Golden Hill Community Plan area; City of San Diego; San Diego County, California.

Native American Contacts
San Diego County California
December 26, 2013

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul , CA 91935
jamulrez@sctdv.net
(619) 669-4785
(619) 669-48178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
Santa Ysabel, CA 92070
mesagrandeband@msn.com
(760) 782-3818
(760) 782-9092 Fax

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Kwaaymii Laguna Band of Mission Indians
Carmen Lucas
P.O. Box 775 Diegueno -
Pine Valley , CA 91962
(619) 709-4207

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315 - voice
(619) 445-9126 - fax

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd. Diegueno
Escondido , CA 92025
(760) 737-7628
(760) 747-8568 Fax

Ipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694
cjlinton73@aol.com

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**Native American Contacts
San Diego County California
December 26, 2013**

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon , CA 91919
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator; Viejas THPO
240 Brown Road Diegueno/Kumeyaay
Alpine , CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 478-2113
(KCRC is a Coalituon of 12
Kumeyaay Governments)
bp@lapostatribe.com

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Date: March 19, 2014

From: Vicki Granowitz Chair North Park Planning Committee (NPPC)

To: Anna McPherson City of San Diego DSD Environmental Planner

RE: Preparation of a Program Environmental Impact Report (PEIR), Scoping Meeting on January 9, 2014. The City notice stated that the proposed Community Plan Update may result in potentially significant impacts to: Land Use, Visual Quality and Neighborhood Character, Transportation/Circulation/Parking, Air Quality, Global Climate Change, Noise, Historical Resources, Biological Resources, Geologic Conditions, Paleontological Resources, Hydrology/Water Quality, Public Services, Public Utilities, and Health and Safety (Anna McPherson City SD DSD Environmental Planner. Reported there is no problem if we get our comments in by the 3rd week in March, she requested Items be limited to CEQA Issues).

On March 18, 2014 the North Park Planning Committee Voted Unanimously to Submit the Following Comments to the City of San Diego DSD Environmental Services for Analysis in the NPCPU EIR (Carlson/Barry 10/0/0)

1. NPPC feels that a Program EIR does not accurately capture the potentially significant environmental impacts associated with a community plan update. A Master EIR is more appropriate for the environmental review than a Program EIR for the specificity required in a community plan.
2. NPPC requests a review of potentially significant direct and cumulative impacts to transit corridors due to traffic diversion on adjacent streets, due to traffic calming measures and increases of traffic due to potential increases in density and intensity of uses.
3. Because Traffic Level of Service analysis is deficient for analyzing the potentially significant impacts of alternative transportation modes, please incorporate the new California Statutes for transportation planning for circulation impacts assessment in order to fully capture the future transportation elements in North Park.
4. Potentially significant environmental impacts due to light pollution have not been addressed in any of the community plan elements. Please evaluate and discuss light pollution in the noise element and rename the element Noise and Light Pollution Element.
5. It is NPPC's intention to provide the strongest possible protections for historic resources in our updated community plan. Potentially significant Direct and Cumulative environmental impacts to the built environment should be assessed, evaluated and discussed where neighborhood character and potentially historic resources are at risk.
6. Evaluate and discuss potentially significant direct and cumulative impacts to the public right-of-way due to further intrusion of utility appurtenances, driven by the greater demand for services caused by increased density and intensity of use. Potentially Significant impacts may be incurred to ADA issues, quality of life, walkability, mobility, parking, as well as business and economic impacts.
7. Transition Zones: Evaluate and discuss potentially significant direct and cumulative environmental impacts due to potential increases in commercial uses, and potential increases in intensity of uses adjacent to residential zones. Potential Direct and Cumulative Impacts to be evaluated and discussed include:
 - Noise impacts (e.g. from restaurants/bars/traffic etc.),
 - Impacts from lighting (e.g. impacts to "dark sky", impacts to residential privacy from intrusion of commercial lighting, etc.),
 - Impacts to natural light (e.g. from shadows from taller buildings blocking light to less tall structures, particularly single family and historic buildings, shadowing of gardens impacting vegetable growing space, solar panels, etc.),
 - Impacts to single family residential Parking (e.g. from multi-family housing infill or increased commercial uses) in the transition zones

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110-2714
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



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January 21, 2014

11-SD-VAR
PM VAR
Uptown-North Park-Greater Golden Hill CPU
NOP / SCH 2013121076

Ms. Anna McPherson
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. McPherson:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Uptown-North Park-Greater Golden Hill Community Plan Update (CPU). Caltrans would like to submit the following comments:

- The City should cooperate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, including identifying improvement projects for the corresponding community financing plan(s), as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on/off ramps is adequate.
- Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled (VMT) and the number of trips per household. Therefore, Caltrans encourages local agencies as part of their Community Plan updates to work towards a safe, functional, interconnected, multi-modal system integrated with land use planning that supports the concept of a local circulation system which is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. Transit accommodations can be accomplished through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements which can improve mobility and alleviate traffic impacts to the State facilities that serves the community planning areas: Interstate 5 (I-5), Interstate 805 (I-805), State Route 15 (SR-15), State Route 94 (SR-94), and State Route 163 (SR-163). Such proposed accommodations in Caltrans right-of-way (R/W) should be coordinated early with Caltrans staff; contact Chris Schmidt, Caltrans Transportation Planning, Public Transportation Branch (619-220-7360).
- **SR-94 Express Lanes Project:** This project proposes to construct Express Lanes along SR-94, one in each direction, from east of I-5 to I-805 with a direct connector at I-805. The Express Lanes will carry high occupancy vehicles (HOV) and Bus Rapid Transit (BRT).

This is included as part of the 2050 RTP developed by the San Diego Association of Governments (SANDAG). A draft environmental document for the project is expected to be released to the public in late 2014.

- **Uptown Mystic Park Concept:** On March 7, 2013, Caltrans sent a comment letter to the City regarding a conceptual plan for the Uptown Park project located near SR-163. Please note that the park as proposed then would impact the designated “Cabrillo Freeway Historic District”; further coordination is necessary if the concept moves forward.
- **I-8 Corridor Study:** Please note that SANDAG, in coordination with Caltrans, is currently administering the Interstate 8 (I-8) Corridor Study, which will assess a set of identified operational improvements along I-8 between Sunset Cliffs Boulevard and College Avenue, north of the area for this Community Plan Update. Operational improvements include, but are not limited to, interchange and ramp modifications. The study will be completed by June 2015.
- **SANDAG 2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS):** The Revenue Constrained Highway Network in the adopted 2050 RTP/SCS includes:
 - operational improvements on I-5, between SR-15 and I-8;
 - adding two Managed Lanes on SR-15, between SR-94 and I-805;
 - adding two Managed Lanes on SR-94, between I-5 and State Route 125 (SR-125);
and
 - adding four Managed Lanes on I-805, between SR-905 and Carroll Canyon Road.
- **The California Complete Streets Act of 2008:** Beginning January 1, 2011, Assembly Bill 1358 requires that any substantive revision of the circulation element of the general plan includes planning for a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways in a manner that is suitable to the context of the general plan. The Act defines all users as motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. Caltrans supports Complete Streets policies and continues to implement our own Complete Streets directive, DD-64-R1.
- **Traffic Impact Study:** A traffic impact study is necessary to determine this proposed plan’s near-term and long-term impacts to State facilities – existing and proposed – and to propose appropriate mitigation measures. The study should use as a guideline the Caltrans Guide for the Preparation of Traffic Impact Studies (TIS Guide), which is located at the following website:
<http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf>.
Minimum contents of the traffic impact study are listed in Appendix “A” of the TIS Guide.

The Level of Service (LOS) for operating State highway facilities is based upon Measures of Effectiveness (MOE) identified in the Highway Capacity Manual (HCM). Caltrans endeavors to maintain a target LOS at the transition between LOS “C” and LOS “D” on State highway facilities; however, Caltrans acknowledges that this may not always be feasible and

recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than this target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D". For undeveloped or not densely developed locations, the goal may be to achieve LOS "C".

The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

All freeway entrance and exit ramps where future traffic will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study. For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

Caltrans endeavors that any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable LOS. Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

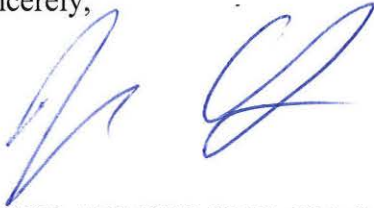
- **Encroachment Permit:** Any work performed within Caltrans R/W will require discretionary review and approval by the Department.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at 619-688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

Ms. Anne McPherson
January 21, 2014
Page 4

Caltrans looks forward to continuing coordination with City staff on this Community Plan Update; please include Caltrans in future notifications for related public meetings and workshops. If you have any questions, please contact Connery Cepeda, Community Planning Liaison, at 619-688-6003 or connery.cepeda@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Armstrong', written over a faint circular stamp.

JACOB ARMSTRONG, Chief
Development Review Branch

c: State Clearinghouse

From: McPherson, Anna
Sent: Tuesday, February 04, 2014 11:57 AM
To: McPherson, Anna
Subject: FW: Comments From Greater Golden Hill Planning Committee

From: Ruchell Alvarez [<mailto:goldenhillplanningcommittee@gmail.com>]
Sent: Thursday, January 09, 2014 3:50 PM
To: DSD EAS
Subject: Comments From Greater Golden Hill Planning Committee

Comments for the January 9th Environmental Impact Report Scoping Meeting:

Greater Golden Hill, Community Plan Update Draft Committee Comments – Summary Document

Section 1.0: Introduction: Brierton, Swarens, and Davis Identify and plan for Very High Fire Sensitivity Zones (maps available at <http://www.sandiego.gov/fire/services/brush/severityzones.shtml>), portions of South Park are included within the zone: The plan should limit dense construction in these areas, ensuring that new construction has fire truck turn around access as required by code, requiring fire safe zones in areas that connect habitable structures to open brush. Additionally, the plan should acknowledge Very High Fire Sensitivity Zones not only in the introduction, but in Section 6 "Public Facilities, Services & Safety Element" and throughout the plan as a whole.

The plan should recognize that the 32nd and 34th Street Canyons are protected by Fish and Game (code section 2831 and City Council Resolution R-30253 [in 2007] as designated open space and habitat protected areas). (Page 9 of the draft erroneously states that the 32nd Street Canyon is not within Multiple Species Conservation.) This should also be reflected in the Recreation Element, 7.4, "Open Space Lands", page 18.

The General Plan Guiding Principles on page 3 of the draft should restate the following items from the prior plan:

- PRESERVE VIEW CORRIDORS (see page 37 of 1988 Plan)
- PRESERVE SINGLE FAMILY AND LOW DENSITY AREAS. The introduction of the prior plan specified different types of architecture In Greater Golden Hill & referenced "sensitivity to older established character, scale, design & topological features."
- PRESERVE COMMUNITY CHARACTER PRESERVE LANDSCAPE/STREETSCAPE
Some important information in the prior plan has been edited out. For example:
- The introduction to the prior plan included acreage, number of residents & number of dwelling units on #acres, & other land uses in the community.

- It also noted our excellent access to transportation systems. The issue of transportation access should be highlighted, based on our community's concern about too much traffic for the infrastructure in specified areas (as submitted to the City Planning Committee), the proposed elevated lane on Highway 94, and the proposed closure of certain freeway exits/on-ramps in our community. This is germane to the "City of Villages" strategy; particularly since page 10 of the draft states mixed use on 30th & Broadway is desirable...recall that GGHPC was divided on that issue, but the majority did not think that area was desirable for mixed-use commercial due to traffic issues (including the adjacent ramp closure).
- The historical connection to Spreckles in the introduction to the prior plan is worthy of continued inclusion.
- On page 7 of the draft, Overall community goals: the new plan should add, PRESERVING VIEW CORRIDORS
- On page 7 of the draft, General Plan Guiding Principles should include: PRESERVE AND PROTECT OPEN SPACE CANYONS, CANYON HABITATS, and HILLSIDES. The hillside and open space evaluation models on pages 163, 165, & 166 of the prior community plan should be reincorporated into this plan. Hillside review should apply to all open space canyon rim development, given the new laws passed to protect designated canyons.

Re "City of Villages Strategy": Language should point out affirmatively that the historic streetcar suburbs have naturally evolved successful, community serving, activity nodes, as well as a variety of housing types/opportunities, and connectivity with adjacent communities such as Center City and North Park.

It is the generally "newer" parts of the community, developed during the "auto era" which suffers issues of connectivity, walkability, transit, services, etc. When these areas were built it was assumed that one would get in one's car and go to work, shop, etc.

Page 5: Paragraph 2: "built to capacity by 1930" In many ways this is in fact true.

Section 1.2: "Historic characteristics ...encourage development and redevelopment..." This treats "Golden Hill" like the "Goose which lays the golden egg" and puts our collective necks on the block. The plan goal has often been stated to conserve and enhance these features, rather than as seems to be suggested here, replace them because they are so well regarded.

Page 7: "Preserving historically and architecturally significant..., in districts and individually" Again, the restated goal has been to preserve and enhance these character defining features throughout the community; to this end one of the charrette findings was the recommendation to establish a "conservation zone" for the entire community plan area, to preserve these elements where historic designation might not be the appropriate tool.

Page 9: Paragraph 4: "Environmental review policies designed to avoid impacts..." To implement this goal, land use recommendations, especially in proposed historic districts, should be consistent with the goal to preserve and enhance character defining elements which would be considered significant under CEQA.

Identify sub-areas with Greater Golden Hill. Reference the sub-areas consistently throughout the plan.

Additional Comments at Meeting

1. Create a cohesive voice throughout document
2. Heavy editing is necessary to provide clarity
3. Tighter stronger language and policies throughout
4. Put community “vision” in perspective
5. Clarify “City of Villages”

Section 2.0: Land Use Element: Kroll, Brierton, Swarens, Davis, and Alvarez

Pertaining to Commercial Development, the Draft Plan inadequately addresses strip malls in the area. On the whole, strip malls should not be permitted in the plan moving forward. One primary issue is parking – if strip malls are allowed to continue, parking should only be permissible at the rear of the business. Further, any reconstruction and/or rebuilding of existing strip malls should trigger a retooling of their parking areas to the rear of the business. Additionally, the same parking requirements should apply not only to strip malls but also include singular businesses (for example: including – but not limited to: Millers Market, Food Bowl, Liquor Store at 30th& Grape, and Liquor Store at 30th & Juniper). Reconstruction and/or rebuilding of such existing businesses should also trigger a retooling of their parking areas to the rear. On upgrading store fronts, store fronts should face directly towards sidewalk areas.

The draft plan includes a photo of the signage at Jericho’s market – although this particular sign is grandfathered in, it does not meet current code compliance requirements and/or standards – thus it should not be used to depict an area standard.

On page 9 of the draft, section 2.2-19 should be changed. There should be no development allowed for parcels within designated Open Space. Similarly, the "Public Facilities, Services & Safety Element" of the Plan (Page 4 & 6 of draft, section 6.1-8) should address that replacement of the aging sewer infrastructure and development of a groundwater pumping facility adjacent to the 32nd Street Canyon in the 32nd Street Canyon must be subject to a CEQA review to determine the least intrusive possible approach to sensitive lands, habitat, and species. (See also, "Canyon Sewer Program" in "Conservation Element", page 9-10.)

Page 1, "Goals": "Historic character and scale retained within single family and low density neighborhoods..." This conflicts with stated goal of protecting character throughout the community, which has been a finding of every forum, meeting, charrette, etc., and a stated goal of the GGHCPG.

Page 5: 2.2-5: "...provide design guidelines...to single family neighborhoods..." see comment above; this is inconsistent with stated goals of the Plan update.

Page 6: Please note that significant employment opportunities should not be anticipated, nor would they be desired, generally within the residential community and community serving businesses; adjacent, transit linked Center City, Port area, etc., are, and should be, the focus for employment-centric land uses.

Paragraph 3: "...existing single family and duplex homes...." Add "bungalow courts, and early apartment buildings..."

Page 10: Does not seem to include existing successful nodes, such as 30th and Beech. Later, in Urban Design element, 30th & Beech does show up as a "Village" target.

The community's right to define for itself what "village" should be preserved, per the General Plan, this seems to get lost, and become just an excuse for "urban renewal".

2.1.1: What does it mean to say "decisions...should be inclusive of social equity and environmental justice considerations."?

21.1: (2nd one, same number of Page 4) I like the public health comment about noise and air pollution but needs to be discussed further.

Page 7: Delevan Street conversion to Residential supported by GGHPC. Plan written to support continued industrial uses and cites "adverse environmental effects from the adjacent freeway".

Page 10: Discussion of Neighborhood Centers doesn't mention 28th St Commercial or Beech Street. Other elements refer to these commercial areas.

Page 11 2.2-27: What does "restrict building intensities under the approach path to Lindbergh" mean?

Introduction: How is "appropriate distribution" defined, qualified, or implemented?

Commercial & Employment: The plan only specifies alcohol – include noise, lighting, or any other aggravator deemed unwanted/excessive to nearby residents.

Additional Comments at Meeting

1. Emphasize community character
2. Clearly identify "Villages"

Public Comment

Ben Anderson: Concerned about down zoning – His property is at C & 32nd - Will bring a conceptual plan in January or February to planning committee.

Section 3.0 Mobility Element: Swarens & Baldwin

Page 2: "considerations" -Sidewalks often lack width for multiple..."

Page 3: "encroachments..." As noted in the preface to this section, the basic infrastructure design is a "mobility asset"; it should not be targeted as a problem. It is also a character defining feature which may be considered significant under CEQA. Where this network has been compromised in various ways, these problems should be solved, rather than treating the "asset" as the problem. The plan discusses transit improvements and walkability in general terms. However, the plan suggests no immediate concrete ideas for how this would occur.

Additional Comments at Meeting

1. Add to this section- 7.1.8--This element should highlight the importance of a safe, multimodal sidewalk connecting the Recreation Center and 28th Street along Golf Course Drive, plus a sidewalk along 26th Street for safe access to Balboa Park.
2. Focus on accessibility to pedestrians and autos
3. Add street lighting into element

Section 4.0 Urban Design Element: Swarens

Page 5: Indicates 30th & Beech as a "Village" target; this does not seem to be consistent with the mapping in the Land Use element, page 10. Please see comments in section 2.0.

Page 12: section 4.2 P-UD-13: "Support construction of accessory units in low density residential neighborhoods" I believe we should discuss this recommendation further, and not base our recommendations on anecdotal data. This effectively doubles the density, and while it may enhance profit it may also greatly diminish value. This increase in density should be at least "discretionary" in the plan update, and clarified further as to what areas it would be applied.

4.3: P-UD-27 & P-UD-28: "continuous storefront" "built to the sidewalk" This would destroy the variety and texture the plan says its goal is to protect, and treats this very successful community as a "blank slate." It also threatens historic and potentially historic resources by encouraging their alteration or removal.

4.4: "traffic circles are appropriate for Golden Hill because they... are easy to implement" That is not sound reasoning; they may or may not be "appropriate", but their "ease" is no support of that.

P-UD-44: Pop outs should not be encouraged in areas identified as "historic" as infrastructure is a character defining feature of the fabric of these areas.

Section 4.5: Page 15: indicates the more appropriate answer to these issues, keeping the corner radius tight. Keeping street corners clear of a clutter, restrictions, and obstructions also promotes the stated goals, and should be included as a recommendation.

P-UD-39: Add sections

- Encouraging planting of street trees (consistent with later elements)
- Develop a historic tree palette, for historic districts and areas.

These are as important Urban Design/streetscape elements as they are for Conservation, etc, and the Plan should include them here (also).

P-UD-46: Please reference link with "Sherman Heights Revitalization Action Plan" design program. This is a City of San Diego policy document, and while this part of 25th street is not in the Plan boundaries, neither is the bay. Streetscape, especially trees and lighting, in this program were designed to coordinate with north of 94 efforts.

Gateways: P-UD-69: With some notable exceptions, are generally, and appropriately, used in primarily commercial areas. Use in GH should generally be encouraged in those areas only. Suggested new recommendation- Encourage the reconstruction of the documented historic gateways at 28th and Ash, and other locations they can be documented to have been; these stone pillars with lighting are associated with the early development of the South Park area, and their return would enhance the historic identity of that community.

4.8: P-UD-72: Please add to text "designers" to enhance the pool of "artists", as architects and other designers may be the "artists" best suited to any particular project.

Additional Comments at Meeting

1. Emphasize community character

Section 5.0 Economic Prosperity Element: Swarens

Page 2: 5.1.2: Add "...while maintaining the vibrant diversity of uses which characterize these corridors".

Section 6.0 Public Facilities, Services, and Safety Element: Swarens

Page 3: Paragraph 3: "Central Area Police substation is in..." Southeastern San Diego (Logan Heights/Sherman Heights) rather than in "Centre City", as stated.

Page 6: 6.1-9: (Re. undergrounding) add: provide oversight to insure preservation of aesthetics in replacement and repair of impacted infrastructure, especially on historic properties, and historic public improvements (e.g. sidewalks, curbs, hardscape, etc.)

Section 7.0 Recreation Element: Brierton, Swarens, Burkart, & Baldwin

7.1.8--This element should highlight the importance of a safe, multimodal sidewalk connecting the Recreation Center and 28th Street along Golf Course Drive, plus a sidewalk along 26th Street for safe access to Balboa Park.

Page 16: Goals: "...mature trees...representing the Victorian era" should be corrected to reflect the reality of the horticultural heritage of the park. "...reflecting the 19th and 20th century..." "Representing the late Victorian and early 20th century..." or something similar.

Section 7: Page 7 & 12 [Table RE 7-1] - does not represent committee site ranking made at the June 26th, 2013 meeting. The following sites were ranked high by the committee:

- Site 1 – Pocket park along F St.
 - Site 2 – SR94 freeway cap and park
 - Site 5c – “Ring of Green” that borders the I-5 at 19th St. from Broadway to E St
 - Site 6 - Community Garden in Balboa Park adjoining Russ Blvd. between 24th and 25th streets.
 - Site 9 - Seven lots along 32nd St. between Broadway and C and along Broadway from C St. east towards 32nd St totaling 3,81 acres and privately owned
 - Site 13 - Parcels adjacent to 29th St. between B and C streets, an area of 1.59 acres
- Include calculations of residents and amount of park space. Highlighting this disparity in the plan ensures that should money become available these projects become more likely.

Additional Comments at Meeting

1. Focus and emphasize on park deficiencies within the community

Section 8.0 Conservation Element: Brierton & Swarens

Add "Identification & protection of species (animals, birds, plants)" policy (pg.1)

Page 4: 8.1.1: The subject of "repositioned" needs to be addressed with more attention. The concept should definitely not be co-equal in the stated goal. Please reference "Secretary of Interior Standards" ("The Standards") and local policies and ordinances (which incorporate the Standards). The "Landmark" significance of resources is most often tied to site, and relocation is addressed under specific criteria in the Standards.

8.1.9: Add - develop survey and research based Historic (street tree) palette for Historic Districts and areas (much of this ground work has already been done).

Recognize/acknowledge that the "Greenest" building is often the one already built, energy and other resources, including those for removal and replacement suggest a cost benefit which should encourage preservation, especially in a community defined by its historic built environment.

Additional Comments at Meeting

1. Whole section is needs context and content added

Section 9.0 Noise Element: Alvarez

In addition to late night and early morning disturbances – the plan needs to include consideration of how many times per week the disturbances occur and its duration.

Clearly acknowledge the right of “quiet enjoyment”.

9.3: This should not just apply to “new or retrofitted” buildings – extend the requirements for changes in use that are likely to cause noise disturbances to nearby residents.

Additional Comments at Meeting

1. Consider mitigation of airport noise

Section 10.0 Historic Preservation Element: Brierton

The proposed districts submitted by GGHPC should be adopted and specifically referenced.

Section 11.0 Implementation

Section 12.0 Appendix

From: David Swarens [<mailto:loscalifornios@aol.com>]

Sent: Wednesday, February 12, 2014 10:47 PM

To: McPherson, Anna

Subject: Scoping comments Greater Golden Hill community plan update

Hello.

I would like to contribute the following comments to the scoping process for review of the Community Plan update for Greater Golden Hill:

The environmental review should consider impacts of density zoning on historic resources, and potential historic resources, especially in historic districts and proposed historic districts (e.g. South Park Historic District).

This analysis should include both impacts of increasing density above that of the historic developments, and also that of retaining density zoning above that of the current/historic development in these areas, which creates pressure to remove or alter these historic resources, as well as alter the spacial relationships of the individual sites to their setting and to each other.

These sites, and the relationships between them, define the character of the community, as well as being individually significant under CEQA.

The review should also analyze the impact of any changes in the street grid, including implementation of "bump outs" at intersections, to community character, (again) especially in Historic Districts and Proposed Historic Districts (e.g. South Park).

Thanks you for this opportunity to comment.

Yours,

David Swarens.

1428 30th Street.

San Diego, CA 92102

SHARON L. GEHL
4301 Hermosa Way
San Diego, CA 92103
(619) 299-9606
slgehl@cox.net

February 24th, 2014

Anna L. McPherson

City of San Diego
Environmental Analysis Section
Development Services Department
1220 First Avenue. MS-501
San Diego, CA 92101

Re: Comments on the Program Environmental Impact Review of the Community Plan Updates for Uptown, North Park, and Greater Golden Hill

Dear Ms. McPherson,

I think that an environmental review that gives useful data and analyses is key to producing Community Plans for Uptown, North Park, and Greater Golden Hill, that will share responsibilities with other neighborhoods in San Diego to provide sufficient housing to meet current and future community needs, and reduce greenhouse gas emissions.

Because neither current nor proposed plan updates would accomplish these goals, a third Smart Growth Plan alternative that would should be considered.

Yours truly,

Sharon Gehl

Enclosed: Comments on the Program Environmental Impact Review of the Community Plan Updates for Uptown, North Park, and Greater Golden Hill

Comments on the Program Environmental Impact Review of the Community Plan Updates for Uptown, North Park, and Greater Golden Hill

To fully understand the impact of proposed Community Plan Updates, I recommend that the following areas and alternatives be looked at as part of the Program Environmental Impact Review of the Community Plan Updates for Uptown, North Park, and Greater Golden Hill.

Land Use Element

Smart Growth Plan alternative

The Review should not only compare the effect of what is being proposed in each community with the current Adopted Plans, it should compare both with an ideal third Smart Growth Plan alternative with Land Uses that would allow for the supply of housing in each community to keep up with the current and expected future demand for new housing. The ideal plan would also incorporate United States Environmental Protection Agency (EPA) Smart Growth studies on *Location Efficiency and Housing Type* to reduce Global Climate Change.

http://www.epa.gov/dced/location_efficiency_BTU.htm

Compliance with requirements and relevant policies with the 2008 City of San Diego General Plan

The three alternatives for each community should be analyzed to see whether or not they comply with the requirements and relevant policies of the 2008 City of San Diego General Plan. Because the proposed Plan Updates would reduce population densities near public transit, the recommendations of the Housing Element and Global Climate Change Elements should be studied in particular.

Goals of the current adopted plan should be analyzed

The current adopted plan for each community should also be analyzed to see how effective it has been in accomplishing its goals since adoption; what has worked should not be changed, while what has not worked should be. As an example, while the current Adopted Plan for

Uptown did result in new development near “Village” centers and public transit; it surprisingly did not result in much actual growth in population, because it also lowered densities to manage growth by limiting the supply of new housing.

Since the current Uptown plan was adopted in 1989, the population of Uptown has grown only .3% annually: from 35,167 in 1990 to 37,855 in 2012. During the same period the City of San Diego as a whole grew .9% annually.

There isn't a lack of demand for housing in Uptown, rather the rise in the cost of living shows that supply hasn't kept up with demand because of the current “slow growth” community plan. City proposals to reduce residual densities further in the Plan Update would likely lower the future growth rate closer to Zero. Uptown is a job center where we should allow market rate housing that can pencil out, where we should allow people to live close to jobs in the medical complex, and close enough to walk or bike to neighborhood businesses. Pushing housing out of the area would create more commuter traffic and damage to the climate.

The *Goals*, page 2 of the introduction to the proposed Uptown Plan Update, should be analyzed to see whether they could be accomplished if future population growth were near zero within the community, and more people drive in from outside. The majority of Uptown businesses, especially restaurants, depend on customers from outside of the district.

The *Population and Housing Trends* on page 4 of the Uptown Draft Introduction has two typos. The number of housing units in 2010 is 22,673, not 2,673. Total population in 2000 is 35,772, not 34,772. The 2020 and 2030 population estimates for Uptown assume a growth rate of 1% annually, which is inconsistent with Draft Plan proposals to reduce residential densities. The population estimates need to be lowered to reflect what is actually being proposed in the Plan Update.

Housing Element

The General Plan housing Element states that community plan updates should be used to advance the goals, objectives, and policies of the City Housing Element.

Since neither the current Adopted Plans nor the proposed Community Plan Updates would be expected to meet projected population needs, they should both be compared with an ideal third Smart Growth Plan alternative with Land Uses that would likely allow for the supply of housing in each community to increase enough to keep up with the expected future demand for new housing.

The housing that would be eliminated by lowering allowed densities in the proposed plan is middle class housing. High end housing should still pencil out.

Ideally, community plans make neighborhoods work better on the local level, as part of a city, and ultimately as part of the world as a whole. That's why the City of San Diego's Master Plan advocates a "City of Villages" approach to concentrate future growth around village centers. The intent is to create community, encourage local businesses, and reduce our carbon footprint; by making it possible for more people to walk, bike, or take public transit to work and stores.

The current environmentally progressive Uptown Community Plan used the same approach when it was done in 1988. It stopped the construction of large condo and apartment buildings on canyon rims, and moved residential development to Village centers and major transportation corridors - close to stores, restaurants, and public transportation. Unfortunately it also lowered residential densities and produced little actual population growth.

The environmental review should investigate where those who are prevented from living in Uptown now, because of current land use regulations, have moved. Have they moved to other sections of the City, neighboring Cities, outside of the region, or out of state? This would give a realistic indication of the effect of lowering densities in the proposed Plan Updates.

The *Housing Element Adequate Sites Inventory* map is not a realistic tool to use in assessing where there is sufficient room for population growth in Uptown. It shows that the El Indio Restaurant and the parking lot across from it in Five Points can be replaced with housing; as can the new Vons, the newly remodeled Albertson, the ten year old mixed commercial and housing section of the Mission Hills Commons, and the historic Funcheon and Ace buildings, all on West Washington Street. Almost all of the current buildings on 4th, 5th, 6th streets, and University Ave. west of Hwy 163 are shown as places where we can replace current buildings with more housing. While this might be possible, it's not likely that more than a small percentage of properties will actually be redeveloped in the 25 years with the current densities, because government tax policies discourage investors from selling their commercial and rental properties. The proposed lower densities in the Draft Plan would reduce the amount of possible places to put new housing further.

Global Climate Change Element

United States Environmental Protection Agency (EPA) Smart Growth studies such as those on *Location Efficiency and Housing Type* should be used to reduce the impact of development on Global Climate Change by planning for energy efficient multifamily housing near public transit. The EPA states that, "How and where we construct our communities has an enormous effect on our energy consumption. Buildings and transportation together account for about 70 percent of energy use in the U.S. and are responsible for 62% of U.S. Greenhouse gas emissions."

http://www.epa.gov/dced/location_efficiency_BTU.htm

Using EPA statistics, what would be the effect on the environment of Draft Plan proposals to reduce the number of people who can live close to jobs, stores and public transit in Uptown?

Economic effect of Plans

The economic effect of each plan on the prosperity of the City and on the city's tax base should also be studied. Reducing residential densities reduces what can be done with a property, produces less building activity, less property value, and a lower tax base for the City. An example is Reynard Way. Nothing new has been built along the north canyon section in the 24 years since the current plan lowered density there in 1989, while 6 new projects were built there in the 10 years before. The Draft Plan for Uptown proposes lowering densities there even further. We need to do something to improve Reynard Way, rather than discourage new housing on a street with convenient bus service. Constructing more housing there would replace blighted buildings, increase the value of properties, and increased the City tax base.

The various land use changes should be analyzed by experts in development to see what would be the likely result. Would the proposed land use reductions actually pencil out and produce middle class housing and middle class jobs, or would they do the opposite?

What would be the effect on the City's tax base of lowering residential densities?

Mobility Element

If future growth in population is intended to be primarily outside of the Uptown district, emphasis should be placed on the mode of transportation that those commuting in from outside of the district use the most, the automobile. The mobility element needs to look for ways to accommodate the planned increase in automobile traffic in Uptown. Sufficient public parking should be provided to meet increased future needs.

A Smart Growth Alternative plan could reduce the amount of traffic in Hillcrest by increasing the amount of workforce housing within walking distance of the hospitals complex.

Public transit needs customers, which means people need to live, work and/or shop near enough to transit stops to use it. Public transit also needs to be convenient enough to use. Increasing rather than decreasing the amount of housing and jobs near public transit would increase transit use.

Streetcar

The proposed streetcar project for a portion of Uptown would be very expensive and not improve transit service. The streetcar would not be any faster than the current public bus if modern streetcars were used and actually slower if antique streetcars were used, because of

the extra time needed to get wheelchairs on and off antique streetcars. The rails in the street would be a trip hazard for pedestrians and bikers, and disconcerting for drivers who get their car wheels caught in the tract. The bridges over Hwy 5 would have to be rebuilt, adding to the expense. The expected cost of a new streetcar line should be included in the proposal.

The environmental report should look at the alternative of improving bus service and use by increasing the frequency of service. People would be more likely to walk to a bus stop if they knew a bus would come in ten minutes or less.

Urban Design Element

Future growth in Uptown and throughout the City of San Diego will come from infill development. Unfortunately infill development has proven hard to do, often because of government regulations. The Urban Designing Elements should be analyzed to see if they would guide change and infill growth, or discourage it.

The character of Uptown is urban not suburban; it's 79% multifamily and only 21% single family according to SANDAG statistics. More multifamily housing near transportation and jobs would enhance the urban character of Uptown.

2012 Uptown Community Planning Area			
Total Population	Total Housing Units	Single Family Detached	Percent Single Family Detached
37,855	23,100	4,740	21%

Mission Hills

Mission Hills does not have “predominantly single-family homes”. According to 2012 census data, it's about a 50% - 50% mix of multi and single family housing.

2012 Mission Hills Housing			
Census Tract	Total Housing Units	Single Family Detached	Percent Single Family Detached
1.00	1,334	1,214	91%
2.01	1,116	472	42%
2.02	2,393	791	33%
61.00	1,261	316	25%
Total	6,104	2,793	46%

Lowering residential block existing densities to try to prevent more multifamily near the “Village Center” would be contrary to the character of Mission Hills. The Draft Plan Update proposes

making the majority of properties on many streets “non - conforming”, in an attempt to reduce existing residential densities by replacing existing multifamily buildings.

Sustainable Design Strategy

The Sustainable Design Strategy should also recommend that older energy inefficient housing near “Village Center” and transportation corridors be replaced with energy efficient multifamily housing. Just as older cars that get low mileage are bad for the environment, older buildings with little or no insulation and single pane windows are bad for the environment. Just as new cars are designed to use less gasoline, newer buildings are designed to use less energy and produce less greenhouse gas.

United States Environmental Protection Agency (EPA) Smart Growth studies such as those on *Location Efficiency and Housing Type* should be used to reduce the impact of development on Global Climate Change by planning for energy efficient multifamily housing near public transit. The EPA states that, “How and where we construct our communities has an enormous effect on our energy consumption. Buildings and transportation together account for about 70 percent of energy use in the U.S. and are responsible for 62% of U.S. Greenhouse gas emissions.”

http://www.epa.gov/dced/location_efficiency_BTU.htm

The environmental review should look at the effect on the environment of Draft Plan recommendations to build fewer energy efficient new multifamily housing units near public transit, while trying to discourage or prevent the replacement of the older energy inefficient housing in areas both close and far from public transit.

Economic Prosperity Element

The Economic Prosperity Element assumes that the residential population in Uptown will increase in the future, which is contrary to proposed reductions in land use residential densities. This section could be used in an alternative Smart Growth Plan, but would need to be rewritten for a Draft Plan that proposes to reduce population growth rates closer to zero.

If people buy or rent in Hillcrest, it might be because they have a job nearby, but mainly it’s because they want to shop or eat in Hillcrest. More customers who want to live in Hillcrest would be better for the environment and better for retail businesses and restaurants.

The industrial section of Uptown along Hwy 5 should be protected from incursions of incompatible residential housing.

What affect would reducing building heights have on future construction of office space in Uptown?

Public Facilities, Services & Safety Element

What would be the expected effect of reduced DIF funding caused by lowered densities and other restrictions on development in all three communities?

Recreation Element

All options for park use of the properties at 3532 Reynard Way should be considered. The option of acquiring a much needed local Children's Playground and Dog Park as part of a multifamily housing project should not be precluded by designating the properties as Park only. Because there is little funding for new parks, the City should leave their options open.

Historic

There is confusion about what Historic Designation is. The purpose of historic designation is to create museum displays that can be used to educate people. In San Diego we have museums to educate people about art, toy trains, ships, cars, local history, airplanes, sports, and animals (zoo). We also have house museums, like the Marston House. Historic Districts are museum displays seen from the street.

Second point; all museums cost money. Rarely can they be supported by charging for admission alone, they need additional money from private individuals or from tax payers. People do not pay the City to see Historic Districts. The costs are born by the property owners and/or tax payers through huge Mills Act tax subsidies.

The environmental review should estimate the cost to the City of current Mills Act subsidies in each Plan area, and future estimated costs if all proposed Historic Districts were established, under the assumption that the owners of most properties with historic designation would apply and be given Mills Act subsidies. What would be the negative effect on funding for schools, public safety, facility maintenance and other City programs? How much funding would be cut per school?

Third point; the City does not get any value in exchange for these large tax subsidies for high income housing. The average person walking or driving through Mission Hills or any other part of Uptown can't tell which houses have historic designation or are part of a Historic District unless they see a plaque. It all looks the same. The tax subsidies do not make any difference. Most people with million dollar houses take care of their properties; they don't need tax subsidies for maintenance. It is questionable whether anyone who can afford to own a house should be subsidized by the City, when the City can't afford to give subsidies to all of the low income residents who need help.

Fourth point; historic preservationists and property owners have different goals. Preservationists want buildings that reflect a “historically significant period” which they can use to illustrate a story. (Note it is not necessary that the story be accurate, only that someone will pay to hear it; hence the prevalence of Ghost tours.)

Preservationist want drafty single pane windows left in place as part of the museum display. Homeowners want homes that are comfortable and functional for their families. They might want to replace drafty windows with energy effect double pane windows, add a dishwasher, a second bathroom, a third bedroom, or a bigger closet. Changing and adapting buildings to meet new needs is what people have done throughout history. While pretending that a building is “historic” and has never changed, (hide that dishwasher), may be fashionable among preservationists, a remodeled building is actually more accurate historically.

Fifth Point; old buildings are bad for the environment, because they need more energy to heat and cool than would an equivalent sized new house that meets modern Title 24 energy requirements. The environmental review should estimate the environmental damage caused by the high percentage of energy inefficient old structures in the three Plan Update communities and question all proposals to discourage or prevent property owners from replacing or remodeling them.

How many single family homes would be prevented from being replaced by lowering the allowed residential densities in land use regulations?

When property owners extensively remodel, rebuild, or replace old buildings with something more energy efficient, their properties increase in value, they raise the value of nearby houses, and pay more in property taxes. Preventing owners from rebuilding or replacing energy inefficient blighted houses is bad for the environment, bad for neighborhood character, bad for the local economy, and bad for the City’s tax base.

Conclusion

An environmental review that gives useful data and analyses is key to producing Community Plans for Uptown, North Park, and Greater Golden Hill that share responsibilities with other neighborhoods in San Diego to provide sufficient housing to meet current and future needs, and reduce greenhouse gas emissions.

Because neither current nor proposed plan updates would accomplish these goals, a third Smart Growth Plan alternative that would should be considered.

Walt Scott Chambers [walter@sdgreatstreets.org]

Sent: Thursday, January 02, 2014 2:52 PM
To: DSD EAS
Subject: COMMUNITY PLAN UPDATES FOR THE UPTOWN - NORTH
PARK - GREATER GOLDEN HILL COMMUNITIES
Attachments: Uptown 21C.pdf

To Whom It May Concern,

Please see the attached response / proposal (.PDF) to the Public Notice of the Draft Program Environmental Impact Report (PEIR) for the Community Plan Updates for the Uptown - North Park - Greater Golden Hill Communities.

In response to the PEIR Public Notice, and in particular the "Identification of improvements to existing mobility infrastructure increase bicycle, pedestrian and transit use, including a separate study for a streetcar line in Uptown;

And in response to "Transportation/Circulation/Park", "Air Quality", "Global Climate Change", "Energy", "Health and Safety" Sections.

Walter Chambers
Great Streets San Diego



www.sdgreatstreets.org
www.facebook.com/sdgreatstreets

3740 Park Blvd Apt 613
San Diego, CA 92103
619-651-3860