

**Appendix A**

**Notice of Preparation and Comment Letters**





THE CITY OF SAN DIEGO

PLANNING DEPARTMENT

Date of Notice: November 4, 2015

PUBLIC NOTICE

OF THE PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT  
AND

SCOPING MEETINGS

INTERNAL ORDER No. 21002576/11001369

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**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 (NOP) of a PEIR and Scoping Meetings was publicly noticed and distributed on **November 4, 2015**.

This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego Planning Department website under the heading “Draft CEQA Documents” and can be accessed using the following link:

<http://www.sandiego.gov/planning/programs/ceqa/index.shtml>

The NOP has also been placed on the City Clerk website at:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>.

**SCOPING MEETING:** Two public scoping meetings will be held by the City of San Diego’s Planning Department, one for Midway-Pacific Highway on **Wednesday, November 18, 2015** from 5:30 PM to 7:30 PM at the San Diego Continuing Education Center, West City Campus, 3249 Fordham Street, Room 205, San Diego, CA 92110, and one for Old Town San Diego on **Friday, November 20, 2015** from 3:00 PM to 5:00 PM at the Caltrans District 11 Office, Garcia Auditorium, 4050 Taylor Street, San Diego, CA 92110. **Please note that depending on the number of attendees, the meeting could end earlier than the end times noted above.** Verbal and written comments regarding the scope and alternatives of the proposed PEIR will be accepted at the meeting.

Please send in written/mail-in comments to the following address: **Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010 Second Avenue, MS 614C, San Diego, CA 92101** or e-mail your comments to [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov) with the Project Name and Number 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:** Midway-Pacific Highway and Old Town San Diego Community Plan Updates

**PROJECT NO.:** 453425

**COMMUNITY PLAN AREAS:** Midway-Pacific Highway and Old Town San Diego

**COUNCIL DISTRICTS:** 2 (Zapf) and 3 (Gloria)

**APPLICANT:** City of San Diego, Planning Department

**PROJECT DESCRIPTION:** The project is the update of two adjacent Community Plans – Midway-Pacific Highway and Old Town San Diego. The proposed updates for both plans provide a long term comprehensive policy framework for growth and development in these communities, and would serve as the basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. The updates incorporate relevant policies from the 2008 City of San Diego General Plan and provide community specific land use designations, and policies and recommendations. Each Community Plan contains introduction and implementation chapters and the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Conservation; Recreation; Noise; and Historic Preservation. Although separate community plans are being prepared for each community, the updated Community Plans would be evaluated in a single PEIR.

In addition to adoption of the two community plan updates, the project includes: Amendments to the General Plan to incorporate the updated community plans; Providing site-specific policies; Amendments to the Land Development Code for adoption of a rezone and Community Plan Implementation Overlay Zones (CPIOZ); Amendment to the Old Town San Diego Planned District Ordinances (PDO); and Comprehensive updates to both existing Public Facilities Financing Plans resulting in two new Impact Fee Studies (IFS) for each plan area. The actions together with the proposed CPUs form the Project for this EIR. Discretionary actions by other agencies include recommendation from the San Diego County Regional Airport Authority and the California Coastal Commission.

### **Midway-Pacific Highway**

The Midway-Pacific Highway Community Plan area is an urbanized community that encompasses approximately 1,313 acres of land situated north of Downtown. The community is comprised of three areas: the Midway area, the Pacific Highway Corridor, and the Marine Corps Recruit Depot. A portion of the Pacific Highway Corridor is within the Coastal Zone and subject to the California Coastal Act as implemented by the Midway-Pacific Highway Local Coastal Program and zoning regulations. The Coastal Height Limit Overlay Zone also applies to the entire Midway-Pacific Highway community. This Overlay Zone limits construction of new development to 30-feet in height to protect coastal views.

The Midway-Pacific Highway Community Plan and Local Coastal Program (Community Plan) provides goals and policies establishment of distinct districts and villages connected through a system of landscaped streets to create a sense of place and pedestrian and bicycle linkages to Mission Bay Park, the San Diego River Park, Old Town San Diego, and San Diego Bay, and to traditional and nontraditional parks within the community. The plan envisions multi-modal improvements to address vehicular needs, enhance the pedestrian environment with streetscape and sidewalk improvements, and improve bicyclist experience by providing bicycle facilities. The Community Plan further envisions Midway-Pacific Highway as a multiple use sub-regional employment center, with strong employment and residential components.

### **Old Town San Diego**

Old Town San Diego has significant historical importance for the City of San Diego. It is the site of initial settlement in the City and the birthplace of the State of California. The 274-acre community contains 37 properties that have been designated as historical resources by the San Diego Historical Resources Board or designated at state and/or national levels.

The updated Community Plan provides goals and policies that preserve and enhance the historical significance of the area and support a balance between residential and visitor-oriented uses. The updated Community Plan provides land use and urban design policies to ensure that new development is historically compatible with an appearance reflective of the community's history prior to 1871. The updated Old Town San Diego Planned District within the Municipal Code implements the Community Plan policies through zoning and development

regulations and controls pertaining to land use density and intensity, building massing, landscape, streetscape, parking, and other criteria.

The updated Community Plan includes discussions and policies to improve the understanding of the historic context of Old Town; incorporates the architectural and site development standards and criteria into the Urban Design element for new development in the community; and provides updated photographs, illustrations, graphics, and maps that capture examples of historically compatible architecture and urban design within Old Town. The Community Plan envisions Old Town San Diego as a pedestrian-oriented historical small town. It seeks to ensure that new buildings and uses enhance the community character and livability with a strong emphasis on design that respects the history of the community and encourages pedestrian activity. To achieve this vision, the Community Plan specifies context sensitive policies for land use by sub-district. The Community Plan recommends mobility and streetscape improvements to enhance the pedestrian environment. Improvements would be consistent with the historic character of the community and would incorporate design features that relate to Old Town San Diego's small-town scale and history.

The Planning Department is also soliciting public input and comments on both draft community plan updates covered in this NOP. These documents can be reviewed on the Planning Department website at:  
[http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/midway\\_pacific\\_highway\\_cpu\\_draft.pdf](http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/midway_pacific_highway_cpu_draft.pdf)  
<http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/oldtownsdcpuseptember2015.pdf>

**Recommended Finding:** Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Land Use, Transportation/Circulation, Visual Effects and Neighborhood Character, Air Quality, Greenhouse Gas Emissions, Energy, Noise, Historical Resources, Biological Resources, Geologic Conditions, Paleontological Resources, Hydrology and Water Quality, Public Services and Facilities, Public Utilities, Health and Safety, and Population and Housing.**

**Availability in Alternative Format:** To request the this Notice or the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Planning Department at (619) 235-5200 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Susan Morrison at (619) 533-6492. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, in the Planning Department at 1010 Second Avenue, Suite 1400. For information regarding public meetings/hearings on this project, contact Senior Planner, Vickie White at (619) 533-3945 or via email: [VWhite@sandiego.gov](mailto:VWhite@sandiego.gov). This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on **November 4, 2015**.

Martha Blake  
Interim Deputy Director  
Planning Department

**DISTRIBUTION:** See Attached

**ATTACHMENTS:** Regional Location Map  
Scoping Letter

## DISTRIBUTION LIST:

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

### **United States Government**

Federal Aviation Administration (1)  
Naval Facilities Engineering Command, SW Division, Environmental Planning (12)  
Marine Corps Recruit Depot Facilities Div. (14)  
Environmental Protection Agency (19)  
U. S. Fish and Wildlife Service (23)  
Army Corps of Engineers (26)

### **State of California**

Caltrans District 11 (31)  
Department of Fish and Wildlife (32)  
Cal Recycle (35)  
California Environmental Protection Agency (37A)  
Department of Toxic Substance Control (39)  
Housing and Community Development (38)  
Natural Resources Agency (43)  
Regional Water Quality Control Board, Region 9 (44)  
State Clearinghouse (46A)  
California Coastal Commission (47)  
California Air Resources Board (49)  
California Transportation Commission (51)  
California Department of Transportation (51A)  
Native American Heritage Commission (56)  
California State Parks, San Diego Coast District (40A)  
California Department of Parks and Recreation, Southern Service Center (40B)

### **San Diego County**

Air Pollution Control Board (65)  
Planning and Land Use (68)  
Parks Department (69)  
Public Works (72)  
County Water Authority (73)  
Department of Environmental Health (76)

### **City of San Diego**

Office of the Mayor (91)  
Council President Lightner, District 1  
Councilmember Zapf, 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  
Council President Pro Tem Emerald, District 9

Office of the City Attorney

Shannon Thomas

Planning Department

Jeff Murphy, Director  
Tom Tomlinson, Assistant Director  
Nancy Bragado, Deputy Director  
Martha Blake, Interim Deputy Director  
Tait Galloway, Program Manager  
Vickie White, Project Manager – Long Range Planning  
Elizabeth Ocampo, Associate Planner – Long Range Planning  
Myra Herrmann, Senior Planner  
Susan Morrison, Associate Planner  
Kristy Forburger, Senior Planner – MCSP  
Samir Hajjiri, Mobility Planning  
Maureen Gardiner, Mobility Planning  
Jeff Harkness, Park Planning  
Oscar Galvez III, Facilities Financing

Environmental Services Department

Lisa Wood, Senior Planner

Development Services Department

Angela Nazareno, Project Manager

Public Utilities Department

Halla Razak, Director  
John Helminski  
Keli Balo

Public Works Department

James Nagelvoort, Director

Park and Recreation Department

Herman Parker, Director  
Andrew Field

Fire-Rescue Department

Chief Brian Fennessy  
Chief Rick Wurts

Police Department

Chief Shelley Zimmerman

Transportation & Storm Water Department

Kris McFadden, Director

Andrew Kleis

Ruth Kolb

Linda Marabian

Mark Stephens

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

City Government

San Diego Housing Commission (88)

City Advisory Boards or Committees

Park and Recreation Board (83)

Community Forest Advisory Board (90)

Historical Resources Board (87)

Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A)

Linda Vista Branch Library (81M)

Mission Hills Branch Library (81Q)

Mission Valley Branch Library (81R)

Ocean Beach Branch Library (81V)

Point Loma/Hervey Branch Library (81Z)

**Other City Governments**

San Diego Association of Governments (108)

San Diego Unified Port District (109)

San Diego County Regional Airport Authority (110)

Metropolitan Transit System (112/115)

San Diego Gas & Electric (114)

**School Districts**

San Diego Unified School District (125)

San Diego Community College District (133)

**Community Planning Groups or Committees**

Community Planners Committee (194)

Midway/Pacific Highway Community Planning Group (307)

Mission Valley Unified Planning Organization (331)

Old Town Community Planning Committee (368)

Uptown Planners (498)



## **Community Councils**

Mission Valley Community Council (328 C)

## **Other Agencies, Organizations and Individuals**

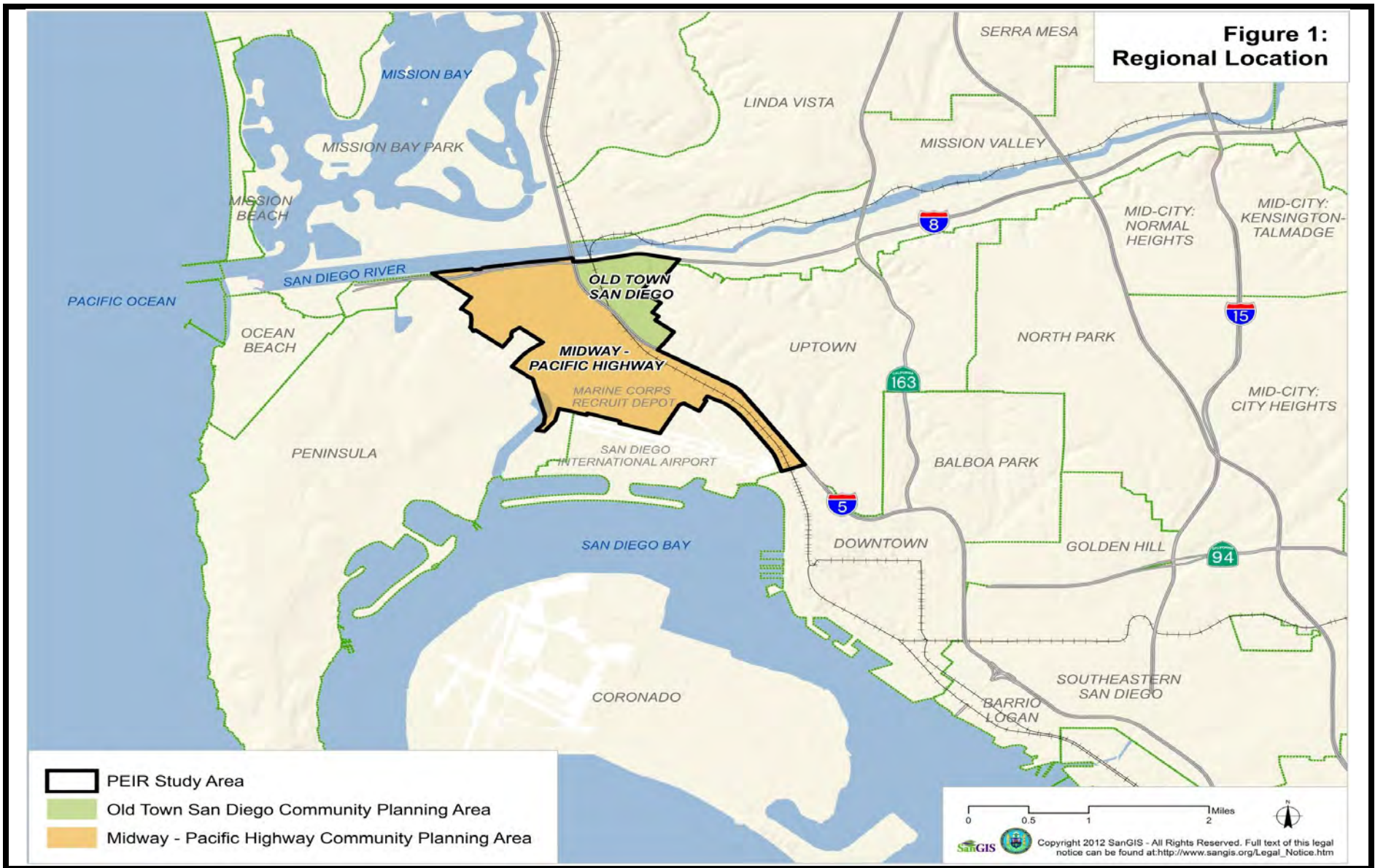
San Diego Chamber of Commerce (157)  
Building Industry Association (158)  
San Diego River Park Foundation (163)  
San Diego River Coalition (164)  
Sierra Club (165)  
San Diego Canyonlands (165A)  
San Diego Natural History Museum (166)  
San Diego Audubon Society (167)  
Jim Peugh (167A)  
San Diego River Conservancy (168)  
Environmental Health Coalition (169)  
California Native Plant Society (170)  
San Diego Coastkeeper (173)  
Citizens Coordinate for Century 3 (179)  
Endangered Habitats League (182 & 182A)  
League of Women Voters (192)  
Carmen Lucas (206)  
South Coastal Information Center (210)  
San Diego Historical Society (211)  
San Diego Archaeological Center (212)  
Save Our Heritage Organization (214)  
Ron Chrisman (215)  
Clint Linton (215B)  
Frank Brown - Inter-Tribal Cultural Resource Council (216)  
Campo Band of Mission Indians (217)  
San Diego County Archaeological Society Inc. (218)  
Kuumeyaay Cultural Heritage Preservation (223)  
Kuumeyaay Cultural Repatriation Committee (225)  
Native American Distribution  
    Barona Group of Capitan Grande Band of Mission Indians (225A)  
    Campo Band of Mission Indians (225B)  
    Ewiiapaayp Band of Mission Indians (225C)  
    Inaja Band of Mission Indians (225D)  
    Jamul Indian Village (225E)  
    La Posta Band of Mission Indians (225F)  
    Manzanita Band of Mission Indians (225G)  
    Sycuan Band of Mission Indians (225H)  
    Viejas Group of Capitan Grande Band of Mission Indians (225I)  
    Mesa Grande Band of Mission Indians (225J)  
    San Pasqual Band of Mission Indians (225K)  
    Ipa Nation of Santa Ysabel (225L)  
    La Jolla Band of Mission Indians (225M)  
    Pala Band of Mission Indians (225N)

Pauma Band of Mission Indians (225O)  
Pechanga Band of Mission Indians (225P)  
Rincon Band of Luiseno Indians (225Q)  
San Luis Rey Band of Luiseno Indians (225R)  
Los Coyotes Band of Mission Indians (225S)  
San Diego River Park Foundation (333)  
Friends of the Mission Valley Preserve (330B)  
Midway/Pacific Highway Community Planning Group (307)  
Old Town Community Planning Committee (368)  
Old Town Chamber of Commerce (369)  
Presidio Park Council (370)  
Kim Adler  
Karl Anderson  
Hector Baca  
Jaime Barton  
Dorothy Benavides  
Jack Borgos  
Walter Bradfield  
Bill Cardenas  
Jo-AnnCarini  
Robert Chakarian  
Monique Chausse  
Ron Christman  
Trevor Clarke  
Neva Cobian  
Philip Conard  
Mal & Sandra Daniel  
Robert De Anthony  
Otto Emme  
Ed Farley  
JeannieFerrell  
Walter Fiedler  
Graham Forbes  
Michael Freedman  
Jim Gallagher  
Elaine Garrett  
Judy Gervais  
Joe Ghio  
Glen Gundert  
William Haifley  
Gudrun Hoffmeister  
Tom Hoyt  
Robert Johnson  
Roy Johnson  
William Kenton  
Maureen King  
Robin Kole

Marti Kranzberg  
Fong-Ping Lee  
Doug Livingston  
Brian Longmore  
Nora Lovejoy  
Joe Mannino  
Nancy McGehee  
Ann Merritt  
Omar Mobayed  
Lisa Mortensen  
Jerry Navarra  
Ignacio Orduno  
Donal O'Sullivan  
Guy Preuss  
Gary Pryor  
Bianca Romani  
Donald Rudesill  
Jim Seman  
Dennis Sharp  
Vera Shepard  
Betty Slater  
Arlette Smith  
Gregory Smith  
Caroline St Clair  
Dean Stratton  
Margaret Townsend  
Richard Warner  
Clifford Weiler  
Patti Adams  
Don Arthur  
Hector Baca  
Jaime Barton  
Murtaza Baxamusa  
Bryan Bebb  
Fred Blecksmith  
Walter Bradfield  
Dixie Brien  
Jo-Ann Carini  
Chris Clifford  
Neva Cobian  
Philip Conard  
Don Correia  
Sheila Deuchars  
Sheila Donovan  
Otto Emme  
Walter Fiedler  
Graham Forbes

Jim Gallagher  
Elaine Garrett  
Tom Gawronski  
Joe Ghio  
Edwina Goddard  
Jennifer Goudeau  
Glen Gundert  
William Haifley  
Gudrun Hoffmeister  
Ed Huggin  
Rob Hutsel  
Richard Jensen  
Robert Johnson  
Roy Johnson  
Bob Kennedy  
Robin Kole  
Marti Kranzberg  
Fong-Ping Lee  
Brian Longmore  
Nora Lovejoy  
Judy Maddox  
Alan Marshall  
Ward Martin  
Nancy McGehee  
Omar Mobayed  
Robert Orphey  
Donal O'Sullivan  
John Pedersen  
David Pettigrew  
Guy Preuss  
Gary Pryor  
Dale Pursel  
Patti Rank  
Jorgen Rasmussen  
John Rickards  
Christine Robinson  
Mignon Scherer  
Richard Sells  
Jim Seman  
Dennis Sharp  
T Sheldon  
Arlette Smith  
Gregory Smith  
R Smith  
Dean Stratton  
Anne Terhune  
Thomas Traver

Kim Wallace  
Clifford Weiler  
Lee Winslett  
Diana Woodside  
Anthony Briggs Law Corporation



## Regional Location Map

Midway-Pacific Highway and Old Town San Diego Community Plan Updates  
 City of San Diego – Planning Department



## THE CITY OF SAN DIEGO

**DATE:** November 4, 2015

**SUBJECT:** Scope of Work for a Draft Program Environmental Impact Report for the Midway-Pacific Highway and Old Town San Diego Community Plan Updates

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Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental and Resource Analysis (E&RA) Division of the City of San Diego Planning 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 Midway/Pacific Highway and Old Town San Diego Community Plan Updates.

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) has been 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, and two public scoping meetings have been scheduled: one for Midway-Pacific Highway on **Wednesday, November 18, 2015** from 5:30 PM to 7:30 PM at the San Diego Continuing Education Center, West City Campus, 3249 Fordham Street, Room 205, San Diego, CA 92110, and one for Old Town San Diego on **Friday, November 20, 2015** from 3:00 PM to 5:00 PM at the Caltrans District 11 Office, Garcia Auditorium, 4050 Taylor Street, San Diego, CA 92110.

Please note, changes or additions to the scope of work may be required as a result of public input received in response to the NOP 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 PEIR should also include sufficient graphics and tables to provide a complete description of all major project features.

## ***Project Description***

The project is the update of two adjacent Community Plans – Midway-Pacific Highway and Old Town San Diego. The proposed updates for both plans provide a long term comprehensive policy framework for growth and development in these communities, and would serve as the basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. The updates incorporate relevant policies from the 2008 City of San Diego General Plan and provide community specific land use designations, and policies and recommendations. Each Community Plan contains introduction and implementation chapters and the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Conservation; Recreation; Noise; and Historic Preservation. Although separate community plans are being prepared for each community, the updated Community Plans would be evaluated in a single PEIR.

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<http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/oldtownsdcpcuseptember2015.pdf>

## **PEIR FORMAT AND CONTENT**

### **A. INTRODUCTION**

The introductory chapter of the PEIR should introduce the proposed Community Plan Updates, with a brief discussion on the intended use and purpose of the PEIR. The chapter should 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 should also be described.

B. ENVIRONMENTAL SETTING

The PEIR should describe the general location of each community plan area and present it on a 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)/Multi-Habitat Planning Area (MHPA), and environmentally sensitive lands such as steep hillsides, wetlands, and the Federal Emergency Management Agency (FEMA) 100 year floodplains or floodways. If a potential cumulative effect for an impact category is to be discussed in the PEIR, this section should 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 should include a brief description of police and fire facilities and the emergency response times for each community and the two Community Plan areas when considered as a whole.

C. PROJECT DESCRIPTION

The PEIR should 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. The project description should 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.

Pursuant to the CEQA Guidelines (Section 15168), a Program EIR allows the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and allow reduction in paperwork. In addition, it may be used with the intent of streamlining and limiting the later environmental review required for subsequent actions associated with ordinance implementation.

D. HISTORY OF PROJECT CHANGES

This section of the PEIR should outline the history of the project and any material changes that have been made to each of the Community Plan Updates in response to environmental concerns raised during public and agency review of the project (i.e., in response to NOP or public scoping meetings or during the public review period for the Draft PEIR).

E. ENVIRONMENTAL ISSUES

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 should include an explanation of the existing conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative 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 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 provisions 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 project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?*

The project proposes the update to two community plans located in the central area of the City: Midway-Pacific Highway and Old Town San Diego. The Land Use section should describe land use patterns, the extent of urban development, density and intensity of existing development, and future land use projections based upon the updated Midway-Pacific Highway and Old Town San Diego Community Plans. The relationship of the community plans to the General Plan, and other existing and proposed tools for implementing the General Plan policies should also be addressed. If there are potential inconsistencies of the project with adopted plans, and those inconsistencies would create environmental impacts, this section should describe whether or not these potential impacts would lead to physical significant effects.

The PEIR should 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), the MSCP Subarea Plan, the SANDAG Sustainable Community Strategy (SCS), and the applicable Local Coastal Program. The relationship of each Community Plan Update with the City's MSCP Subarea Plan should be discussed, and a determination made relative to the potential that the project could conflict with the MSCP. Each Community Plan Update should also be evaluated with regards to applicable Airport Influence Area(s) and

associated ALUCPs. 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.

## **TRANSPORTATION/CIRCULATION**

- Issue 1: 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 2: Would the project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?*
- Issue 3: Would the project have a substantial impact upon existing or planned transportation systems?*
- Issue 4: 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 5: Would the project conflict with adopted policies, plans or programs supporting alternative transportation modes?*

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

The traffic study and PEIR should 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 should be incorporated into this section of the PEIR. Specifically, this section should address any proposed alterations to the present circulation element and effects on circulation movements within and between each community. The traffic study and PEIR should 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, this section should address if any proposed land use changes to each Community Plan would result in parking congestion in the community.

## **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 4: 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 5: Would the project result in a substantial change in the existing landform?*

*Issue 6: Would the project create substantial light or glare which would adversely affect daytime or nighttime view in the area?*

This section of the PEIR should 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 Midway-Pacific Highway and Old Town San Diego communities. It should 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 should 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.

Being as a portion of the Midway-Pacific Highway CPU area falls within the Coastal Zone, this section should also provide an analysis of coastal views relative to any proposed land use or zoning changes.

## **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 expose sensitive receptors to substantial pollutant concentrations?*

*Issue 4: 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 and 8, as well as State Route 163 near 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 two community plan areas as a whole.

## **GREENHOUSE GAS EMISSIONS**

*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 CO<sub>2</sub> 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 project result in the use of excessive amounts of electrical power?*

*Issue 2: Would the project 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 project result in or create a significant increase in the existing ambient noise levels?*

*Issue 2: Would the project cause exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of 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: Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?*

*Issue 2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?*

*Issue 3: Would implementation of the project result in any impact to existing religious or sacred uses within the CPU areas?*

*Issue 4: Would implementation of the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?*

Both communities have played an important role in the City's history and development, and important historical resources remain today in both communities. A historical resources evaluation has already been prepared which identifies impacts to historical resources within each community that could result with implementation of the Community Plan Updates. This section of the PEIR shall incorporate information from both the archaeological and historical reports and describe whether or not implementation of the Community Plan Updates would negatively affect the preservation of archaeological or historical resources within the respective communities. This section of the PEIR should also describe how the policies of the Historic Preservation Element would reduce any potential impacts to historical resources.

## **BIOLOGICAL RESOURCES**

*Issue 1: Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or US Fish and Wildlife Service (USFWS)?*

*Issue 2: Would the project result in a substantial adverse impact either directly or through habitat modifications (including Tier I, II, IIIA, or IIIB Habitats as identified in the Biology Guidelines of the Land Development manual), on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program (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 3: Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?*

*Issue 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?*

*Issue 5: Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?*

*Issue 6: Would the project introduce land uses within an area adjacent to the MHPA*



*that would result in adverse edge effects?*

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 proposed community plan update 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 community.

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, and 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, and solid waste disposal?*

*Issue 2: Would the project result in the use of excessive amounts of water?*

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 2015 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 result in a safety hazard for people residing or working in a designated airport influence area?*

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.

## **POPULATION AND HOUSING**

*Issue 1: Would the project displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?*

*Issue 2: Would implementation of the project induce substantial population growth in the area, either directly or indirectly?*

The PEIR shall identify any increases in population within the community that may result from the revised land use designations associated with the proposed Community Plan Updates. It shall also discuss the potential for implementation of the Community Plan Updates to displace substantial numbers of people or housing and discuss ways to reduce displacement should it be determined to occur. The PEIR shall also evaluate whether the community plan would induce growth (e.g. creation of new roads or utilities needed to accommodate additional growth in the community).

### **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 Midway-Pacific Highway and Old Town San Diego 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 – Adopted Community Plans*

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 within 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 Susan Morrison at (619) 533-6492 or e-mail at [simorrison@sandiego.gov](mailto:simorrison@sandiego.gov).





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

December 2, 2015

File Number 3330300

Ms. Susan Morrison  
City of San Diego  
1010 Second Avenue  
Suite 1400, MS 614C  
San Diego, CA 92101

Dear Ms. Morrison:

**SUBJECT: Comments on the Midway-Pacific Highway and Old Town San Diego Community Plan Updates Notice of Preparation**

Thank you for the opportunity to comment on the Midway-Pacific Highway and Old Town San Diego Community Plan Updates Notice of Preparation (NOP). The project is the update of two adjacent community plans. The proposed updates for both plans provide a long-term comprehensive policy framework for growth and development in these communities, and would serve as the basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. Although separate community plans are being prepared for each community, the updated Community Plans would be evaluated in a single Programmatic Environmental Impact Report (PEIR).

Our comments are based on policies included in San Diego Forward: The Regional Plan (Regional Plan) and are submitted from a regional perspective, emphasizing the need for land use and transportation coordination, and implementation of smart growth and sustainable development principles. A key goal of these regional plans is to focus on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure to create a more sustainable region.

The Regional Plan sets forth a multimodal approach to meeting the region's transportation needs. Therefore, it is recommended that the proposed project consider the needs of motorists, transit riders, pedestrians, bicyclists, and integration with a robust Transportation Demand Management (TDM) Program. The San Diego Association of Governments (SANDAG) recommends that the following comments be addressed:

**Transportation Demand Management**

Please consider incorporating TDM measures into the Midway-Pacific Highway and Old Town San Diego Community Plan Updates and PEIR to promote alternative travel modes that can help alleviate traffic congestion in and around the project areas. TDM measures could include the provision and promotion of shared mobility services (e.g., bikeshare, carshare, and on-demand ridesharing services); parking management strategies such as

*MEMBER AGENCIES*

- Cities of*
- Carlsbad*
- Chula Vista*
- Coronado*
- Del Mar*
- El Cajon*
- Encinitas*
- Escondido*
- Imperial Beach*
- La Mesa*
- Lemon Grove*
- National City*
- Oceanside*
- Poway*
- San Diego*
- San Marcos*
- Santee*
- Solana Beach*
- Vista*
- and*
- County of San Diego*

*ADVISORY MEMBERS*

- Imperial County*
- California Department of Transportation*
- Metropolitan Transit System*
- North County Transit District*
- United States Department of Defense*
- San Diego Unified Port District*
- San Diego County Water Authority*
- Southern California Tribal Chairmen's Association*
- Mexico*

priced parking, priority parking for carpools and carshare vehicles; and secure and convenient bike parking coupled with bike repair stands at transit stations and key destinations. The SANDAG iCommute program can assist with the integration of these measures and promotion of other existing commute services (e.g., SANDAG Vanpool Program, Guaranteed Ride Home, ridematching, and trip planning) as part of the community plan update process.

We appreciate the opportunity to comment on the Midway-Pacific Highway and Old Town San Diego Community Plan Updates NOP.

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

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

Intergovernmental review procedures of the State of California give each local clearinghouse the authority to determine whether a project will need to be reviewed. In reviewing environmental documents, persons and public agencies should focus on the sufficiency of the document by identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.

When available, please send the draft of the Environmental Impact Report to:

Intergovernmental Coordination  
C/O SANDAG  
401 B Street, Suite 800  
San Diego, CA 92101

We appreciate the notification of your proposed project and encourage you to keep us informed of any changes in the project.

If you have any questions, or if we can be of assistance in any way, please contact me at (619) 699-1943 or via email at susan.baldwin@sandag.org.

Sincerely,

A handwritten signature in blue ink that reads "Susan Baldwin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

SUSAN BALDWIN  
Senior Regional Planner

SBA/DGA/bga/epo/kcu



## **Midway-Pacific Highway & Old Town Community Plan Updates Notice of Preparation - Draft Program Environmental Impact Report**

COMMENTS SUBMITTED BY CITY OF SAN DIEGO STORM WATER DIVISION  
12/3/15

- Note that portions of the area involved in the Community Plan Updates drain to the San Diego River Watershed Management Area, while other portions drain to the San Diego Bay Watershed Management Area.
- Incorporate Storm Water Standards Manual compliant Low Impact Development (LID) features into site design on public and private properties as required for development per the most current Municipal Separate Storm Sewer System (MS4) Permit.
- Consider using permeable surfaces to repave public areas and public/private parking lots.
- Consider opportunities for installing treatment control Best Management Practices (BMPs) into recreational facilities such as parks.
- Installation of LID features should not conflict with street tree placement.
- Any street redesign/retrofit should allow adequate clearance for street sweeping operations.
- Note that runoff (e.g., during rainstorms) can be from pervious surfaces such as soils or lawns and other landscaped areas, (and potentially transmit pollutants such as pesticides, fertilizer, bacteria, sediment, etc.), as well as from impervious surfaces.
- Address storm water infrastructure for both communities.



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711

www.dot.ca.gov



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November 23, 2015

11-SD-VAR

(5, 8)

Midway-Pacific Highway and

Old Town San Diego

Community Plan Updates

SCH# 2015111013

Ms. Susan Morrison  
City of San Diego  
Planning Department  
1010 Second Avenue, Suite 1400, MS 614C  
San Diego, CA 92101

Dear Ms. Morrison:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of San Diego's (City) Midway-Pacific Highway and Old Town San Diego Community Plan Updates (Plan), for which the areas are served by Interstate 5 (I-5) and Interstate 8 (I-8). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans has reviewed the Notice of Preparation (NOP) for the Midway-Pacific Highway and Old Town San Diego Community Plan Updates draft Environmental Impact Report (EIR), and has the following comments:

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

Caltrans supports the concept of a local circulation system that is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. As a result, potential transit mitigation for development impacts should also be analyzed, such as improved transit accommodation through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements that can improve mobility and alleviate traffic

impacts to State facilities.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Please note that any work performed within Caltrans Right of Way (R/W) (e.g. for community gateways in the Land Use and Urban Design Elements) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Additional information regarding encroachment permits may be obtained by contacting the Caltrans District 11 Encroachment Permits Office at (619) 688-6158 or visiting the following website: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. Early coordination with Caltrans is strongly advised for all encroachment permits.

SANDAG in partnership with Caltrans and the City of San Diego has completed a draft of the I-8 Corridor Study. In that study future improvements include active transportation for bicycles and pedestrians. Please reference this study. If you have any questions regarding the I-8 Corridor Study, please contact Roy Abboud Caltrans I-8 Corridor Planning IGR Lead at (619) 688-6968.

- On Page 9 of the Midway – Pacific Highway Community Plan and Local Coast Program, Box 1-1: Consider adding that in addition to the Old Town San Diego State Historic Park, the State of California through Caltrans also has jurisdiction of Interstates 5 and 8 serving the community.
- As mentioned in Caltrans’s comment letter to the City for the Otay Mesa CPU, please consider adding an acknowledgment where appropriate within the **Land Use and Noise Elements** that the California Air Resources Board (ARB) recommends as a guideline a buffer of 500 feet between residential uses and freeways.
- Thank you for including future collaboration with Caltrans throughout the documents, including in Policies 3.1.2 “to improve the pedestrian environment at freeway underpasses and pedestrian bridges,” and 3.1.3 “to facilitate the development of a bicycle and pedestrian connection from the Sports Arena Community Village to the San Diego River Park, which could include a bicycle and pedestrian bridge over or a tunnel under I-8” on page 48, **Circulation Element**.

As mentioned in Caltrans’s comment letter to the City for the Barrio Logan CPU, and discussed on 9/16, further coordination is needed between Caltrans and the City to determine if Caltrans R/W proposed as potential “Joint-Use Facilities” (e.g., Policy 8.1.11; pages 90-91, 94, **Recreation Element**) can be declared excess and sold to a third party, and if not, to pursue an airspace lease. Caltrans policy allows for transportation compatible uses within the airspace defined as “any property within right of way limits of an existing highway... that is capable of other development without undue interference with the operation and foreseeable

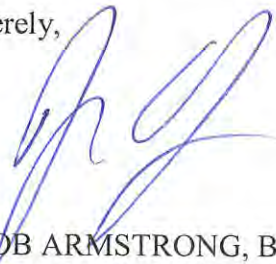


future expansion of the transportation corridor” and includes “area in cut or fill slopes” (Caltrans Right-of-Way Manual, Section 15.01.01.01). Furthermore, Marler-Johnson Park Agreements (Section 15.04.01.05) allows a local agency to request use of Caltrans airspace for park or recreational purposes; Marler-Johnson agreements may be offered for a period of ten years with five-year extensions.

In the Mission Valley Community Plan Update, it proposed changes to westbound off-ramp to Morena Boulevard. Existing off-ramp provides access to northbound Morena Boulevard. The Community Plan proposed a controlled intersection at Morena Boulevard accommodating access to both northbound and southbound Morena Boulevard. Caltrans concurs with the modeling of the proposed west-to-south access at I-8/Morena Boulevard to eastbound I-8, also be removed as part of the Mission Valley Community Plan Update. This ramp removal was originally proposed in the 1988 PSR, and the traffic benefits of removing this ramp remain viable. The Midway-Pacific Highway and Old Town San Diego Community Plan Updates need to reflect this proposed change as a future condition.

Caltrans appreciates the continued coordination with City staff and community representatives on this Plan. If you have any questions, please contact Kimberly Dodson at (619) 688-2510.

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Development Review Branch



# RINCON BAND OF LUISEÑO INDIANS

## Culture Committee

1 W. Tribal Road - Valley Center, California 92082 -  
(760) 297-2621 or (760) 297-2622 & Fax: (760) 749-8901



November 16, 2015

Susan Morrison  
The City of San Diego  
Planning Department  
1010 Second Avenue, MS 614C  
San Diego, CA 92101

**Re: Mid-Pacific Highway and Old Town San Diego Community Plan Updates Proj. 453425**

Dear Ms. Morrison:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Mid-Pacific Highway and Old Town San Diego Community Plan Update Project No. 453425. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent Whipple".

Vincent Whipple  
Manager  
Rincon Cultural Resources Department



December 1, 2015

Susan Morrison  
City of San Diego, Planning Department  
1010 Second Avenue, MS 614C  
San Diego, CA 92101  
Email: [PlanningCEQA@sandeigo.gov](mailto:PlanningCEQA@sandeigo.gov)

VIA EMAIL

**Subject: Comments on Notice of Preparation of a Program Environmental Impact Report for the Midway-Pacific Highway and Old Town San Diego Community Plan Updates**

Dear Ms. Morrison:

The San Diego Unified School District (District) has reviewed the Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the Pacific Highway-Midway and Old Town San Diego Community Plan Updates. The NOP describes the project as the update to two adjacent Community Plans, which will provide a long term comprehensive policy framework for growth and development in these communities and would serve as a basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. The District serves more than 120,000 students in pre-school through grade 12 and is the second largest district in California. We have more than 226 educational facilities within the City of San Diego. Our primary concern is any potential impacts the project would have to our existing facilities.

Within the Old Town Community the District owns and operates the Fremont Training Center located at 2375 Congress Street, San Diego, CA 92110. This site is utilized by the District for both administrative and educational programs. The District's on-line learning center is operated from this campus, thus students are present at regular intervals. The existing land use for this site according the 2011 Old Town Community Plan Update is Institutional. However, the Draft Community Plan Update identifies the proposed land use for the site as Mixed Commercial Residential – Medium (O-25 du/ac). The land used designation for this site should remain Institutional.

The District also owns and operates Dewey Elementary School located at 3251 Rosecrans Street, San Diego, CA 92110. The existing and proposed community plan land use for this site is Institutional. In addition, the District services the existing communities with other schools located outside of these communities in San Diego.

We agree with the recommended finding of the potential significant impacts of the proposed project identified in the NOP. Please consider the following when preparing the PEIR:

- If increased density is proposed within the communities, please address potential impacts to the schools that service the communities.
- Please address compatibility of the proposed land uses to a school site.
- Address potential traffic impacts and safety hazards. Would an increase in traffic impact our existing safe-route to school programs?

We appreciate the opportunity to provide comments on this NOP. Please make sure we are included on your distribution list to receive the Notice of Availability once the Draft PEIR is ready for review. Should you have any questions regarding this letter, please contact myself at (858) 637-6280 or [gstanford1@sandi.net](mailto:gstanford1@sandi.net).

Sincerely,



Gray Stanford  
Director Project Management

GS:KF



City of San Diego\_Old Town San Diego Community Plan [Draft]

Comments

Alexander D. Bevil, Historian II

California State Parks\_Southern Service Center

November 30-December 1, 2015

## 1.5 Historical Background

Page 5

Fourth Paragraph: The majority of building materials, particularly wood for lumber, came via the sea. The sentence: "... the first electric streetcar transit system debuted in San Diego, running from downtown to Old Town, and eventually expanding to Balboa Park" is confusing. It suggests that the streetcar system continued from Old Town to Balboa Park. Omit "and eventually expanding to Balboa Park."

According to topographic and Sanborn Insurance maps, residential, commercial and institutional development outside of the original core did not occur as a result of the San Diego and Old Town Railway and the expansion of the San Diego electric Railway into the area. Most of the building occurred with the completion of the Coast Highway in 1927 and the opening of the nearby Convair plant in 1935.

## 2.1 Historic Context

Page 12

Third Paragraph: "In 1542, Juan Rodrigues Cabrillo was among the first Europeans to arrive at ~~the~~ San Diego Bay." He did not arrive alone.

Vizcaíno was not on a "major scientific exploratory expedition." He was conducting a survey expedition along the Alta California coast to locate and chart safe harbors for returning Manila galleons.

"Further colonization" did not take place in 1769. Although Spain had formally claimed Alta California as part of its empire, it made no attempts to actually settle or "colonize" the area in order to dominate the surrounding land's natural and human resources until May-July 1769.

Page 13

"Mexican Period (1821-1846)

1<sup>st</sup> Paragraph

A large part of the land came from the former Spanish missions.

2<sup>nd</sup> Paragraph

I would also argue that attempts to Christianize the Native American Indians was greatly reduced during the Mexican Period.

Photograph at lower right:

The Casa de Estudillo is one the finest example of a restoration of a home built during the Mexican Period.

Page 14

American Period (1846-1970)

Why not 1846-Present, like written on page 15, paragraph 2?

It should be mentioned that San Diego County was California's first.

2<sup>nd</sup> Paragraph

The Derby Dike was rebuilt in 1877.

Page 15

Which new residences were constructed in the vicinity of the Old Town plaza?

Page 16

There is no mention of Frank Sessions' Nursery Sales Building on the corner of Mason Street and San Diego Avenue. Erected in 1929, its Spanish Colonial Revival-influenced design was Sessions and local architects Richard Requa and Herbert L. Jackson's collaborative attempt to introduce "Southern California style" buildings as infill to develop Old Town into a tourist attraction similar to Los Angeles' Olvera Street and Santa Barbara's Viejo Paseo district.

Page 18

Post-World War II (1946-1970)

Paragraph 2

Caltrans constructed a new headquarters on the site of the Old Mission Olive Works plant in 1953. Its design dates to 1951, but it wasn't completed until 1953. Subsequent wings were added along Calhoun and Juan Streets in 1959 and 1964, respectively.

## 2.2. Identification and Preservation of Historical Resources

Page 19

Paragraph 2

The community planning area also has an extensive historic occupation as the first Spanish Presidio and Mission settlements in Alta California.

The Casa de Bandini is actually associated with the American Transition Period. It is an 1860s remodeling (with a 2<sup>nd</sup> story addition) of the original adobe into the Cosmopolitan Hotel.

Page 20

The Automobile, Early Tourism and Preservation (1904-1939)

Paragraph 1



Again, I would include the Milton P. Sessions Nursery Sales Building as a representational example of a Spanish Eclectic style-influenced commercial building taking advantage of automobile traffic along San Diego Avenue during this time period.

Also, although greatly altered, the Casa de Pico Motor Hotel is another Requa and Herbert L Jackson-designed example from this period. It was designed and constructed specifically to cater to automobile tourists visiting Old Town's core and outlying historic and leisure-related recreational attractions.

Page 22

Theme: Post World War II (1946-1970)

First paragraph

To reiterate, Caltrans constructed a new headquarters on the site of the Old Mission Olive Works plant in 1953. Its design dates to 1951, but it wasn't completed until 1953. Subsequent wings were added along Calhoun and Juan Streets in 1959 and 1964, respectively. You should also mention it is eligible for listing because of its Post-war International architectural style and noted architect, Clarence J. Paderewski.

Page 27-29

The Chapel of the Immaculate Conception was originally located closer to the Catholic cemetery. It was relocated and restored at its current location between 1936 and 1937.

The Derby Dike Site

Only one member of the U.S. Army Corps of Engineers, Lt. Derby, was involved in directing local Indian laborers to construct the earthen dike.

Derby-Pendleton House

Lt. Derby did not build it. He rented the house from its owner, Juan Bandini. Bandini had purchased it from William Heath Davis in 1851. It was one of several pre-fabricated houses that Davis had shipped to San Diego from Maine as part of his failed New Town development.

Cobblestone Jail Site

My research has revealed that the jail actually stood on Lot 1 of Block 509. That would place it on the parcel on which the current William B. Kolender San Diego County Sheriff's Museum. 2384 San Diego Avenue, not 2360 San Diego Avenue.

Junípero Serra Museum was co-designed by William Templeton Johnson and Robert W. Snyder.

Figure 2-2: Designated Historic Resources

There is no identification site No. 36 next to the Casa de Lopez. Is it the present location of the Emmet House Site? There is no No. 6 (Emmet House Site) on the map. It would have been near resource no. 352.

Page 30

Table 2-2: Potentially Significant Historic Resources in Old Town

Why no mention of the 1951-1953 built Caltrans District 11 Office Building?

On page 22, the report states that it was determined eligible for [listing] on the California and National registers as a representative example of the post-war International style in San Diego.

Page 24-25

2.3 Educational Opportunities and Incentives

There is hardly any mention of cooperating with California State Parks by name to provide opportunities for education and interpretation of Old Town's diverse history, etc.

Page 40

2<sup>nd</sup> column, 2<sup>nd</sup> paragraph

There is no recognition of having to accommodate the elderly, handicapped, and/or groups of young children traveling from outside the Historic Core from Pacific Highway or the Transit Center. See: LU-4.4 and 4.6 below.

If you plan on reducing visitor-oriented vehicle traffic circulation for parking and improving pedestrian and bicycle connections to the Historic Core from the surrounding areas, what provisions will be made to park or store all these new bicycles?

In addition, there is no discussion of visitors using motorbikes, scooters, or other smaller personal transportation devices. Even today, none of the parking lots facilitate the parking of large numbers of these types of vehicles. For example, in a regular parking space, one medium or large-sized motorcycle carrying two people take the space of a vehicle that could carry from 2 or as many as 8 passengers.

Page 41

3.4 Historic Core Sub-District

LU-4.3

Support the reconstruction of buildings ~~including~~ from the Mexican and American Transitional periods. Support the removal of non-historic buildings and structures from within the historic core.

LU-4.4 and 4.6

If the surface parking is closed in order to enhance the pedestrian environment with the historic core, how are those with mobility difficulties accommodated? Perhaps this can be done by the introduction of historic period-appropriate horse and/or mule-drawn vehicles, and/or electric-powered vehicles resembling early 20<sup>th</sup> century automobiles.

LU-4.8

Encourage the use of period-appropriate native and historic plant material. Particularly in house gardens or huertas operated by volunteer garden groups or co-op urban farmer groups. Produce from these

gardens could be sold regularly in open stalls on the plaza, at nearby farmers markets, or distributed amongst the volunteers/co-op farmers.

#### LU-4.10

To support accessibility and connectivity between the historic core and the rest of the community, consider the following:

1. Eliminate automobile parking along San Diego Avenue.
2. Limit automobile traffic along the street between certain hours or certain holidays in order to convert it into a pedestrian mall.
3. On these days, line the streets with vendor stalls (Similar to what's being done along Midland Road in Old Poway Village and on Higuera Street in San Luis Obispo.
4. Extend the activity along San Diego Avenue into the State Park.

#### LU-4.11

Consider expanding the State Historic Park to incorporate all of the open space north of Juan Street to Jackson Street. That would add approximately 10 potentially significant historic archaeological sites associated with Old Town's 1821-1872 historic period. The majority of which were built in the earlier 1821-1848 Mexican period.

There is no discussion on preserving or removing the 1953-1964 Cal Trans Office Building complex. Much of the historic core's future development hinges on this decision.



City of San Diego\_Midway—Pacific Highway Community Plan and Local Coastal Program [Draft]  
Comments  
Alexander D. Bevil, Historian II  
California State Parks\_Southern Service Center  
December 2, 2015

My major concern is that Pacific Highway and the I-5 Freeway, as well as the trolley and train tracks literally shut off Old Town SHP from the majority of the Midway—Pacific Highway community.

In some aspect, that might be a blessing.

Currently, the area is a hodge-podge of big box retail stores, mini-malls, light industrial and service shops, gentlemen's clubs (strip joints), bars, and tattoo parlors.

As it stands now, most visitors to Old Town San Diego State Historic Park [OTSDSHP] do not venture beyond the park's boundaries much less cross Pacific Highway and enter the Midway Community via Taylor Street. The area is a hodge-podge of automobile-oriented businesses.

What the proposed Community Plan hopes to accomplish is basically converting the area's major automobile thoroughfares into boulevards similar to those in older European cities.

That being said, before creating corridor sidewalks along Taylor Street from the Midway Community into the Old Town Historic Core, there will have to be a quantum shift in the type of businesses currently lining that corridor.

Even if the area's major transportation corridors are more "pedestrian friendly," City leaders and administrators will have to initiate a radical shift in social norms. Unless gasoline prices once again soar past \$5 a gallon, you're not going to see people substitute their personal automobiles for public transportation, much less bicycles.

Regarding this matter, why this obsession with bicycles as the only form of alternate personal transportation? The use of bicycles and/or smaller 2 or 3-wheeled motorized vehicles would only be feasible over short distances; say, from Ocean Beach to the Old Town Intermodal Transportation Center (ITC) via Taylor Street. Once there, what provisions will be taken to park and store dozens if not hundreds of such vehicles? Particularly if, as the Old Town Community Plan suggests, the parking lots in OTSDSHP are relocated.

Finally, the interior of the Taylor Street freeway underpass will have to be well lit before pedestrians attempt to walk through it at night.

The introduction of a "Rapid Bus Route" along Sports Arena Boulevard and Taylor Street to the Old Town ITC would be a more realistic approach to move people to and from OTSDSHP.

Speaking of that, there is no discussion as in the 1987 Old Town Community Plan of the proposed extension of the Light Rail service north of the ITC across the San Diego River flood control channel to the northern communities of Clairemont and University City. The light rail extension would accommodate hundreds of Old Town visitors a day from these areas.

The Plan needs to be updated to recognize that the federal government has closed the Midway Post Office.

If, as the Plan proposes, the Dutch Flats Urban Village master plan is initiated, what provisions will be in place to attract and transport resident to OTSDSHP?

#### Historic Preservation Element

Regarding the significance of the La Playa Trail. I would argue that it is not the oldest European trail on the Pacific Coast, but one of the oldest. The Portolà Trail, which connected San Diego to Monterey, originated at the foot of Presidio Hill in 1769. It eventually went on to become El Camino Real, connecting Loreto, Baja California to Sonoma, Northern Alta California.

The La Playa Trail was an unofficial trail until Spanish ships regularly began unloading and taking on cargo to and from San Diego Mission after 1770.

Indeed, it really did not serve as a commercial trail until the mission was relocated inland from Presidio Hill in 1774.

George Derby did not direct the Army Corps of Engineers to construct "Derby's Dike." Derby directed a group of local Indian laborers to do so.

According to historic Sanborn Insurance, U.S. topographic maps, and a July 1940 article in *California Highways and Public Works*, MCRD had very little influence on development in the Dutch Flats area. It wasn't until the establishment of Convair along Pacific Highway that federally funded housing tracts began to be built along Barnett Avenue and in the Frontier area to the north.

Most of the built environment dates from after WWII.



Susan Morrison, Environmental Planner  
City of San Diego Planning Department  
1010 Second Avenue, MS614C  
San Diego, CA 92101

December 4, 2015

Via email: [PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

**Re: Project 453425 Midway-Pacific Highway and Old Town San Diego Community Plan Updates- Climate Action Campaign Comments**

Dear Ms. Morrison,

On behalf of Climate Action Campaign (CAC), please accept these scoping comments on the Midway-Pacific Highway and Old Town San Diego Community Plan Updates preparation of a Program Environmental Impact Report. CAC is a watchdog organization dedicated to stopping climate change and protecting San Diego's quality of life.

Our comments pertain primarily to ensuring the Plans and PEIR support and are consistent with the goals of state climate laws and the City's Climate Action Plan—which is likely to be adopted as city policy by the time the PEIR is complete—to reduce greenhouse gas emissions (GHGs), shift to 100% clean energy, increase and improve transit and mobility, eliminate waste, and increase tree coverage.

**Project Objectives**

CAC suggests the project objectives should include the following:

- Reduce greenhouse gas emissions consistent with and supportive of the goals of the City's Climate Action Plan and state climate laws, including Executive Orders B-30-15 (reduce GHG emissions by 40% below 1990 levels by the year 2035) and S-3-05 (reduce GHG emissions by 80% below 1990 levels by 2050).
- Support and achieve consistency with the goals of the City's Climate Action Plan to shift to 100% clean energy; increase and improve transit and mobility so 50% of commuters in transit priority areas will use alternative and active transit; increase tree coverage to 35%; eliminate waste; and support social equity and quality jobs.

**Greenhouse Gas Emissions**

The PEIR should analyze if the project would reduce greenhouse gas emissions consistent with and supportive of the goals of the City's Climate Action Plan (reduce GHGs 50% below 2010 levels by 2035) and state climate laws, including Executive Orders B-30-15 (reduce GHG emissions by 40% below 1990 levels by the year 2035) and S-3-05 (reduce GHG emissions by 80% below 1990 levels by 2050).

**Land Use and Transportation/Traffic**

The PEIR should analyze the project's consistency with the goals of the City's Climate Action Plan to increase and improve transit and mobility to achieve 50% of commuters in transit priority areas using alternative and active transit by 2035, as well as support social equity and quality jobs. Rather than outdated "level of service" measurements for car and truck traffic, success should be measured in terms of share of commuters using transit, walking and biking; improved access via alternative transit to jobs and other community needs; and reduced Vehicle Miles Travelled.

**Population and Housing**

The PEIR should analyze the project’s consistency with the Climate Action Plan’s goals for social equity and support for affordable, appropriately sited, transit-oriented housing to ensure that all San Diegans in transit-priority areas can access convenient, affordable, and safe transit, walking, and biking opportunities and that low-income populations will not be displaced.

**Biological Resources**

The PEIR should analyze the project’s consistency with the Climate Action Plan’s goals to increase urban tree coverage to 35%, in order to provide shading, reduce the need for energy-intensive cooling technologies, and sequester carbon dioxide. The PEIR should also analyze water needs and impacts associated with this.

**Human Health, Public Safety, Hazardous Materials**

The PEIR should analyze the potential impacts of rising sea levels and storm surge that may cause the project to disrupt human health, infrastructure, and public safety. The PEIR should also analyze the project’s ability to improve public safety and human health with safer active transportation infrastructure (bicycling and pedestrian facilities), reduced greenhouse gas pollution, and improved air quality.

**Public Services and Facilities**

The PEIR should analyze the adequacy of public facilities to serve as cooling locations for public access during heat events, which are expected to become more common as climate change becomes more pronounced.

**Energy**

The PEIR should analyze the project’s consistency with the goals of the Climate Action Plan to achieve 100% clean energy by 2035, support local solar, and improve energy efficiency and conservation.

Thank you for the opportunity to submit these comments. We look forward to working with the City further to ensure all Community Plan Updates moving forward support the Climate Action Plan.

Sincerely,



Nicole Capretz  
Executive Director  
[nicole@climateactioncampaign.org](mailto:nicole@climateactioncampaign.org)



Kayla Race  
Director of Operations and Programs  
[kayla@climateactioncampaign.org](mailto:kayla@climateactioncampaign.org)





# San Diego County Archaeological Society, Inc.

Environmental Review Committee

5 December 2015

To: Ms. Susan Morrison, Environmental Planner  
Planning Department  
City of San Diego  
1010 Second Avenue, Mail Station 614C  
San Diego, California 92101

Subject: Notice of Preparation of a Draft Program Environmental Impact Report  
Midway-Pacific Highway and Old Town San Diego  
Community Plan Updates  
Project No. 453425


Dear Ms. Morrison:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

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

Sincerely,

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

cc: SDCAS President  
File



**PALA TRIBAL HISTORIC  
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road  
Pala, CA 92059  
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Susan Morrison  
City of San Diego, Planning Dept.  
1222 First Ave, MS 413  
San Diego, CA 92101

Re: Midway-Pacific Highway and Old Town San Diego Community Plan Updates

Dear Mrs. Morrison:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at [sgaughen@palatribe.com](mailto:sgaughen@palatribe.com).

Sincerely,

Shasta C. Gaughen, PhD  
Tribal Historic Preservation Officer  
Pala Band of Mission Indians

**ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO SHASTA C. GAUGHEN AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.**

