

Final Program Environmental Impact Report

SCH No. 2017071007 - Project No. 586601



November 2018

Prepared for:
City of San Diego
Planning Department
9485 Aero Drive
San Diego, CA 92123

BALBOA AVENUE STATION AREA SPECIFIC PLAN

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2017071007

PROJECT No. 586601

NOVEMBER 2018

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City of San Diego
Planning Department
9485 Aero Drive
San Diego, CA 92123

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Project No. 586601
SCH No. 2017071007

SUBJECT: BALBOA AVENUE STATION AREA SPECIFIC PLAN

Applicant: City of San Diego Planning Department

FINAL DOCUMENT – NOVEMBER 16, 2018:

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

PROJECT DESCRIPTION:

The proposed Balboa Avenue Station Area Specific Plan (BASASP) would increase residential density by redesignating and rezoning lands to allow for transit-oriented development adjacent to the Balboa Avenue trolley station. The BASASP would require an amendment to the Pacific Beach Community Plan/Local Coastal Program and Clairemont Mesa Community Plan to include revised figures and text to be consistent with the BASASP. ~~The proposed BASASP would require an amendment to the Pacific Beach Community Plan/Local Coastal Program.~~ The proposed BASASP provides policies and recommendations for new residential and mixed-use development and improvements to the public right-of-way to enhance access to the Balboa Avenue trolley station that would capitalize on the new regional transit connection in the area. The proposed BASASP promotes increasing transportation choices, decreasing dependence on single occupancy vehicles, and addressing traffic congestion at local intersections and roadways.

Within the Pacific Beach community, the BASASP proposes the following land use and zoning changes:

- Approximately 13 acres of property designated for commercial use would be redesignated to the Community Village land use designation, allowing up to 109 Dwelling Units per Acre (DU/AC). These properties would be rezoned to the RM-4-10 zone;
- Approximately 7 acres of property designated for commercial use would be redesignated to the Community Village land use designation, allowing up to 109 DU/AC. These properties would be rezoned to the CC-3-9 zone;
- Approximately 70 acres of property designated for commercial use would be redesignated to the Community Village land use designation, allowing up to 73 DU/AC. These properties would be rezoned to the CC-3-8 zone;
- Approximately 28 acres of property designated for multifamily residential use would be redesignated to allow up to 54 DU/AC. These properties would be rezoned to the RM-3-8 zone.

The Community Village land use designation would allow for the development of high density multi-family housing in a mixed-use setting as well as commercial, service, and civic uses. The BASASP would not redesignate or rezone any property within the Clairemont Mesa planning area. The proposed BASASP would redesignate approximately 51 acres of Commercial land uses to the Community Village land use designation within the Pacific Beach community. The Community Village land use designation would allow for the development of high density multi-family housing in a mixed-use setting and commercial, service, and civic uses. The proposed BASASP would also identify multi-modal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue trolley station.

The Balboa Avenue Station Area Specific Plan can be found on the Planning Department's website at:

<https://www.sandiego.gov/planning/community/specificplans/balboa-station>

PROJECT LOCATION:

The project site encompasses approximately 210 acres (0.33 square miles) and is located in the Pacific Beach and Clairemont Mesa communities of the City of San Diego. Rose Creek borders the western part of the project site. Interstate 5 runs north-south through the middle of the project site and is the boundary between the Pacific Beach community planning area on the west side and the Clairemont Mesa community planning area on the east side.

ENVIRONMENTAL DETERMINATION:

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

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

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Air Quality (Conformance to the Regional Air Quality Strategy, Conformance to Federal and State Ambient Air Quality Standards, Cumulatively Considerable Net Increase of Criteria Pollutants), Historical and Tribal Cultural Resources (Historic Resources, Archaeological Resources, and Tribal Cultural Resources), Noise (Excessive Ground-borne Vibration, Construction Noise), Paleontological Resources (Ministerial Development), and Transportation/Circulation (Vehicular Traffic Circulation)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

RESULTS OF PUBLIC REVIEW:

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



Alyssa Muto, Deputy Director
Planning Department

11/16/2018
Date of Final Report

Analyst: Rebecca Malone, AICP

PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL GOVERNMENT

U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. 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)
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 & 51B)
Native American Heritage Commission (56)

COUNTY OF SAN DIEGO

Air Pollution Control District (65)
County Water Authority (73)
Department of Environmental Health (76)

CITY OF SAN DIEGO

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

Office of the City Attorney

Keely Halsey, Deputy City Attorney

Planning Department

Mike Hansen, Director
Tom Tomlinson, Assistant Director
Alyssa Muto, Deputy Director
Laura Black, Deputy Director
Tait Galloway, Program Manager
Michael Prinz, Senior Planner
Rebecca Malone, Senior Planner

Planning Department, cont.

Elena Pascual, Junior Planner
George Ghossain, Senior Traffic Engineer
Claudia Brizuela, Associate Traffic Engineer
Pedro Valera, Assistant Traffic Engineer
Myra Herrmann, Senior Planner
Susan Morrison, Associate Planner
Sara Osborn, Senior Planner
Kristen Forburger, Senior Planner – MSCP
Robin Shifflet, Development Project Manager III – Park Planning
Shannon Scoggins, Park Designer – Park Planning
Kelley Stanco, Senior Planner – Historic Resources
Velina Hamilton, Associate Management Analyst

Development Services Department

Kerry Santoro, Deputy Director
PJ Fitzgerald, Assistant Deputy Director
Peter Kann, Development Project Manager I
Mehdi Rastakhiz, Associate Engineer – Civil
James Quinn, Senior Engineer Geologist
Brian Panther, Solid Waste Inspector III – Local Enforcement

Environmental Services Department

Lisa Wood, Senior Planner

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal

Police Department

Michael Miranda, Sergeant
Jason Zdunich, Police Officer II

Public Utilities Department

George Adrian, Program Manager
Khuram Shah, Associate Engineer – Civil
Shelby Gilmartin, Assistant Engineer – Civil

Transportation & Storm Water Department

Victoria Kalkirtz, Senior Planner
Mark Stephens, Associate Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

Libraries

Central Library, Government Documents (81 & 81A)
Balboa Branch Library (81B)
Clairemont Branch Library (81H)
North Clairemont Branch Library (81S)
Pacific Beach/Taylor Branch Library (81X)

City Advisory Boards or Committees

Historical Resources Board (87)

Other City Governments

San Diego Association of Governments (108)

Metropolitan Transit System (112/115)

San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (132)

Community Planning Groups or Committees

Clairemont Mesa Planning Group (248)

Pacific Beach Planning Group (375)

Community Councils

Clairemont Town Council (257)

Pacific Beach Town Council (374)

Other Agencies, Organizations and Individuals

The San Diego River Park Foundation (163)

San Diego River Coalition (164)

Sierra Club San Diego Chapter (165)

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)

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 Archaeological Center (212)

Save Our Heritage Organisation (214)

Clint Linton (215B)

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

Campo Band of Mission Indians (217)

San Diego County Archaeological Society Inc. (218)

Kuumeyaay Cultural Heritage Preservation (223)

Kuumeyaay Cultural Repatriation Committee (225)

Native American Distribution

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

Campo Band of Mission Indians (225B)

Ewiiapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)

Viejas Group of Capitan Grande Band of Mission Indians (225I)

Mesa Grande Band of Mission Indians (225J)

San Pasqual Band of Mission Indians (225K)

Ipai Nation of Santa Ysabel (225L)
La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (225O)
Pechanga Band of Mission Indians (225P)
Rincon Band of Luiseno Indians (225Q)
San Luis Rey Band of Luiseno Indians (225R)
Los Coyotes Band of Mission Indians (225S)
Beach and Bay Press (372)
Robert Lee Buck
Carolyn Chase
Scott Chipman
Vanessa De La Rosa
Grant Freeman
Ed Gallagher
Don Gross
Roy Hughes
Bill Jencks
Kathy Keehan
Robert Leone
Robert Little
Irene Magallanez
Karen McLaughlin
Billy Paul
Janet Podney
Steve and Judy Pruett
Karl Rand
Donna Regalado
Joe Steinbach
Peter Ward
Karin Zirk

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Balboa Avenue Station Area Specific Plan

Program Environmental Impact Report

Comment Letters and Responses

According to the California Environmental Quality Act (CEQA) Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This section provides responses to written environmental comments received during the 61-day public review period for the Draft Program Environmental Impact Report (Draft PEIR) that started April 13, 2018 and ended June 12, 2018. A total of 46 comment letters were received during the review period.

Comment letters for the Draft PEIR were received from the following public agencies, organizations, and individuals that provided comments during the review period (Table 1). Several comment letters received during the Draft PEIR public review period contained accepted revisions that resulted in changes to the Final Program Environmental Impact Report (Final PEIR) text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. Many comments do not pertain to the adequacy of analysis in the Draft PEIR or to other aspects pertinent to the potential effects of the proposed Balboa Avenue Station Area Specific Plan on the environment pursuant to CEQA. Often, these comments refer to aspects of the Specific Plan. Responses are generally provided to these comments and/or a citation is provided to the *Balboa Avenue Station Area Specific Plan Public Comment Summary*. However, it is noted here for the public record that such comments are not in the purview of the Draft PEIR or CEQA.

Table 1
List of Commenting Agencies, Organizations, and Individuals

Letter	Commenter	Date
A	State Clearinghouse	June 13, 2018
B	Jo Powers	April 19, 2018
C	Summer Brooks	April 19, 2018
D	Emily Bernardo	April 19, 2018
E	Jay Campbell	April 20, 2018
F	Lisa Maier	April 20, 2018
G	Alex Scheingross	April 20, 2018
H	Diane Hoskins	April 22, 2018
I	Samantha Ollinger	April 23, 2018
J	Sharon Thursby	April 25, 2018
K	Viejas Band of Kumeyaay Indians	April 25, 2018
L	David Gonzales	May 11, 2018
M	Patricia Vreeland	May 11, 2018
N	Robert Little	May 14, 2018
O	Eddie Bradford	May 15, 2018
P	Genie Lerch-Davis	May 15, 2018

Table 1 (cont.)
List of Commenting Agencies, Organizations, and Individuals

Letter	Commenter	Date
Q	Rich Ernst	May 16, 2018
R	Christine Boulton-Hunyady	May 17, 2018
S	Melanie Nelson	May 19, 2018
T	Dalton	May 19, 2018
U	California Department of Toxic Substances Control	May 21, 2018
V	Maria Trapasso	May 22, 2018
W	Candy Cumming	May 23, 2018
X	Save Our Heritage Organisation	May 23, 2018
Y	San Diego County Archaeological Society	May 23, 2018
Z	Rodger J. Gredvig	May 25, 2018
AA	Stephanie Pfaff	May 25, 2018
AB	Craig Rolain	May 28, 2018
AC	Wayne Konopaske	May 28, 2018
AD	San Diego Association of Governments	May 29, 2018
AE	George Henderson	May 29, 2018
AF	William Merrill	May 29, 2018
AG	Pacific Beach Planning Group	June 8, 2018
AH	Carolyn Chase	June 11, 2018
AI	Clairemont Community Planning Group	June 11, 2018
AJ	Environmental Center of San Diego	June 11, 2018
AK	Carolyn Chase	June 12, 2018
AL	California Native Plant Society	June 12, 2018
AM	Friends of Rose Creek	June 12, 2018
AN	Karin Zirk	June 12, 2018
AO	Concerned Clairemont Citizens	June 12, 2018
AP	Sustainability Matters	June 12, 2018
AQ	Jeff Kucharski	June 12, 2018
AR	Nicole Burgess	June 12, 2018
AS	Beautiful PB	June 12, 2018
AT	Donna Regalado	June 12, 2018



EDMUND G. BROWN JR.
GOVERNOR

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



KIM ALEX
DIRECTOR

June 13, 2018

Rebecca Malone
City of San Diego
9485 Aero Dr, MS 413
San Diego, CA 92123

Subject: Balboa Avenue Station Area Specific Plan EIR
SCH#: 2017071007

Dear Rebecca Malone:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 12, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,


Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

A-1 This comment letter confirms receipt and distribution of the Draft Program Environmental Impact Report and project compliance with State Clearinghouse requirements. No further response is required.

A-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017071007
Project Title Balboa Avenue Station Area Specific Plan EIR
Lead Agency San Diego, City of

Type EIR Draft EIR
Description Note: Extended Review Per Lead

The proposed Balboa Ave Station Area SP would increase residential density by redesignating and rezoning lands to allow for transit-oriented development adjacent to the Balboa Ave trolley station. The proposed BASASP would require an amendment to the Pacific Beach Community Plan/Local Coastal Program. The proposed BASASP provides policies and recommendations for new residential and mixed use development and improvements to the public ROW to enhance access to the Balboa Ave trolley station that would capitalize on the new regional transit connection in the area. The proposed BASASP promotes increasing transportation choices, decreasing dependence on single occupancy vehicles, and addressing traffic congestion at local intersections and roadways.

Lead Agency Contact

Name Rebecca Malone
Agency City of San Diego
Phone (619) 446-5371 **Fax**
email
Address 9485 Aero Dr, MS 413
City San Diego **State** CA **Zip** 92123

Project Location

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

Proximity to:

Highways
Airports
Railways ATSF, Amtrack, Coaster, SD Trol
Waterways Tecolote Creek, Mission Bay, San Diego River
Schools San Diego USD
Land Use

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

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; Caltrans, District 11; Office of Emergency Services, California; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission; San Diego River Conservancy; Department of Toxic Substances Control

Date Received 04/13/2018 **Start of Review** 04/13/2018 **End of Review** 06/12/2018

Note: Blanks in data fields result from insufficient information provided by lead agency

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COMMENTS

RESPONSES

From: Jo Powers <mimi.powers1@gmail.com>
Sent: Thursday, April 19, 2018 3:23 PM
To: PLN_PlanningCEQA
Cc: jimlamatter@gmail.com; Chris O'Connell
Subject: Objections to plan for new 4,700+units at Balboa Station

Dear Planning Commission:

Do you have San Diego's future at heart? What are you thinking about approving 4,729 new units at or near the Balboa Station?
 You must be nuts! The PB and Mission Bay/Morena area is already congested with some of the most accident prone intersections e.g., W. Mission Bay Drive and Balboa Ave. Do you want lawsuits on your hands with a multitude of future accidents?

Please consider scaling down this number. We are not L.A. yet. Do you want us to be another L.A. with traffic jams, pollutions, crime, overbuilding, etc.? Be wise, take the citizens' interest to heart and forget about the big developers.

Please cut the number of units to 500. This will still impact the area, but we also understand we need more housing. Let's be reasonable!

What do you foresee when the Big Earthquake hits? Will we see 100's of thousands of deaths due to poor City Planning? Do you want this on your conscience? Overbuilding and sink holes—can our infrastructure take this plan to building 4,729 units?

Let's be smart, be flexible, be wise, and cut your housing numbers please to 500 or definitely no more than 1,000 units.

Thank you for listening.

Sincerely,

Jo Powers
 San Diego 92117

B-1

B-2

B-1 Section 5.15, *Transportation/Circulation*, of the Program Environmental Impact Report (PEIR) addresses the existing conditions at the Balboa Avenue Station Area Specific Plan (BASASP) area intersections, roadway segments, and freeways, as well as conditions for these facilities at buildout of the proposed BASASP. Section 5.15.6 analyses the impact of the proposed BASASP on the vehicular circulation of the BASASP area. This section acknowledges multiple impacts to BASASP area intersections, roadway segments, and freeway segments. This section lists mitigation measures identified in the Traffic Impact Study (TIS) and identifies which ones are proposed as part of the BASASP. The Statement of Overriding Considerations includes a discussion of why certain mitigation measures were rejected. Section 5.15 fully analyzed a full buildout that would include 4,729 dwelling units (with an associated 28,380 trips).

Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities and proposed mobility improvements in the BASASP area.

B-2 Section 5.5, *Geology and Soils*, of the PEIR includes discussions of seismic-related fault rupture, ground-shaking and -lurching, seismic settlement, and geologic stability. The analysis, based on a geotechnical study (Appendix D to the PEIR), concluded that with conformance to applicable regulatory/industry standard and codes, impacts would be less than significant and no mitigation is required.

COMMENTS

RESPONSES

From: chica_san_diego <chica_san_diego@yahoo.com>
Sent: Thursday, April 19, 2018 3:32 PM
To: PLN_PlanningCEQA
Subject: Balboa Trolley Area Plan

Hello,

I am writing to express my great concern about adding over 4,000 residential dwelling units in the Balboa Trolley Plan area. I live in Clairemont and work in Pacific Beach. I travel down Balboa Ave. and Grand Ave. on a daily basis. These streets are already incredibly busy at commute times, I cannot even imagine the traffic back-up once thousands of residential units are added.

I ask that the planning group for this project PLEASE both travel both East and West on this route between 8 and 8:30 a.m., and between 4:30 to 5:30 p.m. to witness the traffic pattern. In the morning, the traffic going West at the Mission Bay Drive/ Garnet Ave. intersection can be backed up before Moraga Ave. Also, people going East on Balboa/Garnet that are turning on to Mission Bay Drive to get on the I-5 regularly back up into the intersection so that the through traffic going West is stalled. The traffic coming out of Pacific Beach on Grand/Balboa is also almost a mile long in the morning.

In the evening, the traffic on Balboa Ave. going into Pacific Beach is also backed up before Moraga Ave. A normally 12-minute commute from Clairemont Dr. to Mission Blvd. can take 50 minutes at 5 pm. And I regularly sit in 20+ minutes of traffic going East on Balboa just from Morena Blvd. to Clairemont Dr. (this is less than one mile!!!) It is bumper-to-bumper, and moves at a snail's pace. How in the world can the roads handle 4,000+ more residents?!?!? This traffic will bleed onto the I-5 (because people will be stopped coming off the Balboa off-ramp,) and make the Mission Bay Drive/Garnet Ave. intersection even more of a nightmare than it already is.

PLEASE PLEASE PLEASE empathize with the residents of this area, and witness the traffic patterns yourself. Ask yourselves if this is the kind of traffic you would want to experience on a daily basis on regular streets. I am not against *some* increase in density along the trolley route, but ruining the quality of life for everyone in the area with thousands of new units sounds like a nightmare.

Thank you for your time,

Summer Brooks
Clairemont resident

C-1 Please see Response B-1.

C-1

COMMENTS

RESPONSES

From: Emily Bernardo <emybernardo@yahoo.com>
Sent: Thursday, April 19, 2018 3:44 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No. 2017071007

D-1

Hello, I am writing to voice my concerns regarding the potential of adding 4,729 new units at Balboa Station. I live off of Moraga Blvd and battle the nightly rush hour commute along I-5 south. Out of the last 15 years of making this commute, something has significantly changed over the past 12 months. We now see significant backups along the exit ramp from 52 east to Clairemont Mesa/Regents continuing up the road w/ solid backup. Cars are cutting through down Jutland to Morena and over Moraga down to Balboa. It's an absolute nightmare that is a completely new phenomenon. I can't even imagine what a nightmare the traffic will be for everyone involved with the addition of 4729 units.

D-2

I realize that we need more housing and I do not want to be a NIMBY but some consideration must go into traffic planning for the surrounding area and neighborhood streets. I suggest stop signs and speed humps on Moraga as a start. The only thing that the trolley station is going to bring to our neighborhood is more crime and homeless people. Not looking forward to these changes. We should be building more car lanes and stop all this nonsense with the Trolley. I hear the bums have already made it to USCD. This is going to make it easier. The fancy UTC mall that is undergoing remodel is going to become a bum hangout too. I hope I'm wrong, but I wouldn't bet against it!

Kind regards,

Emily Bernardo
La Crosse Ave, San Diego 92117

D-1 Please see Response B-1.

D-2 The Balboa Avenue Trolley Station is a component of the approved Mid-Coast Corridor Transit Project currently under construction. Development and operation of the approved trolley station will occur whether the Balboa Avenue Station Area Specific Plan is approved or not. There is no analysis or evidence supporting the comment that crime and the potential for homeless occupation would increase because of the trolley station. This assertion is speculative and the California Environmental Quality Act (CEQA) does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145.

COMMENTS

RESPONSES

From: Jay Campbell <Jay@miramaroffice.com>
Sent: Friday, April 20, 2018 7:03 AM
To: PLN_PlanningCEQA
Subject: PROJECT NAME: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No. 2017071007

Hello,

E-1



It's a horrible idea to put that many units in the proposed area. It already is a good part of my commute getting off the south bound ramp.

Jay

E-1

Please see Response B-1 and the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities in the BASASP area.

COMMENTS

RESPONSES

From: Lisa Maier <maier.lisa@gmail.com>
Sent: Friday, April 20, 2018 7:36 AM
To: PLN_PlanningCEQA
Subject: 586601 / SCH No. 2017071007

F-1

No comments on the DEIR. Wanted to express support for increased density in this SP area. I don't want the aging population of Clairemont, and a majority of the people who have the time to speak to this issue, to be the only voices heard. San Diego (like all of CA) needs housing, affordable units near our transportation centers.

Thanks!

Lisa

F-1 The City acknowledges this comment in support of the project.

COMMENTS

RESPONSES

From: scheingross@gmail.com on behalf of Alex Scheingross <alex@scheingrosslaw.com>
Sent: Friday, April 20, 2018 10:55 AM
To: PLN_PlanningCEQA
Subject: Balboa Station

Sirs/Madams:

I am a resident of Bay Park, I work there and walk to work. I am incredulous that you believe 4729 units would fit into the area you describe. Up until 4 years ago I used to take the freeway home and got off at I-5 South at Balboa. It was a daily nightmare. I am sure it's no better now. In fact driving from La Jolla to downtown during evening rush hour is undergoing torture. I can assure you that though you believe everyone in the area will use the trolley, that's not going to be the case. Too many people still want to use their own car and the trolley does not go everywhere people have jobs. There was no bus service for well more than a mile around my old Carmel Valley office. This project will also make the intersection of Balboa and Mission Bay Dr, totally impassable as well as put a strain on all the surrounding streets, and PB in general.

I understand that we need additional housing and **lots of it**. I wonder in amazement how people can pay \$1800/month in rent for a two bedroom apt. I am worried about where my grandchildren will live. However 4729 units is way more than the area can handle. I don't have any specific research on what the optimal number of additional units would be, plus a factor to start to catch up to our housing needs, but it seems like less than a quarter of your number would significantly impact the area, but be tolerable to those of us *who understand* the desperate need for more housing.

G-1 Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities and proposed mobility improvements in the BASASP area.

G-2

I would also object to anything more than 2-3 story high buildings. It would significantly affect the aesthetics of the neighborhood.

Alex Scheingross

[Selected Member Super Lawyers](#)
www.scheingrosslaw.com
Law Offices Of Alex B. Scheingross
3772 Clairemont Dr.
San Diego, CA 92117
Phone 858 792 5988
Fax 858 581 1766

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G-2 As noted in Section 5.1, *Land Use*, of the Program Environmental Impact Report (PEIR), the southwestern portion of the Balboa Avenue Station Area Specific Plan (BASASP) area (south of Garnet Avenue and west of Interstate 5 [I-5]) is located in the Coastal Zone (refer to Figure 5.3-2 in the PEIR), and the western portion of the BASASP area (west of I-5) is located within the Coastal Height Limit Overlay Zone. All of the areas proposed to be re-designated as Community Village would be located within this portion of the BASASP area that is within the Coastal Zone and/or Coastal Height Limit Overlay Zone. Future development pursuant to the BASASP within the Coastal Zone and/or Coastal Height Limit Overlay Zone would be subject to a height limit of 30 feet. Additionally, as discussed in Section 5.16, *Visual Effects and Neighborhood Character*, of the PEIR, future development would be required to comply with land use and urban design policies contained within the BASASP that would ensure implementation of the BASASP would not negatively affect the character of the neighborhood.

COMMENTS

RESPONSES

H-1

From: diane12751@aol.com
Sent: Sunday, April 22, 2018 1:35 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No. 2017071007

I can't believe that you would be considering such a high density project at this location. Your report says the traffic, noise and pollution are minimal. I beg to differ. I have lived in this area for over 30 years and the traffic is gridlocked many times of the day. I suppose you assume that everyone will be taking the trolley or buses. that is a very big assumption. I believe it also reckless to build projects that exceed height limits so close to the Mission Bay area.

Please count my comments as a big NO for this project.

Diane Hoskins
3011 Chicago St.
San Diego, CA 92117

H-1

Please see Response B-1 regarding traffic and the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding residential densities in the BASASP area. With respect to potential noise impacts, Section 5.10, *Noise*, of the Program Environmental Impact Report (PEIR) identifies potentially significant noise impacts related to compatibility with City noise guidelines and mitigation (NOI-1) to reduce potential impacts to below a level of significance. The PEIR also identifies potentially significant noise impacts related to vibration and construction noise. Mitigation is identified to reduce such impacts (NOI-2, NOI-3, and NOI-4), but because it cannot be determined whether the identified mitigation would reduce vibration and construction-related noise impacts to below a level of significance at the program level, such impacts are assessed as significant and unavoidable. Site-specific studies will be required of future development proposals implemented under the Balboa Avenue Station Area Specific Plan (BASASP).

Similarly, Section 5.2, *Air Quality*, analyzes potential air quality impacts of the BASASP and identifies potentially significant air quality impacts and mitigation to reduce such impacts (AQ-1 through AQ-4). As with noise impacts, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes air quality impacts are significant and unavoidable.

The Traffic Impact Study prepared for the project was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual, including travel mode splits and allowable trip reductions for projects near transit stations. As part of the traffic analysis, a travel demand model was used to forecast volumes for different modes of travel. For the proposed project, the analysis was conducted with approximately 10 percent of trips using transit. The majority of the remaining trips were other vehicles. The analyses performed in the study reflect current and projected travel by mode using travel demand modeling specific to the area.

Please see Response G-2 regarding height limits.

COMMENTS

RESPONSES

From: Samantha S. Ollinger <sollinger@gmail.com>
Sent: Monday, April 23, 2018 8:36 AM
To: PLN_PlanningCEQA
Subject: 4729 Units at Balboa Trolley Area

Good morning,

I support building more units (or 4729 Units) at Balboa Trolley Area per this document:
http://www.balboastationplan.org/draft_program_eir

Sincerely,

--
- *Samantha Ollinger*

I-1 The City acknowledges this comment in support of the project.

COMMENTS

RESPONSES

J-1

From: Sharon Thursby <sharonathursby@gmail.com>
Sent: Wednesday, April 25, 2018 1:18 PM
To: PLN_PlanningCEQA
Subject: Balboa building

I am so upset that you would be considering building more density housing units in the Balboa area. Our roads in the area are already becoming packed and gridlocked throughout the day. And this would make it much worse! Our pleasant bay/beach community is quickly becoming over-crowded and undesirable to live in. I vote NO to this new building project!

Sharon Thursby
3015 Chicago St.
S.D.,CA. 92117

J-1

Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities in the BASASP area.



P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194453337
viejas.com

April 25, 2018

Rebecca Malone
Environmental Planner
City of San Diego Planning Dept.
9485 Aero Drive, MS 413
San Diego, CA 92123

RE: Balboa Avenue Station Area Specific Plan

Dear Ms. Malone,

In reviewing the above referenced project the Viejas Band of Kumeyaay Indians ("Viejas") would like to comment at this time.

The project area may contain many sacred sites to the Kumeyaay people. We request that these sacred sites be avoided with adequate buffer zones.

Additionally, Viejas is requesting, as appropriate, the following:

- All NEPA/CEQA/NAGPRA laws be followed
- Immediately contact Viejas on any changes or inadvertent discoveries.

Thank you for your collaboration and support in preserving our Tribal cultural resources. I look forward to hearing from you. Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314, or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

K-1 The Program Environmental Impact Report (PEIR) acknowledges in Section 5.7, *Historical and Tribal Cultural Resources*, that the Balboa Avenue Station Area Specific Plan (BASASP) area is located within the traditional territory of the Kumeyaay people and the BASASP area west of Interstate 5 is within the known Kumeyaay village site of La Rinconada de Jamo. Accordingly, the PEIR identifies a potentially significant impact associated with future development within or in proximity to this resource. Mitigation is identified to minimize impacts to tribal cultural resources (HIST-2), however, as the feasibility and efficacy of mitigation to any potential tribal cultural impacts cannot be determined at this program-level of analysis, impacts to tribal cultural resources would remain significant and unavoidable.

K-2 As identified in Section 5.7.2 of the PEIR, the project is subject to applicable federal, state, and local laws and regulations. The mitigation identified in the PEIR for archaeological and tribal cultural resources (HIST-2) includes provisions for inadvertent discovery of resources. It also requires the City to initiate consultation with tribal representatives where a recorded archaeological or tribal cultural resource is identified for subsequent development projects implemented under the BASASP.

COMMENTS

RESPONSES

L-1

From: David Gonzales <davidskigonzales34@gmail.com>
Sent: Friday, May 11, 2018 1:56 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan Project No.586601/SCH No.2017071007

More units? What about infrastructure?What is height limit?

L-1

The Balboa Avenue Station Area Specific Plan (BASASP) would allow for up to 4,729 additional units. The Program Environmental Impact Report for the BASASP analyzes potential impacts to infrastructure and public utilities (Section 5.14), which concludes that impacts related to water supply, utilities, solid waste management, and energy consumption would be less than significant. Please see Response B-1 regarding infrastructure related to roadways and Response G-2 regarding height limits.

COMMENTS

RESPONSES

From: patvreeland@aol.com
Sent: Friday, May 11, 2018 3:48 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan /No. 586601

M-1

I am sure there are many factors to consider in this project, but I need to report to you the observations of a long-time resident of the area (I live in Bay Park, off Clairemont Dr.). Coming from the east, Balboa Avenue is the only thoroughfare for driving into Pacific Beach and La Jolla from anywhere in the Clairemont area, and even under current conditions. I have waited in traffic for an hour on Balboa waiting to cross Mission Bay Drive in the afternoon. Further, coming from the north, Mission Bay Drive/Balboa Ave exit is backed up for miles on Highway 5 in the afternoon.

Adding thousands of people to what is *already* a problematic area borders on the absurd. Do you intend to make the future residents sign a pledge *never* to drive a car? Even then, we'd still have the *existing* problems. PLEASE look at the traffic patterns and counts in this area.

I am a fan of public transport, but realistically, there are times when one needs to *drive* to Pacific Beach. I cannot imagine how horrendous approaching the E Mission Bay Dr/ Balboa Avenue intersection, either from the east or the north, will be if you add 1,221 units under the current plan – much less the proposed 4,729 units. The conceptual rendering that I saw in BayParkConnection is ridiculous. No matter how many lines you put on the street, adding *thousands more people* is not going to make a major intersection into a quaint village scene.

Sincerely,
Patricia Vreeland
5048 August St.
San Diego, CA 92110

M-1 Please see Response B-1.

COMMENTS

RESPONSES

Comments on BASASP draft PEIR (April 2018). Project 586601.

5/9/2018

R Little

N-1	1) I am strongly in favor of the BASASP concept, though I consider the present project to be very constrained by limited vision and bureaucratic considerations, and as a result this draft PEIR has serious weaknesses.	N-1	The comment states the Draft Program Environmental Impact Report (PEIR) has "serious weaknesses;" however, no facts or other evidence is provided to support this assertion. No further response is required.
N-2	2) I am noting for the record my basic concerns with the present approach. 2a) The Balboa Avenue station is much too constricted and should have been placed on the north side of Balboa Avenue, taking over part of the Rose Creek Operations Center. At a minimum there could be a large parking area there with a pedestrian/bicycle bridge over Balboa Avenue. 2b) Rerouting the various on- and off-ramps to I5 should have been included in the concept. 2c) Allowing Clairemont to opt out of the plan is very bad. 2d) Restricting development in this area to 30 feet is very bad. 2e) Putting residential dwellings between I5 and Mission Bay Drive is a basic mistake. That area should be restricted to commercial development. 2f) Not separating pedestrians and bicycles from automobile traffic with a four-way bridge at the intersection of Garnet Avenue/Balboa Avenue and Mission Bay Drive is very short-sighted.	N-2	The Balboa Avenue Trolley Station is a component of the approved Mid-Coast Corridor Project currently under construction. Development and operation of the approved trolley station will occur at the approved location whether the Balboa Avenue Station Area Specific Plan (BASASP) is approved or not. The proposed project is a Specific Plan that proposes to re-designate and rezone lands to encourage and allow for public and private transit-orientated development in the vicinity of the approved trolley station. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities and proposed mobility improvements in the BASASP area.
N-3	3) The rest of my comments are more specific to some details of the draft PEIR. I did not examine all the sections. Much of it is a recitation of all the regulations that might be applicable without specifying which will be most important. Section 3: Project description. Two major goals are identified in the first paragraph but either the second one is incomplete or there is another goal omitted.	N-3	The two overarching goals of the BASASP are correct as stated in the Draft PEIR; however, there is a grammatical error at the end of the second goal. This has been corrected in the Final PEIR.

COMMENTS

RESPONSES

N-4	Figure 3-1 implies that all the auto dealers fronting Mission Bay Drive will disappear because they will be replaced by Community Village. There are no explicit statements in the document except that there will be “active commercial frontage” along the main roadways. I did not see any impact statements about the number of people and businesses that will be eliminated or moved.	N-4	It is correct that the land use plan of the BASASP proposes to re-designate the area currently occupied by automobile dealerships to Community Village. This re-designation would allow for future redevelopment of this area with transit-orientated development pursuant to the proposed land use designation and zone classification. The BASASP does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. Thus, it would be speculative to assess impacts to businesses that could potentially be displaced upon full implementation of the BASASP. Moreover, the California Environmental Quality Act (CEQA) does not require analysis of economic or social effects pursuant to Section 15131 of the State CEQA Guidelines.
N-5	Section 5: “Environmental analysis”. Table 5.1-11 on the policy for noise abatement appears to be inconsistent with residences on the east side of Mission Bay Drive.	N-5	Table 5.1-11 in the PEIR identifies policies contained in the General Plan Noise Element pertaining to noise and land use compatibility that apply to new development proposals. Future development implemented in accordance with the BASASP, including residential uses designated on the east side of Mission Bay Drive would be subject to compliance with these policies. Furthermore, Section 5.10, <i>Noise</i> , of the PEIR identifies a potentially significant impact related to land use -noise compatibility and identifies mitigation (NOI-1) in the form of an acoustical study for project-specific development proposals that would expose people to noise exceeding normally acceptable levels (as identified in the Noise Element) and incorporation of design considerations to attenuate noise to acceptable levels. Implementation of the identified mitigation would ensure that future development per the BASASP would be consistent with the listed Noise Element policies of Table 5.1-11.
N-6	Table 5.2-6 shows that the maximum emissions modeled are much above the screening thresholds for VOC, Co and PM (10 and 2.5) and there is no real mitigation likely for the residences in the area east of Mission Bay Drive.	N-6	It is correct that Table 5.2-6 in the PEIR shows that the net maximum daily operational emissions of criteria pollutants would exceed applicable thresholds for volatile organic compounds (VOC), carbon monoxide (CO), and particulate matter (PM ₁₀ and PM ₅). The PEIR (in Section 5.2.5.2) concludes that the increase of these criteria pollutant emissions would result in a significant air quality impact. Mitigation framework is identified the PEIR (AQ-2, AQ-3, and AQ-4) that would
N-7	Tables 5.6-4 and 5.6-7 say that adoption of BASASP will not increase GHG emissions. The last paragraph of 5.6.4.3 says that this will be consistent with the CAP. The logic escapes me as it is expected that the population of San Diego will increase some 35% by 2050 so the places vacated by the people who move into BSASP will be occupied by others.		
N-8	Section 5.9.1.1 says “selenium and toxicity” are the main contaminants in Rose Creek. I suggest someone check the actual data as it is at least 10-15 years old, and as far as I know there is no recent data.		

COMMENTS

RESPONSES

N-9	Figure 5.10-2 shows noise contours up to 75dBA CNEL where residences will go on the east side of Mission Bay Drive. This is clearly not compatible with reasonable noise limits. The proposed loophole that the City of San Diego is likely to invoke (up to 75dBA CNEL when primarily affected by vehicle noise) is not acceptable.	N-6 (cont.) include air quality modeling for specific development proposals implemented under the BASASP (including residential projects east of Mission Bay Drive) and incorporation of mitigation to reduce potential impacts. However, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes air quality impacts are significant and unavoidable.
N-10	Section 5.12 predicts a 36% increase in city population between 2012 and 2050.	N-7 Table 5.6-4 in the PEIR summarizes the estimated existing annual greenhouse gas (GHG) emissions in the BASASP area while Table 5.6-7 summarizes annual GHG emissions associated with buildout of the adopted Community Plans (Pacific Beach and Clairemont Mesa) and the proposed BASASP. Based on the air quality modeling, the total future GHG emissions are calculated to be less than existing primarily due to an estimated reduction in mobile source emissions. All other emission sources would increase. The reduction in mobile source emissions is attributable to more stringent automobile emission standards stipulated by regulations, as well as inherent reductions in automobile trips due to the BASASP being located within a Transit Priority Area and the close proximity of transit facilities.
N-11	Section 5.15 notes that bike conditions are very poor at present (LTS4). Note that most bikes and pedestrians will peak at the same time as auto traffic and that is not given much, if any, attention. Auto parking is poor at present and I did not see any attempt to improve it. As far as I can see the only proposed solutions for increase in all forms of traffic in this area is to paint white lines at the major intersections and to make some traffic lanes into bike lanes. This is a problem, not a solution. See table 8-10 in appendix K for the expected increase in Average Daily Trips (ADT) of auto traffic. I noticed that the proposal in appendix K to increase the number of traffic lanes did not receive much attention in the PEIR.	N-8 Section 5.9.1.1 has been revised in the Final PEIR to include information on Rose Creek and Mission Bay as impaired water bodies based on the Clean Water Act 2014/2016 303(d) List, which includes the most recent available water quality data.
N-12	Section 6: "Cumulative impacts" Note that figure 6-1 shows De Anza Revitalization Plan including the area west of Rose Creek. The City Planning Department insists that the DARP is only east of Rose Creek.	N-9 Section 5.10, <i>Noise</i> , of the PEIR concludes that future development implemented in accordance with the BASASP could potentially result in significant land use -noise compatibility impacts and includes mitigation measure NOI-1, which would require noise attenuation measures to protect residents from excessive noise.
N-13	Table 6-2 shows proposed cumulative impacts. In my opinion some of the "no" should be "yes". Transportation and Noise are good examples.	N-10 This comment includes data contained in Table 5.12-1 in the PEIR but does not raise any CEQA-related issues. No further response is required.

COMMENTS

RESPONSES

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- N-11 Section 5.15, *Transportation/Circulation*, of the PEIR includes discussions on bicycle and pedestrian facilities. One of the overarching goals of the BASASP is identifying multi-modal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station. Section 5.15 discusses how these planned facilities would improve alternative transportation connectivity and accessibility. The Statement of Overriding Considerations addresses why the City did not include additional travel lanes in the BASASP.
- N-12 The entire Mission Bay Park Master Plan Amendment—De Anza project area extends west of Rose Creek as accurately shown in Figure 6-1 of the PEIR.
- N-13 Table 6-2 in the PEIR summarizes the comprehensive cumulative impact analysis presented in Chapter 6.0 of the PEIR. The impact conclusions are based on the supporting analysis for each resource area contained in Section 6.3. The comment makes a general statement about disagreeing with some of the impact conclusions, including Transportation and Noise in particular. However, there is no supporting analysis or evidence to substantiate this assertion.

COMMENTS

RESPONSES

O-1

From: Eddie Bradford <eddie.bradford@gmail.com>
Sent: Tuesday, May 15, 2018 7:32 PM
To: PLN_PlanningCEQA
Subject: Needs more funding for traffic gridlock problems

This doesn't do enough to address the new traffic problems with 5K new housing units west of the IHS. Please invest the required resources to adequately address inevitable traffic gridlock problems that are already anticipated in this report.

Concerned Clairemont resident

Eddie Bradford

O-1 Please see Response B-1.

COMMENTS

RESPONSES

From: Genie <genielerch-davis@att.net>
Sent: Tuesday, May 15, 2018 10:42 PM
To: PLN_PlanningCEQA
Cc: Genie Lerch-Davis
Subject: Balboa Avenue Station Area Specific Plan Project No.: 586601 / SCH No. 2017071007

P-1

As a long-time resident of the Bay Park/Morena Blvd. area, I oppose construction of high-density housing projects before needed infrastructure upgrades are in place. The roads and water mains in this area are in desperate need of updating. The addition of thousands of new residents and vehicles will overstress our antiquated utilities and roadbeds. The intersection of Garnet/Balboa and the I-5 on/off ramps is already overtaxed with auto, bicycle, and pedestrian traffic. Planners are deluding themselves if they believe new residents in the planned housing developments will not be bringing automobiles with them. It is impossible to get children to sports, dance, music, and other after-school activities without an automobile.

If the city envisions adding thousands of residents to this area, it must FIRST widen and improve roads, provide safe sidewalks and bikeways along every roadway, and modernize all utility infrastructures. Only then will it be safe to increase the population.

Safe roads, safe sidewalks, safe bikeways, and up-to-date utilities: first things, first!

Thank you!

Genie Lerch-Davis
5104 Ellsworth Street
San Diego, CA 92110

P-1

Please see Response B-1 regarding traffic and Response N-11 for multi-modal improvements. With respect to infrastructure, the Program Environmental Impact Report for the Balboa Avenue Station Area Specific Plan analyzes potential impacts to infrastructure and public utilities (Section 5.14), which concludes that impacts related to water supply, utilities, solid waste management, and energy consumption would be less than significant.

COMMENTS

RESPONSES

From: richard.ernst@gmail.com on behalf of Rich Ernst <remst@remst.com>
Sent: Wednesday, May 16, 2018 4:36 AM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No. 2017071007

What's wrong with you people?

The busiest intersection in San Diego and you want to almost QUINTUPLE the number of people living there? It's bad enough you are crippling the roads via no maintenance and removing lanes of thousands of vehicles of traffic for bike lanes that only serve very few, please do NOT cram this on us.

Have you drive through there during rush hour lately? I think it should be required of all folks having anything to do with this plan to have to drive through there EVERY work day for a month, THEN tell us it's a good plan to increase density.

You cannot increase density at the same TIME as putting in poorly designed mass transit. You have to have GOOD mass transit first.

Putting a trolley where folks can't get to it easily except right around the stations is ridiculous and since politics are at the forefront of the trolley route, getting a GOOD trolley system here will NEVER happen. (UCSD garbage routing).

Put the density downtown, NOT where we live and work and want the neighborhood to stay the same as when we bought it.

So vote NO on this plan, stop forcing horrible, crime ridden higher density plans with poor traffic planning on us.

Thank you.

Richard Ernst

P.S. I'm surprised I took the time to even write this. Quite a number of years ago (resident 40 years), I gave up on a SD government of the people, by the people and for the people since it's obviously of business/contractors, by business/contractors and for business/contractors.

Q-1

Q-1 Please see Response B-1 regarding traffic and Response N-11 for multi-modal improvements.

The Balboa Avenue Station Area Specific Plan (BASASP) identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.

COMMENTS

RESPONSES

R-1

From: Boulton-Hunyady, Christine
Sent: Thursday, May 17, 2018 3:02 PM
To: PLN_PlanningCEQA
Cc: jnm768@aol.com
Subject: Balboa Avenue Station, Project #586601

To whom it may concern,

As a San Diego City resident who lives on Balboa Avenue, I respectfully request the significant air quality, noise and traffic congestion issues be satisfactorily mitigated prior to finalizing the Balboa Avenue Station project.

Sincerely,

Christine

Christine Boulton-Hunyady, CPA, CIA
Accountant III
City of San Diego
Public Utilities Department

T (858) 292-6381

C (619) 917-6878

C.Boulton@san-diego.gov

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R-1

The Program Environmental Impact Report (PEIR) identifies mitigation for significant impacts related to air quality, noise, and traffic and discloses where impacts cannot be mitigated to less than significant. In the case of air quality and noise, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes noise and air quality impacts are significant and unavoidable even though such impacts associated with future development proposals implemented under the Balboa Avenue Station Area Specific Plan may be less than significant or mitigated to below a level of significance with the identified mitigation.

COMMENTS

RESPONSES

From: Melanie Nelson <melanie.r.nelson@gmail.com>
Sent: Saturday, May 19, 2018 1:45 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan, project number 586601, SCH number 2017071007

Hello,

I am writing to express my support for the Balboa Avenue Station Area Specific Plan. There are several aspects I think will have a positive impact on the environment:

1. The improved bike lanes/paths

My husband bikes to work one day a week, and his route takes him through a section covered by this plan. The improved bike lanes will make his bike commute safer. This improved safety may encourage more people to commute by bike.

2. The increased housing density

This is a central area and a good place to put higher density housing! The new housing will have great access to Mission Bay and also good transit options.

3. The pedestrian access from Morena to Balboa

I used to live in the condos near this location. Although I was technically within walking distance to Mission Bay and enjoyed walking as a means of getting places, I could never walk to Mission Bay because there was no safe way to get down from Morena Blvd onto Balboa. I am glad to see this will be improved, and that the walking conditions along the stretch of Balboa between Morena and Mission Bay Dr. will be improved. I think this will encourage more area residents to walk to Mission Bay rather than driving there.

All in all, I think the new plan looks great, and I look forward to the improvements in the area.

Thank you,
Melanie Nelson
Clairmont home owner and voter

S-1

S-1 The City acknowledges this comment in support of the project.

COMMENTS

RESPONSES

T-1

From: Dalton <bdalton1@san.rr.com>
Sent: Saturday, May 19, 2018 5:23 PM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan, Project No. 58601 / SCH No. 2017071007

High density is not the solution.

And just to mention two problems: Where will the water come from? and what about traffic?

You are trying to solve a problem, but not even talking about the real cause of the problem; which is too many people.

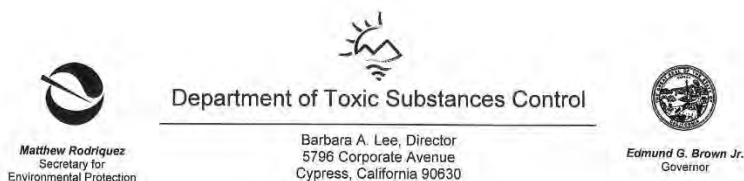
Thank you.

T-1

Please see Response B-1 regarding traffic. With respect to water supply, Section 5.14, Public Utilities, of the Program Environmental Impact Report (PEIR) analyzes water supply based on a Water Supply Assessment (WSA) that was prepared for the Balboa Avenue Station Area Specific Plan and included as Appendix J to the PEIR. The WSA concluded that the project is consistent with the water demand assumptions included in the regional water resource planning documents of the City Public Utilities Department, County Water Authority, and Metropolitan Water District.

COMMENTS

RESPONSES



May 21, 2018

Ms. Rebecca Malone
Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, California 92123
PlanningCEQA@sanidiego.gov

ENVIRONMENTAL IMPACT REPORT (EIR) FOR BALBOA AVENUE STATION AREA SPECIFIC PLAN PROJECT, BOUNDED BY ROSE CREEK, INTERSTATE FREEWAY I-5, CLAIREMONT MESA COMMUNITY PLANNING AREA, SAN DIEGO, SAN DIEGO COUNTY (SCH# 2017071007)

Dear Ms. Malone:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: "The proposed Balboa Avenue Station Area Specific Plan (BASASP) would increase residential density by redesignating and rezoning lands to allow for transit-oriented development adjacent to the Balboa Avenue trolley station." The EIR further states, "The project site encompasses approximately 210 acres (0.33 square miles) in the Pacific Beach and Clairemont Mesa communities of the City of San Diego."

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

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
2. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

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U-1 As discussed in Section 5.8, *Human Health/Public Safety/Hazardous Materials*, of the Program Environmental Impact Report (PEIR), there are three listed hazardous materials sites within the Balboa Avenue Station Area Specific Plan (BASASP) area that had reported releases of hazardous materials and one listed site that is regulated for hazardous materials storage. The three release sites include a former car dealership and two gas stations (one existing and one former) and are undergoing or have undergone site assessment/remediation under the oversight of applicable regulatory agencies. All future development and redevelopment activities under the proposed project would be required to conform to applicable regulatory/industry and code standards related to hazardous materials. This would involve compliance with relevant federal, state, and local standards related to hazardous materials, including discretionary approval from the County Department of Environmental Health (DEH) for all applicable projects proposed within the BASASP area. This would entail receipt of clearance from the County DEH, including appropriate remediation efforts for applicable locations. Documentation of such clearance would be provided as part of the project-specific California Environmental Quality Act (CEQA) and/or Building Permit reviews and would be a requirement for all project approvals.

U-2 Future development proposals implemented under the BASASP would obtain a National Pollutant Discharge Elimination System wastewater discharge permit from the Regional Water Quality Control Board on a project-specific basis, if required.

COMMENTS

RESPONSES

Ms. Rebecca Malone
May 21, 2018
Page 2

U-3

3. The EIR states, "Asbestos insulation and other hazardous building materials (e.g., lead-based paint) may be present in structures within the BASASP area built prior to the mid- to late 1970s when the use of such substances was largely discontinued." If planned activities include building modifications/demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be investigated and mitigated/disposed of in accordance with all applicable and relevant laws and regulations.

U-4

4. The EIR states, "These include: certain crops (e.g., rice, barley, oats, wheat – particularly durum – corn, sunflower, clover, berries, cherries, grapes, and apples); farming activities (e.g., tilling and harvesting); confined livestock operations (i.e., feedlots, dairy operations, hog or chicken production facilities, or egg-laying operations); and various farming practices (e.g., livestock feed, water, and manure)." If the site was used for agricultural or related activities, residual pesticides may be present in onsite soil. DTSC recommends investigation and mitigation, as necessary, to address potential impact to human health and environment from residual pesticides.

U-5

5. The EIR states, "A number of pad- and pole-mounted transformers are present within the BASASP area, with these facilities (depending on their age) potentially containing polychlorinated biphenyl (PCB) dielectric fluids." DTSC recommends evaluation, proper investigation and mitigation, if necessary, of onsite areas with current or historic PCB-containing transformers.

U-6

6. The EIR states, "Local freeways, including I-5, may contain soils with aerially-deposited lead derived from vehicular exhaust emissions prior to the elimination of leaded gasoline in the mid-1980s." As the project site is adjacent to I-5 Freeway, this issue should be addressed in accordance with all applicable and relevant laws and regulations.

U-7

7. The EIR further states, several are currently under remediation or remediated in the past under the supervision of different agencies. DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the EIR. DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs) or total petroleum hydrocarbons (TPH). DTSC recommends soil gas sampling to confirm no residual VOC/TPH contamination remain onsite and/or risk is acceptable based on applicable and relevant state guidelines.

U-8

8. If the project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable

U-3

The BASASP does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. All future development and redevelopment activities under the proposed project would be required to conform to applicable regulatory/industry and code standards related to hazardous materials, including asbestos and other hazardous building materials. This would involve compliance with relevant federal, state, and local standards related to hazardous materials, including discretionary approval from the County DEH for all applicable projects proposed within the BASASP area. This would entail receipt of clearance from the County DEH, including appropriate remediation efforts for applicable locations. Documentation of such clearance would be provided as part of the project-specific CEQA and/or Building Permit reviews and would be a requirement for all project approvals.

U-4

The quotation in the comment does not appear in the PEIR. The BASASP area is a developed urban area and based on a review of available historic aerial photographs, no former agricultural operations are known to have historically occurred within the BASASP area. Thus, no significant health hazards impacts associated with residual concentrations of pesticides in underlying on-site soils would occur.

U-5

Please see Response U-3.

U-6

Please see Response U-3.

U-7

Please see Response U-1.

U-8

Please see Response U-3.

COMMENTS

RESPONSES

Ms. Rebecca Malone
May 21, 2018
Page 3

U-8
(cont.)

and relevant laws and regulations. In addition, if imported soil was used as backfill onsite and/or backfill soil will be imported, DTSC recommends proper evaluation/sampling as necessary to ensure the backfill material is free of contamination.

U-9

9. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,



Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program – Cypress

kl/sh/ja

cc: See next page

U-9 Please see Response U-3.

COMMENTS

RESPONSES

Ms. Rebecca Malone
May 21, 2018
Page 4

cc: Ms. Alyssa Muto (via e-mail)
Deputy Director
Planning Department
City of San Diego
PlanningCEQA@sanidiego.gov

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

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

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

CEQA# 2017071007

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COMMENTS

RESPONSES

V-1

From: mtsos@sbcglobal.net
Sent: Tuesday, May 22, 2018 10:41 AM
To: PLN_PlanningCEQA
Subject: Balboa Ave Station Plan

We are not in agreement with rezoning the areas you want to rezone for higher density. Right now Clairemont is in complete gridlock from all the construction going on in our neighborhood. Trying to drive to Pacific Beach via Balboa will be a nightmare. Trying to get to I-5 will be a disaster. Yes, we need more housing but not at the expense of the current taxpayers. A more sensible plan should be addressed. As it is now, Mission Bay Drive is fully impacted with autos any hour of the day, not just rush hour.

Thanks for listening,

Maria Trapasso
Clairemont resident who opposes higher density

V-1 Please see Response B-1 regarding traffic and the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding residential densities in the BASASP area.

COMMENTS

RESPONSES

From: Corinne Cumming <candy.c2@icloud.com>
Sent: Wednesday, May 23, 2018 12:47 PM
To: PLN_PlanningCEQA
Subject: Project No: 586601/SCH No 2017071007

Hello Planners!

As a person who has lived in Pacific Beach and Clairemont for 45 years I **OPPOSE** the plan Project No: 586601/SCH No 2017071007

The current plan for 1221 units is feasible. However **the plan for 4729 units, six times as many as existing units is absurd.**

Heading west on Balboa into Pacific Beach is already a nightmare at certain times of day in and during summer. There are too many roads: Balboa Avenue, Morena Boulevard, East Mission Bay Blvd., a few side streets and entrances onto I-5 North and South.. Unless you have plans to greatly improve roads in this area, you will only add to congestion and aggravation...unless your goal is to make San Diego less liveable and unpleasant. Granted some people will use the trolley, but be realistic. Californians will still use cars as public transport is so lacking when compared to my hometown, NYC.

Thanks you for considering my opinion,
Candy Cumming
4064 Mt Bolanas Ct
San Diego, CA 92111

W-1 Please see Response B-1 regarding traffic and Response N-11 for multi-modal improvements.

W-1



Save Our Heritage Organisation
Saving San Diego's Past for the Future

Wednesday, May 23, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Balboa Avenue Station Area Specific Plan, Project No. 586601

Ms. Malone,

Save Our Heritage Organisation (SOHO) understands a Program Environmental Impact Report (PEIR) has been prepared for the Balboa Avenue Station Area Specific Plan (Project No. 586601), which has identified significant impacts to Historical and Tribal Cultural Resources.

Potential impacts to the Trade Winds Motel Sign at 4305 Mission Bay Drive and the Chase Bank Building at 4646 Mission Bay Drive warrant consideration with regard to potential future impacts as a result of this project. The Motel sign is significant under local Criteria A and C, and is an iconic visual at this corner. Additionally, this sign is part of the larger Tiki/Polynesian architectural style that was once prominent in the Pacific Beach, Point Loma, and Shelter Island areas. The Chase Bank building, though less than 45 years in age, is still potentially historic and should be treated as such due to the architectural style and artist Millard Sheets mural mosaics.

Since the entire project area west of I-5 is within the significant ethnohistoric village of La Rinconada de Jamo, SOHO asserts that the City should continue consulting with tribal entities and strongly encourages that if archaeological monitors are needed on site, that Native Monitors also be present. Further, since a records search has occurred and due to the prior substantial disturbance, the Institute for Canine Forensics should be considered to help determine if there are unrecorded Ancestor burials in and around the project area prior to the start of construction. Also, the results of this canine investigation and Monitoring should influence project design with regard to preservation in place or impact minimization, in consult with tribes, which could occur as part of the final design and project options.

Thank you for the opportunity to comment.

Bruce Coons
Executive Director
Save Our Heritage Organisation

2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax

X-1

X-2

- X-1 As discussed in Section 5.7, *Historical and Tribal Cultural Resources*, of the Program Environmental Impact Report (PEIR), the Trade Winds Motel sign and the Chase Bank building are identified as historical resources and mitigation (HIST-1) is identified for future impacts to these resources.
- X-2 The PEIR acknowledges in Section 5.7, *Historical and Tribal Cultural Resources*, that the BASASP area is located within the traditional territory of the Kumeyaay people and the BASASP area west of Interstate 5 is within the known Kumeyaay village site of La Rinconada de Jamo. Accordingly, the PEIR identifies a potentially significant impact associated with future development within or in proximity to this resource. Mitigation (HIST-2) is identified to minimize impacts to tribal cultural resources and includes coordination with Native American tribes and provisions for Native American monitors. Mitigation Measure HIST-2 recommends that a qualified archaeologist and Native American monitor be present during ground disturbing activities where called for by an initial determination and/or survey. HIST-2 did not recommend that a representative of the Institute for Canine Forensics be present, but also does not preclude the use of such a representative. Whether or not canine investigation is warranted would be determined on a site by site basis.

**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

23 May 2018

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

Subject: Draft Program Environmental Impact Report
Balboa Avenue Station Area Specific Plan
Project No. 586601

Dear Ms. Malone:

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

We agree with the analysis in the cultural resources appendix, prepared by Helix Environmental. As clearly stated, much of the project area is highly sensitive for the presence of cultural resources. As this is a programmatic EIR, the actual mitigation measures will be reflected on the project level. Therefore, please continue to include SDCAS in the public review notifications for the individual projects.

Thank you for the opportunity to review and comment upon this DPEIR.

Sincerely,

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

cc: Helix Environmental
SDCAS President
file

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

Y-1 Concurrence with the cultural resources analysis conducted for the Program Environmental Impact Report is noted. The City will continue to provide notifications to the San Diego County Archaeological Society for California Environmental Quality Act documents prepared for specific development projects.

COMMENTS

RESPONSES

From: stnsinr <stnsinr@yahoo.com>
Sent: Friday, May 25, 2018 8:41 PM
To: PLN_PlanningCEQA
Subject: Balboa/Morena Project

RE: PROJECT NAME: **Balboa Avenue Station Area Specific Plan**
PROJECT No.: **586601** / SCH No. **2017071007**

While a trolley station can be helpful for long term transportation alternative, the whole plan to increase the density of housing with the inevitable increased traffic is not a good or a healthy plan for the community. Some in San Diego may want cheap housing, but the quality of life will inevitably suffer. With all the emphasis on environmental sensitivity, condensing the population even further it not good strategy or healthy. Please reconsider overpopulating an urban area already saturated.

Rodger J. Gredvig
6548 Alcala Knolls Dr
San Diego, CA 92111

Z-1

Z-1

Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities in the BASASP area.

COMMENTS

RESPONSES

From: Stephanie Pfaff <stephaniepfaff@earthlink.net>
Sent: Friday, May 25, 2018 9:36 PM
To: PLN_PlanningCEQA
Subject: PROJECT NAME: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No.: 2017071007

Dear Ms. Malone-

Regarding the traffic impact:

9	Balboa Ave at Clairemont Dr	Signal	AM	47.6	D	51.0	D	
			PM	59.2	E	84.6	F	Yes

This is very concerning given the amount of student pedestrians using that intersection to walk to Marston Middle School and Clairemont High School. The addition of the Starbucks drive thru at the same corner has worsened the intersection ever since it opened. At peak times, the drive thru line snakes out of the parking lot onto Clairemont drive worsening the congestion. Frustrated drivers gun through yellow lights and distracted students often walk into traffic without looking. An increase in automobile traffic (and even pedestrians) is going to have a major impact.

I would urge the city to look more closely at this intersection for the sake of the many pedestrians that use it. There is currently a vacant lot on the NE corner of the intersection. If that ever gets developed, I'm sure things will only get worse.

Sincerely,

Stephanie Pfaff

P.S. Save the bank murals and the Trade Winds sign, otherwise the construction crew will just take them. It's sad that nothing was saved from the Guy Hill Cadillac dealership (tiled logo in showroom).

AA-1 Please see Response B-1 regarding traffic.

AA-2 As discussed in Section 5.7, *Historical and Tribal Cultural Resources*, of the Program Environmental Impact Report, the Trade Winds Motel sign and the Chase Bank building are identified as historical resources and mitigation (HIST-1) is identified for future impacts to these resources.

COMMENTS

RESPONSES

AB-1

From: Craig Rolain <cragstr@gmail.com>
Sent: Monday, May 28, 2018 9:28 AM
To: PLN_PlanningCEQA
Subject: Balboa Avenue Station Area Specific Plan; 586601 / SCH No. 2017071007

I would like to take this opportunity to express my distress regarding the above listed Area Specific Plan (ASP).

I think ASP is an appropriate abbreviation, as I believe this plan to be a snake in the grass. While portions of the plan regarding traffic improvements, public transportation, and making the area more bicycle friendly are admirable, I do not know how any of you can in good conscious really believe one can shoehorn over 4,700 dwelling units into a postage stamp of an area.

Traffic getting off SB I-5 into Pacific Beach is already a nightmare at most hours of daylight, soon SB traffic will be backed up as far as the Hwy 52 connector. Also, morning traffic getting onto NB I-5 will likely push traffic down Garnet to the Garnet/Balboa split and up Balboa beyond Moraga to the east. If this plan goes forward, I can see the southern approach on NB I-5 into Pacific Beach becoming a similar nightmare with exiting traffic easily getting backed up as far as Sea World Drive.

Your plan appears to hinge on a Utopian idea that all the new residents of these 4700 dwelling units, many of which will likely be multi-occupancy, will be live work and play inside the confines of the ASP. This is not reality.

Respectfully,

Craig Rolain
Bay Ho

AB-1 Please see Response B-1 regarding traffic.

COMMENTS

RESPONSES

AC-1

From: Wayne Allan <wayneandlani@gmail.com>
Sent: Monday, May 28, 2018 10:55 PM
To: PLN_PlanningCEQA
Subject: Comment: Balboa Avenue Station Area Specific Plan Draft PIER

The EIR states there is an awareness of the traffic problems caused by the high density development proposed for Balboa and I-5; and, if it were possible to resolve them, that it would not be consistent with the plan to discourage the use of the privately owned vehicle. For the vast percentage of people living in San Diego who must use their car, that would be a significant blow to their quality of life. Build only the density that can, and will, be supported by transportation infrastructure.

Wayne Konopaske

AC-1 Please see Response B-1 regarding traffic.

COMMENTS

RESPONSES



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

May 29, 2018

File Number 3300300

Ms. Rebecca Malone
City of San Diego
9485 Aero Drive, Mail Station 413
San Diego, CA 92123

Dear Ms. Malone:

SUBJECT: Balboa Avenue Station Area Specific Plan (Project No. 586601) Draft Program Environmental Impact Report

Thank you for the opportunity to comment on the City of San Diego's Balboa Avenue Station Area Specific Plan Draft Program Environmental Impact Report (PEIR). The San Diego Association of Governments (SANDAG) appreciates the City of San Diego's efforts to implement the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan) that emphasize the need for better land use and transportation coordination. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are based on policies included in the 2015 Regional Plan and are submitted from a regional perspective.

Smart Growth

This project is located in an Existing/Planned Town Center (SD PB-3), a Smart Growth Opportunity Area (SGOA) identified on the Smart Growth Concept Map. SANDAG appreciates that the City of San Diego has prioritized transit-oriented development and land use changes that support the Smart Growth Concept Map and 2015 Regional Plan. A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all.

Transportation Demand Management

Thank you for incorporating transportation demand management (TDM) strategies into the Balboa Avenue Station Area Specific Plan and PEIR. Please consider partnering with iCommute, the SANDAG TDM program, to increase the use of transit, vanpool, carpool, and biking. The iCommute employer services program works with businesses to develop and implement customized commuter programs that encourage employees to use transportation alternatives and support the transportation goals of the City of San Diego's Climate Action Plan. More information on regional TDM programs is available at iCommuteSD.com.

MEMBER AGENCIES

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Carlsbad
Chula Vista
Coronado
Del Mar
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Imperial Beach
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and
County of San Diego

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

AD-1

AD-2

AD-3

- AD-1 The City concurs that the proposed project supports the goals of the 2015 Regional Plan, as discussed in Section 5.1.4.1 in the Program Environmental Impact Report.
- AD-2 The City concurs that the proposed project supports the Smart Growth Concept Map (available at: <https://www.sandag.org/index.asp?classid=12&projectid=296&fuseaction=projects.detail>) and the goals of the 2015 Regional Plan, as discussed in Section 5.1.4.1 in the PEIR.
- AD-3 Thank you for providing information on regional Transportation Demand Management (TDM) programs.

AD-4

Mobility Hubs

SANDAG, in coordination with the City of San Diego and the Metropolitan Transit System, is developing a Mid-Coast Corridor Mobility Hub Implementation Strategy to prepare recommendations for improving mobility and extending the reach of transit in the Balboa Station area. Please consider developing policies that support mobility hub implementation and improved connections to the future Mid-Coast Trolley stations, including the following:

- Facilitate and promote the use of shared mobility services (e.g., on-demand rideshare, microtransit) within nearby communities. Consider pursuing partnerships and pilot projects with on-demand rideshare (e.g., Uber, Lyft, Waze Carpool) and microtransit providers that can enhance connections to major employment sites, recreational areas, and other community destinations.
- Expand upon existing parking management strategies to reduce the demand for parking by developing a comprehensive parking-management plan that considers parking-management strategies such as priced parking, parking cash-out, and designated parking for carpools, vanpools, and other shared mobility options. Smart parking technologies also can help manage changing parking demands and facilitate parking reservations.
- Enhance pedestrian and street infrastructure investments in support of the 2014 San Diego Traffic Signal Communication Master Plan by encouraging the use of smart signal and smart intersection technologies where possible.
- Site publicly accessible electric vehicle charging infrastructure at key community destinations to ensure a connected charging network – electric shared mobility services require fast charging points to support operations.
- Ensure that shared mobility services have designated space within the public right-of-way. This includes dedicated curb space near major destinations in the community to help facilitate safe and convenient rideshare passenger pick-up and drop-off.

Additional information on the Mid-Coast Mobility Hub Implementation Strategy is available at sdforward.com/mobility-planning/mcMobilityHub.

Other Considerations

SANDAG has a number of additional resources that can be used for additional information or clarification on topics discussed in this letter. The following can be found at sandag.org:

1. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
2. Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities
3. Trip Generation for Smart Growth
4. Parking Strategies for Smart Growth
5. Designing for Smart Growth, Creating Great Places in the San Diego Region

AD-4 Thank you for providing these policy recommendations to enhance mobility and connections to transit facilities. Many of the concepts within these policies are similar to those included in the Balboa Avenue Station Specific Plan (BASASP). The BASASP identifies several multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station.

AD-5 Thank you for providing the sources for additional smart growth and TDM information.

COMMENTS

RESPONSES

AD-6

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

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

SANDAG appreciates the opportunity to comment on the City of San Diego's Balboa Avenue Station Area Specific Plan PEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/kwa

AD-6 SANDAG will be included on the distribution list for future notices of the availability of environmental documents for the BASASP.

GEORGE HENDERSON

3151 Driscoll Drive
San Diego, CA 92117
858-752-2016
george.henderson@gmail

May 29, 2018

(hand delivered)
Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive
MS413
San Diego, CA 92123

(email)
PlanningCEQA@sandiego.gov

Transmittal of Comments

Balboa Avenue Station Area Specific Plan Draft PEIR
Project No: 586601 SCH No. 2017071007

Dear Ms. Malone:

My comments regarding the Balboa Avenue Station Specific Plan Draft PEIR are attached. Please do not hesitate to contact me for discussion or clarification.

Sincerely,

George Henderson

cc: Naveen Waney, Chair, Clairemont Community Planning Group
Nick Reed, Vice-Chair, Clairemont Community Planning Group
Harry Backer, Chair, CCPG Ad-hoc Sub-Committee for Balboa Station
Members, CCPG Ad-hoc Sub-Committee for Balboa Station
Laurie Zapf, San Diego City Councilperson, District 2
Marc Schaefer, District 2 council Representative to Clairemont

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COMMENTS

RESPONSES

Balboa Avenue Station Area Specific Plan Draft PEIR

Comments by: George Henderson
3151 Driscoll Drive
San Diego, CA 92117

May 29, 2017

INTRODUCTION

The City of San Diego has proposed a Specific Plan for the Balboa Station Area. Its purpose is to "Establish a transit-oriented development [TOD] village that capitalizes on the trolley station investment by the San Diego Association of Governments [SANDAG] and MTS [The Metropolitan Transit System]."

I support this concept, if it can be properly implemented. A new, vibrant, densely-populated but connected neighborhood could be an asset to the neighboring communities of Pacific Beach and Clairemont.

City Planners have targeted land parcels on Mission Bay Drive for intense housing development. Viewed on a flat map, it would appear that these properties are home to auto dealerships and immediately adjacent to Balboa Station. It's a nearly intuitive expectation that replacing those auto dealerships with a "community village" should create ridership for the new trolley station. Intuition, however, doesn't account for impediments like the interstate highway, active railways, and significant climb that will stand between the new residents and our new trolley station.

Municipal Code Section §143.07 was recently updated. It redefines developer density bonuses; their application to this Specific Plan Area are a near certainty. The PEIR should be updated to account for impact and mitigation of its full bonus-laden buildout.

I am disappointed with other aspects of this draft PEIR, notably: Outreach to my community (Clairemont) has been inadequate; Significant impacts, with known mitigators, have been improperly characterized as "unavoidable"; Bias in favor of a singular vision enables vague, easy answers while discouraging imaginative thinking; and that bias calls into question the commitment to true environmental stewardship and the citizens of San Diego.

Following sections detail specific issues in these categories: Process; Density/Affordability; Mobility (vehicular); Mobility (alternative transportation modes); Environmental; and Services.

Recommendations and closing remarks are included as Section 10.

- AE-1 The City acknowledges this comment in support of the concept of the Balboa Avenue Station Area Specific Plan (BASASP).
- AE-2 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.
- AE-3 The BASASP provides the policy framework and land use controls to guide future development within the BASASP area pursuant to the proposed land use designation and zone classification. Future development would be required to comply with the land use policies and controls contained within the BASASP. While there are mechanisms in the City's Municipal Code and California law that allow for density bonuses under certain circumstances, it is not known and cannot be known at this time whether future development proposals would seek development incentives and if so, to what extent throughout the BASASP area. Thus, it would be speculative to estimate or account for future possible density increases utilizing these mechanisms. The California Environmental Quality Act (CEQA) does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145. Moreover, as discussed in Section 1.1.2 of the Program Environmental Impact Report (PEIR), future project-specific development proposals implemented under the BASASP would require subsequent approval. If density bonuses are proposed at the project level, they would be evaluated for consistency with the PEIR and associated potential impacts.
- AE-4 The Clairemont Mesa Community Planning Group formed a subcommittee to provide input on the Specific Plan process. The Subcommittee held seven meetings throughout the process to provide input on all aspects of the Draft Specific Plan.

COMMENTS

RESPONSES

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AE-4 (cont.)

As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

The PEIR discloses where impacts cannot be mitigated to less than significant. Impacts related to air quality (air quality plan consistency, construction and operations air emissions, and cumulative air emissions), historical and tribal cultural resources, noise (vibration and construction noise), paleontological resources (ministerial development), and cumulative transportation/circulation impacts (impacts to roadway segments, intersections, and freeway facilities) would remain significant and unavoidable. For some of these resources (air quality, historical and tribal cultural resources, and noise), impacts are assessed as significant and unavoidable even though mitigation is identified because the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes impacts associated with air quality, historical and tribal cultural resources, and noise are significant and unavoidable even though such impacts associated with future development proposals implemented under the BASASP may be less than significant or mitigated to below a level of significance with the identified mitigation. Because future ministerial development projects within the BASASP area will have no mechanism to determine the need for paleontological monitoring, impacts to paleontological resources associated with ministerial development under the BASASP are determined to be significant and unavoidable.

COMMENTS

RESPONSES

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AE-4 (cont.)

With regard to traffic, although improvements are identified in the PEIR that would reduce impacts, the City is unable to rely on these measures because (1) surrounding existing development restricts the ability to obtain sufficient right-of-way to construct some of the identified improvements and (2) the City believes that their implementation would be contrary to achieving the smart growth goals of the General Plan and BASASP.

AE-5

This comment is an introductory statement and identifies the issues raised in subsequent comments. See responses AE-6 through AE-48, which address specific comments related to these issues.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

1	Community Outreach Process
1.1	<u>The Clairemont Community was inadequately involved prior to creation of this draft PEIR.</u>
1.1.1	Our experience with the Morena Corridor Specific Plan and Clairemont Community Plan Update created an expectation of intense community involvement in the development of the Balboa Avenue Station Area Specific Plan (BASASP)
1.1.2	For instance, <i>The Morena Corridor Specific Plan</i> established a clear expectation that the community would have many opportunities for input before any documents circulated for approval. Many public Sub-Committee meetings were held before a Draft Specific Plan was published. There were additional opportunities for comment and revision before defining the scope for a not-yet-published Draft Environmental Impact Report. (Ref: Attachment 11.3)
1.1.3	For instance, <i>The Clairemont Community Plan Update</i> is underway with monthly Sub-Committee meetings and clearly defined process expectations. Drafts are being developed for the various plan elements with an abundance of community input. Those elements will be assembled into a Draft Community Plan which will then define the scope for a Draft Environmental Impact Report. (Ref: Attachment 11.4)
1.1.4	In contrast, the scope of this <i>Balboa Avenue Station Area Specific Plan PEIR</i> was developed nearly unilaterally by the Planning Department. It was a surprise announcement on 07/05/2017, with details revealed at a meeting in Pacific Beach on 07/18/2017. Next day, Clairemont's Balboa Station Specific Plan Sub-Committee held its fourth meeting. PEIR Scope was not on the agenda for 7/19/2017, however some drawings were hurriedly projected. Some community comments were offered at the meeting, however there is no evidence that Clairemont voices made any difference in the predetermined scope. (Ref: Attachment 11.5 Agenda for Clairemont Sub-Committee Meeting, 7/19/2017) I sent an email to the Planning Department on 07/05/2017 to express my concerns that the PEIR scope was being defined without without properly involving Clairemont. (Ref: Attachment 11.6 G Henderson email to M Prinz, 7/5/2017)
1.1.5	A consultant delivered this Specific Plan's traffic study in December, 2017. Level-of-service findings have been known for six months. Despite opportunities in January, February, and May of this year, study results have been inexplicably hidden from the community. Decisions to "Not Mitigate" traffic impacts were made unilaterally without public consultation.

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AE-6 Please see Response AE-4 regarding community outreach.

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

- | | |
|-----|--|
| 1.2 | <p><u>Formal Meetings have been too infrequent:</u></p> <ul style="list-style-type: none"> • 2016-05-16 First Meeting. Sub-committee formation & basics • 2016-11-02 Concepts • 2017-01-31 SANDAG Mobility Hubs (joint meeting with PB) • 2017-07-19 EIR Scoping Document revealed with some discussion • 2018-01-18 Draft Specific Plan revealed with some discussion • 2018-02-27 Draft Specific Plan public comments • 2018-05-09 Draft EIR 30-minutes of discussion; <p>(Planning Dept. would only accept/answer questions in writing.)</p> |
| 1.3 | <p><u>The PEIR refers to non-existent "pop-up outreach events."</u> To my knowledge they have not happened in Clairemont.
(Ref: PEIR Paragraph 4.2)</p> |
| 1.4 | <p>Thus far, community outreach seems to consist of the Planning Department revealing its own work, then defending against public comment.
<u>This Specific Plan should not have become adversarial;</u> there was a missed opportunity to be partners with Clairemont citizens.</p> |
| 1.5 | <p><u>This comment process is designed in a way that intimidates and prevents public understanding.</u>
The draft Environmental Impact Report is a complex document that required thousands of professional hours to create 537 pages plus eleven appendices. Specialized language requires six pages just to define acronyms and abbreviations.
It is unfair to expect that members of the public will somehow be able to understand the document, review in a timely manner, and feel confident that their interests are protected.</p> |
| 1.4 | <p>I find <u>no evidence that community-originated ideas from Clairemont have been widely incorporated</u> into the so-called "Preferred" or "Medium Density" options for this Specific Plan.</p> |
| 1.5 | <p><u>The Balboa Station Area Specific Plan is not referenced in the Clairemont pages of the Planning Department's website.</u>
Whether this is purposeful or an oversight, failure to make information available in an obvious location is an impediment to community understanding. I sent an email to the Planning Department on 01/22/2018 however nothing has changed.
(Ref: Attachment 11.7)</p> |

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AE-7 The public review process of the Draft PEIR was conducted in accordance with the requirements of CEQA, pursuant to CEQA Guidelines Sections 15087 and 15105. The City also extended the required 45-day public review period an additional 14 days in response to a request made by the Clairemont Mesa Community Planning Group to allow for additional time to review the Draft PEIR and provide comments. While some of the issues evaluated in the Draft PEIR are technical in nature, the document was not written using specialized language; rather, it purposely was written using non-technical language as much as possible in accordance with CEQA Guidelines Section 15140. The list of acronyms and abbreviations is included in the PEIR to define commonly and repeatedly used words and phrases in the PEIR to avoid redundancy and to reduce the overall length of the document.

AE-8 Comment noted. Comment does not address the adequacy of analysis presented in the Draft PEIR. Information on the BASASP is available on the City's website
(<https://www.sandiego.gov/planning/community/specificplans/balboa-station>) and links are provided on the Clairemont Mesa and Pacific Beach Community Profile webpages.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

2	This Specific Plan has failed to meet its original project objective.
2.1	The first stated "Project Objective", and the compelling reason to create a Balboa Station Area Specific Plan is: "Establish a transit-oriented development (TOD) village that capitalizes on the trolley station investment by the San Diego Association of Governments and MTS." (Ref: PEIR ES.2)
2.2	Deeply hidden within this PEIR is an extremely important revelation: "Impacts to alternative transportation mode trips under the BASASP would be less than significant." (BASASP = Balboa Station Area Specific Plan) (Ref: PEIR 5.15.4.4)
2.3	This specific plan does nothing visionary. It will not catalyze new or existing residents into using alternative transit. SANDAG (on January 31, 2017) presented "Mobility Hub" predictions for the year 2030. A disappointing daily total of only 365 riders will walk or bicycle either to or from the Balboa Trolley Station. (Ref: Attachment 11.1)
2.4	An <u>insignificant</u> number of new residents from the mixed-use development will walk or bicycle to work. An <u>insignificant</u> number of new residents from the mixed-use development will walk or bicycle to the trolley station. A <u>VERY significant</u> number of new residents from the mixed-use development will drive personal vehicles, further exacerbating neighborhood congestion. The "transit-oriented" village is not being realized. What remains is a dense, disconnected, polluting, new housing development.

AE-9 In the context of CEQA, the term "significant" means something very specific, as defined in CEQA Guidelines Section 15382:

"Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

Impact conclusions used in CEQA documents, such as "less than significant," "potentially significant," "significant," or "significant and unavoidable" are based on this definition and whether an established significance threshold is exceeded. Therefore, the conclusion of less than significant impacts related to alternative transportation modes means that implementation of the BASASP would not result in an adverse change with regard to use and function of alternative transportation modes (i.e., bicycles, transit, and walking) within the BASASP area, as evaluated in Section 5.15.4 of the PEIR. The BASASP would provide for additional and improved multi-modal facilities and connections to such facilities within the BASASP area.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

3	The PEIR-defined Specific Plan fails to achieve goals promised under a Sustainable Communities Planning Grant
3.1	On June 3, 2014 the Sustainable Growth Council (SGC) awarded \$786,832 of taxpayer funds to the City of San Diego for the creation of a "Balboa Station Area Plan".
3.2	This is the project description as approved by the Sustainable Growth Council: (Ref: Attachment 11.2 ... <u>underlining for emphasis</u> has been added to the excerpt below): <i>"The Balboa Avenue Station Area Plan would engage the community to establish <u>transit-oriented</u> development (TOD) adjacent to the planned Balboa Avenue Trolley station. <u>Multi-modal improvements will be identified to increase bicycle, pedestrian, and transit access to the station.</u> The area has constrained roadways that could affect access to the future Trolley Station. The existing land use and community plans do not effectively address TOD or multi-modal access to the Station. With the design process for the Mid-Coast Corridor Light Rail Transit Project underway, the service could serve as a catalyst for new TOD uses near the station. The Plan will engage the Pacific Beach and Clairemont communities to produce a Specific Plan and implementation program that <u>addresses transportation demand</u>, economic market analysis, urban design concepts, and <u>multimodal improvement projects</u>. The Plan will be implemented through Community Plan and Facilities Financing Plan amendments."</i>
3.3	<u>The City has failed to fulfill its promise to the SGC.</u> This EIR reports that impacts to alternative transportation mode trips are "insignificant" (Ref: Paragraph 2 above) I am sure that the SGC's Affordable Housing and Sustainable Communities Program would be disappointed if we fail to pick the low-hanging fruit of potential transit riders who live next door to a new trolley station.
3.4	It is clear that planning for this so-called "TOD Village" has not focused upon connectivity. As stated previously, what remains is dense, disconnected, polluting, new housing development.

AE-10 Please see Response AE-9.

AE-10

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

AE-11

4	Mobility (non-personal vehicle)
4.1	"Transit Oriented Development" is a misnomer when the residents cannot walk or bicycle to the transit? The PEIR fails to acknowledge impediments that separate proposed housing from the Balboa Trolley Station. The interstate highway, active railways, and a seventy-foot climb will stand in the way of potential pedestrians and bicyclists.
4.2	The PEIR plan descriptions include vague reference to a <u>pedestrian/bicycle shortcut from the "Village" to the Station</u> . Planning and design effort seems to end with a dotted-line circle on a map. Some have envisioned a tunnel, others a bridge, others a gondola. That discussion belongs in this Specific Plan. But there is no commitment, no funding source, and no enthusiasm from the Planning Department for any of these concepts. The lack of enthusiasm for planning connectivity contrasts unfavorably to the elaborate effort invested in rezoning maps.
4.3	The Metropolitan Transit System has been notably absent from all public discussions of the Specific Plan in Clairemont. Their disinterest is of critical concern.
4.3.1	<ul style="list-style-type: none"> • What are MTS' intentions for operating the trolley? • What are MTS' intentions for bus connectivity? • What are MTS' intentions for neighborhood shuttles?
4.3.2	This Specific Plan process was begun with a vision that the new Balboa trolley station should connect to residents. Either our public transit operator has been purposely excluded from the plan process, or MTS has purposely excluded the public from its own decision making.
4.3.3	Was the traffic study completed with input from MTS?

AE-12

AE-11 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.

AE-12 Please see Response AE-11 for connectivity to the Balboa Avenue Trolley Station.

MTS provided input on certain design assumptions with the proposed network within the BASASP area. The Traffic Impact Study prepared for the project was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual, including travel mode splits and allowable trip reductions for projects near transit stations.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

5	Mobility (vehicular)
5.1	The Morena Station Area Specific Plan will result in substantial environmental failures; most are directly caused by newly-created traffic gridlock. The PEIR's traffic study revealed level-of-service failures at two dozen locations. Yet this Plan fails to take accountability for solving seventeen of the problems that it causes. The City seems to offer a number of seemingly insincere philosophical excuses rather than preventing those failures. (Ref: PEIR Table ES-1; Section 5.15)
5.2	Eleven roadways and intersections will fail the level-of-service test if the Specific Plan is approved. Three are located within Clairemont, mitigators have been identified however no implementation is recommended: - Impact# 5.15-2 Balboa Avenue east of Clairemont Drive - Impact# 5.15-4 Clairemont Drive from Denver St. to Morena Blvd. - Impact# 5.15-8 Intersection of Balboa Avenue and Clairemont Drive. Four freeway segments and two freeway on-ramps will fail the level-of-service test if the Specific Plan is approved. Mitigation has been identified, however none is included in the plan: - Impact# 5.15-10 Four segments of I-5, from SR-52 to Clairemont Dr. - Impact# 5.15-11 Ramp to I-5 northbound @ Mission Bay Dr. - Impact# 5.15-12 Ramp to I-5 southbound @ Mission Bay Dr.
5.3	Rather than mitigate its real and measurable damage, this PEIR mis-characterizes those impacts as "significant and unavoidable". The word "unavoidable is mis-applied. I would call it "unwilling to try" and "unwilling to finance". I am both offended by and incredulous at the four excuses which are offered:
5.3.1	<u>Excuse (a): "Implementation of the improvements are contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community."</u> In other words, " <u>You should not be driving anyway so it's O.K. to inconvenience you.</u> " Does the "Big Brother" tone of this statement imply that the City now fosters an attitude that driving a car should become shameful and painful? Has that philosophy been officially adopted by vote of the City Council? How odd that I found it buried within the inscrutable minutia of an environmental impact report. "Excuse (a)" was obviously presented insincerely, with hope that no one would ever read or question it. The presumptive argument is incompatible with any and all investments in streets and vehicular traffic. Such a philosophy would wreak havoc throughout the City. "Excuse (a)" is applied unevenly even within this PEIR document. We know that five of twenty-four level-of-service failures were accepted for mitigation.

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AE-13

AE-14

AE-13 The PEIR discloses where impacts cannot be mitigated to less than significant. In those cases, impacts are considered significant and unavoidable because mitigation measures do not exist or are considered not feasible to reduce impacts to less than significant. Although improvements are identified in the FEIR that would reduce traffic impacts, one of the reasons the City determined these would be infeasible is because these improvements would require the acquisition of additional right of way, which would impact existing development. Also, in many cases, the City believes that implementation would be contrary to achieving the smart growth goals of the General Plan and BASASP.

AE-14 The proposed BASASP would create a mixed-use village which would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit. The proposed BASASP would establish a village in a suitable location as indicated on the Village Propensity Map contained in the General Plan (General Plan Figure LU-1). Mixed-use, transit-oriented villages are one form of "smart growth." One of the primary principles of smart growth is to encourage the use of alternative forms of transportation to reduce reliance on the private automobile. Although improvements are identified that would reduce vehicular traffic congestion, these measures can generally be considered inconsistent with the overall goals of the City's General Plan and BASASP. Additionally, roadway and intersection widening could impact existing or proposed pedestrian (such as at Clairemont Drive and Balboa Avenue intersection) or bicycle facilities, which could discourage walking and bicycling. As such, measures evaluated for Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive segments are considered infeasible due to, in part, policy considerations.

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

AE-15

5.3.2 Excuse (b): "Sufficient right-of-way does not exist to construct the improvements."
This statement defies logic and morality. The City has unilaterally chosen to break something that is working today. Our entire legal system is based upon a sense of fairness that requires that holds perpetrator of damage responsible for restoration, replacement, or mitigation of that damage.
In this case, mitigators were identified. Rights-of-way must be acquired. But the City has unapologetically announced its intention to harm its citizens and the regional economy.

AE-16

5.3.3 Excuse (c): "Impacts to CalTrans facilities would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur prior to the assumed buildout of 2035."
Once again, potential mitigators have been identified. San Diego should take the lead to assure that CalTrans has all of the resources necessary to construct those mitigators in a timely manner. But "Excuse (c)" seeks to absolve the City of all responsibility. Clearly, CalTrans manages freeway design and construction. Is San Diego's working relationship with CalTrans so dysfunctional that time commitments cannot be made? Do our decision makers accept that bureaucratic dysfunction is an acceptable rationale for "significant and unavoidable" failures?

AE-17

5.4.4 Excuse (d) "Implementation of freeway improvements in a timely manner is beyond the full control of the City since CalTrans has approval authority over freeway improvements. Additionally, the "Preferred Plan" includes a variety of transit, pedestrian and bicycle facilities that 'may' help to reduce single-occupancy vehicle (SOV) travel which can help improve ramp capacity."
The mobility gridlock caused by this Specific Plan, if un-mitigated, will impact tens of thousands of San Diegans at significant cost to the regional economy. Taxpayers expect our governmental agencies to work together seamlessly for our benefit. It is completely unacceptable for either San Diego or CalTrans to wash their hands of the gridlock that will surely happen if this Specific Plan is implemented without mitigation.
The second sentence of "Excuse (d)" is pure speculation and unworthy of serious comment.

AE-18

5.5 Was the traffic study completed with input from MTS?
If yes, then why has the Clairemont Sub-Committee for this Specific Plan been denied access to a MTS representative?
If no, then the validity of this traffic study must be questioned. Buses and shuttles maneuver suddenly, stop frequently and occupy a lot of surface street volume.

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AE-14 (cont.)

The other primary reason many of the improvements were determined not to be feasible is associated with right-of-way constraints and the effect they would have on existing development.

AE-15

As discussed in Response AE-14, one of the reasons that several identified traffic improvements were determined not to be feasible is that existing development restricts the ability to obtain sufficient right-of-way to construct improvements. Implementation of several of the improvements would require substantial right-of-way acquisition and removal of existing structures, which could result in additional air quality, greenhouse gas emissions, noise, and solid waste environmental effects, as well as increased pedestrian diversion at the intersection of Balboa Avenue and Clairemont Drive.

AE-16

The City does not have the authority to approve or implement improvements within the state freeway system, which is under the jurisdiction of Caltrans. Consequently, the City cannot control if, and when, identified improvements to freeway facilities would occur. For this reason, impacts to freeway facilities are considered significant and unavoidable. This does not mean that freeway improvements will never occur; however, there is no assurance that they will occur before the assumed buildout of 2035.

AE-17

Please see Response AE-16.

AE-18

MTS provided input on certain design assumptions with the proposed network within the BASASP area. The Traffic Impact Study prepared for the project was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual, including travel mode splits and allowable trip reductions for projects near transit stations.

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

AE-19

5.6 This Specific Plan causes a worsened gridlock and pedestrian hazard at the intersection of Balboa Avenue and Clairemont Drive. Then it unexpectedly attempts to assign mitigation responsibility to the Community Plan Update Sub-Committee. I oppose this interesting attempt to transfer accountability:

- The Clairemont Community Plan Update will not likely be approved until the end of 2019. Design, funding, and construction of any recommended mobility improvements will be on an unsure timeline.
- Permit applications for dense new housing will begin to appear shortly after this Specific Plan is approved. The Specific Plan has responsibility for its own mitigation, and must assure that it is in place before increased density is permitted.
- The Clairemont Community Planning Group and its Plan Update Sub-Committee should be consulted when designing the Specific Plan mitigators. (Ref: PEIR 5.15.6.3)

AE-20

5.7 Density Bonuses will surely be sought by any developer in the Balboa Station Specific Plan area. Those could increase the number of housing units by 5% to 50%. It does not appear that the increased mobility demands have been factored into the traffic study. New assumptions should be applied to the calculations, thereby giving us a better understanding of the degree to which mitigation is necessary.

AE-21

5.8 City Council could vote to implement the proposed re-zoning while simultaneously deciding to not mitigate significant impacts. The community will advocate for the construction of traffic mitigation. Perhaps the Planning Department might agree. Perhaps the Planning Commission might agree. But at the final approval step of this process, City Council could vote to simply increase zoning density without any mitigation. In my opinion, assurances must be in place before a mitigated Specific Plan is recommended for approval. (Ref: PEIR ES.4)

AE-22

5.9 Impact of Adjacent Density Increases
The traffic study ignores the traffic impacts of dense development proposed at the "Jeromes/Toys-R-Us" site on Morena Boulevard. This data should be considered if the Linda Vista Community Plan's vision becomes clarified in the near future.

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AE-19 While the PEIR mentions that the intersection of Balboa Avenue and Clairemont Drive will be furthered studied as part of the Clairemont Community Plan Update, mitigation for this intersection is not being deferred. The identified intersection improvements were determined not to be feasible for the reasons discussed in Response AE-14. Consequently, this impact is assessed as significant and unavoidable. The City prepared a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093, which must be prepared when significant and unavoidable impacts remain after changes or alterations are applied to a project. The Statement of Overriding Considerations provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental impacts.

AE-20 See Response AE-3.

AE-21 Pursuant to CEQA Guidelines Section 15093, CEQA requires the decision-making body of a lead agency to balance the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve a project. If the decisionmakers determine that the benefits of a proposed project outweigh the unavoidable environmental effects, the project can be approved with preparation of a Statement of Overriding Considerations.

AE-22 The traffic model information for future years included the proposed land uses for the BASASP and the adjacent Morena Corridor Specific Plan, and adopted future land uses current at the time. Potential impacts of certain developments or community plan updates should be considered in their respective processes.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

6	PEIR Process Concerns
6.1	The Environmental Impact Review process requires that at least three plan alternatives be offered to City Council for approval. (Ref: PEIR ES.6)
6.1.1	First alternative is the "Preferred Plan" Second is "No Project". Third, "Medium Density" alternative would be better named "Slightly Less". It is nearly indistinguishable, offering a relatively small one-sixth reduction in dwelling density compared to the "Preferred Plan".
6.1.2	There are 756 existing dwelling units in the Specific Plan area today. 4729 d/u are proposed, a 626% increase. The Medium Density alternative has 4167 d/u, a 551% increase. As might be expected this EIR calculates that both of these options would have enormous impact upon the communities.
6.1.3	Some other alternatives were briefly considered but quickly dismissed. It does not seem like much effort or imagination was expended in the search for less impactful ideas.
6.2	Municipal Code Section §143.07 was recently updated. It redefines developer density bonuses; their application to this Specific Plan Area are a near certainty. <u>The PEIR should be updated to account for impact and mitigation of its full bonus-laden buildout.</u>
6.2	The Balboa Station Area Specific Plan is not referenced in the Clairemont pages of the Planning Department's website. This is an impediment to community understanding.
6.3	The relationship of the Balboa Station Specific Plan to the Clairemont Community Plan Update is not obvious. At the Sub-Committee meeting on 05-09-18 Michael Prinz of the Planning Department offered that, "The Specific Plan informs the Plan Update. This is my understanding." That understanding may become important if the vision of the Clairemont Plan Update conflicts in any way with the Specific Plan.

- AE-23 CEQA does not require that a certain number of alternatives be considered in an EIR. In addition to the No Project Alternative: Adopted Community Plan and Medium Density Alternative that were evaluated in the PEIR, Section 10.4 in the PEIR identifies two other alternatives that were initially considered to reduce environmental impacts, including a Mobility Improvements Alternative and a Low Density Alternative. Descriptions of these alternatives and the reasons why they were not carried forward for further consideration is contained in Section 10.4.
- AE-24 Please see Response AE-3.
- AE-25 Please see Response AE-8.
- AE-26 The relationship of the BASASP to the Clairemont Mesa Community Plan is discussed in Section 1.4 of the Specific Plan. As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

7	Permanent Removal of a Morena Boulevard Traffic Lane
7.1	Clairemont's 60-year-old streets were not designed with wide shoulders and parkways. This fact will likely forever place an upper limit on what can be done to provide safe bicycle access. Some of our roads now have bicycle lanes that were made possible with imaginative striping and delineation. Those modifications are not permanent modifications to existing roadways; temporary "trials" can be inexpensively reversed if necessary.
7.2	We heard objections when the EIR Scoping proposal for the Balboa Station Area Specific Plan included the creation of a Class IV two-way bicycle track on Morena Boulevard. The plan would demolish one of the two southbound traffic lanes between Balboa Avenue and Gesner Street to make room for a section of Class IV bicycle track that will have no clear connection points at its north and south ends.
7.3	I support safe lanes for casual bicyclists. I am not yet convinced that a bicycle track intended for higher-speed cyclists can safely co-exist with pedestrians and casual bicyclists. The limited right-of-way on Morena Boulevard must be utilized in a manner that benefits the maximum number of Clairemont's citizens.
7.4	We have been experiencing a real-world trial of lane closures on Morena Boulevard for the last year. SANDAG's construction detours have caused an unacceptable drop in level of service that must not become permanent.
7.5	One southbound Morena Boulevard lane has been closed for nearly a year due to SANDAG's trolley construction. We don't need to imagine the impact, we see it every day. The community has recommend an obvious action: collect traffic data now. Why has this logical request been ignored? Why is current Morena Boulevard data not included in the traffic study?
7.6	Installation of huge underground pipelines for the "Pure Water" project will cause more years of hazardous, detoured traffic on Morena Boulevard. It would be shameful planning to demolish a traffic lane prior-to or during the pipeline installation.
7.7	Lane removal is a significant permanent decision. It cannot be easily undone. There should be careful study, with critical analysis of facts and assumptions.
7.8	Permanent demolition of a southbound Morena Boulevard would have broad community impact, far beyond the limited focus area of the Morena Station Area Specific Plan.
7.9	<u>The Morena Specific Plan should simply identify bicycling on Morena Boulevard as an "Opportunity." Analysis, decision making, and implementation is more properly assigned to the Mobility Element of the Clairemont Community Plan Update.</u>

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AE-27 The proposed reconfiguration of the right-of-way would allow for a two-way cycle track (Class IV bicycle facility) along the west side of Morena Boulevard to enhance bicycle access to the Balboa Avenue Trolley Station and connect to the City's bicycle network. As identified in the Traffic Impact Study prepared for the project (which is included as Appendix K to the PEIR) and Section 5.15.6 of the PEIR, Morena Boulevard is not anticipated to result in significant impacts to vehicle travel capacity with the reduction of one southbound travel lane.

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

AE-28

8	Air Pollution
8.1	<u>Air quality will be seriously harmed if this plan is implemented</u> "Mitigation Measures AQ-2 through AQ-4 would reduce criteria air pollutant emissions, but the contribution of air pollutants to the SDAB [San Diego Air Basin] would result in a significant and unavoidable cumulative impact to air quality within the SDAB" (Ref: PEIR 5.2.6.4)
8.2	<u>Why was "The "Environmentally Superior Alternative" rejected"</u>
8.2.1	According to PEIR Paragraph 10.3: "...the No Project Alternative is the environmentally superior alternative." "The No Project Alternative does not meet the purpose and objectives of the BASASP however, including identifying land use and mobility strategies to cohesively guide growth and development and foster walkable and transit-oriented communities." (Ref: PEIR 10.3)
8.2.2	But the "Medium Density" and "Preferred" Alternatives both fail to meet the "walkable and transit oriented communities" goal. Using this PEIR's logic, they should also be rejected.
8.2.3	An unspoken value hierarchy is being applied to the BASASP objectives. It is now obvious that the prime objective is: "growth and development."
8.3	This PEIR recommends the "Medium Density Alternative" which will add significant new pollutants to the San Diego Air Basin. Only two alternatives remained after the "No Project" option was rejected. Both the "Preferred" and "Medium Density" alternatives cause significant environmental damage, but they both meet the prime objective of growth and development. One is slightly less harmful to San Diego citizens: "Of the remaining alternatives, the environmentally superior alternative is the Medium Density Alternative." (Ref: PEIR 10.3)

AE-29

AE-30

AE-28 Section 5.2.6.1 of the PEIR concludes that the proposed project would result in significant and unavoidable cumulative air quality impacts because it cannot be demonstrated at the programmatic level that future development would not exceed applicable air quality standards. Mitigation is identified in the PEIR (AQ-2 through AQ-4) that would reduce impacts to a less-than-significant level, but the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Future project-specific development proposals implemented under the BASASP would require subsequent approval and would be evaluated for consistency with the PEIR and associated potential impacts, as discussed in Section 1.1.2 of the PEIR. The referenced text in Section 5.2.6.4 of the PEIR has been revised to clarify the basis for this conclusion.

AE-29 While the No Project Alternative was identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) requires another environmentally superior alternative to be identified that if the No Project Alternative is identified as the environmentally superior alternative.

Both the proposed BASASP and the Medium Density Alternative meet the project objectives identified in Section 3.4 in the PEIR pertaining to pedestrian mobility and transit-oriented development. The proposed BASASP would create a mixed-use village that would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit. Additionally, the project identifies pedestrian improvements, which include non-contiguous sidewalks and shared use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by shortening crossing distances. None of the identified project objectives entail "growth and development."

COMMENTS

RESPONSES

AE-31

AE-32

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

- 8.4 Obfuscating the New Pollution Caused by the BASASP
- Because there will be significantly more residents, there will be a huge increase of total pollutants.
 - Those emissions would place San Diego in violation of certain statutes.
 - The proposed mitigator is to simply request the Air Resources Board to raise our pollutant inventory.
- This slick administrative maneuver will not change the fact that there will be tons of new pollutants in San Diego's atmosphere if this Specific Plan is approved.
"If You Can't Win The Game, Change The Rules."
(Refs: Table ES-1; PEIR 5.2.4.3; Section 5.2 Mitigation Measure AQ-1)
- 8.5 I am disappointed that this Specific Plan does not seem to foster true environmental stewardship. If air quality is important, some out-of-the-box thinking needs to be applied to this Specific Plan.
An imaginative, less-polluting alternative needs to be envisioned so that we can capitalize on the trolley station investment by the San Diego Association of Governments and MTS.

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AE-30 Section 10.2.2.1 of the PEIR discusses potential air quality impacts of the Medium Density Alternative and notes that construction and operational emissions would be reduced compared to the proposed BASASP, but the PEIR concludes that air quality impacts under the Medium Density Alternative would be significant and unavoidable for the same reason as the proposed BASASP, which is that it cannot be demonstrated at the programmatic level that future development would not exceed applicable air quality standards.

The PEIR identifies the Medium Density Alternative as the environmentally superior alternative because it would reduce cumulatively significant and unavoidable impacts to transportation circulation (intersections). It would also result in similar or reduced impacts for issues areas determined to be significant under the proposed BASASP, including air quality, biological resources, historical and tribal cultural resources, noise, and paleontological resources.

AE-31 The Regional Air Quality Strategy (RAQS) relies on information from the California Air Resources Board and the San Diego Association of Governments to predict future emissions and determine the strategies necessary to reduce air pollutant emissions. The RAQS is updated regularly to account for land use changes. The fact that the proposed BASASP is not entirely consistent with the assumptions factored into the current version of the RAQS does not mean that associated project emissions will not be accounted for or mitigated. The identified mitigation to ensure project consistency is to provide the land use changes to the San Diego Air Pollution Control District for the next update to the RAQS (AQ-1). This is standard practice for all local jurisdictions as part of the RAQS update process and does mean that the City is changing the rules or increasing the regional emissions inventory to downplay project impacts.

AE-32 The proposed BASASP would create a mixed-use village that would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

9	Other Issues
9.1	<u>Are Mixed-Use Village Homes Affordable?</u> How many people who are employed in the proposed mixed use village will be able to afford housing within the village?
9.2	<u>Services</u> The PEIR acknowledges that Fire/Police/Emergency services are failing to attain their existing goals. Why are no mitigators proposed?
9.3	<u>Schools</u> An inventory of schools is presented with no analysis. How many new students will seek to fill how many vacant desks at which schools? Are mitigators necessary?
9.4	<u>Water Availability</u> Drought is an existential threat to Southern California. The San Diego Public Utilities Department predicts that water availability for the rest of the city will not be impacted by this Specific Plan. They use innumerable charts and rhetoric to express faith in their own predictions. This feels like <i>hubris</i> ; I hope that the PUD analysis is well audited. (Ref: 5.14)

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AE-32 (cont.)

Transit-oriented development encourages the use of alternative forms of transportation to reduce reliance on the private automobile, which in turn reduces air pollutant emissions.

AE-33 The cost of housing is driven by market demands and outside of the purview of CEQA. As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

AE-34 As discussed in Section 5.13.4.1 of the PEIR, implementation of the proposed project would increase the population within the BASASP area, which would increase the demand for fire and police services. However, no new or expanded facilities would be required in order to provide these services. In addition, possible increases to response times are not a physical environmental impact. Consequently, no potentially significant impacts are anticipated, and no mitigation is required.

AE-35 Section 5.13.4.1 of the PEIR includes an analysis of school facilities. While the number of new students cannot be known at this time, the PEIR acknowledges that the increase in population associated with future development pursuant to the proposed project would generate additional students. Future development proposals are required to pay applicable school impact fees per Government Code Section 65995 and Education Code Section 53080. Payment of these fees would fully mitigate impacts on school facilities.

AE-36 A Water Supply Assessment (WSA) was prepared for the proposed project with the results summarized in Section 5.14.4.1 of the PEIR. The WSA was prepared by the City's Public Utilities Department in accordance with industry standard methodology and is based on adopted water supply plans of the Metropolitan Water District of California and the San Diego County Water Authority, as well as the City's Urban Water Management Plan.

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

10	CONCLUSIONS & RECOMMENDATIONS
10.1	<p><u>The Balboa Avenue Station Area Specific Plan should not be approved in its current draft form.</u></p> <p>Former Secretary of State Henry Kissinger was fond of the term “<u>Complete Staff Work</u>.” it “requires individuals to give their best thinking, their best recommendations and their best work.” If Kissinger were to look at this draft PEIR, he would mark it “Incomplete” and send it back to staff.</p> <ul style="list-style-type: none"> • It fails to solve its primary objective. • It fails to expose imaginative solutions, favoring a singular pre-conceived idea. • It does not value the input and participation of its stakeholders. • It creates a partial local solution while needlessly impacting an even broader region. • It disguises the severity of collateral damage. • It exposes the decision makers to embarrassing criticism. <p>This PEIR is “Incomplete Staff Work”. I recommend that it be sent back to staff with clear instructions to propose broad-thinking, imaginative solutions that include plans for funding and implementation.</p>
10.2	<p>A clear message needs to be heard by everyone involved in authoring this Specific Plan: <u>“If you break it you own it. If you can’t fix it, then start over and come back with something better.”</u></p>
10.2.1	<p><u>Mitigation measures need to be designed and in-place, or designed and scheduled with guaranteed irrevocable funding before increased housing density is permitted.</u></p>
10.2.2	<p><u>Inter-agency lack of cooperation is not an acceptable excuse for failure to mitigate.</u></p>
10.3	<p>Elected officials envision that San Diego will evolve into a City of Villages thriving under a Climate Action Plan (CAP). The Balboa Station area should be an early step in that evolution. Results should be measured in terms of reduced total pollutants.</p> <p>This PEIR illustrates the <u>the City is willing to abandon Environmental Stewardship as it moves forward with high-density housing development.</u> That makes a mockery of the name, <i>Climate Action Plan</i>.</p>

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AE-37

AE-38

AE-39

AE-40

AE-37 This comment summarizes some of the issues raised earlier in the letter and makes a general statement that the PEIR is incomplete. The PEIR was prepared in accordance with the CEQA Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000 et seq.). The conclusions and supporting analysis contained in the PEIR are supported by substantial evidence contained in the record. Impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, the PEIR identifies mitigation measures that would avoid or reduce impacts and discloses where impacts cannot be mitigated to less than significant.

AE-38 As stated in Response AE-37, the PEIR was prepared in accordance with CEQA. It identifies mitigation measures for potentially significant impacts and discloses where impacts cannot be mitigated to less than significant. Future project-specific development proposals implemented under the BASASP would require subsequent approval. Future projects would be evaluated for consistency with the PEIR and associated potential impacts and would be required to implement applicable mitigation measures contained within the PEIR.

AE-39 Please see Response AE-16.

AE-40 The BASASP is proposed to help implement the goals and objectives of the Climate Action Plan by increasing employment and housing opportunities near transit, promoting walking and bicycle use as viable travel choices, and improving transit access. In addition to encouraging higher development intensities within a designated Transit Priority Area and in proximity to the Balboa Avenue Station, the proposed BASASP contains specific recommendations for multi-modal improvements that would facilitate access to transit and reduce resident and visitor reliance on single-occupancy vehicles, which in turn reduces air pollutant emissions regionwide.

COMMENTS

RESPONSES

George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

AE-41	10.4	The need for <u>pedestrian/bicycle connector between the new dense development and the Balboa Trolley Station must be addressed.</u>
AE-42	10.5	San Diego must consider refunding the Sustainable Growth Council (SGC) grant of \$786,832. <u>This plan has failed to significantly increase the use of alternative transportation modes.</u>
AE-43	10.6	Clairemont has tried to speak, but was anyone willing to listen? Inconsistent process and lack of meaningful community outreach during the development of this Specific Plan and its Environmental Impact Report are of great concern. <u>Does a flawed process invalidate this plan?</u>
AE-44	10.7	The Specific Plan may <u>highlight</u> opportunities to the Clairemont Plan Update Subcommittee, but it should <u>not mandate</u> the demolition or permanent re-purposing of any city street for uses other than automobile traffic. This recommendation applies to Clairemont only, and specifically refers to <u>conversion of a Morena Boulevard traffic lane into a Class IV Bicycle Track.</u>
AE-45	10.8	<u>A better analysis of impacts to city services, public safety, and schools need to be conducted.</u> Mitigators should be identified and implemented.
AE-46	10.9	The Balboa Trolley Station may itself become an amenity or nuisance for our communities. But data in this EIR proves that <u>collateral damage from the proposed "TOD Village" will create a purposely-unmitigated disaster.</u>
AE-47	10.10	The Metropolitan Transit System (MTS) must communicate with Clairemont.
AE-48	<p>It may not be obvious that I support the connection of dense housing to our new Balboa trolley station. These pages are the product of much thought. I would not have devoted this much time and effort if I did not want to help create a world-class Balboa Avenue Station Specific Plan.</p> <p>This Specific plan has significant flaws; I cannot in all good faith recommend it to my neighbors. Some flaws are specific to its scope, others are more systemic. It repeatedly suffers from binary thinking, i.e. "the only other choice is to do nothing." Discussion seems contrived to support that conclusion. Regrettably, given that binary choice, I would select the one that does the least harm to Clairemont — "Do Nothing."</p> <p>I still have hope that we can accomplish much more than nothing. The Balboa Trolley station should be a neighborhood asset, not a nuisance in our backyard. Please help me to find reasons to change my recommendation.</p> <p>Respectfully submitted, May 29, 2018 George Henderson</p> <p>Page 16 of 22</p>	

AE-41 Please see Response AE-11 for connectivity to the Balboa Avenue Trolley Station.

AE-42 Please see Response AE-10.

AE-43 Please see Response AE-6.

AE-44 Please see Response AE-27.

AE-45 Please see Responses AE-34, AE-35, and AE-36.

AE-46 The PEIR discloses where impacts cannot be mitigated to less than significant. In those cases, impacts are considered significant and unavoidable because mitigation measures do not exist or are considered not feasible to reduce impacts to less than significant. Refer to Response AE-4 for additional details. The City prepared a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093, which must be prepared when significant and unavoidable impacts remain after changes or alterations are applied to a project. The Statement of Overriding Considerations provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental impacts.

AE-47 Please see Response AE-12.

AE-48 This comment includes closing remarks and general statements about the Specific Plan content. As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

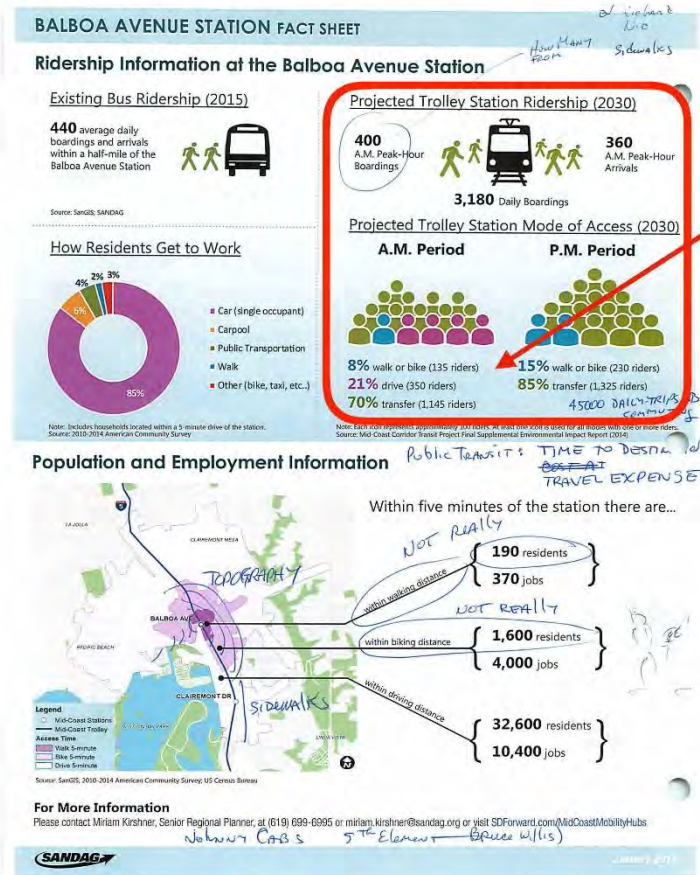
George Henderson Comments
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11	ATTACHMENTS:
11.1	SANDAG Mobility Hub Presentation, 01-31-2017 (annotated)
11.2	Sustainable Growth Council award for preparation of "Balboa Station Plan" 06-03-2014 (Page# 7 of 8)
11.3	Morena Corridor Specific Plan Process (from "Clairemont Engaged", 01/10/2017)
11.4	Clairemont Community Plan Update Process
11.5	Agenda for BASASP - Clairemont Sub-Committee Meeting, 07/19/2017
11.6	G Henderson email re: Community Input for PEIR Scope , 07/05/2017
11.7	G Henderson email re: Not Linked to Clairemont on Planning Department Website plus other comments, 01/22/2018

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11.1 SANDAG Mobility Hub Presentation, 01/31/2017 (abridged, annotated)



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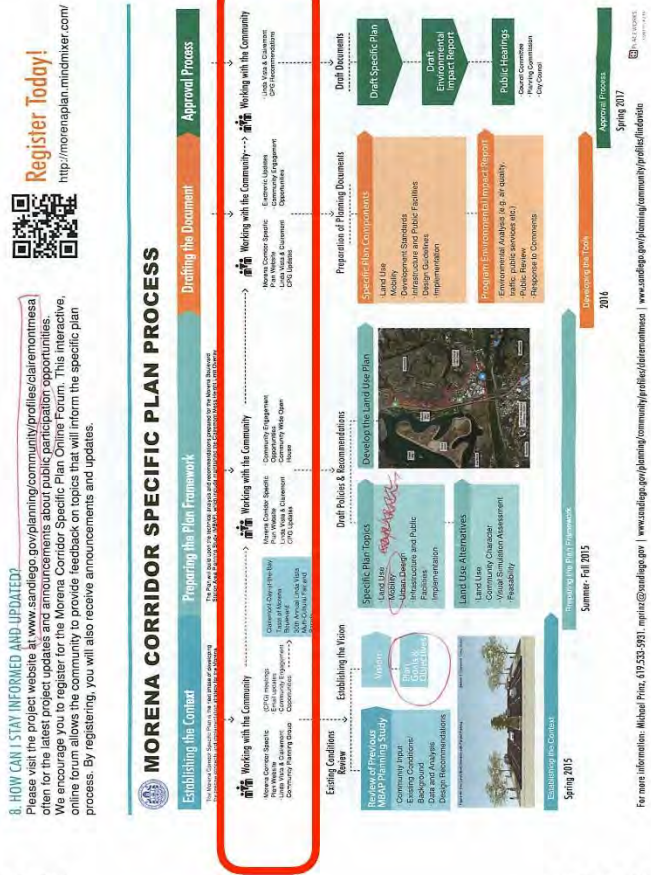
11.2 Sustainable Growth Council award for preparation of "Balboa Station Plan" 06-03-2014 (page 7 of 8)

6/3/2014

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George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

11.3 Morena Corridor Specific Plan Process (abridged, annotated)



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Balboa Avenue Station Area Specific Plan — Draft PEIR

11.4 Clairemont Community Plan Update Process
from "Clairemont Engaged", 01/10/2017 (abridged, annotated)



**11.5 Agenda for Balboa Station Area Specific Plan -
Clairemont Sub-Committee Meeting, 07-19-2017**

DRAFT Agenda	
Clairemont CPG Ad Hoc Subcommittee – Balboa Station Area Specific Plan	
Wednesday, July 19, 2017	
St. David's Episcopal Church (Mission Room), 5050 Milton St	
6:00 PM	
(all times approximate)	
1. Call to order; introductions; sign in. (6:00pm)	Mark Hickey
2. Non-Agenda Public Comment (6:05)	John S. Brown
3. Specific Plan Process Update (6:10)	Donna Billy
4. Mobility Concepts (6:20)	Chris Jones
5. Urban Design Concepts (6:45)	
6. Public Comment (7:00)	
7. Next Steps (7:30)	
8. Adjourn (8:00PM or earlier)	

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George Henderson Comments
Balboa Avenue Station Area Specific Plan — Draft PEIR

11.6 G Henderson email re: Community Input for PEIR Scope, 07/5/2017

From: George Henderson <george.henderson@gmail.com>
Subject: City Moving Forward with EIR Scoping for Balboa Station
Date: July 5, 2017 at 3:38 PM
To: Michael Prinz <MPrinz@sanidiego.gov>
Cc: Harry Backer <hbacker1850@yahoo.com>, Susan Mounian <smounian@gmail.com>

Michael, I am concerned about this public notice was published today by the City of San Diego (see attached).

San Diego appears ready to begin EIR Scoping for zoning changes related to the Balboa Avenue Trolley Station area. This seems odd, since the Clairemont Community Planning Group Ad-Hoc Committee for the Balboa Station Specific Plan has not held a meeting since January 31, 2017. And that meeting was simply a presentation about "Mobility Hubs".
(JOINT MEETING, 1/31/17)

Pacific Beach has a similar sub-committee that may be further progressed than Clairemont's, but frankly this EIR revelation comes a quite a surprise. Perhaps I need some education about the process, but it seems like this scoping meeting is a steamroller that should not yet be moving forward. The Planning department's work with Clairemont's Ad-Hoc Committee for the Balboa Station Specific Plan has been particularly dissatisfying, and certainly feels inadequate and incomplete.

Did I miss a vote or something? Could you please contact me so I can understand what is going on?

Thanks

George Henderson
858-752-2016


PN 1619
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11.7 G Henderson email re: Balboa Station Specific plan Not Linked to
Clairemont on Planning Department Website, 01/22/2018

From: George Henderson <george.henderson@gmail.com>
Subject: Public Comments Close on January 25 [sic], 2018? Balboa Station Area Draft Specific Plan
Date: January 22, 2018 at 5:19:46 PM PST
To: Michael Prinz <MPrinz@sanidiego.gov>

Good afternoon Michael!

I could not find any mention of the Balboa Station Area Specific Plan in the "Clairemont Profiles" portion of the Planning Department's website. The draft document resides only in "Pacific Beach Profiles" where I was dismayed to read that public comments will close on January 26, 2018. I sincerely hope that this deadline applies only to the Pacific Beach portions of the Draft Plan; Clairemont has waited patiently, we have not yet been properly prepared to understand and generate useful comments about the draft document.

Last week, Clairemont's ad-hoc sub-committee had its first meeting since last July. More than one hundred residents attended... clearly the Clairemont community is eager to ask questions, but but we "ran out of time." (Note that this first meeting in six months was held only six business days before the Draft Specific Plan's public comment period will expire in Pacific Beach.)

There are obviously many remaining concerns about the Draft Specific Plan, all of which need to be discussed openly in public forums. May I suggest that the next meeting(s) focus upon development of a shared understanding. If beneficial results are more important than artificial deadlines, informed critique will generate relevant and useful comments.

Sincerely,
George Henderson

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COMMENTS

RESPONSES

Rebecca Malone,
Environmental Planner,
City of San Diego Planning Department,
9485 Aero Drive, MS 431,
San Diego, CA 92109
planningceqa@sandiego.gov

Subject: Comment on Balboa Avenue Station Area Specific Plan Project No. 586601 / SCH
No. 2017071007

From: William Merrill
2670 Magnolia Ave.

San Diego CA 92109-4845

Comment on environmental impacts: Traffic, Environmental, Lifestyle, Geological Appropriateness,
Flooding, Loss of Affordable Housing, Cultural Losses due to up Zoning, No Safe Way for Pedestrians to
get to Trolley Station,.

Traffic Impacts

The Increased Densities of this plan will cause an increase in traffic crossing, entering and exiting ; Grand
Mission Bay Dr. and Garnet. This crossing traffic will slow traffic passing through the Plan area to get to
west Pacific Beach, Mission Beach, and La Jolla. Residents of Pacific Beach, Mission Beach, and La Jolla
must pass through the Plan area on Mission Bay Dr., Grand, and, or Garnet, to get to their homes. There
is grid lock on these streets for a couple hours in the morning and a couple hours in the afternoon. The
backup causes traffic to stop on S. Beaches Garnet off ramp.

Pacific Beach, Mission Beach, and La Jolla are growing. The traffic from them is coming and will continue
to grow.

Visitors come to our beautiful beaches by the tens of thousands. Just a beautiful summer day can cause
our traffic to stop from grid lock.

We have traffic problems now solve them before you add to them with nearly 4,000 more units

The air quality will be adversely affected by thousands of cars idling while they wait to get through
traffic.

Plan renderings depict traffic calming features that are intended to slow traffic. In my neighborhood we
need cars to get moving when they get a green light.

AF-1 Please see Response B-1 regarding traffic and the Balboa Avenue
Station Area Specific Plan Public Comment Summary memo regarding
residential densities in the BASASP area.

AF-2 Section 5.2, *Air Quality*, of the Program Environmental Impact Report
(PEIR) analyzes potential air quality impacts of the Balboa Avenue
Station Area Specific Plan (BASASP) and identifies potentially significant
air quality impacts associated with construction and operational
emissions. Vehicular emissions are only one source that contributes to
the identified air quality impacts, as detailed in Table 5.2-6 of the PEIR.
The PEIR identifies mitigation to reduce air quality impacts (AQ-2
through AQ-4), but the ability of future development to successfully
implement the actions to fully meet the identified mitigation cannot be
guaranteed at the program level. Thus, the PEIR concludes air quality
impacts are significant and unavoidable even though such impacts
associated with future development proposals implemented under the
BASASP may be less than significant or mitigated to below a level of
significance with the identified mitigation.

AF-3 This comment makes a general statement about driving behaviors. As
this comment does not raise any environmental issues with respect to
the adequacy of the Draft PEIR, no further response is required.

COMMENTS

RESPONSES

AF-4

We need to close Rosewood at Mission Bay Dr. before people die in the back up on Freeway 5 S.

AF-5

Street parking will not be increased but people looking for street parking will be increased greatly. The problem will need to be mitigated by parking structures. Sometimes they can become a huge expense to residents if a business gets involved to make a huge profit.

Environmental Impacts

AF-6

The increase in Density will mean the loss of most of our yards' environmentally significant Landscapes. The current zoning setbacks provide for small but not insignificant environments in our neighborhood. We have a considerable variety of wildlife in our yards and trees. We have possums on our fences. A family of raccoons lives in one of our palm trees. I have seen a passing coyote. We have alligator and fence lizards. I have seen a small insect eating snake and a garter snake. We have numerous birds both local and migratory ranging from eagles to humming birds. We have a huge variety of wild life in the plan neighborhood There is a web of life that supports its' self on our small yards. This habitat has developed over 70 years and is a whole web of life. It is an environmental wealth. The loss of our yards to development will devastate this existing environment.

AF-7

Rose creek between Grand and Garnet is a near miracle of natural recovery. It came back from being bulldozed and lined with riprap and concrete to become a rich, vibrant, intertidal zone habitat. It has become a multispecies fish hatchery, a salt grass meadow, and home to a huge number of both local and migratory birds. If you add significant population and increase foot traffic on the rose creek trail you will add to the number of people walking on the salt grass meadow and cutting across a shortcut across the creek on a rock bridge this is hard on the creek environment. Some people can be hard on the creek. They love it to death.

AF-8

At my property, at 2670 Magnolia, we have the largest tree in the neighborhood, a Norfolk Island pine tree more than 50' tall. We also have a 20' and 30' fruiting Eugenia hedge, a small orchard of dwarf fruit trees and a fence of grape vines. In my pine tree up to thousands of birds will, eat, roost, and sing. The tree is a significant environmental resource. The hedge supports hundreds of birds in fruiting season. The hedge supports a whole web of life; insects, spiders, humming birds, butter flies, and fence lizards. The orchard is so attractive to life that our county's department of agriculture will regularly hang insect traps in it looking for invasive species. My yard and most of my neighbor's yards are here because of zoning setbacks. If we lose our yards to redevelopment we will lose a complicated web of life that has been established here over more than 70 years.

Life Style loss.

AF-9

I bought here twenty years ago. I valued the residential character, stable zoning, and environmental beauty, and rich community values. I raised my children here with my neighbor's children. We want to grow old here and have our children grown old here. We are here for the long haul.

AF-4

While this intersection currently experiences traffic congestion during peak hours, a traffic signal will be installed at this intersection in conjunction with the Jefferson Mixed Use Residential Project, located at 4275 Mission Bay Drive. As identified in the Traffic Impact Study prepared for the project (which is included as Appendix K to the PEIR) and Section 5.15.6 of the PEIR, this intersection is not anticipated to result in significant impacts with the project. Consequently, no improvements to this intersection are proposed.

AF-5

Future development proposals within the BASASP area would be required to provide adequate on-site parking in accordance with the City's parking standards such that the demand for on-street parking would not increase.

AF-6

Mitigation is identified in Section 5.3 of the PEIR to protect sensitive biological species present within the BASASP area (BIO-1 through BIO-5). Future development proposals within the BASASP area would be required to implement these measures, as applicable.

AF-7

As discussed in Section 5.3 of the PEIR, the proposed project would avoid impacts to wetlands, including Rose Creek. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area.

AF-8

Please see Response AF-6.

AF-9

The project entails the adoption of a Specific Plan, which does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. While some areas within the BASASP would be re-designated for mixed-use transit-oriented development, future project-specific development proposals implemented under the BASASP would

COMMENTS

RESPONSES

AF-9
(cont.)

I have a neighbor that has lived here more than 70 years and raised a family here. My neighbor and her family are here for the long haul. Across the street we have a family that has been here for more than 50 years. Across bond and down the block we have a family that has been here more than a hundred years

There is a wealth of community here. There is neighbor helping neighbor for everything from shopping trips to yard work. Some of this help is essential for living alone. Without the help of neighbors, many of my neighbors would much sooner end up in nursing homes. Redevelopment will mean a total loss of lifestyle for some of us. Community means to me; living together, being friends, helping each other, raising our children together and growing old together. Redevelopment is a threat to the very fabric of our community.

The Geologic appropriateness of the Zoning plans.

There two geological factors that make building multi floor buildings inappropriate in the plan areas. The first one is the rose canyon fault, it passes directly underneath the plan area. The second one is the low area west of Mission Bay dr. is subject to liquefaction during an earth quake due to deep sand and a high water table.

The rose canyon fault is active and has given San Diego a pretty good shake in recent history although before the invention of the seismometer. It will give us a good shake again we just don't know when.

The area west of Mission Bay Dr. is built on a river's sand plane. The river brings a high water table and fine sand. When an earthquake shakes the mix of sand and water it becomes liquid and the ground moves violently in waves. Multistory buildings do not do well during liquefaction. I let no one live in the side of my house next the two story building. Multistory building are not appropriate here. A small earthquake elsewhere could be a big liquefaction event here like what happens to Mexico City.

Street Flooding

When you develop an area to these densities, the area of roof and pavement that drain to the street are greatly increased.

On multiple occasions I have seen the street flooding rise along bond and overflow my gutter along Magnolia. The street flooding along Bond has nearly reached peoples doors. With increased densities we will have flooding during extreme rain events. Who knows how extreme the rain storms will be. We must be prepared for the worst.

Loss of affordable rentals

The bulk of remaining affordable rentals in Pacific Beach lie in the plan area's greatest increase in densities. The plan will result in this housing being torn down and replaced with high end rentals. Affordable housing will not be included just like all the other developments they will just pay the surcharge and build high end units. Many of the people living in the plans greatest high density up zoning have lived here all their lives and plan to live here the rest of their lives. When there no more units affordable to working people, they will continue to live here just on the streets.

AF-12

AE-9 (cont.)

require subsequent approval and would be evaluated for consistency with the PEIR and associated potential impacts.

It should be noted that the California Environmental Quality Act (CEQA) does not require analysis of economic or social effects pursuant to Section 15131 of the State CEQA Guidelines such as those related to (among other things) quality of life and lifestyle.

AE-10

Section 5.5, *Geology and Soils*, of the PEIR includes discussions of seismic-related fault rupture, ground-shaking and -lurching, seismic settlement, and geologic stability. The analysis, based on a geotechnical study (Appendix D to the PEIR), concluded that with conformance to applicable regulatory/industry standard and codes, impacts would be less than significant, and no mitigation is required.

AE-11

As discussed in Section 5.9.4.1 of the PEIR, future development within the BASASP area would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. This would result in a reduction in runoff rates and volumes compared to the existing condition because of the current regulations that are more restrictive than those that were in place when existing development was constructed. In addition, the proposed BASASP contains polices to encourage storm water retention facilities and incorporation of storm water best management practices to minimize storm water runoff.

AF-12

As stated in Response AF-9, the proposed project does not include specific development proposals, but provides the policy framework and land use controls to guide future development within the BASASP area. While some areas within the BASASP would be re-designated for mixed-use transit-oriented development, the assertion that existing housing would be replaced with "high-end rentals" is speculative. The BASASP contains specific policies to provide a diversity of housing types and affordable housing." For example, Policy 2.1.5 states, "Support diverse, balanced, and affordable housing." Policy 2.1.8 states, "Encourage the development of affordable and senior housing units at different income levels."

COMMENTS

RESPONSES

AF-12
(cont.)

This is one of the big mistakes made during the gas lamp redevelopment. There were thousands of people living in affordable single room occupancy apartments. They were kicked out to turn the buildings to high end hotels. They are still living on the streets downtown more than 25 years later. Affordable housing is a problem that won't go away.

You can't have the contractors solve the problem or it will be like liberty station where the contractor's executives took their pay in stock options so they could qualify for affordable housing and all the affordable units went the contractor's executives.

Cultural losses due to up zoning

AF-13

The first loss I can think of is Rubio's No 1. It has been here for nearly forever and has fed generations of us. This business is the foundation and start of a food empire. Once rezoned its demise is inevitable. It will be just like Jack in the Box No.1 in North Park it will be torn down in the middle of the night then it will be gone. It will be more profitable to redevelop then to run the business.

AF-14

The new Chase Bank will be torn down for the same reason. It is a beautiful and notorious building. Its mosaics depict a past time in San Diego. The banking con-artists that built this building for their corporate head quarters sent their wives around the world buying marble and art for this building. When we lose this building we will lose a thing of beauty. The loss of beauty is something we should consider.

AF-15

Our community has many, long term business, that rent or lease. Many of them have been here for longer than I have. They have stable rents due to stable zoning. When you up zone the owners rebuild and kick out the business.

This rezoning will mean the loss of most of our neighborhood business.

AF-16

No Safe Way to get to Trolley Station

It is funny that this plan says it's about the trolley station, because it provides no safe way to get to the trolley. To get to where the trolley station will be you will have to go under 5 bridges with narrow sidewalks and across one high speed freeway off ramp where the cars don't stop and have trouble seeing you. There are no handicap ramps and I would not advise a wheelchair to cross the freeway ramp. You just can't run fast enough to avoid the speeding cars.

Where is the foot and bicycle, bridge or tunnel? How are we to get there safely?

AF-13 Section 5.7, *Historical and Tribal Cultural Resources*, of the PEIR identifies historic buildings within the BASASP area based on a review of South Coastal Information Center records search data, the City's Historical Resources Register, the California Register of Historic Places, the California Historical Landmarks List, California Historical Points of Interest List, and the National Register of Historic Properties. Research and a field study were also conducted by architectural historians to identify buildings greater than 45 years of age with a demonstrable potential for significance. Based on this evaluation, the Rubios building is not considered a historic structure.

AF-14 As discussed in Section 5.7.1.2 of the PEIR, the Chase Bank building is identified as a potential historic building even though it is not more than 45 years in age due to the mural mosaics by noted artist Millard Sheets that depicts the history of San Diego. The PEIR concludes that impacts to this building could be significant if future development in conjunction with the BASASP would affect this building. Mitigation is identified in the PEIR (HIST-1) that would reduce impacts to the potential resource.

AF-15 The project proposes to re-designate some areas within the BASASP area to Community Village. This re-designation would allow for future redevelopment with transit-orientated development pursuant to the proposed land use designation and zone classification. The BASASP does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. The assertion that such redevelopment would displace most existing businesses upon full implementation of the BASASP is speculative and CEQA does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145. Moreover, CEQA does not require analysis of economic or social effects pursuant to Section 15131 of the State CEQA Guidelines.

COMMENTS

RESPONSES

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AF-16 Please see Response AE-11 for connectivity to the Balboa Avenue Trolley Station.



Pacific Beach Planning Group

www.pbplanning.org

June 8th, 2018

To: Alyssa Muto, Deputy Director, City of San Diego Planning Department
Rebecca Malone, Environmental Planner, City of San Diego Planning Department
PlanningCEQA@sanidiego.gov

Re: Project Name: Balboa Area Transit Specific Plan
Project No: 586601/SCH No. 2017071007
Community Area: Pacific Beach
Council District: 2

Dear Alyssa and Rebecca,

Thank you for the opportunity to gather our community and allow for all voices to be heard in preparation for this response. As Pacific Beach ascends into a certified EcoDistrict, we continue to strengthen our community fabric through inclusivity and engagement and represent a collective voice of the Pacific Beach business, resident and visitor communities.

Our process in this response preparation included (4) PBPG EcoDistrict Sub-Committee meetings and (1) PBPG Special Meeting. All participants in these meetings were engaged, spirited, and thoughtful. All meetings were posted and open to the general public.

The PBPG extends our community's continuous willingness to collaborate with the City of San Diego Planning Department to maximize the full potential of this opportunity to benefit the future of Pacific Beach and the City of San Diego.

Please accept the following responses to the BATSP EIR PIER:

Environment:

o **Item 1:** PBPG supports vacating the listed paper streets (portions of Pico, Magnolia, Hornblend) (**Addendum 1**) and dedicating the Rose Creek parcels listed in the Friends of Rose Creek comment letter dated January 23, 2018 (**Addendum 2**) as dedicated parkland with a dedicated funding source supporting ongoing maintenance to create a greenbelt which is needed for adding this much population. A development strategy focused on the appreciation and sustainable usage of Rose Creek as a showcase river-walk with a mix of culture commercial and retail businesses that serve the needs of visitors, residents, and commuters, with an emphasis on non-vehicular modes of transport on both sides of the estuary and which honors and celebrates the indigenous heritage. Addendum 1.

o **Item 2:** PBPG requests the City to integrate the watershed planning principles identified in the *Rose Creek Watershed Opportunities Assessment* document http://www.rosecreekwatershed.org/wp-content/uploads/2015/01/FINAL_Assessment_Summary.pdf previously approved by the City Council (2008) into the entire BATSP Project to protect and enhance the environment with sustainable development.

AG-1

AG-2

AG-1 The Balboa Avenue Station Area Specific Plan (BASASP) does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek regarding City-owned property ("paper streets").

AG-2 As discussed in Section 5.9.4.1 of the PEIR, future development within the BASASP area would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual to minimize water quality impacts. In addition, the proposed BASASP contains polices to encourage storm water retention facilities and incorporation of storm water best management practices to minimize storm water runoff and associated water quality impacts.

COMMENTS

RESPONSES

AG-3	<p>Mobility:</p> <p>o Item 3: PBPG requests that the Mayor and City representatives @ SANDAG advocate for improved transit performance specific to bus routes and trolley schedules, including increased frequency and reliability to support effective ridership of the Mid-Coast Trolley from the Balboa/Pacific Beach Transit Station.</p>	AG-3	This comment requests political advocacy for improved transit services but does not raise any California Environmental Quality Act (CEQA)-related issues. No further response is required.
AG-4	<p>o Item 4: PBPG requests the City of San Diego to aggressively pursue grants including TIGER, SANDAG and all others, to support implementation of all BATSP mobility projects.</p>	AG-4	This comment requests City staff to pursue funding to implement mobility improvements but does not raise any CEQA-related issues. No further response is required.
AG-5	<p>o Item 5: PBPG requests that the City of San Diego implements Vision Zero policies, strategies, and innovative technologies throughout the project area to ensure safe, connected, reliable mobility. https://www.sandiego.gov/vision-zero/strategic-plan</p>	AG-5	The BASASP includes pedestrian and bicycle improvements to provide improved safety and mobility within the BASASP area, which is consistent with the intent of the City's Vision Zero Strategic Plan.
AG-6	<p>o Item 6: PBPG requests that the City of San Diego prioritize construction of a multi-use path overpass or underpass from the Balboa Transit Station across I-5 to Magnolia Street.</p>	AG-6	The BASASP includes a policy (Policy 3.1.4) to support the San Diego Association of Governments (SANDAG) and the San Diego Metropolitan Transit System (MTS) to consider a bicycle and pedestrian access via a connection across I-5 from the Balboa Avenue Trolley Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park and Mission Boulevard. Identification of funding sources and implementation of the facility would require further coordination by SANDAG and MTS.
AG-7	<p>o Item 7: PBPG asks the City of San Diego to complete the widening of Balboa Avenue under Interstate 5 to ensure safe pedestrian and bike routes both BEFORE and CONCURRENT with the trolley station opening. Create and fund as a CIP project ASAP.</p>	AG-7	Upon completion of the BASASP, all identified improvements will be added to the Transportation Needs List to compete for funding.
AG-8	<p>o Item 8: PBPG requests the City of San Diego, SANDAG, and MTS collaborate to implement low/no-emission shuttles from the station to/from neighboring communities both BEFORE and CONCURRENT with the trolley station opening.</p>	AG-8	This comment requests implementation of low/zero emission shuttles to trolleys but does not raise any CEQA-related issues. No further response is required.
AG-9	<p>o Item 9: PBPG requests the City of San Diego to implement better connections across Grand Avenue from E. Mission Bay Drive, including but not limited to: pedestrian treatments on the golf course side of Grand. The planned crossings at Rosewood from the east side of East Mission Bay Drive currently put pedestrians and bicyclists in a dangerous situation.</p>	AG-9	The BASASP includes connections crossing Grand Avenue at Mission Bay Drive and Rosewood Drive, with receiving areas and sidewalk connections for pedestrians on both sides of Grand Avenue.
AG-10	<p>o Item 10: PBPG requests the City of San Diego eliminates street parking along E Mission Bay Drive and implement a protected bicycle facility BEFORE and CONCURRENT with the trolley station opening.</p>		
AG-11	<p>o Item 11: PBPG requests the City require "MUST STOP ON RED" @ E Mission Bay Drive and Balboa/Garnet, all directions. Protect the Pedestrians and Cyclist first.</p>		
AG-12	<p>o Item 12: PBPG asks the City of San Diego to implement signalization and/or other improvements (e.g. pedestrian and bicycle overpass) at Garnet/Balboa and East Mission Bay Drive to prioritize pedestrian and bicycle safety over vehicular traffic.</p>		
AG-13	<p>o Item 13: PBPG supports throughout the BATSP: pocket parks, adequate land easements from traffic and complete sidewalks from station to all closest neighborhoods.</p>		
AG-14	<p>o Item 14: PBPG to requests the City of San Diego to analyze specific projects for the proposed bike/pedestrian overpass over I-5 west from the trolley station including specifically: bridge or tunnel or "Skyfari" approach to include costs.</p>		
AG-15	<p>Housing/Commercial/Light Industrial Density:</p> <p>o Item 15: The PBPG supports increasing residential density in the Plan up the 30' Coastal Height Limit with appropriate development strategies supporting the Pacific Beach EcoDistrict principles.</p>		

COMMENTS

RESPONSES

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- AG-10 This comment does not raise any CEQA-related issues. No further response is required.
- AG-11 This request will need to be evaluated by the City's Transportation and Storm Water Department. Please submit this request using the City's Get It Done portal (<https://getitdone.force.com/TSWNewReport?type=Other>).
- AG-12 The BASASP has identified several improvements to the intersection of Garnet/Balboa and East Mission Bay Drive to integrate non-vehicle modes of travel, including paths buffered from vehicle travel, dedicated bicycle lanes, and high-visibility crosswalks.
- AG-13 The City acknowledges this comment in support of the BASASP parks and sidewalk components.
- AG-14 Please see Response AG-6.
- AG-15 Future development pursuant to the BASASP within the Coastal Zone and/or Coastal Height Limit Overlay Zone would be subject to a height limit of 30 feet. Additionally, the BASASP includes policies within the Land Use, Mobility, Urban Design, and Conservation Chapter that are consistent with the EcoDistrict principles.

COMMENTS

RESPONSES

AG-16

o **Item 17:** PBPG requests the City of San Diego disclose the calculations used to determine the proposed DU/AC (Dwelling Units per Acre) for residential, commercial, and light-industrial square footage increases including anything related to housing affordability and job opportunities. (Per Addendum 2)

AG-17

o **Item 18:** The PBPG requests the City of San Diego to disclose whether they have a formula for variability in typology and what is it with respect to residential units to ensure a variety of options for a wide socioeconomic range of residents.

AG-18

MOTIONS 19- 22 submitted by Karin Zirk:

ITEM 19: As Rose Creek is referenced in the Draft PEIR 122 times and is identified as the "open space" for the proposed village, all portions of Rose Creek within Pacific Beach need to be added into the BASASP planning area and the DRAFT PIER should be recirculated.

AG-19

ITEM 20: The Final PEIR should include a special design element for properties adjacent to the creek requiring planting a native plants hedgerow as the preferred buffer for all future development of parcels along Rose Creek.

AG-20

ITEM 21: The Final PEIR should identify Rose Creek in Pacific Beach as the preferred mitigation site for all impacts. There are multiple opportunities for Diegan Coastal Sage Scrub mitigation along Rose Creek between Grand Avenue and Mission Bay Drive as well as fresh and salt water riparian opportunities.

AG-21

ITEM 22: How much vehicle traffic would be re-directed to bike/pedestrian traffic and be routed away from the intersection of Mission Bay Drive/East Mission Bay Drive and Garnet/Balboa Avenues by building the proposed bridge over I-5 identified in the BASAP as well as the proposed Bike Bridge at Hwy 52/I-5 as mitigation for cumulative vehicle traffic impacts in this area?

All in favor: 6-0-1 HP Abstain

AG-22

MOTION TAKEN SEPARATELY: MOTION KV/PG


o **Item 16:** PBPG to support increased height limit above 30' within the BASASP boundaries with appropriate development strategies supporting the Pacific Beach EcoDistrict principles.

All in favor: 0-6-2 Ben Ryan and HP abstained late

AG-23

MOTION CDC/JL: PBPG requests the City of San Diego analyze a lower density alternative in between the No Project and the Medium Density Alternative and recirculate the EIR. 5-2-1; opposed KV/PG; Abstain: HP

Respectfully,



Kristen Victor
PBPG EcoDistrict Sub-Committee Chair



Henish Pulickal
PBPG Chair

Attachments: Addendum 1, Addendum 2, Addendum 3

AG-16 Please see the Balboa Avenue Station Area Specific Plan Proposed Build Out Assumptions memo regarding build out assumptions used in the Draft PEIR.

AG-17 The assumptions for residential build out in the BASAP only differentiate between anticipated single-family and multi-family residential units.

AG-18 The BASASP includes only a small portion of Rose Creek within Pacific Beach, which includes the area west of Interstate 5, north of Damon Avenue, and east of Mission Bay Drive. The remaining portions of Rose Creek within Pacific Beach are not included in the BASASP. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area.

AG-19 Future development within the BASASP areas adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines to avoid indirect impacts and edge effects to Rose Creek.

AG-20 As detailed in Table 5.3-6 of the PEIR, implementation of the BASASP would not impact wetlands and only a minimal amount of sensitive upland vegetation communities because the BASASP areas is almost entirely developed. The PEIR contains mitigation framework to reduce impacts to sensitive upland habitats (BIO-6). Specific mitigation sites for impacts from future development proposals will be determined on a project-by-project basis at the time each development proposal is undergoing City review.

AG-21 Construction of the noted pedestrian/bicycle bridges is not being proposed nor required as mitigation for cumulative traffic impacts of the proposed project. As such, the question about traffic diversion is not relevant.

COMMENTS

RESPONSES

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AG-22 Please see Response AG-15.

AG-23 In addition to the No Project Alternative: Adopted Community Plan and Medium Density Alternative that were evaluated in the PEIR, Section 10.4 in the PEIR identifies a Low Density Alternative that was initially considered to reduce environmental impacts. A description of this alternative and the reasons why it was not carried forward for further consideration is contained in Section 10.4.

Addendum 1

Rose Creek and Adjacent Paper Streets



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Addendum 2



Friends of Rose Creek *
"Connecting Our Communities"
4629 Cass Street #188
San Diego CA 92109



January 23, 2018

Via Email (Mprinz@sandiego.gov)

Michael Prinz, Senior Planner
Planning Department

RE: Balboa Avenue Station Area Specific Plan Draft Dated December 4, 2017

Dear Michael,

Thank you for the opportunity to comment on this project. Rose Creek is the heart of this community and we feel very strongly that by creating a project that recognizes the central role the creek serves in creating our community character, we can enhance the neighborhood for existing and future residents. Unfortunately, the plan as presently written does not do enough for the creek while asking the creek to provide a large number of functions. However, we believe that by incorporating our recommendations, this project can benefit the creek and the neighborhood.

FUNDING

The "Infrastructure Financing Study" should be completed before this plan moves forward in the planning process so that the community can understand the improvements to be made, who will pay for them, and the timeline for implementation before increased housing density is permitted. From funding trashcans along Rose Creek to providing park staff to help

**A member of the Rose Creek Watershed Alliance
*A Friends Group of San Diego Canyonlands, Inc.
Visit us on-line at <http://www.saverosecreek.org>*

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

Page 2 of 9

volunteers manage the creek, funding is the linchpin of this project and needs to be identified prior to furthering this plan.

PARKLAND DEDICATION

In regards to sections 5.1.1, 5.1.2, and 5.1.4, the project plan should dedicate as parkland the following Assessor Parcel Numbers that are publically owned. **In the Pacific Beach Community Plan update of 1992** the community identified Rose Creek as serving the community in the form of open space parkland. The time to take action is as part of the Balboa Ave Station area specific plan. See Table 1 below for a list of parcels in public ownership appropriate for parkland dedication.

Table 1: Rose Creek Parcels

Parcel # ¹	Acres	Notes
Caltrans Paper Street **		Caltrans property to the west of APN 6760100600 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711400 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711300 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711300 to the freeway. Rose Creek and location of Rose Creek Bikeway.
Caltrans Paper Street **		Caltrans property to the west of APN 4245711100 to the freeway. Rose Creek and location of Rose Creek Bikeway.
4245710200 **		Caltrans property to the north of APN 42457102 to the freeway. Rose Creek and location of Rose Creek Bikeway.
4245710200 **	2.39	Flood Control Channel placed on top of creek. Rose Creek and location of Rose Creek Bikeway.

¹ Parcels designated with = are identified in the Pacific Beach Community Plan as being open space parks. Parcels designated with the ** are identified by the Friends of Rose Creek as potential parcels for SANDAG mitigation efforts.

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

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Parcel # ¹	Acres	Notes
4171801500 ^{-**}	13.78	APN owned by Federal Government. Only the Southeast corner is in the creek and has open space on it. The east strip of the entire parcel should be included for upland habitat.
4172504000 ⁻ (On the SANDAG GIS Map this encompasses APN 7601038300) **	3.28	Owned by City of San Diego
7601038300 ^{-**}	.17	Owned by City of San Diego
4172421300 ^{-**}	1.27	Owned by City of San Diego
4172423100 ^{-**}	NaN	Owned by City of San Diego
4172423200 ^{-**}	NaN	Owned by City of San Diego
4172423300 ^{-**}	NaN	Owned by City of San Diego
4172423400 ^{**}	NaN	Owned by City of San Diego
4172422400 ^{-**}	NaN	Owned by City of San Diego
4172421300 ^{-**}	NaN	Owned by City of San Diego
4172421900 ⁻	NaN	Private Property extending into creek. Owned by Don F. Fells. Only dedicate portion in channel if possible.
4172422600 ⁻	NaN	Owned by City of San Diego
4172422800 ⁻	NaN	Owned by City of San Diego
4172423600 ⁻	NaN	Owned by City of San Diego
4172423000 ⁻	NaN	Owned by City of San Diego
4172912300 (Also listed as APN 41729122) ⁻	NaN	Owned by City of San Diego
4172910300 ⁻	NaN	Owned by City of San Diego
4192910200 ⁻	NaN	Owned by City of San Diego
4172910100 ⁻	NaN	Owned by City of San Diego
Pico Street Paper Street south of APN 4172910100 ⁻	NaN	Owned by City of San Diego
4172820500 ⁻	NaN	Owned by City of San Diego
4241020500 ⁻	NaN	Owned by City of San Diego
4241123400 ⁻	NaN	Owned by City of San Diego
4241112800 ⁻	NaN	Owned by City of San Diego
4241020500 ⁻	NaN	Owned by City of San Diego
Pico Street Paper Street East of APN 4241020500 and West of 4241123400 ⁸		Owned by City of San Diego

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

Page 5 of 9

PAPER STREET

As part of the community plan update, the extension of Pico Street south of Garnet should be removed from the planning maps. This paper street currently exists in portions of Rose Creek (south of where Pico and Garnet Avenue intersection through Rose Creek and along Mission Bay High School and are east of APN 4241020500 and West of 4241123400).

LANDSCAPING

In regards to section 4.4.2, the plant palette for any projects in the area should emphasize the Coastal Sage Scrub community. For trees, there should be a focus on natives such as Torrey Pines, Coast Live Oak, Western Cottonwood, and Sycamore where large trees are appropriate. In areas better suited to small trees, the tree pallet should include Coast Scrub Oak, Lemonade Berry, and Toyon. All plant palettes used along the creek should consist solely of plants in the Coastal Sage Scrub community to protect the creek and the creatures that live in and along the creek. Any non-native plants on the CAL-IPC Inventory should be expressly precluded from planting along the creek or within the adjacent neighborhoods (see <http://www.cal-ipc.org/plants/inventory/> for a complete list).

ADDITIONAL PARKS TO SUPPORT ADDITIONAL RESIDENTS

Any additional parks or parklets provided by redevelopment should be publically accessible and include dog use areas. Currently Rose Creek is the only community dog walking area and there are no public playgrounds in the neighborhood. There needs to be dog walking areas and children's playgrounds within the project area outside of the Rose Creek corridor.

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

Page 6 of 9

PACIFIC BEACH ECODISTRICT

Please incorporate the recommendations from the Pacific Beach EcoDistrict into the project plan and require all new development and/or re-development to adhere to the Project Design Guidelines for Pacific Beach EcoDistrict Compatibility (available at <http://beautifulpb.com/wp-content/uploads/2013/02/PBPGEOCDistrictDesignChecklist20161020.pdf>)

GARNET AVENUE BRIDGE

In regards to the proposal to widen the Garnet Avenue Bridge over Rose Creek, we strongly oppose this recommendation. The City of San Diego does not maintain the area under the bridge currently and increasing the width of the bridge will just increase housing opportunities for homeless people. However, the bridge could be redesigned using the following are recommendations:

1. Use the minimum amount of impermeable surface (building footprint, paved driveway, etc.) as practicable.
2. Use flow control structures such as swales, retention/detention areas, and/or cisterns to maintain the existing (preproject) peak runoff.
3. Direct downspouts to swales or gardens instead of storm drain inlets.
4. Use flow dissipaters at runoff inlets (e.g., culvert drop-inlets) to reduce the possibility of channel scour at the point of flow entry.
5. Maintain native shrubs, native trees and groundcover whenever possible and revegetate disturbed areas with local natives.
6. Combine flow-control with flood control and/or treatment facilities in the form of detention/retention basins, ponds, and/or constructed wetlands.
7. Use flow control structures, permeable pavement, cisterns, and other runoff management methods to ensure no change in post-construction peak runoff volume from pre-project conditions for all activities.
8. Stream crossings shall incorporate a free-span bridge unless infeasible due to engineering or cost constraints or unsuitable based on minimal size of stream (swale without bed and banks or a very small channel). If a bridge design cannot free-span a stream, bridge piers and footings will be designed to have minimum impact on the stream.
9. Please perform a hydraulics analysis, demonstrating that widening of the bridge will not cause significant scour or channel erosion.

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

Page 7 of 9

10. Include upland habitat beneath the bridge to provide undercrossing areas for wildlife species that will not enter the creek. Native plantings, natural debris, or scattered rocks will be installed under bridges to provide wildlife cover and encourage the use of crossings.

LIGHTING

Any lighting installed along the creek should follow the guidelines in *A Review of the Impact of Artificial Light on Invertebrates*, Bruce-White, Charlotte and Matt Shardlow, 2011, ISBN 978-1-904878-99-5. Lighting along the Rose Creek Bike Path can have negative impacts to invertebrates and other wildlife if not properly designed.

We would like to see the specific type of lighting included in the Environmental Impact Report (EIR) as the type of lighting used could have significant negative impacts on invertebrates. Certain types of lighting are generally not proposed for use near water bodies. We recommend the use of Low-pressure sodium vapor lamps, also known as sodium oxide lamps (SOX). Red, yellow and amber LED lamps each have a specific, narrower spectrum and have peak wavelengths between 590 and 660 nm, which is less attractive to invertebrates (See Hewes, J. (2009) Light emitting diodes (LEDs), [online]. London, The Electronic Club. Available from: <http://www.kpsec.freeuk.com/components/led.htm>).

Here are some general suggestions to minimize negative impact to biologic resources.

1. Use narrow spectrum light sources to lower the range of species affected by lighting.
2. Use light sources that emit minimal ultra-violet light.
3. Lights should peak higher than 550 nm.
4. Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue short wave length content they should be of a warm / neutral color temperature <4,200 kelvin.
5. Lamps should not emit light at angles greater than 70°.

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

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Because the impacts of night lighting on invertebrates and other wildlife can be quite disruptive, we request that the Plan specify the type of lighting suitable for use along Rose Creek including the specific types of lighting fixtures and lighting technologies with light spectrum, wattage, technology and angles clearly indicated.

CLIMATE ADAPTATION

The State of California Climate Adaptation Strategy requires new planning efforts to address climate adaptation strategies. From Senate Bill 379, "Upon the next revision of the housing element on or after January 1, 2009, the conservation element shall identify rivers, creeks, streams, flood corridors, riparian habitats, and land that may accommodate floodwater for purposes of groundwater recharge and storm water management." As the area between Mission Bay Drive and Rose Creek is in a 500-year flood plan and as sea level rise projections show portions of the project area under water at high tide, restoring the biologic functions of Rose Creek is critical to protecting existing and future development in the project area. In the EIR, please include a detail analysis of sea level rise as part of this project in order to assess areas that are better preserved as habitat to protect developed areas that could otherwise be inundated during heavy storm events and/or high tides scenarios.

PEDESTERIAN IMPROVEMENTS

Please make additional density contingent on pedestrian improvements by assessing developer fees for any density increase and requiring the pedestrian improvements to be made prior to completion of any new projects.

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Addendum 2 (cont.)

Friends of Rose Creek comments on Balboa Ave Station Draft Plan of 01/23/2018 (continued)

Page 9 of 9

On behalf of the Friends of Rose Creek, we thank you for considering these key points to create a Transit Oriented Development Area that benefits rather than harms Rose Creek. When Rose Creek is healthy and well cared for, the surrounding neighborhood will be a desired location for families, young adults, and seniors, as well as those who have lived along Rose Creek for decades.

Deepest regards,



Karin Zirk
Executive Director
Friends of Rose Creek
www.saverosecreek.org

cc: Mayor Kevin Faulconer via email (kevinfaulconer@sanidiego.gov)
Councilmember Lorie Zapf via email (loriezapf@sanidiego.gov)

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Addendum 3



Existing Project Densities

The following slides depict development projects with their associated residential densities.

Density

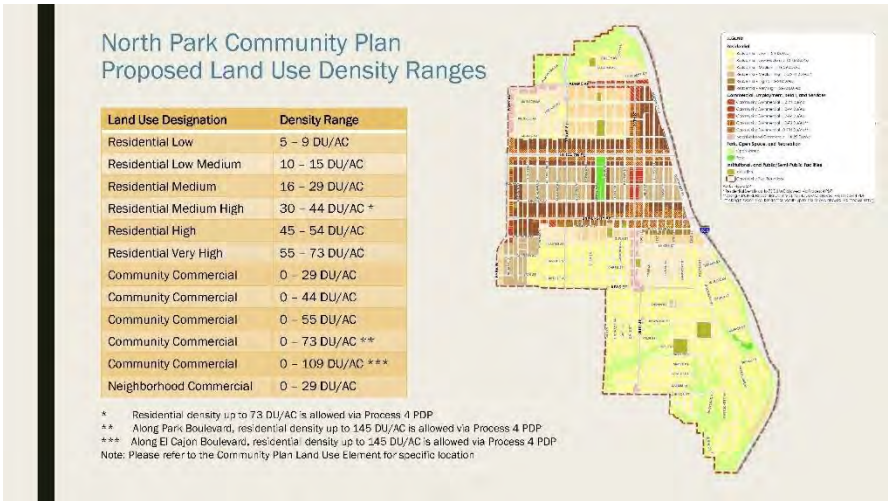
Residential density is dwelling units per acre. It is determined by dividing the number of dwelling units (DU's) by the total area of a project site in acres (AC):

$$\frac{\text{Number of Dwelling Units (DU's)}}{\text{Site Area (AC)}} = \text{DU/AC}$$

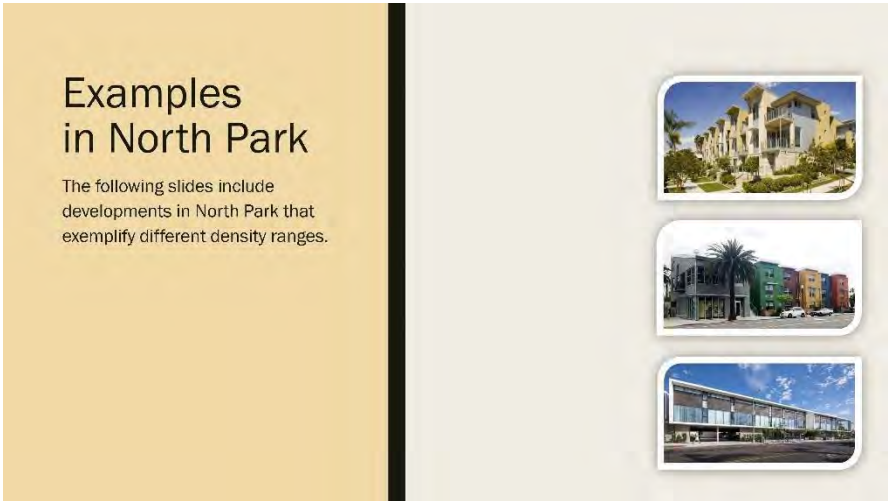
Building materials, Floor Area Ratio, and applicable building height, setbacks, design guidelines are other factors that will influence how a development project will look.

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Addendum 3 (cont.)



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Addendum 3 (cont.)



Photo courtesy of Allard Jansen Architects, Inc.

33 DU/AC

Hamilton Row
Hamilton St. and Lincoln Ave.

16 dwelling units
0.48 acres
3 stories



Photo courtesy of Vickie White

38 DU/AC

Streetcar Rowhomes
Adams Ave. and Idaho St.

12 dwelling units
0.32 acres
2-3 stories

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Addendum 3 (cont.)



Photo credit: © Matthew Segal

39 DU/AC

The North Parker
30th Street and Upas St.

27 dwelling units
0.68 acres
3 stories




Photo courtesy of: Lara Gates


68 DU/AC

Arbor Terrace
3701 Florida St.

82 dwelling units
1.21 acres
2-3 stories

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Addendum 3 (cont.)




83 DU/AC

Kalos
3795 Florida Street

83 dwelling units
1 acre
3 stories

Photo courtesy of Mark Davidson Photography, CHW



110 DU/AC

La Boheme
30th Street

224 dwelling units
2.04 acres
3-5 stories


Photo courtesy of Lara Gates

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Addendum 3 (cont.)

Examples in Other Communities

The following slides include developments in other communities in San Diego that exemplify different density ranges.



28 DU/AC




Kensington Park Plaza
Adams Ave. & Marlborough Dr.

11 dwelling units
0.40 acres
2 stories

Photo courtesy of: Friends of San Diego Architecture

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Addendum 3 (cont.)




47 DU/AC

One Mission
845 Fort Stockton

65 dwelling units
1.38 acres
5 stories

Photo courtesy of: Coldwell Banker Residential Brokerage



49 DU/AC

Wellington Square
4045 First Avenue

30 dwelling units
0.61 acres
4 stories

Photo courtesy of: Mayfair Communities

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Addendum 3 (cont.)



49 DU/AC

Cambridge Square
4th Ave. and Nutmeg St.

34 dwelling units
0.69 acres
4 stories

Photo courtesy of M.W. Steele Group



55 DU/AC


Centre Street Lofts
Centre St. between
University and Robertson

55 dwelling units
0.40 acres
3 stories

Photo courtesy of San Diego Architectural Foundation

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Addendum 3 (cont.)




58 DU/AC

Paseo at COMM 22
2325 Commercial Street

272 dwelling units
4.65 acres
4 stories

Photo courtesy of: Bridge Housing



60 DU/AC

Merrill Gardens
2nd Ave. and Maple St.

84 dwelling units
1.38 acres
5 stories

Photo courtesy of: Merrill Gardens at Bankers Hill

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Addendum 3 (cont.)




Photo courtesy of League of California Cities

60 DU/AC

Metro Villas
39th St. and University Ave.

120 dwelling units
2 acres
4 stories




Photo courtesy of Atlas on 5th

90 DU/AC

Atlas on 5th
5th Ave. and Pennsylvania Ave.

140 dwelling units
1.55 acres
5-6 stories

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Addendum 3 (cont.)



91 DU/AC

Doma
Kettner Blvd. & Date St.

124 dwelling units
1.35 acres
9 stories

Photo courtesy of: Doma Condos



99 DU/AC

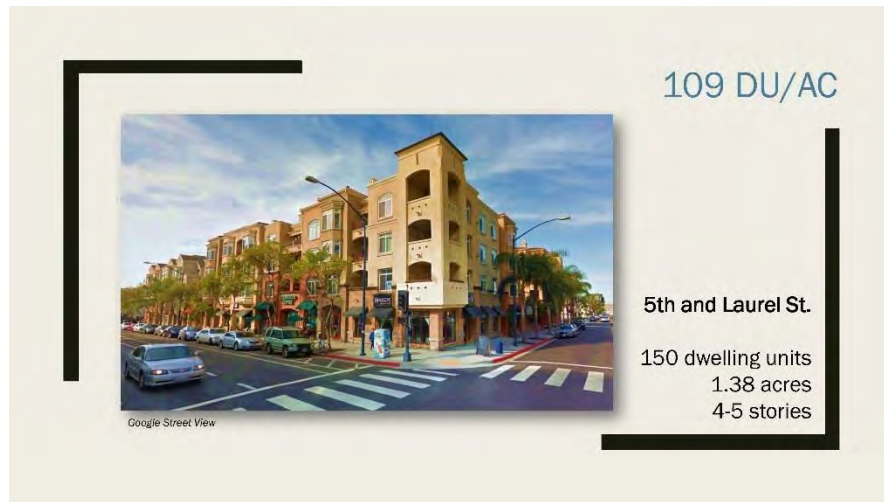
Kensington Commons
Adams Ave. & Marlborough Dr.

34 dwelling units
0.344 acres
3 stories

Photo courtesy of: Kensington Commons

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Addendum 3 (cont.)



Density over 145 DU/AC

The following slides include developments that exemplify densities from 145 DU/AC up to 200 DU/AC.

These density ranges would only be available to applicants that apply for the Discretionary Planned Development Permit as well as the Affordable Housing Density Bonus.



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Addendum 3 (cont.)

152 DU/AC




Broadstone
Kettner Blvd. and Fir St.

199 dwelling units
1.31 acres
6-7 stories

Photo courtesy of: Loopnet

166 DU/AC



Market Street Village
Market St and 14th Ave.

229 dwelling units
1.38 acres
5 stories

Photo courtesy of: Market Street Village Apartments

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Addendum 3 (cont.)



200 DU/AC

Aloft on Cortez Hill
Date St. and 9th Ave.

168 dwelling units
0.84 acres
5 stories

Photo courtesy of Greater Realty

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Addendum 4



On January 24, 2018 the Pacific Beach Planning Group voted unanimously, 17-0-0, to the following response to the Balboa Avenue Station area specific Plan, Draft December 1, 2017:

- 1) **Land Use:**
 - a) The PBPG supports the draft plan policies for housing type and density. Adequate Infrastructure, including mobility improvements, must be assured before increased housing density is permitted.
 - b) The draft plan must emphasize creating employment opportunities/growth within the project area in the form of office space and live/work space.
 - c) New development on Rose Creek must celebrate the creek not turn its back on the Creek. Do not allow walling off of the Creek Frontage like the recent construction of a storage building behind Sonic Drive-in.
 - d) Rose Creek must be dedicated as parkland and be funded by the City of San Diego for park services
 - e) Allow building height higher 30ft if it does not impact views.
- 2) **Mobility**
 - a) Prioritize an expedited timeline for funding improvements on Garnet Ave. and the Pedestrian/Bicycle Connection over or under 1-5.
 - i) Garnet Ave Mobility improvements should be a first priority and should not be saddled on developer/renter/buyer.
 - ii) The pedestrian/bicycle bridge/tunnel/ must be moved to phase one and the preferred connecting location is Magnolia Street instead of Bunker Hill.
 - b) Garnet Ave Class III bike lanes (Shared) are dangerous and not acceptable. Provide a safe bicycle route from the Balboa Station to bike routes West of Rose Creek and North of Garnet, See image below
 - c) Reduce Motor vehicle pressure from the project area caused the La Jolla/Pacific Beach out-through. Create a La Jolla freeway interchange or other strategies to move La Jolla commuters and transportation out of Pacific Beach.
- 3) **Pacific Beach EcoDistrict Compatibility:** Require all development and/or redevelopment to be compatible with the EcoDistrict Principles and adhere to the most current Project Design Checklist from the PBPG website.



Respectfully,

A handwritten signature in black ink, appearing to read "Henish Pulickal".

Henish Pulickal,
Chairperson, Pacific Beach Planning Group

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COMMENTS

RESPONSES

TO: PlanningCEQA@sandiego.gov

June 11, 2018

Comments on the

Draft Program Environmental Impact Report

SCH No. 2017071007 - Project No. 586601

Submitted by: Carolyn Chase, San Diego CA
Carolyn@iccontactweb.com

AH-1

Thank you for the opportunity to comment. I live in one of the neighborhoods west/northwest of the Plan and have looked forward for many years for the trolley to come near us. It is imperative that the City rise to the challenge of adding growth in this current car and traffic dominated area. Unfortunately, the PEIR shows they are adding growth without sufficient infrastructure or mitigation. The Plan as presented and evaluated does not rise to greatness.

AH-2

1. 60 days to review more than 2,000 pages? This is disingenuous and expensive and demonstrates a lack of commitment to public or expert input. Is this now the maximum legal limit for CEQA comments or could the City extend the comment period further? If the City can extend the comment period, please address the issues below and recirculate it for additional comments.

AH-1 The comment includes introductory statements and makes a general statement about the Balboa Avenue Station Specific Plan (BASASP) and that the Program Environmental Impact Report (PEIR) shows that infrastructure and mitigation are not sufficient to support the growth associated with the BASASP. The PEIR was prepared in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000 et seq.). The conclusions and supporting analysis contained in the PEIR are supported by substantial evidence contained in the record. Impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, the PEIR identifies mitigation measures that would avoid or reduce impacts and discloses where impacts cannot be mitigated to less than significant.

AH-2 The public review process of the Draft PEIR was conducted in accordance with the requirements of CEQA, pursuant to CEQA Guidelines Sections 15087 and 15105. The City also extended the required 45-day public review period an additional 14 days in response to a request made by the Clairemont Mesa Community Planning Group to allow for additional time to review the Draft PEIR and provide comments.

COMMENTS

RESPONSES

AH-3 2. How did planners decide how many dwelling units/acre should go in the Community Village Zones? What references were used to determine how many dwelling units should be in the Community Village zones?

AH-4 3. What in the City's estimation would be too many dwelling units to add? How much population would be too much for the existing infrastructure? How is that estimated by planners?

AH-5 4. As part of the new Village, to support the goals of walkability to and from the transit station, all missing sidewalks should be completed Reference Exhibit PB-1: Mission Sidewalks and Curb Ramps from the Pacific Beach Pedestrian Plan by the City of San Diego. How would this be funded and prioritized in the Plan Area?

AH-6 Is the City planning that missing sidewalks be completed along private or other agency property frontages only as those properties are re-developed? Or will they be considered public works for the City and how is this decided?

AH-7 5. Did the City consider the recommendations in the Pacific Beach Pedestrian Plan that pertains to the Plan Area? If so, what we're adopted? What was dismissed, and why?

AH-8 6. What is the plan doing to address the community park deficit?

AH-9 7. Why doesn't the Plan propose the dedication of Rose Creek and the pathways beside it as dedicated parkland?

AH-3 Please see the Balboa Avenue Station Area Specific Plan Proposed Build Out Assumptions memo regarding build out assumptions used in the Draft PEIR.

AH-4 Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to residential densities and proposed mobility improvements in the BASASP area.

AH-5 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances. Information related to financing mechanisms is discussed in the Infrastructure Financing Study topic of the BASASP Public Comment Summary document.

AH-6 Information related to financing mechanisms is discussed in the Infrastructure Financing Study topic of the BASASP Public Comment Summary document.

AH-7 The BASASP considered improvement areas PB-2, PB-5, PB-10 and PB-12 from the Pacific Beach Pedestrian Plan that are within the boundaries of BASASP. Bond Street itself was maintained similar to the existing conditions for pedestrian network, but the intersection with Garnet Avenue has recommended pedestrian enhancements consistent with PB-2. Rose Creek trail connection enhancements at Grand Avenue, Garnet Avenue, and Damon Avenue were identified in the BASASP, consistent with PB-5. Pedestrian crossings and larger pedestrian storage areas are included in the BASASP network at Mission Bay Drive and Grand Avenue, consistent with PB-10. The BASASP is a connectivity study to the Mid-Coast Corridor Transit Project's Balboa Avenue Trolley Station, consistent with PB-12.

COMMENTS

RESPONSES

AH-9
(cont.)

It should be required under this plan that while adding thousands of people that some new parkland must be dedicated. There are already currently significant trash and usage issues around the Creek. The adopted Rose Creek Watershed Land Use Plan should also be applied.

Please see the letter from Friends of Rose Creek dated January 23, 2018 and submitted as comments on the Plan and also comments being submitted on this EIR. These letters list the Rose Creek Parcels needing dedication as well as paper streets that need to be vacated.

Note this action is consistent with:

LU-F.1 Apply existing or new Land Development Code zone packages or other regulations as needed to better implement the policy recommendations of the General Plan; land use designations of the community plans; other goals and policies of the community plans; and community-specific policies and recommendations;

and with:

LU-F. Create and apply incentive zoning measures to achieve the desired mix of land uses and public benefits.

a. Continue to provide incentives to development proposals that contribute to the provision of affordable housing, environmental enhancement, urban design, and energy conservation, as well as those that provide public facilities and amenities over and above regulatory requirements.

b. Ensure that the granting of development incentives does not result in an adverse impact upon health, welfare, and safety of the surrounding community or upon any designated cultural and/or historic resource.

Any and all existing paper streets in or along the creek should be vacated and changed to dedicated parkland.

AH-10

The City cannot have it both ways. There are 212 references to Rose Creek in the PEIR, yet the Plan Boundaries do not include the Creek. This is a significant flaw in the PEIR. Rose Creek must be included and the document updated and recirculated to include disclosure of impacts to the Creek and mitigation for the impacts.

AH-8 The BASASP includes policies to provide community park facilities that meet the need of the future residential population and encourages new development to incorporate park amenities within their building footprint or on site.

AH-9 The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

AH-10 Please see Response AG-18.

COMMENTS

RESPONSES

AH-11	<p>This mention included from the PT Community Plan does not appear to be adequately reflected in the BASASP: Ref 5- 1-21 Parks and Open Space Element</p> <p>This element of the Pacific Beach Community Plan recognizes the Rose Creek area as an open space feature in the Pacific Beach community. A specific proposal to designate the Rose Creek inlet and flood control channel as open space, and further develop the area adjacent to the floodway as a linear parkway with native riparian landscaping, as when pedestrian and bicycle paths, is noted in the plan.</p>	<p>AH-11 As discussed in Section 5.1.4.1 of the PEIR, the recreation chapter of the proposed BASASP incorporates the concept of a linear park for the Rose Creek open space (within specific policies of the that chapter) as envisioned in the Parks and Open Space Element of the Pacific Beach Community Plan.</p>
AH-12	<p>8. How can what are "required mitigations" be then ignored in the Plan? How can they be said to be required? Are they counted or modeled in any way in the PEIR analysis? If so, how?</p>	<p>AH-12 The PEIR discloses where impacts cannot be mitigated to less than significant. In those cases, impacts are considered significant and unavoidable because mitigation measures do not exist or are considered not feasible to reduce impacts to less than significant. The City prepared a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093, which must be prepared when significant and unavoidable impacts remain after changes or alterations are applied to a project. The Statement of Overriding Considerations provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental impacts.</p>
AH-13	<p>9. The City appears unwilling to consider that property owners will attain benefits from the increased density and for providing the additional property/easements into the public Right-of-way to allow for the population increase to actually function better.</p> <p>Please allow for the taking of property or easements required to achieve plan goals for pedestrian safety, reduced pollution etc.</p>	<p>AH-13 Although improvements are identified in the PEIR that would reduce traffic impacts, one of the reasons the City determined they would not be feasible to implement is because several of the improvements would require substantial right-of-way acquisition and removal of existing structures, which could result in additional air quality, greenhouse gas emissions, noise, and solid waste environmental effects, as well as increased pedestrian diversion at the intersection of Balboa Avenue and Clairemont Drive.</p>
AH-14	<p>You can't achieve smart growth or any of the niceties that the City claims can go along with extreme densification without providing the required sidewalks, setbacks and parks.</p>	<p>AH-14 See Response AH-5 regarding sidewalks and AH-8 regarding parks. Setback requirements would be established by the development standards of the proposed zone classification.</p>
AH-15	<p>10. I refer specifically to the Page 8-15 Transportation Appendices list of MITIGATION MEASURES Out of an identified 15 possible mitigation measures, only 3 are recommended. Overall the theme is "improvement is not</p>	

AH-15
(cont.)

recommended.” Are these “not recommended measures” consistent with other policy in the PEIR? Please say which ones are and which ones aren’t

- In the long term, obtain the dedication of the required right-of-way on both sides of Garnet Avenue to increase to six lanes between Soledad Mountain Road and Interstate 5, and to provide bike lanes, a landscaped entryway and landscaping as identified in Appendix D. Mitigation measures shall be provided during construction to address the impacts of increased sediment caused by grading. Measures should include catch basins and filtering systems or other necessary and effective measures. The bridge design should provide for minimal alterations to Rose Creek and its habitat.
- At the intersection of Garnet Avenue and Mission Bay Drive, add a second southbound to eastbound left turn lane and lengthen the storage length for the northbound right and left turn lanes.

AH-16

11. With respect to this potential mitigation measure:

Garnet Avenue between I-5 SB On Ramp and I-5 NB Off Ramp: Widen this segment of Garnet Avenue to an 8-lane Major Arterial. With the implementation of this partial mitigation, **the roadway segment will still operate at unacceptable conditions** and the significant traffic associated with the Future Adopted Land Use scenario would remain significant. This improvement would require reconstruction of the freeway undercrossing. It would also impact properties on either side of the freeway undercrossing to create transitions or widen the roadway on either side to match this width. Due to these factors, this **improvement is not recommended** as part of the Balboa Avenue Specific Plan.

++ Doesn’t widening Balboa here to allow for safe pedestrian passage recommend and require reconstruction of this freeway under crossing? And in any case, isn’t breaking up the segments for potential widening, and then using as a reason not to widen that other segments aren’t widening, a self-fulfilling approach, i.e. the City should consider the widenings all together or at least all together east and west of E. Mission Bay Drive.

AH-15 Section 5.15.6 of the PEIR is consistent with the Traffic Impact Study (TIS) prepared for the proposed project and included as Appendix K of the PEIR. The referenced page 8-15 of the TIS addresses the Adopted Community Plan Scenario; identified mitigation measures for the proposed BASASP are listed starting on page 8-39 of the TIS. Section 5.15.6.2 of the PEIR identifies which specific improvements are proposed as part of the BASASP and include improvements at four intersections (Garnet Avenue/Olney Street [TRANS 5.15-5], Garnet Avenue/Mission Bay Drive [TRANS 5.15-6], Balboa Avenue/Morena Boulevard [TRANS 5.15-7], and Morena Boulevard/Jutland Drive [TRANS 5.15-9]).

AH-16 Implementation of this improvement was determined not to be feasible because of the right-of-way constraints as stated in Response AH-13. The BASASP identifies pedestrian improvements to provide improved and safe mobility for pedestrians within the BASASP area, including non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.

COMMENTS

RESPONSES

AH-16
(cont.)

Widenings in these areas need not just be for increased car lanes, but for wider pedestrian walkways and setbacks from the planned massive traffic congestion. The goal should be to create “Great Streets” where people have some separation from the realities of large traffic movements forecast to continue.

AH-17

12. With respect to this mitigation measure:
Mission Bay Drive between Damon Avenue and Garnet Avenue: Widen this segment of Mission Bay Drive to a 6-lane Major Arterial. The significant traffic impact associated with the Future Adopted Land Use scenario to this roadway segment would be fully mitigated with the implementation of this measure; however, this would require right-of-way acquisition and significantly impact the properties on each side of this roadway segment. **Due to the impact to adjacent properties, this improvement is not recommended** as part of the Balboa Avenue Specific Plan.
++ Did the City consider that this would increase the chances of improving the valuations of these properties? The situation on the ground now is highly pedestrian-unfriendly; Widening there might decrease somewhat the amount time that cars are waiting at signals and blocking access. The parcels there are deep enough to gain additional value from the rezone at the same time allowing for increase public capacity in the ROW there. This also applies to other decisions being made about the benefits of increasing public ROWs to mitigate the increased impacts of growth. Widenings in these areas need not just be for increased car lanes, but for wider pedestrian walkways and setbacks from the planned massive traffic congestion.

AH-17 Please see Response AH-16.

COMMENTS

RESPONSES

AH-18

13. No mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City.

++ The Mayor has a major role and influence at SANDAG. Surely the City should identify and recommend improvements for the Mayor to pursue. Without an improvement in the speed and connectedness of the transit system, the Villages will be swamped in traffic because significant numbers of travelers simply cannot use the transit system to get to work or even to a grocery store. The transit system has also gotten expensive to ride. The City and the Mayor have major leadership roles in attaining the goals of all the City Village Plans and especially this one.

AH-19

14. "ES-1: The proposed BASASP would allow up to 4,729 residential units, including 895 multi-family and two single-family dwelling units within the residentially-designated areas and up to 3,832 multi-family residential units within the Community Village designation. In addition, up to 669,800 square feet (SF) of commercial retail uses and 423,500 SF of industrial uses could be developed within the BASASP area. An active commercial frontage is proposed along the main roadways in the BASASP area. Much of the BASASP area would be designated for Community Village, while the balance of the land area would be for residential and light industrial use. Open space is provided within Rose Creek."

++ This is existing open space. What open space additions, enhancements and improvements are to be provided to allow for the additional population to have open space above and beyond the situation now?

What designation allow for the ongoing maintenance, trash and recycling containers and pick etc.

Additional population only adds to the stresses in an area without sufficient "open space" or community parks now.

AH-18 Please see Response AE-16.

AH-19 Please see Response AH-8 regarding parks. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's MSCP Land Use Adjacency Guidelines for protected open space lands would apply to the area.

AH-19
(cont.)

NOT ONLY THAT: ON THE VERY NEXT PAGE it has long list of platitudes including:

- Expand access to park and recreation facilities within and adjacent to the BASASP area, including trail options and joint use opportunities, to promote a healthy, active community;
- Incorporate sustainability practices, policies, and design features into projects within the BASASP area that reduce greenhouse gas (GHG) emissions; and

++ and a few others, if actually applied, would REQUIRE increased protections for Rose Creek properties and plans to increase them in order , among other things, to also apply this:

- Increase mobility for pedestrians, cyclists, transit users, and automobiles through improved linkages at key points, with a strong pedestrian focus;
- Identify key mobility improvements to facilitate connections within and through the BASASP area, as well as to surrounding areas.

AH-20

15.

To reduce the number of residential units, the Medium Density Alternative would eliminate the emphasis placed on increasing residential densities,

++ This statement is incorrect. The Medium Density alternative still emphasizes increasing density, just to a slightly lesser degree.

Ref: compared to 4,729 dwelling units for the proposed BASASP.

ES.6.2 Medium Density Alternative amounts to only 562 units fewer than the proposed or an additional 4,176 zoned units

Each is over a total of 1,221 dwelling units would be expected at buildout under the adopted Pacific Beach Community Plan which comes out to merely 12% less of an increase in zoned density.

AH-20 The referenced sentence is included in the Executive Summary (Section ES.6.2) of the PEIR and is a concise synopsis of the more detailed description of the Medium Density Alternative contained in Section 10.2.1 of the PEIR. This sentence in the Executive Summary has been revised to clarify the areas within the BASASP boundaries where residential densities would be reduced compared to the proposed BASASP, similar to the description in Section 10.2.1.

COMMENTS

RESPONSES

AH-21	<p>The City did not analyze any alternative that was truly Medium Density. By looking at Alternatives that only increases density by between 3.4x - 3.9x existing units is not considering a sufficient range of alternatives.</p> <p>The City did not provide, nor analyze a reasonable range of alternative. They should add and analyze a Small Density Alternative, something in the range of adding 2000-2500 over existing DU.</p>	<p>AH-21 In addition to the No Project Alternative: Adopted Community Plan and Medium Density Alternative that were evaluated in the PEIR, Section 10.4 in the PEIR identifies two other alternatives that were initially considered to reduce environmental impacts, including a Mobility Improvements Alternative and a Low Density Alternative. Descriptions of these alternatives and the reasons why they were not carried forward for further consideration is contained in Section 10.4.</p>
AH-22	<p>16. The Environmentally Sensitive Alternative should include only a zone that increases density inside the Prop D Coastal Height Overlay Zone.</p>	<p>AH-22 The PEIR does not include an "Environmentally Sensitive Alternative." As indicated in Response AH-21 above, alternatives that were evaluated in the PEIR include the No Project Alternative: Adopted Community Plan and Medium Density Alternative, as well as two additional alternatives that were initially considered but not evaluated in further detail (Mobility Improvements Alternative and a Low Density Alternative). Regardless and as noted in Section 5.1, <i>Land Use</i>, of PEIR, the southwestern portion of the BASASP area (south of Garnet Avenue and west of Interstate 5) is located in the Coastal Zone (refer to Figure 5.3-2 in the PEIR), and the western portion of the BASASP area (west of Interstate 5) is located within the Coastal Height Limit Overlay Zone. All of the areas proposed to be re-designated as Community Village would be located within this portion of the BASASP area that is within the Coastal Height Limit Overlay Zone, which is subject to a 30-foot height limit.</p>
AH-23	<p>17. Tab ES-1 (cont) Executive Summary states: Roadway Section Three consecutive segments of Garnet Avenue from Mission Bay Drive to Morena Boulevard SB RampsCumulatively significant and unavoidable¹ Mitigation Measure TRANS 5.15-1, as identified in Section 5.15. AND later down in the same chart under Intersections is also listed: Garnet Avenue at Mission Bay Drive Less than significant (Mitigation Measure TRANS 5.15-6,...) ++ Is it such that this intersection at the heart of current traffic congestion - with significant additional trips being added, wouldn't have a significant impact ??? This doesn't make sense UNLESS the definition of the intersection is set so as to expressly limit the excess capacity due to its signalization? Doesn't the back up of traffic into the adjoining several intersections sufficient to realize significant impact in this intersection?? With the current LOS during peak periods already backing up traffic - any additional trip additions will be significant.</p>	<p>AH-23 Section 5.15.6.1 of the PEIR identifies a significant impact at the intersection of Garnet Avenue and Mission Bay Drive during the PM peak period (Impact 5.15-6). Mitigation is identified in Section 5.15.6.2 of the PEIR (TRANS 5.15-6) that would reduce this impact to a less-than-significant level. The analysis of intersections was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual.</p>

COMMENTS

RESPONSES

- AH-23 (cont.) Furthermore, during most times of the day currently, cars are running the red lights especially from E. Mission Bay Drive turning west on the Balboa/Garnet and from Balboa/Garnet turning north on to E. Mission Bay Drive and blocking traffic in the green directions. What mitigations can the City provide to reduce intersection impacts? Did the City take into account the existing intersection blockages when determining significance for the intersections that were analyzed?
- AH-24 18.
The BASASP proposes two new land use designations: Residential (15 to 54 dwelling units per acre [du/ac]) and Community Village (0 to 73 du/ac and 0 to 109 du/ac), and two consistent with the adopted Pacific Beach Community Plan: Light Industrial, and Flood Control/Open Space.
++ Please provide an illustration of what the minimum practical building envelope would be for 73 du/acre and for 109 du/acre and what is the smallest lot size these zones could be applied to? Would a half-acre lot be entitled to half of the du/acre for instance?
- AH-25 ++ is there any building envelope that applies those zones that would exceed the 30 ft height limit that applies to the areas west of I-5
- AH-26 19.
REF: Division 5: Coastal Height Limit Overlay Zone
<http://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art02Division05.pdf>
++ Wouldn't the proposed zones allow for buildings that could exceed the 30 ft height limit?

- AH-24 The project proposes to re-designate some areas within the BASASP area to Residential and Community Village. This re-designation would allow for future redevelopment with transit-orientated development pursuant to the proposed land use designation and zone classification. Building envelopes, lot sizes, and other development parameters for properties would be stipulated by the development standards of the proposed zone classification.
- AH-25 Future development pursuant to the BASASP within the Coastal Zone and/or Coastal Height Limit Overlay Zone (west of Interstate 5) would be subject to a height limit of 30 feet.
- AH-26 As noted in Section 5.1, *Land Use*, of PEIR, the southwestern portion of the BASASP area (south of Garnet Avenue and west of Interstate 5) is located in the Coastal Zone (refer to Figure 5.3-2 in the PEIR), and the western portion of the BASASP area (west of Interstate 5) is located within the Coastal Height Limit Overlay Zone. All of the areas proposed to be re-designated as Residential and Community Village would be located within this portion of the BASASP area that is within the Coastal Height Limit Overlay Zone, which is subject to a 30-foot height limit.

COMMENTS

RESPONSES

AH-27	<p>20. a total of 1,221 dwelling units would be expected at buildout under the adopted Pacific Beach Community Plan, compared to 4,729 dwelling units for the proposed BASASP.</p> <p>ES.6.2 Medium Density Alternative AMOUNTS TO 562 units fewer than the proposed or an additional 4,176 zoned units</p> <p>++ What are any professional planning definitions for "Medium Density" or "High Density" or any applicable General Plan definitions?</p> <p>Community Village (0-73 du/ac) land use designation across the area situated between Bunker Hill Street and Rosewood Street, as compared to the Community Village (0-109 du/ac) designation proposed by the BASASP, and maintaining the current adopted community plan density range (15-29 du/ac) for the land designated Residential bounded by Rose Creek on the west, Figueroa Boulevard on the east north, and Grand Avenue on the south.</p>	<p>AH-27 There are no industry-standard definitions that quantitatively delineate medium versus high density. These terms are used qualitatively in the PEIR to differentiate and provide a relative naming convention for the project alternatives. It is acknowledged that the Medium Density would provide 562 fewer residential units than the proposed BASASP and that both would result in increased densities compared to the adopted Pacific Beach Community Plan.</p>
AH-28	<p>21. ++ if the density bonus is being applied to these zones, what do to the max building envelopes then look like? i.e. what height would be required to build out the max units assuming an average unit size of 750 sq ft? 500 sq ft?</p> <p>++ Is this 43 du/acre figure above and beyond the basic zone?</p>	<p>AH-28 As stated in Response AH-24, building envelopes, height limits, and other development parameters would be stipulated by the development standards of the proposed zone classification. These would also apply to future development within the BASASP area that propose density bonuses.</p>
AH-29	<p>22. How does the shared parking work? ++ what are the parking requirements in the Plan? Is it just what the developer decides?</p>	<p>AH-29 The BASASP includes policies that encourage shared parking. Potential shared parking opportunities would be considered on a project-specific basis and would be established at the project level. Future development proposals within the BASASP area would be required to provide adequate on-site parking in accordance with the City's parking standards.</p>

COMMENTS

RESPONSES

AH-30

23. **Transit Area Overlay Zone** Areas in close proximity to transit stops have reduced parking demand,
 [SEP] ++ what data show this in San Diego? What data doesn't show this? [SEP]

AH-31

24. The use and development regulations of the LDC would apply to property within the BASASP area, except where supplemental development regulations are proposed for lands designated Community Village (Figure 3-1) which would allow for:
☐ Removal of the ground-floor minimum height requirement for properties in the Community Village designation in the Community Commercial (CC-3-8 and CC-3-9) zone;
☐ Removal of restrictions on residential use on the ground floor of residential development in the Community Village designation in the Community Commercial zones of the Coastal Overlay Zone where active commercial frontages are not required; and

BALBOA AVENUE STATION AREA SPECIFIC PLAN PEIR 5.1-31 APRIL 2018 *Section 5.1 Land*

Use ☐ Requirement for non-contiguous sidewalks and street trees where development is proposed in the Community Village designation.

++ This is confusing: Does this mean that the area is being exempted from non-contiguous sidewalks or are they being required? Please require them as consistent with the multitude of policies supporting the need for safe pedestrian access from the transit station to surrounding neighborhoods. Please confirm that sidewalks are planned to be completed all the way north of Balboa /Garnet on E. Mission Bay Drive up to the signal at Bluffside.

AH-32

25. **General Development Regulations** Future development implemented under the proposed BASASP would be required to comply with (or request deviations from) applicable development regulations of the underlying zone classification, and review would occur on a project-by-project basis, thereby ensuring consistency with general development regulations. ++ LOL!!!! So the ability to request deviations on a project-by-project basis thereby ensures consistency with GDP? Uh no.

It may be allowed, but that's not about consistency with the GDP. Environmentally Sensitive Lands

AH-33

Regulations No direct encroachment into resources within Rose Creek that are protected by the ESL is anticipated. The only potential improvements identified under the proposed BASASP in the vicinity of

AH-30 The portion of the BASASP area along Balboa Avenue between Mission Bay Drive and Morena Boulevard is located within the Transit Area Overlay Zone. Pursuant to Section 132.1001 of the City's Municipal Code, the purpose of the Transit Area Overlay Zone is "to provide supplemental parking regulations for areas receiving a high level of transit service. The intent of this overlay zone is to identify areas with reduced parking demand and to lower off-street parking requirements accordingly." This overlay zone applies to the areas within the diagram on file, per Section 132.1002 of the City's Municipal Code.

AH-31 Non-contiguous sidewalks and street trees are required for specific development proposals within areas designated Community Village along active commercial frontages of Garnet Avenue and Mission Bay Drive (refer to Figure 3-1 in the PEIR). This has been clarified in the referenced text of the PEIR.

AH-32 Future development proposals would be required to comply with applicable development regulations of the proposed zone. As noted in Section 5.1.4.1 of the PEIR, each proposal would be reviewed for consistency with required development regulations. If deviations are proposed as part of the specific development proposals, those would be taken into consideration at the time of the project-level review. The noted sentence from the PEIR has been revised to remove the reference to deviations.

AH-33 Please see Response AH-9.

COMMENTS

RESPONSES

AH-33
(cont.)

the creek are signage, accessible paths, public art, sitting areas, outdoor dining areas, and/or public spaces that take advantage of its open space views. Future development along the Rose Creek corridor would be required to adhere to and be consistent with ESI Regulations. Thus, no impacts related to policy conflicts are identified.

++ Increasing the population significantly that would use the areas next the creek would increase trash and pollution in and around the creek. In order to mitigate the additional pressures, Rose Creeks and it's pathways must be dedicated as parkland and any and all existing paper streets must be vacated as a beginning to mitigate the additional population being added.

AH-34

26.

Relative to the adopted Pacific Beach Community Plan, the proposed project would:

- increase the number of residential units by 287 percent;
- increase the amount of land designated for retail/commercial by 25 percent; and

decrease the amount of land designated for industrial uses by 49 percent. Due to these land use changes, the proposed project is not consistent with the RAQS. Additionally, as discussed in the traffic impact study prepared for the proposed project, the proposed land use designations would be expected to generate more average daily trips (ADT) than the uses currently allowed under the adopted Pacific Beach Community Plan (55,625 ADT compared to 31,032 ADT) (Kimley-Horn 2017). Thus, neither the proposed land uses nor the estimated vehicle trips from the BASASP area were included in the emissions assumptions contained within the RAQS. The proposed project is therefore inconsistent with the RAQS, and could potentially impede the goals contained within the RAQS.

++ Will projects be required to be setback the Recommended Buffer Distance from I-5? Ref: Table . 5.2-8^{SEP}

AH-35

27. What is the current number of vehicles passing by the Plan Area on I-5S? And what are the current peak hours for traffic?

As stated in Section 5.2.7.1 of the PEIR, the siting distances recommended by the California Air Resources Board (CARB) that are identified in Table 5.2-8 of the PEIR are advisory and are not required buffer zones for new development. These will be considered as part of the project-specific approval process associated with future development proposals within the BASASP area.

Existing traffic volumes on Interstate 5 in the vicinity of the BASASP area are identified in Table 4-5 of the TIS, which is provided below. Morning peak hours are from 7:00 to 9:00 a.m., and afternoon peak hours are from 4:00 to 6:00 p.m.

Table 4-5 Existing Freeway Segment Analysis Results

Freeway Segment		Dir	Number of Lanes	Peak-Hour Volume (a)		Speed (mph)		Density (pc/mi/ln)		LOS (b)	
				AM	PM	AM	PM	AM	PM	AM	PM
I-5	SR-52 to Mission Bay Dr	NB	5	9,662	6,153	61.1	68.0	34.0	23.7	D	C
		SB	5	5,614	9,365	68.0	62.4	23.7	32.2	C	D
	Mission Bay Dr to Garnet Ave/ Balboa Ave	NB	4	7,066	4,500	64.3	68.0	29.6	23.7	D	C
		SB	4	4,106	6,849	68.0	65.2	23.7	28.3	C	D
	Garnet Ave/ Balboa Ave to Mission Bay Dr	NB	4	6,492	5,788	66.5	68.0	26.3	23.7	D	C
		SB	4	5,000	6,910	68.0	65.0	23.7	28.6	C	D
	Mission Bay Dr to Clairemont Dr	NB	5	8,164	7,279	66.4	68.0	26.5	23.7	D	C
		SB	5	6,288	8,691	68.0	64.8	23.7	28.9	C	D

Notes:

(a) Peak-hour volumes were estimated by applying the K and D factors to the published 2016 Caltrans AADT volumes.

(b) The LOS for the respective freeway segments were based on the methodologies contained in Chapter 11 of the 2010 Highway Capacity Manual

COMMENTS

RESPONSES

- AH-36 28. Overall, connections to high- or medium-quality pedestrian walkable facilities are rated as being zero percent available to the north and west of the station location, and only 6 percent available to the east and 30 percent available to the south. [SEP]
++ What will be those measures at Plan implementation? What walkable facilities (sidewalks) is the City guaranteeing will happen by the time the transit station opens?
- AH-37 29. Re Figure 5.15-13 and related policies and specifically the crosswalk placements and bike route
++ Are bikes expected to cross at the planned cross walk from the east side of E. Mission Bay Drive across Grand to the golf course fence? [SEP] and what bike lanes will be on the south side of Grand Ave along the golf course? [SEP]
- AH-38 [SEP]30. What improvements are being coordinated with the De Anza Plan Update to accommodate the increased pedestrian and bike traffic from the Village down East Mission Bay Drive into Mission Bay Park. Existing conditions are both dangerous and ugly. The creek/drainage ditch is not being maintained properly. Improvements to this area are essential for adding a Village just north of here. [SEP]
- AH-39 31. One of the primary principles of smart growth is to encourage the use of alternative forms of transportation by discouraging reliance on the private automobile. As the improvements identified above would reduce traffic congestion and encourage automobile use, these mitigation measures can generally be considered inconsistent with the overall goals of the City's General Plan and BASASP. Additionally, roadway and intersection widening could impact existing or proposed pedestrian (such as at Clairemont Drive and Balboa Avenue intersection) or bicycle facilities, which could discourage walking and bicycling. As such, mitigation measures evaluated for Garnet Avenue, Balboa Avenue,

- AH-36 Upon completion of the BASASP, all identified improvements will be added to the Transportation Needs List to compete for funding.
- AH-37 Bicycles would be able to cross at the signalized intersection of Grand Avenue and Rosewood Street or the signalized intersection of Grand Avenue and E. Mission Bay Drive. Bike lanes are provided on the south side of Grand Avenue. A shared-use path is included starting at Rosewood Street and heading south to access Mission Bay Park.
- AH-38 Bike lanes and shared use paths are provided on the west side of E. Mission Bay Drive to Grand Ave and on the east side to Rosewood Street. Pedestrians and bicycles would be able to cross at the signalized intersection of Grand Avenue and E. Mission Bay Drive or E. Mission Bay Drive and Rosewood Street. Bike lanes are provided on the south side of Grand Avenue. A shared-use path is included starting at Rosewood Street and heading south to access Mission Bay Park.
- AH-39 The PEIR discloses where impacts cannot be mitigated to less than significant. In those cases, impacts are considered significant and unavoidable because mitigation measures do not exist or are considered not feasible to reduce impacts to less than significant. With regard to traffic, although improvements are identified in the PEIR that would reduce impacts, the City is unable to rely on these measures because (1) surrounding existing development restricts the ability to obtain sufficient right-of-way to construct some of the identified improvements and (2) the City believes that their implementation would be contrary to achieving the smart growth goals of the General Plan and BASASP.

The Commercial and Industrial zones allow for parking facilities as a primary use.

AH-39
(cont.)

Mission Bay Drive, and Clairemont Drive segments are considered infeasible due to policy considerations. += except that the NOP notice states, among other things: "The Specific Plan promotes increasing transportation choices, decreasing dependence on the single occupancy vehicles, and reducing traffic congestion at local intersections and roadways." This PEIR consistently makes choices that increase traffic congestion and local intersections and roadways while declining to "reduce traffic congestion at local intersections and roadways" even though this document lists mitigations that could be feasible

— What zones in the Plan allow for parking-only structures?

AH-40

32. Growth Inducement – Insufficient Mitigation and lack of analysis of Impacts

According to city staff: The Specific Plan would allow for approximately 4,729 units. The projected population ... would be approximately 8,800.

***New city.** That's about 2/3 the population of Solana Beach. It's like a new city within the City of SD.

***School space.** How many new students would that result in? 2000?

AH-41

***Parks.** At a Gen Plan standard of 2.8 acres per 1000 people, that would mean 25 more acres of community and neighborhood parks. We know that the city's intention is to avoid requirements for new parks. Instead they will use "equivalencies" and thus count Mission Bay Park, Tecolote Canyon and Rose Canyon as parkland for the new project.

Considering just the pets: If half the units have dogs, that's 2360 dogs each day needing Relief Stations and space to walk and run. Is there a plan for several on-leash and off-leash dog areas? Should each building be required to include a Relief Station, like those at airports?

***Recreation Center.** The General Plan guideline is: One 17,000 sf recreation center per 25,000 population. So enough DIF money needs to be collected to fund about one-third the costs of a Rec Center, including land.

AH-40 Section 5.13.4.1 of the PEIR includes an analysis of school facilities. While the number of new students cannot be known at this time, the PEIR acknowledges that the increase in population associated with future development pursuant to the proposed project would generate additional students. Future development proposals are required to pay applicable school impact fees per Government Code Section 65995 and Education Code Section 53080. Payment of these fees would fully mitigate impacts on school facilities.

AH-41 Please see Response AH-8.

COMMENTS

RESPONSES

AH-41
(cont.)

***Aquatic Center.** The General Plan guideline is: One Aquatic Complex per 50,000 population. So enough money needs to be collected to fund about one-sixth the cost of an Aquatic Complex, including land.

Some of the need for parks, recreation and aquatic facilities could be met by requiring on-site park space and indoor facilities. Are there policies to require that?

AH-42

***Traffic.** If small units near transit generate 5 ADT per unit, then 4729 units would generate 23,600 units. Add more for commercial trips. What does the EIR show as the total? In addition to the trolley station, is there a plan to improve the street system, sufficient to handle that large increase in vehicle traffic? What's the current utilization of I-5 in that area? At capacity, it would seem.

AH-43

Conclusion: The goal of "smart growth" is to channel new development into areas which are well-served by public facilities, or where the needed public facilities can be provided concurrent with need. Does this project meet that goal? Or will it result in sub-standard facilities for new residents, and degraded quality of life for current residents?

AH-44

33. THE EIR STATES: Should a project within the BASASP area require a discretionary action, Senate Bill 743 (SB 743) provides an exemption from environmental review under CEQA for development that is consistent with a specific plan and eliminates or reduces the need to evaluate aesthetic and parking impacts as part of the environmental review (see PRC Section 21155.4). Future projects that are consistent with the BASASP may be able to rely on this exemption if a development meets all of the following criteria:

- The project is a residential, employment center, or mixed-use project;

AH-42 Section 5.15.6.1 discloses the additional traffic trips generated by full implementation of the proposed BASASP. A total of 55,625 daily traffic trips would be generated, which include 28,380 trips associated with residential uses and 27,245 trips associated with non-residential uses.

The BASASP recommends improvements that balance the needs of all users, decrease dependence on single occupancy vehicles, and reduce average commute distances. Mission Bay Drive at Grand Avenue would be changed to realign the travel lanes so that Grand Avenue becomes the through movement rather than Mission Bay Drive. This would reduce delays at the intersection and provide a pedestrian crossing to enhance access to Mission Bay Park. Improvements to the Garnet Avenue and Mission Bay Drive intersection including the addition of a second left turn lane for westbound traffic to increase the capacity for vehicles traveling to Pacific Beach. Garnet Avenue west of Mission Bay Drive would be widened from four lanes to six lanes to enhance vehicle capacity in the area and facilitate the bus connection from Pacific Beach to the Balboa Avenue Trolley Station.

Existing traffic volumes on Interstate 5 within the project vicinity are listed in Response AH-35. As shown, freeway segments surrounding the BASASP operate at a Level of Service C or D, which means they do not exceed capacity.

AH-43 The proposed BASASP would create a mixed-use village which would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit. The proposed BASASP would establish a village in a suitable location as indicated on the Village Propensity Map contained in the General Plan (General Plan Figure LU-1).

COMMENTS

RESPONSES

AH-44
(cont.)

- The project is located within a Transit Priority Area (TPA);
- The project is consistent with a specific plan for which an EIR was certified; and
- The project is consistent with an adopted sustainable communities strategy or alternative planning strategy. The City will conduct an Initial Study or other equivalent analysis for each subsequent project to determine if that subsequent project would meet these criteria for a CEQA exemption. If the analysis finds that the subsequent project meets these criteria, the City must further determine if any of the conditions specified in PRC Section 21166 would occur, including:
 - Substantial changes are proposed in the project which will require major revisions of the EIR;
 - Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions of the EIR; or
 - New information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available. Further environmental review would be conducted only if any of these conditions would occur as a result of the implementation of the subsequent development project.

++ Under what circumstances would projects be required to issue MNDs? i.e. something in between a "major revision" and nothing.

AH-45

Are there any currently adopted "sustainable communities strategy or alternative planning strategy." What is the definition of an "alternative planning strategy"? Please provide two examples.

AH-44 Each future development project would undergo review to determine if it would meet the criteria for the noted CEQA exemption, as identified in Section 1.1.2 of the PEIR. If it is determined that it does not meet the criteria for a CEQA exemption (the noted Senate Bill 743 exemption or any other CEQA exemption), then subsequent CEQA determination would be required. The type of CEQA determination would be made on a project-by-project basis.

AH-45 The terms "sustainable communities strategy" and "alternative planning strategy" are taken directly from Public Resources Code Section 2155.4 and pertains to plans that include strategies and measures to reduce greenhouse gas (GHG) emissions. San Diego Association of Government's *San Diego Forward: The Regional Plan* includes a Sustainable Communities Strategy element. This document was adopted in 2015 and as stated in Section 5.1.2.7 of the PEIR is a long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life-needs. Additionally, the City's Climate Action Plan, which was adopted in 2015, established GHG reduction targets and identifies actions and programs to reduce GHG emissions.

34.

5.2.4 Issue 1: Conformance to the Regional Air Quality

Strategy *Would the proposed BASASP conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP?* **5.2.4.1 Impacts** The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O₃. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O₃ NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and the CARB, and the emissions and reduction strategies related to mobile sources are considered in the RAQS and the SIP. The RAQS relies on information from CARB and SANDAG in order to project future emissions and determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. The CARB's mobile source emission projections and SANDAG's growth

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Section 5.2 Air

Quality projections are based on population and vehicle trends, and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans of each city and the County would be consistent with the RAQS. In the event that a project proposes development which is less dense than anticipated within the City's General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than anticipated in the City's General Plan and SANDAG's growth projections upon which the RAQS is based, the project would be in conflict with the RAQS and the SIP, and might have a potentially significant impact on air quality. *This situation would warrant further analysis to determine if the proposed project and the surrounding projects exceed the growth projections used in the RAQS for the specific sub-regional area.*

++ What would trigger such an analysis? Who would be accountable for it? [SEP]

35. Impacts on future residents not analyzed

Another measurement tool in determining consistency with the RAQS is to determine how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles travelled (VMT) both within the project planning area and the community plan area in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the RAQS. The proposed project would be consistent with the goals of the RAQS to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The proposed BASASP supports the multi-modal strategy of SANDAG's Regional Plan (RP) through improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station. Policies contained within the proposed BASASP's Land Use and Mobility chapters would serve to promote bus transit use as well as other

AH-46 As stated in Section 5.2.4.1 of the PEIR, additional analysis would be required in the case where a project proposes development that is greater than anticipated in a local agency's General Plan and the San Diego Association of Government's growth projections upon which the Regional Air Quality Strategy is based. The analysis would be conducted by the project proponent as part of the environmental review process.

AH-47 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances. Based on this and the other factors identified in Section 5.2.4.1 of the PEIR, it was concluded that the BASASP would be consistent with the goals of the RAQS to build compact, walkable communities close to transit connections and consistent with smart growth principles.

forms of mobility, including walking and bicycling. Furthermore, the proposed project's access to transit also results in the BASASP area being located within a designated Transit Priority Area (TPA) consistent with Senate Bill (SB) 743. This type of development is consistent with the goals of the RAQS for reducing emissions associated with new development.

AH-47
(cont.)

++ If the City does not build the sidewalks that are needed then the area should not qualify as this.

[SEP][SEP][SEP][SEP][SEP][SEP]

AH-48

What about analysis of sensitive receptors who would be living within 500 feet of I-5? And other congestion being increased by this Plan?

[SEP][SEP][SEP][SEP][SEP][SEP][SEP][SEP][SEP][SEP]

[SEP][SEP][SEP][SEP]

36. 5.12.3 Significance Determination Thresholds

As the City's CEQA Significance Determination Thresholds (City 2016a) do not establish specific significance thresholds for population and housing, the following analysis relies on Appendix G of the CEQA Guidelines. Impacts related to population and housing would be significant if the proposed BASASP would:

Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere; or

Induce substantial population growth in an area, either directly or indirectly.

5.12.4 Issue 1: Population Displacement

Would the proposed BASASP displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

AH-49

5.12.4.1 Impacts

The proposed project would re-designate some existing commercial areas to permit mixed-use residential uses and to increase the density of certain residential areas in accordance with City policies, goals, and regulations,

AH-48 Section 5.2, *Air Quality*, of the PEIR analyzes potential air quality impacts of the BASASP and identifies potentially significant air quality impacts associated with construction and operational emissions. The PEIR identifies mitigation to reduce air quality impacts (AQ-2 through AQ-4), but the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes air quality impacts are significant and unavoidable even though such impacts associated with future development proposals implemented under the BASASP may be less than significant or mitigated to below a level of significance with the identified mitigation.

AH-49 It is acknowledged that displacement of some existing uses, including residential land uses, could be removed through implementation of the BASASP. Per Table 5.1-1 in the PEIR, there are a total of 91 existing single-family residential units and 672 existing multi-family residential units within the BASASP. Table 5.2-5 of the PEIR identifies the land use assumptions used in the analysis of the proposed project at buildout and notes that 672 existing multi-family residential and 2 existing single-family residential units would remain under buildout conditions of the BASASP. Thus, full implementation of the BASASP could potentially remove up to 89 single-family residential units, but the existing multi-family units would remain. The BASASP contains specific policies to provide a diversity of housing types and affordable housing." For example, Policy 2.1.5 states, "Support diverse, balanced, and affordable housing." Policy 2.1.8 states, "Encourage the development of affordable and senior housing units at different income levels."

AH-49
(cont.)

as well as projected regional population growth. In the western-most portion of the BASASP area, temporary displacement of population or housing stock would occur if existing housing is demolished for future development. If displacement occurs, however, it would be temporary in nature. The BASASP area's total housing stock ultimately would increase compared to existing levels and those allowed under the adopted Pacific Beach Community Plan/LCP. With the implementation of the proposed project, the availability of multi-family housing would be substantially increased and, with the development of multi-family housing in locations with existing single-family housings, the potential for existing single-family housing would decrease, consistent with overall planning trends. No currently designated residential areas would be redesignated or rezoned to solely non-residential uses. While existing single-family housing would

decrease under the proposed project, the number of existing single-family and multi-family dwelling units would be replaced and supplemented by the addition of multi-family housing units. Under the proposed project, a total of 4,729 dwelling units could be developed, representing an increase of 3,966 units over the number of existing dwelling units in the BASASP area, and 3,507 units over 2050 SANDAG Forecast for the adopted Pacific Beach Community Plan.

Substantial numbers of existing housing or people would not be displaced, therefore necessitating the construction of replacement housing elsewhere. Rather, housing numbers in the area would rise and would be able to accommodate increased residential population near to regional transit service and other amenities.

++ While admitting "existing single-family housing would decrease" the City fails to quantify this. The existing single-family and multi-

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COMMENTS

RESPONSES

AH-49 (cont.) family housing west of E. Mission Bay Drive is some of the only remaining affordable housing in Pacific Beach. The City does not analyze how many of these units will be redeveloped in line with the increases in zoning. The City provides no evidence that the redevelopment/displacement potential is insignificant or temporary. The City does not require that the existing affordable units all be replaced. In fact, the goal of the upzone is that replacement of existing buildings with new ones. So let us not ignore that displacement will occur and it will not be temporary for those involved, especially in the existing apartments.

AH-50 37. Without either subsidies or rent control new housing will not be affordable in Pacific Beach. The City should support an increase in the rental vouchers supplied by the Housing Commission to low income renters.

AH-51 38. What is the City definition of a "Village"? Does the City agree that a main goal of a Village is for people to be able to live there without having to drive for basic services?

AH-52 39. What zoning would allow for fresh food grocery store? Any village has to have a grocery store within walking distance or it becomes what's known as a fresh-food desert where people have to drive to collect groceries or have to limit what they take on transit. What is the current minimum square footage for a grocery store? And how many customers does it need to merit the investment in a location? What kind of population capture does it require around it? Is the proposed village big enough to merit such an investment?

AH-53 40. Why the decrease in industrial zoning? What is the rationale? How was the size of the decrease determined?

AH-50 The BASASP contains specific policies to provide a diversity of housing types and affordable housing." For example, Policy 2.1.5 states, "Support diverse, balanced, and affordable housing." Policy 2.1.8 states, "Encourage the development of affordable and senior housing units at different income levels."

AH-51 Village is defined in the Strategic Framework section of the City's General Plan as "the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated." The City of Villages Strategy focuses growth into compact, mixed-use, and walkable villages that are connected to a regional transit system. Establishment of villages are intended to increase transportation choices Focused development and density adjacent to transit stops that link where people live to where people work, shop, and recreate, helps make transit convenient for more people.

AH-52 Grocery stores are permitted within the proposed commercial (CC-3-8, CC-3-9, CC-4-5, and CO-1-2) and residential zones (RM-3-8 and RM-4-10) within the BASASP area, in accordance with Tables 131-05B and 131-04B in the City's Municipal Code. See PEIR Figure 3-2 for the locations of these proposed zone classifications.

AH-53 The proposed rezone of land zoned IL-3-1 to OF-1-1 consists of approximately 1.4 acres within Rose Creek located north of Damon Avenue, west of Mission Bay Drive, and east of I-5. The proposed rezone to OF-1-1 was identified to provide consistency with the Flood Control/Open Space land use designation.

AH-54

41. As an established urban community, the existing infrastructure within this eastern portion of the Pacific Beach Community Plan area would be able to support the anticipated population growth without major additions or expansions which could induce additional growth. No new roads or roadway extensions would be required and, because the area is developed, there are no substantial areas of undeveloped land within the BASASP area that could induce population growth.

And

5.12.5.2 Significance of Impacts

No new or major expansion of infrastructure serving the area is anticipated to occur as a result of implementation of the proposed project. Furthermore, the proposed BASASP includes planning, design, and implementation strategies intended to accommodate project effects, such as housing provision and non-vehicular transportation options. Outside the BASASP area, project-related

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Section 5.12 Population and Housing

growth is not expected due to the areas being largely built out as an existing condition. As a result, impacts related to growth inducement would be less than significant.

++ A major problem in this Plan is lack of mitigation and expansion of the infrastructure necessary to make it work. The analysis in this PEIR contradicts these statements and the conclusion that impacts would be less than significant and that mitigation is not required.

The results of the EIR show that traffic will be unmanageable. It shows massive traffic congestion and putting thousands of addition trips into already congested intersection and the purpose of this plan is to directly induce population growth! The conclusion that impacts would be less than significant is contradicted by the technical evidence in the PEIR.

AH-54 The excerpt included in this comment is from Section 5.12.1 of the PEIR, which addresses population growth inducement. The comment states that there is not adequate mitigation or necessary infrastructure to support the implementation of the BASASP. Growth inducement can occur through the provision of new infrastructure, such as utilities or roads, in areas that are not served by such infrastructure, thereby opening up land areas that were previously inaccessible or not served by utilities. Consequently, these newly served areas could induce land development and associated population growth. The BASASP area is almost entirely developed and existing utility infrastructure and services are already provided to the area. As discussed in Section 5.14, Public Utilities, of the PEIR, necessary infrastructure improvements and analysis of needed upgrades would occur at the project level as future development projects are proposed and implemented. It is not anticipated that major expansion or additions of utility infrastructure would be required given the developed nature of the area and utility systems infrastructure that is already in place. Additionally, no new roadways or roadway extensions that would provide access to previously inaccessible areas are proposed. The PEIR discloses where impacts cannot be mitigated to less than significant. In those cases, impacts are considered significant and unavoidable because mitigation measures do not exist or are considered not feasible to reduce impacts to less than significant. See Response B-1 with regard to traffic impacts.

COMMENTS

RESPONSES

AH-54
(cont.)

The TIS assumed future year buildout to include 4,729 dwelling units (with an associated 28,380 trips), and 1,037,757 square feet of non-residential uses (with an associated 27,245 trips); for a total of 55,625 daily trips. In comparison to the current community plans, the proposed BASASP assumes approximately 3,500 additional dwelling units (resulting in approximately 24,500 additional trips) and nearly a 4,000-dwelling unit increase from existing dwelling units in the plan area (resulting in approximately 34,000 additional trips).

AH-55

42.The presumption that people will be ABLE to change to transit for work or shopping is speculative and past trolley stations have not attracted significant choice ridership. See Slides 3 & 4 of this online presentation: <https://www.slideshare.net/TheMissionGroup/introducing-the-quickway-proposal-a-vision-for-a-worldclass-transit-system-for-san-diego-46387912/3>

What else can the City do to mitigate the impacts should transit ridership not match their forecast estimates (since ridership has been lower than forecast in past trolley forecasts the City should have an alternative that matches lower, more realistic estimates for ridership.

AH-56

43. Does the City intend to ask the public to vote on repealing or raising the 30 foot Coastal Height Limit in the area?

If not, why have densities as high as 73 and 109 DU/AC? These densities clearly are not achievable with a 30 ft height limit and grants illegal zoning in the Coastal Height Limit Zone.

AH-55 The Traffic Impact Study prepared for the project was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual, including travel mode splits and allowable trip reductions for projects near transit stations. As part of the traffic analysis, a travel demand model was used to forecast volumes for different modes of travel. For the proposed project, the analysis was conducted with approximately 10 percent of trips using transit. The majority of the remaining trips were other vehicles. The analyses performed in the study reflect current and projected travel by mode using travel demand modeling specific to the area. For this reason, the suggested alternative is not warranted.

AH-56 Future development pursuant to the BASASP within the Coastal Zone and/or Coastal Height Limit Overlay Zone (west of Interstate 5) would be subject to a height limit of 30 feet. The proposed residential densities could be achieved through maximizing a site's buildable area and through the inclusion of smaller units.

COMMENTS

RESPONSES

AH-57	44. What are the DU and Population projections for the area? And are they based on the densities presented? What is the relationship between the # of DU being added and the population projections?	AH-57 Housing and population estimates are included in Tables 5.12-1 through 5.12-4 in Section 5.12, <i>Population and Housing</i> , of the PEIR. Section 3.5.1.1 of the PEIR states that the BASASP would result in an approximate future population of 8,800 at buildout, which results in a net increase on 6,525 persons in the BASASP area over population levels anticipated at buildout under the adopted Pacific Beach Community Plan.
AH-58	45. At what height would building in the Area block any public views?	
AH-59	46. Some Cities have identified that foreign ownership of properties that are not lived-in year round is contributing to a loss of rental units and affordable housing. What does the City know about foreign ownership of properties in the Pacific Beach Plan area? Are there known foreign owners in the Plan Area?	AH-58 As noted in Response AH-56, future development pursuant to the BASASP within the Coastal Zone and/or Coastal Height Limit Overlay Zone (west of Interstate 5) would be subject to a height limit of 30 feet. As discussed in Section 5.16.4 of the PEIR, the proposed BASASP would not substantially alter or block public views from public viewing area within the BASASP area.
AH-60	47. Some Cities have identified Short-Term-Vacation-Rentals as contributing to a loss of rental units and affordable housing. What is known about STVR rentals of properties in the Plan Area? In the Pacific Beach Community Plan Area?	
AH-61	48. The underpass of Balboa Ave under I-5 must be widened for pedestrian safety with barriers between pedestrians and cars before or concurrent with the trolley station opening . The existing conditions are dangerous for pedestrians and this are must be a priority for the City to complete the safest design for pedestrians from the station to the Village or the neighborhoods to the west. What are the City's next steps for completing this project? What steps need to be take to get the project completed as the station is going in?	<p>AH-59 The comments/questions regarding foreign ownership of properties does not raise any environmental issues with respect to the adequacy of the Draft PEIR and thus, no further response is required. It should be noted, however, that the BASASP contains specific policies to provide a diversity of housing types and affordable housing." For example, Policy 2.1.5 states, "Support diverse, balanced, and affordable housing." Policy 2.1.8 states, "Encourage the development of affordable and senior housing units at different income levels."</p> <p>AH-60 As this comment about short-term vacation rentals does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.</p> <p>AH-61 Please see Response AG-7.</p>

COMMENTS

RESPONSES

AH-62	<p>49. What is planned to happen to the land located just north of Balboa Ave and west of Morena, currently inside a cloverleaf? Please provide a park. Would a community garden be possible? Please provide access to allow public use.</p>	<p>AH-62 The BASASP designates the land for Light Industrial use consistent with the adopted land use designation of the Clairemont Mesa Community Plan. Any land use changes to this area will be considered as part of the Clairemont Mesa Community Plan Update.</p>
AH-63	<p>50. Is it allowed to build residential units or business buildings without any private parking at all in the Plan Area? Please answer for each type of zoning. I</p>	<p>AH-63 Future development proposals within the BASASP area would be required to provide adequate on-site parking in accordance with the City's parking standards.</p>
AH-64	<p>51. In areas without sufficient private parking close public parks, people will use the free park parking – even when it's illegal to park overnight, people do this all the time, especially in beach areas like this Plan Area. What is the City's estimate of how many cars will residents maintain in the new residential zoning? What will be the impacts of Village residents and guests using public parking nearby in Mission Bay Park? Will the City increase enforcement against overnight parking near new Villages? What is the mitigation for this?</p>	<p>AH-64 Future development proposals within the BASASP area would be required to provide adequate on-site parking in accordance with the City's parking standards such that the demand for off-site parking would not increase. Illegal parking would continue to be enforced by the City of San Diego. No mitigation is required because there is no associated significant impact resulting from the project.</p>
AH-65	<p>52, Will it be legal to park overnight at the trolley station parking?</p>	<p>AH-65 As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.</p>
AH-66	<p>53. Air Quality Mitigations not identified 5.2.4.3 Mitigation Framework Mitigation for inconsistencies with the RAQS would be as follows: AQ-1 The City shall provide a revised housing and employment forecast to SANDAG to ensure that any revisions to the population and employment projections used by the SDAPCD in updating the RAQS and</p>	<p>AH-66 Emissions from specific projects are determined on a project-by-project basis. Table 5.2-6 in the PEIR identifies the maximum daily operational emissions for the proposed BASASP. Mitigation framework is identified the PEIR (AQ-2, AQ-3, and AQ-4) that would include air quality modeling for specific development proposals implemented under the BASASP and incorporation of mitigation to reduce potential impacts. However, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes air quality impacts are significant and unavoidable.</p>

COMMENTS

RESPONSES

AH-66 (cont.)	<p>SIP will accurately reflect anticipated growth due to the proposed BASASP.</p> <p>5.2.4.4 Significance After Mitigation</p> <p>The proposed project would not conform with the RAQS and SIP and would result in a significant and unavoidable impact. These significant impacts would be reduced to less than significant when the RAQS and SIP are updated.</p> <p>++ What are the estimates of the emissions from planned projects that are above and beyond the RAQS and/or the SIP? What would be project-specific mitigations to reduce the impacts to below significance?</p>	<p>AH-67 The regional comprehensive plan is a regional plan that is prepared by the San Diego Association of Governments (SANDAG). San Diego Forward: The Regional Plan was adopted in 2015 by SANDAG and includes the regional comprehensive plan for the San Diego region. It is not implemented by the City of San Diego. Section 5.2, <i>Air Quality</i>, analyzes potential air quality impacts of the BASASP and identifies potentially significant air quality impacts and mitigation to reduce such impacts (AQ-1 through AQ-4).</p> <p>AH-68 Please see Response AE-34 with regard to emergency services and response times.</p>
AH-67	<p>54. With respect to SEC. 17, Section 132360.1 of the Public Utilities Code 132360 reads in part: "1.The regional comprehensive plan shall identify disadvantaged communities as designated pursuant to Section 39711 of the Health and Safety Code and include transportation strategies to reduce pollution exposure in these communities." Has the City identified disadvantaged communities as defined by the State of California in the Plan Area? What mitigations is the City proposing to reduce pollution exposures in the Plan Area?</p>	
AH-68	<p>55. What will be the reduction in response times throughout the day for ambulance transports from the Plan Area to the closest Regional Trauma Center at Scripps Memorial Hospital? Will there be an emergency lane available along I-5 north to Genesee, or will ambulances be dependent on cars moving out of the way of the traffic lanes? Will cars have room to move out of the way on the sides on the access ramp and on the freeway?</p>	

COMMENTS

RESPONSES

AH-69

56. "The City shall promote the establishment of Park and Ride facilities on or near East Mission Bay Drive, particularly in proximity to the proposed trolley station at Morena Boulevard and Balboa Avenue."

++ Please remove allowing Park & Ride facilities on East Mission Bay Drive. This needs to become, regardless of the ridiculous forecast for traffic, a pedestrian oriented street and placing Park & Rides ADDs car trips. [L SEP] [L SEP]

AH-70

57. "Minimize building setbacks, bringing buildings close to sidewalks; locate parking to the rear of lots, off of the alleys." [L SEP]

++ what are the minimum requirements for sidewalk width? The relationship of the scale of the building to the sidewalk and the street is critical. It is unclear that prescribing this is correct without knowing the sidewalk requirements and whether they are next to the street or not. Are any streets or landscaping allowed or required between the curb and the sidewalk? [L SEP] [L SEP]

AH-71

58. "Provide, if space permits, public plazas or courtyards along pedestrian-oriented streets to serve residents and workers. Encourage public art in these areas where appropriate." [L SEP]

++ "If space permits is extremely weak. If you require them to design it, space will permit it. If not, it won't. There needs to be a requirement or a formula to trigger a requirement." [L SEP] What are the REQUIREMENTS to provide public plazas or courtyards? What are any requirements to provide public art. How would it be "encouraged"?

AH-69 This comment identifies a specific policy contained in the Pacific Beach Community Plan. While it is a relevant policy with respect to the proposed BASASP (and identified as such in Section 5.1.2.2 in the PEIR), it is not included in the proposed BASASP. As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

AH-70 Please see Response AH-69.

AH-71 Please see Response AH-69.

COMMENTS

RESPONSES

AH-72

59. What is the City's basis for recommending the amount of square footage for commercial vs residential? With commercial retail space on the decline overall, shouldn't there be more housing?

AH-72 Please see the Balboa Avenue Station Area Specific Plan Proposed Build Out Assumptions memo regarding build out assumptions used in the Draft PEIR.

AH-73

60. To promote transit and pedestrian use along the community's commercial spines, mixed use commercial projects shall be allowed within an increased residential density of up to 43 dwelling units per acre or shared parking as an incentive, only if designed as a transit-oriented development through a discretionary permit process.

++ What are defined as the "community's commercial spines"???

++ what zones does this density bonus apply to? ++ Does it apply to: Community Village (0-109 du/ac) Community Village (0-73 du/ac)? Any others?

++ How was this 43 du/acre figure utilized in the traffic and air quality reports?

++ What percentage of space was assumed to take advantage of this increased residential density bonus?

AH-73 Please see Response AH-69. With regard to the density bonus, see Response AE-3.

AH-74 Building envelopes, lot sizes, and other development parameters for properties would be stipulated by the development standards of the proposed zone classification.

AH-75 This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR.

AH-74

61. What does the max building envelope look like for 109 du/acre and 73/du/acre?

AH-75

62. Would the City support the establishment of a Maintenance Assessment District as mitigation for impacts and to better ensure building of public infrastructure including but not limited to park maintenance, pocket parks and other specifics to be identified in the MAD process?

COMMENTS

RESPONSES

AH-76

63. What additional sewer capacity will be required to add to existing sewage systems and how will it be paid for?

64. Would this design for this underpass (Mission Center Rd under Friars Rd) be allowed under this plan or not (i.e. narrow sidewalk without any setbacks)? Would art be required or not along the walls and with an entrance treatment and how would it be decided?

AH-77



AH-76 As discussed in Section 5.14.5.1 of the PEIR, planned improvements to the City's sewer infrastructure system would increase capacity to serve approximately three million people through the year 2050. As individual projects are proposed under the BASASP, localized improvements will be identified and may be required as part of the project design and review of individual projects.

AH-77 As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

COMMENTS

RESPONSES

June 6, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, California 92123

RE: Response to the Balboa Station Specific Plan Draft Program Environmental Impact Report

The Clairemont Community Planning Group (CCPG) Balboa Station Ad Hoc Subcommittee appreciates the opportunity to submit the following comments regarding the Balboa Station Specific Plan Draft Program Environmental Impact Report (PEIR) dated April 2018. Our comments refer to the PEIR, and also to the Balboa Station Area Specific Plan (BSASP).

Transportation/Circulation, Air Quality, Noise (Mitigation)

In regards to the section, Transportation/Circulation, the PEIR concludes that the traffic gridlock as a result of the BSASP is significant and unavoidable. We disagree with this conclusion, as this is a foreseen and unacceptable result, and there should be a mitigation plan included in the Alternatives. Unfortunately, we saw the same conclusions in the sections on Air Quality and Noise, that the significant introduction of air pollutants was significant and unavoidable, and the significant increase in noise decibel was significant and unavoidable. In all three areas, these results are foreseen and unacceptable. A fully funded mitigation plan must be inserted into the Alternatives to lessen the impact to the residents of our communities.

Transportation/Circulation (Connection of the Community Village to the Trolley Station)

The primary area of concern in the PEIR is the removal of the pedestrian and bicycle connection between the Balboa Station and the Community Village and Mission Bay areas to the west. The bridge offers a significant benefit to the residents of our communities, and a gateway to the Mission Bay and beach areas. The opinion of the CCPG is the determination of impacts in the PEIR related to the Balboa Station Specific Plan are predicated on the completion of a "Shared-Use Pedestrian and Bicycle Connection" from Morena Blvd across or under the Interstate 5 freeway to the Community Village area to the west, which was once a defining element of this specific plan (see attached details).

The City's Climate Action Plan and SANDAG's Regional Transportation Plan target a concentration of efforts in Transit Priority Areas (TPA), such as the Balboa Station. The TPA is an area within one-half mile of a major transit stop. The BSASP, 7.1, provides this definition "A majority of the Specific Plan is within the TPA, defined as an area within ½ mile walking distance from a major transit stop which makes use of public transit a viable option." Without the pedestrian/bicycle bridge across Freeway 5, the planned high-density development in the Community Village and Mission Bay may be out of compliance. In addition, the PEIR does not address the additional mitigation need to account for possible density bonuses allowed under the Municipal Code, or compounded impacts caused by proposed density increases in vicinity of the Morena Corridor specific plan. Decisions regarding construction of a two-way Class IV Bicycle Track on Morena Boulevard will be addressed as part of mobility discussions during the Clairemont Plan Update Process.

AI-1 The Program Environmental Impact Report (PEIR) identifies mitigation for significant impacts related to air quality, noise, and traffic and discloses where impacts cannot be mitigated to less than significant. Please see Response B-1 regarding traffic. In the case of air quality and noise, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes noise and air quality impacts are significant and unavoidable even though such impacts associated with future development proposals implemented under the Balboa Avenue Station Area Specific Plan (BASASP) may be less than significant or mitigated to below a level of significance with the identified mitigation.

AI-2 The BASASP includes a policy (Policy 3.1.4) to support the San Diego Association of Governments (SANDAG) and the San Diego Metropolitan Transit System (MTS) to consider a bicycle and pedestrian access via a connection across I-5 from the Balboa Avenue Trolley Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park and Mission Boulevard. Identification of funding sources and implementation of the facility would require further coordination by SANDAG and MTS.

Please see Response AE-3 with regarding to the density bonus.

The BASASP proposes reconfiguration of the right-of-way along portions of Morena Boulevard that would allow for a two-way cycle track (Class IV bicycle facility) along the west side of Morena Boulevard to enhance bicycle access to the Balboa Avenue Trolley Station and connect to the City's bicycle network.

COMMENTS

RESPONSES

AI-3

It has been noted that the Metropolitan Transit System staff have been absent from all public meetings and discussion of the BASAP. Their absence gives us reason to question the assumptions used in the PEIR's Traffic study. The issues outlined in this letter has resulted in the CCPG concluding the City has not achieved its stated goal; the Balboa Trolley Station would remain disconnected from the "Transit Oriented" Village because of the absence of a pedestrian/bicycle bridge. Transit success depends on regional plans and visions that guide the integration of land use and transportation.

AI-4

Visual Effects/Neighborhood Character

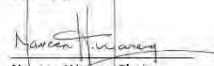
If a bridge was still in the plan, it would need to be tall enough to clear the freeway, railroad tracks and span approximately 300 feet across the freeway. This would create a significant visual impact that would need to be mentioned in Section 5.16 of the PEIR, Visual Effects and Neighborhood Character, and studied as it is within an important view shed overlooking Mission Bay Park. Yet there is no mention of a bridge alternative in Section 5.16. This clearly illustrates the City has no intention of pursuing construction of the bridge.

AI-5

Conclusion

The CCPG strongly believes that the impact assumptions of the PEIR are flawed and inaccurate, that the impact analysis includes a planned connection across Interstate 5, yet the connection is not concretely included in the BASAP or the PEIR. For the PEIR to be accurate and defensible, and the Balboa Station to be successful, the city must commit to constructing a shared pedestrian and bicycle connection across the freeway between the Balboa Station and the Community Village and Mission Bay Park to the west. We do not endorse a tunnel for multiple reasons. We ask the city to coordinate with MTS and SANDAG to plan and construct this connection and include this in the BASAP and the PEIR. Our analysis leads us to conclude the city has no intention of building the bridge, however, many of the impacts calculated in the PEIR are assuming that this connection will be constructed. The PEIR presents three alternatives, 'Preferred', 'Medium Density' and 'No Project'. In our opinion, a viable alternative has not been presented as an option, however, the CCPG is willing to work with the Planning Department to develop a reasonable alternative that meets project goals.

Sincerely,



Naveen Wahey, Chair
Clairmont Community Planning Group (CCPG)

cc: Michael Prinz, Senior City Planner, City of San Diego,
Harry Backer, Chair, CCPG Balboa Ave. Station Ad-Hoc Subcommittee,
Lynn Adams, Vice-Chair, CCPG Balboa Ave. Station Ad-Hoc Subcommittee,
Nicholas Reed, Vice-Chair, CCPG,
CCPG Balboa Station Subcommittee Members,
CCPG Board Members,
Councilwoman Barbara Bry, District 1, City of San Diego, Councilwoman Lorie Zapf, District 2, City of San Diego,
Councilman Chris Ward, District 3, City of San Diego, Councilwoman Myrtle Cole, District 4, City of San Diego,
Councilman Mark Kersey, District 5, City of San Diego, Councilman Chris Cate, District 6, City of San Diego,
Councilman Scott Sherman, District 7, City of San Diego, Councilman David Alvarez, District 8, City of San Diego,
Councilwoman Georgette Gomez, District 9, City of San Diego

AI-3

MTS provided input on certain design assumptions with the proposed network within the BASAP area. The Traffic Impact Study prepared for the project was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual, including travel mode splits and allowable trip reductions for projects near transit stations. See Response AH-2 regarding pedestrian and bicycle access to the Balboa Avenue Trolley Station.

AI-4

See Response AI-2 regarding pedestrian and bicycle access to the Balboa Avenue Trolley Station. This future access facility would require subsequent review and approval, including evaluation of potential environmental effects.

AI-5

The BASAP and the PEIR identify a future shared-use pedestrian and bicycle connection and as stated in Response AI-2, a policy is included in the BASAP to support implementation of this future facility. Details of this facility are not included in the PEIR because the type, design, and footprint of this connection is not known at this time. As mentioned in Response AI-4, this facility would require subsequent review and approval, including evaluation of potential environmental effects.

AI-6

Detail – Transportation/Circulation – Connection of the Community Village to the Trolley Station

The BSASP, Section 3.1.4 currently includes, “Support SANDAG and MTS to consider a bicycle and pedestrian access between the Balboa Avenue Station and the Specific Plan via a connection across I-5 from the Balboa Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park”. The PEIR does not include a current or future planned bridge connection in text, rather alludes to it in a vague manner in illustrations. Beginning with PEIR Project Description, Figures 3-3, 3-4, Pedestrian and Bicycle Facilities; dotted ovals that span the area of the station over the Freeway 5 and into the Village/Mission Bay area are labeled “Shared-Use Pedestrian and Bicycle Connection”. In Section 5.15.4, Alternative Transportation Modes, and Figures 5.15-5, -6, -7, -8, all include the dotted oval, “Shared-Use Pedestrian and Bicycle Connection”. The Pedestrian Analysis and Bicycle Analysis **do not include an explanation of the ovals in text or plans to build a bridge in the future**. Supporting our assumption that the city does not plan to build a connection is the wording “to consider” in the BASASP which does not obligate the city to pursue the connection. In addition, there are multiple disconnects in the BSASP that de-emphasize the connection.

The formation of the CCPG Balboa Station ad hoc subcommittee occurred in January 2016. The first mention of a pedestrian bridge was at a Pacific Beach Community Planning Group meeting on December 7, 2015 where the CCPG was also invited. Presentations by the City Planning Department included the pedestrian bridge across Freeway 5, **both in text and display** on 12/7/15, 5/10/16, 5/24/16, 11/2/16, 7/19/17. A clear connection across the freeway was shown on numerous maps and boards as well as a very detailed computer simulation illustrating a bridge at the eastern end of Bunker Hill Street with an elevator to allow access across the freeway and tracks. On December 14, 2017 the bridge was included in a presentation to the PB Planning Group, along with the village and increased density, however, on January 18, 2018 in the presentation to the CCPG, only ovals were visible, the bridge was absent, and only identified as ‘Issues Identified Through Outreach’ – an issue being Pedestrian Bridge connecting Balboa Station to Mission Bay. No explanation was provided on why the bridge was eliminated.

The Balboa Station sub-committee and community members have been extremely clear from the onset the pedestrian/bicycle connecting bridge was necessary for the BSASP to be successful, and the impact analysis clearly support the need for the bridge, however our comments and suggestions have not made it into the PEIR, nor have been addressed.

In comparing Figure 5.15-1 Existing Pedestrian Walkshed and Transit Stops to Figure 5.15-5 Future Planned Pedestrian Network and Station Walkshed, it clearly illustrates that the walkshed expands in the future to the Community Village areas all the way to Rosewood Street. This expansion of walkshed will only be possible once the implementation of the crossing connection across the freeway and tracks has been constructed. If this connection is not constructed, the impacts to Air Quality, Traffic/Transportation and Circulation, Greenhouse Gas Emissions, as well as Cumulative Impacts are inaccurate.

AI-6 Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding connections to the Balboa Avenue Trolley Station.

With regard to the expansion of the walkshed, it is acknowledged that the planned connection would facilitate access to areas in the southern portion of the BASASP area. Because the connection would serve non-motorized travel modes (i.e., walking and bicycling), it would not generate air emissions once it's constructed, nor would it create additional traffic trips by automobiles. Without the connection, the walkshed would remain as shown in PEIR Figure 5.15-1. This could potentially result in some additional traffic trips if people in the southern portion of the BASASP area choose to drive automobiles to access the trolley station; however, any additional trips would be negligible compared to the total trips generated by full implementation of the project and would not change the impact conclusions (direct and/or cumulative) contained in the PEIR regarding traffic, air quality, and/or greenhouse gas emissions.



June 11, 2018

Via electronic mail to: PlanningCEQA@sandiego.gov

Rebecca Malone
Environmental Planner
City of San Diego Planning Department
9485 Acro Dr. MS 413
San Diego, CA 92123

PROJECT NAME: Balboa Avenue Station Area Specific Plan
PROJECT No.: 586601/ SCH No. 2017071007

Dear Ms. Malone,

Thank you for the opportunity to comment on this project. This area of Pacific Beach is of extreme interest to The Environmental Center of San Diego and its board members. Several of us have called the area around Mission Bay home for decades. Throughout this time we have observed the development of the area and witnessed the impacts on the community and ecosystems.

The Environmental Center has several issues with the proposed plan. Our main concern is that we believe that the current plan draft places Rose Creek in a critically dire situation. Rose Creek washes into De Anza Cove and Mission Bay. We are concerned with the water quality of both Rose Creek, De Anza Cove and the wetlands in its current state. The proposed plan draft allows for an increase of population density of the area of up to 500% (1,221 to 4,729 residential units from 800) in an area that is already deficient in local parks according to the Draft Programmatic Environmental Impact Report (PIER).

Rose Creek itself is documented to be in poor condition and currently in need of habitat restoration. This proposed increase of population density would be detrimental to the area. Rose Creek cannot withstand the surge of trash, canine feces, graffiti and possible encampments that are inevitable with such a large population increase if Rose Creek is left unattended. The Draft

Environmental Center of San Diego * contactecsd@gmail.com * www.sandiegoeco.org

AJ-1

AJ-1 The Balboa Avenue Station Area Specific Plan (BASASP) does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

COMMENTS

RESPONSES

AJ-1
(cont.)

(PIER) has identified immitigable impacts in air quality, worsening traffic conditions and an increase to local park deficiency with the proposed plan.

Our solution to this particular issue is to dedicate Rose Creek as an Open Space Park with a part-time ranger from the open space parks division, and basic park services including waste management and trail maintenance. Dedicating Rose Creek as a park would improve the local park deficiency, stabilize our local wetlands and increase water quality of Rose Creek, Mission Bay and De Anza Cove. The City would also be able to apply for grants to fund habitat restoration and water quality improvements.

AJ-2

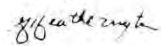
The Environmental Center also has concerns with the proposed plan in regards to air pollution, traffic conditions, and pedestrian accessibility to this station and Mission Bay. The pollution and traffic congestion will rise in relation to a population increase. The intersection of Mission Bay Drive and Garnet Ave is already heavily congested, dense with air pollutants and unsafe for pedestrians. This increase in housing poses unsafe conditions for those in the community wanting or needing pedestrian access to the transit station and Mission Bay. We need safe paths that can be traveled by foot, wheelchair, bicycle and other non-motor modes of transportation. We urge that you look at proposed plans by The Friends of Rose Creek and San Diego Bicycle Coalitions for alternative bike and pedestrian paths to be included in your final draft plans.

AJ-3

In conclusion, we find the use of a "Specific Plan" constrains the ability to mitigate what the City is saying is not mitigatable when it comes to air pollution and traffic congestion. Mitigation could occur at De Anza Cove as part of its revitalization.

Thank you for your time and for viewing our concerns. The Environmental Center of San Diego hopes that you will consider these issues and the issues submitted by Friends of Rose Creek, whose comments we support and endorse, and integrate the proposed changes into your project plans.

Sincerely,



George Heatherington
Board of Directors
Environmental Center of San Diego
805-835-1833
contactecsd@gmail.com

Environmental Center of San Diego * contactecsd@gmail.com * www.sandiegoeco.org

AJ-2

Please see Response B-1 regarding traffic. With respect to air quality, the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the Program Environmental Impact Report (PEIR) concludes air quality impacts are significant and unavoidable even though such impacts associated with future development proposals implemented under the BASASP may be less than significant or mitigated to below a level of significance with the identified mitigation.

Section 5.15.6.1 of the PEIR identifies a significant traffic impact at the intersection of Garnet Avenue and Mission Bay Drive during the PM peak period (Impact 5.15-6). Mitigation is identified in Section 5.15.6.2 of the PEIR (TRANS 5.15-6) that would reduce this impact to a less-than-significant level.

This intersection was also evaluated localized air pollution effect by conducting a carbon monoxide (CO) hot spot analysis. As identified in Table 5.2-7 of the PEIR, CO concentrations at this intersection would not exceed applicable standards and thus, the project would not result in significant air quality impacts at this intersection.

Regarding pedestrian accessibility, the BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.

COMMENTS

RESPONSES

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AJ-3 The project entails the adoption of a Specific Plan, which does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. Thus, the PEIR evaluates potential impacts at a programmatic level and identifies mitigation for significant impacts related to air quality and traffic and discloses where impacts cannot be mitigated to less than significant.

COMMENTS

RESPONSES

From: Carolyn Chase <carolyn@icontactweb.com>
Sent: Tuesday, June 12, 2018 9:12 AM
To: PLN_PlanningCEQA
Subject: Additional questions on Balboa Transt Station PEIR

Additional Questions/Comments on the
Draft Program Environmental Impact Report
SCH No. 2017071007 - Project No. 586601

Submitted by: Carolyn Chase, San Diego CA
Carolyn@icontactweb.com

AK-1

- 1a. Why was Rose Creek not included in the Plan?
- 2a. What would be benefits of including Rose Creek in the Plan?
- 3a. Does the City plan to add a water treatment facility in or around Rose Creek? If so what are the plans and what is the basis for them?
- 4a. Would the new development be required to pay any Development Impact Fees that could mitigate for their impacts on Rose Creek?
- 5a. The City is ignoring the direct impacts on Rose Creek while adding significant new population next to the creek. Who made the decision to do it this way?

AK-1 The Balboa Avenue Station Area Specific Plan (BASASP) includes only a small portion Rose Creek within Pacific Beach, which includes the area west of Interstate 5, north of Damon Avenue, and east of Mission Bay Drive. The proposed project would not directly impact Rose Creek. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Future development within the BASASP areas adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines to avoid indirect impacts and edge effects to Rose Creek. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

California Native Plant Society

San Diego Chapter of the California Native Plant Society
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June 11, 2018

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9485 Aero Drive, MS 413, San Diego, CA 92123
By e-mail to PlanningCEQA@sandiego.gov

RE: Balboa Avenue Station Area Specific Plan, PROJECT No.: 586601 / SCH No. 2017071007

Dear Ms. Malone,

Thank you for the opportunity to comment on Balboa Avenue Station Area Specific Plan ("Project") and its associated Draft Project Environmental Impact Report ("DPEIR"). The San Diego chapter of CNPS ("CNPSD") promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, and climate change as it affects both.

We have three comments on the Project and DPEIR.

First, **what are the impacts to Rose Creek, which is adjacent to the Project?** By excluding this important open space feature from the DPEIR, impacts to it were excluded improperly. The proper boundaries of the Project are anything that will be directly impacted by it, and Rose Creek can be considerably damaged by the Project if it is built ineptly. Planning has made this mistake repeatedly, for example in ignoring downstream effects from the Merge 56 project. Water flows downstream, and so do impacts. These need to be analyzed, even if they turn out to be not significant, as noted below.

Second, there are is considerable potential for cumulative impacts to the riparian areas of the Project, through the De Anza Cove Amendment to the Mission Bay Master Plan. **How will cumulative impacts to Rose Creek from these two projects be determined?** While we will certainly comment on the De Anza PEIR NOP, these two projects have been processed by City Planning in parallel as if they did not affect each other. They do. **Why was the Project proponent not instructed to analyze impacts to Rose Creek all the way to Mission Bay, thereby to deal with the cumulative impacts of the two projects?**

Third, the mitigation for indirect biological impacts is incomplete. The MIHPA states in section 1.5, Adjacency Management Issues (p.53): "Invasive Exotics Control and Removal...2. Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MIHPA as funding or other assistance becomes available. If possible, it is recommended that



Dedicated to the preservation of California native flora

AL-1

AL-2

AL-3

AL-1 The proposed project would not directly impact Rose Creek. The Balboa Avenue Station Area Specific Plan (BASASP) does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Future development within the BASASP areas adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines to avoid indirect impacts and edge effects to Rose Creek.

AL-2 The cumulative analysis contained in the Section 6.0 of the Program Environmental Impact Report (PEIR) considered the De Anza Revitalization Plan, as identified in Table 6-1 and in Figure 6-1 of the PEIR. The cumulative analysis considered potential cumulative effects to sensitive vegetation (Section 6.3.3 of the PEIR), as well as water quality impacts of downstream receiving waters, including Rose Creek and Mission Bay.

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removal begin upstream and/or upwind and move downstream/downwind to control reinvasion. Priorities for removal should be based on invasive species' biology (time of flowering, reproductive capacity, etc.), the immediate need of a specific area, and where removal could increase the habitat available for use by covered species such as the least Bell's vireo. Avoid removal activities during the reproductive seasons of sensitive species and avoid/ minimize impacts to sensitive species or native habitats. Monitor the areas and provide additional removal and apply herbicides if necessary. If herbicides are necessary, all safety and environmental regulations must be observed. The use of heavy equipment, and any other potentially harmful or impact-causing methodologies, to remove the plants may require some level of environmental or biological review and/or supervision to ensure against impacts to sensitive species."

The DPEIR states only that (p. 5.3-52), "No invasive non-native plant species shall be introduced into areas adjacent to the MHPA (i.e., landscape plans for projects shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA)." While this is good as it goes, the presence of non-native vegetation makes it obvious that the land owner has not complied with the MHPA requirement to weed.

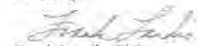
Why is there no requirement for the Project proponent to eliminate non-native invasives from the Project site to comply with the MHPA? It is not onerous. CNPS weeds riparian areas at \$1500/acre plus volunteer labor, and this site has 0.12 acres of non-native riparian vegetation. Even if commercial crews do the work, it is a trivial cost with a major benefit. Furthermore, weeding using the Bradley Method has become CNPSSD's major restoration method, and it is proving extremely effective in places like Lusardi Creek. Weeding is part of restoration.

Furthermore, there are health and public safety benefits of eliminating highly flammable plants like giant reed (*Arundo donax*) and palms such as Mexican fan palm (*Washingtonia robusta*) from the Rose Creek riparian corridor. These species are highly flammable, and most fires in the creeks of San Diego appear to involve these species burning. Reducing the flammability of the wild areas around the project protects both the residents and any homeless people who camp in them. It is a mitigation that pays dividends in both restoration and public safety.

Finally, clearing non-native vegetation and planting trees like willows and cottonwoods counts as carbon sequestration, which will decrease the Project's carbon emissions. **Why not clear the weeds from the Project area?**

Thank you for taking these comments. Please keep CNPSSD informed of all developments with this project, whether an EA is performed and the resulting and any documents and meetings associated with this project, at conservation@cnpssd.org and franklandis03@yahoo.com.

Sincerely,



Frank Landis, PhD
Conservation Chair
California Native Plant Society, San Diego Chapter

AL-3 Because the project would not directly impact Rose Creek, it also would not directly impact the Multi-Habitat Planning Area (MHPA) unless (as stated in Section 5.3.8.2 of the PEIR) impacts occur to those previously developed areas within the MHPA whereupon a MHPA Boundary Line Correction could be processed. Thus, future development within the BASASP would not occur within the Rose Creek riparian corridor where the noted existing invasives are present and the management directive for removal of invasives is not required.

AL-3
(cont.)


Friends of Rose Creek *

"Connecting Our Communities"

4629 Cass Street #188
San Diego CA 92109



June 12, 2018

Via email to PlanningCEQA@sandiego.gov

Rebecca Malone
Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

PROJECT NAME: Balboa Avenue Station Area Specific Plan
PROJECT No.: 586601 / SCH No. 2017071007

Dear Ms Malone,

Thank you for the opportunity to provide comments on the Draft Programmatic Environmental Impact Report (PEIR). Please note that the following groups have also signed this letter: Environmental Center of San Diego, Friends of Rose Canyon, and the San Diego Chapter of the Sierra Club. Please find our comments and concerns in the table below.

AM-1

Comment #	Draft PEIR Section	Comment
1.	Planning Area	We request the drawn boundaries of the project area be changed to include the Pacific Beach portion of Rose Creek as the current project boundaries were obviously drawn to exclude Rose Creek specifically. Rose Creek is specifically cited as "open space" in the Draft PEIR for this new village, but without additional resource support and protections, the village will create significant impacts on the creek. As Rose Creek is the primary natural feature in the area impacted by the project, its exclusion is especially troubling when the BASASP specifically relies on Rose Creek for multi-modal transportation options, providing open space, and connecting the community to the transit station.

**A member of the Rose Creek Watershed Alliance*

**A Friends Group of San Diego Canyonlands, Inc.*

Visit us on-line at <http://www.saverosecreek.org>

AM-1 The Balboa Avenue Station Area Specific Plan (BASASP) includes only a small portion Rose Creek within Pacific Beach, which includes the area west of Interstate 5, north of Damon Avenue, and east of Mission Bay Drive. The proposed project would not directly impact Rose Creek. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Future development within the BASASP areas adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines to avoid indirect impacts and edge effects to Rose Creek. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

COMMENTS

RESPONSES

Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 2 of 16

AM-2

Comment #	Draft PEIR Section	Comment
2.	Climate Resiliency under 5.6.5.1 Impacts on page 5.6-19	In addition to Strategy 5, protecting and enhancing wetlands is a key factor in climate resiliency. In fact, a healthy natural habitat and marshland is critical to protecting the built environment from storm surges such as Hurricane Katrina, where due to the lack of functioning wetlands, the storm surge was able to travel into the built environment. How will Rose Creek be enhanced to absorb more carbon, have a better tree canopy, and provide habitat for threatened species due to sea level rise and climate change? We strongly urge the City of San Diego to identify natural strategies for climate adaptation that protect Rose Creek and the surrounding community and to incorporate these strategies into the community plan amendment.
3.	Parks Deficiency Item 5.12.1.3 Parks and Recreation	<p>The General Plan standard for population-based parks is 2.8 useable acres per 1,000 residents, which can be achieved through a combination of neighborhood and community park acreages and park equivalencies. According to the Draft PEIR, a deficiency of approximately 80.91 acres exists in Pacific Beach while only 46.45 acres of population-based parkland exists in Pacific Beach. Where will the approximately 11 acres shortfall for this village based on the projected population come from in a location that is within walking distance or approximately 1/2 of a mile?</p> <p>We have identified three types of Neighborhood Parks would be appropriate in BASASP: "Neighborhood Park" "Mini Park" and "Pocket Park or Plaza"</p> <p>We strongly recommend a pocket park at the old work center at the corner of Mission Bay Drive and Daemon Street with restroom facilities for people walking/jogging/biking the Rose Creek Bike Path and Bikeway and interpretative signs on the history of Rose Creek and the Kumeyaay. The restroom facilities should be open to all people 24/7. This property is owned by the City of San Diego.</p> <p>The primary opportunity to add parkland in the area</p>

AM-3

AM-2 As stated in Response AM-1, the BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's MSCP Land Use Adjacency Guidelines for protected open space lands would apply to the area.

AM-3 The BASASP includes policies to provide community park facilities that meet the need of the future residential population and encourages new development to incorporate park amenities within their building footprint or on site. As discussed in Section 5.13.4.3 of the Program Environmental Impact Report (PEIR), future development proposals would be required to pay applicable development impacts fees that would fund public facilities, including parks.

The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

COMMENTS

RESPONSES

Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 3 of 16

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(cont.)

Comment #	Draft PEIR Section	Comment
		is to designate Rose Creek as a population-based park. Further actions should be to acquire easements from property owners to create a children's play area between the Rose Creek Bike Path and private property as well as benches for bird watching.
4.	Section 5.13, Public Services, Parks and Recreation	<p>The BASAP does not propose additional parkland and with the proposed additional population, the deficiency of parks will get worse. The proposed project will exasperate this issue as the City of San Diego states the proposed project is not required to address the current or projected deficits. As such, payment of DIFs, collected at the time of building permit are issued for specific future development proposals, would offset the impacts of proposed development on parks and recreation facilities.</p> <p>We are strongly opposed to this strategy, as these DIFs would not benefit the community that is being developed near the transit center. How can DIFs be redirected to projects in the Balboa Avenue Station Area Specific Plan? Adequate neighborhood parks are more important in high-density zones than in R-1 zoning where families have backyards to play in. Without park improvements in the project area, residents and their pets will not have access to parks without driving to them. As the goal of this project is to create a transit oriented and walkable neighborhood, increasing density without increasing parkland is counterproductive.</p> <p>The plan does not include parkland dedication for Rose Creek nor does it include funding sources for Rose Creek from developer impact fees. While the Friends of Rose Creek understands the City is opposed to this change, the community is supportive of it and is willing to work with the City to identify sources of funding. Furthermore, Table 5.1-9 the Recreational Element, item RE-A.3 "Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space." Without parkland dedication or some other management opportunity that</p>

AM-4

AM-4 Please see Response AM-3 regarding parks.

COMMENTS

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AM-4
(cont.)

AM-5

AM-6

Comment #	Draft PEIR Section	Comment
		maintains public ownership of the land and supports habitat restoration, water quality improvements, while insuring that adequate storm water can flow through the creek, this element will be hard to achieve. What are the strategies that the plan will use to incorporate item RE-A.3?
		RE-A-6 requires the City to "pursue opportunities to develop population-based parks." All the potential for population-based parks exists along Rose Creek. Why is the City opposed to implementing its own general plan policies?
5.	Item 5.13.3 Significance Determination Thresholds	Recommendations identified in item 5.13.3 require new parkland as the community is already deficient yet the plan does not propose additional parkland. We strongly disagree with this assessment and oppose any zoning density increases without the required amount of additional parkland within walking distance. We believe a determination of significance is warranted for the parks component of this plan. Please provide an explanation of the finding that this Draft PEIR is not required to address current or projected park deficiencies?
6.	Item 5.3.5.1 Impacts	How will negative shadowing impacts to Tier II and Tier IIIB habitats in the Rose Creek corridor be prevented? How will buffer zones be created between private developments along Rose Creek and the "open space"? How can the City of San Diego include easements for all development along Rose Creek to provide a buffer zone between the developed and the Tier II and Tier IIIB habitats? The buffer zone could be landscaped with appropriate native plants or suitable non-natives that are not invasive, drought tolerant and not on the Cal-IPC Inventory (available at https://www.cal-ipc.org/plants/inventory/)

AM-5 The community-wide parkland deficit is an existing condition and the project is not required to reconcile this existing deficiency. The project is however, required to fund its proportionate share of future parkland through established mechanisms. As discussed in Response AM-3, future development proposals would be required to pay applicable development impacts fees that would fund public facilities, including parks.

AM-6 Future development is not anticipated to result in adverse shade effects on sensitive habitat. As shown in PEIR Figure 5.3-3, the BASASP area is almost entirely developed and contains only a few small areas that contain sensitive vegetation communities. Properties adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines that would protect resources within Rose Creek. Furthermore, this area is located within the Coastal Height Limit Overlay Zone. Future development pursuant to the BASASP within the Coastal Height Limit Overlay Zone would be subject to a height limit of 30 feet. Structures of this height combined with required setbacks would not cast shadows within Rose Creek that would adversely affect biological resources within the creek.

COMMENTS

RESPONSES

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AM-6
(cont.)

AM-7

AM-8

Comment #	Draft PEIR Section	Comment
		Please restrict building heights to no more than 30 feet for properties boarding Rose Creek along with a sufficient easement to allow sunlight to reach biologic habitats and prevent shadowing on the biologic resources.
7.	Item 5.3.4 Issue 1 Sensitive Species 5.3.4.1 Impacts to Sensitive Plant Species	<p>We appreciate the high-level analysis of plant species that occur or could potentially occur in the project area. We disagree with the plan to allow project-level evaluations to occur without a full CEQA EIR being developed ahead of time, as the cumulative impacts of increasing the hardscape in this area are significant.</p> <p>According to CEQA, a cumulative impact refers to two or more individual effects that are considerable when taken together, or that compound or increase other environmental impacts (CEQA Guidelines Section 15355). CEQA requires the cumulative impacts discussion to reflect the likelihood that the impacts would occur and their severity if they did occur, but allows the discussion to contain less detail than must be provided for individual impacts.</p> <p>Please provide a cumulative scenario to identify and evaluate past, present, and reasonably foreseeable future projects within the cumulative study area that would be constructed or commence operation during the timeframe of activity associated with the proposed project and identify the impacts to Rose Creek.</p>
8.	Item 5.3.4 Issue 1 Sensitive Species 5.3.4.1 Impacts to Sensitive Wildlife Species	We appreciate the high-level analysis of wildlife species that occur or could potentially occur in the project area. However, we have concerns that the Western Osprey was omitted from the analysis. Currently the Osprey is listed as endangered on Audubon's climate designation impacts list. Osprey nest, fish, and reside in the project area as well as in the Rose Creek corridor. Ospreys survive on fish in Rose Creek, the Kendall-Frost Marsh, and Mission Bay Park. As Rose Creek is one of very few places for salt-water fish nurseries, it serves a critical component in the survival of this bird. While the Western Osprey is not endangered worldwide, there are limited places

AM-7 A cumulative analysis is contained in Section 6.0 of the PEIR. This analysis considered past, present, and reasonably foreseeable future projects in the vicinity of the BASASP, which are identified in Table 6-1 and Figure 6-1 of the PEIR. The cumulative analysis considered potential cumulative effects to sensitive vegetation (Section 6.3.3 of the PEIR), as well as water quality impacts of downstream receiving waters, including Rose Creek.

AM-8 The list of sensitive wildlife species with potential to occur in the BASASP area included in Table 5.3-4 of the PEIR is based on the California Department of Fish and Wildlife's California Natural Diversity Database, the U.S. Fish and Wildlife species database, MSCP mapping, and existing available environmental reports for projects in the vicinity (e.g., Rose Creek Bikeway). The Western Osprey did not appear on any of these sources.

Please see Response AM-7 regarding cumulative analysis.

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Comment #	Draft PEIR Section	Comment
		<p>within the City of San Diego where the Osprey nests, fishes, and hangs out. How will impacts to the Osprey be assessed in the PEIR in light of climate change?</p> <p>According to CEQA, a cumulative impact refers to two or more individual effects that are considerable when taken together, or that compound or increase other environmental impacts (CEQA Guidelines Section 15355). CEQA requires the cumulative impacts discussion to reflect the likelihood that the impacts would occur and their severity if they did occur, but allows the discussion to contain less detail than must be provided for individual impacts.</p> <p>Please provide a cumulative scenario to identify and evaluate past, present, and reasonably foreseeable future projects within the cumulative study area that would be constructed or commence operation during the timeframe of activity associated with the proposed project.</p>
9.	Item 5.3.4.3 Mitigation Framework	If mitigation is required, mitigation should be done as close to the impacted site as is technically feasible and in no case should mitigation be done outside the Rose Creek Watershed. There are multiple opportunities for Diegan Coastal Sage Scrub mitigation along Rose Creek between Grand Avenue and Mission Bay Drive. Please identify the preferred source of mitigation as being in the "village" that is being constructed on top of Rose Creek.
10.	Item 5.4.8 Issue 5: Conservation Planning, 5.3.8.1 Impacts for MHPA Consistency.	A MHPA Boundary Line Correction should only occur to accommodate the already built environment. Any new development should be precluded from implementation of a MHPA Boundary Line Correction. How will the PEIR insure that Boundary Line Corrections are not used damage the biologic resources in the MHPA Area?
11.	Item 5.3.6.4 Significant after Mitigation BIO-8.	We appreciate the emphasis on mitigation in close proximity to the impacts and within the same watershed.
12.	Table 5.16-1, UD-A.2.	The Urban Design Element of the General Plan

AM-8
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AM-9 Mitigation would be implemented at the project level in conjunction with specific future development proposals. As indicated in the identified mitigation framework for biological resources in Section 5.3 of the PEIR, mitigation requirements would be in accordance with applicable regulations (e.g., MSCP Subarea Plan, City's Biology Guidelines) with agency oversight, as applicable. Determination of appropriate mitigation sites would occur as part of this effort to be conducted at the project level. It should be noted that measure BIO-8 in Section 5.3.6.3 of the PEIR indicates that mitigation for impacts to jurisdictional waters is to be accomplished in close proximity to the impacts and usually within the same watershed.

AM-10 As indicated in Section 5.3.8.2 of the PEIR, a Multi-Habitat Planning Area (MHPA) Boundary Line Correction would be appropriate for existing developed areas that are mapped within the MHPA.

AM-11 The City acknowledges this comment in support of the mitigation requirements for BIO-8.

AM-12 Rose Creek is described in Section 5.16.1.2 of the PEIR as the primary open space feature within the BASASP area and photographs depicting its character are included in the PEIR as Figures 5.16-1a and 5.16-1b.

The BASASP would be consistent with General Plan Urban Design policies UD-A.2 and UD-B.8 because (1) the BASASP does not propose any changes to land use within Rose Creek; the parcels would remain designated open space, and (2) the recreation chapter of the proposed BASASP incorporates the concept of a linear park for the Rose Creek open space (within specific policies of that chapter).

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AM-12
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Comment #	Draft PEIR Section	Comment
	UD-B.8 Urban Design Element Policies Related To Visual Quality	provides guidance of using open space to create community character. Without including Rose Creek in the visual character, the Draft PEIR omits one of the primary features of this area. Specifically the figures following Table 5.16-1 are remiss in not taking photos towards the creek to show the view. How does the proposed village in the BASASP intent to implement urban design elements UD-A.2 and UD-B.8?
13.	Table 5.16-1, UD-F.1, Urban Design Element Policies Related To Visual Quality	This urban design element is focused on arts and culture. What methods will the BASASP plan use to integrate arts and culture into the project area? How does the BASASP propose to integrate Kumeyaay ethnohistory into the project area?
14.	5.16.2.2 Pacific Beach Community Plan/LCP	As the Pacific Beach portion of the BASASP is within the designated Coastal Zone and adjacent to a major coastal resource (Mission Bay Park), how will the existing Pacific Beach Community Plan effort to focus on Visitor serving businesses in the area closest to Mission Bay Park be accomplished in the BASASP? How will this plan preserve significant environmental resource areas, such as Rose Creek in their natural state? How will this plan improve access to Mission Bay Park for residents and visitors?
15.	5.16.3 Significance Determination Thresholds	How was the determination made that this project will not "negatively and substantially alter the character of the neighborhood"?
16.	Item 6.3.3 Biological Resources	The Draft PEIR identifies the wetland and riparian habitats as being covered under the City's MSCP subarea plan, how will increased amounts of trash and usage impact this area?
17.	Scope of Draft PEIR	As Rose Creek is referenced in the Draft PEIR 122 times and is identified as the "open space" for the proposed village, all portions of Rose Creek within Pacific Beach need to be added into the BASASP planning area and the Draft EIR should be recirculated for comments.

AM-13 The BASASP includes policies in the Urban Design chapter related to enhancements of gateways and the public realm. Enhancements could include treatments that integrate art or cultural amenities.

AM-14 The project proposes to re-designate some areas within the BASASP area to Community Village. This re-designation would allow for future redevelopment with transit-orientated development pursuant to the proposed land use designation and zone classification. As noted in Section 5.1, *Land Use*, of the PEIR, the southwestern portion of the BASASP area (south of Garnet Avenue and west of Interstate 5) is located in the Coastal Zone (refer to Figure 5.3-2 in the PEIR), and the western portion of the BASASP area (west of Interstate 5) is located within the Coastal Height Limit Overlay Zone. All of the areas proposed to be re-designated as Community Village would be located within this portion of the BASASP area that is within the Coastal Zone and/or Coastal Height Limit Overlay Zone. The southern portion of the BASASP, which includes areas that are proposed as Community Village are closest to Mission Bay Park and could be redeveloped with visitor-serving commercial uses subject to the allowable uses of the proposed zone classifications.

As stated in Response AM-1, the BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's MSCP Land Use Adjacency Guidelines for protected open space lands would apply to the area.

As outlined in the Mobility Chapter of the BASASP, multi-modal improvements are identified along public roadways to enhance access to Mission Bay Park. Pedestrian and bicycle crossings would be provided to cross Grand Avenue at E. Mission Bay Drive and Rosewood Street, which currently do not have crossings. Bicycle and pedestrian facilities would be provided on the south side of Grand Avenue providing connections to Mission Bay Park. Vehicle routes to Mission Bay Park are maintained through the existing routes that exist today.

COMMENTS

RESPONSES

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- AM-15 Detailed analysis of potential neighborhood character impacts that support the less-than-significant impact conclusion is contained in Section 5.16.5 of the PEIR.
- AM-16 Potential indirect impacts such as trash/litter and associated edge effects to sensitive habitat within Rose Creek would be addressed through compliance with the City's MSCP Land Use Adjacency Guidelines that would be required for future development adjacent to Rose Creek.
- AM-17 Please see Response AM-1.

COMMENTS

RESPONSES

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AM-18

AM-19

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AM-22

Comment #	Draft PEIR Section	Comment
18.	Item 5.3.7.1 Impacts	Which specific protections, regulations, and/or designations apply to the designation of Rose Creek within the BASASP as "Open Space" under the City of San Diego General Plan Open Space Element? The current language in this section is vague and unclear. As all the land around Rose Creek is developed, the wetlands serve as the only wildlife corridor between Mission Bay Park and specifically the Kendall-Frost Reserve and the Rose Canyon and Marian Bear Open Space Parks.
19.	Conservation Elements from General Land Use Policy San Diego, CE-A.1, CE-A.3, and CE-A.12	Under the City of San Diego's General Plan Conservation Element, strategies must be implemented to address the Heat Island Urban Effect, protect open space, and adapt to climate change. Elements: CE-A.2, CD-A.3, and CE-A.12. How will the protection of Rose Creek serve to further this conservation element?
20.	Table 5.3-5, Conservation Element-CE-B.1	In table 5.3-5, Conservation Element-CE-B.1 identifies the pursuit of formal dedication of existing open space areas (sub item f). What are the hurdles other than a lack of political will to pursue park designation or dedication for Rose Creek in the project area? Would the City of San Diego be willing to address parkland dedication if a maintenance assessment district or other permanent funding source was provided to address maintenance, habitat restoration, water quality improvements, and flood control protections?
21.	Table 5.3-5, Conservation Element CE-C.1	Rose Creek downstream of Garnet Avenue is coastal wetlands encompassing salt marsh and mud flat habitats. Does the City of San Diego consider this section of Rose Creek subject to the mandate to protect, preserve, restore, and enhance coastal wetlands? If yes, the PEIR should identify strategies and funding sources to take action on this mandate. If no, the PEIR should explain why Rose Creek downstream of Garnet Avenue is not an important coastal wetland and delineate the criteria used for such a designation?
22.	Section 5.3, page 5.3-31, Litter/Trash, Priority 1, Item 1	This item indicates the City will provide and maintain trashcans and bins at trail access points as well as removing litter and trash on a regular basis. What is

AM-18 Section 5.3.1.4 identifies Rose Creek as potential wildlife movement corridor. As stated in Response AM-1, the BASASP does not propose any changes to land use within Rose Creek. The parcels of Rose Creek within the BASASP area would remain designated open space (refer to PEIR Figure 3-1).

AM-19 By designating Rose Creek (the portion within the BASASP area) as open space, the BASASP would be consistent with the noted Conservation Element policies through protection of open space, which in turn reduces the urban heat island effect.

AM-20 Please see Response AM-3.

AM-21 The portion of Rose Creek within the BASASP, as well as downstream portions of Rose Creek are considered coastal wetlands. Consistent with this policy, the BASASP would protect and preserve the Rose Creek portion within the BASASP area through land use controls by designating it as open space. The project does not provide protection for downstream reaches of Rose Creek through land use controls because they are located outside of the BASASP area.

AM-22 The referenced PEIR section lists management directives for MHPA lands. While MHPA lands occur within the BASASP area, none would be impacted by the implementation of the BASASP unless (as stated in Section 5.3.8.2 of the PEIR) impacts occur to those previously developed areas within the MHPA whereupon a MHPA Boundary Line Correction could be processed. Accordingly, the proposed BASASP and subsequent future development under the BASASP would not be required to implement this management directive.

COMMENTS

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Comment #	Draft PEIR Section	Comment
		the timeline for implementation of and funding source for these trashcans? Please provide a more thorough explanation of what "remove litter and trash on a regular basis" means. Is that weekly, monthly, quarterly, annually or less frequently? How will the need to remove trash be identified by the responsible City departments?
23.	Section 5.3, page 5.3-31, under Litter/Trash and Materials storage, Priority 1, Item 4,	The Draft PEIR identifies the requirement to keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement. How will the undercrossing be monitored to insure obstructions to wildlife movement are not occurring? Which department will be responsible for monitoring this and how frequently will it be monitored?
24.	Section 5.3, Item 5.3.1.4 Wildlife Movement Corridors	In the final PEIR, please note that the City of San Diego has plans to restore the property currently occupied by Campland-on-the-Bay to natural habitat that will make the linkages between Rose Creek and Kendall-Frost Reserve contiguous and encourage further wildlife movement in these areas. While outside the scope of this PEIR, the potential to enhance the wildlife corridor upstream of the BASASP remains and should this effort be undertaken separately, wildlife movement would be more feasible between Rose Canyon Open Space Park and Marian Bear Open Space Park in the north to lower Rose Creek in the BASASP planning area in the south and the wetlands habitats of Mission Bay Park. How is this opportunity identified in the BASASP PEIR?
25.	Item 5.3, on Page 5.3-3, under Diegan Coastal Sage Scrub (Tier II)	Diegan coastal sage scrub exists along the west side of Rose Creek south of Garnet and north of Grand Avenue in a short stretch. While technically outside the artificial boundaries of the BASASP, please include this habitat in the discussion of Diegan Coastal Sage Scrub in the area.
26.	Mitigation Framework Item 5.3.5.3, BIO-6 Upland Habitats.	Please identify the west bank of Rose Creek between Grand and Garnet Avenues as an area suitable for mitigation. The Friends of Rose Creek and the Nature School have been enhancing this area for over 20 years and there is still much area left to be restored. This area would be an appropriate mitigation site for

AM-23 Please see Response AM-22.

AM-24 The cumulative analysis contained in the Section 6.0 of the PEIR considered the De Anza Revitalization Plan, as identified in Table 6-1 and in Figure 6-1 of the PEIR. The proposed BASASP does not include enhancements to Rose Creek (either within the BASASP area or upstream reaches); the portion of Rose Creek within the BASASP area would remain as designated Open Space.

AM-25 The discussion in Section 5.3.1.1 of the PEIR addresses land area within the boundaries of the BASASP. While other areas outside of the BASASP may contain sensitive habitat, vegetation was mapped only within the BASASP area.

AM-26 Please see Response AM-9.

COMMENTS

RESPONSES

Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 10 of 16

AM-26
(cont.)

AM-27

AM-28

AM-29

AM-30

Comment #	Draft PEIR Section	Comment
		impacts to the areas further away from Rose Creek and it would be appropriate to consolidate habitat into a contiguous corridor.
27.	5.1.2.2 Adopted Community Plans, page 5.1-19	The establishment of Park and Ride facilities on or near East Mission Bay Drive is in direct opposition to creating a walkable community village. How will such a Park and Ride decrease traffic in this high-density area?
28.	Mobility Element Policies Related to Multi-Modal Transportation Improvements, Table 5.1-7, ME-F.3	Identifies the goal to "Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists." However, without any dedicated funding stream there is no indication that the City will do future maintenance on existing and under constructions bike paths, as they currently do not perform any maintenance on the Rose Creek Bike Path. Therefore, we recommend that the City identify a source of funding for maintenance of the existing Rose Creek Bike Path as well as the Rose Creek Bikeway currently under construction by SANDAG that will insure maintenance is performed quarterly at a minimum with more frequent maintenance preferred. If these trails are to be utilized by a wide cross section of the community, they must be safe, clean, and pleasant to use. Furthermore, any attempt to increase usage of this area must be accompanied by trash receptacles to reduce the amount of trash ending up in the creek. What are the implementation strategies for the goal to "Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists?"
29.	5.2.7 Issue 4: Impacts to Sensitive Receptors on page 5-2.18	The intersection of Garnet Avenue at Mission Bay Drive is identified as a location of a Carbon Monoxide Hot Spot, yet this is the same intersection that users of the Trolley will be forced to traverse. How will the City reduce CO in order to encourage non-motorized uses of this area? How will this health risk will be mitigated?
30.	Section 5.2.7.1 Impacts, Carbon	While we understand that Table 5.2-7 shows the results of CO Modeling under the California Air

AM-27 This comment identifies a specific policy contained in the Pacific Beach Community Plan. While it is a relevant policy with respect to the proposed BASASP (and identified as such in Section 5.1.2.2 in the PEIR), it is not included in the proposed BASASP. No policies are contained in the BASASP that call for park-and-ride facilities.

AM-28 This comment identifies a specific policy contained in the General Plan Mobility Element. The proposed BASASP is consistent with this policy in that it would provide bicycle improvements that are identified in Section 3.3 of the BASASP and include a variety of facilities within the area for bicyclists of different abilities. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding the Infrastructure Finance Study.

AM-29 The intersection of Garnet Avenue and Mission Bay Drive was evaluated for localized air pollution effect by conducting a carbon monoxide (CO) hot spot analysis. As identified in Table 5.2-7 of the PEIR, CO concentrations at this intersection would not exceed applicable standards and thus, the project would not result in significant air quality impacts at this intersection and o mitigation is required.

AM-30 Please see Response AM-29 with regard to CO hot spots.

COMMENTS

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AM-30
(cont.)

AM-31

Comment #	Draft PEIR Section	Comment
	Monoxide Hot Spots.	Quality Limits identified in Table 5.2-2, we feel very strongly that reducing CO emissions and increasing plants and trees in a pedestrian friendly neighborhood is critical. Therefore, we would like to propose that a one foot wide, 3 foot tall hedgerow buffer be planted between the sidewalk and the street along Garnet Avenue to Soledad Mountain Road and along Mission Bay Drive/East Mission Bay Drive between the Interstate 5 North on-ramp and the Interstate 5 South on-ramp to use plant power to help lower CO emissions inhaled by pedestrians, provide a buffer between pedestrians and traffic, which should help improve walkability in the area. How can this recommendation be added to the design element?
31.	Table 5.2-8 – Carb Land Use Siting Recommendations and 5.8.4 Issue 1: Health Hazards	<p>According to the State of California, AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE prepared by the California Air Resources Board (available at https://www.arb.ca.gov/ch/handbook.pdf), identifies siting recommendations to protect the health of sensitive populations.</p> <p>From the handbook: “Sensitive individuals refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses).” (Page 2 of Air Quality and Land Use Handbook)</p> <p>The handbook recommends that residential uses be sited at least 500 feet away from Freeways and identifies the increased risk of developing cancer in sensitive populations ranges from 300 to 1,700 percent. The additional cost of medical expenses, lifetime loss of income, and death does not warrant siting residential homes in the area east of Del Rey Avenue or potentially even east of the alley between</p>

AM-31 As stated in Section 5.2.7.1 of the PEIR, the siting distances recommended by the California Air Resources Board (CARB) that are identified in Table 5.2-8 of the PEIR are advisory and are not required buffer zones for new development. These will be considered as part of the project-specific approval process associated with future development proposals within the BASASP area.

COMMENTS

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Comment #	Draft PEIR Section	Comment
		<p>Del Rey and Revere Avenue south of Balboa or within 500 feet of the freeway north of Balboa Avenue. These areas are better suited to commercial office space or clean and light industrial businesses and can provide jobs for people living in the area so they do not need to commute to Sorrento Valley by car.</p> <p>Furthermore, we request that BASASP incorporate recommendations from The Bay Area Quality Air Management District 2016 guidebook "Planning Healthy Places: A Guidebook for Addressing Local Sources of Air Pollutants in Community Planning" available at http://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf?la=en, makes a number of best practices when it comes to siting sensitive uses such as residential developments that include:</p> <ul style="list-style-type: none">• Plan sensitive land uses as far from local sources of air pollution such as freeways as is feasible.• Consider incorporating solid barriers into site design, similar to a sound wall, between buildings and sources of air pollution (for example, a freeway).• Plant dense rows of trees and other vegetation between sensitive land uses and emission source(s). Large, evergreen trees with long life spans work best in trapping air pollution, including: Pine, Cypress, Hybrid Poplar, and Redwoods.• Consider limiting sensitive land uses on the ground floor units of buildings near non-elevated sources, e.g. ground level heavily traveled roadways and freeways. <p>We oppose the building of new residential units within 300 feet of Interstate 5 and within 150 of gas stations as outlined in the Bay Area Quality Air Management District Guidebook and believe that all</p>

AM-31
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Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 13 of 16

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(cont.)

Comment #	Draft PEIR Section	Comment
		<p>of the above recommendations should be implemented to reduce exposure to freeway pollutants in residential areas while providing employment opportunities in the areas immediately adjacent to Interstate 5.</p> <p>Will sellers and/or property managers of housing within 500 feet of the freeway be required to disclose to potential renters/owners, the health risks to sensitive populations?</p>
32.	Table 5.3-5 City Of San Diego General Plan Policies Relating To Biological Resources , Item CE- E.2	<p>On April 7, 2015, the State Water Board adopted an Amendment to the Water Quality Control Plan for Ocean Waters of California (Ocean Plan) to Control Trash and Part 1 Trash Provision of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries (ISWEBE Plan). Together, they are collectively referred to as 'the Trash Amendments'.</p> <p>TRASH shall not be present in inland surface waters, enclosed bays, estuaries, and along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.</p> <p>MS4 permittees with regulatory authority over PRIORITY LAND USES shall be required to comply with the prohibition of discharge in Chapter IV.A.2.a herein by either of the following measures:</p> <p>(1) Track 1: Install, operate, and maintain FULL CAPTURE SYSTEMS for all storm drains that captures runoff from the PRIORITY LAND USES in their jurisdictions; or</p> <p>(2) Track 2: Install, operate, and maintain any combination of FULL CAPTURE SYSTEMS, MULTI-BENEFIT PROJECTS, other TREATMENT CONTROLS, and/or INSTITUTIONAL CONTROLS within either the jurisdiction of the MS4 permittee or within the jurisdiction of the MS4 permittee and contiguous MS4 permittees. The MS4 permittee may determine the locations or land uses within its jurisdiction to implement any combination of controls. The MS4 permittee shall demonstrate that such combination</p>

AM-32

AM-32 As discussed in Section 5.14.6 of the PEIR, future development projects would be subject to compliance with applicable waste management requirements and City ordinances. Projects that would exceed established thresholds of solid waste are required by the City to prepare and implement a Waste Management Plan that targets a 75 percent waste reduction. Future project would also be required to comply with applicable water quality regulations.

COMMENTS

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Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 14 of 16

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AM-36

Comment #	Draft PEIR Section	Comment
		<p>achieves FULL CAPTURE SYSTEM EQUIVALENCY. The MS4 permittee may determine which controls to implement to achieve compliance with the FULL CAPTURE SYSTEM EQUIVALENCY. It is, however, the State Water Board's expectation that the MS4 permittee will elect to install FULL CAPTURE SYSTEMS where such installation is not cost-prohibitive.</p> <p>The final Trash Amendments define priority land uses as land uses that are actually developed (i.e., not simply zoned) as high density residential, industrial, commercial, mixed urban, and public transportation stations.</p> <p>Due to the transit zone proximity, the proposed high density development area, and the approximately 3.75 tons of trash that is currently being picked up by the Friends of Rose Creek yearly, what is the trash reduction implementation plan for the BASASP under the MS4 permit?</p>
33.	5.9.1.1 Surface Waters and Drainage	On Page 5.9-1, The Storm Water Standards Manual, which was most recently updated in 2016, requires certain development projects classified as "Priority Development Projects" to include permanent post-construction BMPs in the project design. Will projects in the BASASP be considered "Priority Development Projects"? What permanent post-construction BMPs will be mandated for development projects?
34.	Section 5.9, Hydrology, Water Quality, and Drainage on page 5.9-2	The PEIR identifies the existing beneficial uses for Rose Creek: Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Warm Freshwater Habitat (WARM), and Wildlife Habitat (WILD). How is the BASASP going to enhance the beneficial uses that have been degraded due to decades of City neglect?
35.	Overall comments	Why didn't the City integrate the watershed planning principles identified in the Rose Creek Watershed Opportunities Assessment document previously approved by the City Council into the entire BASASP Project to protect and enhance the environment with sustainable development?
36.	Land use and development general	Under the City of San Diego Land Development Manual (City 2012) Page 8, wetland buffers are

AM-33 Types of Priority Development Projects (PDP) are defined in the City's Storm Water Standards Manual (Section 1.4). If future development proposals within the BASASP area meet the definition of a PDP, they would be required to implement applicable post-construction BMPs, which are described in the BMP Design Manual of the Storm Water Standards Manual. This would be determined on a project-specific basis.

AM-34 The BASASP does not propose any changes to land use within Rose Creek. The portion of Rose Creek within the BASASP area would remain designated open space. Future development within the BASASP area adjacent to Rose Creek would be subject to compliance with the City's MSCP Land Use Adjacency Guidelines to avoid indirect water quality impacts to Rose Creek.

AM-35 As this comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR, no further response is required.

AM-36 As stated in Section 5.1.4.1 of the PEIR, future development within the BASASP area adjacent to Rose Creek would be required to adhere to and be consistent with the City's Environmentally Sensitive Lands Regulations, which include provision of wetland buffers.

COMMENTS

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Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 15 of 16

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AM-37

AM-38

Comment #	Draft PEIR Section	Comment
	design	<p>required to protect the functions and values of the wetlands. In terms of buffers, we believe a natural and low maintenance buffer would consist of a hedgerow consisting of a mixture of native plant species that provide habitat for small birds such as Lemonade Berry (<i>Rhus integrifolia</i>), Toyon (<i>Heteromeles arbutifolia</i>), Laurel Sumac (<i>Malosma laurina</i>), California Buckwheat (<i>Eriogonum fasciculatum foliolosum</i>) to name just a few. Please identify a native plant hedgerow as a preferred design element for properties adjacent to Rose Creek. For background on the benefits of using a hedgerow as a buffer, see https://www.tenthacrefarm.com/2015/03/10-reasons-to-plant-a-hedgerow/.</p> <p>The Final PEIR should include a special design element for properties adjacent to the creek requiring planting a native plants hedgerow as the preferred buffer for all future development of parcels along Rose Creek.</p>
37.	Mitigation	<p>The Final PEIR should identify Rose Creek in Pacific Beach as the preferred mitigation site for all impacts. There are multiple opportunities for Diegan Coastal Sage Scrub mitigation along Rose Creek between Grand Avenue and Mission Bay Drive as well as fresh and salt-water riparian opportunities.</p>
38.	Transportation Analysis	<p>How much vehicle traffic would be re-directed to bike/pedestrian traffic and be routed away from the intersection of Mission Bay Drive/East Mission Bay Drive and Garnet/Balboa Avenues by building the proposed bridge over I-5 identified in the BASAP as well as the proposed Bike Bridge at Hwy 52/I-5 as mitigation for cumulative vehicle traffic impacts in this area?</p>

AM-37 Please see Response AM-9.

AM-38 Construction of the noted pedestrian/bicycle bridges is not being proposed nor required as mitigation for cumulative traffic impacts of the proposed project. As such, the question about traffic diversion is not relevant.

Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 16 of 16

These comments are submitted on behalf of the Friends of Rose Creek, the Environmental Center of San Diego, the Friends of Rose Canyon, and the San Diego Chapter of the Sierra Club.

Respectfully,



Karin Zirk, Ph.D.
Executive Director
Friends of Rose Creek
~ Connecting our Communities ~



George Courser
Conservation Committee Chair
Sierra Club San Diego

Debby Knight
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Friends of Rose Canyon



Pamela Heatherington
Founding Board Member
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COMMENTS

RESPONSES

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June 12, 2018

Submitted via email to PlanningCEQA@sandiego.gov

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PROJECT NAME: Balboa Avenue Station Area Specific Plan
PROJECT No.: 586601 / SCH No. 2017071007

Dear Ms Malone,

Thank you for the opportunity to comment on the Draft Programmatic Environmental Impact Report (PEIR) for the Balboa Avenue Station Area Specific Plan (BASASP).

From a high-level perspective, the Draft PEIR is a complete disappointment. The Pacific Beach Community is primarily interested in pedestrian and bicycle access to the Mid-Coast Trolley Station. Mobility is the primary concern. However, this Draft PEIR does not address the mobility goal as it excludes from the plan the community's requested mobility improvements.

The language of SB-743 is vague when it comes to the ½-mile designation to a transit center for infill development. In other words, I understand the City is conformant to CEQA by designating transit priority zone within ½ mile even if there is 1 mile or more walk required a pedestrian to access the transit center. While this project may fall within the letter of the law, without the crossing, it does not fall within the spirit of the law and will do little to reduce congestion.

Comment Number	Comment
1.	Both the medium and high density alternatives are too similar to even been considered a reasonable range of alternatives. The PEIR should include an alternative that at build out would have a number of residents approximately in the middle of the current Pacific Beach Community Plan and the High Density Alternative studied.
2.	The Draft PEIR unreasonably limits alternatives analysis leading to an inadequate treatment of potential alternatives that would attain most of the basic objects of the project but that which would lessen some of the negative environmental impacts associated with the medium and high-density alternatives. Specifically, no alternatives were analyzed that would have mitigate the parks deficiency, no alternatives were analyzed that would have increased mobility between the planned village and the Mid-Coast Trolley station, no alternatives were analyzed that addressed traffic impacts to the BASASP study area outside of the Transit Priority Zone, and no alternatives were analyzed that included eminent domain of a sliver

AN-1 The Balboa Avenue Station Area Specific Plan (BASASP) identifies several multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. The BASASP also includes a policy (Policy 3.1.4) to support the San Diego Association of Governments (SANDAG) and the San Diego Metropolitan Transit System (MTS) to consider a bicycle and pedestrian access via a connection across I-5 from the Balboa Avenue Trolley Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park and Mission Boulevard. Identification of funding sources and implementation of the facility would require further coordination by SANDAG and MTS. Without the connection, the walkshed (from the Balboa Avenue Trolley Station) would not be increased and remain as shown in PEIR Figure 5.15-1. This could potentially result in some additional traffic trips if people in the southern portion of the BASASP area choose to drive automobiles to access the trolley station; however, any additional trips would be negligible compared to the total trips generated by full implementation of the project and would not change the impact conclusions contained in the PEIR regarding traffic.

AN-2 In addition to the No Project Alternative: Adopted Community Plan and Medium Density Alternative that were evaluated in the PEIR, Section 10.4 in the PEIR identifies two other alternatives that were initially considered to reduce environmental impacts, including a Mobility Improvements Alternative and a Low Density Alternative. Descriptions of these alternatives and the reasons why they were not carried forward for further consideration is contained in Section 10.4.

AN-3 Please see Response AN-2 regarding alternatives included in the PEIR. The development of alternatives is based on the ability to avoid or minimize environmental effects while attaining most of the basic project objectives. No significant impacts were identified with respect to parks (please see Response AH-8) and mobility (please see Response AN-1) so alternatives focused on these issues were not considered.

COMMENTS

RESPONSES

*Karin Zirk comments (continued)**PROJECT No.: 586601 / SCH No. 2017071007, Page 2 of 6*

Comment Number	Comment
	of land between the Public Storage Facility and the Mossy Toyota for the community's preferred active transportation access point to the trolley station.
3.	As is currently written, the Draft PEIR does nothing to improve the community and both the medium and high density alternatives identify worse traffic conditions and decreased air quality from the No Project alternative.
4.	Given that the medium and high-density alternatives as well as the no project alternative rely on Rose Creek as a major mobility element, the apparent deliberate exclusion of Rose Creek from the Draft PEIR is very troubling. Why was Rose Creek excluded from the planning efforts? Why are improvements to bike paths, ingress/egress, and habitat to Rose Creek excluded from the BASAP? Are other planning efforts being undertaken separately to address the needs of Rose Creek to improve the mobility elements and/or the habitat?
5.	Furthermore, as the City is planning to destroy Rose Creek to build a water treatment plant in the area, this information should be disclosed in the Final PEIR, and all usage of Rose Creek as a connecting alternative for non-motorized traffic should be eliminated from the project.
6.	As a resident and homeowner in the BASAP area for over 14 years, I brought to many meetings the issue of traffic speeding through the residential neighborhood along Bond Street southbound to get to Grand Avenue and north bound to get to Garnet Avenue. Yet the Draft PEIR fails to analyze the impacts to traffic flow in the area by implementing traffic calming measures on this street. In the last two years, there have been numerous incidents of speeding that resulted in multiple parked cars being damaged, a car driving into the living room of a residence and cars driving into people's yards. As one of the community goals is to direct active transportation into this community, how can the city encourage vehicular traffic does not use this neighborhood as a shortcut? From a safety perspective, stop signs on Bond Street, speed bumps, and/or other traffic calming measures should be studied in the PEIR with regards to the impacts on traffic flow on Mission Bay Drive, Garnet Avenue, and Grand Avenue. In other words, what would the impacts be on traffic flow, if driving on Bond Street was slower than using Mission Bay Drive? With worse traffic conditions on Mission Bay Drive, Garnet Avenue, and Grand Avenue, what will be the additional traffic flow on Bond Street?
7.	Why was no traffic study done on Bond Street? This is a serious omission in the Draft PEIR as Bond Street is used by motorists to avoid congestion on Mission Bay Drive, Garnet Avenue, and Grand Avenue. As implementation of the medium or high-density alternatives will worsen traffic on the major arteries, more traffic will be diverted to Bond street. As Bond Street is outside the Transit Priority Area, the CEQA exemptions for a transit priority zone do not apply. Motorists heading south on Mission Bay Drive, turn west (right) on Magnolia and then south (left) on Bond Street. Motorist

AN-3 (cont.)

The Medium Density Alternative would reduce (but not avoid) traffic impacts. The recommended alternative about property acquisition is also not warranted because there is no associated significant impact.

AN-4

The BASASP identifies several multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station and to encourage walking, bicycling, and using transit. Traffic and air quality impacts would be slighter greater compared to the No Project Alternative because there would be more daily traffic trips associated with the increased densities, although there would be some automobile trip reductions and associated air emissions due to the proximity and availability of transit facilities.

AN-5

The BASASP includes only a small portion Rose Creek within Pacific Beach, which includes the area west of Interstate 5, north of Damon Avenue, and east of Mission Bay Drive. Please see the Balboa Avenue Station Area Specific Plan Public Comment Summary memo regarding comments related to Rose Creek.

AN-6

The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Existing and future planned bicycle and pedestrian facilities along Rose Creek would not be affected by this project or other reasonably foreseeable projects. There are no City plans to build a water treatment plant in the vicinity of Rose Creek.

AN-7

The BASASP includes a bicycle boulevard along Magnolia Avenue. This facility would include traffic calming measures at the intersection of Magnolia Avenue and Bond Street.

AN-8

The study area for traffic analysis for the BASASP was established using the classified roadways within the respective community.

COMMENTS

RESPONSES

*Karin Zirk comments (continued)**PROJECT No.: 586601 / SCH No. 2017071007, Page 3 of 6*AN-8
(cont.)

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AN-14

Comment Number	Comment
	heading west on Grand, turn right onto Bond Street heading north, often at high speeds. What is the volume of traffic and the average speeds currently and what is the projected volume of traffic and average speeds under the medium and high-density alternatives? How will traffic-calming measures on Bond Street increase bicyclist and pedestrian usage of traveling through the neighborhood to and from the trolley station?
8.	How will the designation of Magnolia Avenue as bicycle boulevard be implemented if traffic-calming measures on Bond Street are not undertaken so that bicyclists have safe crossing of Bond? How will the designation of Magnolia Avenue as a bicycle boulevard function if Rose Creek is turned into a water treatment plant as planned by the City of San Diego's Transportation and Stormwater Department?
9.	According to Table 5.1-6: Land Use And Community Planning Element Policies Related To Balanced Communities, item LU-H.1.1, subitem e, the project should "Provide affordable housing opportunities within the community to help offset the displacement of the existing population."
10.	Has a survey of the income levels of the people living in the Pacific Beach portion of the BASASP been conducted and if so what are the results of that survey? How does the new zoning propose to accommodate at least the number of low and medium income rental units that currently exist? How will this plan insure that future housing in the area will comprise an equal or greater number of units as currently exists for low and medium income housing? Will affordable housing be permanent affordable housing or will developers be allowed to offer a percentage of affordable housing for a short period?
11.	In Section 5.3, page 5.3-31, under Litter/Trash and Materials storage, Priority I, Item 1, indicates the City will provide and maintain trashcans and bins at trail access points as well as removing litter and trash on a regular basis. What is the timeline for implementation of and the funding source for these trashcans? Please provide a more thorough explanation of what "remove litter and trash on a regular basis" means. Is that weekly, monthly, quarterly, annually or less frequently? How will the need to remove trash be identified by the responsible City departments? Will trashcans be provided throughout the BASASP planning area or only at access points to Rose Creek? Will dog poop bags be provided at trail access points to encourage dog walkers to pick up their dog poop instead of letting it fall into Rose Creek and eventually Mission Bay Park?
12.	Currently volunteers pick up almost 4 tons of trash and recyclables per year out of Rose Creek from the Mike Gotch Bridge to I-5. With 4 times the residents, that would be an average of 16 tons of trash per year if trash is generated at the same rate. How will the City of San Diego address this amount of trash?
13.	In Item 5.6.2.3 Regional San Diego Association of Government's San Diego Forward: The Regional Plan goals are to

AN-8 (cont.)

Connections and setting for bicyclists and pedestrians were considered in the proposed network. The resulting bicycle boulevard facility along Magnolia Avenue includes traffic calming measures that would aim to reduce vehicle speeds to encourage a lower stress bicycle and pedestrian experience.

AN-9

A bicycle boulevard facility includes traffic calming measures at intersections. Existing and future planned bicycle and pedestrian facilities along Rose Creek would not be affected by other reasonably foreseeable projects.

AN-10

The BASASP proposes to increase the capacity for new housing within the area by approximately 3,500 units as compared to the adopted Pacific Beach Community Plan. The range of densities within the BASASP area presents an opportunity to provide a range of housing opportunities, types, and affordability levels. Additionally, all properties are subject to the City's affordable housing requirements as outlined in the Inclusionary Housing Ordinance. The BASASP contains specific policies to provide a diversity of housing types and affordable housing." For example, Policy 2.1.5 states, "Support diverse, balanced, and affordable housing." Policy 2.1.8 states, "Encourage the development of affordable and senior housing units at different income levels."

AN-11

Please see Response AN-10.

AN-12

The referenced PEIR section lists management directives for MHPA lands. While MHPA lands occur within the BASASP area, none would be impacted by the implementation of the BASASP unless (as stated in Section 5.3.8.2 of the PEIR) impacts occur to those previously developed areas within the MHPA whereupon a MHPA Boundary Line Correction could be processed. Accordingly, the proposed BASASP and subsequent future development under the BASASP would not be required to implement this management directive.

COMMENTS

RESPONSES

*Karin Zirk comments (continued)**PROJECT No.: 586601 / SCH No. 2017071007, Page 4 of 6*AN-14
(cont.)

AN-15

AN-16

AN-17

AN-18

AN-19

Comment Number	Comment
	<ul style="list-style-type: none"> • Create walkable neighborhoods. • Foster distinctive, attractive communities with a strong sense of place. • Preserve open space, natural beauty, and critical environmental areas.
14.	How will the City of San Diego preserve Rose Creek as open space if the City of San Diego Stormwater and Transportation department is planning on building a water treatment plant on top of the creek?
15.	In regards to Section 5.16 Visual Effects and Neighborhood Character: the unique character of this neighborhood is Rose Creek and the Kumeyaay ethnohistory in this area. The City of San Diego Urban Design guidelines for the Villages are supposed to include a sense of place. How will this unique place in space and history be addressed in the final PEIR to insure that this neighborhood has a sense of place?
16.	In section 5.5, a high liquefaction risk is identified with the majority of the BASASP. While the BASASP does identify building requirements that mitigate this risk, how will affordable housing be created with the additional expenses incurred to build or remodel properties in this area?
17.	On page 5.6-19, Strategy 5, Climate Resiliency, of the Climate Action Plan calls for further analysis of the resiliency issues that face the various areas of the City. Resiliency is addressed throughout the BASASP as it pertains to water usage, energy efficiency, and sustainable development practices as noted above. Also included within the BASASP are policies supporting and encouraging an increase in the tree canopy within the community to reduce summer heat temperatures, increase absorption of pollutants and carbon dioxide, and contribute to a more inviting atmosphere for pedestrians. However, addressing sea level rise is not addressed. What portion of the BASASP will be underwater due to sea level rise in 50 years? How will protecting the Rose Creek wetlands contribute to climate resiliency? I strongly urge the City of San Diego to identify natural strategies for climate adaptation that protect Rose Creek and the surrounding community and to incorporate these strategies into the community plan amendment.
18.	Regarding Table 5.2-5 -- Adopted Community Plans And Proposed BASASP Buildout Land Uses. I understand and support the high-level goals of the City of Villages. However, I have specific concerns that are not being addressed. Land Use Element I.U.-A.8 indicates that the planning efforts should be determined "at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses." Therefore, I feel it is 100% appropriate for the BASASP to identify commercial use and other appropriate uses. To this end, public storage facilities do not contribute to a desirable neighborhood and should be removed from the zoning plan, as this is the single largest land use in the area. Why was the footprint of

AN-13 As discussed in Section 5.14.6 of the PEIR, future development projects would be subject to compliance with applicable waste management requirements and City ordinances. Projects that would exceed established thresholds of solid waste are required by the City to prepare and implement a Waste Management Plan that targets a 75 percent waste reduction. Future project would also be required to comply with applicable water quality regulations.

AN-14 As discussed in Section 5.1.4.1 of the PEIR, the proposed BASASP would be consistent with goals of San Diego Forward: The Regional Plan to focus growth in urbanized areas and to connect communities with transit. The BASASP does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area.

AN-15 Please see Response AN-6.

AN-16 The BASASP includes policies in the Urban Design chapter that reflect Rose Creek as an important attribute within the community. Similarly, the BASASP contains Urban Design policies related to enhancements of gateways and the public realm. Enhancements could include treatments that integrate art or cultural amenities.

AN-17 Section 5.5, *Geology and Soils*, of the PEIR includes discussions of seismic-related fault rupture, ground-shaking and -lurching, seismic settlement, and geologic stability. The analysis, based on a geotechnical study (Appendix D to the PEIR), concluded that with conformance to applicable regulatory/industry standard and codes, impacts would be less than significant, and no mitigation is required. It is not anticipated that special construction techniques or activities will be required for future development projects. Thus, no associated costs would be borne by future homeowners. Please see Response AN-10 regarding affordable housing.

COMMENTS

RESPONSES

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AN-18 As discussed in Section 5.6.5.1 of the PEIR, the proposed BASASP consistent with the City's Climate Action Plan and contains goals and objectives that implement all of the five primary CAP strategies, including the noted Climate Resiliency. These CAP strategies are aimed at reducing greenhouse gas emissions and account for (among other factors) potential sea level rise effects.

AN-19 Although Moving & Storage Facilities are not permitted uses in the proposed commercial zones (CC-3-8 and CC-3-9), the Future Build Out Assumptions assumed the existing self storage facility would remain given the current and projected market demand for this use.

COMMENTS

RESPONSES

Karin Zirk comments (continued)

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AN-19
(cont.)

AN-20

AN-21

AN-22

AN-23

Comment Number	Comment
	public storage facilities maintained in a transit priority area? How are public storage facilities utilized by transit when MTS limits the amount of belongings a person is allowed to transport via public transit?
19.	What strategies will be implemented to include critical residential services such as a grocery store and pharmacy in the village? A food desert is a community without access to healthy affordable fresh fruits and vegetables. According to a 2016 article in the San Diego Union Tribune (http://www.sandiegouniontribune.com/news/data-watch/sdut-san-diego-food-deserts-2016may15-htmlstory.html) a food desert exists where the grocery store is a mile away. The BASASP planning area is a food desert. Therefore, I think zoning for multi-use is not sufficient. While I understand the City of San Diego cannot force a grocery store to locate in the planning area, what zoning designations would give preference to a moderate sized grocery store and how can the City include such zoning in the BASASP?
20.	Visitor Accommodations currently exist in the BASASP area and are critically important given the proximity to Mission Bay Park and the east of access to the beach. The accommodations in this area are affordable to a wide range of incomes and provide accommodations not available at similar price points in Pacific Beach. I feel that any downzoning of these businesses would limit affordable visitor accommodations in the coastal zone. Furthermore, as these business will be in the Transit Priority Zone, visitors to San Diego will not need a vehicle to access them from the intercity train station, bus depot, and/or airport. Furthermore, they will be able to visit many of San Diego's tourist attractions without need a car. Zoning for visitor accommodations should remain.
21.	Pacific Beach has a highly educated workforce and insuring additional zoning focused on light industrial and office space in the area south of Balboa between I-5 and the alley between Revere and Del Rey Streets as well as where such buildings currently exist would be a suitable location for additional employment centers for the community. Most businesses that are more than startups require facilities such as the San Diego Science Center, that rents specialized laboratory space for biotech Research and Development. These are quality jobs for the Pacific Beach and Clairemont communities and are preferred to a coffee shop or restaurant that commonly appear on the ground floor of mixed used developments with housing above and does not provide compensation at the level that would allow someone to live and work in the same community. Please retain the designated commercial zone for these successfully businesses.
22.	The Draft PEIR downplays the risks for residential use of land adjacent to freeways per the Air Quality Control Board study of 2005 (see https://www.arb.ca.gov/ch/handbook.pdf). If the zoning is changed, how will sensitive populations be informed of the health risks of residing in a poor air quality zone? The current commercial

AN-20 Grocery stores are permitted within the proposed commercial (CC-3-8, CC-3-9, CC-4-5, and CO-1-2) and residential zones (RM-3-8 and RM-4-10) within the BASASP area, in accordance with Tables 131-05B and 131-04B in the City's Municipal Code. See PEIR Figure 3-2 for the locations of these proposed zone classifications.

AN-21 Visitor Accommodations are permitted within the proposed commercial zones (CC-3-8 and CC-3-9) and residential zones (RM-4-10) within the areas proposed to be designated Community Village within the BASASP area, in accordance with Tables 131-05B and 131-04B in the City's Municipal Code. See PEIR Figure 3-2 for the locations of these proposed zone classifications.

AN-22 This comment recommends the retention of existing commercial zone designation for a specific location within the BASASP area but does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.

AN-23 As stated in Section 5.2.7.1 of the PEIR, the siting distances recommended by the California Air Resources Board (CARB) that are identified in Table 5.2-8 of the PEIR are advisory and are not required buffer zones for new development. These will be considered as part of the project-specific approval process associated with future development proposals within the BASASP area. The specified areas in the comment are proposed as part of the areas designated as Community Village (see PEIR Figure 3-1). Greenhouse gas (GHG) emissions are analyzed in Section 5.6 of the PEIR. Table 5.6-7 summarizes annual GHG emissions associated with buildout of the adopted Community Plans (Pacific Beach and Clairemont) and the proposed BASASP.

AN-23
(cont.)

Karin Zirk comments (continued)

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	zoning for all properties adjacent to I-5 is the appropriate zoning. Mixed Use Residential zoning should be moved to the area between Revere Street and Mission Bay Drive, and in the currently commercially zoned area on the west side of Mission Bay Drive. Living in San Diego is about being able to use the ocean breezes to cool your home. How much additional greenhouse gas emissions will be created by people living in a home that requires all the doors/windows to be shut and air conditioning to be running to avoid the air pollution?

I look forward to working with the City of San Diego to create a village that balances density, open space, visitor services, and stores to serve residents with easy and safe access to the Balboa Avenue Station Trolley Station and Pacific Beach's beaches and bays.

Regards,



Karin Zirk, Ph.D.
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MEMORANDUM

DATE: June 12, 2018

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TO: Rebecca Malone, Environmental Planner
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SENT: Via email to: PlanningCEQA@sandiego.gov

Re: Balboa Avenue Station Area Specific Plan /PROJECT No.: 586601 / SCH
No. 2017071007

COMMENTS ON PROPOSED PROJECT**Introduction**

Through these comments the undersigned request the City Council reject the Program Environmental Impact Report (PEIR) for the Balboa Avenue Station Area Specific Plan (interchangeably referred to throughout this memo as the "BASASP" or "proposed project").

The City of San Diego has prepared the BASASP and related PEIR, and made them available for public comment. Unfortunately, although the effort put into creating the BASASP and PEIR has

AO-1

AO-1 The comment includes introductory statements and makes a general statement about the Balboa Avenue Station Specific Plan (BASASP) and the Program Environmental Impact Report (PEIR) lacking specificity and also identifies the issues raised in subsequent comments. See responses AO-2 through AR-14, which address specific comments relative to these issues.

AO-1
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obviously been tremendous, they are drawn in such a remarkably overbroad and vague fashion the public is unable to comprehend the specifics of the BASASP and PEIR well enough to make pointed, meaningful comment. Moreover, the impact on the Mission Bay, Pacific Beach, and Clairemont communities has not been adequately considered or accommodated.

The City has presented a pretty picture of a happy, perhaps utopian, new commercial/residential development plan in one of the most traffic burdened and heavily populated areas in the City of San Diego. There are descriptions of paseos and bike paths, outdoor dining and concealed parking, and up to 4,279 residential units, in an exciting "transit-oriented" village that is to be a part of the City's General Plan City of Villages strategy." PEIR, p. 1-1. But, as pretty a picture as the BASASP and PEIR paint, they are inexact, whimsical, and out-of-focus, and they blithely ignore the realities of local plans, as well as Mission Bay/Pacific Beach/Clairemont living and traffic demands.

AO-2

In addition, the comment period – although lengthened somewhat at the request of the Clairemont Planning Group – was far too short to allow meaningful review of the 570 plus pages of project description and hundreds – if not thousands – of additional pages of supporting reports identified as appendices. All of these documents must be reviewed – and compared with multiple related local and coastal area plans – to ensure comprehensive analysis of the project. The brief statutory minimum comment period was far too short to allow such meaningful review.

AO-3

I. General Land Use Considerations: The Proposed Development is Fundamentally Flawed and Conflicts with Sensible Sustainable Growth Principles

A. The Program is not in line with the City of Villages Strategy

In theory the PEIR proposes a transit-oriented development in line with San Diego's City of Villages strategy. San Diego formulated the City of Villages strategy in 2002 and included the strategy in the City's 2008 General Plan. The Strategy Framework defines a "village" as the "mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated. Each village will be unique to the community in which it is located.

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AO-2 The public review process of the Draft PEIR was conducted in accordance with the requirements of the California Environmental Quality Act (CEQA), pursuant to CEQA Guidelines Sections 15087 and 15105. The City also extended the required 45-day public review period an additional 14 days in response to a request made by the Clairemont Community Planning Group to allow for additional time to review the Draft PEIR and provide comments.

AO-3 The proposed BASASP would establish a transit-oriented Community Village in accordance with the definition of "village" per the General Plan Strategic Framework. The comment cites only a partial definition of village. The other components (as stated in the Strategic Framework) include:

All villages will be pedestrian-friendly and characterized by inviting, accessible and attractive streets and public spaces. Public spaces will vary from village to village, consisting of well-designed public parks or plazas that bring people together. Individual villages will offer a variety of housing types affordable for people with different incomes and needs. Over time, villages will connect to each other via an expanded regional transit system.

The BASASP designates higher density mixed-used residential and commercial uses in close proximity to transit facilities with multi-modal facilities providing connectivity between the proposed uses and transit facilities.

COMMENTS

RESPONSES

AO-3
(cont.)

Strategic Framework, City of San Diego General Plan (March 2008), page SF-3. The BASASP – even if developed as proposed – unfortunately does not qualify as a village under this definition. Although the project is nominally aimed at mixed-use development, it significantly reduces commercial land use (and even rezones as residential the land currently occupied by automobile dealerships, a motel, a health club and an industrial park). Neither is the project aimed at creating meaningful employment or civic land uses. Rather it is almost exclusively focused on the development of high density housing.

AO-4

The City of Villages strategy is intended to build on the strengths of San Diego's existing communities, but it also contemplates the creation of "transit corridors" – with new pedestrian-friendly developments characterized by inviting, accessible and attractive streets and public spaces. The PEIR is aimed at creating this latter sort of village. The PEIR does not, however, put forth an actual development proposal, but is rather aspirational, envisioning a project in-line with the City's stated goal of increasing housing density infill development. If approved, it appears any developer would be able to rely on the zoning density provided for under the BASASP (and environmental review would be minimal if required at all), but piece-meal development would be possible, ensuring that the less financially feasible aspects of the overall project would founder. Housing density would increase, but the idyllic vision of a mixed use community would not be achieved because rather than a development at the heart of the community, the increased housing would simply create a new urban problem—an "infillurb" divorced from the city center and commercial opportunities – whose residents largely rely on their automobiles for transportation. The proposed "village" thus falls short of the villages envisioned in the City of Villages strategy. It does not represent the revitalization of an existing community or neighborhood with pre-existing cultural and community interest, or an area at the heart of either Pacific Beach or Clairemont, but is just another development project.

AO-5

While purportedly aimed at "transit oriented development," as envisioned this project would dramatically increase the number of cars entering and exiting the freeway in an already heavily

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Page 3

AO-4

The proposed BASASP is a Specific Plan that proposes to re-designate and rezone lands to encourage and allow for public and private transit-orientated development in the vicinity of the approved trolley station. The BASASP does not include specific development proposals but provides the policy framework and land use controls to guide future development within the BASASP area. On a similar note, the PEIR is a program EIR in that it addresses the overall implementation of the BASASP and not any specific development proposal as explained in Section 1.3.1 of the PEIR. The PEIR was prepared in accordance with the CEQA Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000 et seq.). The conclusions and supporting analysis contained in the PEIR are supported by substantial evidence contained in the record. Impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, the PEIR identifies mitigation measures that would avoid or reduce impacts and discloses where impacts cannot be mitigated to less than significant.

As discussed in Response AO-3, the proposed project would meet the definition of a Village, as defined in the General Plan Strategic Framework.

AO-5

The BASASP identifies several multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station and to encourage walking, bicycling, and using transit. Please see Response B-1 regarding traffic impacts and proposed densities.

AO-5
(cont.)

impacted traffic corridor. The BASASP would make the trolley accessible for those who live within walking distance (with the caveat that the lack of a pedestrian bridge indicates those living in the proposed village would have a long walk to the trolley) — but would only complicate transport for residents living within a five to ten minute drive from the station. Census data indicates eighty percent of residents living within walking distance of the trolley do not take the trolley to work, but instead continue to rely on automobiles. The increased traffic and decreased parking would make it much harder for the larger number of residents in the surrounding area to use the trolley. SANDAG's January 31, 2017 Mobility Hub Presentation for the Draft PEIR estimates that 32,600 residents live within a five minute drive of the trolley station. This is the potential ridership the City should target. But increased traffic in the area would effectively preclude those residents from convenient access to the trolley. It is not uncommon to wait ten minutes to get through the Balboa intersections near the trolley during peak traffic times; increased housing density would only worsen the congestion (as discussed below).

AO-6

The more than 4,000 additional housing units proposed in the PEIR would severely interfere with transportation mobility in an already heavily impacted transit corridor. The undersigned are concerned that the project would interfere with other equally important goals stated in San Diego's General Plan, and conflicts with the general plans of the adjoining communities of Pacific Beach and Clairemont. Instead of focusing on increasing housing near the trolley, the City should focus on increasing transportation options for the many thousands of residents who live near enough to the trolley to transfer from a bus route. This alternative would lessen traffic in the trolley zone and could be combined with redevelopment of the commercial areas near the trolley and revitalization of the historic centres of the adjacent communities. The long term goal of the City of Villages strategy envisions that over time, villages will connect to each other via an expanded regional transit system. The alternative approach would enable fruition of this ideal.

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AO-6 The comment states that the proposed project would interfere with General Plan goals and conflict with the Pacific Beach and Clairemont Community plans but does not provide examples or supporting information. Section 5.1.4.1 of the PEIR includes detailed analyses of how the proposed project would be consistent with the General Plan and both the Pacific Beach and Clairemont Mesa Community Plans. Regarding access to local bus routes, Section 5.15.4.1 of the PEIR identifies that two existing bus routes serve the area (Route 27 along Balboa Avenue and Garnet Avenue and Route 30 along Grand Avenue) and that the proposed multi-modal improvements recommended in the BASASP would facilitate connections to existing and planned transit facilities in the area.

B. The project conflicts with Pacific Beach's General Plan and the interests of many Pacific Beach residents

The Pacific Beach Community Plan was adopted on December 2, 1993 and approved by the City Council on February 28, 1995. Pacific Beach's general plan has two components that are particularly relevant to this plan. First, Pacific Beach has embraced a goal of offering a diverse economic and employment base in the Pacific Beach industrial area, and sought to achieve this in part by rezoning some existing industrial space to allow light manufacturing and small industry in these areas.

Currently only twelve percent of Pacific Beach's land is dedicated to commercial and/or industrial use; but the BASASP would reduce this amount. Rather than complaining about a lack of housing in Pacific Beach, Pacific Beach's residents complain of a lack of services and businesses, and the need to leave Pacific Beach for shopping and employment. Pacific Beach's general plan indicates the need to rehabilitate older commercial zones, but does not suggest they be done away with. The Pacific Beach plan further indicates revitalization of existing commercial districts and retention of industrially-zoned areas are consistent with San Diego's General Plan and would foster the balanced economy Pacific Beach residents want. By contrast the BASASP rezones commercial land to high-density residential development.

The current Pacific Beach plan states that 88 percent of Pacific Beach's acreage is devoted to residential development, with 61 percent designated for single family use and 39 percent for multi-family use. So, contrary to the BASASP description, Pacific Beach already has a high percentage of its land dedicated to multi-family housing. In addition to taking away much needed commercial land, the BASASP would rezone the land currently occupied by 87 single family units to high density multi-family dwelling units.. (It is unclear if these homes would be subject to taking by eminent domain as a result of approval of the PEIR.)

The BASASP proposes residential density as high as 109 units/acre; this density could increase substantially with the density bonuses available for developers who include moderate

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AO-7 The underlying zone classifications of the areas proposed to be designated Community Village would be commercial zones that could support both commercial and high density residential uses. It is acknowledged that displacement of some existing uses, including residential land uses, could be removed through implementation of the BASASP. Per Table 5.1-1 in the PEIR, there are a total of 91 existing single-family residential units and 672 existing multi-family residential units within the BASASP. Table 5.2-5 of the PEIR identifies the land use assumptions used in the analysis of the proposed project at buildout and notes that 672 existing multi-family residential and 2 existing single-family residential units would remain under buildout conditions of the BASASP. Thus, full implementation of the BASASP could potentially remove up to 89 single-family residential units, but the existing multi-family units would remain. The BASASP contains specific policies to provide a diversity of housing types and affordable housing. Redevelopment would occur through future development proposals on a project-by-project basis; individual proposals that would remove existing homes would be required to go through applicable real estate/acquisition processes.

AO-8 Please see Response AE-3 with regard to density bonuses. As identified in Section 3.6.1 of the PEIR, a Community Plan Amendment to the Pacific Beach Community Plan is proposed as part of the project to change the land use designations and associated proposed densities.

AO-8
(cont.)

income housing in their developments (density bonuses are available for units aimed at relatively affluent demographics whose incomes are less than or equal to 150% of the area median income (AMI – for San Diego the AMI was \$81,800). By comparison, most low income housing incentive programs target individuals earning 30 – 80% of AMI, not amounts in excess of AMI.

Pacific Beach's general plan by contrast, provides that medium-high density, consisting of 30 – <40 units/acre is the highest density category for residential development allowed in Pacific Beach. The BASASP completely ignores the community's stated goal to allow at most medium-high density (a fraction of the density proposed by the BASASP).

The levels of density proposed in the BASASP are in sharp contrast with the proposed project. This is particularly troubling as the Pacific Beach community was inconsistently advised as to the existence of the BASASP and the dates for public review. The Pacific Beach page on San Diego's website indicates an erroneous and long past due date for comments to the proposed project.¹ Pacific Beach planners may have acceded to the Plan, but it is likely many Pacific Beach residents would not.

C. The Project Conflicts with Clairemont's General Plan

Clairemont is currently in the process of updating its general plan. This project, which appears to be presented as a foregone conclusion, will no doubt form a significant component of the plan – but that is getting it backwards. Clairemont should be able to adopt a revised plan without this project being crammed down on it as a fait accompli, particularly as it is not clear that developers will appear or that financing will be available to bring the project to fruition.

The current Clairemont Plan specifically embraces as its first enumerated community issue

¹ As of June 11th, the Pacific Beach profile page on the City of San Diego's website requested comments on the Draft Specific Plan (for the Balboa Station Area Plan be submitted by Friday, January 26th, 2018, and nowhere indicated the comment period ending as of June 12th 2018. The Plan available at the link on that webpage was, however, to an April 2018 draft document. This erroneous public notice fails to comply with CEQA. A screenshot of the website is attached hereto as Ex. 1; see also <https://www.sandiego.gov/planning/community/profiles/pacificbeach>

AO-9 Proposed changes in land use and density would occur only to areas within the Pacific Beach Community Plan area. Land areas within the BASASP boundaries that are located in the Clairemont Mesa Community Plan area are limited to industrial and commercial uses, as well as the Balboa Avenue Trolley Station that is being implemented as part of the Mid-Coast Transit Corridor Project. The existing industrial and commercial uses and the Trolley Station (once built) would not change with implementation of the BASASP.

“the desire to preserve the low-density, single-family character of the community.” Clairemont Plan, page 5. Clearly this goal conflicts sharply with the increased housing proposed by the BASASP, although the increased housing is largely in the adjacent community of Pacific Beach.

Other community issues are in direct conflict with the proposed development, namely:

- 6. The need for redevelopment of the industrial uses along Santa Fe Street and portions of Morena Boulevard
- 8. The need to improve public transportation
- 9. The need to reduce traffic congestion along Balboa Avenue
- 10. The need to eliminate present and prevent future contamination of Tecolote Creek and Rose Creek by urban pollutants, (i.e., sewage, industrial chemicals) and to reduce and prevent siltation.

Clairemont General Plan, page 5.

Specifically, Clairemont has embraced “slow growth” — rejecting both maximum and no growth. Slow Growth was selected because it would protect canyon lands and vacant areas from development, and would not allow significant increases to existing commercial lands. The proposed development is thus incompatible with Clairemont’s current plan and the City should not force this project on Clairemont without giving Clairemont the opportunity to develop its own strategy for development. The timing of the BASASP is particularly offensive as the trolley is not scheduled to begin operations until 2021. Clairemont residents should have the opportunity to use the trolley and demonstrate its value to the larger community before a large housing development is planned: the PEIR is thus premature.

D. The Project would interfere with valuable Open Spaces

The proposed project conflicts with other land use components of the general plans of San Diego and the adjacent communities. The City of Villages strategy recognizes the value of San Diego’s open spaces. The proposed project is near the Mission Bay Park and includes the Rose Creek watershed area. Mission Bay Park is one of the most heavily used recreation areas in the city. Parking is already difficult on summer weekends; access to the Bay via the trolley could be

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AO-10 The proposed BASASP would not impact the portion of Rose Creek that is within the BASASP boundaries or Mission Bay Park. Future development proposals in the southern portion of the BASASP area would be subject to applicable development regulations of proposed zone classifications and a 30-foot building height due to this area being located within the Coastal Zone. Additionally, as discussed in Section 5.16.4 of the PEIR, the proposed BASASP would not substantially alter or block public views from public viewing area within the BASASP area.

The BASASP does not propose any changes to land use within Rose Creek. The portion of Rose Creek within the BASASP boundaries would remain designated open space. This would not preclude restoration of any reach of Rose Creek (either within or outside of the BASASP boundaries) or adversely affect biological resources within Rose Creek.

As discussed in Section 5.3 of the PEIR, the proposed project would avoid impacts to wetlands, including Rose Creek and all impacts to sensitive habitat that would occur during future development proposals would be mitigated in accordance with applicable regulations (e.g., the City’s Multiple Species Conservation Program Subarea Plan, City’s Biology Guidelines) with agency oversight, as applicable. Thus, the suggested restoration alternative is not warranted.

AO-10
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beneficial for residents throughout San Diego. But a large development on the edges of the Mission Bay Park would certainly interfere with the aesthetics of the area, crowd resources, and may conflict with coastal zoning regulations.

Rose Creek is another valuable open space in the area, and has long been in need of rehabilitation and expansion so that the larger watershed plain is protected. The PEIR reserves only a tiny strip of the Rose Creek watershed, and the project would permanently prevent restoration of the larger Rose Creek watershed and would interfere with all of the species inhabiting its unique ecosystem. Moreover, the PEIR is deficient because it does not include an alternative that would provide for restoration of the area.

II. The Project Would Interfere with the Important Goal of Improving Transportation in the Area.

The BASASP attempts to achieve one of the goals of the City's general plan – increased housing density and infill development – but would severely undermine the equally important goal of improving transportation and mobility in the area.

A. The Project would Increase Automobile Traffic

The BASASP proposes new high density residential and commercial development at the junction of the Mission Bay, Pacific Beach, and Claremont communities, and in one of the most heavily travelled and congested traffic zones in the entire City of San Diego. Currently, Balboa Avenue – in the area of the BASASP – is clogged for two-to-three hours every weekday morning and weekday evening. Building another 4,000 dwelling units in the immediate vicinity will have the certain effect of adding thousands of additional vehicles to the morning and evening traffic crunches that already consume hours of Claremont and Mission Beach commuters' travel time every work week. On top of the new residents and their contribution to heavier traffic conditions, the BASASP is designed around the new Balboa Avenue Station and its anticipated 3,180 daily passenger "boardings" (and presumably 3,180 un-boardings). The Balboa Avenue Station, however, will have

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AO-11 Please see Response B-1 with regards to traffic and density.

AO-11

AO-11
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only 238 parking spaces, and while many passengers will be walking or bicycling to the Station to catch the trolley, at least a couple of thousand vehicles will need to drive in, then out of the station two-times per day. In other words, 2,000 in for a passenger drop-off, then 2,000 out, then 2,000 in for a passenger pick-up, then 2,000 out, equals an additional 8,000 vehicles trips into Balboa's/Garnet's already over-burdened traffic situation. If local residents are to benefit from the Balboa Avenue Station, ready and uncluttered access to the trolley stop is crucial, but the access and traffic complications presented by the BASASP would seem more to complicate than simplify transportation and quality of life issues for Mission Bay, Pacific Beach, and Claremont residents.

Currently about 84 percent of residents citywide drive to work, according to data from the U.S. Census Bureau — more than ten times the number who take public transit, walk or bike (about 8 percent). Most of the remaining people work from home or commute by taxi. In its effort to increase the number of people who live in a transit corridor and take the trolley, the BASASP essentially ignores the needs and practices of the bulk of the city's workers. The BASASP shows its naivete by presenting an impractical plan to throw 4,000 residential dwelling units into the BASASP area. While the BASASP may provide a new trolley stop, and a significant new commuter option, it will bring a new measure of commuter misery on the vast majority of Claremont and Pacific Beach locals.

The city's climate plan calls for 22 percent of all commuters in transit corridors — those who live within a half-mile of a major transit stop — to bike, walk or take public transportation to work by 2020 and envisions this percentage increasing to a whopping 50 percent by 2035.² That would represent more than 241,200 people of the city's total workforce by that time. The BASASP, however, does little to meet the needs of current commuters, rather it is hoping to bring in new "transit oriented" commuters intending to fill the trolley.

² Union Tribune, August 28, 2016.

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AO-11
(cont.)

The San Diego General Plan is hoping to gently move San Diegans toward efficient, less-polluting transportation by embracing a “strategy for relieving congestion and increasing transportation choices in a manner that strengthens the City of Villages land use vision.” Taken together, these policies advance a strategy for relieving congestion and increasing transportation choices in a manner that strengthens the City of Villages land use vision.

As further explained in the General Plan,

A balanced network is one in which each mode, or type of transportation, is able to contribute to an efficient network of services meeting varied user needs. For example, the element contains policies that will help walking become more attractive for short trips, and for transit to more effectively link often visited destinations, while still preserving auto-mobility.

San Diego General Plan, SF-10.

The traffic created by each of the Balboa Avenue Station and the high-density residential development will certainly increase, rather than relieve, congestion. Something needs to give, because the added burden on commuters and local communities is simply too great.

B. Bicycle Traffic would be Less Safe and Exacerbate Automobile Traffic

The BASASP and PEIR nobly remind that traffic patterns in the Balboa Avenue Station Area need to be adjusted, and current and increasing bicycle traffic must be accommodated. The I-5/Balboa/Garnet interchange, along with the surface streets that feed the area, makes up perhaps the most complex and confusing, and heavily trafficked zone in the City of San Diego. Into this chronic traffic snarl, however, there will soon be added another 8,000 vehicle trips per day as a result of the new trolley station planned for that triangle of land west of I-5 and south of Balboa Avenue – see calculation above. Into this traffic mess every day ride hundreds and sometimes thousands of bicyclists. The BASASP provides a number of proposals intending to meet the needs of the bicyclists, but the proposals are inadequate to the demands of both commuting and touring bicyclists. As just one example, the BASASP describes that “a Class III facility is a bike route that provides for a shared use with motor vehicle traffic and is only identified by signage and/or pavement markings.”

Comments on Draft Program EIR
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Balboa Avenue Station Area Specific Plan

AO-12 The proposed BASASP would provide bicycle improvements that are identified in Section 3.3 of the BASASP and include a variety of facilities within the area for bicyclists of different abilities. While the proposed BASASP would include a Class III bike route along Garnet Avenue between Mission Bay Drive and Santa Fe Street, it would not replace an existing vehicular travel lane. A separate shared use path is also provided parallel to Garnet Avenue. Proposed bicycle facilities would be subject to compliance with design standards to provide adequate and safe facilities. The BASASP also contains policies aimed to protect people riding bicycles.

AO-12
(cont.)

These Class III bike routes have turned into an invitation for conflict between bicyclist who exercise their right to use the shared lane and the vehicle operator who doesn't like a bicycle taking over a full lane of traffic on a heavily-travelled two lane road. They are a frustrating and dangerous mess.

The central artery between Clairemont and I-5 northbound, I-5 southbound, Mission Bay, Mission Beach, and Pacific Beach is the Balboa/Garnet I-5 underpass. It is a challenge that causes huge delays between the hours of 6 a.m. and 7:30 p.m. weekdays, and during most weekend daylight hours (certainly during the summers, when non-commuting bicycle traffic is heaviest). The BASASP proposes taking one of the westbound underpass lanes and converting it into a Class III bike route all the way west to the street that feeds the northbound I-5 onramp. See BASASP Figure 5.15-7. While the undersigned are not experts in traffic management, including flow and safety, a Class III bike route in this location is going to complicate and slow vehicle traffic, and will directly and adversely affect the safety of bicyclists – whether while working their way through a commute or trying to enjoy a safe trip to the beach or a shop.

Clearly planners are aware of the traffic problems created by the southbound and northbound I-5 onramps from Balboa and Garnet Avenues. Page 3-14 of the BASASP indicates that the plan intends to “support the modification of the I-5 northbound Ramp to a dual right-turn only with signal control at Balboa Avenue.” It is not clear, however, how the plan accommodates the Class III bike route with light-controlled dual right turn lanes. This issue is of great consequence to both the incredible vehicle traffic in the area, and the safety of bicyclists invited to share the number two westbound lane with passenger- and commercial-vehicle traffic. This confusion, and the cavalier approach taken to bicyclist safety is a further indication that this plan is solely focused on increasing housing – and not on the myriad other needs of local residents.

The City needs to take a more serious and practical look at how to meet the travel and safety needs of the residential and touring bicycling populations of Mission Bay, Pacific Beach, and Clairemont.

Comments on Draft Program EIR
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Balboa Avenue Station Area Specific Plan

AO-13

III. Air Quality

The significance of pollutants created by the proposed project should be weighed against the severe air quality problems already existing in the San Diego region. The San Diego area was ranked as having the sixth worst ozone problem among cities in the United States in 2018.³ San Diego was ranked the seventh dirtiest city in the country in 2017, with respect to ozone pollution, indicating that rather than improving, San Diego's air quality *worsened* relative to other cities.⁴

According to the Equinox Project's Air Quality Dashboard, in 2017, total unhealthy air days for all population groups in San Diego County increased from 42 days in 2016 to 62 days in 2017. The number of unhealthy air days for sensitive groups (people with lung disease, older adults and children) increased by 16 days in 2017, directly impacting the estimated 400,000 San Diegans who experience lung diseases, such as asthma or chronic obstructive pulmonary disease.

Air quality is a critical challenge throughout the region. Given this, local governments must continue to monitor ozone levels in the region, and take proactive policy steps when necessary. Data provided by the California Environmental Protection Agency, and local air pollution control districts should be utilized more extensively to inform decision-making on transportation and air quality initiatives.

San Diego has a history of failing to meet applicable air quality objectives. The San Diego Air Pollution Control District (APCD) stated in its 2009 Regional Air Quality Strategy (RAQS) that the area exceeded federal ozone standards on 24 days in 2009, and exceeded the more stringent

³ American Lung Association, State of the Air 2018; see also San Diego Fact Sheet, attached hereto as Ex. 2 and available at http://www.lung.org/local-content/california/documents/state-of-the-air/2018/sota-2018_ca_san-diego-fact.pdf.

⁴ See Ex. 3, American Lung Association, State of the Air 2018 fact sheet, available at http://www.lung.org/local-content/california/documents/state-of-the-air/2018/sota-2018_ca_most-polluted.pdf

AO-13 Section 5.2, *Air Quality*, of the PEIR analyzes potential air quality impacts of the BASASP and identifies potentially significant air quality impacts associated with construction and operational emissions. Vehicular emissions are only one source that contributes to the identified air quality impacts, as detailed in Table 5.2-6 of the PEIR. The PEIR identifies mitigation to reduce air quality impacts (AQ-2 through AQ-4), but the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes air quality impacts are significant and unavoidable even though such impacts associated with future development proposals implemented under the BASASP may be less than significant or mitigated to below a level of significance with the identified mitigation.

The Regional Air Quality Strategy (RAQS) relies on information from the California Air Resources Board and the San Diego Association of Governments to predict future emissions and determine the strategies necessary to reduce air pollutant emissions. The RAQS is updated regularly to account for land use changes. The fact that the proposed BASASP is not entirely consistent with the assumptions factored into the current version of the RAQS does not mean that associated project emissions will not be accounted for or mitigated. The identified mitigation to ensure project consistency is to provide the land use changes to the San Diego Air Pollution Control District for the next update to the RAQS (AQ-1). This is standard practice for all local jurisdictions as part of the RAQS update process and does mean that the City is changing the rules or increasing the regional emissions inventory to downplay project impacts.

The PEIR was prepared in accordance with the CEQA Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000 et seq.). The conclusions and supporting analysis contained in the PEIR are supported by substantial evidence contained in the record.

AO-13
(cont.)

California standard for ozone on 127 days in 2007. Nor has San Diego consistently met the Health and Safety Code's 5% per year ozone reduction target.

The seriousness of San Diego's air pollution should not be minimized, and yet that is exactly what the BASASP does. Air pollutant impacts from construction and operation under the proposed BASASP are significant and unavoidable at the program-level.

Appendix B, the Air Quality Technical Report, states that the BASASP would not be consistent with the Regional Air Quality Strategy (RAQS) or the State Implementation Plan (SIP). Appendix B, Page ES-1. It further acknowledges that the proposed development and new land use designations would be expected to generate more average daily trips (ADT) than the uses currently allowed under the adopted community plan (55,625 ADT compared to 31,032 ADT) (see Appendix K). In addition, since neither the proposed land uses nor the vehicle trips proposed under the BASASP were included in the emissions assumptions underlying the RAQS, the BASASP is inconsistent with the RAQS. Appendix B also acknowledges the project would potentially impede the goals contained within the RAQS and would result in emissions of air pollutants during both the construction phase and operational phase of future development associated with the BASASP.

Implementation of Mitigation Measures AQ-2, requiring the analysis of potential construction period impacts from proposed development projects, and AQ-3, requiring the implementation of best available control measures for construction activities that exceed thresholds, are proposed to hopefully reduce construction emissions. But the report acknowledges future construction projects may not be able to satisfy the proposed mitigation measures at the project level, so mitigation "cannot be guaranteed."

The report briefly acknowledges that there would also be certain operational pollutants and emissions but minimizes any serious ongoing impact. On an operational level impacts from specific stationary facilities are distinguished from traffic and non-stationary impacts. No mitigation from

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Balboa Avenue Station Area Specific Plan

AO-13 (cont.)

Impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, the PEIR identifies mitigation measures that would avoid or reduce impacts and discloses where impacts cannot be mitigated to less than significant.

AO-13
(cont.)

specific facilities is suggested – rather these would be handled through public notice and required compliance with existing regulatory/audit requirements. Regarding the impact of increased traffic, the report acknowledges the proposed land use designations (i.e., the increased residential development) would be expected to generate more average daily trips, as noted above. Rather than proposing mitigation, the report concludes that when the RAQS are modified to reflect the higher housing density the significance of these impacts would be “less than significant.”

This approach suggests that changing plan documents is an acceptable run around significant environmental impacts. This is not the case. The report further suggests that a determination that the goals of the project are in line with the multi-modal strategy of SANDAG regional plan, will remedy air quality issues. Again, this is not the case.

As with the other issues analyzed in these comments, the BASASP suggests the goal of increasing housing density near trolley stations is a sufficiently important policy goal that other considerations should be ignored. But the overall goal of creating sustainable, walkable, environmentally friendly communities is not achieved through the BASASP. As acknowledged in the air quality report, the project will have a significant impact on air quality and will sharply increase emissions, commensurate with the increased density. The fact that this development occurs in a coastal zone, near important park land (Mission Bay) and watershed (Rose Creek), makes it even more important that the true impact of the project on air quality be recognized. Revision of current plans to allow greater density is not “mitigation” – rather it is after the fact doctoring of the documents and this approach does not satisfy the environmental review required under CEQA.

IV. The Alternatives Presented are Inadequate

The PEIR identifies three alternatives: a No Project Alternative; a Medium Density Alternative and the BASASP proposed alternative. The No Project Alternative is initially identified

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Balboa Avenue Station Area Specific Plan

AO-14

AO-14 In addition to the No Project Alternative: Adopted Community Plan and Medium Density Alternative that were evaluated in the PEIR, Section 10.4 in the PEIR identifies two other alternatives that were initially considered to reduce environmental impacts, including a Mobility Improvements Alternative and a Low Density Alternative. Descriptions of these alternatives and the reasons why they were not carried forward for further consideration is contained in Section 10.4.

While the No Project Alternative was identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) requires another environmentally superior alternative to be identified that if the No Project Alternative is identified as the environmentally superior alternative. The Medium Density would provide 562 fewer residential units than the proposed BASASP and that both would result in increased densities compared to the adopted Pacific Beach Community Plan. Both the proposed BASASP and the Medium Density Alternative meet the project objectives identified in Section 3.4 in the PEIR pertaining to pedestrian mobility and transit-oriented development. They both would create a mixed-use village that would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit. As with the proposed BASASP, the Medium Density Alternative would not make any changes to land use within Rose Creek; it would remain designated open space.

AO-14
(cont.)

as the environmentally superior alternative, but is then rejected because it does not “meet the purpose and objectives of the proposed BASASP, however, including identifying land use and mobility strategies to cohesively guide growth and development and foster walkable and transit-oriented communities.” ES-6. It then chooses the Medium Density Alternative as the Environmentally Superior Alternative. Respectfully, this alternative is only a slightly – ever so slightly – modified version of the BASASP. The Medium Density Alternative suffers from the same significant flaws of the higher density alternative. It does not improve mobility in the area, and the development would only interfere with the needs of existing residents. It does not create safe, viable options for bicyclists. It does not preserve or restore the Rose Creek Watershed or enhance the commercial fabric of the project area. The Medium Density Alternative should also be rejected and the City Council should go back to the drawing board to develop a project more in line with the needs of the surrounding communities.

Conclusion

The PEIR is a highly misleading document. It describes an idyllic transit-oriented community, but the increased housing density it proposes in one of the most heavily congested areas of the City would severely inconvenience residents in the surrounding communities. The City Council should be mindful that “The significance of an activity depends upon the setting.” *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 718, citing Cal. Code Regs., tit. 14 § 15064, subd. (b). The project would make it much harder for these residents to benefit from the trolley and would cause them to spend more, not less, time in their cars. The project would also compromise important open space resources in San Diego – Mission Bay and the related Rose Creek Watershed. These Concerned Clairemont Residents respectfully requests that the City Council reject the BASASP and the PEIR. Rather than increasing housing density in the Balboa Station Area, the City Council should focus on improving transportation first.

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Balboa Avenue Station Area Specific Plan

AO-15 The comment makes concluding remarks that summarize specific issues raised in previous comments. Please see Responses AO-2 through AO-14.

AO-16

These citizens also concur with and incorporate by reference any well-founded objections or comments to the proposed project. Further, these citizens have not addressed issues related to historical or tribal/cultural resources, we, without limitation, indicate our concern that the area of the proposed development includes important historical and cultural resources that are not being adequately preserved under the PEIR.

Respectfully submitted:

*Concerned Clairemont Citizens**

And by their attorneys:

/s/ Jan Westfall

/s/ Kendrick Jan

Cc: Donnie Clifton, Elizabeth Callahan

* Wet signatures are not included in this document for identity protection, but may be provided under seal to the City upon request.

AO-16 This comment states that important historical and cultural resources in the BASASP area are not being adequately preserved but does not provide supporting examples or information. Section 5.7, *Historical and Tribal Cultural Resources*, of the PEIR adequately addresses historical and cultural resources and potential impacts to such resources as a result of implementation of the proposed BASASP. It identifies potential impacts and mitigation to reduce impacts. In the case of historical and tribal cultural resources, impacts are assessed as significant and unavoidable even though mitigation is identified because the ability of future development to successfully implement the actions to fully meet the identified mitigation cannot be guaranteed at the program level. Thus, the PEIR concludes impacts associated with historical and tribal cultural resources are significant and unavoidable even though such impacts associated with future development proposals implemented under the BASASP may be less than significant or mitigated to below a level of significance with the identified mitigation.

COMMENTS

RESPONSES

Exhibit 1

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Planning Department

Community Profiles Pacific Beach

- [Pacific Beach Community Profile Home \(/planning/community/profiles/pacificbeach/\)](#)
- [Planning Group Agendas and Minutes \(/planning/community/profiles/pacificbeach/agendas/\)](#)
- [Current Community Plan \(/planning/community/profiles/pacificbeach/plan/\)](#)
- [Community Contact Information \(/planning/community/profiles/pacificbeach/contact/\)](#)
- [Parks & Other Community Services \(/planning/community/profiles/pacificbeach/parks/\)](#)
- [Mission Boulevard Public Spaces and Active Transportation Plan \(<https://www.sandiego.gov/planning/programs/transportation/missionboulevard/>\)](#)

The Pacific Beach community planning area is located along the western edge of the mid-coastal region of the City of San Diego. It is bounded on the north by La Jolla, on the east by Interstate 5 and Clairemont Mesa, on the south by Mission Bay Park and Mission Beach, and on the west by the Pacific Ocean.



The primarily residential (76%) community of Pacific Beach is physically identified by its proximity to water, both the coastal bluffs and beaches of the Pacific Ocean and the beaches of Mission Bay to the south. The coastal plain that encompasses the majority of Pacific Beach rises to steep hillsides to the north, bordering La Jolla.

Pacific Beach was included within the original Pueblo Lands, which divided the area into a large grid pattern in the mid-1800s. Although residential construction began at that time, the majority of the community was built out after 1930. Approximately 97 percent of the community's land area has been developed. Consequently, the development at this time is primarily infill.

In 1970, a Mission (Beach)-Pacific Beach Community Plan was adopted. In 1974, the City Council adopted the Mission Beach Precise Plan, amending the 1970 plan to remove the Mission Beach planning area from it, thus creating the first Pacific Beach Community Plan. The advent of the Coastal Act was one of the many reasons to update the plan in 1983, creating the Pacific Beach Community Plan and Local Coastal Program Land Use Plan. That plan was amended in 1999 to reduce the residential land use designation density in most of the community's multiple dwelling unit areas. A subsequent plan update in 1995 that dealt with a range of issues resulted in the plan currently in use.

Balboa Avenue Station Area Specific Plan Process

Public Review Draft Now Available

The City has evaluated and provided recommendations for the areas adjacent to the Mid-Coast trolley station at Balboa within the Pacific Beach and Clairemont Mesa community planning areas. The recommendations address the future form of development in light of the introduction of the Mid-Coast Light Rail Transit (LRT) Trolley extension. In addition to land use and urban design recommendations, mobility improvements throughout the area have been identified for bicyclists, pedestrians, vehicles, and transit users.

The Balboa Avenue Station Area Specific Plan builds upon the technical analysis and recommendations prepared and public input received throughout the process. The specific plan provides policies and recommendations that address land use, mobility, urban design, recreation, and conservation to enhance the Specific Plan Area.

[\[Balboa Avenue Station Area Specific Plan Draft](#)

[//www.sandiego.gov/sites/default/files/balboa_avenue_station_area_specific_plan_public_review_draft_171204_2.pdf\]](http://www.sandiego.gov/sites/default/files/balboa_avenue_station_area_specific_plan_public_review_draft_171204_2.pdf)

[\[Draft Balboa Avenue Station Area Specific Plan Rezone Map B4330](#)

[//www.sandiego.gov/sites/default/files/draft_basasp_rezone_map_b4330_0.pdf\]](http://www.sandiego.gov/sites/default/files/draft_basasp_rezone_map_b4330_0.pdf)

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COMMENTS

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[Draft Pacific Beach Community Plan Amendment – Balboa Avenue Station Area Specific Plan](http://www.sandiego.gov/sites/default/files/draft_pacific_beach_community_plan_amendment_-_balboa_avenue_station_area_specific_plan.pdf)
http://www.sandiego.gov/sites/default/files/draft_pacific_beach_community_plan_amendment_-_balboa_avenue_station_area_specific_plan.pdf

Please submit comments on the Draft Specific Plan by **Friday, January 26th, 2018**.

Questions regarding the Specific Plan can be sent via email to:

Michael Prinz, Senior Planner

Planning Department

mprinz@sandiego.gov (<mailto:mprinz@sandiego.gov>)

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Community Planning

- [Community Planning Home \(/planning/community/\)](/planning/community/)
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 - [Agendas \(/planning/community/cpc/agendas/\)](/planning/community/cpc/agendas/)
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 - [Meeting Minutes \(/planning/community/cpc/minutes/\)](/planning/community/cpc/minutes/)
 - [Other Resources \(/planning/community/cpc/resources/\)](/planning/community/cpc/resources/)
- ▼ [Community Planning Groups \(/planning/community/cpg/\)](/planning/community/cpg/)
 - [Community Bylaws \(/planning/community/cpg/bylaws/\)](/planning/community/cpg/bylaws/)
 - [Frequently Asked Questions \(/planning/community/cpg/faq/\)](/planning/community/cpg/faq/)
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 - [Community Media Resources \(/planning/community/resources/media/\)](/planning/community/resources/media/)
 - [Public Involvement Resources \(/planning/community/resources/public/\)](/planning/community/resources/public/)
- [Community Plans \(/planning/community/plans/\)](/planning/community/plans/)
- [Community Profiles \(/planning/community/profiles/\)](/planning/community/profiles/)
- [Overview & Background \(/planning/community/overview/\)](/planning/community/overview/)

Planning Department

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Email: planning@sandiego.gov (<mailto:planning@sandiego.gov>)

Pacific Beach Community
Planning Group Website (<http://www.pbplanning.org/>)

Pacific Beach
Facilities Financing Plan (</facilitiesfinancing/plans/pacificbeach/>)

Additional Information

Community Planning Group
Contact List (</planning/community/contacts/>)

Demographic Information (<http://datasurfer.sandag.org/api/census/2010/cpa/pacific%20beach/export/pdf>) (PDF)

 **Pacific Beach Community Map**
(</sites/default/files/legacy/planning/community/profiles/pacificbeach/pdf/mappacificbeach.pdf>)

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COMMENTS

RESPONSES

Exhibit 2

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STATE OF THE AIR 2018

San Diego/
Imperial County
REGIONAL SUMMARY

Rank Among U.S. Cities for Unhealthy Air		
Metro Area	Ozone Rank	Particle Rank
El Centro	15	9
San Diego	6	—

Regional Grades and Unhealthy Air Days				
County	Ozone Days [†]	Ozone Grade	Particle Days [†]	Particle Grade
Imperial	17.2	F	11.2	F
San Diego	36.8	F	1.5	C

[†] Number of Days reported equals the weighted annual average of unhealthy ozone or particle days recorded over the three-year period of 2014 - 2016. An annual average of 3.3 or more unhealthy days earns an "F" grade.

Healthy Air Goals

Key actions needed for clean air

- Protect the Federal Clean Air Act and California authority to regulate vehicle emissions.
- Clean up refineries, ports, railyards, warehouses and other pollution hotspots to protect impacted communities from harmful emissions.
- Support the transition to zero emission transportation through investments and regulations increasing emission-free cars, heavy duty trucks and transit and school buses.
- Reduce agricultural burning and residential wood burning. Support electric heating options wherever possible.
- Invest in healthier, more walkable communities and reduce vehicle trips.



"We all need to be aware of what we can do to improve the air."

Clean air means so much to me. I am a lung cancer survivor and my lungs are still recovering.

I don't want to spoil my recovery by drawing pollution particles into my lungs just by breathing the air around me.

We all need to be aware of what we can do to improve the air — not just for me, but for all of us.

— NANCY GATSCHET, SAN DIEGO, CA



For Media Inquiries Contact:
Ryan Endean
Ryan.endean@lung.org

For Policy Inquiries Contact:
Bonnie Holmes-Gen
Bonnie.holmes-gen@lung.org

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Who is at Risk in San Diego/Imperial County?

Air pollution affects us all, but millions of California residents face an elevated risk due to age, pre-existing conditions or living in a lower-income community. We must protect all residents, but especially those most vulnerable and impacted by air pollution.

Population at Risk in the Region	
Total Population	3,498,632
Under 18	780,157
65 Plus	468,991
Pediatric Asthma	59,981
Adult Asthma	211,499
COPD	118,216
Lung Cancer	1,490
Heart Disease	173,429
Diabetes	267,755
Poverty	440,629

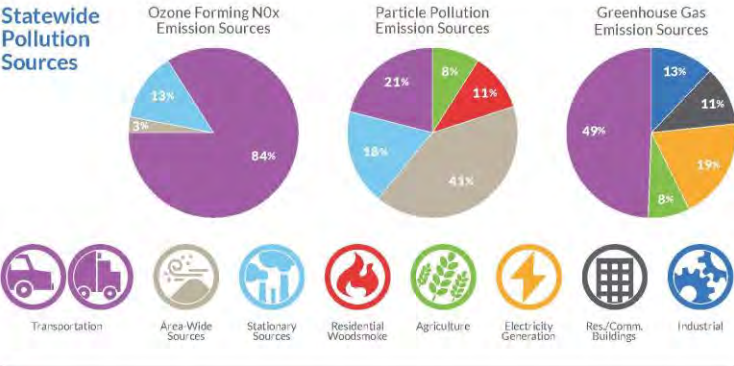
El Centro Unhealthy Ozone Days
STATE OF THE AIR 2000 - 2018



San Diego Unhealthy Particle Pollution Days
STATE OF THE AIR 2004 - 2018



Statewide
Pollution
Sources



www.stateoftheair.org/california2018
CaliforniaLung @CaliforniaLung
American Lung Association in California
CaliforniaLung

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COMMENTS

RESPONSES

Exhibit 3

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STATE OF THE AIR 2018

California Metropolitan Areas
among Top Ten most impacted by air pollution in the US

Ozone Pollution		
Metropolitan Area	US Rank 2018	US Rank 2017
Los Angeles-Long Beach	1	1
Bakersfield	2	2
Visalia-Porterville-Hanford	3	4
Fresno-Madera	4	3
Sacramento-Roseville	5	8
San Diego	6	7
Modesto-Merced	7	6
Redding-Red Bluff	9	17

Short-Term Particle Pollution		
Metropolitan Area	US Rank 2018	US Rank 2017
Bakersfield	1	1
Visalia - Porterville - Hanford	2	2
Fresno-Madera	3	2
Modesto - Merced	5	4
San Jose - San Francisco - Oakland - Stockton	6	6
Los Angeles-Long Beach	7	9
El Centro	9	11

Year-Round Particle Pollution		
Metropolitan Area	US Rank 2018	US Rank 2017
Visalia-Porterville-Hanford	2	1
Bakersfield	3	2
Los Angeles-Long Beach	4	5
Fresno-Madera	5	3
Modesto-Merced	6	6
El Centro	7	7
San Jose - San Francisco - Oakland - Stockton	10	4

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June 10th, 2018

Alyssa Muto, Deputy Director, City of San Diego Planning Department
 Rebecca Malone, Environmental Planner, City of San Diego Planning Department
PlanningCEQA@sanidiego.gov

Re: Project Name: Balboa Area Transit Specific Plan (BATSP)
 Project No: 585601/SCH No. 2017071007
 Community Area: Pacific Beach
 Council District: 2

Dear Alyssa and Rebecca,

Thank you for the opportunity to respond to the BATSP PEIR Draft and provide my personal and professional perspective on this extremely important planning process impacting the future of Pacific Beach.

As a 3rd generation San Diegan, who grew up within a few miles of the future Balboa/Pacific Beach Transit Station and spent most Sunday's of my childhood into adulthood water skiing in Mission Bay, and currently a long time resident and business owner in Pacific Beach, I have experienced Pacific Beach's glory and Pacific Beach's lowliness over the past 50 years.

As an experienced professional and leader in the sustainable and neighborhood development community, I fully understand the opportunities the BATSP presents if planned appropriately with the upcoming operation of the Mid-Coast Trolley.

Pacific Beach and the 92109 zip code, being one of the top producing zip codes relative to the TOT tax directed to the City of San Diego, has allowed the City of San Diego to take from our community and not reinvest proportionately. With the current Pacific Beach Community Plan, dated 1985, including a timeline of 10 years for project completions, with 90% of the outdated plan never implemented, does not allow for tremendous confidence in the City of San Diego when I read oddly similar language in the BAT Specific Plan and PEIR Draft.

Below is the stated City of San Diego *Balboa Avenue Station Area Specific Plan*. What strikes me is the resemblance of the PB Community Plan, circa 1985 never implemented.

Sustainability Matters® | 910 Grand Avenue, Suite 201 San Diego, CA 92109 USA | 619.696.1068
www.sustainabilitymatters.us

AP-1

AP-1 The comment provides introductory statements about the Balboa Avenue Station Area Specific Plan (BASASP) but does not raise any California Environmental Quality Act (CEQA)-related issues. No further response is required.



Executive Summary

- Provide a plan that allows for a mix of land uses that serves residents, generates economic prosperity, and capitalizes on visitor traffic;
- Establish a plan that encourages high density residential or mixed-use development; higher intensity employment areas, and activity centers within walking or biking distance of transit corridors and the trolley station;
- Increase the supply and variety of housing types – affordable for people of all ages and income levels – in areas with frequent transit service and with access to a variety of services;
- Focus development in an area where there is available public infrastructure and transit;
- Increase mobility for pedestrians, cyclists, transit users, and automobiles through improved linkages at key points, with a strong pedestrian focus;
- Identify key mobility improvements to facilitate connections within and through the BASASP area, as well as to surrounding areas;
- Identify design criteria for urban public spaces, such as mini-parks, plazas, promenades, and venues that support a variety of events and gatherings;
- Expand access to park and recreation facilities within and adjacent to the BASASP area, including trail options and joint use opportunities, to promote a healthy, active community;
- Incorporate sustainability practices, policies, and design features into projects within the BASASP area that reduce greenhouse gas (GHG) emissions; and
- Craft a clear and practical implementation strategy for properties and improvements within the BASASP area.

Speaking professionally, I believe it is time for the City of San Diego to be accountable and provide appropriate resources to create fabulous, innovative, connected, economically viable opportunities prioritizing Place, Prosperity, Health + Well Being, Connectivity, Living Infrastructure and Resource Regeneration within Transit Oriented Development areas, specifically the BATSP within Pacific Beach and the San Diego region.

By stating "Establish a TOD village that capitalizes on the trolley station investment by the San Diego Association of Governments (SANDAG) and MTS", I believe the City of San Diego has missed the mark. The BATSP does not provide the foundation necessary to develop a sustainable, transit oriented neighborhood. There are precedence's for us to follow.

The Capital Hill EcoDistrict originated by a community organization understanding the future impact of the new rail transportation extending into their neighborhood. The Capital Hill EcoDistrict <http://capitolhillecodistrict.org/> is a thriving example of a well planned and executed densely population urban village prioritizing place, prosperity, health + wellbeing, connectivity, living infrastructure and resource regeneration.

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AP-1
(cont.)



My questions to the BATSP PEIR draft response:

1. How does the City of San Diego plan to integrate and measure; place, prosperity, health + wellbeing, connectivity, living infrastructure and resource regeneration, all Pacific Beach EcoDistrict priorities, within the BATSP boundaries in a detailed and thoughtful process?
2. How does the City of San Diego plan to mitigate and measure the environmental impact to the Pacific Beach community through the boundaries of the specific plans namely, but not limited to; BATSP, DeAnza Revitalization, Rose Creek and ReWild, (all potential recipients of the overall negative impacts of the BATSP increased housing, commercial and light industrial density, inadequate and unsafe mobility options) with abundantly necessary City of San Diego resources necessary to properly plan for a successful TOD EcoDistrict?
3. Lastly, please explain the City of San Diego's plan and implement the Pacific Beach EcoDistrict imperatives of Equity, Resilience and Climate Protection within the BATSP PEIR draft specific to housing, jobs and carbon neutrality.

I look forward to receiving thoughtful, detailed responses to my questions of concern for my community specific to the BATSP PEIR.

Sincerely,

Kristen Victor, LEED AP Legacy, EcoDistrict AP

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AP-2 The BASASP includes policies within the Land Use, Mobility, Urban Design, and Conservation Chapter that are consistent with the measures of the EcoDistrict Performance areas, including Appropriate Development, Health and Well Being, and Access and Mobility. Policies within the BASASP require active frontages and address measures including multi-modal connections, street trees, storm water filtration, drought-tolerant landscaping, and provide guidance for usable outdoor spaces. The Urban Design and Conservation Chapters further promote sustainability within the BASASP area through the inclusion of policies addressing site and building design, including energy consumption, use of drought-tolerant landscaping, and integration of storm water best management practices to help implement the goals of the General Plan and Climate Action Plan (CAP). Also, the CAP Consistency Checklist would be applied as a part of the development permit review process. Additionally, energy efficiencies within future development would be realized through the mandatory energy requirements of the California Green Building Standards Code (CALGreen) and the California Energy Code (Title 24 of the California Code of Regulations). CALGreen addresses enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices.

AP-3 The PEIR was prepared in accordance with the CEQA Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000 et seq.). The conclusions and supporting analysis contained in the PEIR are supported by substantial evidence contained in the record. Impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, the PEIR identifies mitigation measures that would avoid or reduce impacts and discloses where impacts cannot be mitigated to less than significant.

COMMENTS

RESPONSES

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AP-4 The BASASP proposes to increase the capacity for new housing within the area by approximately 3,500 units as compared to the adopted Pacific Beach Community Plan. The range of densities within the BASASP area presents an opportunity to provide a range of housing opportunities, types, and affordability levels. Additionally, all properties are subject to the City's affordable housing requirements as outlined in the Inclusionary Housing Ordinance.

As discussed in the recent report by the San Diego Housing Commission, Addressing the Housing Affordability Crisis, rezoning residential areas within a half mile radius of the City's transit opportunity areas will be the largest single tool in providing additional housing in San Diego, a key factor in increasing the supply of units affordable to low- and moderate-income families. Concentrating housing around transit opportunity areas aligns with City, regional, and State goals, including the General Plan City of Villages Strategy, SANDAG's Smart Growth Plan, and the State of California's climate commitments, by facilitating alternatives to private vehicle transport and creating walkable, mixed-use areas.

Please see Response AP-2 regarding sustainability policies included in the BASASP.

COMMENTS

RESPONSES

AQ-1

From: Jeff Kucharski <kucharskijeff@gmail.com>
Sent: Tuesday, June 12, 2018 8:55 PM
To: PLN_PlanningCEQA
Subject: PROJECT NAME: Balboa Avenue Station Area Specific Plan PROJECT No.: 586601 / SCH No. 2017071007

Hello,

I share the concerns of pb planning about the lack of mobility options from Pacific Beach.

Unfunded bicycle/pedestrian bridge needs to be funded to solve this problem. Please my below post on Balboa Ave station that was posted on BikeSd website.

Jeff Kucharski

As anyone that has ridden along the [Rose Canyon Bike Path](#) or in the UTC area knows, SANDAG is in the process of extending the Mid-Coast Trolley from Old Town to UCSD and UTC area. The potential of this \$2.1 billion investment can only fully be realized by enhancing the accessibility of the stations to surrounding neighborhoods. The City of San Diego is currently drafting a planning document for the area around the Balboa Avenue Station. Eventually, the plan will be voted on by San Diego's City Council. (The current draft plan is can be read [here](#) and the image below shows the area being included in the plan.)

AQ-1 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances.

The BASASP includes a policy (Policy 3.1.4) to support the San Diego Association of Governments (SANDAG) and the San Diego Metropolitan Transit System (MTS) to consider a bicycle and pedestrian access via a connection across I-5 from the Balboa Avenue Trolley Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park and Mission Boulevard. Identification of funding sources and implementation of the facility would require further coordination by SANDAG and MTS.



Currently, the area depends on a very autocentric roadway design. The proximity of Interstate 5 and on-ramps and off-ramps into the area bring high speed traffic directly into the plan area. The northbound I-5 exit onto Mission Bay Drive encourages drivers to maintain freeway speeds into Pacific Beach. Despite high volume of bicycle traffic, Mission Bay Drive has no bicycle lanes. Rose Creek Bicycle Path is an alternative to this high speed road but the utility of this path is constrained by a narrow path, lack of lighting and frequent homeless encampments. Despite most businesses in the area having large parking lots, Mission Bay Drive allows free street parking. Traveling east of mission bay drive on Balboa Avenue, cyclists contend with high speed traffic, high speed interchanges with Morena Boulevard and an uphill climb into the Clairemont neighborhood. In short, the current conditions need improvement and are a barrier to area residents trying to access Mission Bay, the beach areas, and generally traversing the intersection of Balboa Avenue and I-5 / Morena Boulevard.

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Challenge for Bicyclist (Garnet/Balboa Ave Intersection with

Morena Blvd)

While the draft Balboa station does not fix all of these issues, it does attempt to make improvements.

For non-bicycle specific infrastructure, the plan supports the elimination of free rights and other high speed conditions in the below examples.

- Removal of freeway style ramp eastbound Balboa Ave to Morena Blvd ramp
- Changing an I-5 off ramp onto Balboa Ave to a signalized (albeit widened) off ramp
- Add a traffic signal at westbound Balboa Ave & Morena ramps and remove free right turn ramps

Recommended Bicycle specific infrastructure

- Enhance Rose Creek Path
- Class II bike lanes on Mission Bay Drive
- Class II bike lanes from Santa Fe st to Moraga St (width permitting)
- Class II bike lanes on Bunker Hill road
- Class III (Sharrows) on Garnet from Mt Soledad Road to Santa Fe Street
- Class IV (cycletrack) on Santa Fe Street (Purpose of this cycletrack appears to allow cyclists to access Rose Canyon and points north since Santa Fe is recommended to be southbound only in the plan)
- Class IV (cycletrack) Morena Blvd (west side) from Gesner to Balboa Station

Overall, the plan recommends a lot of improvements that will help bicyclists. As a frequent commuter through the area, I am excited about the bike lanes on Mission Bay Drive. The current state requires a bicyclist to control the lane with honking, hostile motorists. Removing some automobile parking for a bike lane is needed to create high quality, safe bike lane.

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COMMENTS

RESPONSES

So for the bicyclist commuting north/south through the area, this plan provides improvements. However, it does not appear that this plan does anything to slow freeway traffic from I-5 as it exits from I-5 northbound. This should be corrected as it is a major hazard.

Biking to and through the plan area from Pacific Beach will remain a challenge. Grand and Garnet Avenues are the only roads that travel over Rose Creek. In the draft plan, sharrows (class III) are recommended on Garnet to reach the station area. The Pacific Beach Planning Group is not happy with that [recommendation](#). The PB planning group calls the recommended sharrows "unacceptable."

A pedestrian/bicyclist bridge crossing I-5 from Bunker Hill St is proposed in the plan. This would provide a stress-free route for bicyclists to access the trolley station. The PB planning group asked for the plan to include the pedestrian/bicycle bridge over I-5 in the earliest phase. However, a funding source and commitment needs to be identified. Since it helps the City of San Diego reach both Climate Action Plan goals and maximize the investment in the expanded trolley, this project should be a high priority for the city.



The city is still looking for feedback on its plan. Please ask the city to prioritize safe bicycle routes (including the I-5 bridge!) in the plan. Provide feedback to city of San Diego planning department, Michael Prinz, Senior Planner, Planning Department, Mprinz@sandiego.gov. Another option to give feedback is the city provided [website](#). As you probably suspect, not everyone wants bicycles accommodated. Don't allow the below comment represent your views and dilute the potential great improvements that could be implemented.

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COMMENTS

RESPONSES

From: Nicole Burgess <nicole23ob@gmail.com>
Sent: Tuesday, June 12, 2018 10:49 PM
To: PLN_PlanningCEQA
Cc: Prinz, Michael
Subject: Balboa Avenue Station Area Specific Plan EIR Comments

Regarding Project No.586601
 Balboa Avenue Station Area Specific Plan EIR Comments

Thank you for the opportunity to make comments to the EIR for the Balboa Area Transit Specific Plan (BATSP). This is an important plan that can help create innovative mobility and equitable housing as we protect our environment and create a more sustainable community.

AR-1

As the District 2 Representative for the City's Bicycle Advisory Board, I am very concerned with the bicycle and pedestrian access from and to the station and the surrounding communities. I support the comment letters from PB Planning Group and beautifulPB and would like to highlight some specifics that are important.

AR-2

Environment:

- To protect, improve, and showcase our watershed as a sustainable and healthy component of the community. Request the City to integrate innovative practices to capture and enhance Rose Creek and to create a greenbelt along both sides of the river for people to walk, ride, learn, and explore the natural surroundings and bring awareness to the value of our ecosystems. Recommend the use of NACTO Storm Water Guidelines to capture and manage our water supply.

Mobility:

- To create safe, comfortable, and reliable access from and to the station and the local communities.
 1. Collaborate with MTS and SANDAG to provide EV shuttles consistently to surrounding neighborhoods, including but not limited to, the beach community and up the hill to Clairmont.

2. Create safe and comfortable access for people who walk and ride bikes.
 - a. Prioritize overpass/underpass across the I-5
 - b. Prioritize Safety for Active Commuters rather than LOS for vehicles
 - c. Eliminate the addition of third traffic lane on Garnet Avenue and replace with a Class

IV bikeway

Mission Bay Park

including but not

made to the

walk and ride

separation for

- d. Provide safe access with use of bike signals from E Mission Bay Drive across Grand to
- e. Eliminate free right from Grand Avenue heading to I-5
- f. Recommend use of NACTO Bike Guidelines to implement innovative treatments, limited to, bike boxes, separated bike facilities, and a lot of green paint.
- g. Include bicycle wayfinding signage throughout the project boundaries.
- h. Use of Vision Zero Systematic Approaches for Safety as any and all improvements are roadway
- i. Use LTS (Level of Traffic Stress) rather than LOS (Level of Service)
- j. Widen the underpass on Balboa Avenue and dedicate specific space for people who
- k. Request any improvements to the area be made to support CAP and VZ goals.
- L. Recommend the use of NACTO Storm Water Guidelines to create bioswales as the bikes, pedestrians, and vehicles.
- M. Upgrade and improve existing Class 1 bikeway along Rose Creek

AR-1

This comment is an introductory statement and identifies the issues raised in subsequent comments. See responses AR-2 through AR-4, which address specific comments relative to these issues.

AR-2

The Balboa Avenue Station Area Specific Plan (BASASP) does not propose any changes to land use within Rose Creek. The parcels would remain designated open space and the City's Multiple Species Conservation Program (MSCP) Land Use Adjacency Guidelines for protected open space lands would apply to the area. Storm water management within the City is governed by regulatory requirements, including the City's Jurisdictional Runoff Management Plan and Storm Water Standards Manual, which comply with National Pollutant Discharge Elimination System Permit requirements.

AR-3

This comment provides specific recommendations regarding the Balboa Avenue Station Area Specific Plan but does not raise any California Environmental Quality Act-related issues. No further response is required.

COMMENTS

RESPONSES

AR-4

Housing:
- I am a fan of infill and greater density. I do support eliminating height limit within 0.5 miles of transit station so that we can meet density needs but have a more diversified multi layered community that provides opportunity to create more open space

The new Balboa Transit Station has great potential to improve this area and to create a vibrant community. Thank you for the time to acknowledge recommendations to make this transit station a success.

Please feel free to contact me if you have any questions. nicole230b@gmail.com

Best Regards,

Nicole Burgess

AR-4 The City acknowledges this comment in support of infill development and increased density.



beautifulPB
953 Reed Ave.
San Diego, CA 92109

June 12, 2018

Alyssa Muto, Deputy Director, City of San Diego Planning Department
Rebecca Malone, Environmental Planner, City of San Diego Planning Department
PlanningCEQA@sandiego.gov

Re: Project Name: Balboa Area Transit Specific Plan (BATSP)
Project No: 586601/SCH No. 2017071007
Community Area: Pacific Beach
Council District: 2

Dear Alyssa and Rebecca,

Pacific Beach recognizes the vision, collaboration and commitment needed to appropriately plan and address the most challenging issues we face in the City of San Diego. The Balboa Area Transit Specific Plan (BATSP) provides the City of San Diego and the Pacific Beach EcoDistrict an immense opportunity to create innovation mobility and equitable housing as we protect our environment. Thank you for the engagement of beautifulPB in this vital process in creating a more sustainable Pacific Beach.

Pacific Beach is a nationally recognized EcoDistrict, pending certification as one of the first certified EcoDistricts in North America. The Pacific Beach Planning Group EcoDistrict Sub-Committee led (4) public meetings to review the BATSP. The PBEcoDistrict led (2) Community Town Hall meetings, specific to the BATSP in October 2014 and May 2018.

beautifulPB asks that the BATSP EIR include the EcoDistrict Principles in the planning and implementation process based on our 4-year community engagement metric through ConnectPB and ConnectPB2. (See Addendum 1 and Addendum 2)

EcoDistrict Principles:

Place

GOAL: Create inclusive and vibrant communities.

OBJECTIVES: Strong civic engagement; preservation and celebration of culture and history; diverse and affordable housing; and accessible public spaces and services for daily needs.

Prosperity

GOAL: Support education and economic opportunities that build prosperity and accelerate innovation.

OBJECTIVES: Equitable access to quality education and career pathways, a robust employment base with increasing jobs and job quality, and entrepreneurial innovation and business start-ups.

Health + Wellbeing

GOAL: Nurture people's health and happiness.

AS-1

AS-1 The Balboa Avenue Station Area Specific Plan (BASASP) includes policies within the Land Use, Mobility, Urban Design, and Conservation Chapter that are consistent with the measures of the EcoDistrict Performance areas, including Appropriate Development, Health and Well Being, and Access and Mobility. Policies within the BASASP require active frontages and address measures including multimodal connections, street trees, storm water filtration, drought-tolerant landscaping, and provide guidance for usable outdoor spaces.

The Urban Design and Conservation Chapters further promote sustainability within the Specific Plan area through the inclusion of policies addressing site and building design, including energy consumption, use of drought-tolerant landscaping, and integration of storm water best management practices to help implement the goals of the General Plan and CAP. Also, the CAP Consistency Checklist would be applied as a part of the development permit review process.

Additionally, energy efficiencies within future development would be realized through the mandatory energy requirements of the California Green Building Standards Code (CALGreen) and the California Energy Code (Title 24 of the California Code of Regulations). CALGreen addresses enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices.

AS-1
(cont.)

OBJECTIVES: Active living based on walkability and recreation; equitable health outcomes based on accessible, affordable health care; affordable, local fresh food; remediated toxic environments; and strong public safety.

Connectivity
GOAL: Build effective and equitable connections between people and places.
OBJECTIVES: A street network accommodating diverse ages and abilities using multiple travel modes and shared mobility options, and a high-quality digital network providing equitable connectivity and leveraged community data.

Living Infrastructure
GOAL: Enable flourishing ecosystems and restore natural capital.
OBJECTIVES: Healthy soils, water, trees, and wildlife habitat; accessible nature; and natural processes integrated into the built environment.

Resource Restoration
GOAL: Move towards a net positive world.
OBJECTIVES: Increase efficient water use; divert waste from landfills; productively reuse remediated land; and pursue energy efficiency, technology advancements, and clean, renewable energy production that reduces greenhouse gas emissions.

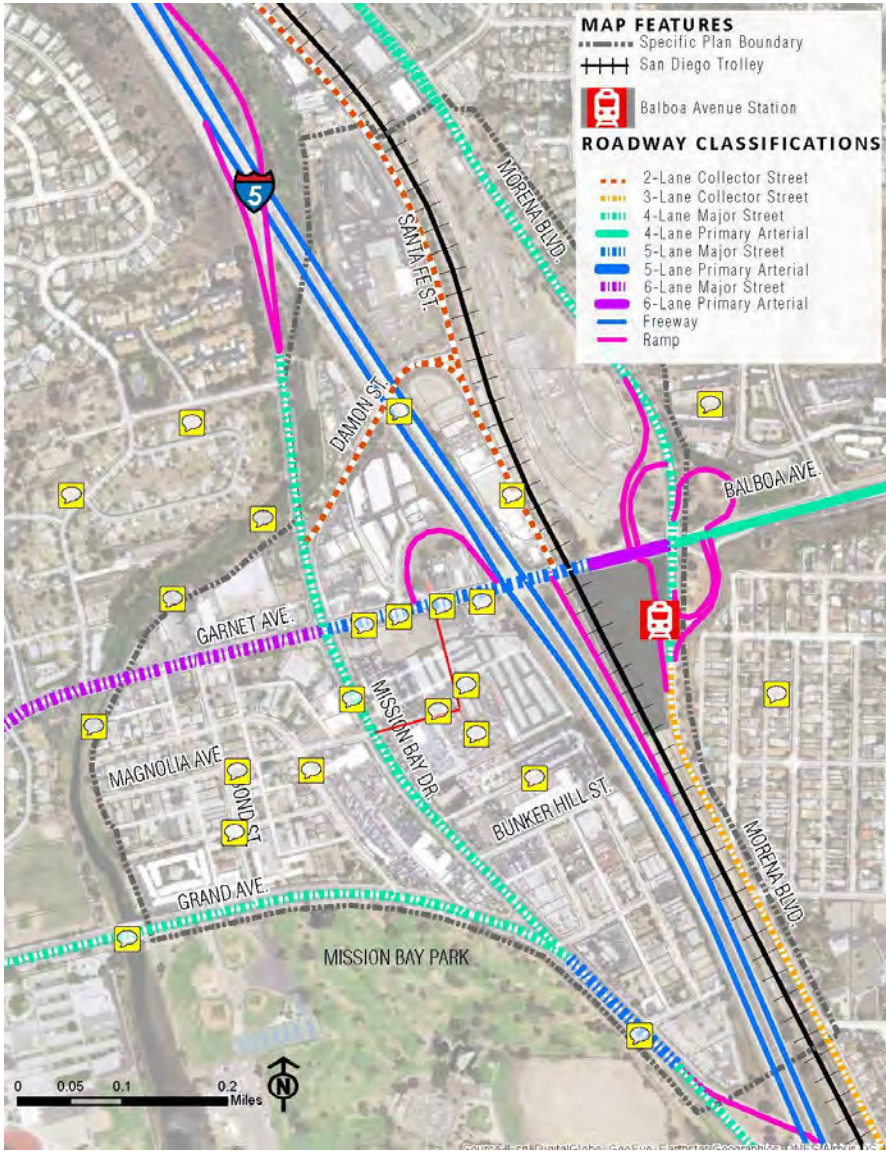
Thanks you for your consideration



Kristen Victor, Board Member and Past President
Beautiful PB,
A 501(c)3 Non-Profit Corporation

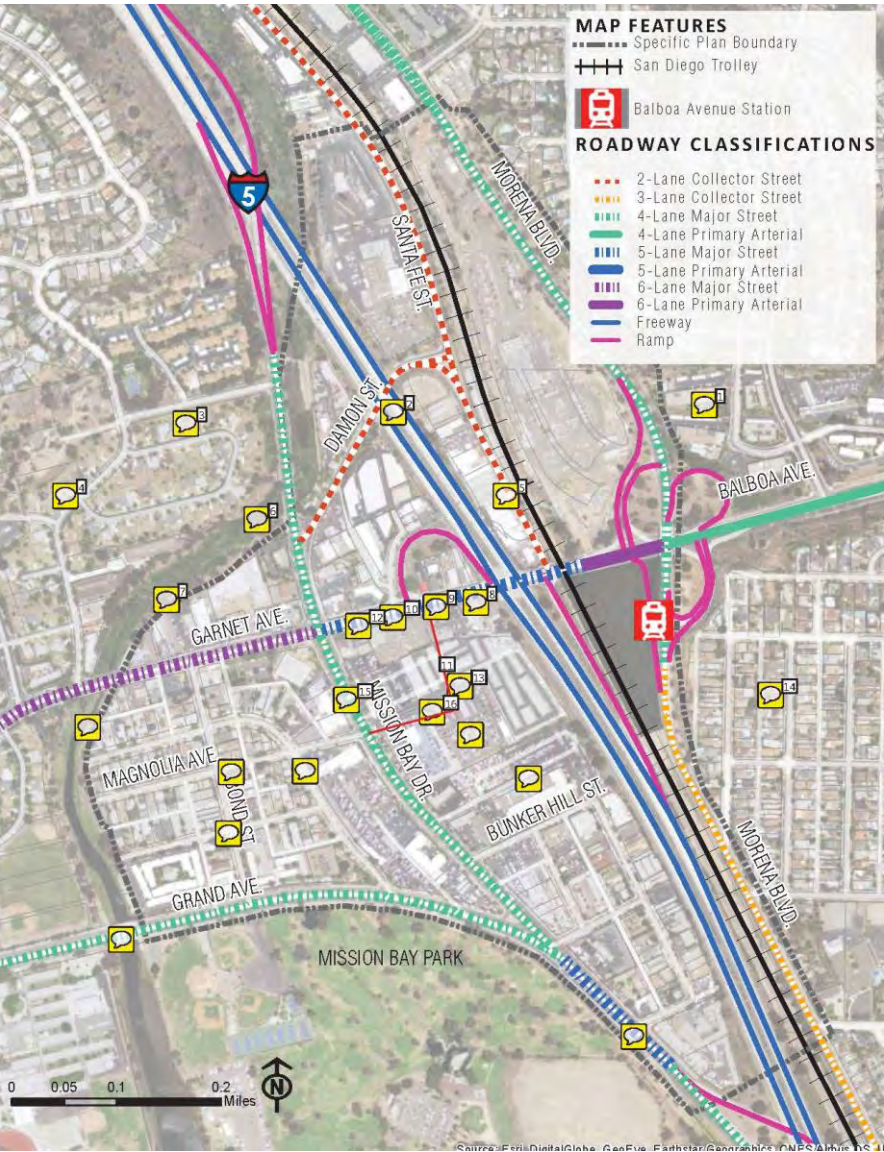
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Addendum 1



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Addendum 2



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Addendum 2

Summary of Comments on Connect PB Comments.pdf

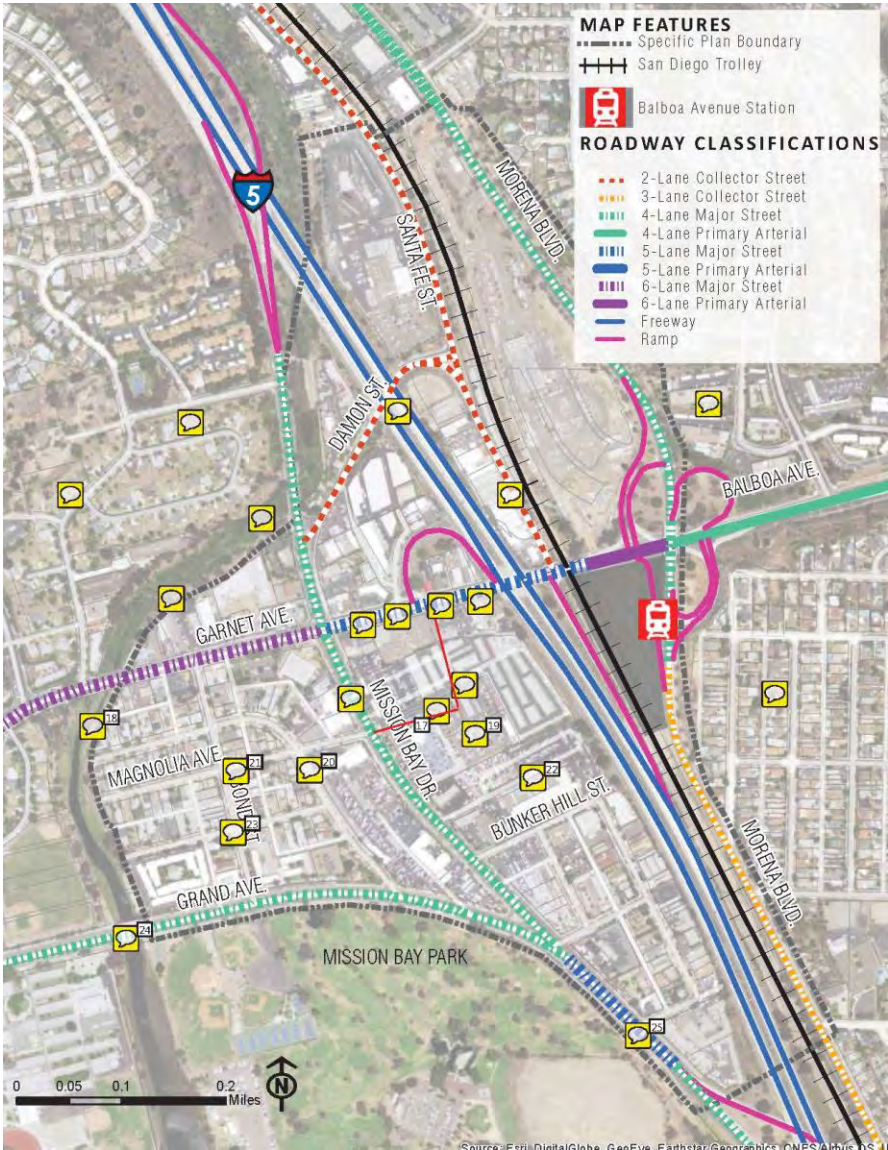
Page: 1

Number: 1	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:41:20 AM
Maintain and enhance multifamily zoning.			
Number: 7	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:45:24 AM
Pedestrian Crossing			
Number: 3	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:50:25 AM
General housing comments:			
*middle income not enough housing			
*designating low income one area needs to change			
*pushing low income segregation			
*maintain multi residential, not fill with luxury homes			
*diversity in community can be achieved by different types of affordable housing			
*balancing with open environment			
*design guidelines can be created based on eco-principles			
Number: 4	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 7:06:00 AM
General Mobility comments:			
*Shuttle system (frequent, private sector?)			
*Better facility around Rose Creek (cultural trail)			
*Fear of additional lanes on Garnet/Balboa			
*Better N-S & E-W connection			
*Resurface/Repurpose per Bike Master Plan			
*CIP solutions - Bridge, Tunnels, Skyfan			
*Neighborhood pathway from Balboa transit through development to Magnolia Ave.			
*Electric vehicle / Private Sector shuttle, PB, LI, MB i.e. Sunrunner, 1st phase, fun & unique			
*Better bike facility along rose creek			
*Support the bike share program in PB			
*Highlight benefits of bike riding and enhance safety			
Number: 5	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 7:09:27 AM
Santa Fe is an incline			
Number: 6	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:47:41 AM
Rose Creek - Proposed Designated Parkway			
Number: 7	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:31:33 AM
Several comments were provided related to the environment and Rose Creek:			
* Guiding Principles should be identified for development to meet along and near Rose Creek			
* The landscape element should be enhanced both in the specific plan and the community plan to address environmental issues.			
*The project should incorporate more innovative management techniques for storm water management.			
*All development should be required to consider its location and relevance within the watershed and should incorporate water collection and reuse.			
*The Rose Creek interface with bike and pedestrian access needs to be upgraded. (As example is the Mission Valley/San Diego River area)			
Number: 8	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:53:57 AM
Do not add another traffic lane on Garnet. Focus on bikes and peds.			
Number: 9	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:54:34 AM
There should be no extra car lane on Garnet west of the highway.			
Number: 10	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:35:48 AM
The proposed 3rd vehicle lane on Garnet will make Garnet less conducive to pedestrian and bicycle traffic, create more of a safety issue, and induce more vehicle traffic. Please consider removing this and if right of way is available use to enhance the area or support other transportation modes.			
Number: 11	Author: 30054	Subject: Line	Date: 6/12/2018 6:44:39 AM
Add planned bike connection through future development			
Number: 12	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 7:00:46 AM
No extra lane @ Garnet, Extra bike/ped			
Number: 13	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:38:43 AM
The specific plan should encourage diverse/mixed income communities.			
Number: 14	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:42:38 AM
Stay true to existing zoning in place for multifamily housing			
Number: 15	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:56:30 AM
Protected (or at least better) bike lanes running north/south along Mission Bay Drive & connecting Santa Fe to Mission Bay. Really dangerous street right now. Improve Rose Creek as well - better connections to streets perpendicular to the trail.			
Number: 16	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:43:25 AM

Comments from page 1 continued on next page

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Addendum 2



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Addendum 2

Number: 17	Author: 30054	Subject: Line	Date: 6/12/2018 6:44:52 AM
Add planned bike connection through future development.			
Number: 18	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:58:01 AM
Only one side of Rose Creek is addressed in the plan, need to address both sides.			
Number: 19	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:39:28 AM
The specific plan should include design guidelines for high density areas that are inline with the Pacific Beach EcoDistrict.			
Number: 20	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:47:06 AM
General housing comments: "Diverse housing typologies (mixed use/multifamily), town houses, apartments "no monolithic design "maybe taller than 30' "favor higher density			
Number: 21	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:37:30 AM
Magnolia provides an opportunity to create a stronger connection to the Rose Creek Bike Path. Currently, the connectivity planned from the station to the bay is not sufficient. Please consider further enhancements to this connection to support bike and pedestrian movement.			
Number: 22	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:41:54 AM
Design guidelines should be developed for an EcoDistrict Village			
Number: 23	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:40:01 AM
Residential/multifamily zoning needs to be maintained.			
Number: 24	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:53:06 AM
Need to plan for safe connections to schools. Mission Bay high School and Barnard Elementary are adjacent and not well connected.			
Number: 25	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:43:25 AM
Need to enhance pedestrian crossing/access			

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Donna Regalado

6/12/18

Rebecca Malone, AICP
Senior Planner
City of San Diego Planning Department

Response to the Proposed Environmental Impact Review/Balboa Station Area Specific Plan (PEIR/BSASP)

Dear Ms. Malone,

Although I have been a member of the Balboa Station subcommittee for Clairemont, I am submitting the following comments as an independent resident of Clairemont/Bay Ho. I have contributed comments for the final CCPG letter in response to this PEIR, but the following written comments are my own and have not been presented to the CCPG Board.

I understand this is a review of the PEIR, but my comments will reference the BSASP as well as the PEIR, in general. Reading and referencing the entire PEIR is exhaustive and there really should not be any conflicting areas between the two documents anyway.

- A. Along with the proposal to establish and develop a Transit Priority Area (TPA) with a Village community west of I-5 along Mission Bay Drive, a pedestrian/bicycle walk bridge across I-5 from the Bunker Hill/Magnolia Streets to the Balboa Station was always an integral element of that plan. It was going to be financed with developer fees. Now the PEIR refers to it only as a broken line diagram that could be realized by "supporting" SANDAG and MTS to consider funding it. There has been no explanation for this turnabout and possible elimination of this walk bridge.

Without a walk bridge spanning across I-5 from the Bunker Hill/Magnolia Street area to the Balboa Station, it is questionable whether much of the proposed TPA is within 1/2 mile walking distance of the Station, and may be out of legal compliance for development. In Section 7.1 of the BSASP, Transit Priority Area (TPA) is defined as an area within 1/2 mile walking distance of a major transit stop. I believe the distance should be measured on foot just as someone would need to walk from the boarding area at the future Balboa Station north on Morena over Balboa Ave, down the spiral ramp (count elevation distance), west on Balboa/Garnet and then south on Mission Bay Drive. And when 1/2 mile has been reached, that should be the southern (and western?) boundary for the TPA. (I very loosely clocked the distance with my car on the roadways and at Bunker Hill Drive my mileage gauge recorded .9 miles.)

Much of the proposed development of up to 4,729 dwelling units may not qualify for special exemptions such as parking and environmental regulations, high density development and developer incentives under SB743 and other related legal authority. It appears the intent of SB743 and previous and subsequent legislation is to decrease greenhouse gas emissions (GHGs) by providing additional needed housing next to transit stops so that residents can easily access reliable and frequent public transportation that

AT-1 The Balboa Avenue Station Area Specific Plan (BASASP) includes a policy to support the San Diego Association of Governments (SANDAG) and the San Diego Metropolitan Transit System (MTS) to consider a bicycle and pedestrian access via a connection across Interstate 5 from the Balboa Avenue Trolley Station to the area east of Mission Bay Drive within the vicinity of Magnolia Avenue and Bunker Hill Street. This connection could include a bridge, aerial skyway, or other means with potential connections to Mission Bay Park and Mission Boulevard. Identification of funding sources and implementation of the facility would require further coordination by SANDAG and MTS.

The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared use paths along Garnet Avenue and Mission Bay Drive, as well as modifications at intersections to improve pedestrian mobility by reducing crossing distances. Bicycle improvements are identified in Section 3.3 and include a variety of facilities within the area for bicyclists of different abilities.

AT-1

COMMENTS

RESPONSES

AT-1 (cont.)	<p>Donna Regalado 6/12/18</p> <p>they can walk or bike to without using or needing cars. This is also a goal for the City of San Diego's Climate Action Plan.</p> <p>Further impediments to reaching the Balboa Station from the proposed TPA area are the elevation, and the proposed switchback ramp (imagine someone in a wheelchair trying to push himself up that steep spiral incline).</p> <p>Another impediment is the narrow walk shed under the I-5 bridge. Michael Prinz did suggest at one point during this process that it looked like the footing under the I-5 bridge could be dug into in order to widen this walkway with tunnels and lighting. But this PEIR now only suggests that MTS and SANDAG be "supported" to identify funding for this. Once again, there is no explanation for this change in direction. I believe that routing all the foot and bicycle traffic for the Balboa Station from the TPA on to these sidewalks may be putting people at risk as there is no barrier from the busy Balboa Avenue traffic.</p> <p>Additional Comments:</p> <p>B. Section 2.1.8. The Transit Priority Area should include housing for the homeless (Housing First), especially since that population is least likely to own/drive cars.</p> <p>C. Section 3.1. designates sidewalks only on the east and west sides of Morena south of Balboa, yet in meeting discussions it was agreed sidewalks would also be created on both north and south sides of Balboa from Clairemont Drive. At the very least, sidewalks need to be funded by the City east to Moraga Ave, both sides, and preferably on Morena north of the Station to Avati Drive.</p> <p>D. Figure 3.7 Keep Morena Blvd south of Balboa as a 4-lane road for vehicle traffic. Throughout the construction these past few years for the Trolley station, local residents have experienced first-hand the impediments to traffic flow, as well as the air pollution and Greenhouse Gas Emissions due to reducing this roadway to one lane southbound. Claudia Brizuela has assured us at all the meetings she attended that this lane reduction was only temporary until the construction is completed. And now the PEIR is proposing it as permanent without any offer of explanation for the turnabout. This element is another example showing that the City is not acting in good faith, and never intended to incorporate community input in the planning process.</p> <p>E. Sections 3.1-3. "Support removal of free-right movements at intersections with Morena Blvd." Why? By eliminating right turns on red you are adding to the gridlock and delaying flow of traffic. Creating a plan that ensures gridlock is irresponsible and unprofessional. Sitting in traffic creates greenhouse gas emissions and affects people's health and sometimes longevity. It is a quality of life issue, since there is no significant proof that the City's Climate Action Plan is effective.</p> <p>F. Section 4.4.2. Street trees - The City should include funding for the replacement of the trees that were removed on Morena Blvd. for the construction of the Balboa Station. The subcommittee has been told that the trees that were removed from Morena Blvd due to the construction would be replaced. Funding should not be the responsibility of any other entities, such as the Balboa Improvement Plan or the CIP.</p>	<p>AT-2 The BASASP contains specific policies to provide a diversity of housing types and affordable housing.</p> <p>AT-3 This comment makes a recommendation about sidewalk locations but does not raise any environmental issues with respect to the adequacy of the Draft Program Environmental Impact Report (PEIR). No further response is required.</p> <p>AT-4 This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.</p> <p>AT-5 The BASASP recommends removal of free right turns at intersections where pedestrians, bicyclists, and vehicles are planned to interact to reduce potential conflict between these modes. Similar vehicle operations can be obtained along this corridor without free right movements as documented in the BASASP.</p> <p>AT-6 This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.</p>
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COMMENTS

RESPONSES

Donna Regalado

6/12/18

AT-7

G. Section 3.7. The goal of the city's CAP is to eliminate 1/2 of all Greenhouse Gas Emissions by 2035. Where is the quantifiable data and the benchmarks for success? What is the progress so far? Both SB 743 and Government Code Section 21099 (a) measure the success of a TPA by a reduction in greenhouse gas emissions as measured by Vehicle Miles Travelled. According to the PEIR, there will be no significant reduction in VMT as a result of this Balboa Station.

AT-8

Conclusion

Before submitting this EIR for signature, the City Planning Dept. must commit to a solid plan for a pedestrian/bike bridge across I-5 and secure funding for it. It must be documented in the EIR and BSASP. Without the pedestrian/bicycle bridge across I-5 to the Balboa Station, the Balboa Station Area Specific Plan will be a failure. It will increase traffic congestion - gridlock- and Greenhouse Gas Emissions and make traveling to the station by foot/bicycle a dangerous path for the people coming from west of I-5. More cars and people sitting in traffic will be breathing polluted air. There is nothing about this plan as demonstrated in the PEIR that will encourage people to use fewer autos and the trolley more. In fact, with the addition of up to approximately 4729 dwelling units with inadequate parking, the congestion will be unbearable not only for the residents surrounding the area, but for tourists, as well as residents who live inland and want to take the trolley to the beach area. Everyone flocks to the beach in the summertime and Pacific Beach and Mission Beach are arguably the most popular beaches in San Diego. Approval of this EIR will degrade the quality of life for everyone in the area. SANDAG has said that impacts to alternative transportation mode trips under BSASP would be less than significant, and few riders will walk or bike. Instead, they will drive to the station if they want to take the trolley, where the parking spaces will be woefully inadequate.

AT-9

In addition, the City of San Diego, by authorizing development outside of the 1/2 mile walking distance to the Station area, may be opening itself and the developers up for possible litigation if the developers are granted incentives for building within the TPA, yet are not within 1/2 mile walking distance. Litigation costs taxpayers money which could instead be used toward the bridge. If the City does not include the bridge across I-5, then they should not authorize any development that is not within 1/2 mile walking distance of the Balboa Station.

Please contact me if you have any questions and thank you for the opportunity to comment.

Sincerely,

Donna Regalado
4950 Della Place
San Diego, CA 92117
dgr27@sbcglobal.net

AT-7

As discussed in Section 5.6.4.2 of the PEIR, the BASASP would implement the City's Climate Action Plan (CAP) by focusing projected future growth into mixed-use and multiple-use activity centers that are pedestrian- and bicycle-friendly and linked to transit. While implementation of the BASASP would result in an increase in aggregated greenhouse gas (GHG) emissions compared to the emissions that would be generated under the adopted Community Plans, a decrease in GHG emissions, on a per capita basis would occur and the overall citywide GHG emissions per capita would decrease, consistent with the City's CAP targets for citywide GHG emissions reductions.

AT-8

The BASASP and the PEIR identify a future shared-use pedestrian and bicycle connection and as stated in Response AT-1, a policy is included in the BASASP to support implementation of this future facility. Without the connection, the walkshed (from the Balboa Avenue Trolley Station) would not be increased and remain as shown in PEIR Figure 5.15-1. This could potentially result in some additional traffic trips if people in the southern portion of the BASASP area choose to drive automobiles to access the Trolley Station; however, any additional trips would be negligible compared to the total trips generated by full implementation of the project and would not change the impact conclusions contained in the PEIR regarding traffic, air quality, and/or greenhouse gas emissions.

AT-9

This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.

BALBOA AVENUE STATION AREA SPECIFIC PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

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Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic/trips
AED	Automatic External Defibrillator
AF	acre feet
AGE	Allied Geotechnical Engineers, Inc.
a.m.	morning
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
AQIA	Air Quality Impact Assessment
ASCE	American Society of Civil Engineers
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BASASP	Balboa Avenue Station Area Specific Plan
Basin Plan	Water Quality Control Plan for the San Diego Basin
BAT	best available technology
BCT	best conventional technology
Bgs	below ground surface
BLTS	Bicycle Level of Traffic Stress
BMPs	best management practices
BMP	Bicycle Master Plan
BNSF	Burlington Northern and Santa Fe
B.P.	Before Present
BRT	bus rapid transit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CAT	Climate Action Team
CBC	California Building Code
CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDC	California Department of Conservation

CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEC	California Energy Commission
CED	California Energy Demand
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERS	California Environmental Reporting System
CEUS	Commercial End Use Survey
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH ₄	methane
CHL	California Historical Landmarks
CHP	California Highway Patrol
CHSC	California Health and Safety Code
CHSP	Community Health and Safety Plan
City	City of San Diego
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
County	County of San Diego
CPA	Community Plan Amendment
CPUC	California Public Utilities Commission
CRC	California Residential Code
CRHR	California Register of Historic Resources
CSMP	Construction Site Monitoring Program
CT	Census Tract
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel(s)
dBA	A-weighted decibels
DEH	Department of Environmental Health
DIF	Development Impact Fee
DOE	Department of Energy
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EB	eastbound
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EMT	emergency medical technician
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPCA	Energy Policy and Conservation Act

ESA	Endangered Species Act
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
FAR	floor-area-ratio
FBFM	Flood Boundary & Floodway Map
FEMA	Federal Emergency Management Agency
FHBM	Flood Hazard Boundary Map
FIRM	Flood Insurance Rate Map
FP	Flood Plain
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
FW	Flood Way
FY	Fiscal Year
General Plan	City of San Diego General Plan
GHG	greenhouse gas
H ₂ S	hydrogen sulfide
HA	Hydrologic Area
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HELIX	HELIX Environmental Planning, Inc.
HFCs	hydrofluorocarbons
HMD	Hazardous Materials Division
HMBP	Hazardous Materials Business Plan
HRG	Historical Resources Guidelines
HRR	Historical Resource Regulations
HRS	Hazard Ranking System
HU	Hydrologic Unit
HVAC	heating, ventilation and air conditioning
I-5	Interstate 5
IBC	International Building Code
IFS	Impact Fee Study
ITP	Incidental Take Permit
IWRP	Integrated Water Resources Plan
JRMP	Jurisdictional Runoff Management Plan
kBTU	thousand British thermal units
km	kilometer
kWh	kilowatt hours

LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LDC	Land Development Code
LDM	Land Development Manual
L _{DN}	Day-Night Sound Level 24-hour average
LEA	Local Enforcement Agency
L _{EQ}	time-averaged noise level
LID	low impact development
LOS	Level of Service
LOSSAN	Los Angeles-San Diego-San Luis Obispo
LRA	Local responsibility area
LRT	light rail transit
LTCP	Low-Threat Closure Policy
LTPP	Long-Term Procurement Plan
LTS	level of traffic stress
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
Mgd	million gallons per day
mg/m ³	milligram per cubic meter
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
MMRP	Mitigation Monitoring and Reporting Program
MT	metric tons
MOE	measure of effectiveness
MOU	Memorandum of Understanding
mpg	miles per gallon
mph	miles per hour
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MMT	million metric tons
MTS	Metropolitan Transit System
MW	megawatts
MWD	Metropolitan Water District of Southern California
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAGPRA	Native American Graves Protection and Repatriation Act of 1990
NB	northbound
NCCP	Natural Communities Conservation Planning
NCHRP	National Cooperative Highway Research Program
NCTD	North County Transit District
NDS	National Data and Surveying Service
NE	Narrow Endemic
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association

NHTSA	National Highway Traffic Safety Administration
NO	nitrogen oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRHP	National Register of Historic Places
NSLUs	Noise-sensitive land uses
O ₃	ozone
OES	Office of Emergency Services
OTL	over-the-line
Pb	lead
PCB	polychlorinated biphenyl
PEIR	Program Environmental Impact Report
PEQE	Pedestrian Environment Quality Evaluation
PFCs	perfluorocarbons
p.m.	afternoon
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PUD	Public Utilities Department
PVC	Polyvinyl chloride
RAQS	Regional Air Quality Strategy
RAP	Revitalization Action Program
RASS	Residential Appliance Saturation Survey
RBP	Regional Bike Plan
RCFZ	Rose Canyon Fault Zone
RCP	Regional Comprehensive Plan
REAP	Rain Event Action Plan
RES	Regional Energy Strategy
RMP	Risk Management Plan
ROW	Right-of-way
RPS	renewable portfolio standard
RTP	Regional Transportation Plan
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Management
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill / southbound
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center

SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDFD	San Diego Fire Department
SDG&E	San Diego Gas and Electric
SD-OHS	San Diego Office of Homeland Security
SDPD	San Diego Police Department
SDUSD	San Diego Unified School District
SF	square foot/feet
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SGMP	Soil and Groundwater Management Plan
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	oxides of sulfur
SRA	State responsibility area
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
T-BACT	Toxics Best Available Control Technology
TIS	Traffic Impact Study
TMDL	Total Maximum Daily Load
TOD	Transit-oriented development
TPA	Transit Priority Area
T&SWD	Transportation and Storm Water Department
UBC	Uniform Building Code
UWMP	Urban Water Management Plan
USACE	United States Army Corps of Engineers
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
V/C	volume-to-capacity ratio
VMT	vehicle miles traveled
VOC	volatile organic compound
WB	westbound
WDR	Waste Discharge Requirement
WLA	waste load allocation
WMA	Watershed Management Area
WMP	Waste Management Plan
WQBEL	water quality based effluent limitations

WQIP	Water Quality Improvement Plan
WRCC	Western Regional Climate Center
WSA	Water Supply Assessment
$\mu\text{g}/\text{m}^3$	microgram per cubic meter

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EXECUTIVE SUMMARY

This summary provides a brief description of the proposed Balboa Avenue Station Area Specific Plan (“proposed project” or “BASASP”) as well as a summary of the environmental analysis and alternatives that were considered in this Program Environmental Impact Report (PEIR). The PEIR has been prepared by the City of San Diego (City) in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and the California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City’s *Environmental Impact Report Guidelines* (City 2005) and the *CEQA Significance Determination Thresholds* (City 2016a).

The summary does not contain the extensive background and analysis found in the document. Therefore, the reader should review the entire document to better and more fully understand the proposed project and its potential environmental consequences.

ES.1 PROPOSED PROJECT

ES.1.1 Project Location and Setting

The BASASP area encompasses approximately 210 acres (0.33 square miles) and is located in the communities of Pacific Beach and Clairemont Mesa. Rose Creek borders the western part of the BASASP area. Interstate 5 (I-5) runs north-south through the middle of the BASASP area and is the boundary between the Pacific Beach community on the west side and the Clairemont Mesa community on the east side. The BASASP area is predominantly urbanized and developed with commercial, industrial, and residential uses, and also includes open space and regional transportation facilities.

Major regional transportation corridors bisect the BASASP area, including I-5 and the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor. The LOSSAN rail corridor generally runs parallel to the east side of I-5. The Mid-Coast Trolley, which consists of the San Diego Metropolitan Transit System (MTS) Blue Line Trolley line extension will also traverse the BASASP area along the east side of the existing tracks within the LOSSAN rail corridor. A new trolley station, the Balboa Avenue Station, will be constructed as part of the new Blue Line Trolley extension adjacent to the east side of the rail corridor and south of Balboa Avenue.

The portion of the BASASP area south of Garnet Avenue and west of the LOSSAN railroad right-of-way (ROW) is located within the Coastal Overlay Zone. Additionally, the City’s Multi-Habitat Planning Area (MHPA) lands are located along a portion of Rose Creek, both within and adjacent to the BASASP area.

ES.1.2 Project Description

The proposed BASASP is a Specific Plan that would amend the Pacific Beach Community Plan/Local Coastal Program (LCP) to revise figures and text to be consistent with the proposed land use and mobility recommendations of the BASASP. The proposed Community Plan Amendment for Pacific Beach would redesignate and rezone lands within the BASASP area to encourage and allow for

public and private transit-oriented development (TOD) in the vicinity of the Balboa Avenue Station. The BASASP would also provide recommendations and guidelines for the public ROW that would emphasize access to the Balboa Avenue Station and would capitalize on the new regional transit connection in the BASASP area. The proposed BASASP promotes increasing mobility options, decreasing dependency on single occupancy vehicles, and reducing traffic congestion at local intersections and roadways. The Clairemont Mesa Community Plan would also be amended to revise figures and text within the Community Plan to be consistent with the proposed mobility recommendations of the BASASP. The BASASP would not redesignate or rezone any property within the Clairemont Mesa planning area.

The proposed BASASP is intended to further express General Plan and Community Plan policies within the Pacific Beach and Clairemont Mesa communities through the provision of area-specific recommendations that would implement citywide goals and policies by allowing for TOD and multi-modal improvements. The BASASP contains the following six chapters: Land Use; Mobility; Urban Design; Recreation; Infrastructure and Public Utilities; and Conservation. The BASASP also contains an Implementation chapter. Each of these chapters identifies policies intended to guide future development within the BASASP area.

The BASASP proposes two new land use designations: Residential (15 to 54 dwelling units per acre [du/ac]) and Community Village (0 to 73 du/ac and 0 to 109 du/ac), and two consistent with the adopted Pacific Beach Community Plan: Light Industrial, and Flood Control/Open Space. The proposed project would include a corresponding rezone of the properties within the BASASP area for consistency with the land use designations. The Community Village land use designation, which allows for high-density housing (up to 73 du/ac) in a mixed-use setting, would primarily be applied to lands that front Mission Bay Drive and Garnet Avenue. Higher intensity, infill mixed-use development (up to 109 du/ac) under the Community Village designation would be focused between Bunker Hill Street and Rosewood Street. The area designated Residential is generally bounded by Rose Creek on the west, Figueroa Boulevard on the east and north, and Grand Avenue on the south.

The proposed BASASP would allow up to 4,729 residential units, including 895 multi-family and two single-family dwelling units within the residentially-designated areas and up to 3,832 multi-family residential units within the Community Village designation. In addition, up to ~~669,800~~ 614,313 square feet (SF) of commercial retail uses and ~~423,500~~ 423,444 SF of industrial uses could be developed within the BASASP area. An active commercial frontage is proposed along the main roadways in the BASASP area. Much of the BASASP area would be designated for Community Village, while the balance of the land area would be for residential and light industrial use. Open space is provided within Rose Creek. The proposed BASASP also identifies multi-modal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station.

In addition to City Council adoption of the proposed BASASP and certification of the PEIR, the project includes the following discretionary actions: an amendment to the Pacific Beach Community Plan/LCP and approval of the proposed rezone.

ES.2 PROJECT OBJECTIVES

The following objectives for the proposed BASASP support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this

PEIR, and will ultimately aid the City in preparing findings and overriding considerations, if necessary:

- Establish a TOD village that capitalizes on the trolley station investment by the San Diego Association of Governments (SANDAG) and MTS;
- Provide a plan that allows for a mix of land uses that serves residents, generates economic prosperity, and capitalizes on visitor traffic;
- Establish a plan that encourages high density residential or mixed-use development; higher intensity employment areas, and activity centers within walking or biking distance of transit corridors and the trolley station;
- Increase the supply and variety of housing types -- affordable for people of all ages and income levels -- in areas with frequent transit service and with access to a variety of services;
- Focus development in an area where there is available public infrastructure and transit;
- Increase mobility for pedestrians, cyclists, transit users, and automobiles through improved linkages at key points, with a strong pedestrian focus;
- Identify key mobility improvements to facilitate connections within and through the BASASP area, as well as to surrounding areas.
- Identify design criteria for urban public spaces, such as mini-parks, plazas, promenades, and venues that support a variety of events and gatherings;
- Expand access to park and recreation facilities within and adjacent to the BASASP area, including trail options and joint use opportunities, to promote a healthy, active community;
- Incorporate sustainability practices, policies, and design features into projects within the BASASP area that reduce greenhouse gas (GHG) emissions; and
- Craft a clear and practical implementation strategy for properties and improvements within the BASASP area.

ES.3 AREAS OF CONTROVERSY

The Notice of Preparation (NOP) was distributed on July 5, 2017 for a 30-day public review and comment period, and a public scoping meeting was held on July 18, 2017. Public comments were received on the NOP, and comments from the scoping meeting reflect controversy related to several environmental issues. The NOP, comment letters, and public scoping meeting transcript are included in this PEIR as Appendix A.

A total of 18 letters were received during the NOP period, including two letters from state agencies (California Department of Transportation [Caltrans] and Native American Heritage Commission [NAHC]), one letter from a regional agency (San Diego Association of Governments [SANDAG]), two letters from Native American tribal governments (Viejas Band of Kumeyaay Indians and Rincon Band

of Luiseño Indians), one letter from a citizen group (San Diego County Archaeological Society), one letter from a utility provider (San Diego Gas and Electric [SDG&E]) and 11 letters from members of the public (Carolyn Chase, Janet Podney, Peter Ward, Robert Lee, Donna Regalado, Karin Zirk, Ed Gallagher, Steve Pruett, Judy Pruett, Joe Steinbach, and Robert Little).

Issues of controversy raised in response to the NOP include concerns related to traffic, multi-modal transportation and connections, land use and smart growth, historical and tribal cultural resources, public utilities, air quality, GHG emissions, noise, lighting, cumulative impacts, biological resources, and alternatives.

ES.4 ISSUES TO BE RESOLVED BY THE DECISION-MAKING BODY

The City Council must review the proposed BASASP and this PEIR and determine if implementation of the proposed BASASP or one of the alternatives presented in Chapter 10.0, *Alternatives*, should be adopted. If the proposed project is selected for adoption, the City Council will be required to certify the Final PEIR, determine whether and how to mitigate significant impacts, and adopt associated Findings pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the PEIR:

- Air Quality;
- Biological Resources;
- Historical and Tribal Cultural Resources;
- Noise;
- Paleontological Resources; and
- Transportation/Circulation.

Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be significant and unmitigable, comprised of air quality (air quality plan consistency, construction and operations air emissions, and cumulative air emissions), cumulative transportation/circulation (impacts to roadway segments, intersections, and freeway facilities), historical and tribal cultural resources, noise (vibration and construction noise), and paleontological resources (ministerial projects).

ES.5 SUMMARY OF SIGNIFICANT EFFECTS AND MITIGATION MEASURES THAT REDUCE OR AVOID THE SIGNIFICANT EFFECTS

Table ES-1, *Summary of Significant Impacts and Proposed Mitigation*, summarizes the results of the environmental analysis completed for the proposed BASASP as analyzed in Chapter 5.0, *Environmental Analysis*, and Chapter 9.0, *Significant and Unavoidable Impacts/Significant Irreversible Environmental Impacts*. Table ES-1 identifies the significant impacts associated with the proposed project, includes mitigation measures to reduce and/or avoid significant environmental effects, and concludes if the impact would be mitigated to a level below significance with implementation of mitigation measures.

ES.6 PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives. In addition, CEQA requires the inclusion of a No Project Alternative. Pursuant to the CEQA Guidelines, a No Project Alternative must be considered which analyzes the environmental effects of what would be “reasonably expected to occur on the property in the foreseeable future, if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

In addition to the proposed BASASP, the PEIR in Chapter 10.0 addresses the following alternatives per the above noted CEQA requirements: the No Project Alternative: Adopted Community Plan and the Medium Density Alternative. These alternatives are summarized below and evaluated in full in Chapter 10.0 of this document. A summary comparison of the impacts associated with the proposed BASASP with the project alternatives is included in Table ES-2, *Comparison of Project and Alternative Impacts*.

ES.6.1 No Project Alternative: Adopted Community Plans

Under the No Project Alternative, development would continue to comply with the Adopted Community Plans (i.e., the Pacific Beach Community Plan and the Clairemont Mesa Community Plan). The Pacific Beach Community Plan and the Clairemont Community Plan would not be amended nor would the underlying zones be changed, as compared to the proposed BASASP. Development in accordance with the Adopted Community Plan would not include the BASASP's village concept, wherein mixed-use development would enable the integration of commercial and residential uses nor would it direct new high-density development to the areas near the trolley station at Balboa Avenue. In addition, the No Project Alternative would not ~~include~~embrace the multi-modal transportation network ~~that would be established by improvements identified by~~ the specific proposals contained in the Mobility chapter of the proposed BASASP. This alternative would be expected to result in fewer residential units than the proposed BASASP. Specifically, a total of 1,221 dwelling units would be expected at buildout under the adopted Pacific Beach Community Plan, compared to 4,729 dwelling units for the proposed BASASP.

ES.6.2 Medium Density Alternative

The Medium Density Alternative would be focused on reducing traffic and related impacts associated with traffic in comparison to the proposed BASASP. Reductions in traffic would be accomplished by reducing the number of residential units allowed within the BASASP area. This would be accomplished by adopting the lower density category of the Community Village (0-73 du/ac) land use designation across the area situated between Bunker Hill Street and Rosewood Street, as compared to the Community Village (0-109 du/ac) designation proposed by the BASASP, and maintaining the current adopted community plan density range (15-29 du/ac) for the land

designated Residential bounded by Rose Creek on the west, Figueroa Boulevard on the east and north, and Grand Avenue on the south. To reduce the number of residential units, the Medium Density Alternative would eliminate the emphasis placed on increasing residential densities in land designated Residential in the western residential area and would not include the higher density Community Village designation that allows up to 109 du/ac, thereby eliminating the additional 562 residential units proposed in the ~~community village designation under the proposed BASASP~~. All other elements of the proposed BASASP would remain the same under this alternative and an amendment to the Pacific Beach Community Plan and rezone would still be required to implement the land use changes associated with this alternative.

ES.6.3 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines requires an EIR to identify the environmentally superior alternative. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, another environmentally superior alternative must be identified.

Based on a comparison of the alternatives' overall environmental impacts (refer to Table ES-2) and their compatibility with the BASASP's goals and objectives, the No Project Alternative is the environmental superior alternative for this PEIR since overall development would be less than any of the other alternatives. The No Project Alternative does not meet the purpose and objectives of the proposed BASASP, however, including identifying land use and mobility strategies to cohesively guide growth and development and foster walkable and transit-oriented communities.

Therefore, the environmentally superior alternative is the Medium Density Alternative. This alternative would reduce cumulatively significant and unavoidable impacts to transportation/circulation (intersections). The Medium Density Alternative would also result in similar or reduced impact levels for issue areas determined to be significant under the proposed BASASP, including air quality, biological resources, historical and tribal cultural resources, noise, and paleontological resources. As described for the proposed BASASP, this alternative would have cumulatively significant and unavoidable impacts related to air quality, historical and tribal cultural resources, paleontological resources, and transportation/circulation.

**Table ES-1
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION**

Environmental Issue	Impact	Mitigation	Significance After Mitigation
AIR QUALITY			
Conformance to the Regional Air Quality Strategy: <i>Would the proposed BASASP conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP?</i>	The BASASP proposes an increase in density and vehicle trips beyond what was included for the area in the RAQS; impacts associated with conformance to regional air quality plans would be potentially significant.	Mitigation Measure AQ-1, as identified in Section 5.2, <i>Air Quality</i> .	Significant and unavoidable until the anticipated growth is included in the emissions estimates of the RAQS and the SIP.
Conformance to Federal and State Ambient Air Quality Standards: <i>Would the proposed BASASP result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?</i> Cumulatively Considerable Net Increase of Criteria Pollutants: <i>Would the proposed BASASP result in a cumulatively considerable net increase of a criteria pollutant for which the SDAB is in nonattainment of NAAQS or CAAQS?</i>	Criteria air pollutants generated during construction and operation of new development pursuant to the proposed BASASP could produce pollutants that would exceed State and federal requirements, resulting in potentially significant air quality impacts.	Mitigation Measures AQ-2, AQ-3, and AQ-4, as identified in Section 5.2, <i>Air Quality</i> .	Significant and unavoidable
BIOLOGICAL RESOURCES			
Sensitive Species: <i>Would the proposed BASASP result in substantial adverse impacts, either directly or through habitat modifications, to any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS?</i>	Implementation of the proposed BASASP has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent to sensitive habitat. Potential impacts to federal or State listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List would be significant.	Mitigation Measures BIO-1 through BIO-5, as identified in Section 5.3, <i>Biological Resources</i> .	Less than significant

Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
BIOLOGICAL RESOURCES (cont.)			
Sensitive Habitats: <i>Would the proposed BASASP result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB habitats as identified in the Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?</i>	Implementation of the proposed BASASP could potentially impact sensitive upland vegetation communities.	Mitigation Measure BIO-6, as identified in Section 5.3, <i>Biological Resources</i> .	Less than significant
Wetlands: <i>Would the proposed BASASP result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pools, riparian areas, etc.) through direct removal, filling, hydrological interruption, or other means?</i>	No impacts to wetlands are anticipated to occur with implementation of the proposed BASASP because areas containing potential jurisdictional waters would be avoided.	Mitigation Measures BIO-7 and BIO-8, as identified in Section 5.3, <i>Biological Resources</i> .	Less than significant
Conservation Planning: <i>Would the proposed BASASP conflict with the provisions of an adopted HCP or other approved local, regional, or state HCP, either within the MSCP Plan area or in the surrounding region?</i> Edge Effects: <i>Would the proposed BASASP introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?</i> Introduction of Invasive Species: <i>Would the proposed BASASP introduce invasive species of plants into a natural open space area?</i>	Implementation of the proposed BASASP may introduce new land uses adjacent to the MHPA. Future development projects implemented under the proposed BASASP could result in potentially significant indirect impacts and/or edge effects to MHPA lands.	Mitigation Measure BIO-9, as identified in Section 5.3, <i>Biological Resources</i> .	Less than significant

Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
HISTORICAL AND TRIBAL CULTURAL RESOURCES			
Historic Buildings, Structures, Objects, or Sites: <i>Would the proposed BASASP result in the alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, or object or site?</i>	Future development pursuant to the proposed BASASP could have a significant impact on important historic resources including, but not limited to, Trade Winds Motel Sign or Chase Bank building.	Mitigation Measures HIST-1, as identified in Section 5.7, <i>Historical and Tribal Cultural Resources</i> .	Significant and unavoidable
Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains: <i>Would the proposed BASASP result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?</i>	Given the presence of known and potential historical and archeological resources within the community, future development under the proposed BASASP has the potential to result in significant impacts to prehistoric or historic archaeological resources, sacred sites, and human remains, including, but not limited to, areas within and/or in proximity to the village of La Rinconada de Jamo.	Mitigation Measures HIST-2, as identified in Section 5.7, <i>Historical and Tribal Cultural Resources</i> .	Significant and unavoidable
Tribal Cultural Resources: <i>Would the proposed BASASP result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>	Given the presence of known and potential tribal cultural resources within and immediately adjacent to the BASASP, future development pursuant to the proposed BASASP could potentially result in a significant impact on tribal cultural resources.	Mitigation Measures HIST-2, as identified in Section 5.7, <i>Historical and Tribal Cultural Resources</i> .	Significant and unavoidable

Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
HISTORICAL AND TRIBAL CULTURAL RESOURCES (cont.)			
<ol style="list-style-type: none"> 1. <i>Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,</i> 2. <i>A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</i> 			
NOISE			
Compatibility of Proposed Land Uses with City Noise Guidelines: <i>Would the proposed BASASP result in the exposure of people to noise levels which exceed the City's adopted Noise Ordinance, the City's CEQA Significance Determination Thresholds, and/or standards established in an adopted Airport Land Use Compatibility Plan?</i>	Implementation of the proposed project would potentially expose new development to noise levels at exterior use areas or interior areas in excess of the Land Use – Noise Compatibility Guidelines established in the City's Noise Element, which would result in an inconsistency with City standards and a potentially significant noise impact.	Mitigation Measure NOI-1, as identified in Section 5.10, <u>Noise, as well as compliance with Section 1207.4 of Title 24, California Code of Regulations.</u>	Less than significant

Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
NOISE (cont.)			
Ground-borne Vibration: <i>Would the proposed BASASP expose persons to or generate excessive ground-borne vibration?</i>	New development proposed within the screening distance of the tracks and development proposing vibratory construction equipment would require further analysis to determine impacts to vibration-sensitive land uses. Impacts due to ground-borne vibration could be potentially significant.	Mitigation Measures NOI-2 and NOI-3, as identified in Section 5.10, <i>Noise</i> .	Significant and unavoidable
Construction Noise: <i>Would the proposed BASASP result in temporary construction noise in excess of the City's Noise Ordinance?</i>	Future infill projects, such as those allowed under the BASASP, may be located in close proximity to existing and future noise-sensitive land uses. Construction activities related to implementation of the BASASP would potentially generate short-term noise levels in excess of 75 dBA L _{EQ} (12 hour) at adjacent properties.	Mitigation Measures NOI-4, as identified in Section 5.10, <i>Noise</i> .	Significant and unavoidable
PALEONTOLOGICAL RESOURCES			
Paleontological Resources: <i>Would the proposed BASASP require over 1,000 cubic yards of excavation and more than 10 feet deep in a high resource potential geologic deposit/formation/rock unit, or over 2,000 cubic yards of excavation and more than 10 feet deep in a moderate resource potential geologic deposit/formation/rock unit?</i>	Based on the presence of formational units exhibiting high potential for the occurrence of sensitive paleontological resources in the BASASP area, potential impacts from future discretionary and ministerial projects within the BASASP area would be potentially significant.	Mitigation Measure PALEO-1, as identified in Section 5.11, <i>Paleontological Resources</i> .	Less than significant (discretionary development) Significant and unavoidable (ministerial development)

**Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION**

Environmental Issue	Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION			
Vehicular Traffic Circulation: <i>Would traffic associated with the proposed BASASP cause any roadway corridor (segments, intersections or freeways) to exceed the City's significance thresholds?</i>	<i>Roadway Segments</i>		
	Three consecutive segments of Garnet Avenue from Mission Bay Drive to Morena Boulevard SB Ramps	Mitigation Measure TRANS 5.15-1, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Cumulatively significant and unavoidable ¹
	Balboa Avenue east of Clairemont Drive	Mitigation Measure TRANS 5.15-2, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Cumulatively significant and unavoidable ¹
	Six consecutive segments of Mission Bay Drive from Bluffside Avenue to I-5 ramps	Mitigation Measure TRANS 5.15-3, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Cumulatively significant and unavoidable ¹
	Clairemont Drive from Denver Street to Morena Boulevard	Mitigation Measure TRANS 5.15-4, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Cumulatively significant and unavoidable ¹
	<i>Intersections</i>		
	Garnet Avenue at Olney Street	Mitigation Measure TRANS 5.15-5, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Less than significant
	Garnet Avenue at Mission Bay Drive	Mitigation Measure TRANS 5.15-6, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Less than significant
	Balboa Avenue at Morena Boulevard NB Ramps	Mitigation Measure TRANS 5.15-7, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Less than significant
	Balboa Avenue at Clairemont Drive	Mitigation Measure TRANS 5.15-8, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Cumulatively significant and unavoidable ¹
	Morena Boulevard at Jutland Drive	Mitigation Measure TRANS 5.15-9, as identified in Section 5.15, <i>Transportation/Circulation.</i>	Less than significant

Table ES-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION (cont.)			
Vehicular Traffic Circulation (cont.)	<i>Freeway Segments</i>		
	Four consecutive segments of I-5 from SR-52 to Clairemont Drive	Mitigation Measure TRANS 5.15-10, as identified in Section 5.15, <i>Transportation/Circulation</i> .	Cumulatively significant and unavoidable ²
	<i>Freeway Ramp Meters</i>		
	I-5 SB Mission Bay Drive on-ramp	Mitigation Measure TRANS 5.15-11, as identified in Section 5.15, <i>Transportation/Circulation</i> .	Cumulatively significant and unavoidable ²
	I-5 NB Mission Bay Drive on-ramp	Mitigation Measure TRANS 5.15-11, as identified in Section 5.15, <i>Transportation/Circulation</i> .	Cumulatively significant and unavoidable ²

- 1 While the identified mitigation measures would reduce impacts to less than significant, the impacts are considered significant and unavoidable because they are not proposed based on (a) Implementation of the improvements are contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; and/or (b) sufficient ROW does not exist to construct the improvements.
- 2 Impacts to Caltrans facilities would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur prior to the assumed buildout of 2035.

Table ES-2
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Notes							
LS = Less than significant		SU = Significant and unavoidable		= = equal to proposed project			
SM = Significant and mitigated		+ = more than proposed project		- = less than proposed project			
Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Air Quality	Regional Air Quality Plan Conformance	SU	SU	LS	LS	SU (-)	SU (-)
	Construction Emissions	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Operation Emissions	SU	SU	SU (-)	SU (-)	SU (-)	SU (-)
	Sensitive Receptors	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Odors	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
Biological Resources	Sensitive Species	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Sensitive Habitats	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Wetlands	LS	LS	SM	LS (=)	LS (=)	LS (=)
	Wildlife Movement	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Conservation Planning	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Edge Effects	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Policy Conformance	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Invasive Species	SM	LS	SM (=)	LS (=)	LS SM (=)	LS (=)
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Tribal Cultural Resources	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)

Table ES-2 (cont.)
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Noise	Regulatory Conformance	SM	LS	SM (=)	LS (=)	SM (-)	LS (=)
	Noise Levels	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Vibration	SU	LS	SU (-)	LS (-)	SU (-)	LS (-)
	Construction Noise	SU	LS	SU (=)	LS (=)	SU (=)	LS (=)
Paleontological Resources	Sensitive Formations	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
Transportation/ Circulation	Alternative Mode Trips	LS	LS	SU (+)	SU (+)	SU LS (+)	SU LS (+)
	Alternative Transportation	LS	LS	SU (+)	SU (+)	LS (-)	LS (-)
	Road Segments, Intersections, and Freeway Facilities	SU	SU	SU (+)	SU (+)	SU (-)	SU (-)

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1.0 INTRODUCTION

This Program Environmental Impact Report (PEIR) for the proposed Balboa Avenue Station Area Specific Plan (referred to throughout this PEIR as the “proposed project” or “BASASP”) has been prepared by the City of San Diego (City) in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and the California Code of Regulations [CCR], Title 14, Section 15000, et seq.) and in accordance with the City’s *Environmental Impact Report Guidelines* (City 2005) and the *CEQA Significance Determination Thresholds* (City 2016).

The proposed BASASP analyzed in this PEIR is a comprehensive planning document that provides the policy framework to guide transit-oriented public and private development and multi-modal improvements near the Balboa Avenue Trolley Station (herein referred to as the “Balboa Avenue Station”) consistent with the City’s General Plan City of Villages strategy. The proposed project provides recommendations and guidelines for new mixed-use development and improvements to the public right-of-way (ROW) to develop access to the Balboa Avenue Station to capitalize on the new regional transit connection in the area. It proposes to increase residential density by redesignating and rezoning lands, and promotes an increase in transportation choices thereby decreasing dependence on single-occupancy vehicles and reducing traffic congestion at local intersections and roadways. The BASASP contains the following six chapters: Land Use, Mobility, Urban Design, Recreation, Infrastructure and Public Utilities, and Conservation.

The BASASP area encompasses approximately 210 acres (0.33 square miles) and is located in the Pacific Beach and Clairemont Mesa community planning areas. Rose Creek borders the western part of the BASASP area. Interstate 5 (I-5) runs north-south through the middle of the BASASP area and is the boundary between the Pacific Beach community planning area on the west side and the Clairemont Mesa community planning area on the east side. Figure 1-1, *Regional Location Map*, depicts the general location of the BASASP area within the region, and Figure 1-2, *Project Location Map (Aerial Photograph)*, and Figure 1-3, *Project Location (USGS Topography)*, show the boundary of the BASASP area and vicinity.

The proposed project is intended to further express General Plan and Community Plan policies within the Pacific Beach and Clairemont Mesa communities through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide zoning.

In addition to City Council adoption of the BASASP, the proposed project also includes the following: a General Plan amendment, s-Community Plan Amendments (CPA) to figures and text in the Pacific Beach Community Plan and Local Coastal Program (LCP) and Clairemont Mesa Community Plan, and a rezone to be consistent with the BASASP. The Pacific Beach CPA would allow for implementation of the proposed mobility improvements, including street classifications and bicycle facilities, as well as the proposed increase in residential density. ~~A and a rezone is proposed in Pacific Beach to allow the zone be consistent with the new land use redesignations~~ and associated increased density. The Clairemont Mesa Community Plan figures and text would also be amended to be consistent with the proposed street classification changes and bicycle facility improvements identified in the BASASP. The BASASP would not redesignate or rezone any property within the Clairemont Mesa planning area.

1.1 Purpose and Intended Uses

1.1.1 Purpose of the PEIR

The purpose of this PEIR is to:

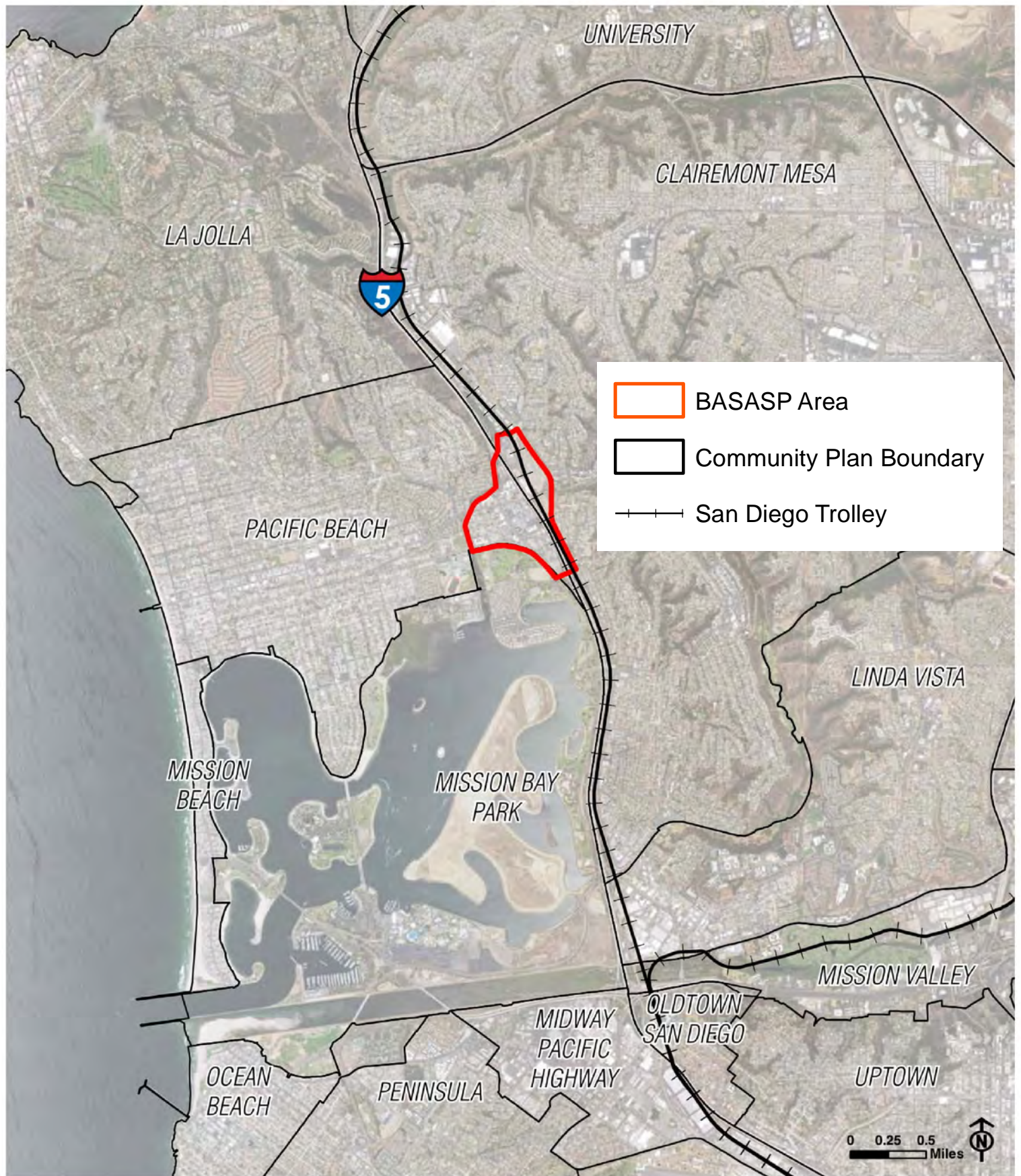
- Inform governmental decision makers and the general public of the potentially significant environmental effects of the proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Reduce environmental impacts by identifying changes in the proposed project through the use of alternatives or mitigation measures; and
- Streamline environmental review for subsequent projects consistent with the BASASP.

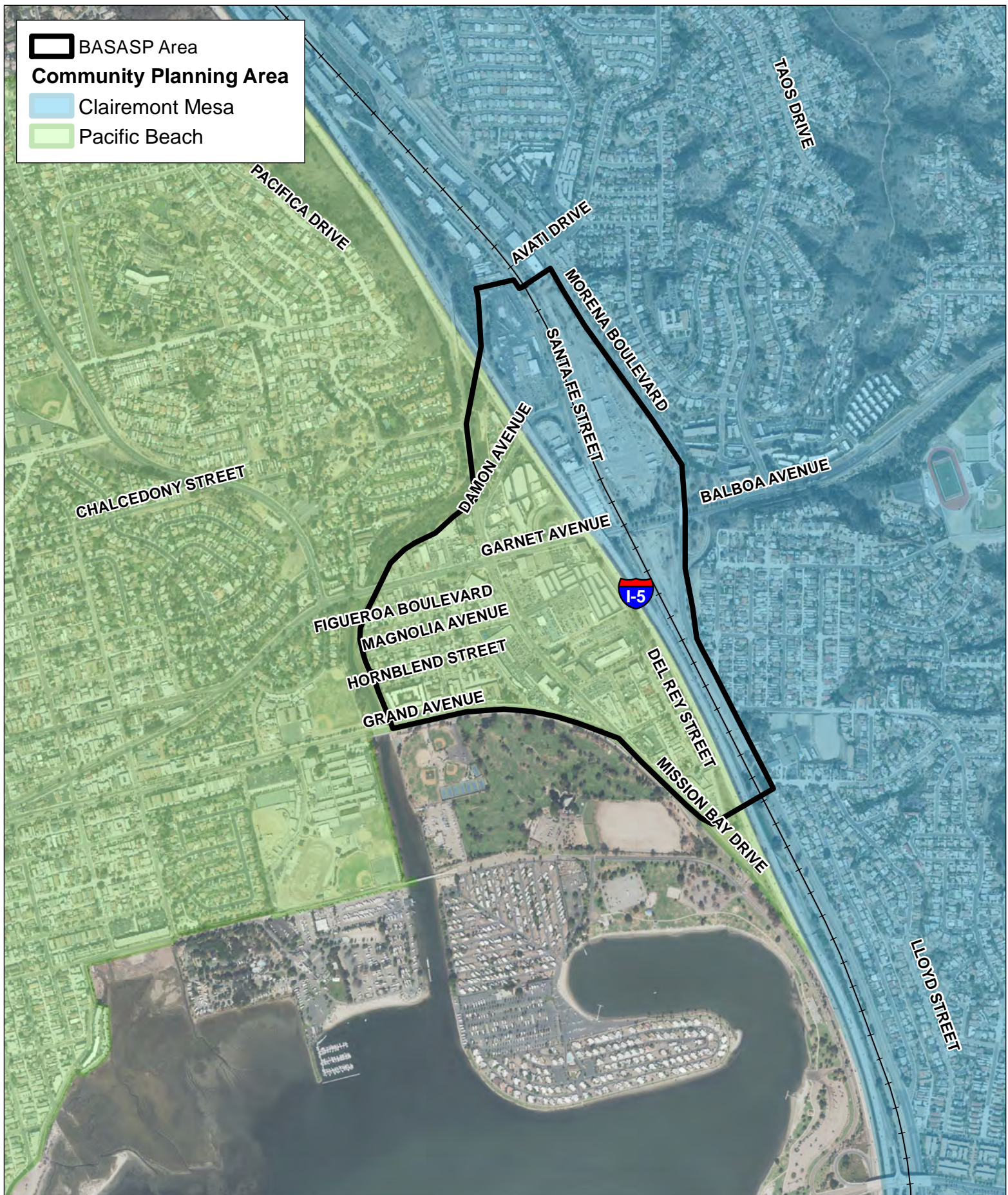
1.1.2 Intended Uses of the PEIR

This PEIR is informational in nature and is intended for use by decision-makers; Responsible or Trustee Agencies, as defined under CEQA; other interested agencies or jurisdictions; and the general public in evaluating the potential environmental effects, mitigation measures, and alternatives of the proposed project. By recognizing the environmental impacts of these actions, decision-makers will have a better understanding of the physical and environmental changes that would accompany their approval. This PEIR includes recommended mitigation measures which, when implemented, would provide ways to substantially lessen or avoid significant effects of the proposed project on the environment, whenever feasible. Alternatives to the proposed project are presented to evaluate alternative development scenarios that would further reduce or avoid significant impacts associated with the proposed project.

Implementation of the proposed project would require subsequent approval of public or private development proposals (referred to as “future development” in this PEIR) to carry out the land use plan and demonstrate compliance with policies presented in the BASASP. Development applications within the BASASP area would be evaluated for compliance with BASASP regulations and guidelines. Future development projects that are consistent with, and advance, the vision, goals, and policies of the BASASP and underlying zone would have the opportunity to process land use entitlements either ministerially or through a low-level discretionary process. This would reduce the time necessary to process entitlements and building permits within the BASASP area.

Should a project within the BASASP area require a discretionary action, Senate Bill 743 (SB 743) provides an exemption from environmental review under CEQA for development that is consistent with a specific plan and eliminates or reduces the need to evaluate aesthetic and parking impacts as part of the environmental review (see PRC Section 21155.4). Future projects that are consistent with the BASASP may be able to rely on this exemption if a development meets all of the following criteria:



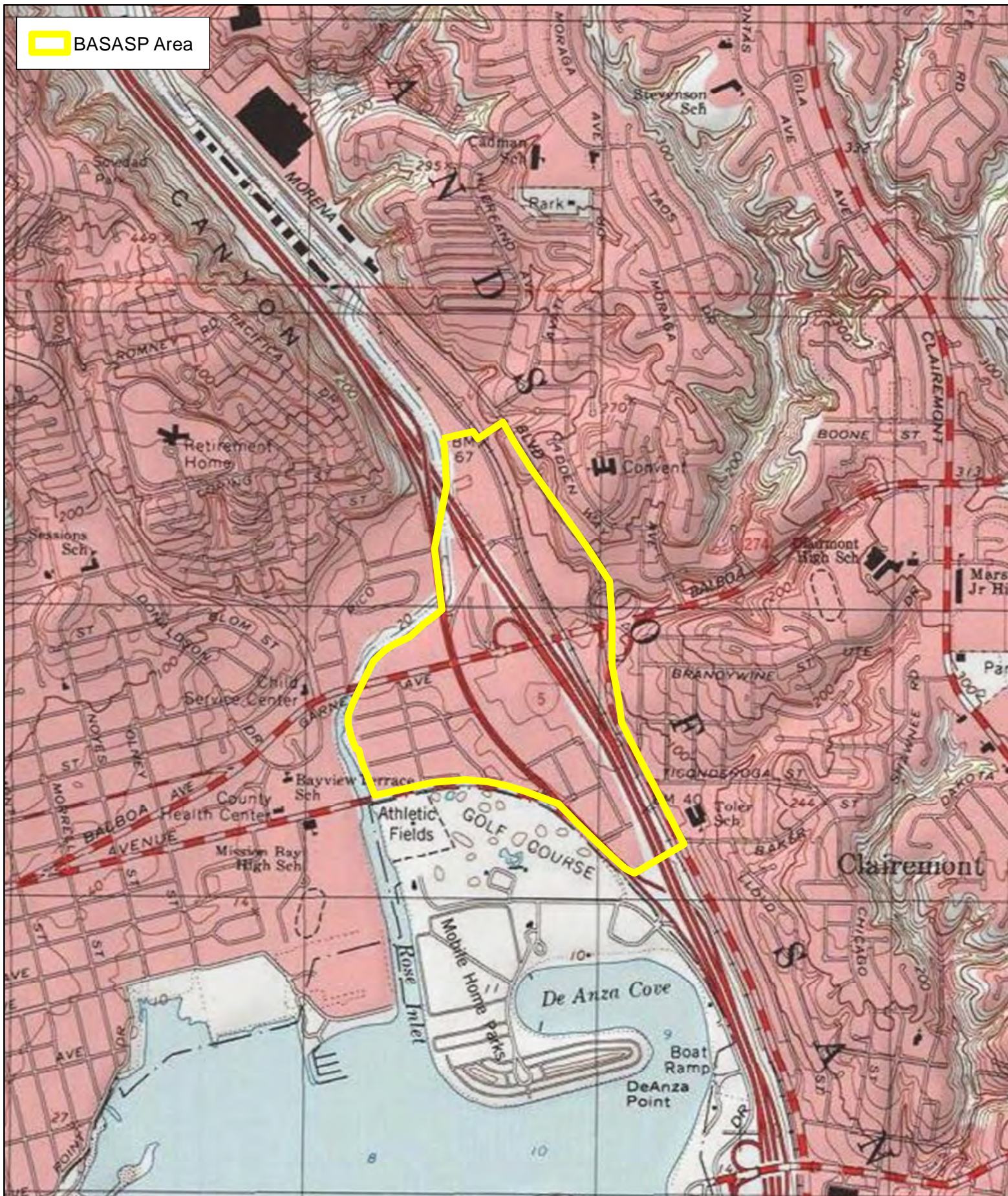


Balboa Avenue Station Area Specific Plan

**Project Location Map
(Aerial Photograph)**

Figure 1-2

 BASASP Area



Balboa Avenue Station Area Specific Plan

**Project Location
(USGS Topography)**

0 0.25 0.5
Miles



Figure 1-3

- The project is a residential, employment center, or mixed-use project;
- The project is located within a Transit Priority Area (TPA);
- The project is consistent with a specific plan for which an EIR was certified; and
- The project is consistent with an adopted sustainable communities strategy or alternative planning strategy.

The City will conduct an Initial Study or other equivalent analysis for each subsequent project to determine if that subsequent project would meet these criteria for a CEQA exemption. If the analysis finds that the subsequent project meets these criteria, the City must further determine if any of the conditions specified in PRC Section 21166 would occur, including:

- Substantial changes are proposed in the project which will require major revisions of the EIR;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions of the EIR; or
- New information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available.

Further environmental review would be conducted only if any of these conditions would occur as a result of the implementation of the subsequent development project.

1.2 Legal Authority

1.2.1 Lead Agency

The City is the Lead Agency for the proposed project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency which has the principal responsibility for carrying out or approving a project. As the Lead Agency, the City's Planning Department, Environment and Mobility Planning Division, conducted an environmental review of the project and determined that a PEIR was required. The analysis and findings in this document reflect the independent judgment of the City.

1.2.2 Responsible and Trustee Agencies

Implementation of the proposed project may require subsequent actions involving Responsible and Trustee Agencies. Responsible Agencies, as defined by CEQA Guidelines Section 15381, are public agencies that may have discretionary approval authority for a project, and include, but are not limited to the United States Army Corps of Engineers (USACE), United States Fish and Wildlife Service (USFWS), California Department of Transportation (Caltrans), California Coastal Commission (CCC), San Diego Air Pollution Control District (SDAPCD), and San Diego Regional Water Quality Control Board (RWQCB).

Trustee Agencies are defined in Section 15386 of the CEQA Guidelines as state agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California, including the California Department of Fish and Wildlife (CDFW).

A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the proposed project is provided below.

U.S. Army Corps of Engineers: The USACE has jurisdiction over development in or affecting the navigable waters of the United States, pursuant to two federal laws: the Rivers and Harbors Act of 1889 and the Clean Water Act (CWA), as amended. A “navigable water” is generally defined by a blue line as plotted on a United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to waters of the U.S. are subject to Section 404 of the CWA. Impacts to waters of the U.S. (defined as direct fill or indirect effects of fill) greater than one-half acre require an individual permit. All permits issued by the USACE are subject to consultation and/or review by the USFWS and the United States Environmental Protection Agency (USEPA). No permits from the USACE are required at this time and are not anticipated for future development projects because the BASASP calls for potential USACE jurisdictional waters to be avoided. Future development projects implemented under the proposed project would be reviewed on a project-specific basis to determine the potential for impacts to USACE jurisdictional areas.

U.S. Fish and Wildlife Service: Acting under the federal Endangered Species Act (ESA), the USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as the USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, the USFWS will provide input to the USACE as part of the Section 404 process. The role of USFWS is limited within areas covered by the City’s Multiple Species Conservation Program (MSCP) Subarea Plan. For listed species covered by the Subarea Plan, the USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, the USFWS, and the CDFW in 1997. For future projects that are consistent with the City’s MSCP, the City has the authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP covered species list, the wildlife agencies retain permit authority. No permits from the USFWS are required at this time; however, development projects implemented under the proposed project may require review and/or permits in the future.

California Department of Fish and Wildlife: The CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/ stream, pursuant to Section 1600 et seq. of the California Fish and Game Code. The CDFW generally evaluates information gathered during preparation of the environmental documentation and attempts to satisfy their permit concerns in these documents. Where state listed threatened or endangered species not covered by the City’s MSCP occur on a project site, the CDFW would be responsible for the issuance of a Memorandum of Understanding (MOU) to ensure the conservation, enhancement, protection, and restoration of state listed threatened or endangered species and their habitats. No permits from the CDFW are required at this time; however, development projects implemented under the proposed project may require review and/or permits in the future.

California Department of Transportation: The BASASP area is bisected by I-5. Caltrans approval would be required for any encroachments into Caltrans ROW associated with future projects.

California Coastal Commission: The Coastal Act grants the CCC authority to review and approve plans and projects located within the Coastal Overlay Zone. A city with a certified LCP is able to issue Coastal Development Permits (CDPs) for projects in conformance with the adopted LCP. The CCC retains authority over some portions of the Coastal Overlay Zone (including deferred certification areas) and is responsible for the certification of updated LCPs. The proposed project is partially located within the Coastal Overlay Zone and an amendment to the LCP contained in the Pacific Beach Community Plan would require CCC approval.

San Diego Air Pollution Control District: The County of San Diego (County) Board of Supervisors sits as the Board of the SDAPCD, which is an agency that regulates sources of air pollution within the county. This is accomplished through an integrated monitoring, engineering, and compliance operation, each of which is a separate division, and each is designed to protect the public from the adverse impacts of polluted air. The SDAPCD would be responsible for issuing permits for the construction and operation of future projects.

San Diego Regional Water Quality Control Board: The RWQCB regulates water quality through the CWA Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266, which consists of wastewater discharge requirements. No permits from RWQCB are required at this time; however, future development projects may require review and/or permits in the future.

1.3 Type, Scope and Content, and Format

1.3.1 Type of EIR

This EIR has been prepared as a PEIR, as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR examines the environmental impacts of the proposed project, which is comprised of a series of actions. The combined actions can be characterized as one large project for the purpose of this study, and are herein referred to as the “proposed project” or “project.” The PEIR focuses primarily on the physical changes in the environment that would result from adoption and implementation of the proposed BASASP, and other related actions described more fully in Chapter 3.0, *Project Description*, including anticipated impacts that could result during future construction and operation.

1.3.2 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City as a result of initial project review and consideration of comments received in response to the Notice of Preparation (NOP) circulated July 5, 2017, and a scoping meeting held on July 18, 2017. The NOP for analysis of the proposed project, comment letters received, and comments made during the scoping meeting are included as Appendix A. Through these scoping activities, the proposed project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Land Use
- Air Quality
- Biological Resources

- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Historical and Tribal Cultural Resources
- Human Health/Public Safety/Hazardous Materials
- Hydrology, Water Quality, and Drainage
- Noise
- Paleontological Resources
- Population and Housing
- Public Services
- Public Utilities
- Transportation/Circulation
- Visual Effects and Neighborhood Character

The intent of this PEIR is to determine whether implementation of the proposed project would have a significant effect on the environment through analysis of the issues identified during the scoping process. Each environmental issue area includes a description of the existing conditions and regulations relevant to each environmental topic; a presentation of the threshold(s) of significance for the particular issue area under evaluation based on the City's CEQA Significance Determination Thresholds (City 2016a); an issue statement; an assessment of impacts associated with implementation of the proposed project; a summary of the significance of project impacts; and recommendations for mitigation measures, as appropriate. Pursuant to CEQA Guidelines Section 15126, all discretionary actions associated with the proposed project are considered in this PEIR when evaluating its potential impacts on the environment, including the construction of future development and operational phases. Impacts are identified as direct or indirect, short-term or long-term, and assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the proposed project compared to existing ground conditions.

The PEIR includes mandatory CEQA discussion areas as follows: Chapter 6.0 presents a discussion of cumulative impacts, and Chapter 7.0 presents a discussion of growth inducement impacts. Chapter 8.0 presents a brief discussion of the environmental effects of the project which were found not to be potentially significant. Chapter 9.0 discusses significant, unavoidable, and irreversible impacts. Potential alternatives to the proposed project are presented in Chapter 10.0.

1.3.3 PEIR Format

1.3.3.1 Organization

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

- **Executive Summary.** Provides a summary of the PEIR; a brief description of the proposed project; an identification of areas of controversy; and a summary table identifying significant impacts, proposed mitigation measures, and the significance of impact after mitigation. A summary of the proposed project alternatives and a comparison of the potential impacts of the alternatives with those of the proposed project is also provided.
- **Chapter 1.0, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.
- **Chapter 2.0, Environmental Setting.** Provides a description of the proposed project's regional context, location, and existing physical characteristics and land uses within the BASASP area. An overview of available public infrastructure and services, as well as relationship to relevant plans, is also provided in this chapter.
- **Chapter 3.0, Project Description.** Provides a detailed discussion of the proposed project, including background, objectives, key features, and environmental design considerations.
- **Chapter 4.0, History of Project Changes.** Summarizes the evolution of the proposed project through the public involvement process.
- **Chapter 5.0, Environmental Analysis.** Provides a detailed evaluation of potential environmental impacts associated with the proposed project for several environmental and land use issues. The analysis of each issue begins with a discussion of the existing conditions, and a statement of the specific thresholds used to determine the significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce significant impacts (if any). A statement regarding the significance of the impact after mitigation is provided.
- **Chapter 6.0, Cumulative Impacts.** Provides an analysis of the impacts of the proposed project in combination with other planned and future development in the region.
- **Chapter 7.0, Growth Inducement.** Evaluates the potential influence the proposed project may have on economic or population growth within the vicinity of the BASASP area, as well as the region, either directly or indirectly.
- **Chapter 8.0, Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to not be significant, and briefly summarizes the basis for these determinations.
- **Chapter 9.0, Significant and Unavoidable Impacts/Significant Irreversible Environmental Impacts.** Provides a summary of all of the significant effects identified in Chapter 5.0, and whether or not mitigation is available to reduce the impact to less than significant. This chapter also provides a summary of the significant irreversible effects identified in Chapter 5.0 related to the use of nonrenewable resources, provision of access into previously inaccessible areas, and hazards.

- **Chapter 10.0, Alternatives.** Provides a description of alternatives to the proposed project, including the No Project (Adopted Community Plans) Alternative and the Medium Density Alternative.
- **Chapter 11.0, References Cited.** Lists all of the reference materials cited in the PEIR.
- **Chapter 12.0, Individuals Consulted/Preparers.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the PEIR.

1.3.3.2 Technical Appendices

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR, and are included as appendices to this PEIR. The technical reports prepared for the proposed project and their location in the PEIR are listed in the table of contents.

The technical appendices are available for review at the City's Planning Department located at 9485 Aero Drive, San Diego, California 92123, and on the Planning Department's CEQA Policy and Review webpage: <https://www.sandiego.gov/planning/programs/ceqa>.

1.3.3.3 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this PEIR, and their relationship to this PEIR described. These documents are included in Chapter 12.0, *References Cited*, and are hereby incorporated by reference. They are available for review at the City Planning Department, located at 9485 Aero Drive, San Diego, California 92123.

- City of San Diego General Plan (City 2008a);
- City of San Diego Municipal Code including the Land Development Code ([LDC], Chapters 11-15) (City 2008a);
- City of San Diego Pacific Beach Community Plan and LCP (City 1995);
- City of San Diego Clairemont Mesa Community Plan, as amended (City 2011); and
- MSCP Subarea Plan (City 1997).

1.4 PEIR Process

The City, as Lead Agency, is responsible for the preparation and review of this PEIR. The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, and the second stage is the Final PEIR.

1.4.1 Draft PEIR

The Draft PEIR ~~was~~^{is} distributed for review to the public and interested and affected agencies for a review period of ~~61~~¹⁴⁵ days for the purpose of providing comments "on the sufficiency of the

document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (Section 15204, CEQA Guidelines). In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft PEIR a Notice of Completion ~~will be~~was filed with the State Office of Planning and Research and a Notice of Availability of the Draft PEIR ~~will be~~was issued in a newspaper of general circulation in the area.

The Draft PEIR and all related technical studies are available for review at the offices of the City’s Planning Department and on the Planning Department’s CEQA Policy and Review webpage: <https://www.sandiego.gov/planning/programs/ceqa>.

Copies of the Draft PEIR ~~are~~were also available at the public libraries in the City, as listed in Table 1-1, *List of Libraries for Distribution of Draft PEIR*.

**Table 1-1
LIST OF LIBRARIES FOR DISTRIBUTION OF DRAFT PEIR**

Branch Name	Location
Central Library	330 Park Boulevard
Pacific Beach/Taylor Branch Library	4275 Cass Street
North Clairemont Branch Library	4616 Clairemont Drive
Balboa Branch Library	4255 Mount Abernathy Avenue
Clairemont Branch Library	2920 Burgener Boulevard

1.4.2 Final PEIR

Comments addressing the scope and adequacy of the environmental analysis ~~will be~~were solicited during the Draft PEIR public review. Following the end of the public review period, the City, as the Lead Agency, ~~will~~has provided written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088. All comments and responses ~~will be~~have been considered in the review of the PEIR. Detailed responses to the comments received during public review, Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unmitigable ~~will be~~have been prepared and compiled as part of the PEIR finalization process. ~~The~~ This Final PEIR will be available for public review at least 14 days before the City Council hearing in order to provide commenters the opportunity to review the written responses to their comment letters. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR and adopt the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and Statement of Overriding Considerations as being complete and in accordance with CEQA.

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2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The BASASP area is located in the Clairemont Mesa and Pacific Beach community planning areas within the City in western San Diego County (refer to Figure 1-1). The BASASP area encompasses a total of approximately 210 acres (0.33 square miles) and is bounded by Rose Creek on the west, Morena Boulevard on the east, Grand Avenue and Mission Bay Drive on the south, and Avati Drive on the north (refer to Figure 1-2).

Major regional transportation corridors bisect the BASASP area, including I-5 and the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor. I-5 bisects the BASASP area in a north-south alignment; the portion of the BASASP area east of I-5 is located within the Clairemont Mesa community, and the area on the west side of I-5 is located within the Pacific Beach community. The LOSSAN rail corridor generally runs parallel to the east side of I-5. The Mid-Coast Trolley, which consists of the San Diego Metropolitan Transit System (MTS) Blue Line Trolley line extension from Downtown San Diego to the University community, will also traverse the BASASP area along the east side of the existing tracks within the LOSSAN rail corridor. This major regional transit route is currently under construction and service is anticipated to begin in 2021. A new trolley station, the Balboa Avenue Station, will be constructed as part of the new Blue Line Trolley extension adjacent to the east side of the rail corridor and south of Balboa Avenue. The Balboa Avenue Station will be an at-grade transit station with canopies for seating, a bus platform with five bays, a pedestrian bridge over Balboa Avenue, sidewalks, bicycle lockers, traffic signals, a “Kiss-n-Ride” drop-off area, a surface parking lot, and other circulation and landscape improvements. Other major roadways in the BASASP area include Balboa Avenue, Mission Bay Drive, Garnet Avenue, Grand Avenue, and Morena Boulevard.

The portion of the BASASP area south of Garnet Avenue and west of the LOSSAN railroad ROW is located within the Coastal Overlay Zone. Additionally, the City’s Multi-Habitat Planning Area (MHPA) lands are located along a portion of Rose Creek, both within and adjacent to the BASASP area.

2.2 Physical Characteristics

2.2.1 Land Use

2.2.1.1 Existing Land Use

The BASASP area is predominantly urbanized and developed with commercial, industrial, and residential uses, and also includes open space and regional transportation facilities. Commercial uses within the BASASP area are generally located on the west side of I-5 and include car dealerships, automotive services, restaurants, hotels, and other retail and service businesses. Industrial uses within the BASASP area are generally located along Morena Boulevard and Santa Fe Street on the east side of I-5 and north of Balboa Avenue. Industrial uses include the City’s Rose Creek Operations Yard, a San Diego Gas and Electric (SDG&E) facility, and several warehouses. Residential uses are primarily located within the western portion of the BASASP area south of

Garnet Avenue and west of Mission Bay Drive. Residences are also located in the southern portion of the BASASP, west of I-5 and along Del Rey Street. Rose Creek runs north-south along the western boundary of the BASASP area, with portions that meander within the BASASP area. The Rose Creek Trail runs along the eastern side of Rose Creek between Garnet Avenue and Grand Avenue. Existing land uses and zoning within the BASASP area are shown in Figure 2-1, *Existing Land Uses*, and Figure 2-2, *Existing Zoning*.

2.2.1.2 Surrounding Land Uses

Surrounding uses include open space associated with Rose Canyon/Creek and residential neighborhoods within Pacific Beach to the west; Mission Bay Park, including athletic fields, a municipal golf course, and De Anza Cove Park to the south; primarily residential neighborhoods within Clairemont Mesa to the east; and industrial uses to the north. Institutional uses (schools, churches, and libraries) and recreational facilities (parks and community centers) are interspersed throughout surrounding residential neighborhoods. Beaches and other coastal amenities are located around Mission Bay to the southwest and in Pacific Beach to the west.

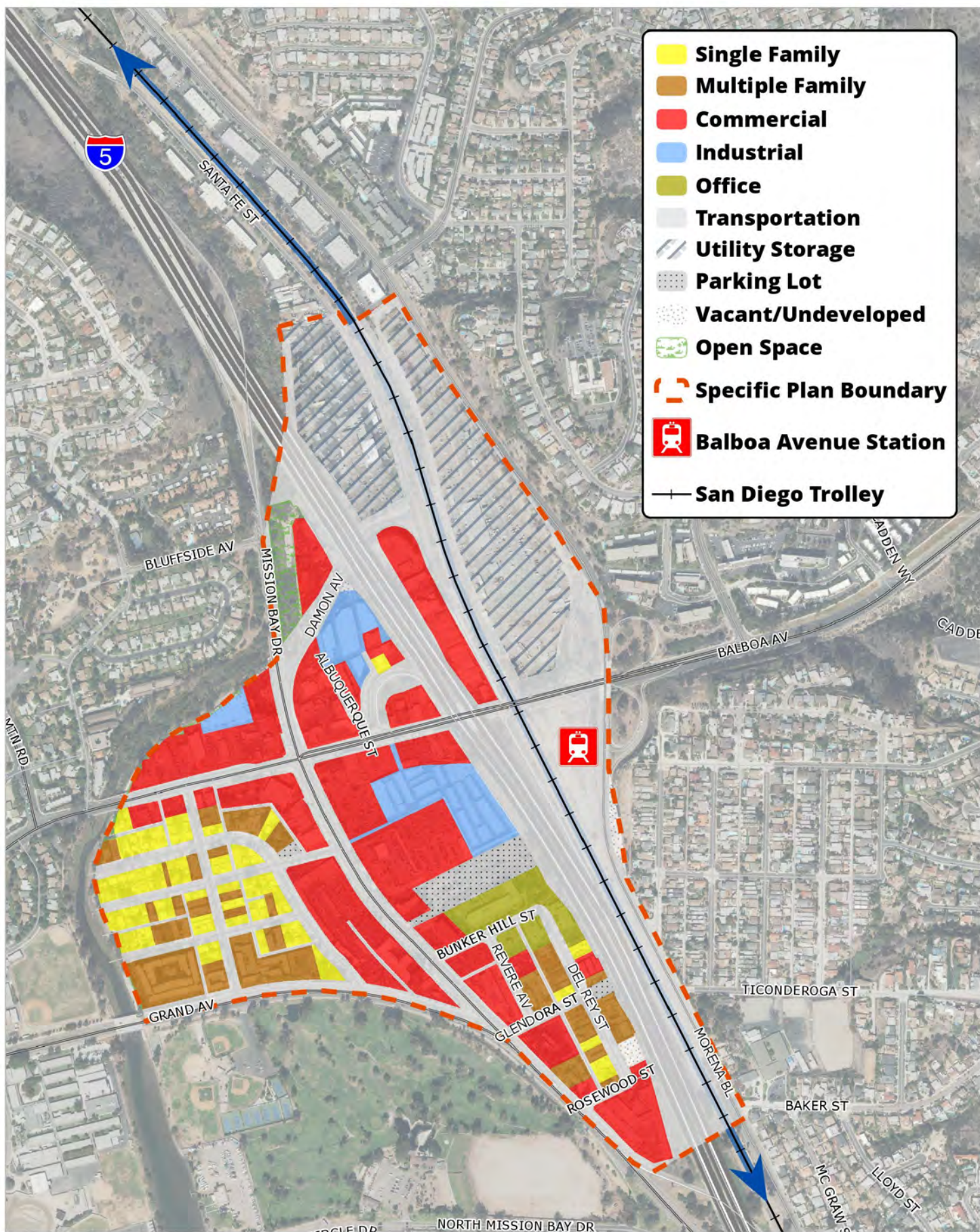
2.2.2 Geography/Topography

The BASASP area is located within the coastal portion of the Peninsular Ranges Geomorphic Province, which extends approximately 920 miles from the Los Angeles Basin to the southern tip of Baja California, and varies in width from approximately 30 to 100 miles.

Topographically, the BASASP area has varying elevations from a low of approximately 10 feet above mean sea level (AMSL) in the west to a high of approximately 160 feet AMSL in the east. The majority of the BASASP area is relatively level; the eastern portion consists of hills that generally ascend toward Clairemont Mesa to the east.

2.2.3 Geology and Paleontology

Geologic and surficial units identified within the BASASP area include (in order of increasing age) fill materials, young alluvial deposits, young colluvial deposits, old alluvial deposits, old paralic deposits, San Diego Formation, Scripps Formation, Ardath Shale, and Mount Soledad Formation. Artificial fill is present in much of the BASASP area in association with development such as structures and roadways, and exhibits no potential for the occurrence of sensitive paleontological resources. Alluvial and colluvial deposits are found along the valley floor of Rose Canyon and the banks of Rose Creek in the northern portion of the BASASP area; these materials exhibit no potential for the occurrence of sensitive paleontological resources. Old paralic deposits, also referred to as the Bay Point Formation, occur in the northeastern and central portions of the BASASP on either side of I-5, and exhibit a high potential for the occurrence of sensitive paleontological resources. The San Diego Formation occurs in two separate areas in the southeast and northwest portions of the BASASP area and exhibits a high potential for the occurrence of sensitive paleontological resources. The Scripps Formation is located on the east side of Rose Canyon, south of Balboa Avenue, and exhibits a high potential for the occurrence of sensitive paleontological resources. Ardath Shale is found along a portion of the eastern edge of the BASASP boundary and exhibits a high potential for the occurrence of sensitive paleontological resources. The Mount Soledad Formation occurs along portions of the northern edge of the BASASP boundary and exhibits a high potential for the occurrence of sensitive



Balboa Avenue Station Area Specific Plan

Existing Land Uses

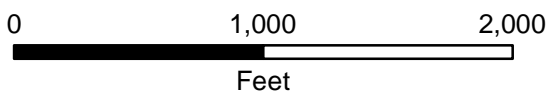
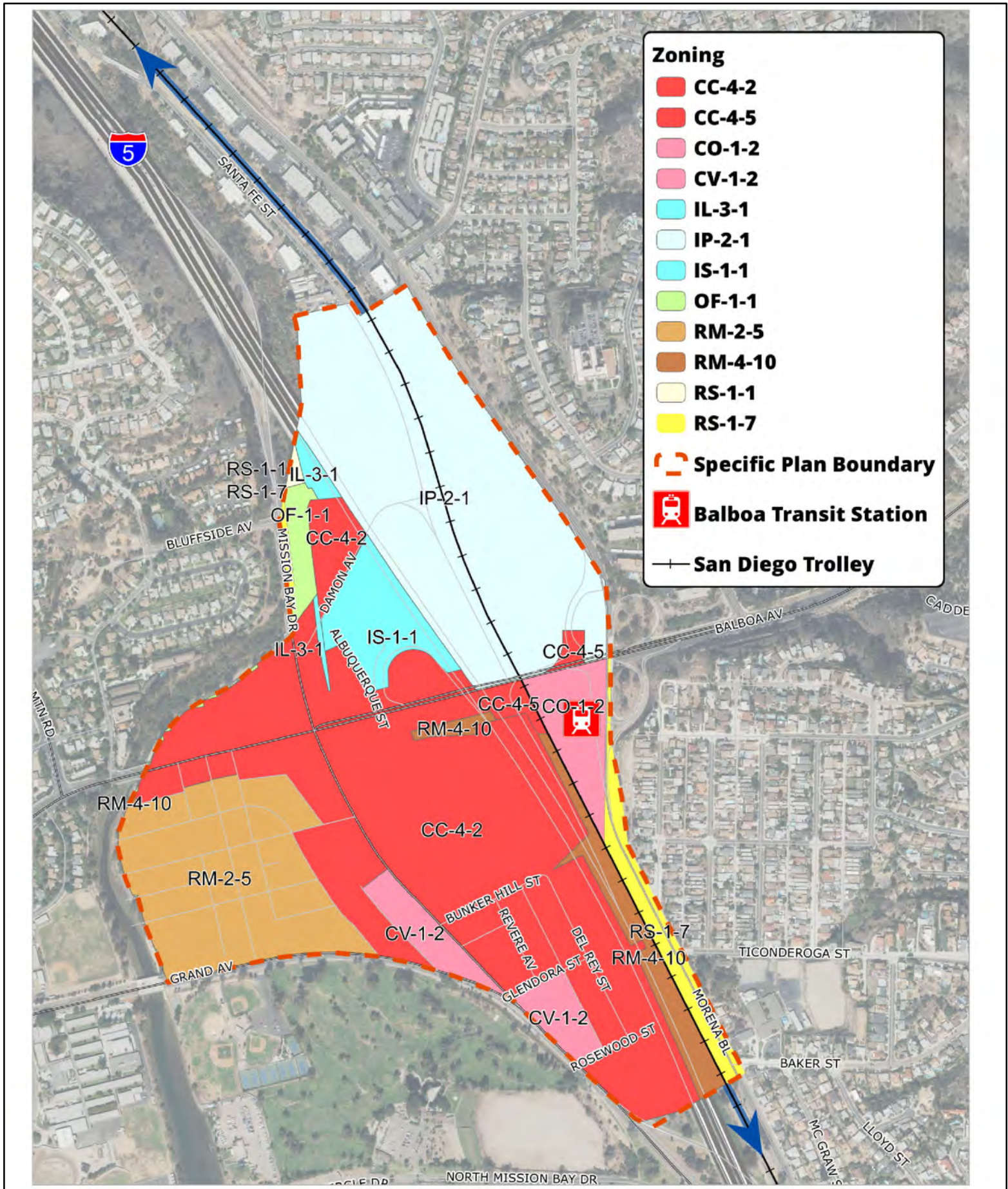


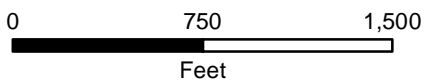
Figure 2-1



Balboa Avenue Station Area Specific Plan

Existing Zoning

Figure 2-2



paleontological resources. Specific information on geology is described in Section 5.5, *Geology and Soils*, and information pertaining to paleontology is described in Section 5.11, *Paleontological Resources*.

2.2.4 Drainage

The BASASP area is located within Mission Bay Watershed Management Area and within the Miramar Hydrologic Area (HA) of the Peñasquitos Hydrologic Unit (HU). The Peñasquitos HU is a generally triangular-shaped area of approximately 170 square miles extending from Poway in the east to La Jolla in the west. Storm water runoff from the BASASP drains in a generally westerly direction toward Rose Creek, which empties into Mission Bay. Runoff is conveyed to receiving waters via streets, gutters, cross gutters, open channels, and storm drain systems. The only drainage course within the BASASP area is Rose Creek along the western BASASP boundary. Specific details regarding drainage within the BASASP area are described in Section 5.9, *Hydrology, Water Quality, and Drainage*.

2.2.5 Water Quality

The BASASP area is almost entirely developed and is highly impervious. Current land uses in the BASASP area include a mixture of commercial, industrial, residential, and transportation uses. Typical pollutants that can be expected from these land uses include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides. Receiving waters for the BASASP area that are currently listed as impaired (based on the ~~2010~~2014-2016 303(d) List) include Rose Creek and Mission Bay (mouth of Rose Creek). Specific pollutants for these receiving waters are discussed in Section 5.9, *Hydrology, Water Quality, and Drainage*.

2.2.6 Historical and Tribal Cultural Resources

The BASASP area is within the traditional territory of the Kumeyaay people. The Kumeyaay of the prehistoric and contact periods inhabited San Diego County from Agua Hedionda Lagoon in Carlsbad south into Baja California and from the Pacific Ocean east to the Salton Sea.

Two cultural resources have been recorded within the BASASP area. The ethnohistoric village site known as La Rinconada de Jamo is partially within the BASASP area. The other site recorded within the BASASP area includes one isolate and a small scatter of historic domestic refuse. There are no historic properties within the BASASP area listed on the City's Historic Landmarks List, the California Register of Historic Resources, the California Historical Landmarks list, California Historical Points of Interest list, or the National Register of Historic Places. One property within the BASASP area, the Trade Winds Hotel sign, was determined to be potentially eligible as a City Historic Landmark for its association with the postwar period of development in the Pacific Beach area and its distinctive design. One additional property within the BASASP area was identified as a potential historic resource. The Chase Bank building at Mission Bay Drive was constructed in 1977 and is therefore outside the 45-year threshold for potential historic resources. However, it features intact mural mosaics by noted artist Millard Sheets depicting the history of San Diego. As such, this bank has the potential to be considered a historic resource, ~~once sufficient time has passed to adequately evaluate it.~~ The Native American Heritage Commission (NAHC) did not identify any recorded Native American cultural resources within the BASASP area. There are no known human remains within the

BASASP area. Specific information on historical and tribal cultural resources in the BASASP area is described in Section 5.7, *Historical and Tribal Cultural Resources*.

2.2.7 Biological Resources

There are 10 vegetation communities/land cover types present in the BASASP area, including: freshwater marsh, southern willow scrub, southern riparian forest, non-native riparian, streambed, Diegan coastal sage scrub, non-native grassland, eucalyptus woodland, disturbed habitat, and developed. All of these except eucalyptus woodland, disturbed habitat, and developed are considered sensitive vegetation communities.

The majority of the BASASP area consists of developed land with little to no sensitive or special status biological resources. Sensitive vegetation is primarily located along Rose Creek and consists of riparian communities. Diegan coastal sage scrub and non-native grassland are also considered sensitive and are found along the rail corridor. These areas containing sensitive vegetation could potentially support special status species. Specific information on sensitive biological resources in the BASASP area is described in Section 5.3, *Biological Resources*.

2.2.8 Transportation

2.2.8.1 Roadways and Access

I-5 provides regional access to the BASASP area, with interchanges at Balboa Avenue and Mission Bay Drive. Major roadways in the BASASP area include Balboa Avenue, Garnet Avenue, Grand Avenue, Mission Bay Drive, and Morena Boulevard.

2.2.8.2 Alternative Transportation

There are currently two bus transit lines providing access to the BASASP area. Route 27 extends east/west along Balboa Avenue and Garnet Avenue and serves destinations including Mission Beach, Kearny Mesa Transit Center, and Genesee Plaza (shopping centers, transit centers, employment, etc.). Route 30 extends along Grand Avenue and serves destinations including the Veterans Affairs (VA) Medical Center, UTC Shopping Mall, and the Old Town Transit Center (shopping centers, transit centers, employment, etc.).

The LOSSAN rail corridor is located east of and parallel to I-5 in the BASASP area, and bisects the BASASP area in a north-south direction. It does not, however, make any stops in the BASASP area. The Mid-Coast Trolley, which consists of the MTS Blue Line Trolley line extension from Downtown San Diego to the University community, will also traverse the BASASP area along the east side of the existing tracks within the LOSSAN rail corridor. This major regional transit route is currently under construction and service, including to the new Balboa Avenue Station, is anticipated to begin in 2021.

In addition to transit, bikeways and pedestrian sidewalks exist within the BASASP area. A Class I bike path is located both north and south of Grand Avenue along Rose Creek at the western extent of the BASASP area, a Class II bike lane extends east-west along Grand Avenue, and a Class III bike route trends northeasterly along Damon Avenue from Rose Creek under I-5 to Santa Fe Street. Most

streets within the BASASP area include sidewalks. Specific information on alternative transportation in the BASASP area is described in Section 5.15, *Transportation/Circulation*.

2.2.9 Air Quality/Climate

The BASASP area is located within the San Diego Air Basin (SDAB) of the San Diego Air Pollution Control District (SDAPCD). Local climate for the San Diego region, including the BASASP area, is influenced by proximity to the Pacific Ocean and semi-permanent high-pressure systems that result in warm, dry summers and mild, occasionally wet winters. The average annual precipitation for the area is approximately 10 inches, falling primarily from November to April. The annual average maximum temperature in the BASASP area is approximately 67 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56°F. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds blowing pollutants away from the coast toward inland areas. Specific information on air quality in the San Diego region, including the BASASP area is described in Section 5.2, *Air Quality*.

The BASASP area is currently a source of anthropogenic greenhouse gases (GHGs), with emissions generated by vehicular traffic and by the energy use, water use, and solid waste disposal practices of existing development. Specific information on GHG emissions in the San Diego region, including the BASASP area is described in Section 5.6, *Greenhouse Gas Emissions*.

2.3 Public Infrastructure

The BASASP area is served by a variety of public services and facilities, including utilities such as water and sewer, as well as solid waste collection, processing, and disposal. A brief summary of key public services and facilities is provided below. Analysis of the potential environmental effects of the proposed project related to public services and facilities is discussed further in Section 5.13, *Public Services*, and Section 5.14, *Public Utilities*.

2.3.1 Public Services and Facilities

2.3.1.1 Parks and Recreation

There are approximately 46.45 acres of population-based parkland in Pacific Beach and approximately 120.87 acres of population-based parkland in Clairemont Mesa. In addition to the population-based parks, residents in both the Pacific Beach and Clairemont Mesa communities also utilize additional recreational opportunities in Mission Bay Park, a Regional Park, and the Shoreline Parks and Beaches along the Pacific Ocean; however, per the General Plan standards, Regional Parks, Shoreline Parks, and Beaches do not contribute to a community's population-based parkland requirements standards.

The Pacific Beach community contains seven population-based parks and four joint-use facilities ranging in size between approximately 0.06 useable acres and 19.05 useable acres, including Pacific Beach Community Park, Kate Sessions Memorial Park, Capehart Neighborhood Park, Pacific Beach Neighborhood Park, Palisades Park North and South, Color Mini-Park, and joint-use facilities with four schools (Pacific Beach Middle, Pacific Beach Elementary, Crown Point Elementary, and Bayview

Terraces Elementary). Pacific Beach also has one Recreation Center, Pacific Beach Recreation Center, which serves the community. While all of these facilities are within the larger community of Pacific Beach, they are located outside of the BASASP area.

The Clairemont Mesa community includes four joint-use facilities at schools and 13 population-based parks, including five community parks, and seven neighborhood parks. Parks range in size between approximately 2.30 useable acres and 33.92 useable acres and include Cadman Community Park, North Clairemont Community Park, Olive Grove Community Park, South Clairemont Community, Hickman Field, Tecolote Community Park, East Clairemont Athletic Area, Gershwin Neighborhood Park, Lindbergh Neighborhood Park, MacDowell Neighborhood Park, Mt. Acadia Neighborhood Park, Mt. Etna Neighborhood Park, and Western Hills Neighborhood Park. Joint-use facilities in the Clairemont Mesa community are located at Alcott Elementary, Cadman Elementary, Field Elementary, and Marston Middle Schools. Clairemont Mesa also has three Recreation Centers (Cadman Recreation Center, South Clairemont Recreation Center, and North Clairemont Recreation Center) as well as one Aquatic Complex, Clairemont Aquatic Complex, which serve the community. All of the above listed park and recreation facilities are located outside of the BASASP area.

2.3.1.2 Libraries

The BASASP area is currently served by the following four San Diego Public Library branch libraries, none of which are within the BASASP area:

- The Pacific Beach/Taylor Branch Library is located about 1.67 miles west of the BASASP area at 4275 Cass Street. This branch includes 12,484 square feet of building area.
- The Clairemont Branch Library is located about 1.20 miles southeast of the BASASP area at 2920 Burgener Boulevard. This branch includes 4,437 square feet of building area. The Clairemont Mesa Community Plan recommends replacing the existing library with a 10,000-square-foot library.
- The North Clairemont Branch Library is located about 1.20 miles northeast of BASASP area at 4616 Clairemont Drive. This branch includes about 5,136 square feet of building area.
- The Balboa Branch Library is located about 2.45 miles northeast of the BASASP area at 4255 Mount Abernathy Avenue. This branch includes about 5,092 square feet of building area. The Clairemont Mesa Community Plan recommends a 5,000-square foot expansion of this branch.

2.3.1.3 Schools

The BASASP area is served by the San Diego Unified School District (SDUSD), which serves students from kindergarten through 12th grade. There are no existing or planned schools within the BASASP area. A total of eight public schools located outside the BASASP area would serve the BASASP area, including four elementary schools (Cadman, Crown Point, Sessions, and Toler), two middle schools (Pacific Beach and Marston), and two high schools (Mission Bay and Clairemont). No new school facilities are currently planned within the BASASP area; however, all development projects within the

City are required to pay school fees as mandated by state law to accommodate the needs of public schools serving existing and future students.

2.3.1.4 Fire Protection

Fire protection services to the BASASP area are provided by the San Diego Fire-Recue Department (SDFD). In addition to fire protection services, the SDFD also provides Emergency Medical Services (EMS). San Diego Fire Station 25 provides primary fire protection and advanced life support services to the BASASP area and is located at 1972 Chicago Street, about 1.5 miles southeast of BASASP area. This station includes a fire engine and battalion. No new fire stations are planned within the BASASP area.

2.3.1.5 Police Protection

The BASASP area is currently patrolled by Beats 113, 116, and 122 in the Northern Division of the San Diego Police Department (SDPD). Beat 122 covers the majority of the BASASP area, and Beats 113 and 116 cover the areas east of I-5, north and south of Balboa Avenue, respectively.

2.3.2 Utilities

2.3.2.1 Water

The City's Public Utilities Department (PUD) provides potable water service to the BASASP area via existing public water mains located within the streets and private water lines that connect laterally to the public water mains.

2.3.2.2 Sewer

The City's PUD collects and treats wastewater generated in the BASASP area through an existing sewer system. Wastewater collected is conveyed through various interceptors and pipelines to pump stations, and then to the Pacific Ocean via outfalls.

2.3.2.3 Storm Water

The City's Transportation and Storm Water Department is responsible for the operation and maintenance of the City's storm drain system. Storm drain facilities are located throughout the BASASP area and convey storm water runoff to the Rose Creek channel, which empties into Mission Bay.

2.3.2.4 Solid Waste

Solid waste generated in the BASASP area is collected by private franchised haulers, and taken to one of the following facilities: Miramar Landfill, Otay Landfill, or Sycamore Sanitary Landfill. The Miramar and Sycamore landfills are both located in the City, while the Otay Landfill is located in the unincorporated County. Recycling services are also provided by these haulers, and recycled materials are processed at several materials recovery facilities in and around the City.

2.3.2.5 Electricity/Natural Gas

SDG&E provides electricity and natural gas to the BASASP area.

2.4 Planning Context

Development projects are guided by the City's General Plan, and more specifically by the adopted Pacific Beach and Clairemont Mesa Community Plans. The Land Development Code (LDC) and Citywide zoning implements the Community Plans. In addition, various other City, regional, and state plans, programs, and ordinances regulate the development of land within the City. The southwestern portion of the BASASP area is located within the State Coastal Overlay Zone Boundaries, as defined by the Coastal Act. A detailed evaluation of the proposed project's consistency with relevant plans and ordinances is provided in Section 5.1, *Land Use*.

3.0 PROJECT DESCRIPTION

The Balboa Avenue Station Area Specific Plan (BASASP) is a Specific Plan that would amend the Pacific Beach Community Plan/Local Coastal Program (LCP) to redesignate and rezone lands within the BASASP area to encourage and allow for public and private transit-oriented development (TOD) in the vicinity of the Balboa Avenue Station (Figure 1-2). The proposed BASASP would also provide recommendations and guidelines for the public right-of-way (ROW) that would emphasize access to the Balboa Avenue Station and would capitalize on the new regional transit connection in the BASASP area. The proposed BASASP promotes increasing mobility options, decreasing dependency on single occupancy vehicles, and reducing traffic congestion at local intersections and roadways.

The overarching goals of the BASASP include:

- Identifying multi-modal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station; and
- Establishing goals and policies to guide future public and private development to establish TOD adjacent to the Balboa Avenue Station; ~~and~~

3.1 Relationship to the General Plan and Community Plans

The City Council adopted the General Plan in 2008. The General Plan does not change land use designations or zoning on individual properties, but rather provides policy direction for future community plan updates, discretionary project review, and implementation programs. The General Plan expresses a citywide vision and provides a comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define it.

The BASASP area falls within the boundaries of both the Pacific Beach Community Plan/LCP (City 1995) and the Clairemont Mesa Community Plan areas (City as amended in 2011; refer to Figure 1-2). The Pacific Beach Community Plan establishes a balance between providing for the needs of the residential community and serving as a visitor destination. The Pacific Beach Community Plan calls for increased multi-modal access to the Balboa Avenue Station. The Clairemont Mesa Community Plan calls for direct, landscaped pedestrian connections to the Balboa Avenue Station with landscaping designed to link it to Clairemont Drive. The Clairemont Mesa Community Plan includes recommendations for the Balboa Avenue Station and surrounding areas including amenities and access to multi-modal alternatives.

The proposed BASASP is intended to further express General Plan and Community Plan policies within the Pacific Beach and Clairemont Mesa communities through the provision of area-specific recommendations that would implement citywide goals and policies by allowing for TOD and multi-modal improvements. Specific General Plan policies are referenced within the BASASP to emphasize their relevance and importance in the community, as discussed further in Section 5.1, *Land Use*, of this PEIR. The General Plan, Community Plans, and BASASP would work together to establish the framework for growth and development within the BASASP area. The Land Development Code (LDC) implements the Pacific Beach and Clairemont Mesa Community Plans and BASASP policies and

recommendations through zoning and development regulations. The proposed BASASP includes supplemental development regulations to provide a standard for evaluating development projects within the Pacific Beach portion of the Specific Plan area. It is intended that these supplemental regulations, in combination with the development regulations of the applicable base zone, would create the type of development within the Pacific Beach portion of the Specific Plan envisioned by the BASASP.

This PEIR provides an analysis and evaluation of ~~relevant land use and~~ environmental issues associated with the proposed project and associated land use and zoning amendments, as described in greater detail in this chapter. A comprehensive analysis of the proposed project's consistency with applicable plans and policies is contained in Section 5.1, *Land Use*.

3.2 Project Background

The proposed BASASP is a comprehensive planning document that would provide a policy framework to guide TOD and multi-modal improvements within walking distance of the future Balboa Avenue Station consistent with the General Plan's City of Villages strategy. The Balboa Avenue Station is part of the San Diego MTS Blue Line Trolley line extension being implemented from Downtown San Diego to the University ~~community planning~~ Community Plan area that will parallel I-5 and traverse the BASASP area.

The Balboa Avenue Station will be an at-grade transit station with canopies for seating, a bus platform with five bays, a pedestrian bridge over Balboa Avenue, sidewalks, bicycle lockers, traffic signals, a "Kiss-n-Ride" drop-off area, a surface parking lot, and other circulation and landscape improvements. Off-site improvements include the removal of the eastbound Balboa Avenue to southbound Morena Boulevard ramp. Traffic will be diverted to the eastbound Balboa Avenue to Morena Boulevard ramp, which will be widened and its intersection with Morena Boulevard will be signalized. A new signalized intersection will also be constructed at the southern end of the station site for buses. In addition, the northbound I-5 off-ramp to eastbound Balboa Avenue will be widened to include two turn lanes and a new traffic signal at Balboa Avenue. Pedestrian access from Morena Boulevard to the Balboa Avenue Station will be provided via new sidewalks on both the east and west sides of Morena Boulevard south of Balboa Avenue. A pedestrian bridge with ramps and stairs will be provided across Balboa Avenue for access to the Station from the north side of Balboa Avenue. Access from the south side of Balboa Avenue will be provided via both ramps and stairs. The Blue Line Trolley line extension is currently under construction and service is anticipated to begin in 2021.

The Balboa Avenue Revitalization Action Program (RAP) implements a vision for pedestrian-oriented mobility improvements to along Balboa Avenue within Clairemont Mesa. The RAP provides recommendations for the Balboa Avenue ROW including landscaping, street design, walkways and crossings. Located within Segment Four (Western Gateway-Clairemont Drive to I-5) of the RAP, the proposed project includes an amendment to the Clairemont Mesa Community Plan to reclassify Balboa Avenue east of Moraga Avenue from a 6-lane Major to a 4-lane Major consistent with the recommendation of the RAP. Additionally, the BASASP includes mobility and streetscape policies that-complements and builds upon the recommendations in the RAP.

In 2006, California voters passed the Safe Drinking Water, Water Quality and Supply, Flood Control, River, and Coastal Protection Bond Act of 2006 (Proposition 84) authorizing \$180 million to support Sustainable Communities Programs. In 2008, the Legislature allocated funds to be awarded through competitive grants administered by the California Strategic Growth Council. The California Strategic Growth Council awarded the City grant funding to prepare the proposed BASASP as part of the Sustainable Communities Planning Grant and Incentives Program.

3.3 Community Involvement in the Planning Process

Public outreach during development of the proposed BASASP was primarily conducted by the City through Pacific Beach and Clairemont Mesa Community Planning Group Subcommittee meetings and pop-up outreach events in both communities. A project website was established to promote the planning effort and provide for online engagement with interested community members. Outreach was a collaborative process between community members, stakeholders, agencies, consultants, and the City with the participation strategy designed to:

- Enhance community participation and input;
- Integrate consensus building with the planning process;
- Strengthen community partnerships;
- Provide learning opportunities to improve mobility, housing, recreation, access, and quality of life issues for residents, businesses, and visitors; and
- Gather and integrate community input and feedback.

3.4 Project Objectives

In addition to the overarching goals outlined above, the project objectives for the proposed BASASP are as follows:

- Establish a TOD village that capitalizes on the trolley station investment by the San Diego Association of Governments (SANDAG) and MTS;
- Provide a plan that allows for a mix of land uses that serves residents, generates economic prosperity, and capitalizes on visitor traffic;
- Establish a plan that encourages high density residential or mixed-use development; higher intensity employment areas, and activity centers within walking or biking distance of transit corridors and the trolley station;
- Increase the supply and variety of housing types -- affordable for people of all ages and income levels -- in areas with frequent transit service and with access to a variety of services;
- Focus development in an area where there is available public infrastructure and transit;

- Increase mobility for pedestrians, cyclists, transit users, and automobiles through improved linkages at key points, with a strong pedestrian focus;
- Identify key mobility improvements to facilitate connections within and through the BASASP area, as well as to surrounding areas.
- Identify design criteria for urban public spaces, such as mini-parks, plazas, promenades, and venues that support a variety of events and gatherings;
- Expand access to park and recreation facilities within and adjacent to the BASASP area, including trail options and joint use opportunities, to promote a healthy, active community;
- Incorporate sustainability practices, policies, and design features into projects within the BASASP area that reduce greenhouse gas (GHG) emissions; and
- Craft a clear and practical implementation strategy for properties and improvements within the BASASP area.

3.5 Specific Plan Components

The proposed BASASP is divided into the following six major chapters, each of which is discussed below:

- Land Use;
- Mobility;
- Urban Design;
- Recreation;
- Infrastructure and Public ~~Utilities~~ Facilities; and
- Conservation.

In addition, the proposed BASASP contains a chapter related to the implementation and administration of the Specific Plan. As appropriate, specific policies in the proposed BASASP which may result in environmental impacts or could function to reduce potential environmental impacts are cited in Chapter 5.0, *Environmental Analysis* of this PEIR.

3.5.1 Land Use Chapter

The Land Use chapter of the proposed BASASP establishes the distribution and pattern of land uses throughout the BASASP area and outlines area-specific policies to guide future development. The land use policies in the proposed BASASP are focused on promoting TOD within the Pacific Beach portion of the BASASP area; properties located within the Clairemont Mesa area are not subject to the BASASP policies and supplemental development regulations. There are no proposed changes to land uses within the Clairemont Mesa portion of the BASASP area.

3.5.1.1 Land Use Designations

As illustrated in Figure 3-1, *Proposed Land Use Map*, the BASASP proposes the following two new land use designations: Residential (15 to 54 dwelling units per acre) and Community Village, and two land use designations consistent with the adopted Pacific Beach Community Plan: Light Industrial and Flood Control/Open Space. Each of these designations is described in Table 3-1, *Proposed Land Use Designations, Zone Classifications, and Zone Purpose*. The proposed project would include a corresponding rezone of the properties within the BASASP area for consistency with the land use designations as shown in Figure 3-2, *Proposed Zoning Map*, and Figure 3-3, *Proposed Rezone Areas*. The zoning for properties within the BASASP area designated Light Industrial would remain unchanged. Table 3-2, *Land Use Designation and Maximum Development Potential*, characterizes the extent of each land use proposed within the BASASP area. The proposed BASASP would allow up to 4,729 residential units, including 895 multi-family and two single-family dwelling units, within the residentially-designated areas and up to 3,832 multi-family residential units within the Community Village designation. The BASASP would allow an additional 3,508 dwelling units as compared to the adopted Pacific Beach Community Plan. In addition, up to 669,800 square feet (SF) of commercial retail uses and 423,500 SF of industrial uses could be developed within the BASASP area. An Active Commercial frontage is proposed along the main roadways in the BASASP area.

Table 3-1
PROPOSED LAND USE DESIGNATIONS, ZONE CLASSIFICATIONS, AND ZONE PURPOSE

Land Use Designation	Zone Classification	Zone Purpose
Residential (15-54 du/ac)	RM-3-8	The purpose of the RM-3-8 zone is to provide for multiple dwelling unit development at a maximum density of 1 dwelling unit for each 800 square feet of lot area.
Community Village (0-73 du/ac)	CC-3-8	The purpose of the CC-3-8 zone is to accommodate community-serving commercial services and retail uses with a high intensity, pedestrian orientation, which permits a maximum of 1 dwelling unit for each 600 square feet of lot area.
Community Village (0-109 du/ac)	CC-3-9	The purpose of the CC-3-9 zone is to accommodate community-serving commercial services and retail uses with a high intensity, pedestrian orientation, which permits a maximum of 1 dwelling unit for each 400 square feet of lot area.
	RM-4-10	The RM-4-10 zone permits urbanized, high density multiple dwelling units with limited commercial uses and a maximum density of 1 dwelling unit for each 400 square feet of lot area.
Light Industrial	IS-1-1	The purpose of the IS-1-1 zone is to provide for small-scale industrial activities within urbanized areas.
Flood Control/Open Space	OF-1-1	The purpose of the OF-1-1 zone is to control development within floodplains.

Source: City of San Diego 2017
du/ac = dwelling units per acre

As illustrated in Table 3-2, much of the BASASP area would be designated for Community Village, while the balance of the land area would be for Residential and Light Industrial use. A portion of

the 210-acre BASASP area includes ROW associated with I-5 and the rail lines that traverse the BASASP area. The BASASP estimates that implementation of the proposed project would result in an approximate future population of 8,800 at buildout (equivalent to a net increase of 6,525 persons in the BASASP area over population levels anticipated at buildout under the adopted Pacific Beach Community Plan).

Table 3-3 compares the build out of adopted community plan and proposed BASASP land uses based on the future land use and residential development build out assumptions and analysis undertaken for the proposed Specific Plan. The assumptions were developed based on the draft Specific Plan vision, land use map, and policies, and on market demand, existing conditions, and constraints. Overall, implementation of the project is anticipated to result in multi-family development at higher densities and allow for mixed-use development incorporating residential, office commercial, and/or retail commercial land uses.

Table 3-2
LAND USE DESIGNATION AND MAXIMUM DEVELOPMENT POTENTIAL

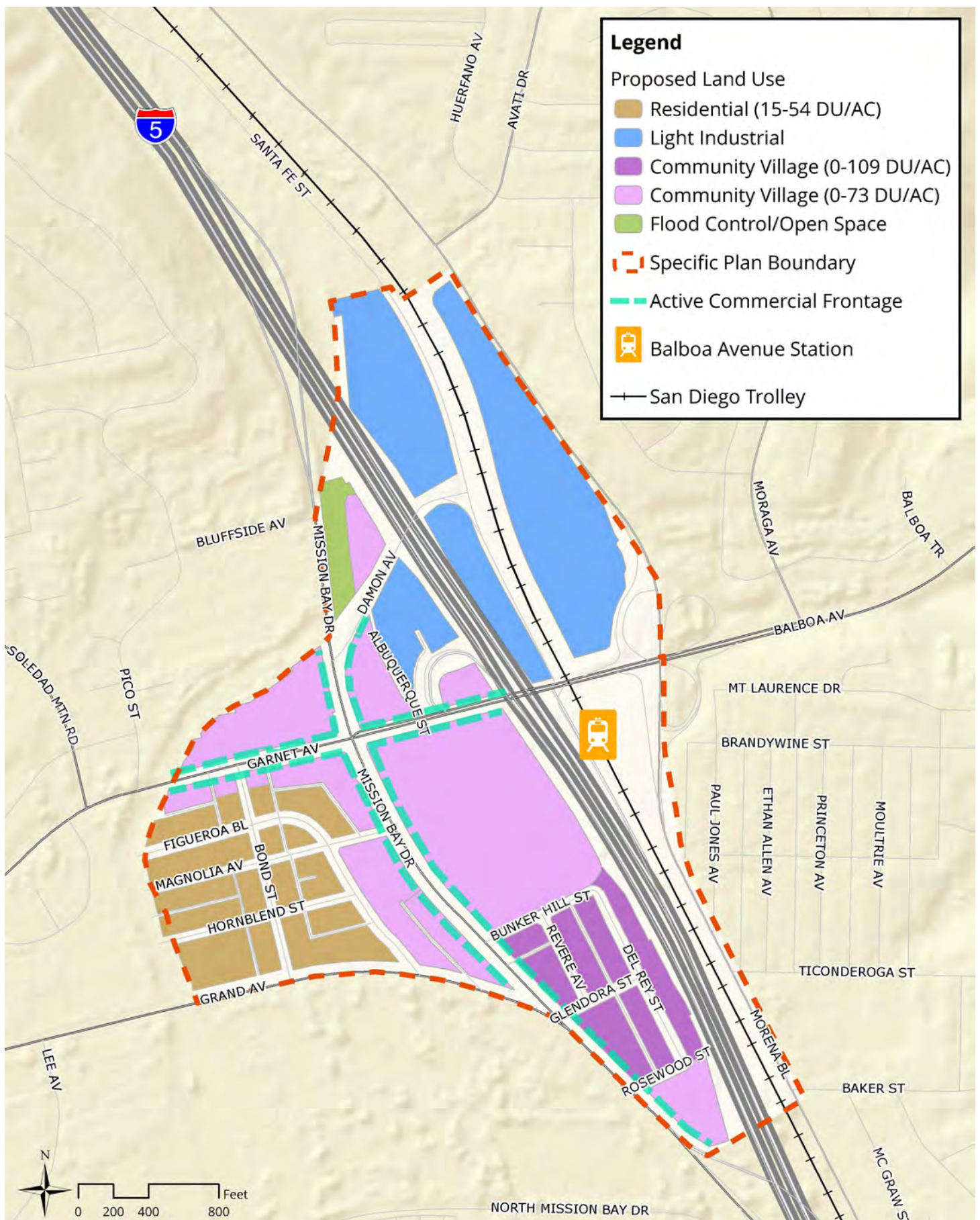
Proposed Land Use	Residential Dwelling Units	Floor Area (square feet)	Area (acres)
Residential	897	--	18
Community Village	3,832	669,800	55
Light Industrial	--	423,500	12
Flood Control/Open Space	--	--	2
Right-of-Way/Transit Station	--	--	123
TOTALS	4,729	1,093,300 1,037,757	210

Source: City of San Diego 2017

Table 3-3
COMPARISON OF ADOPTED AND PROPOSED FUTURE LAND USES

Land Use Type	Adopted Community Plans			Proposed BASASP		
	Acres	Floor Area (SF)	Dwelling Units	Acres	Floor Area (SF)	Dwelling Units
Single-Family	6	0	87	0	0	0
Multi-family	15	0	666	18	0	897
Commercial	38	494,057	468	49	570,721	3,832
Light Industrial	7	223,798	0	4	114,698	0
Office	4	115,339	0	2	43,192	0
Self-Storage	8	308,746	0	8	308,746	0
Parking Lot – Surface	3	0	0	0	0	0
Flood Control/Open Space	2	0	0	2	0	0
Transportation/ Right-of-way	117	400	0	117	400	0
Communications and Utilities	10	0	0	10	0	0
Vacant and Undeveloped Land	0.06	0	0	0	0	0
TOTALS	210	1,142,340	1,221	210	1,037,757	4,729

Source: City of San Diego 2017



Balboa Avenue Station Area Specific Plan

Proposed Land Use Map

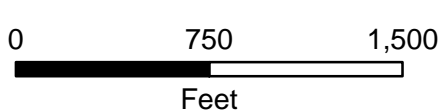
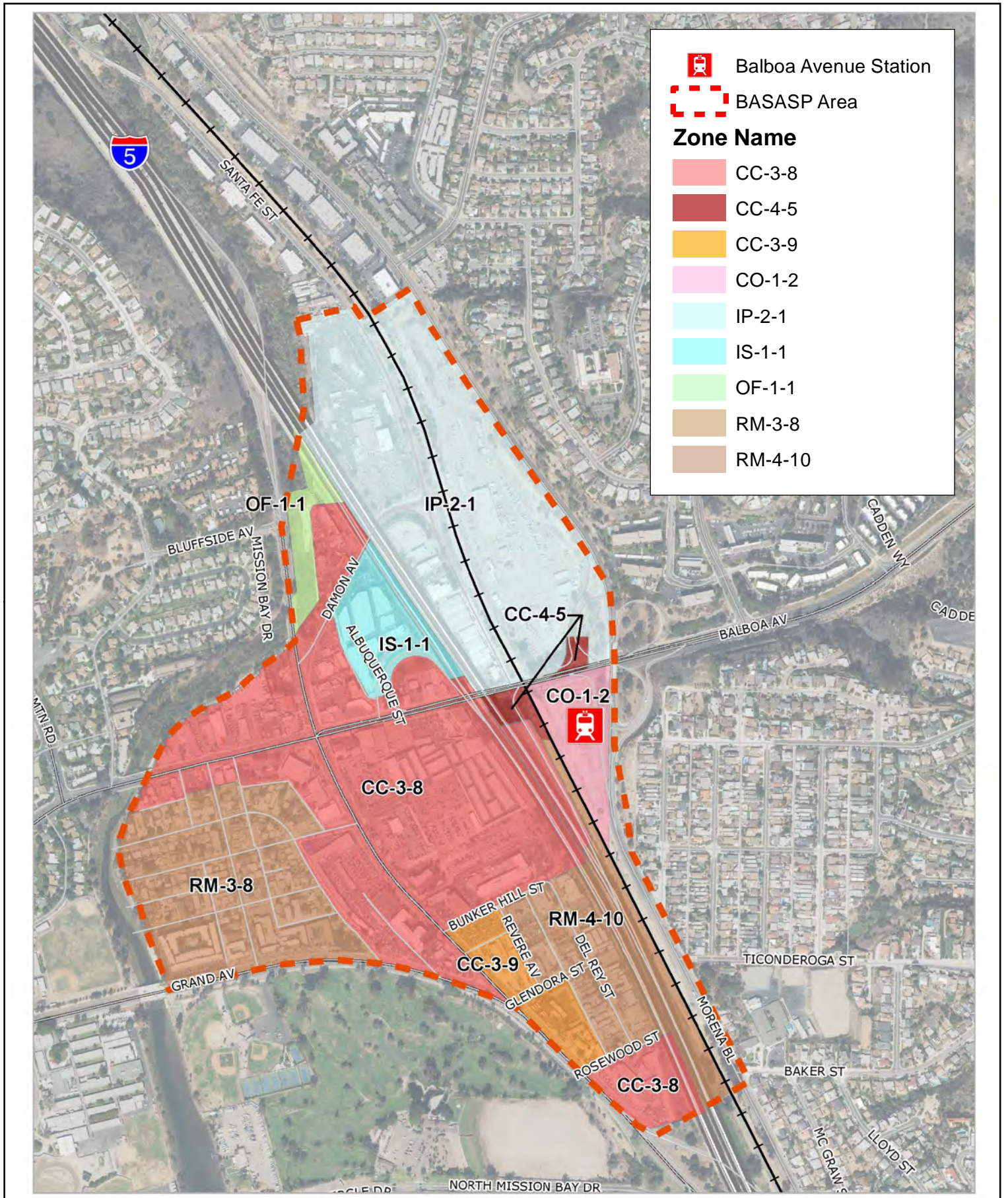


Figure 3-1



Balboa Avenue Station Area Specific Plan

Proposed Zoning Map

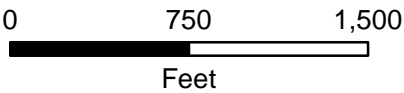
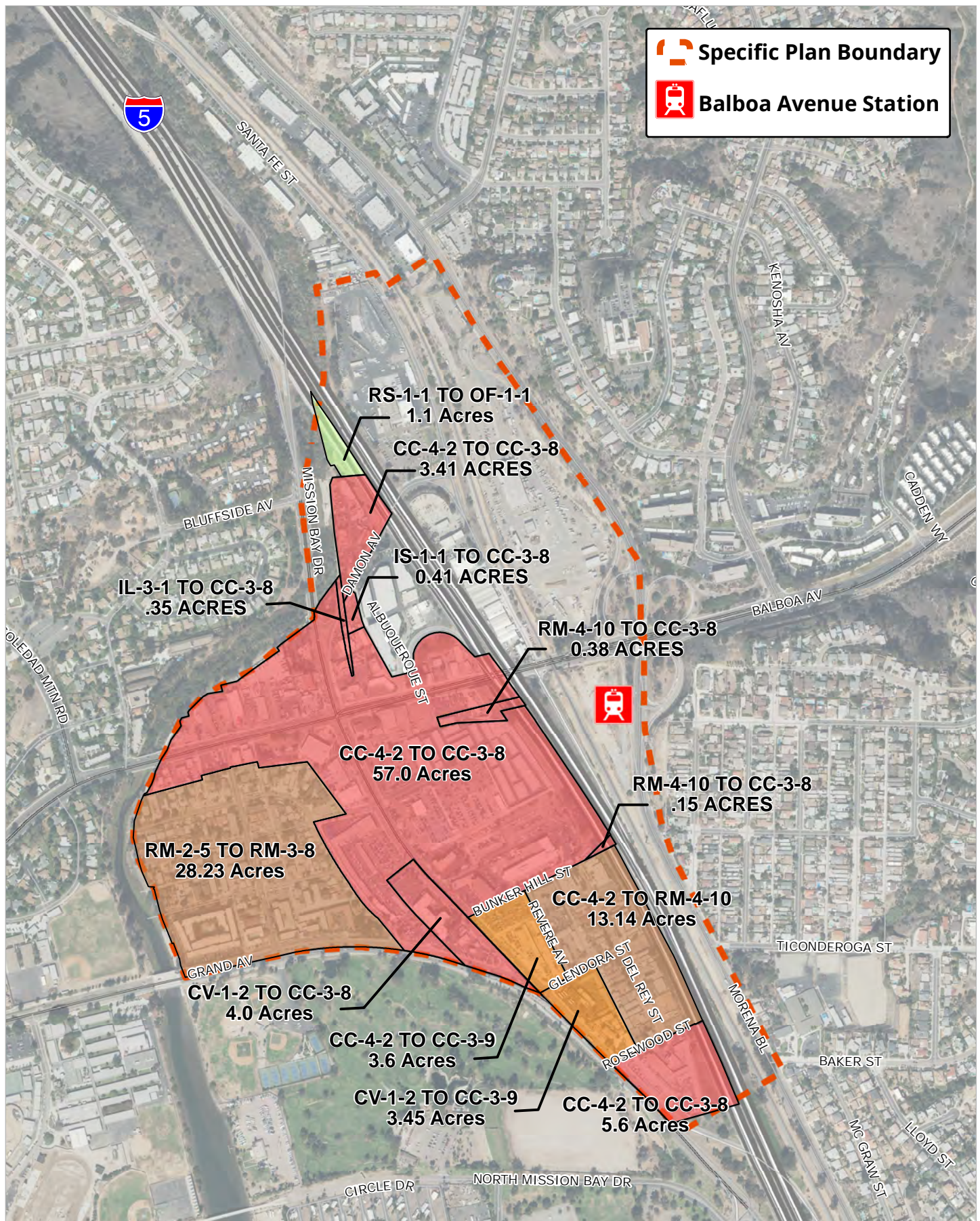


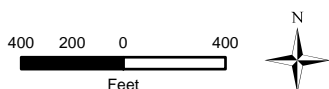
Figure 3-2



Balboa Avenue Station Area Specific Plan

Proposed Rezone Areas

Figure 3-3



Community Village

The Community Village land use designation is proposed to promote a cluster of activities and services that would establish a balance of housing, jobs, shopping, civic uses, and recreation, providing residents and employees with the option of walking, biking, or using transit in place of driving. The designation allows for housing in a mixed-use setting and residential units located above or behind ground-floor commercial storefronts. ~~Residential densities would range~~ Within a majority of the land designated for Community Village use, residential densities would be allowed up to 73 dwelling units per acre (du/ac). ~~The CC-3-8 zone is proposed to implement the Community Village land use designation that allows up to 73 du/ac. The Community Village land use designation (implemented by CC-3-8 zone) would be primarily applied to lands that front Mission Bay Drive and Garnet Avenue. A small portion of land located west of Mission Bay Drive between Bunker Hill Street and Rosewood Street is proposed to be designated Community Village with a higher residential density, allowing) and up to 109 du/ac. The Community Village land use designation allowing 109 du/ac would be implemented by the (CC-3-9 and RM-4-10 zones) within this land use designation (refer to Figure 3-1 and 3-2). Land designated Community Village allowing 109 du/ac and zoned RM-4-10 is located along Revere Avenue and Del Ray Street to promote a mixture of ground floor residential and commercial uses within this area. The Community Village land use designation (implemented by CC-3-8 zone) would be primarily applied to lands that front Mission Bay Drive and Garnet Avenue. Higher intensity, infill mixed-use development under the Community Village designation (implemented by the CC-3-9 and RM-4-10 zones) would be focused between Bunker Hill Street and Rosewood Street (refer to Figures 3-1 and 3-2). Additionally, The proposed BASASP establishes supplemental development regulations for lands designated Community Village that would allow for:~~

- ~~• Removal of the ground floor height requirement for properties in the Community Village designation in the Community Commercial (CC-3-8 and CC-3-9) zone;~~
- Residential uses on the ground-floor of properties designated Community Village which are not identified as Active Commercial Frontage as shown on Figure 3-1; and
- Requirement for a multi-use path and street trees on streets identified with Active Commercial Frontages in the Community Village designation.

Residential

The area designated Residential is generally bounded by Rose Creek on the west, Figueroa Boulevard on the east and north, and Grand Avenue on the south. The area is envisioned as the primary residential area with densities ranging from 15 to 54 du/ac. A variety of housing types is encouraged to accommodate additional density while maintaining the residential character of the neighborhood. Much of the BASASP residential development area is currently a mix of single-family and multi-family. The adopted Pacific Beach Community Plan designates the area for Multi-Family Residential (15 to 29 du/ac). The proposed BASASP encourages ~~new ideas for creating~~ affordable, senior-friendly housing and retrofitting existing structures with multi-units.

Light Industrial

Industrial land uses are located primarily in the Clairemont Mesa portion of the BASASP, north of Balboa Avenue between I-5 and Morena Boulevard. In Pacific Beach, industrial land uses are limited to a small area east of East Mission Bay Drive and west of I-5 and represent a very small portion of the BASASP area (2.3 acres) currently designated for such use in the adopted Pacific Beach Community Plan (City 1995). The proposed project would maintain the industrially designated lands land designated for industrial use within the BASASP area, which are intended to provide employment-related uses. A comprehensive update to the Clairemont Mesa Community Plan began in January 2017; as a result, the areas within the BASASP area that are designated Light Industrial in the Clairemont Mesa Community Plan area would remain unchanged in the proposed BASASP.

Flood Control/Open Space

Open Space occurs in Rose Canyon, which forms the western boundary of the BASASP area. Rose Creek flows north to south through San Clemente Canyon to the Rose Creek Inlet, a channelized portion of the creek which drains into Mission Bay (refer to Figure 1-2). The proposed BASASP would rezone approximately one acre of land north of Bluffside Avenue from the existing industrial zone to the OF-1-1 zone for the portion of Rose Creek that is located within the BASASP boundaries. In addition, the proposed BASASP provides guidelines in the Urban Design chapter that address the interface of development with the canyon and the creek to provide appropriate transitions to developed properties while maintaining the creek's natural features.

3.5.1.2 Land Use Policies

The Land Use chapter provides guidance which applies to the entire BASASP area. In general, policies provide support for pedestrian- and TOD in a village setting through the use of ground-floor activated spaces; the promotion of multi-modal transportation opportunities; and the integration of land uses that provide housing, employment, retail, and recreation opportunities. The policies also encourage smaller units and a range of housing types in the vicinity of transit, including the Balboa Avenue Station. Policies related to land use compatibility with regard to the air emissions and noise produced by the transportation corridors that bisect the BASASP area are also contained in the Land Use chapter.

3.5.2 Mobility Chapter

The Mobility chapter of the proposed BASASP identifies policies and recommendations for a balanced multi-modal transportation system that improves access within the area for all modes of travel. Policies would promote the establishment of a complete streets network that capitalizes on access to the Balboa Avenue Station, provides a walkable and pedestrian-friendly environment, and encourages traffic calming measures and bicycle facilities, where feasible. Mobility improvements are recommended along streets within the BASASP area to establish new and improved pedestrian, bicycle, and multi-use connections with a particular focus on providing connections to the Balboa Avenue Station and regional amenities such as Rose Creek Trail and Mission Bay Park.

3.5.2.1 Pedestrian Enhancements

Enhancements in the pedestrian network are proposed to promote walkability and safety, including new or widened sidewalks, larger pedestrian waiting areas, special paving, lighting, and landscaping. Figure 3-43, *Pedestrian Facilities*, illustrates locations within the BASASP area where there are opportunities to improve walkability and enhance pedestrian connections.

3.5.2.2 Bicycle Improvements

Existing bicycle networks in the BASASP area would be expanded and enhanced by incorporating Class I, II, III, and IV bike facilities along selected roadways, as previously identified in the City's Bicycle Master Plan and refined in the proposed BASASP. Specific policy recommendations include enhancing the Class I Rose Creek Trail, incorporating Class II bicycle lanes and class IV cycle tracks along key roadways, marking Class III bicycle route "sharrows" on neighborhood streets, and installing traffic calming features to facilitate bicycle travel on neighborhood streets identified as bicycle boulevards. Figure 3-54, *Bicycle Facilities*, illustrates locations within the BASASP area where there are opportunities to enhance the biking experience and connections.

3.5.2.3 Transit Enhancements

The proposed BASASP includes policies that encourage accessibility and the use of transit services available in the community, including the MTS Trolley Blue Line at the Balboa Avenue Station and bus service. The policies encourage SANDAG and MTS to enhance connectivity to transit by providing accommodations for bicycle share, car shares and electric vehicles and real-time transit information; ~~improve-improving~~ pedestrian links to transit by enhancing sidewalks and supporting the construction of a pedestrian and bicycle connection over I-5; ~~provide-providing~~ curb extensions at bus stops, where feasible; and ~~improve-improving~~ shelters, seating, lighting, trash receptacles, lighting, and signage at bus stops.

3.5.2.4 Street Improvements

The BASASP proposes a number of street and intersection improvements that are designed to support multi-modal access to the Balboa Avenue Station and improve travel through the BASASP area. Many policies are proposed in the BASASP to achieve the goal of increased multi-modal access which would encourage opportunities to slow traffic and increase safety, minimize potential conflicts between different modes of travel, provide the infrastructure needed for electric vehicles, and encourage infrastructure for autonomous vehicles. In addition, specific improvements are recommended along major streets within the BASASP area including modifications to intersections to reduce conflicts and improve operations (i.e., Mission Bay Drive and Grand Avenue), removal of parking to add bicycle lanes (i.e., Mission Bay Drive), striping bike lanes (i.e., Balboa Avenue/Garnet Avenue, Morena Boulevard, and Grand Avenue), adding multi-purpose paths and cycle tracks (i.e., Mission Bay Drive, Morena Boulevard, Santa Fe Street, and Damon Avenue), adding a vehicle lane (i.e., Grand Avenue and Garnet Avenue), and adding bicycle boulevards (i.e., Magnolia Avenue). The BASASP depicts typical cross-sections of major roadways where mobility improvements are proposed.

3.5.3 Urban Design Chapter

The Urban Design chapter envisions pedestrian-oriented development through building designs and streetscapes that support pedestrian activity. In addition to these over-arching goals, the Urban Design chapter establishes a broad range of policies intended to maintain and enhance the overall character of the community. These policies fall into the following categories: building design, relationship to Rose Creek, gateways and wayfinding signage, and the public realm. Building design within the BASASP area would allow buildings to be placed along the street edge, place parking behind structures, and incorporate public spaces. The Urban Design chapter also provides policies to enhance the pedestrian experience and character of the community. The proposed BASASP would promote gateways that would contribute to community identity and provide a wayfinding program, with a particular focus on connections to the Balboa Avenue Station. Finally, policies within the Urban Design chapter would help transform the public realm into a pedestrian-friendly environment by creating more public space along the streetscape. Key policies related to the public realm include providing street trees to create a uniform character, incorporating low-impact design features to treat runoff, using native or naturalized plant species in the streetscapes and project designs, integrating pedestrian scale lighting to delineate walkways, encouraging parking areas that minimize exposure of parked cars to public views, and other design features that would create a pleasant and inviting environment for residents, businesses, and visitors.

3.5.4 Recreation Chapter

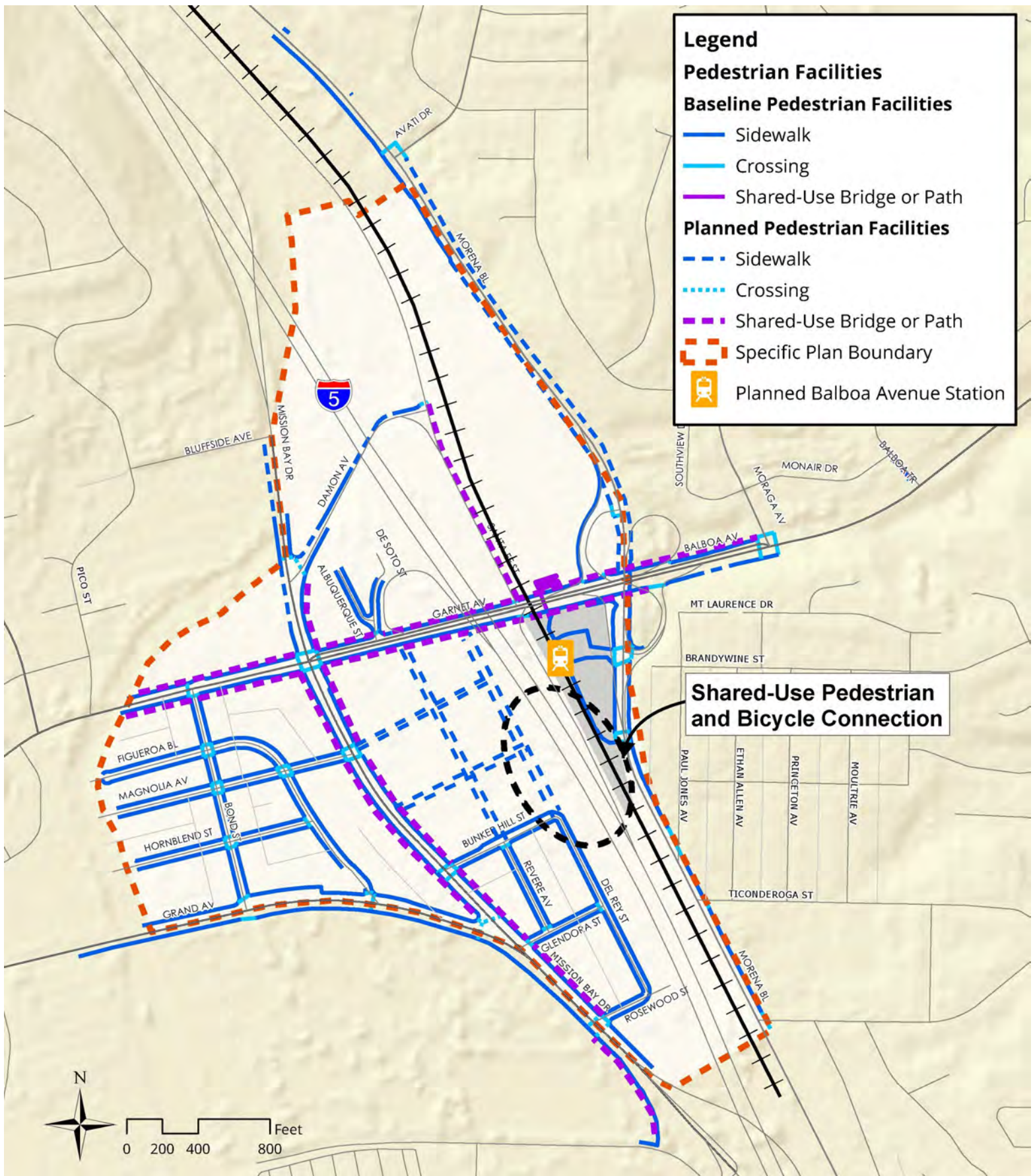
The Recreation chapter is intended to assure that the recreational needs of the community are met, with a particular focus on enhancing and creating connections to Mission Bay Park and Rose Creek. The proposed BASASP identifies policies for future park and recreation facilities within the BASASP area that would increase the amount of park and recreation land in the community. The proposed BASASP identifies a potential recreation site north of Damon Avenue and east of Mission Bay Drive to be used as a pocket park or plaza space and a bike repair station adjacent to the Rose Creek Trail. The proposed BASASP also identifies multi-modal connectivity enhancements that would improve access to Mission Bay Park, in particular the De Anza Cove area, for the existing and future residents of the BASASP area, as described in the Mobility chapter.

3.5.5 Infrastructure and Public ~~Utilities-Facilities~~ Chapter

The BASASP area has much of the basic infrastructure and utilities needed to serve existing and future development. The Infrastructure and Public ~~Utilities-Facilities~~ chapter describes the existing facilities and services available within the BASASP area, including water, wastewater, storm water, solid waste, communications/energy services, schools, police and fire/emergency services, and libraries. Although specific policies are not identified in the proposed BASASP, all public and private development would be required to comply with the LDC requirements directed at the provision of adequate infrastructure to serve future development projects within the BASASP area.

3.5.6 Conservation Chapter

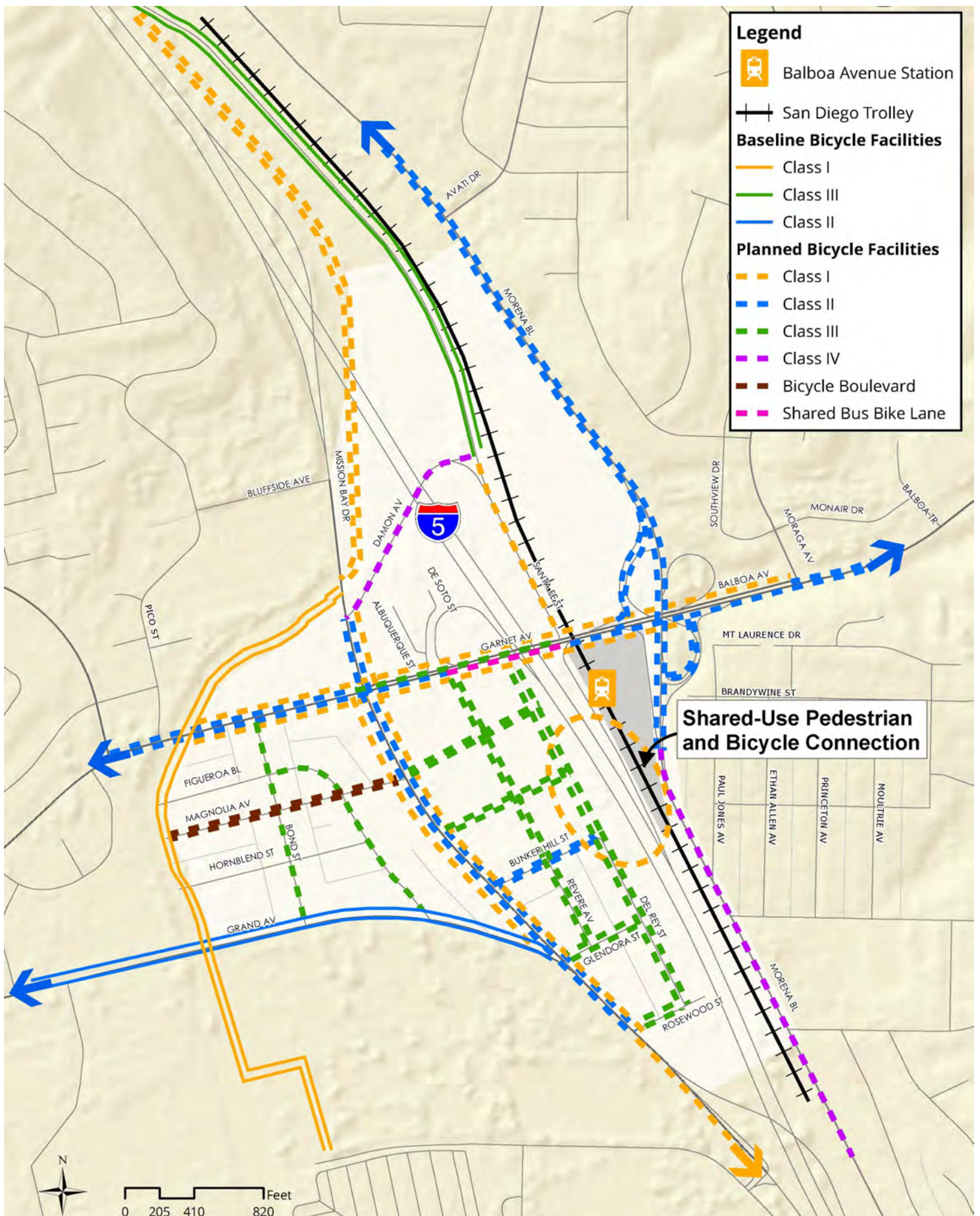
The Conservation chapter contains policies regarding sustainable development, urban runoff management, coastal resources, and cultural resources. The concepts of conservation and



Balboa Avenue Station Area Specific Plan

Pedestrian Facilities

Figure 3-4



Balboa Avenue Station Area Specific Plan

Bicycle Facilities

Figure 3-5

sustainability address the relationship of the built environment to the natural environment with the objective of achieving environmental benefits through energy and resource conversation. Conservation goals for the proposed BASASP would guide implementation of General Plan and Climate Action Plan (CAP) policies by using strategies identified within the BASASP to reduce greenhouse gas (GHG) emissions. Those conservation policies include implementing pedestrian and bicycle infrastructure improvements in Transit Priority Areas (TPAs) to increase commuter walking and bicycling opportunities; supporting higher density/intensity housing and employment development to increase transit ridership; encouraging the integration of energy and water conservation features into buildings; and minimizing the production of municipal solid waste. The chapter also addresses urban runoff management by encouraging the incorporation of low impact development (LID) practices into building design and site plans to protect water quality. With regard to coastal resources, policies in the Specific Plan recognize its location within the Coastal Zone and the need to enhance public access to open space and parklands and to protect the marine and wetland environments by encouraging site designs that are consistent with the land use adjacency guidelines of the City's Multiple Species Conservation Program (MSCP) for properties adjacent to Rose Creek.

3.6 Discretionary Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to approve or deny a project. The following discretionary actions comprise the ~~project~~ proposed BASASP analyzed within this PEIR (Table 3-~~43~~, *Proposed Discretionary Actions*).

Table 3-~~43~~
PROPOSED DISCRETIONARY ACTIONS

City of San Diego
• Certification of PEIR
• Approval of the BASASP
• <u>Amendment to the General Plan</u>
• Amendment to Pacific Beach Community Plan/LCP
• <u>Amendment to the Clairemont Mesa Community Plan</u>
• Approval of Rezone
California Coastal Commission
• Certification of the LCP Amendment

The Planning Commission will review the discretionary actions listed above associated with the proposed BASASP and provide a recommendation to the City Council, which will consider and make a decision on the proposed BASASP and associated discretionary actions. Once the City Council has acted upon each of the discretionary approvals associated with the proposed BASASP, the California Coastal Commission (CCC) will review the project for certification of the LCP Amendment.

3.6.1 Community Plan Amendment

A Community Plan Amendment (CPA) is proposed to amend figures and text within the Pacific Beach Community Plan/LCP to be consistent with the proposed land use and mobility recommendations of the BASASP. Specifically, the CPA would redesignate land from Single Family Residential, Multiple Family Residential, and Commercial-4 (as shown in Figure 2-1) to Residential (15-54 du/ac),

Community Village (0-73 du/ac), and Community Village (0-109 du/ac), as reflected in Figure 3-1. The Light Industrial-designated areas within the Pacific Beach Community Plan area along Damon Avenue and Albuquerque Street and all industrial lands within the Clairemont Mesa Community Plan area would not be modified by the CPA. Additionally, the CPA includes revisions to the Street Classifications map to reclassify Garnet Avenue west of Mission Bay Drive from a 6-lane Major to a 4-lane Major.

A CPA is proposed to amend figures and text within the Clairemont Mesa Community Plan to be consistent with the proposed mobility recommendations of the BASASP. Specifically, the CPA would include the reclassification of Morena Boulevard from a 4-Lane Major to a 3-Lane Collector. The CPA would also reclassify Balboa Avenue from a 6-lane major to a 5-lane major in the vicinity of the Balboa Avenue Trolley Station, and a 4-lane major east of Moraga Avenue. These changes would be reflected in the Community Plan Street Classification Map. Additionally, the Community Plan Recommended Bikeway map is proposed to be amended to be consistent with the proposed Class IV Cycle Track identified for Morena Boulevard in the Mobility Chapter of the BASASP.

3.6.2 Rezone

Concurrent with the adoption of the proposed BASASP and amendment of the Pacific Beach Community Plan/LCP, the zoning for the portion of the BASASP area is proposed to be rezoned changed from Residential (RM-2-5), Commercial (CC-4-2 and CV-1-2), and Industrial (IL-3-1) to Residential (RM-3-8 and RM-4-10), Commercial (CC-3-8 and CC-3-9), and Open Space (OF-1-1) to reflect the land use designations identified in the BASASP. The proposed zoning changes are is illustrated in Figure 3-32.

3.6.3 LCP Amendment

The BASASP area lies partially within the Coastal Overlay Zone boundary and, therefore, is under the jurisdiction of the CCC, which has the authority to review LCP amendments under the California Coastal Act. The Pacific Beach Community Plan and the applicable zoning regulations comprise its LCP. Once the City Council has acted upon each of the discretionary approvals associated with the proposed BASASP, the plan package will be sent to the CCC for certification.

3.7 Specific Plan Implementation

Plan implementation would require subsequent approval of public or private development proposals through both ministerial and discretionary reviews to carry out the land use plan and policies in the BASASP. These subsequent activities may be public (i.e., road/streetscape improvements, parks, public facilities) or private projects, and are referred to as future development or future projects in the text of this PEIR.

A non-inclusive list of discretionary actions that may be required for future implementing activities is shown in Table 3-54, *Potential Future Approvals for Projects within the BASASP Area*.

Table 3-45
POTENTIAL FUTURE APPROVALS
FOR PROJECTS WITHIN THE BASASP AREA

City of San Diego Actions
<ul style="list-style-type: none"> • Subdivision Maps • Discretionary Development Permits • Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications
Other Local Agency Actions
<ul style="list-style-type: none"> • SDAPCD permits to operate
State of California Actions
<ul style="list-style-type: none"> • Caltrans Encroachment Permits • Water Quality Certification Determination for Compliance with Section 401 • CDFW Concurrence on Wetland Deviations • CDFW Streambed Alteration Agreements • CDFW Memorandum of Understanding
Federal Actions
<ul style="list-style-type: none"> • USFWS Concurrence on Wetland Deviations • USACE CWA Section 404 Permits

Should a project within the BASASP area require a discretionary action, SB 743 provides an exemption from environmental review under CEQA for development that is consistent with a specific plan and eliminates or reduces the need to evaluate aesthetic and parking impacts as part of the environmental review (see PRC Section 21155.4). Future projects that are consistent with the proposed BASASP may be able to rely on this exemption if a development meets all of the following criteria:

- The project is a residential, employment center, or mixed-use project;
- The project is located within a TPA;
- The project is consistent with a specific plan for which an EIR was certified; and
- The project is consistent with an adopted sustainable communities strategy or alternative planning strategy.

The proposed BASASP would encourage the pursuit of grants and other sources of funding to offset the cost of improvements that are necessary to accommodate future development.

3.7.1 Specific Plan Administration

The proposed BASASP is subject to the procedures and standards established for specific plans by the San Diego Municipal Code (Section 122.0101-0107). The proposed BASASP is also subject to the California Government Code (Sections 65450 through 65457). In turn, all subsequent development proposals, such as tentative subdivision maps, site plans, improvement plans, and all public works projects, must be consistent with the adopted BASASP.

Amendments to the BASASP may be proposed as long as the proposed amendments are compatible and consistent with the purpose and goals of the BASASP and the General Plan. BASASP

amendments would be processed in accordance with San Diego Municipal Code Section 122.0105 (Decision Process for Land Use Plans) and would be subject to the same requirements for the adoption of a specific plan.

Subsequent development within the BASASP area would be processed through Processes One through Five, as established in Chapter 11 (Land Development Procedures) and permit types described in Chapter 12 (Land Development Reviews) of the LDC. Development applications within the Pacific Beach portion of the BASASP area would be evaluated for compliance with the proposed BASASP, including its supplemental development regulations, policies, and guidelines and the BASASP PEIR. As noted in Section 3.5.1, the proposed BASASP is focused on encouraging development within the Pacific Beach portion of the BASASP area. ~~Therefore, p~~Properties located within the Clairemont Mesa Community Plan area are not subject to the proposed BASASP ~~policies and supplemental development regulations~~ because Community Plan land uses within the Clairemont Mesa portion of the BASASP area would not change. Land uses changes within Clairemont Mesa will be considered comprehensively as part of the Clairemont Mesa Community Plan Update process.

4.0 HISTORY OF PROJECT CHANGES

4.1 Notice of Preparation and Project Initiation

In December 2015, the Planning Department began work on a California Strategic Growth Council grant-funded plan that identified potential land use and mobility improvements in Pacific Beach for the area near the Balboa Avenue Station. At the outset of the plan effort, the Planning Department prepared an analysis of the existing land use, mobility, urban design, and market conditions in the BASASP area to help identify opportunities and constraints. The existing conditions assessments identified underutilized properties along the commercial corridors of Mission Bay Drive and Garnet Avenue, and gaps in the pedestrian and bicycle infrastructure for the BASASP area. The plan effort recommended modifications and improvements to the roadway network in Pacific Beach to enhance pedestrian and bicycle facilities and allow for increased residential densities within a Transit Priority Area. In Clairemont Mesa, the plan effort recommended reconfiguration of Morena Boulevard to a three-lane roadway south of Balboa Avenue to allow for improved pedestrian and bicycle facilities along the corridor.

The Notice of Preparation (NOP) for the PEIR was issued on July 5, 2017. A scoping meeting was held on July 18, 2017 to gather agency and public input on the scope and content of the PEIR. Written comments were also received during the 30-day public comment period and are included in Appendix A. Potentially significant concerns and issue areas were defined based on the initial analysis of the environmental setting and baseline conditions, and comments on the NOP, and are analyzed as part of this PEIR.

4.2 Community Outreach and Plan Development

The community engagement process began in December 2015 and included the formation of two ad hoc subcommittees by the respective Community Planning Groups for Clairemont Mesa and Pacific Beach. Each subcommittee held four meetings between December 2015 and July 2017 to review existing conditions, land use, urban design, and mobility recommendations. In addition to regular meetings with the subcommittees, online engagement, regular updates to the Community Planning Groups, and attendance at pop-up outreach events in the community allowed City staff to solicit feedback on various options for land use, mobility, and urban design recommendations.

Through the planning and outreach process, the Planning Department proposed increasing residential densities along the commercial corridors of Mission Bay Drive and Garnet Avenue, and within the residential land between Rose Creek, Figueroa Boulevard, Grand Avenue, and Garnet Avenue. Land designated for industrial use within the BASASP area remained unchanged through the process. Additionally, the northern boundary of the Specific Plan area was revised to remove industrial land north of Avati Drive. City staff evaluated varying changes to the circulation network, including reclassifications of Garnet Avenue and Morena Boulevard to enhance pedestrian and bicycle access within the community and to the Balboa Avenue Station.

In January 2017, the Planning Department began work on a comprehensive update to the Clairemont Mesa Community Plan. Approximately 78 acres of the BASASP area is located within the Clairemont Mesa community planning area. It was decided that land use changes within the Clairemont Mesa community planning area would be addressed with the comprehensive update. The community plan update process will review all land uses within Clairemont Mesa as a whole to comprehensively address the appropriate areas of change in the Clairemont Mesa community. As a result, the BASASP will maintain the adopted land uses along Morena Boulevard within Clairemont Mesa, and land within Clairemont Mesa is not subject to the proposed BASASP supplemental development regulations.

5.0 ENVIRONMENTAL ANALYSIS

5.1 Land Use

5.1.1 Existing Conditions

5.1.1.1 Existing Land Use

The BASASP area encompasses a total of approximately 210 acres (0.33 square miles) and is bounded by Rose Creek on the west, Morena Boulevard on the east, Grand Avenue and Mission Bay Drive on the south, and Avati Drive on the north (refer to Figure 1-2). The BASASP area is predominantly urbanized and developed with commercial, office, light industrial, transportation, utility storage, and open space as shown in Figure 5.1-1, *Existing Land Use Map*. The future site of the Balboa Avenue Station, which is currently under construction in the BASASP area, is adjacent to I-5, LOSSAN rail corridor, Balboa Avenue, and Morena Boulevard. Within 0.5 mile of the Balboa Avenue Station site, approximately 38 percent of the area features transportation uses (i.e., freeways, roads, railways) and 24 percent of the area contains single-family residential, while multi-family residential and commercial uses comprise 8 percent and 7 percent of the area, respectively, according to the Mid-Coast Corridor Transit Project EIR/EIS (SANDAG 2014).

Commercial uses within the BASASP area are generally located on the west side of I-5 and include car dealerships, automotive services, restaurants, hotels, and other retail and service businesses. Industrial uses within the BASASP area are generally located along Morena Boulevard and Santa Fe Street on the east side of I-5 and north of Balboa Avenue. Industrial uses include the City's Rose Creek Operations Yard, SDG&E facility, and several warehouses. Residential uses are primarily located within the western portion of the BASASP area south of Garnet Avenue and west of Mission Bay Drive. Residences are also located in the southwestern portion of the BASASP, east of I-5 and along Del Rey Street. Rose Creek runs north-south along the western boundary of the BASASP area, with portions that meander within the project area. The Rose Creek Trail runs along the eastern side of Rose Creek between Mission Bay Drive and Grand Avenue.

In addition to the development described above, major regional transportation corridors bisect the BASASP area, including I-5 and the LOSSAN rail corridor. I-5 bisects the BASASP area in a north-south alignment; the portion of the BASASP area east of I-5 occurs within the Clairemont Mesa community, and the west side of I-5 is located within the Pacific Beach community. Other major roadways in the BASASP area include Balboa Avenue, Mission Bay Drive, Garnet Avenue, Grand Avenue, and Morena Boulevard.

Table 5.1-1, *Existing Land Use Distribution Summary*, summarizes the existing land use distribution within the BASASP area.

**Table 5.1-1
EXISTING LAND USE DISTRIBUTION SUMMARY**

Land Use	Acres	Floor Area (sf)	Dwelling Units
Single-family Residential	7	--	91
Multi-family Residential	16	--	672
Commercial	44	677,806	--
Light Industrial	4	109,100	--
Office	5	115,339	--
Transportation/Utilities/Parking	131	--	--
Open Space/Vacant	3	--	--
TOTAL	210	902,245	763

5.1.2 Regulatory Framework

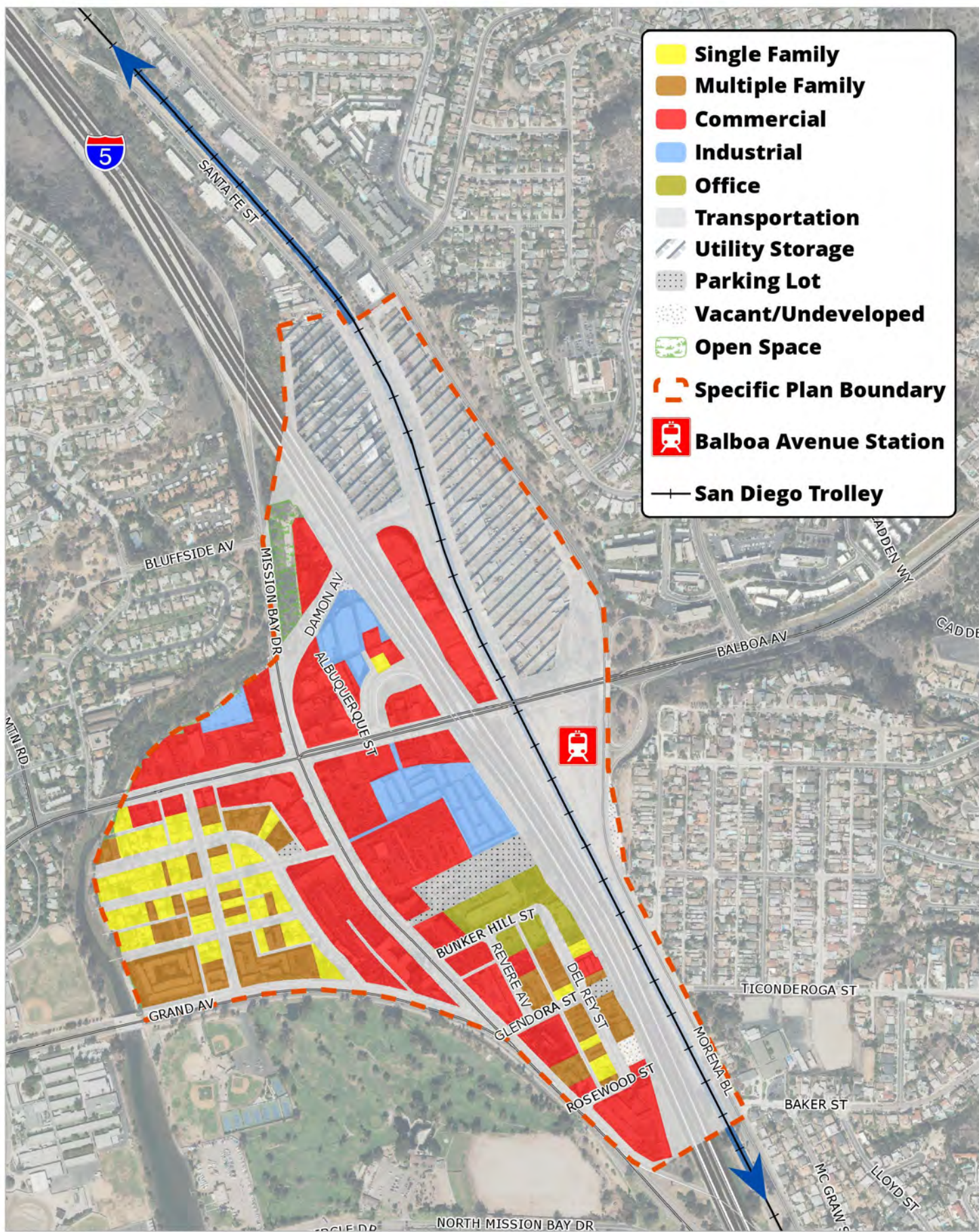
The following discussion briefly describes land use plans, ordinances, and regulations that apply to the proposed BASASP and future projects implemented under the proposed BASASP, including the General Plan, the adopted Pacific Beach Community Plan, Clairemont Mesa Community Plan, Land Development Code (LDC), MSCP Subarea Plan, California Coastal Act, and the Regional Plan.

5.1.2.1 City of San Diego General Plan

A comprehensive update of the City's General Plan was adopted in 2008, incorporating the City of Villages strategy, which was developed and adopted as part of the Strategic Framework Element in 2002. The Strategic Framework Element represented the City's new approach for shaping how the City will grow while attempting to preserve the character of its communities and its most treasured natural resources and amenities. It was developed to provide the overall structure to guide the General Plan update and future community plan updates and amendments, as well as the implementation of an action plan.

Since the majority of the City is developed, the General Plan recognizes that infill development and redevelopment will play an increasingly significant role in providing needed housing, jobs, and services in the City's communities. Guidance for how this development should occur is provided by the City of Villages strategy. Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat, and focus development in areas with available public infrastructure.

The General Plan includes 10 elements that are intended to provide guidance for future development. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic Preservation Element; and (10) Housing Element.



Balboa Avenue Station Area Specific Plan

Existing Land Use Map

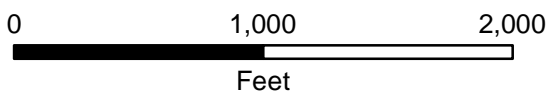


Figure 5.1-1

Land Use and Community Planning Element

The Land Use and Community Planning Element provides overarching policies to integrate the City of Villages strategy, and guide the provision of public facilities while accommodating planned growth. Policies within this Element, in combination with other elements, also protect coastal resources and ensure consistency with zoning and development regulations (e.g., LDC).

The Land Use and Community Planning Element of the City's General Plan is largely seen as the structure and framework for developing community plans and amendments thereto. When appropriate, policies call for community plans to further identify appropriate land uses to meet the goals set by the General Plan and City of Villages strategy. The policies also indicate that mixed-use areas, villages, and community-specific policies are developed with public input and involvement. Specific policies pertaining to the establishment of community villages are contained in this element of the General Plan.

Village Propensity

The Village Propensity Map in the Land Use Element of the General Plan (see General Plan Figure LU-1) illustrates existing areas that already exhibit village characteristics and areas that may have a propensity to develop as village areas. General Plan Figure LU-1 indicates that the central portion of the BASASP area possesses a moderate to high potential for village development, as described in the General Plan. Factors considered in locating village sites and ranking village propensity include community plan-identified capacity for growth; existing public facilities or an identified funding source for facilities; an existing or an identified funding source for transit service; community character; and environmental constraints (City 2008a). Village propensity also takes into consideration the location of parks, fire stations, and transit routes. Applicable policies are contained in Table 5.1-2, *Land Use and Community Planning Element Policies Related to Villages*.

**Table 5.1-2
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO VILLAGES**

Policy	Description
LU-A.1	<p>Designate a hierarchy of village sites for citywide implementation.</p> <ul style="list-style-type: none"> c. Designate Neighborhood, Community, and Urban Village Centers, as appropriate, in community plans throughout the City, where consistent with public facilities adequacy and other goals of the General Plan. d. Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed-use development. Include some combination of: residential above commercial development, employment uses, commercial uses, and higher density-residential development.
LU-A.2	Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired community character, with input from recognized community planning groups and the general public.

**Table 5.1-2 (cont.)
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO VILLAGES**

Policy	Description
LU-A.3	Identify and evaluate potential village sites considering the following physical characteristics: <ul style="list-style-type: none"> • Shopping centers, districts, or corridors that could be enhanced or expanded; • Community or mixed-use centers that may have adjacent existing or planned residential neighborhoods; • Vacant or underutilized sites that are outside of open space or community-plan designated single-family residential areas; • Areas that have significant remaining development capacity based upon the adopted community plan; and • Areas that are not subject to major development limitations due to topographic, environmental, or other physical constraints.
LU-A.4	Locate village sites where they can be served by existing or planned public facilities and services, including transit services.
LU-A.5	Conduct environmental review and focused study during the community plan update process, of potential village locations, with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design.
LU-A.6	Recognize that various villages or individual projects within village areas may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature.
LU-A.7	Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. <ol style="list-style-type: none"> Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services Evaluate the quality of existing and planned transit service.
LU-A.8	Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.
LU-A.9	Integrate public gathering spaces and civic uses into village design.
LU-A.10	Design infill projects along transit corridors to enhance or maintain a "Main Street" character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.
LU-A.11	Design and evaluate mixed-use village projects based on the design goals and policies contained in the Urban Design Element.

Source: City 2008a

Community Plan Amendments

The Land Use and Community Planning Element contains three goals related to amending community plans, which are applicable to the project since a community plan amendment (CPA) is required for the proposed BASASP:

- Approve plan amendments that better implement the General Plan and community plan goals and policies.
- Clearly define the process for amendments to community plans.
- Allow for changes that will assist in enhancing and implementing the community's vision.

Community plans are important because they contain specific policies that protect community character. Future public and private projects are evaluated for consistency with policies in the community plans. The specific policies in the Land Use and Community Planning Element that apply to amendments to community plans throughout the City are included in Table 5.1-3, *Land Use and Community Planning Element Policies Related to Plan Amendments*.

**Table 5.1-3
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO PLAN AMENDMENTS**

Policy	Description
LU-D.1	Require a General Plan and community plan amendment for proposals that involve: a change in community plan adopted land use or density/intensity range; a change in the adopted community plan development phasing schedule; or a change in plan policies, maps, and diagrams.
LU-D.2	Require an amendment to the public facilities financing plan concurrently with an amendment to the General Plan and community plan when a proposal results in a demand for public facilities that is different from the adopted community plan and public facilities financing plan.
LU-D.3	Evaluate all privately-proposed plan amendment and City-initiated land use designation amendment requests through the plan amendment initiation process and present the proposal to the Planning Commission or City Council for consideration.
LU-D.4	During a community plan update process, community plan amendment requests will be accepted until the final land use scenarios have been established.
LU-D.5	Maintain and update on a regular basis a database of land use plan amendments approved by the City in order to create an annual report for tracking of land use plan amendments.
LU-D.8	Require that General Plan and community plan amendment initiations be decided by the Planning Commission with the ability for the applicant to submit a request to the City Clerk for the City Council to consider the initiation if it is denied. The applicant must file the request with the City Clerk within 10 business days of the Planning Commission denial.
LU-D.10	Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows: a) the amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site design; and c) public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.

Table 5.1-3 (cont.)
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO PLAN AMENDMENTS

Policy	Description
LU-D.11	Acknowledge that initiation of a plan amendment in no way confers adoption of a plan amendment, that neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.
LU-D.12	Evaluate specific issues that were identified through the initiation process, whether the proposed amendment helps achieve long term community goals, as well as any additional community-specific amendment evaluation factors.
LU-D.13	Address the following standard plan amendment issues prior to the Planning Commission decision at a public hearing related to: level and diversity of community support; appropriate size and boundary for the amendment site; provision of additional benefit to the community; implementation of major General Plan and community plan goals, especially as related to the vision, values, and City of Villages strategy; and provision of public facilities.

Source: City 2008a

Coastal Resources Planning

A portion of the BASASP area is within the Coastal Zone (refer to Figure 5.3-2). The City has the authority to issue Coastal Development Permits (CDPs) for areas of the Coastal Zone where the Coastal Commission has certified the Local Coastal Program (LCP) land use plan and related Implementation Program in the form of code regulations. These areas are known as “Coastal Commission certified areas” and include the communities of Pacific Beach and Clairemont Mesa. There are a number of policies that pertain to CPAs within the Coastal Zone, as noted in Table 5.1-4, *Land Use and Community Planning Element Policies Related to Coastal Resources*.

Table 5.1-4
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO COASTAL RESOURCES

Policy	Description
LU-E.1	Incorporate community-specific policies into Coastal Zone community plans during community plan updates and/or amendments to address the Coastal Act policies’ direction regarding biological resources and geologic stability, circulation, parking, beach impact area, public access, recreational opportunities, visitor-serving, and visual resources.
LU-E.2	Ensure consistency of all coastal planning policies with the regional, citywide, and other community-specific planning policies included in each General Plan Element.
LU-E.3	Ensure that community plans contain policies to implement Chapter 3 of the Coastal Act and that the Land Development Code contains provisions to fully implement those policies.

Source: City 2008a

Zoning Consistency

It is the City's practice to apply zoning that is consistent with community plan land use designations to ensure their implementation. To ensure consistency between the land use plans and implementing development regulations in the LDC, the General Plan features several policies, as noted in Table 5.1-5, *Land Use and Community Planning Element Policies Related to Zoning Consistency*.

**Table 5.1-5
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO ZONING CONSISTENCY**

Policy	Description
LU-F.1	Apply existing or new Land Development Code zone packages or other regulations as needed to better implement the policy recommendations of the General Plan; land use designations of the community plans; other goals and policies of the community plans; and community-specific policies and recommendations.
LU-F.2	Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.
LU-F.3	Create and apply incentive zoning measures to achieve the desired mix of land uses and public benefits. <ul style="list-style-type: none"> a. Continue to provide incentives to development proposals that contribute to the provision of affordable housing, environmental enhancement, urban design, and energy conservation, as well as those that provide public facilities and amenities over and above regulatory requirements. b. Ensure that the granting of development incentives does not result in an adverse impact upon health, welfare, and safety of the surrounding community or upon any designated cultural and/or historic resource. c. The provision of development incentives should be re-evaluated on a regular basis to be certain that the granting of incentives remains in proportion with the benefits derived.

Source: City 2008a

Balanced Communities

One of the goals of the Land Use and Community Planning Element of the General Plan is to encourage diverse and balanced neighborhoods and communities that offer housing for all income levels. Recent initiatives to increase the supply and distribution of affordable housing include the Inclusionary Housing Ordinance (adopted in 2003), the City of Villages strategy (2002), the Housing Element (2013), and the remainder of the General Plan (2008). The City of Villages strategy described above under *Village Propensity* also strives to increase housing supply and diversity through the development of compact, mixed-use villages in targeted areas. There are a number of policies that pertain to balanced communities, as noted in Table 5.1-6, *Land Use and Community Planning Element Policies Related to Balanced Communities*.

**Table 5.1-6
LAND USE AND COMMUNITY PLANNING ELEMENT POLICIES
RELATED TO BALANCED COMMUNITIES**

Policy	Description
LU-H.1	<p>Promote development of balanced communities that take into account community-wide involvement, participation, and needs.</p> <ul style="list-style-type: none"> a. Plan village development with the involvement of a broad range of neighborhood, business, and recognized community planning groups and consideration of the needs of individual neighborhoods, available resources, and willing partners. b. Invest strategically in public infrastructure and offer development incentives that are consistent with the neighborhood's vision. c. Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education. d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty. e. Provide affordable housing opportunities within the community to help offset the displacement of the existing population. f. Provide a full range of senior housing from active adult to convalescent care in an environment conducive to the specific needs of the senior population.
LU-H.2	Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration.
LU-H.3	Provide a variety of housing types and sizes with varying levels of affordability in residential and village developments.
LU-H.4	<p>Strive for balanced commercial development</p> <ul style="list-style-type: none"> a. Support communities' efforts to identify the desired business growth model for their area and implement a strategy to achieve that goal. b. Encourage greater opportunities for local ownership of businesses and/or assets. c. Ensure that commercial districts are balanced and do not exclude the retail, employment, and service needs of local residents. d. Encourage local employment within new developments and provide entrepreneurial opportunities for local residents. e. Assist existing business owners in accessing programs that can provide financial assistance and business consulting services. Such programs include Small Business Administration loans, façade renovation, and other Redevelopment Agency financial assistance. f. Consider, in redevelopment and community plan update and amendment processes, where businesses displaced by commercial gentrification can be relocated.
LU-H.6	Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.
LU-H.7	Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.

Source: City 2008a

Mobility Element

The Mobility Element contains policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the Element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system. The specific policies in the Mobility Element that apply to proposed BASASP are included in Table 5.1-7, *Mobility Element Policies Related to Multi-modal Transportation Improvements*.

**Table 5.1-7
MOBILITY ELEMENT POLICIES RELATED
TO MULTI-MODAL TRANSPORTATION IMPROVEMENTS**

Policy	Description
ME-A.1	Design and operate sidewalks, streets, and intersections to maximize pedestrian safety and comfort through a variety of street design and traffic management solutions.
ME-A.2	Design and implement safe pedestrian routes. <ul style="list-style-type: none"> a. Collaborate with appropriate community groups, and other interested private and public sector groups/individuals to design and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. b. Consider a range of improvements and programs such as wider and non-contiguous sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, street and pedestrian lighting, pedestrian trails, and educating children on traffic and bicycle safety.
ME-A.6	Work toward achieving a complete, functional, and interconnected pedestrian network. <ul style="list-style-type: none"> a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian-oriented and street lighting, ramps, stairways, and other facilities are implemented as needed to support pedestrian circulation. b. Link sidewalks, pedestrian paths, and multi-purpose trails into a continuous region-wide network where possible. d. Address pedestrian needs as an integral component of community and public facilities financing plan updates and amendments, other planning studies and programs, and the development project review process. e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.
ME-A.7	Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired. <ul style="list-style-type: none"> a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art, or other measures. b. Design site plans and structures with pedestrian-oriented features. c. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In busy urban areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design. d. Consider traffic calming measures to improve walkability

Table 5.1-7 (cont.)
MOBILITY ELEMENT POLICIES RELATED
TO MULTI-MODAL TRANSPORTATION IMPROVEMENTS

Policy	Description
ME-A.8	Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.
ME-B.2	Integrate regional transit planning with land use planning so that higher-frequency transit service serves: higher density residential or mixed-use areas; higher intensity employment areas and activity centers; and community plan-identified neighborhood, community and urban villages, and transit-oriented development areas.
ME-B.3	Design and locate transit stops/stations to respect neighborhood and activity center character, implement community plan recommendations, enhance the users' personal experience of each neighborhood/center, and contain comfortable walk and wait environments for customers.
ME-B.8	<p>Make transit planning an integral component of long range planning documents and the development review process.</p> <ul style="list-style-type: none"> a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment. f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.

Table 5.1-7 (cont.)
MOBILITY ELEMENT POLICIES RELATED
TO MULTI-MODAL TRANSPORTATION IMPROVEMENTS

Policy	Description
ME-C.1	<p>Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans.</p> <ul style="list-style-type: none"> a. Protect and seek dedication or reservation of right-of-way for planned transportation facilities through the planning and development review process. b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time. c. Identify streets or street segments where special design treatments are desired to achieve community goals. d. Identify streets or street segments, if any, where higher levels of vehicle congestion are acceptable in order to achieve vibrant community centers, increase transit-orientation, preserve, or create streetscape character, or support other community-specific objectives. e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.
ME-C.3	<p>Identify locations where the connectivity of the street network could be improved, where possible, through the community plan update and amendment process, and through discretionary project review.</p> <ul style="list-style-type: none"> a. Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts. b. Provide direct and multiple street and sidewalk connections within development projects, to neighboring projects, and to the community at large.
ME-F.2	<p>Identify and implement a network of bikeways that are feasible, fundable, and serve bicyclists' needs, especially for travel to employment centers, village centers, schools, commercial districts, transit stations, and institutions.</p> <ul style="list-style-type: none"> a. Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations. b. Implement bicycle facilities based on a priority program that considers existing deficiencies, safety, commuting needs, connectivity of routes, and community input. c. Recognize that bicyclists use all city roadways.
ME-F.3	<p>Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.</p>
ME-F.5	<p>Increase the number of bicycle-transit trips by coordinating with transit agencies to provide safe routes to transit stops/stations, to provide secure bicycle parking facilities, and to accommodate bicycles on transit vehicles.</p>

Source: City 2008a

Urban Design Element

Urban Design Element policies call for development that respects the City's natural setting; enhances the distinctiveness of neighborhoods; strengthens the natural and built linkages; and creates mixed-use, walkable villages throughout the City. The Urban Design Element addresses urban form and design through policies relative to San Diego's natural environment that work to preserve open space systems and target new growth into compact villages. Urban Design Element policies that pertain to local development within the BASASP area are contained in Table 5.16-1 under *Visual Effects and Neighborhood Character*.

Economic Prosperity Element

As stated in the Economic Prosperity Element,

The policies in this element are intended to improve economic prosperity by ensuring that the economy grows in ways that strengthen our industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in our communities (City of San Diego 2008a).

Additional highlighted General Plan policies from this Element are listed in Table 5.1-8, *Economic Prosperity Element Policies Related to Urban Villages*. No Prime Industrial Lands are currently designated in the BASASP area. Other Industrial Lands are designated in three areas within the BASASP area east of I-5, north of Balboa Avenue, and west of Morena Boulevard. Commercial development occurs mainly in the western portion of the BASASP area along Mission Bay Drive and Garnet Avenue/Balboa Avenue.

**Table 5.1-8
ECONOMIC PROSPERITY ELEMENT POLICIES RELATED TO URBAN VILLAGES**

Policy	Description
EP-A.1	Protect base sector uses that provide quality job opportunities including middle-income jobs; provide for secondary employment and supporting uses; and maintain areas where smaller emerging industrial uses can locate in a multi-tenant setting. When updating community plans or considering plan amendments, the industrial land use designations contained in the Land Use and Community Planning Element should be appropriately applied to protect viable sites for base sector and related employment uses.
EP-A.4	Include base sector uses appropriate to an office setting in Urban Village and Community Village Centers.
EP-A.6	Provide for the establishment or retention of non-base sector employment uses to serve base sector industries and community needs and encourage the development of small businesses. To the extent possible, consider locating these types of employment uses near housing. When updating community plans or considering plan amendments, land use designations contained in the Land Use and Community Planning Element should be appropriately applied to provide for non-base sector employment uses.
EP-A.7	Increase the allowable intensity of employment uses in Subregional Employment Areas and Urban Village Centers where transportation and transit infrastructure exist. The role of transit and other alternative modes of transportation on development project review are further specified in the Mobility Element, Policies ME-C.8 through ME-C.10.

**Table 5.1-8 (cont.)
ECONOMIC PROSPERITY ELEMENT POLICIES RELATED TO URBAN VILLAGES**

Policy	Description
EP-A.8	Concentrate more intense office development in Subregional Employment Areas and in Urban Villages with transit access.
EP-A.9	Efficiently utilize employment lands through increased intensity in “urban villages” and Subregional Employment Areas.
EP-A.10	Locate compatible employment uses on infill industrial sites and establish incentives to support job growth in existing urban areas.
EP-A.11	Encourage the provision of workforce housing within employment areas not identified as Prime Industrial Land that is compatible with wage structures associated with existing and forecasted employment.
EP-B.1	Increase the vitality of commercial areas, and provide goods and services easily accessible to residents and promote community identity. When updating community plans or considering plan amendments, apply the appropriate community plan commercial land use designations to implement the above policy.
EP-B.2	Encourage development of unique shopping districts that help strengthen community identity and contribute to overall neighborhood revitalization.
EP-B.3	Concentrate commercial development in Neighborhood, Community, and Urban Villages, and in Transit Corridors.
EP-B.5	Identify commercial retail and service areas in community plans to serve markets beyond the community.
EP-B.6	Promote economically vital neighborhood commercial districts that foster small business enterprises and entrepreneurship.
EP-B.8	Retain the City’s existing neighborhood commercial activities and develop new commercial activities within walking distance of residential areas, unless proven infeasible.
EP-B.12	Determine the appropriate mix and form of residential and commercial uses along Transit Corridors based on the unique character of the community, considering: the types and mix of uses that will complement adjacent neighborhoods, parcel size and depth, and the need to revitalize economically obsolete uses.
EP-B.16	<p>Evaluate the amount and type of commercial development that is desirable and supportable for a community during the community plan update process and in subsequent community plan amendments. Reduce excess commercially designated land by providing for appropriate reuse or alternative use. Consider re-designating commercial land characterized by commercial retail and service uses to residential or mixed-use where some or all of the following factors are present:</p> <ul style="list-style-type: none"> • Where the lot size or configuration is inadequate, or other site characteristics result in an inability to develop or sustain a viable commercial use; • Where site driveways could adversely affect traffic flow; • Where community facilities are accessible for residents; • Where the existing use is underutilized and there is an adequate supply of community serving commercial uses; • Where there is good transit, pedestrian, and bicycle connectivity with employment areas; or • Where it would not impact the viability for base sector use of any adjacent land identified as prime industrial land on Figure EP-1.
EP-K.7	Utilize redevelopment to eliminate or minimize land use conflicts that pose a significant hazard to human health and safety.

Source: City 2008a

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within this Element also apply to fire-rescue, police, wastewater collection and treatment, storm water infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, and disaster preparedness. There are no policies specifically related to urban villages.

Recreation Element

The goals and policies of the Recreation Element have been developed to take advantage of the City's natural environment and resources, to build upon existing recreation facilities and services, to help achieve an equitable balance of recreational resources, and to adapt to future recreation needs. The Recreation Element contains policies to address the challenge of meeting the public's park and recreational needs; the inequitable distribution of parks citywide, especially acute in the older, urbanized communities; and to work toward achieving a sustainable, accessible, and diverse park and recreation system. The Recreation Element also addresses alternative methods, or "equivalencies," to achieve city-wide equity where constraints make meeting City guidelines for public parks infeasible, or to satisfy community-specific needs and demands. The specific policies in the Recreation Element that apply to the proposed BASASP are included in Table 5.1-9, *Recreation Element Policies Related to Park and Recreation Land Uses*.

**Table 5.1-9
RECREATION ELEMENT POLICIES RELATED TO PARK AND RECREATION LAND USES**

Policy	Description
RE-A.3	Take advantage of recreational opportunities presented by the natural environment, in particular beach/ocean access and open space.
RE-A.6	Pursue opportunities to develop population-based parks. <ul style="list-style-type: none"> a. Identify underutilized City lands with potential for use as mini-parks, pocket parks, plazas, and community gardens. b. Encourage community participation in development and maintenance of City-owned mini-parks, pocket parks, plazas, and community gardens. c. Pursue acquisition of lands, as they become available, that may be developed as mini-parks, pocket parks or plazas.

Source: City 2008a

Conservation Element

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. San Diego's resources include, but are not limited to water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The specific policies in the Conservation Element that apply to the proposed BASASP are included in Table 5.1-10, *Conservation Element Policies Related to Development in the*

Vicinity of Sensitive Resources. Additional conservation policies are noted in Table 5.3-5 in Section 5.3, *Biological Resources*.

Table 5.1-10
CONSERVATION ELEMENT POLICIES RELATED TO
DEVELOPMENT IN THE VICINITY OF SENSITIVE RESOURCES

Policy	Description
CE-B.6	Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.
CE-C.2	Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans (see also Land Use Element, Policy LU-E-1).
CE-C.4	Manage wetland areas as described in Section H, Wetlands, for natural flood control and preservation of landforms.
CE-C.6	Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.
CE-C.8	Protect coastal vistas and overlook areas from obstructions and visual clutter where it would negatively affect the public's reasonable use and enjoyment of the resource.
CE-C.9	Develop an integrated system of pedestrian, bicycle, local transit and automobile access to the shoreline that will connect major coastal activity areas with a focus on the ocean and natural scenic corridors.
CE-E.2	Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.
CE-E.7	Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

Source: City 2008a

Noise Element

The Noise Element provides goals and policies to guide compatible land uses, and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. The specific policies in the Noise Element that apply to the BASASP area are included in Table 5.1-11, *Noise Element Policies Related to Noise and Land Use Compatibility*.

Table 5.1-11
NOISE ELEMENT POLICIES RELATED TO NOISE AND LAND USE COMPATIBILITY

Policy	Description
NE-A.1	Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.
NE-A.2	Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
NE-A.3	Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.

Table 5.1-11 (cont.)
NOISE ELEMENT POLICIES RELATED TO NOISE AND LAND USE COMPATIBILITY

Policy	Description
NE-A.4	Require an acoustical study consistent with Acoustical Study Guidelines (General Plan Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use-Noise Compatibility Guidelines (see PEIR Section 5.5, <i>Noise</i> , Table 5.5-1).
NE-A.5	Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.
NE-B.1	Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.
NE-B.2	Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise.
NE-B.3	Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.
NE-C.1	Use site planning to help minimize exposure of noise sensitive uses to rail corridor and Trolley line noise.
NE-E.1	Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land uses.
NE-E.2	Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.
NE-E.3	Encourage daytime truck deliveries to commercial uses abutting residential uses and other noise-sensitive land uses to minimize excessive nighttime noise unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours.
NE-E.4	Encourage commercial/entertainment uses to utilize operational measures that minimize excessive noise where it affects abutting residential and other noise-sensitive uses.
NE-E.6	

Source: City 2008a

Historic Preservation Element

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. The specific policies in the Historic Preservation Element that apply to BASASP area are included in Table 5.1-12, *Historic Preservation Element Policies Related to Land Use Plans*.

Table 5.1-12
HISTORIC PRESERVATION ELEMENT POLICIES RELATED TO LAND USE PLANS

Policy	Description
HP-A.2	<p>Fully integrate the consideration of historical and cultural resources in the larger land use planning process.</p> <ul style="list-style-type: none"> a. Promote early conflict resolution between the preservation of historical resources and alternative land uses. b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with property owners, community and historic preservation groups, land developers, Native Americans, and the building industry. c. Include historic preservation concepts and identification of historic buildings, structures, objects, sites, neighborhoods, and non-residential historical resources in the community plan update process. d. Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to complement community character. e. Make the results of historical and cultural resources planning efforts available to planning agencies, the public and other interested parties to the extent legally permissible.

Source: City 2008a

Housing Element

The separately adopted 2013–2020 Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The Housing Element includes objectives, policies, and programs for five major goals, including the provision of sufficient housing of all income groups, maintaining the safety and livability of the housing stock, streamlining processes for the creation of new housing development, promoting affordable housing, and cultivating the City as a sustainable model for development (City 2013b).

Climate Action Plan

The City adopted its CAP in December 2015. The CAP serves as mitigation for the City's 2008 General Plan (City 2015). The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan.

The City adopted its CAP Consistency Checklist in July 2016. The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Consistent with the intent of the CAP, the BASASP proposes new land use and zoning designation to increase capacity

for transit-supportive residential and employment densities within the Transit Priority Area (TPA). Implementation of the measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets.

5.1.2.2 Adopted Community Plans

The BASASP area is comprised of land within the Pacific Beach and Clairemont Mesa Community Plans. The adopted land uses within the BASASP area are shown on Figure 5.1-2, *Adopted Land Use*.

Pacific Beach Community Plan

The Pacific Beach Community Plan/LCP (1995 as amended through 2005) notes that the community strives to reconcile the duality of its roles as a visitor destination and a residential community, and that the desirable aspects of the community (e.g., the beach, bay, Kate Sessions Park, and scenic vistas) will be enhanced through improved identification and access, while negative impacts associated with increased traffic congestion will be minimized through provision of affordable and convenient public transit.

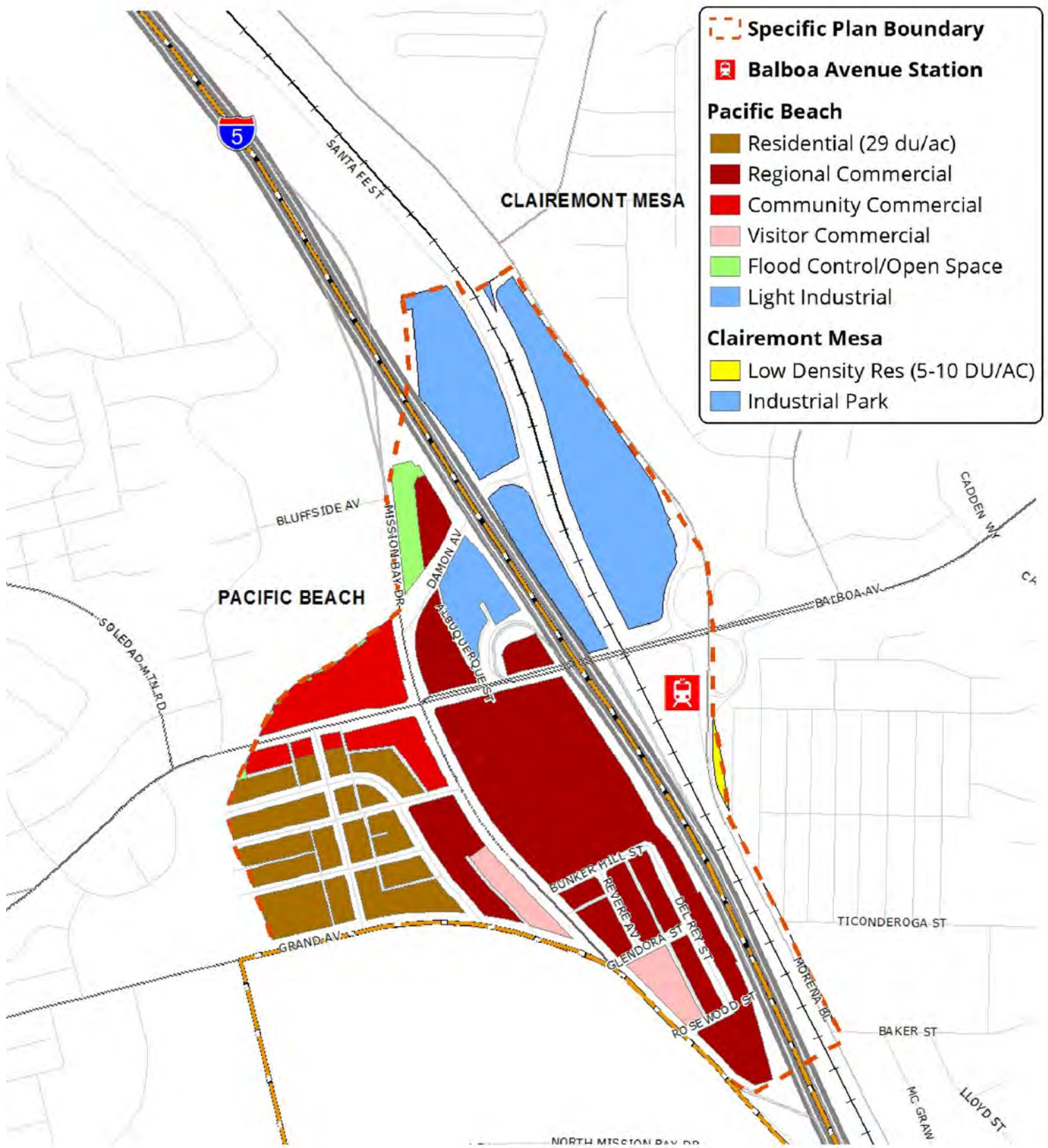
Overall land use goals identified in the Pacific Beach Community Plan are directed at promoting a mixture of commercial services; creating safe and pleasant pedestrian linkages; reducing traffic congestion by increasing the efficiency of public transit; enhancing existing public access to the beach, bay, and park areas; developing and maintaining beach and bay recreational facilities; and implementing design standards for development that complement the scale and character of the neighborhoods. Because the Pacific Beach community is heavily urbanized, the Pacific Beach Community Plan recognizes that most new development is expected to consist of redevelopment or infill development.

The plan contains seven policy elements which address: Circulation, Commercial Land Use, Industrial Land Use, Residential Land Use, Parks and Open Space, Community Facilities and Services, and Heritage Resources. Many of these elements contain policies that are applicable to the BASASP area because of its mix of land uses, proximity to transit, and relationship to Mission Bay Park. The Community Facilities and Services, and Heritage Resources elements do not contain policies that are directly relevant to the BASASP area, and are therefore not discussed further.

Circulation Element

The Circulation Element recognizes the Balboa Avenue, Garnet Avenue, Grand Avenue, and Mission Bay Drive as transit corridors with bus routes (see Figure 8 in the Community Plan). Both existing and future bicycle facilities along Balboa/Grand Avenues, as well as Rose Creek, are also noted in Figures 9 and 9a of the Pacific Beach Community Plan. Relevant policies are listed below:

- The City shall identify additional transit corridors in the Pacific Beach community as appropriate to support transit-oriented development policies. Transit corridors shall be limited to routes served by light rail, frequent City bus service or other forms of mass transit.
- The City shall improve the road network to facilitate traffic circulation without widening streets, and without disrupting the neighborhood development pattern, streetscape, or



Balboa Avenue Station Area Specific Plan

Adopted Land Use

0 750 1,500
Feet



Figure 5.1-2

pedestrian environment, all of which contribute to the community's character. All road improvements will, where possible, maintain sidewalks and landscaping.

- New development shall be designed to promote transit, bicycle, and pedestrian use.
- New development projects shall limit the number of curb cuts to the absolute minimum necessary (preferably one per property), unless precluded for safety reasons. Where possible, vehicular access shall be solely from alleys.
- The City shall promote the establishment of Park and Ride facilities on or near East Mission Bay Drive, particularly in proximity to the proposed trolley station at Morena Boulevard and Balboa Avenue.

Specific circulation proposals are identified in the Pacific Beach Community Plan, including the following that are applicable to the BASASP area:

- Upon construction of the light rail station at Balboa Avenue and Morena Boulevard/I-5, expand the existing Pacific Beach bus routes or establish a new route to provide service between the station, the proposed parking garages, and the community.
- Require new developments to provide transit stops, passenger waiting areas, bus turnouts, and bicycle racks, lockers, and other storage facilities as appropriate.
- In the long term, obtain the dedication of the required right-of-way on both sides of Garnet Avenue to increase to six lanes between Soledad Mountain Road and I-5, and to provide bike lanes, a landscaped entryway and landscaping as identified in Appendix D. Mitigation measures shall be provided during construction to address the impacts of increased sediment caused by grading. Measures should include catch basins and filtering systems or other necessary and effective measures. The bridge design should provide for minimal alterations to Rose Creek and its habitat.
- At the intersection of Garnet Avenue and Mission Bay Drive, add a second southbound to eastbound left turn lane and lengthen the storage length for the northbound right and left turn lanes.

Commercial Element

Commercial land use goals related to promoting a mixture of commercial uses and services, encouraging mixed-use development along transit corridors and enhancing commercial areas at the entryways to the community to reflect its relationship with Mission Bay and the Pacific Ocean are expressed in the Pacific Beach Community Plan with the following policies stated to achieve the goals are applicable to the BASASP:

- Specific commercial areas in Pacific Beach shall be designated for office, regional community, neighborhood, and visitor-serving commercial uses.
- Apply commercial zoning in Pacific Beach that will provide standards and definitive guidelines to be used for ministerial project review, and will further allow project design alternatives for the purpose of providing protection to adjacent residential landowners,

preserving community character, and ~~created~~ creating varied, aesthetic, and vibrant commercial areas.

- New commercial development along the identified transit corridors and in the core commercial areas shall incorporate pedestrian and transit-oriented features into project design.
- To promote transit and pedestrian use along the community's commercial spines, mixed use commercial projects shall be allowed within an increased residential density of up to 43 dwelling units per acre or shared parking as an incentive, only if designed as a transit-oriented development through a discretionary permit process.
- New commercial developments shall incorporate landscaping treatments as identified in the streetscape recommendations of this plan.

A specific commercial proposal in the Pacific Beach Community Plan includes designating the Mission Bay Drive commercial area within the BASASP area for regional-serving and visitor-serving commercial use and applying commercial zoning that provides for a mix of larger scale retail, wholesale, commercial service, hotel, and business/professional office uses. In the area designated for regional commercial uses, both large-scale retail, such as automobile dealerships, and small-scale retail, such as hotels and restaurants, shall be permitted. In the areas designated for visitor commercial uses, which includes the area closest to Mission Bay Park, only visitor-serving uses shall be permitted.

The Pacific Beach Community Plan recognizes the potential for TOD development within the community and outlines design standards that are recommended in the community's commercial areas to emphasize a pedestrian-oriented environment and reinforce the use of public transportation:

- Minimize building setbacks, bringing buildings close to sidewalks; locate parking to the rear of lots, off of the alleys.
- Articulate building facades to provide variety and interest through arcades, porches, bays and particularly balconies, which minimize a walled effect and promote activity on the street. Promote activity on balconies through such means as outdoor seating for restaurants.
- Orient primary commercial building entrances to the pedestrian-oriented street, as opposed to parking lots.
- Provide bus shelters at established bus stops.
- Provide bicycle racks in areas that are visible and easily accessible from identified bicycle routes.
- Provide, if space permits, public plazas or courtyards along pedestrian-oriented streets to serve residents and workers. Encourage public art in these areas where appropriate.

- Utilize parking structures instead of surface parking for larger commercial developments; locate retail uses on the street level of parking garages to preserve the life and activity at the street.

For commercial development within the Coastal Zone area of Pacific Beach, the Pacific Beach Community Plan refers to parking and signage standards and TOD design standards (noted above) to minimize impacts on coastal resources.

Industrial Element

Industrial land use policies apply to the area immediately west of I-5 near Damon Avenue and refer to the concept of allowing residential uses within this light industrial area of the community.

Residential Element

According to the Pacific Beach Community Plan, approximately 88 percent of the community features residential development, with the majority of the housing being single-family units. As a developed community, few undeveloped parcels exist for residential development. To implement its goals of having a balanced residential community in Pacific Beach, the following policies relevant to the BASASP area are noted:

- Maintain the residential scale of Pacific Beach and encourage development of residential units within transit corridors, especially along Garnet Avenue.
- Analyze existing multifamily development standards focusing on building size and parking requirements, particularly in transit corridors, to provide incentives, for encouraging affordable housing in the form of smaller (1-2 bedroom) units. Further consider options for allowing higher densities in transit corridors while maintaining the intensity of the underlying zone (e.g., by regulating the number of bedrooms).
- Require new development to conform to area-specific streetscape recommendations for landscape, lighting, sidewalk treatment and signage (identified in Appendix D) and to be implemented through the citywide landscape ordinance.

Parks and Open Space Element

This element of the Pacific Beach Community Plan recognizes the Rose Creek area as an open space feature in the Pacific Beach community. A specific proposal to designate the Rose Creek inlet and flood control channel as open space, and further develop the area adjacent to the floodway as a linear parkway with native riparian landscaping, as when pedestrian and bicycle paths, is noted in the plan.

Clairemont Mesa Community Plan

As noted in the Clairemont Mesa Community Plan (City 1989 as amended through 2011), Clairemont Mesa is an urbanized residential community with streetscape parkways and many neighborhoods overlooking Mission Bay and the Pacific Ocean. The adopted Clairemont Mesa Community Plan is divided into eight elements: Urban Design, Residential, Commercial, Industrial, Transportation, Open Space and Environmental Resources, Population-Based Parks and Recreation, and Community

Facilities. The relevant policies from the Industrial and Transportation elements are noted below; the other elements are not applicable to the BASASP area and are not addressed further in this section. The future light-rail station at Balboa Avenue and Morena Boulevard is noted throughout the plan. A comprehensive update to the Community Plan was initiated in 2017.

Industrial Element

The primary goal for industrial development is to provide high-quality office and industrial park development within the community and rehabilitate older developments. The policies also indicate a desire to decrease land use conflicts between industrial and residential or commercial uses. The element also expresses a desire to redevelop/rehabilitate the industrial uses along Santa Fe Street and Morena Boulevard to improve their physical appearance. Specifically, the Clairemont Mesa Community Plan calls for the development of industrial parks in the Rose Creek/Canyon area that contain research and development or professional offices/corporate headquarters which conform to current regulations. A desire for future development of the City Public Works service yard and SDG&E site with research and development industrial uses is also expressed. A number of design-specific recommendations for industrial development are contained in the policies.

Transportation Element

The primary goals for the transportation in the community are to provide a safe and efficient transportation system that accommodates the community's growth while minimizing effects on existing development. A desire to increase mobility through the development of a bicycle system, enhancement of the pedestrian network and provision of public transit are also stated objectives. Enhancing the community's image through streetscape improvements is also noted. Recommendations for street improvements in the Clairemont Mesa Community Plan include the widening of Balboa Avenue to a 6-lane major road through the BASASP area. In addition, the Clairemont Mesa Community Plan calls for a light-rail transit station where the Balboa Avenue Station is being constructed and indicates that bus service and bikeways would be routed to serve the new station to facilitate transfers.

5.1.2.3 Balboa Avenue Revitalization Action Program

The Balboa Avenue RAP implements a vision for pedestrian-oriented improvements to Balboa Avenue within Clairemont Mesa. The RAP provides recommendations for the Balboa Avenue ROW including landscaping, street design, and walkways and crossings. The project is located within the western-most extent of the RAP Segment Four (Western Gateway- Clairemont Drive to I-5), and incorporates the Morena Boulevard ramps west of Moraga Avenue and connection of the sidewalk between Mission Bay Drive and Moraga Avenue.

5.1.2.4 Land Development Code

Chapters 11 through 15 of the City's Municipal Code are referred to as the LDC, as they contain the City's land development regulations that dictate how land is to be developed and used within the City. The LDC contains citywide base zones, and the planned district ordinances that specify permitted land use; development standards such as density, floor area ratio, and other requirements for given zoning classifications; overlay zones; and other supplemental regulations that provide additional development requirements. The existing zoning within the BASASP area

includes a mixture of Commercial (~~CC-4-2 and CV-1-2~~), Residential (~~RM-2-5, RM-4-10, RS-1-1, and RS-1-7~~), and Industrial, and Open Space zones (~~IL-3-1~~). (Refer to Figure 2-2.)

Development within the BASASP area is subject to the development regulations of the LDC, including the Coastal Overlay Zone, Coastal Height Limit Overlay Zone, and the Transit Area Overlay Zone within the LDC.

General Development Regulations

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within the Chapter 14, General Regulations. Also included within the general regulations of Chapter 14 are the Environmentally Sensitive Land (ESL) Regulations, discussed below.

Affordable Housing Density Bonus Regulations

The purpose of these regulations is to provide increased residential density to developers who guarantee that a portion of their residential development will be available to moderate income, low income, very low income, or other noted household types. The regulations are intended to materially assist the housing industry in providing adequate and affordable housing for all economic segments of the community and to provide a balance of housing opportunities throughout the City. These regulations implement the provisions of California Government Code Sections 65915 through 65918. It is intended that the affordable housing density bonus and any additional development incentive be available for use in all residential development of five or more units, using criteria and standards provided in the General Plan as part of this proposed CPU. All requests are required to be processed by the City of San Diego, and implemented by the San Diego Housing Commission.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (LDC Sections 143.0101 through 143.0160) is to protect, preserve and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The regulations are designed to ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats. The ESL Regulations contain development regulations that are applied through a Site Development Permit in accordance with Section 125.0502 of the LDC when there is a potential for impacts to environmentally sensitive resources. Within the BASASP area, ESL resources are limited to sensitive species and habitats and the Rose Creek floodplain.

Historical Resources Regulations

The purpose of the City's Historical Resources Regulations, found in Ch 14, Art. 3, Div. 2 Section 143.0251 of the LDC, is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important

archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. The Historic Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual (LDM), as a condition of approval. If development cannot comply with the development regulations for historical resources, then a Site Development Permit in accordance with Process Four is required. A more detailed description of the regulatory setting related to historical resources is provided in Section 5.7, *Historical and Tribal Cultural Resources*.

Coastal Overlay Zone

The western portion of the proposed BASASP area is located within the Coastal Overlay Zone (refer to Figure 5.3-2). The Coastal Overlay Zone (described within Chapter 13, Article 2, Division 4 of the LDC) addresses the protection of public access and coastal resources consistent with the Coastal Act. Development within the Coastal Overlay Zone is subject to the regulations of the LDC, as certified by the California Coastal Commission (CCC), and requires a CDP unless exempted by Section 126.070 of the LDC.

Coastal Height Limit Overlay Zone

The BASASP area west of I-5 is located within the Coastal Height Limit Overlay Zone. The Coastal Height Limit Overlay Zone (described within Chapter 13, Article 2, Division 5 of the LDC) provides a supplemental height limit of thirty feet above grade.

Transit Area Overlay Zone

Areas in close proximity to transit stops have reduced parking demand, and are allowed reduced off-street parking requirements, as compared to standard requirements. The BASASP area along Balboa Avenue between Mission Bay Drive and Morena Boulevard is within this overlay zone.

5.1.2.5 Multiple Species Conservation Program

The MSCP is a comprehensive program to preserve a network of habitat and open space in the region. In accordance with the MSCP, the City adopted a Subarea Plan in March 1997 to implement the MSCP and habitat preserve system within the City limits. One of the primary objectives of the MSCP is to identify and maintain a preserve system that allows for animals and plants to exist at both the local and regional levels. Large blocks of native habitat having the ability to support a diversity of plant and animal life are known as “core biological resource areas.” Linkages between these core areas provide for wildlife movement. The City’s MSCP Subarea Plan establishes a 52,727-acre area known as the Multi-Habitat Planning Area (MHPA) in which a permanent MSCP preserve will be assembled and managed. The southwest edge of the BASASP area is within, and adjacent to, the MHPA, as shown in Figure 5.3-2 in the Biological Resources section.

The City’s MSCP Subarea Plan additionally provides MHPA Land Use Adjacency Guidelines, which aim to avoid or reduce significant indirect impacts from adjacent uses. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development and are intended to be incorporated into the MMRP, and applicable permits

during the development review phase of future proposed projects. New development adjacent to the MHPA is required to address means of reducing these indirect impacts through implementation of the MHPA Land Use Adjacency Guidelines. A detailed discussion of these guidelines is included in Section 5.3.2.3 of this PEIR.

5.1.2.6 California Coastal Act

Chapter 3 of the California Coastal Act, also known as PRC Sections 30200-30265.5, governs coastal resources planning and management and protects public access and recreation within the Coastal Overlay Zone. The Coastal Act requires projects within the Coastal Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. The southern half of the BASASP area is within the Coastal Zone, which overlaps with the BASASP area south of Garnet Avenue from Rose Creek to just east of I-5 (Figure 5.3-2). The LCP is consistent with the Coastal Act in that coastal resources planning, and management, public access, and recreation are addressed.

Because the CCC has certified the LCP, the City has the authority to issue CDPs for projects within its jurisdiction that are consistent with the LCP. The LDC is the certified implementing ordinance for the development within the Coastal Overlay Zone. Development is currently reviewed against the regulations of the LDC and the certified LCP.

5.1.2.7 San Diego Association of Government's San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan), prepared and adopted by SANDAG in 2015, is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The Regional Plan supports healthy communities, a protected environment, a vibrant economy, and mobility choices for the region's residents over the next 35 years. It is a comprehensive roadmap that integrates the Regional Transportation Plan (RTP), the Sustainable Communities Strategy (SCS), and the Regional Comprehensive Plan (RCP) into one document to chart the region's future growth and transportation investments. Policy objectives include the following:

Habitat and Open Space Preservation

- Focus growth in areas that are already urbanized, allowing the region to set aside and restore more open space in our less developed areas.
- Protect and restore our region's urban canyons, coastlines, beaches, and water resources.

Regional Economic Prosperity

- Invest in transportation projects that provide access for all communities to a variety of jobs with competitive wages.
- Build infrastructure that makes the movement of freight in our community more efficient and environmentally friendly.

Environmental Stewardship

- Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.
- Support energy programs that promote sustainability.

Mobility Choices

- Provide safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play.
- Take advantage of new technologies to make the transportation system more efficient and accessible.

Partnerships/Collaboration

- Collaborate with Native American tribes, Mexico, military bases, neighboring counties, infrastructure providers, the private sector, and local communities to design a transportation system that connects to the megaregion and national network, works for everyone, and fosters a high quality of life for all.
- As we plan for our region, recognize the vital economic, environmental, cultural, and community linkages between the San Diego region and Baja California.

Healthy and Complete Communities

- Create great places for everyone to live, work, and play.
- Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.
- Increase the supply and variety of housing types -- affordable for people of all ages and income levels in areas with frequent transit service and with access to a variety of services.

5.1.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), as modified to reflect a programmatic analysis for the proposed BASASP, impacts related to land use would be significant if the proposed BASASP would:

1. Conflict with adopted community plans, land use designations, or any other applicable land use plans, policies, or regulations of state or federal agencies with jurisdiction over the City;
2. Conflict with adopted environmental plans, including the City's MSCP Subarea Plan; or
3. Physically divide an established community.

5.1.4 Issue 1: Consistency with Adopted Land Use Plans, Policies, and Regulations

Would the proposed BASASP conflict with adopted community plans, land use designations, or other applicable land use plans, policies, or regulations of state or federal agencies with jurisdiction over the City?

5.1.4.1 Impacts

City of San Diego General Plan Consistency

The proposed BASASP is intended to further express General Plan policies in the project area through the provision of site-specific recommendations that implement city-wide goals and policies, address community needs, and guide zoning. The BASASP is a comprehensive planning document that provides the policy framework to guide TOD and multi-modal improvements in the vicinity of the Balboa Avenue Station and within the BASASP area. The proposed BASASP contains six major chapters, each providing goals and policies related to the creation of a transit-oriented community village, consistent with the City of Villages strategy outlined in the General Plan (see Chapter 3.0 for details on the contents of the chapters). The goals and policies established in the proposed BASASP are consistent with design, other mobility, and civic guidelines, stated in the policies of the General Plan (see Tables 5.1-2 through 5.1-12).

The Land Use chapter of the BASASP is proposed to (1) establish the distribution and pattern of land uses throughout the community, and (2) outline area-specific policies to guide future development and redevelopment. The land use policies in the BASASP are focused on encouraging development and redevelopment within the Pacific Beach portion of the BASASP area; properties located within the Clairemont Mesa area are not subject to the BASASP policies and supplemental development regulations. Land uses within the Clairemont Mesa portion of the BASASP area would not change. As with the Land Use and Community Planning Element of the General Plan, the proposed BASASP places an emphasis on directing growth into a mixed-use community village that is pedestrian-friendly and linked through multi-modal improvements to the regional transit system.

The proposed BASASP incorporates the City of Villages strategy by designating a mixed-use TOD village within the eastern portion of the Pacific Beach community within walking and biking distance of the future Balboa Avenue Station. Implementation of the land uses outlined in the proposed BASASP would create a mixed-use village which would implement the City's General Plan City of Villages strategy by combining land use types and intensities in a manner that takes advantage of existing and enhanced access to regional transit. The proposed BASASP would establish a village in a suitable location as indicated on the Village Propensity Map. To create a village near the Balboa Avenue Station, the proposed BASASP contains policies that encourage mixed-use development with ground-floor frontages that are activated with commercial uses; promote a balance of housing, jobs, shopping, and employment with access to walking, biking, or transit opportunities; and take advantage of the maximum allowed residential densities to provide affordable, senior, and workforce housing. Thus, the proposed BASASP would be consistent with, and would implement, the goals and policies of the Land Use Element of the General Plan, and would apply the City of Villages strategy to the setting and needs of the BASASP area.

The overall goal of the General Plan Mobility Element is to “further the attainment of a balanced, multi-modal transportation network that gets us where we want to go and minimizes environmental and neighborhood impacts.” A balanced network is defined by the Element as one in which each mode, or type of transportation, is able to contribute to an efficient network of services meeting varied user needs. The proposed BASASP implements the goals of the General Plan Mobility Element by proposing area-specific policies relating to making multi-modal enhancements within and through the BASASP area. Consistent with the General Plan Mobility Element, the proposed BASASP includes policies that would promote the establishment of a complete streets network that would capitalize on access to transit; provide a walkable and pedestrian environment; and encourage traffic calming, bicycle facilities, and parking improvements. Specific mobility improvements are recommended along local roads within the BASASP area to establish new pedestrian, bicycle, and multi-use connections where none currently exist, with a particular focus on improving non-motorized access from Pacific Beach to the Balboa Avenue Station. The proposed BASASP is therefore consistent with the Mobility Element of the General Plan.

The General Plan Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages. The Urban Design chapter of the proposed BASASP supports and implements the General Plan by including specific design guidelines and policies for the BASASP area that are consistent with the community’s existing character, while providing the design framework to create a new and consistent development character (as described in Section 5.16, *Visual Effects and Neighborhood Character*). The Urban Design chapter of the proposed BASASP implements the Urban Design Element of the General Plan in that it establishes direction for village design, community gateways and linkages, streetscapes and pedestrian orientation, and other unique Pacific Beach attributes.

The policies of the General Plan Economic Prosperity Element are intended to improve economic prosperity by ensuring that the economy grows in ways that strengthens industries, retains, and creates good jobs with self-sufficient wages, increases average income, and stimulates economic investment in our communities. Consistent with the goals of the General Plan, the proposed BASASP would promote economic prosperity within the BASASP area by retaining lands for industrial uses, enhancing commercial and office development opportunities in the vicinity of the freeway and transit, and creating more jobs and housing for the local and regional economy. The goals and policies of the proposed BASASP are consistent with, and further implement, those of the General Plan relative to economic development.

The General Plan Recreation Element provides citywide guidance for the preservation, protection, acquisition, development, operation, maintenance, and enhancement of public recreation opportunities and facilities throughout the City for all users. The BASASP Recreation chapter includes policies for future park and recreation facilities within the BASASP area that would increase the amount of park and recreation land in the community. The proposed BASASP identifies a potential recreation site north of Damon Avenue and east of Mission Bay Drive to be used as a pocket park or plaza space and a bike repair station adjacent to the Rose Creek Trail. The proposed BASASP also identifies multi-modal connectivity enhancements that would improve access to Mission Bay Park, in particular the De Anza Cove area. Therefore, the proposed BASASP is consistent with the recreation policies of the General Plan.

The BASASP Conservation chapter builds on the General Plan Conservation Element by proposing policies which pertain to conservation goals in the General Plan. Those conservation policies include implementing pedestrian and bicycle infrastructure improvements in a transit priority area (TPA) to increase commuter walking and bicycling opportunities; supporting higher density/intensity housing and employment development to increase transit ridership; and incorporating low impact development (LID) practices into building design and site plans to protect water quality. Therefore, the proposed BASASP is consistent with the conservation policies of the General Plan.

With respect to the General Plan policies concerning noise and land use compatibility, the proposed BASASP is located in an area surrounded by urban uses, railroad and transit ROW, and major roadways and freeways. Future development within the BASASP would be required to incorporate noise attenuation measures for new uses that would protect people living and working in the community from an excessive noise environment (pursuant to mitigation measure NOI-1 identified in Section 5.10, *Noise*). Therefore, the proposed BASASP is consistent with the land use and noise compatibility policies of the General Plan.

The General Plan Historic Preservation Element is intended to preserve, protect, restore, and rehabilitate historical and cultural resources throughout the City. Implementation of the proposed BASASP would not result in impacts to historic resources that are potentially significant. Nonetheless, as projects move forward under the plan they would be required to comply with the Historic Resources Regulations in the LDC (pursuant to mitigation measures HIST-1 and HIST-2 identified in Section 5.7, *Historical Resources*). The proposed BASASP is therefore consistent with the General Plan, relative to historic resources policies.

In summary, the proposed BASASP contains six plan chapters, each providing community-specific goals and recommendations, along with an implementation element. Overall, the proposed BASASP incorporates goals and policies intended to support the General Plan policies. Therefore, land use impacts related to policy consistency with the General Plan would be less than significant.

Climate Action Plan Consistency

The BASASP is proposed to help implement the goals and objectives of the CAP by increasing employment and housing opportunities near transit, promoting walking and bicycle use as viable travel choices, and improving transit access. In addition to encouraging higher development intensities within TPAs and in proximity to Balboa Avenue Station, the proposed BASASP contains specific recommendations for multi-modal improvements that would facilitate access to transit and reduce resident and visitor reliance on single-occupancy vehicles. Land use impacts related to policy consistency with the CAP would be less than significant.

Adopted Community Plans Consistency

Pacific Beach Community Plan/LCP

A CPA is proposed concurrent with the proposed BASASP to amend the Pacific Beach Community Plan/LCP to incorporate the BASASP land uses, as reflected in Figure 3-1. The Light Industrial-designated areas within the Pacific Beach Community along Damon Avenue and Albuquerque Street would not be modified by the CPA.

The proposed BASASP contains a number of policies, and identifies multi-modal improvements that would directly implement many of the concepts put forth in the Pacific Beach Community Plan. For example, the Circulation Element of the Community Plan puts an emphasis on taking advantage of transit services and expanding pedestrian and bicycle infrastructure to reduce congestion within the community; the BASASP Mobility chapter recommends transit, streetscape, pedestrian, and bicycle facilities along Garnet and Balboa Avenues that would facilitate connections to the Balboa Avenue Station consistent with the intent of these goals in the Community Plan. In addition, the Mobility and Urban Design chapters of the proposed BASASP recommend the incorporation of bike parking/corrals and other facilities into new development and along streets, as suggested in the circulation proposals in the Community Plan. The creation of a village with a mix of land uses that are co-located and integrated with a network of pedestrian and bicycle friendly links to the Balboa Avenue Station mirrors the commercial land use goals outlined in the Community Plan, wherein mixed-use development is placed along transit corridors and in core commercial areas. Specifically, the Community Plan recommends a specific proposal to apply commercial zoning to properties along Mission Bay Drive to provide for a mix of larger scale retail, wholesale, commercial service, hotel, and business/professional office uses; pedestrian-oriented retail, hotel, office, commercial and residential uses would be permitted in the Community Village land use designation and zoning proposed in the BASASP area.

Furthermore, the Residential Element of the Community Plan encourages development of residential units within transit corridors, including the recognition that TOD in community commercial areas should emphasize pedestrian-oriented design features and smaller (affordable) units, consistent with the Land Use chapter of the proposed BASASP. Proposed residential densities would range up to 73 du/ac (CC-3-8 zone) and up to 109 du/acre (CC-3-9 and RM-4-10 zones) within the Community Village land use designation (refer to Figures 3-1 and 3-2), which would be greater than those anticipated in the Commercial Element of the Community Plan (i.e., up to 43 du/ac). However, design standards in the Urban Design chapter of the BASASP would ensure that a comprehensively designed and vibrant transit-oriented village would be created, as envisioned in the Community Plan.

Although the Pacific Beach Community Plan suggests that residential uses could be integrated with industrial land uses near Damon Avenue, the BASASP does not propose any changes to the land use designation or zoning in that portion of the BASASP area. Instead the concept of creating a mixed-use village is focused in the commercial and residentially designated portions of the BASASP area.

The Recreation chapter of the proposed BASASP also incorporates the concept of a linear park for the Rose Creek open space, as envisioned in the Parks and Open Space Element of the Pacific Beach Community Plan.

Therefore, the proposal to modify land uses and create a policy framework to guide TOD and multi-modal improvements would be consistent with the policies in the Pacific Beach Community Plan/LCP and less than significant impacts are identified.

Clairemont Mesa Community Plan

No changes to the land use designations or zoning within the Clairemont Mesa Community Plan area are proposed as part of the BASASP. None of the TOD recommendations and multi-modal

improvements outlined in the proposed BASASP would affect facilities within the Clairemont Mesa Community Plan. The project would not modify any of the industrial land uses or zoning in this portion of the BASASP area. Therefore, the proposed BASASP would be consistent with the land use policies in the Clairemont Mesa Community Plan.

Balboa Avenue Revitalization Action Program Consistency

The Balboa Avenue RAP provides recommendations for Balboa Avenue within the Clairemont Mesa community, including landscaping, street design, walkways, and crossings. The proposed efforts to expand connectivity along Garnet Avenue/Balboa Avenue west of I-5 proposed in the BASASP would complement and be consistent with the efforts to improve the streetscape proposed by the RAP.

Land Development Code Regulations Consistency

Concurrent with the adoption of the proposed BASASP and amendment of the Pacific Beach Community Plan/LCP, the zoning for a portion of the BASASP area is proposed to be changed from Residential (RM-2-5), Commercial (CC-4-2 and CV-1-2), and Industrial (IL-3-1) to Residential (RM 3-8 and RM-4-10), Commercial (CC-3-8 and CC-3-9), and Open Space (OF-1-1) to reflect the land use designations identified in the BASASP (Figure 3-2). Table 5.1-13, *Existing and Proposed Zone Classifications*, compares the zone classifications proposed by the BASASP with those that currently exist in the Specific Plan area. Refer to Figures 2-1 and 3-2 for illustrations of existing and proposed zone classifications.

**Table 5.1-13
EXISTING AND PROPOSED ZONE CLASSIFICATIONS**

Existing Zone Classification	Proposed Zone Classifications
Residential RM 2-5	Residential RM-3-8
Residential RM 4-10	Residential RM-4-10
<u>Residential RS-1-1</u>	<u>Open Space OF-1-1</u>
<u>Residential RS-1-7</u>	<u>Open Space OF-1-1</u>
Commercial CC-4-2	Commercial CC-3-8 Commercial CC-3-9 Residential RM-4-10
<u>Commercial CC-4-5</u>	<u>Commercial CC-4-5</u>
<u>Commercial/Office CO-1-2</u>	<u>Commercial/Office CO-1-2</u>
Commercial CV-1-2	Commercial CC-3-8 Commercial CC-3-9
Industrial IL-3-1	Open Space OF-1-1
<u>Industrial IP-2-1</u>	<u>Industrial IP-2-1</u>
<u>Industrial IS-1-1</u>	<u>Industrial IS-1-1</u>

1. Existing industrial-zoned land in Pacific Beach Community would remain, except for where it overlaps with Rose Creek open space.
2. None of the land in the Clairemont Mesa Community would be rezoned.

The use and development regulations of the LDC would apply to property within the BASASP area, except where supplemental development regulations are proposed for lands designated Community Village (Figure 3-1) which would allow for:

- ~~Removal of the ground-floor minimum height requirement for properties in the Community Village designation in the Community Commercial (CC-3-8 and CC-3-9) zone;~~
- ~~Removal of restrictions on residential uses on the ground floor of residential development properties designated in the Community Village designation in the Community Commercial zones of the Coastal Overlay Zone where active commercial frontages are not required as shown on Figure 3-1;~~ and
- Requirement for ~~non-contiguous sidewalks~~ a multi-use path and street trees where development is proposed in the Community Village designation along active commercial frontages of Garnet Avenue and Mission Bay Drive.

The supplemental development regulations are proposed to facilitate the intensification of uses in accordance with the proposed community village uses and enhance the public realm along its adjacent streets to encourage pedestrian-friendly development and enhanced walkability.

General Development Regulations

Future development implemented under the proposed BASASP would be required to comply with ~~(or request deviations from)~~ applicable development regulations of the underlying zone classification, and review would occur on a project-by-project basis, thereby ensuring consistency with general development regulations.

Environmentally Sensitive Lands Regulations

No direct encroachment into resources within Rose Creek that are protected by the ESL is anticipated. The only potential improvements identified under the proposed BASASP in the vicinity of the creek are signage, accessible paths, public art, sitting areas, outdoor dining areas, and/or public spaces that take advantage of its open space views. Future development along the Rose Creek corridor would be required to adhere to and be consistent with ESL Regulations. Thus, no impacts related to policy conflicts are identified.

Historical Resources Regulations

As discussed in Section 5.7 of this PEIR, historical resources are known to occur within the BASASP area including historic structures and properties, as well as archaeological resources. Impacts from future development on historical resources in the BASASP area would occur at the project level. Due to the presence of historical resources, future development within the BASASP area would be required to comply with the City's Historical Resources Regulations that require any historical ~~recorded~~ resources to be evaluated for significance/importance in accordance with criteria listed in the Historical Resources Guidelines. Resources determined to be significant/important must either be avoided or a data recovery program for important archaeological sites must be developed and approved. In addition to protection afforded by the City regulations and General Plan policies, policies are proposed in the BASASP to address the identification and preservation of historical, archaeological, and tribal cultural resources within the project area to reinforce these requirements. Adherence to the regulations and BASASP policies would ensure consistency with historical resources regulations.

California Coastal Act Consistency

As discussed previously, the southwestern portion of the BASASP area is located within the Coastal Zone, including all areas south of Garnet Avenue and west of the railroad ROW and overlaps with Rose Creek. Coastal salt marsh is the only native vegetation community within the BASASP area occurring within the Coastal Zone.

The California Coastal Act requires projects within the Coastal Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. The proposed BASASP requires approval of a CPA as well as certification by the CCC for the amendment. In order for the CCC to certify the LCP amendment, the CCC must determine that the changes to the LCP are consistent with the policies contained in Chapter 3 of the California Coastal Act. To assist the CCC in its determination, an evaluation of the proposed BASASP with these policies is contained in Table 5.1-14, *California Coastal Act Consistency*. As demonstrated in the table, the LCP would be consistent with the California Coastal Act, and no associated land use policy consistency impacts would occur.

Table 5.1-14
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 2 Public Access			
30210	Maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.	Existing public access from roadways within the BASASP area to coastal resources, including pathways within and adjacent to the Mission Bay Park, would be maintained and enhanced. Recommended multi-modal improvements, including a shared pedestrian/bicycle facility along Mission Bay Drive, south of Rosewood Street, are identified in the proposed BASASP that would provide enhanced access to coastal resources in the area, in particular Rose Creek open space and De Anza Cove/Mission Bay Park.	Consistent
30211	Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from Mission Bay, and therefore no direct access to the coast is provided. However, as discussed above, recommended multi-modal improvements identified in the proposed BASASP would provide enhanced access to coastal resources, namely Rose Creek open space and De Anza Cove in Mission Bay Park.	Consistent
30212	(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or, (3) agriculture would be adversely affected. Dedicated access way shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the access way.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from Mission Bay, and therefore no direct access to the coast is available and off-site access would be unaffected by the project.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 2 Public Access (cont.)			
30212.5	Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.	Existing public facilities within the portion of the BASASP area in the Coastal Zone include street parking or development-specific parking, which would comply with the City's standard parking requirements. The exception would be the portion of the BASASP area within the Transit Area Overlay Zone which would have reduced parking demand and is over ½ mile from any coastal resources. No potential for overcrowding or overuse of any one of these public facilities would occur.	Consistent
30213	Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.	The Recreation chapter of the proposed BASASP includes specific policies and recommendations addressing the incorporation off park amenities as part of private or public developments and enhancements to Rose Creek open space, including its preservation and accessibility. Establishment of new pedestrian/bicycle facilities would also provide recreation opportunities to the public. Along with the broader goals and policies of the General Plan, the proposed BASASP would ensure that recreational facilities would be protected and encouraged.	Consistent
Article 3 Recreation			
30220	Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast, and does not include any water-oriented recreational activities.	Not Applicable
30221	Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast, and therefore, does not contain any oceanfront land that is suitable for recreation use. However, the Rose Creek bike path and other recommended multi-modal facilities would provide access to oceanfront recreation in Mission Bay Park.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 3 Recreation (cont.)			
30222	The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.	The portion of the BASASP area within the Coastal Zone does not contain any land designated for visitor-serving commercial recreational uses.	Not Applicable
3022.5	Oceanfront land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast, and therefore, does not contain any oceanfront land.	Not Applicable
30223	Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.	There are no upland areas suitable for coastal recreation uses in the BASASP area. However, the Rose Creek bike path and other recommended multi-modal facilities would enable access to coastal recreation in Mission Bay Park.	Consistent
30224	Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast, and does not contain any coastal waters suitable for boating.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 4 Marine Environment			
30230	Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.	Although the portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast, marine resources within Rose Creek would be maintained in open space, in accordance with the proposed BASASP.	Not Applicable
30231	The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.	Sources of pollution from the BASASP area that ultimately discharge into Mission Bay are expected to decrease due to new storm water regulations that require implementation of storm water BMPs to reduce storm water pollution and incorporation of LID practices as part of new development and redevelopment. Implementation of such improvements would not only reduce pollution by reducing runoff volume, but also can provide treatment by filtration and microbial action. Additionally, the Conservation chapter of the proposed BASASP contains policies aimed to manage and treat urban runoff. Implementation of these policies as well as compliance with storm water regulations will ultimately contribute to the improvement of the quality of the coastal marine habitat within Rose Creek and Mission Bay.	Consistent

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 4 Marine Environment (cont.)			
30232	Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.	No industrial uses are designated within the portion of the BASASP area in the Coastal Zone, and therefore, hazardous substances are not expected to be used or transported in quantities that would adversely affect coastal resources. Such substances may be used during construction of individual projects implemented under the proposed BASASP, but they would be regulated and effectively controlled by implementation of National Pollutant Discharge Elimination System (NPDES) and storm water requirements.	Consistent
30233	The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects.	None of the recommended improvements would cause impacts to open waters or wetlands within Rose Creek, including the portion of the BASASP area in the Coastal Zone.	Consistent
30234	Facilities serving the commercial fishing and recreational boating industries shall be protected and, where feasible, upgraded. Existing commercial fishing and recreational boating harbor space shall not be reduced unless the demand for those facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, where feasible, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast and does not contain any coastal waters suitable for boating or commercial fishing facilities.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 4 Marine Environment (cont.)			
30234.5	The economic, commercial, and recreational importance of fishing activities shall be recognized and protected.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast and does not contain any fishing facilities.	Not Applicable
30235	Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fish kills should be phased out or upgraded where feasible.	The portion of the BASASP area within the Coastal Zone is located approximately 0.25 mile from the coast and does not contain any shoreline or oceanfront land with marine structures.	Not Applicable
30236	Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.	Future development or improvements under the proposed BASASP would not directly impact Rose Creek, including the portion of Rose Creek in the Coastal Zone.	Consistent

**Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY**

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 5 Land Resources			
30240	<p>(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.</p> <p>(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.</p>	Future development and public improvements implemented under the proposed BASASP would not directly impact sensitive habitat within the Coastal Zone, in particular Rose Creek. Indirect impacts to resources within the creek and its open space could occur; however, compliance with biology mitigation and the City's Land Use Adjacency Guidelines would prevent potentially significant impacts from occurring.	Consistent
30241	The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the area's agricultural economy, and conflicts shall be minimized between agricultural and urban land uses.	There are no agricultural lands within the BASASP area, including the portion in the Coastal Zone.	Not Applicable
30241.5	If the viability of existing agricultural uses is an issue pursuant to subdivision (b) of Section 30241 as to any local coastal program or amendment to any certified local coastal program submitted for review and approval under this division, the determination of "viability" shall include, but not be limited to, consideration of an economic feasibility evaluation.	There are no agricultural lands within the BASASP area, including the portion in the Coastal Zone.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 5 Land Resources (cont.)			
30242	All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.	There are no agricultural lands within the BASASP area, including the portion in the Coastal Zone.	Not Applicable
30243	The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.	There are no timber lands within the BASASP area, including the portion in the Coastal Zone.	Not Applicable
30244	Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.	Goals, policies, guidelines, and recommendations enacted by the City, combined with the federal, state, and local regulations described in Sections 5.7 (<i>Historical and Tribal Cultural Resources</i>) and 5.11 (<i>Paleontological Resources</i>) of the PEIR, provide a regulatory framework for developing project-level mitigation. All development projects with the potential to affect historic structures and prehistoric and paleontological resources would be subject to site-specific review in accordance with Regulations and Guidelines through the discretionary process, in accordance with policies in the proposed BASASP.	Consistent

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 6 Development			
30250	<p>(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.</p> <p>(b) Where feasible, new hazardous industrial development shall be located away from existing developed areas.</p> <p>(c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.</p>	<p>The BASASP area is almost entirely built out, and undeveloped land associated with Rose Creek within the Coastal Zone is designated as open space. Because the area is located in a previously developed area, it is served by existing public services (as discussed in Sections 5.13, <i>Public Services</i>, and 5.14, <i>Public Utilities</i>, of this PEIR).</p> <p>No industrial uses or visitor-serving facilities are designated within the portion of the BASASP area in the Coastal Zone.</p>	Consistent
30251	The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the	Section 5.16, <i>Visual Effects and Neighborhood Character</i> , of this PEIR describes the scenic and visual resources and potential effects of BASASP implementation. Rose Creek is the primary open space area with scenic natural elements within the BASASP area. Only peripheral views of Mission Bay are afforded from public roads, I-5, and the rail line	Consistent

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 6 Development (cont.)			
30251 (cont.)	character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas, such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government, shall be subordinate to the character of its setting.	through the BASASP area. Future development within the Coastal Zone portion of the BASASP area would not result in impacts to scenic coastal areas or views of coastal resources because limited views exist, views from coastal recreation activities are focused toward the water and away from the project area, and development would comply with the Coastal Zone height limit of 30 feet. No significant landform alteration would be expected due to relatively level terrain. While the proposed BASASP would intensify uses within the Coastal Zone, such intensification would be focused in developed areas within the proposed urban village and not significantly affect the coastal setting.	
30252	The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) ensuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of on-site recreational facilities to serve the new development.	The BASASP is proposed near one of the largest aquatic parks in the State with a multitude of recreational options and 27 miles of coastline. The proposed BASASP contains policies and specific multi-modal improvements, such as sidewalks, bicycle lanes/paths, and street enhancements that would provide enhanced access to coastal resources in Mission Bay and along Rose Creek. Future development and redevelopment would be focused near public transit opportunities and not near the coast. The Recreation chapter of the proposed BASASP includes policies for future public facilities within the area that would increase the amount of park and recreation opportunities in the community. Therefore, the recreation needs of future residents of the BASASP area would be served by existing and proposed facilities.	Consistent

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 6 Land Resources (cont.)			
30253	<p>New development shall do all of the following:</p> <p>(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.</p> <p>(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</p> <p>(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.</p> <p>(d) Minimize energy consumption and vehicle miles traveled.</p> <p>(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.</p>	<p>Geologic and seismic issues are described in Section 5.5, <i>Geology and Soils</i>, of this PEIR. Implementation of the LDC and compliance with the California Building Code (CBC) would ensure that potential development is not adversely impacted by unstable soils. In addition, future structures would be built in conformance to applicable building and fire codes to minimize damage from seismic events or fire. Flood hazards are discussed in Section 5.9, <i>Hydrology, Water Quality, and Drainage</i>, of this PEIR.</p> <p>Adherence to the LDC grading regulations and construction requirements and implementation of recommendations and standards would reduce and avoid impacts related to soil erosion.</p> <p>Air quality issues are described in Section 5.2, <i>Air Quality</i>, of this PEIR and development would comply with applicable requirements imposed on the project with regard to pollutant emissions.</p> <p>Implementation of the proposed land uses would not increase the demand for energy beyond the City's available supply. The proposed BASASP would also create pedestrian facilities throughout the community as well as provide a safe bicycle network and encourage public transit use.</p> <p>The proposed BASASP contains several goals and policies that would protect existing popular destination points. The proposed BASASP would also provide a comprehensive strategy intended to accommodate the recreation needs of residents in the community.</p>	Consistent

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 6 Development (cont.)			
30254	New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division, provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services, and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.	No public works facilities are recommended or identified within the portion of the BASASP area in the Coastal Zone.	Not Applicable
30255	Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.	No coastal-dependent uses are recommended or identified within the portion of the BASASP area in the Coastal Zone. Additionally, no shoreline areas occur within the BASASP area.	Not Applicable

Table 5.1-14 (cont.)
CALIFORNIA COASTAL ACT CONSISTENCY

Public Resources Code Section	Analysis	Consistency Analysis	Consistency Determination
Article 7 Industrial Development			
30260	Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.	No industrial uses are within or designated for the portion of the BASASP area in the Coastal Zone.	Not Applicable

SANDAG's San Diego Forward: The Regional Plan Consistency

The proposed BASASP would be consistent with the goals of the Regional Plan to focus growth in areas that are already urbanized, and connect communities with transit. The BASASP proposes to establish a transit-oriented, urban, and mixed-use community village that would reduce reliance on the automobile, and promote walking and use of alternative transportation. The proposed BASASP supports the policy objectives of the Regional Plan through the designation of a TOD village in a TPA, as well as in the vicinity of a future trolley station (i.e., Balboa Avenue Station). Policies contained within the proposed Land Use and Mobility chapters serve to promote walking, bicycling, and other street improvements that would reinforce and expand access within and through the BASASP area. These project features would be consistent with the Regional Plan's policy objectives.

5.1.4.2 Significance of Impacts

Potential land use plan consistency impacts would be less than significant because the goals, policies, and programs of the proposed BASASP would be consistent with existing applicable local and regional land use plans, policies, and regulations as discussed above.

5.1.4.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.1.4.4 Significance After Mitigation

Impacts would be less than significant.

5.1.5 Issue 2: Environmental Planning Consistency

Would the proposed BASASP conflict with adopted environmental plans, including the City's MSCP Subarea Plan?

5.1.5.1 Impacts

The presence of undeveloped land in the BASASP area that may support sensitive plant and wildlife species both within and outside the MHPA means the City's MSCP Subarea Plan and Implementing Agreement are applicable to development within the BASASP area.

The MSCP Subarea Plan identifies MHPA along the northwestern edge of the BASASP area, primarily within the Rose Creek channel (see Figure 5.3-1). The MHPA in the southwestern portion of the BASASP area includes coastal salt marsh, southern willow scrub, disturbed habitat, and developed land. No impacts would occur to the coastal salt marsh or southern willow scrub as they are located within the Rose Creek channel, which would not be directly impacted by implementation of the proposed BASASP because this area would be designated as flood control/open space.

The MHPA also encompasses developed land north of Garnet Avenue, where development is expected to occur within the BASASP area. While MHPA lands are considered by the City to be a sensitive biological resource, limited development is allowed in the MHPA subject to the

requirements of the City's MSCP Subarea Plan (i.e., typically up to 25 percent of a property wholly in the MHPA can be developed and some uses are considered compatible, to be developed or remain so, within the MHPA). In cases where previously developed land has been included within the MHPA, the Boundary Line Correction process can be used to remove developed or disturbed land, as described in Section 5.3, *Biological Resources*.

The MHPA is surrounded by land designated for residential, commercial, and industrial uses. Future development that would be adjacent to the MHPA would be subject to the MHPA Land Use Adjacency Guidelines, which aim to avoid or reduce significant indirect impacts from adjacent uses. These guidelines, as contained in Section 1.4.3 of the MSCP Subarea Plan, address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development. Adherence to these guidelines via mitigation identified in Section 5.3 of this PEIR would avoid environmental plan consistency impacts associated with the MSCP Subarea Plan.

5.1.5.2 Significance of Impacts

Potential environmental plan consistency impacts would be less than significant because planned improvements and future development that could occur under the proposed BASASP would not encroach into sensitive resources in the Rose Creek MHPA and the portion of the MHPA where development could occur does not contain sensitive resources. A Boundary Line Correction could be processed in the future, as permitted under the City Biology Guidelines and MSCP, to remove previously developed lands from the MHPA and avoid land use policy impacts. Future development adjacent to the MHPA would be required to comply with the MSCP Land Use Adjacency Guidelines as part of the Mitigation Framework in the PEIR (see BIO-8 in Section 5.3). Less than significant impacts are identified.

5.1.5.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.1.5.4 Significance After Mitigation

Impacts would be less than significant.

5.1.6 Issue 3: Community Division

Would the proposed BASASP physically divide an established community?

5.1.6.1 Impacts

The BASASP area is currently comprised of a mix of residential, commercial, industrial, and open space uses that are physically divided by a major transportation corridor containing I-5 and the LOSSAN rail line and soon to be operating Mid-Coast Trolley Line. Major local streets traverse the western portion of the BASASP area, while Morena Boulevard runs along the eastern boundary. These transportation facilities bar social, visual, and physical connections, all of which contribute to a divided community. The local streets contribute to these divisions within the community because of the consistent volume of traffic that uses them on a daily basis, as described in Section 5.15,

Transportation/Circulation, of the PEIR. While these existing transportation corridors will remain and continue to divide the community, no new or widened roads are planned as part of the proposed BASASP and the proposed multi-modal improvements would create new connections and enhance existing connections between the various uses present in the project area that could be accessed without relying on cars. The proposed BASASP would, in turn, reduce the amount of division that exists in the project area, by improving walkability and bicycle opportunities within the Pacific Beach community and near the Balboa Avenue Station and its related transit improvements.

The siting of mixed uses in proximity to each other, the provision of enhanced pedestrian corridors and bicycle amenities, and the planned changes to the street network would serve to foster community connectivity, which is consistent with policies in the Mobility Element of the General Plan. This village land use strategy would also enhance public gathering places and destinations to foster improved community connectivity and cohesion. Overall, incorporation of the goals and recommendations in the proposed BASASP would enhance community connectivity and would not physically divide an established community. Potential impacts to community cohesiveness would therefore be less than significant.

5.1.6.2 Significance of Impacts

The proposed BASASP would not physically divide an established community, and associated land use impacts would be less than significant. Community connectivity would be enhanced by provisions in the proposed BASASP that establish an urban village and improved pedestrian, bicycle, and transit-oriented amenities.

5.1.6.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.1.6.4 Significance After Mitigation

Impacts would be less than significant.

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5.2 AIR QUALITY

This section is based on the information and analysis presented in the Air Quality Technical Report for the proposed project, dated March 2018 (HELIX 2018a). The technical report is included in its entirety as Appendix B.

5.2.1 Existing Conditions

5.2.1.1 Climate and Meteorology

The climate in southern California, including the San Diego Air Basin (SDAB) in which the BASASP area is located, is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. Areas within 30 miles of the coast experience moderate temperatures and comfortable humidity. Precipitation is limited to a few storms during the winter season. The climate of San Diego County is characterized by hot, dry summers, and mild, wet winters.

The predominant wind direction in the vicinity of the BASASP area is from the west-northwest and the average wind speed is approximately five miles per hour (Iowa Environmental Mesonet 2017). The annual average maximum temperature in the BASASP area is approximately 67 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56°F. Total precipitation in the BASASP area averages approximately 10 inches annually. Precipitation occurs mostly during the winter and is relatively infrequent during the summer (Western Regional Climate Center [WRCC] 2016).

Due to its climate, the SDAB experiences frequent temperature inversions (temperature increases as altitude increases, which is the opposite of general patterns). Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and nitrogen dioxide (NO₂) react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO₂ emissions. High NO₂ levels usually occur during autumn or winter, on days with summer-like conditions.

5.2.1.2 Air Pollutants of Concern

Criteria Air Pollutants

Federal and state laws regulate air pollutants emitted into the ambient air by stationary and mobile sources. These regulated air pollutants are known as “criteria air pollutants,” and are categorized by primary and secondary standards. Primary standards are a set of limits based on human health effects. Secondary standards are another set of limits intended to prevent environmental and property damage. Criteria air pollutants are defined by state and federal law as a risk to the health and welfare of the general public.

The following specific descriptions of health effects for each air pollutant are based on information from the USEPA (2017a) and the California Air Resources Board (CARB; 2009).

Ozone. Ozone (O_3) is considered a photochemical oxidant, which is a chemical that is formed when volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), both byproducts of fuel combustion, react in the presence of ultraviolet light. O_3 is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk to O_3 exposure.

Carbon Monoxide. Carbon monoxide (CO) is a product of fuel combustion, and the main source of CO in the SDAB is from motor vehicle exhaust. CO is an odorless, colorless gas. CO affects red blood cells in the body by binding to hemoglobin and reducing the amount of oxygen that can be carried to the body's organs and tissues. CO can cause health effects to those with cardiovascular disease and can also affect mental alertness and vision.

Nitrogen Dioxide. Nitrogen dioxide (NO_2) is also a by-product of fuel combustion and is formed both directly as a product of combustion and in the atmosphere through the reaction of nitric oxide (NO) with oxygen. NO_2 is a respiratory irritant and may affect those with existing respiratory illness, including asthma. NO_2 can also increase the risk of respiratory illness.

Respirable Particulate Matter and Fine Particulate Matter. Respirable particulate matter (PM_{10}) refers to particulate matter with an aerodynamic diameter of 10 microns or less. Fine particulate matter ($PM_{2.5}$), refers to particulate matter with an aerodynamic diameter of 2.5 microns or less. Particulate matter in these size ranges has been determined to have the potential to lodge in the lungs and contribute to respiratory problems. PM_{10} and $PM_{2.5}$ arise from a variety of sources, including road dust, diesel exhaust, fuel combustion, construction operations, and windblown dust. PM_{10} and $PM_{2.5}$ can increase susceptibility to respiratory infections and can aggravate existing respiratory diseases such as asthma and chronic bronchitis. $PM_{2.5}$ is considered to have the potential to lodge deeper in the lungs.

Sulfur dioxide. Sulfur dioxide (SO_2) is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil, and by other industrial processes. Generally, the highest concentrations of SO_2 are found near large industrial sources. SO_2 is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO_2 can cause respiratory illness and aggravate existing cardiovascular disease.

Lead. Lead (Pb) in the atmosphere occurs as particulate matter. Pb has historically been emitted from vehicles combusting leaded gasoline, as well as from industrial sources. With the phase-out of leaded gasoline, large manufacturing facilities have become the primary sources of lead emissions. Pb has the potential to cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Pb is also classified as a probable human carcinogen.

Sulfates. Sulfates (SO_4) are the fully oxidized ionic form of sulfur. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to SO_4 compounds in the atmosphere. The conversion of SO_2 to SO_4 takes place comparatively rapidly and completely in urban areas of California due to regional

meteorological features. The CARB's SO₄ standard is designed to prevent aggravation of respiratory symptoms. Effects of SO₄ exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. SO₄ is particularly effective in degrading visibility, and due to fact that it is usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide. Hydrogen sulfide (H₂S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. It can be present in sewer gas and some natural gas, and it can also be emitted as the result of geothermal energy exploitation. Breathing H₂S at levels above the standard would result in exposure to a very disagreeable odor. In 1984, a CARB committee concluded that the ambient standard for H₂S is adequate to protect public health and to significantly reduce odor annoyance.

Vinyl Chloride. Vinyl chloride, a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in the air can cause central nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure to vinyl chloride through inhalation and oral exposure can cause liver damage.

Visibility-Reducing Particles. Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. These particles in the atmosphere can obstruct the range of visibility. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze.

Toxic Air Contaminants

The Health and Safety Code (Section 39655 (a)) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the Federal Clean Air Act (CAA) (42 United States Code Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different than the criteria air pollutants previously discussed because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

5.2.1.3 Background Air Quality

The San Diego Air Pollution Control District (SDAPCD) operates a network of ambient air monitoring stations throughout the County. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether the ambient air quality meets the state and national ambient air quality standards. Monitoring data at the Kearny Villa Road monitoring station showed acceptable levels of NO₂, PM₁₀, and PM_{2.5} from 2014 to 2016. Violations of the state and federal 8-hour standards for O₃ occurred in 2014 and 2016. The state 1-hour ozone standard was exceeded once in 2014. Air quality data is shown on Table 5.2-1, *Air Quality Monitoring Data*.

Table 5.2-1
AIR QUALITY MONITORING DATA

Air Pollutant	2014	2015	2016
Ozone			
Max 1-hour (ppm)	0.099	0.077	0.087
Days > CAAQS (0.09 ppm)	1	0	0
Max 8-hour (ppm)	0.081	0.070	0.075
Days > CAAQS/NAAQS (0.070 ppm)	4	0	3
Particulate Matter (PM₁₀)			
Max Daily (µg/m ³)	39.0	39.0	36.0
Days > NAAQS (150 µg/m ³)	0	0	0
Days > CAAQS (50 µg/m ³)	0	0	0
Particulate Matter (PM_{2.5})			
Max Daily (µg/m ³)	20.2	25.7	20.3
Days > NAAQS (35 µg/m ³)	0	0	0
Nitrogen Dioxide (NO₂)			
Max 1-hour (ppm)	0.051	0.051	0.053
Days > NAAQS (0.10 ppm)	0	0	0
Days > CAAQS (0.18 ppm)	0	0	0

Sources: CARB 2016a (www.arb.ca.gov); USEPA 2017b (http://www.epa.gov/airdata/ad_rep_con.html)
(Used for 1-hour CO)

> = exceeding; ppm = parts per million; µg/m³ = micrograms per cubic meter;

Standard Mean = Annual Arithmetic Mean

NAAQS = National Ambient Air Quality Standards; CAAQS = California Ambient Air Quality Standards

5.2.2 Regulatory Framework

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to the health and welfare of the general public. The USEPA is responsible for enforcing the Federal CAA of 1970, and its 1977 and 1990 Amendments. The CAA required the USEPA to establish National Ambient Air Quality Standards (NAAQS), which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for several criteria air pollutants, which are introduced above. Table 5.2-2, *California and National Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

The CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards. The CARB established the more stringent California

Ambient Air Quality Standards (CAAQS) for O₃, PM₁₀, PM_{2.5}, CO, NO₂, SO₂, and Pb through the California Clean Air Act of 1988 (CCAA), and has also established CAAQS for additional pollutants, including SO₄, H₂S, vinyl chloride, and visibility-reducing particles. Areas that do not meet the NAAQS or the CAAQS for a particular pollutant are considered to be “nonattainment areas” for that pollutant. On April 30, 2012, the SDAB was classified as a marginal nonattainment area for the 8-hour NAAQS for O₃ (CARB 2015). Effective June 3, 2016, the USEPA determined that 11 areas, including the SDAB, failed to attain the 2008 O₃ NAAQS by the applicable attainment date of July 20, 2015, and thus were reclassified as “Moderate” for the 2008 O₃ NAAQS. The SDAB is an attainment area for the NAAQS for all other criteria air pollutants including PM₁₀ and PM_{2.5}. The SDAB is currently classified as a nonattainment area under the CAAQS for O₃, PM₁₀, and PM_{2.5} (SDAPCD 2017).

The CARB is the state regulatory agency with the authority to enforce regulations to both achieve and maintain the NAAQS and CAAQS. The SDAPCD is responsible for developing and implementing the rules and regulations designed to attain the NAAQS and CAAQS, as well as permitting new or modified sources, developing air quality management plans, and adopting and enforcing air pollution regulations for San Diego County.

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for the attainment and maintenance of the ambient air quality standards in the SDAB. The SDAPCD prepared the San Diego County Regional Air Quality Strategy (RAQS), which was initially adopted in 1991, and is updated on a triennial basis. The most recent version of the RAQS was adopted by the SDAPCD in 2016. As part of, and attached to, the RAQS are the Transportation Control Measures for the air quality plan prepared by SANDAG. Together, the RAQS and Transportation Control Measures provide the framework for achieving attainment of the CAAQS. The local RAQS, in combination with the RAQS from all other California nonattainment areas with serious (or worse) air quality problems, is submitted to the CARB, which develops the California State Implementation Plan (SIP). The CARB then submits the SIP to the USEPA for approval and publication in the *Federal Register*.

**Table 5.2-2
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	National Standards	
			Primary ^a	Secondary ^b
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM _{2.5}	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12.0 µg/m ³	12.0 µg/m ³	15 µg/m ³
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9.0 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	–

**Table 5.2-2 (cont.)
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS**

Pollutant	Averaging Time	California Standards	National Standards	
			Primary ^a	Secondary ^b
SO ₂	24 Hour	0.04 ppm (105 µg/m ³)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	–
Pb	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	
SO ₄	24 Hour	25 µg/m ³		
H ₂ S	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)		

Source: CARB 2016b

Note: More detailed information about the data presented in this table can be found at the CARB website (www.arb.ca.gov).

O₃: ozone; ppm: parts per million; µg/m³: micrograms per cubic meter; PM₁₀: respirable particulate matter;

AAM: Annual Arithmetic Mean; PM_{2.5}: fine particulate matter; CO: carbon monoxide;

mg/m³: milligrams per cubic meter; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; km: kilometer; –: No Standard; Pb: lead;

SO₄: sulfates; H₂S: hydrogen sulfide.

^a National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

^b National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County as part of the development of the County's General Plan. While SANDAG collaborates with the SDAPCD on the development of the portion of the SIP applicable to the SDAB, the SDAPCD is the lead agency. As such, the SDAPCD is responsible for projecting all future mobile source emissions using EMFAC2014.

The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin.

The current federal and state attainment status (Table 5.2-3, *Federal and State Air Quality Designation*) for San Diego County is as follows:

**Table 5.2-3
FEDERAL AND STATE AIR QUALITY DESIGNATION**

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	(No federal standard)	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM ₁₀	Unclassifiable ¹	Nonattainment
PM _{2.5}	Attainment	Nonattainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassifiable
Visibility	(No federal standard)	Unclassifiable

Source: SDAPCD 2017

¹ At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

5.2.3 Significance Determination Thresholds

Based on the SDAPCD Screening Level Thresholds and the City's CEQA Significance Determination Thresholds (City 2016a), which have been modified to guide a programmatic analysis of the proposed BASASP, a significant impact related to air quality would occur if the proposed BASASP would:

1. Conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP;
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Result in a cumulatively considerable net increase of a criteria pollutant for which the SDAB is in nonattainment under the NAAQS or CAAQS;
4. Expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations; or
5. Create objectionable odors affecting a substantial number of people.

To determine whether a project would (a) result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, or (b) result in a cumulatively considerable net increase of PM₁₀ and PM_{2.5} or exceed quantitative thresholds for O₃ precursors, NO_x and VOCs, project emissions may be evaluated based on the quantitative emission thresholds established by the SDAPCD. As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 for the preparation of Air Quality Impact Assessments (AQIAs). The South Coast Air Quality Management District's (SCAQMD's) screening threshold of 55 pounds per day or 10 tons per year is being applied to this analysis as a significance threshold for PM_{2.5}.

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality. The screening thresholds are included in Table 5.2-4, *Screening Level Thresholds for Air Quality Impact Analysis*.

**Table 5.2-4
SCREENING LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS**

Pollutant	Total Emissions		
Construction Emissions (Pounds per Day)			
Respirable Particulate Matter (PM ₁₀)	100		
Fine Particulate Matter (PM _{2.5})	55		
Oxides of Nitrogen (NO _x)	250		
Oxides of Sulfur (SO _x)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	137		
Operational Emissions			
	Pounds per Hour	Pounds per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	---	55	10
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds (Pb)	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	137	15
Toxic Air Contaminant Emissions			
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT		
Non-Cancer Hazard	1.0		

Source: SDACPD Rule 20.2 and Rule 1210

T-BACT = Toxics Best Available Control Technology

5.2.4 Issue 1: Conformance to the Regional Air Quality Strategy

Would the proposed BASASP conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP?

5.2.4.1 Impacts

The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for O₃. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O₃ NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are regulated by the USEPA and the CARB, and the emissions and reduction strategies related to mobile sources are considered in the RAQS and the SIP.

The RAQS relies on information from CARB and SANDAG in order to project future emissions and determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. The CARB's mobile source emission projections and SANDAG's growth

projections are based on population and vehicle trends, and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with the growth anticipated by the general plans of each city and the County would be consistent with the RAQS. In the event that a project proposes development which is less dense than anticipated within the City's General Plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than anticipated in the City's General Plan and SANDAG's growth projections upon which the RAQS is based, the project would be in conflict with the RAQS and the SIP, and might have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the proposed project and the surrounding projects exceed the growth projections used in the RAQS for the specific sub-regional area.

The RAQS includes anticipated growth associated with the currently adopted Pacific Beach Community Plan. Amending the adopted Pacific Beach Community Plan to accommodate the development proposed in the BASASP might result in an inconsistency between the RAQS and the proposed amendment. Relative to the adopted Pacific Beach Community Plan, the proposed project would:

- increase the number of residential units by 287 percent;
- increase the amount of land designated for retail/commercial by 25 percent; and
- decrease the amount of land designated for industrial uses by 49 percent.

Due to these land use changes, the proposed project is not consistent with the RAQS. Additionally, as discussed in the traffic impact study prepared for the proposed project, the proposed land use designations would be expected to generate more average daily trips (ADT) than the uses currently allowed under the adopted Pacific Beach Community Plan (55,625 ADT compared to 31,032 ADT) (Kimley-Horn 2017). Thus, neither the proposed land uses nor the estimated vehicle trips from the BASASP area were included in the emissions assumptions contained within the RAQS. The proposed project is therefore inconsistent with the RAQS, and could potentially impede the goals contained within the RAQS.

Another measurement tool in determining consistency with the RAQS is to determine how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles travelled (VMT) both within the project planning area and the community plan area in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the RAQS. The proposed project would be consistent with the goals of the RAQS to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The proposed BASASP supports the multi-modal strategy of SANDAG's Regional Plan (RP) through improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station. Policies contained within the proposed BASASP's Land Use and Mobility chapters would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. Furthermore, the proposed project's access to transit also results in the BASASP area being located within a designated Transit Priority Area (TPA) consistent with Senate Bill (SB) 743. This type of development is consistent with the goals of the RAQS for reducing emissions associated with new development.

5.2.4.2 Significance of Impact

Because the BASASP is proposing an increase in density and ADT beyond what was included for the area in the RAQS, impacts associated with conformance to regional air quality plans would be potentially significant.

5.2.4.3 Mitigation Framework

Mitigation for inconsistencies with the RAQS would be as follows:

AQ-1 The City shall provide a revised housing and employment forecast to SANDAG to ensure that any revisions to the population and employment projections used by the SDAPCD in updating the RAQS and SIP will accurately reflect anticipated growth due to the proposed BASASP.

5.2.4.4 Significance After Mitigation

The proposed project would not conform with the RAQS and SIP and would result in a significant and unavoidable impact. These significant impacts would be reduced to less than significant when the RAQS and SIP are updated. Mitigation Measure AQ-1 requires that the City provide a revised housing and employment forecast to SANDAG to ensure that any revisions to the population and employment projections are considered. The provision of housing information would assist SANDAG in revising the population forecasts; however, until the anticipated growth is included in the emissions estimates of the RAQS and the SIP, impacts would remain significant and unavoidable.

5.2.5 Issue 2: Conformance to Federal and State Ambient Air Quality Standards

Would the proposed BASASP result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

5.2.5.1 Impacts

Future development pursuant to the proposed project would generate criteria air pollutants in the short term during construction and in the long term during operation. To determine whether the proposed project would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, the proposed project's emissions were evaluated based on the quantitative emissions thresholds established by the SDAPCD (as shown in Table 5.2-4).

Construction

Construction activities associated with new development under the proposed project would result in emissions of fugitive dust from demolition and site grading activities, heavy construction equipment exhaust, and vehicle trips associated with workers commuting to and from the site and from trucks hauling materials. The exact number and timing of individual development projects that would occur as a result of implementation of the proposed project are unknown at this time; therefore,

project-level emissions estimates cannot be determined at the program level. Subsequent development projects would need to analyze specific construction-related criteria air pollutant impacts to ensure that emissions remain below the SDAPCD thresholds. Because of the likely potential of individual projects to exceed the SDAPCD screening thresholds, implementation of the proposed project could result in potentially significant impacts related to construction emissions.

Operation

Operational source emissions would originate from traffic generated within the BASASP area or as a result of future development pursuant to the proposed project. Area source emissions would result from activities such as the use of fireplaces and consumer products. In addition, landscape maintenance activities associated with the proposed land uses would produce pollutant emissions.

Generally, discretionary, program-level planning activities, such as general plans, community plans, specific plans, etc., are evaluated for consistency with the local air quality plan. In contrast, project-level thresholds are applied to individual project-specific approvals, such as a proposed development project. At the program level, the analysis looks at the emissions of build-out of the proposed project in relation to the adopted Pacific Beach and Clairemont Mesa Community Plans (herein referred to as Community Plans) to determine if the emissions would exceed the emissions forecasts included in the RAQS. Considering that the adopted Community Plans projects have not yet been completed at the time of this analysis, an analysis of existing emissions compared with the proposed project would not accurately disclose the impacts of the proposed project. Rather, comparing future operations with the adopted Community Plans and the proposed project provides the best indicator of the proposed project's long-term effect on emissions. Therefore, the analysis of the proposed project is based on the net change in future emissions estimates derived from the adopted Community Plans.

As such, the analysis evaluates the potential for future development within the BASASP area to result in, or contribute to, a violation of any air quality standard based on the net change in pollutant emissions that would result from the adopted Community Plans in the year 2035 compared to the emissions resulting from the proposed project in the year 2035.

BASASP Characteristic Assumptions

Air emissions were calculated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2 (SCAQMD 2013). CalEEMod prompts the user to enter a given project's location, setting, climate zone, utility provider, operational year, and the specific land uses that will occur. For this analysis, the location was selected as San Diego County with an urban (versus suburban or rural) setting, in climate zone 13, served by SDG&E. The operational year was set to 2035, consistent with the traffic impact study.

Land Use Assumptions

For comparative purposes, air emissions were calculated for land uses under buildout of the adopted Community Plans and the proposed BASASP land use plan for the year 2035 using CalEEMod 2016.3.2. Table 5.2-5, *Adopted Community Plans and Proposed BASASP Land Uses*, summarizes the buildout land use quantities that were input to CalEEMod to estimate future BASASP area emissions for both the adopted Community Plans and proposed BASASP.

Table 5.2-5
ADOPTED COMMUNITY PLANS AND PROPOSED BASASP BUILDOUT LAND USES

Land Use	Adopted Community Plans			Proposed BASASP		
	Existing to Remain	Proposed New Development	Total	Existing to Remain	Proposed New Development	Total
Arterial Commercial (square feet)	184,588	127,408	311,996	184,588	383,577	568,165
Automobile Dealership (square feet)	52,677	0	52,677	0	0	0
Automobile Repair Shop (square feet)	8,000	0	8,000	0	0	0
Health Club (square feet)	40,418	0	40,418	0	0	0
Hotel (Low-Rise) (Motel) (square feet)	78,410	0	78,410	0	0	0
Industrial Park (square feet)	109,100	0	109,100	0	0	0
Light Industry – General (square feet)	0	114,698	114,698	0	114,698	114,698
Multi-Family Residential (dwelling units)	666	468	1,134	672	4,055	4,727
Office (square feet)	72,147	0	72,147	0	0	0
Health Care (square feet)	43,192	0	43,192	43,192	0	43,192
Transportation (square feet)	400	0	400	400	0	400
Public Storage (square feet)	308,746	0	308,746	308,746	0	308,746
Service Station (square feet)	2,556	0	2,556	2,556	0	2,556
Single Family (dwelling units)	87	0	87	2	0	2

Source: HELIX 2018a

Portions of existing developed lands within the BASASP area would likely not change as part of the proposed project. These include recently constructed multi-family residences, recently entitled projects, and existing major public and institutional uses. Because these existing developed land uses were built to older, less stringent code requirements than those applicable to future development or re-development, the existing developed land uses that will remain and not change, and the land uses that would be developed or re-developed as part of the buildout of the adopted Community Plans or the proposed project would have different energy consumptions associated with them. In order to reflect these energy consumption differences, emissions were estimated using two separate CalEEMod runs for the land uses in the adopted Community Plans and proposed BASASP. These runs are discussed in further detail below.

The quantities listed in Table 5.2-5 include the existing developed land uses that were assumed to remain and not be redeveloped as part of the proposed project, and the proposed new development. It was assumed that the energy-related emissions associated with the existing land uses that would not be redeveloped were related to older energy codes, while those associated with new development would be the result of recent energy code revisions. The two model runs were then added together to obtain the total project emissions associated with buildout of either the adopted Community Plans or the proposed project.

Estimating Vehicle Emissions

CalEEMod estimates vehicle emissions by first calculating trip rate, trip length, trip purpose, and trip type percentages (e.g., home to work, home to shop, home to other) for each land use type, based on the land use types and quantities entered by the user in the land use module. For this analysis, the CalEEMod default trip rates and lengths were edited to reflect the trip rates and VMT identified for each land use subtype in the traffic impact study prepared for the proposed project.

Estimating Energy Use Emissions

Air pollutants are emitted as a result of activities in buildings for which natural gas is used as an energy source. CalEEMod estimates emissions from energy use by multiplying average rates of residential and non-residential energy consumption by the quantities of residential units and non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by the natural gas air pollutant emission factors applicable to the project location and utility provider.

CalEEMod default energy values are based on the California Energy Commission- (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies, which identify energy use by building type and climate zone. Each land use type input to the land use module is mapped in the energy module to the appropriate CEUS and RASS building type. Because these studies are based on older buildings, adjustments were made in CalEEMod to account for changes to Title 24 building codes. The default adjustment is to the 2016 Title 24 California Energy Code (Part 6 of the State Building Standards Code). Should a user wish to simulate the 2005 Title 24 California Energy Code, adjustments are available in the model by selecting the "use historical data" box.

Energy emissions in the BASASP area were estimated using two runs of the model. One run assumed the default 2016 Title 24 California Energy Code for the portion of the total buildout land

use quantities that would be new (i.e., the Proposed New Development land uses), and would therefore be constructed in accordance with the 2016 Title 24 California Energy Code. The second model run for the proposed project selected the “historical data” box for the portion of the total buildout land use quantities that comprise existing land uses that would not change (i.e., the Existing to Remain land uses). The two model runs were then added together to obtain the total projected energy emissions associated with buildout of the proposed project. Table 5.2-5 lists the buildout land use quantities that were input to the “Existing to Remain” and “Proposed New Development” CalEEMod energy module runs.

Estimating Area Source Emissions

This CalEEMod module estimates the emissions that would occur from the use of hearths, wood stoves, and landscaping equipment. This module also estimates emissions associated with the use of consumer products and architectural coatings that have VOCs. The use of hearths and woodstoves directly emits air pollutants from the combustion of natural gas, wood, or biomass, some of which are thus classified as biogenic. CalEEMod estimates emissions from hearths and woodstoves only for residential uses based on the type and size of the features of the residential land use inputs.

The use of landscape equipment emits air pollutants associated with the equipment’s fuel combustion. CalEEMod estimates the number and type of equipment needed based on the number of summer days given the project’s location as entered in the project characteristics module. The model defaults for hearths, woodstoves, and landscaping equipment were assumed.

Architectural VOC emissions for operations are primarily associated with maintenance activities. These activities are not covered under CALGreen. However, coatings sold in San Diego County must comply with SDAPCD Rule 67.0 (Architectural Coatings). As a worst-case, the upper end SDAPCD architectural coating VOC limit of 250 milligrams per liter was used in each run.

Total Operational Emissions

A summary of the modeling results, which includes mobile, area, and energy source emissions, is shown in Table 5.2-6, *Maximum Daily Operational Emissions*. As identified in Table 5.2-6, BASASP operational emissions of the criteria air pollutants VOC, CO, PM₁₀, and PM_{2.5} would exceed the daily thresholds.

**Table 5.2-6
MAXIMUM DAILY OPERATIONAL EMISSIONS
(Pounds per Day)**

Emission Sources	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Adopted Community Plans (Year 2035)						
Area Sources	1,933	37	2,395	4	322	322
Energy Sources	1	8	5	<1	1	1
Vehicular (Mobile) Sources	68	300	1,129	6	716	193
Total Adopted	2,002	345	3,529	10	1,039	516
BASASP Emissions (Year 2035)						
Area Sources	7,419	146	9,322	16	1,255	1,255
Energy Sources	2	18	8	<1	1	1
Vehicular (Mobile) Sources	87	386	1,311	6	800	216
Total BASASP	7,508	550	10,641	22	2,056	1,472
Net Emissions	5,506	205	7,112	12	1,017	956
Screening Level Thresholds	137	250	550	250	100	55
Exceed Threshold?	Yes	No	Yes	No	Yes	Yes

Source: HELIX 2018a

Note: CalEEMod mobile sources emissions were adjusted to remove the GHG reductions from the Pavley I and Low Carbon Fuel Standard (LCFS). Totals may not add up exactly due to rounding.

5.2.5.2 Significance of Impact

Criteria air pollutants generated during construction of new development pursuant to the proposed project could produce pollutants that would exceed State and federal requirements. Operational emissions would be associated with vehicle trips generated by development within the BASASP area, along with area sources such as the use of fireplaces and landscaping. Based on the evaluation of air emissions, emissions associated with the proposed project would exceed the screening level thresholds for VOC, CO, PM₁₀, and PM_{2.5}. Thus, the increase in future emissions of CO, particulate matter and ozone precursors (VOC) associated with the proposed project would result in a significant air quality impact.

5.2.5.3 Mitigation Framework

The following mitigation framework would reduce potential impacts of buildout under the proposed project to State and federal air quality standards.

- AQ-2** To identify potential impacts resulting from construction activities, proposed development projects that are subject to CEQA shall have construction-related air quality impacts analyzed using the latest available CalEEMod model, or other analytical method determined in conjunction with the City. The results of the construction-related air quality impacts analysis shall be included in the project's CEQA documentation. If such analyses identify potentially significant regional or local air quality impacts based on the emissions thresholds presented in Table 5.2-4, the City shall require the incorporation of appropriate mitigation to reduce such impacts. Examples of potential mitigation measures are provided in Mitigation Measure AQ-3, below.

AQ-3 For future individual development projects that would exceed daily construction emissions thresholds established by the City, best available control measures/technology shall be incorporated to reduce construction emissions to the extent feasible. Best available control measures/technology includes:

- Minimizing simultaneous operation of multiple pieces of construction equipment;
- Using more efficient, or low pollutant emitting equipment, e.g., Tier III- or Tier IV- rated equipment;
- Using alternative fueled construction equipment;
- Incorporating dust control measures for construction sites to minimize fugitive dust (e.g., watering, soil stabilizers, and speed limits); and/or
- Minimizing idling time by construction vehicles.

AQ-4 To identify potential impacts resulting from operational activities associated with future development, proposed development that are subject to CEQA shall have long-term operational-related air quality impacts analyzed using the latest available CalEEMod model, or other analytical method determined in conjunction with the City. The results of the operational-related air quality impacts analysis shall be included in the project's CEQA documentation. If such analyses identify potentially significant regional or local air quality impacts based on the thresholds presented in Table 5.2-4, the City shall require the incorporation of appropriate mitigation to reduce such impacts to below a level of significance. Examples of potential measures include the following:

- Installation of electric vehicle charging stations;
- Improvement of walkability design and pedestrian network;
- Increasing transit accessibility and frequency by incorporating Bus Rapid Transit (BRT) routes included in the SANDAG Regional Plan;
- Limiting parking supply and unbundling parking costs; and
- Lowering parking supply below ITE rates and separating parking costs from property costs.

5.2.5.4 Significance After Mitigation

The ability of future development to successfully implement the actions required to fully meet these mitigation measures cannot be guaranteed at this time. Also, the City cannot guarantee that ministerial projects will have less than significant air quality impacts or will be mitigated to less than significant. Thus, air pollutant impacts from construction and operation under the proposed project are considered significant and unavoidable.

5.2.6 Issue 3: Cumulatively Considerable Net Increase of Criteria Pollutants

Would the proposed BASASP result in a cumulatively considerable net increase of a criteria pollutant for which the SDAB is in nonattainment of NAAQS or CAAQS?

5.2.6.1 Impacts

The cumulative area for regional air quality analysis is the SDAB. The SDAB is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5} under State standards and a nonattainment area for O₃ under federal standards. The RAQS is the most appropriate document for evaluating the proposed project's cumulative effects because the RAQS evaluates air quality emissions for the whole of the SDAB using a future development scenario. As discussed in Section 5.2.4, the proposed project would conflict with implementation of the RAQS. Furthermore, as discussed under Section 5.2.5, the proposed project's operational regional VOC (an ozone precursor), as well as PM₁₀ and PM_{2.5} emissions would exceed the SDAPCD's Screening Level Thresholds. Because it cannot be demonstrated at the programmatic level that future development would not exceed applicable air quality standards, impacts are considered cumulatively considerable and significant.

5.2.6.2 Significance of Impact

The BASASP's VOC emissions could contribute to existing violations of the State and federal O₃ standards. PM₁₀ and PM_{2.5} emissions could also contribute to existing violations of their respective standards. Impacts would be potentially significant.

5.2.6.3 Mitigation Framework

Mitigation Measures AQ-2 through AQ-4 would reduce criteria pollutant emissions. No additional mitigation is available.

5.2.6.4 Significance After Mitigation

As discussed previously, the proposed project is intended to further express General Plan policies in the BASASP area through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide zoning. The two documents work together to establish the framework for growth and development in the BASASP area. The proposed BASASP contains six chapters, each providing neighborhood-specific goals and recommendations. These goals and recommendations are consistent with development design guidelines, other mobility and civic guidelines, incentives, and programs in accordance with the goals stated in the General Plan. Mitigation Measures AQ-2 through AQ-4 would reduce criteria air pollutant emissions, but the contribution of air pollutants to the SDAB would result in a significant and unavoidable cumulative impact to air quality within the SDAB because the ability of future development to successfully implement the actions required to fully meet these mitigation measures cannot be guaranteed at the programmatic level, nor can the City guarantee that ministerial projects will have less than significant air quality impacts or will be mitigated to less than significant.

5.2.7 Issue 4: Impacts to Sensitive Receptors

Would the proposed BASASP expose sensitive receptors (including, but not limited to, residences, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations?

5.2.7.1 Impacts

Impacts to sensitive receptors are typically analyzed for operational period CO hot spots, and exposure to TACs. An analysis of the proposed project's potential to expose sensitive receptors to these pollutants is provided below.

Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. If future development would increase the average delay at signalized intersections operating at level of service (LOS) E or F, or cause an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project, a quantitative screening is required. According to the BASASP Traffic Impact Study, five of the 29 intersections analyzed within the BASASP area would have a traffic-related impact before inclusion of the recommended traffic mitigation measures (Kimley-Horn 2017):

- Balboa Avenue at Morena Boulevard,
- Balboa Avenue at Clairemont Drive,
- Garnet Avenue at Olney Street,
- Garnet Avenue at Mission Bay Drive, and
- Morena Boulevard at Jutland Drive.

The Transportation Project-Level Carbon Monoxide Protocol (Caltrans 1998) requires the modeler to model the intersections that have worst LOS and the highest traffic volumes. If the selected intersections do not show an exceedance of the NAAQS and CAAQS, none of the other intersections will. Of the intersections identified above, Balboa Avenue at Morena Boulevard has the worst LOS and Garnet Avenue at Mission Bay Drive has the highest traffic volumes; therefore, these two intersections were carried forward for more detailed modeling. As recommended in the Protocol, receptors were located at locations that were approximately 3 meters (10 feet) from the mixing zone, and at a height of 1.8 meters (6 feet). Emission factors from the EMFAC2014 model for the year 2035 at a temperature of 60°F and 50 percent humidity were used in the CALINE4 model.

In accordance with the Protocol, it is also necessary to estimate future background CO concentrations in the vicinity of the proposed project to determine the potential impact plus background and evaluate the potential for CO hotspots due to the proposed project. The existing maximum 1-hour and 8-hour background concentrations of CO of 1.7 and 1.2 ppm were used to represent future maximum background 1-hour and 8-hour CO concentrations (USEPA 2017b). CO concentrations in the future may be lower as inspection and maintenance programs and more stringent emissions controls are placed on vehicles.

Modeled 1-hour CO concentrations were scaled to evaluate maximum predicted 8-hour CO concentrations using the recommended persistence scaling factor of 0.7 for urban locations. The CALINE4 model outputs are provided at the end of Appendix B. Table 5.2-7, *CO Hotspots Modeling Results*, presents a summary of the predicted CO concentrations (impact plus background) for the two intersections evaluated in the BASASP area. As shown in Table 5.2-7, the predicted CO concentrations would be substantially below the 1-hour and 8-hour NAAQS and CAAQS for CO. Therefore, no exceedances of the CO standard are predicted, and the proposed project would not cause or contribute to a violation of the CO air quality standard. CO hotspot impacts would be less than significant.

**Table 5.2-7
CO HOTSPOTS MODELING RESULTS**

Intersection	Peak Period	Maximum 1-hour Concentration (ppm)	Maximum 8-hour Concentration (ppm)
Balboa Avenue at Morena Boulevard	AM	2.9	2.0
	PM	3.3	2.3
Garnet Avenue at Mission Bay Drive	AM	3.6	2.5
	PM	3.9	2.7
California Ambient Air Quality Standard		20	9.0
National Ambient Air Quality Standard		35	9.0
Significant Impact?		No	No

Source: HELIX 2018a

Exposure to Toxic Air Contaminants

Construction

Implementation of the proposed project would result in the construction of new buildings, structures, paved areas, and other improvements. Heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with this construction could generate diesel particulate matter (DPM), which the CARB identified as a TAC. Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as building construction or architectural coatings. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks. Building construction activities for individual projects, as part of the proposed project implementation, are estimated to last approximately six months to one year. According to the Office of Environmental Health Hazard Assessment, health risk assessments (HRAs) used to determine the exposure of sensitive receptors to TAC emissions should be based on a

30-year exposure period; however, such assessments should also be limited to the period/duration associated with the construction activities which implement the proposed project. Thus, if the duration of potentially harmful construction activities near a sensitive receptor was one year, the exposure would be approximately three percent of the total exposure period used for typical health risk calculations. Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and at various locations over the span of several years (build out is year 2035), it is not anticipated that the implementation of the proposed project would expose sensitive receptors to substantial construction-related TAC concentrations. Therefore, this impact would be less than significant.

Stationary Sources

The proposed project includes land uses which may generate TACs affecting adjacent sensitive land uses. In air quality terms, individual land uses that emit air pollutants in sufficient quantities are known as stationary sources. The primary concern with stationary sources is local; however, they also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources are regulated by the local air pollution control or management district through the issuance of permits; in this case, the agency is the SDAPCD. The CARB and SDAPCD provide guidance on siting land uses to avoid health risks and nuisances. A common component of such guidance is the recommendation to site sensitive land uses outside specified buffers adjacent to or surrounding major emitters or facilities of concern. The CARB has developed the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance on land use compatibility with sources of TACs (CARB 2005). Table 5.2-8, *CARB Land Use Siting Recommendations*, summarizes the siting recommendations applicable to the BASASP area. CARB recommends that these buffers be considered when evaluating land use and collocation decisions.

**Table 5.2-8
CARB LAND USE SITING RECOMMENDATIONS**

Source Category	Recommended Buffer Distance (feet)
Freeways and High-Traffic Roads (freeways, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day)	500
Distribution Centers (that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week)	1,000
Dry Cleaners using Perchloroethylene (1 machine)	300
Dry Cleaners using Perchloroethylene (2 machines)	500
Dry Cleaners using Perchloroethylene (3 or more machines)	Requires consultation with SDAPCD
Large Gas Station (3.6 million gallons or more per year)	300
Other Gas Stations	50

Source: CARB 2005

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and to reduce risks. Additionally, Assembly Bill (AB) 2588, Air Toxics "Hot Spots" Information and Assessment Act, was

enacted in 1987, and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of AB 2588 are to collect emissions data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels.

In accordance with AB 2588, any new facility proposed that would have the potential to emit TACs would be required to assess air toxic problems that would result from their facility's emissions (SDAPCD 2010). If air emissions from a specific facility include toxic substances or exceed identified limits, the facility is required by the SDAPCD to provide information regarding emissions inventories and HRAs. If adverse health impacts exceeding public notification levels are identified, the facility should provide public notice and, if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Thus, with this regulatory framework, at the program level, impacts associated with stationary sources in the BASASP area would be less than significant.

Operation

The proposed project would include the development of residential and commercial land uses. Residential land uses do not typically generate substantial TAC emissions. Commercial land uses may potentially include stationary sources of TACs, such as dry-cleaning establishments, gas stations, and diesel-fueled back-up generators. As discussed above, these types of stationary sources, in addition to any other stationary sources that may emit TACs would be subject to SDAPCD rules and regulations. Land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources and manufacturing processes.

Individual development projects could be located within the siting distances recommended by the CARB as identified above in Table 5.2-8. However, CARB notes that these recommendations are advisory and should not be interpreted as defined "buffer zones," and that local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk, where necessary, CARB's position is that infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. Therefore, implementation of the proposed project would be consistent with the goals of the CARB handbook and would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

5.2.7.2 Significance of Impact

The analysis indicates there would be no potential for CO hot spots or exposure of sensitive receptors to substantial, project-generated, local CO emissions. Implementation of the proposed project would be consistent with the goals of the CARB handbook. Thus, air quality impacts to sensitive receptors would be less than significant.

5.2.7.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation measures are required.

5.2.7.4 Significance After Mitigation

Impacts would be less than significant.

5.2.8 Issue 5: Odor Impacts

Would the proposed BASASP create objectionable odors affecting a substantial number of people?

5.2.8.1 Impacts

Although the BASASP area is adjacent to industrial operations, there are no known sources of long-term odors in the area. In addition, there are no agricultural operations in the BASASP area which would generate odors. Similarly, future development under the proposed project is not expected to result in land uses that would produce objectionable odors.

5.2.8.2 Significance of Impact

Impacts associated with odors are anticipated to be less than significant.

5.2.8.3 Mitigation Framework

Impacts associated with the creation of objectionable odors would be less than significant; therefore, no mitigation is required.

5.2.8.4 Significance After Mitigation

Impacts associated with odors are anticipated to be less than significant.

5.3 Biological Resources

This section summarizes the Biological Technical Report for the proposed project prepared by HELIX Environmental Planning, Inc., (HELIX 2018b) and included as Appendix C. This section addresses the existing biological resources present in the BASASP area; provides analyses of impacts to the biological resources associated with implementation of the proposed project; and presents the types of mitigation that would be expected to reduce impacts to biological resources associated with subsequent development pursuant to the proposed project.

5.3.1 Existing Conditions

5.3.1.1 Vegetation Communities

The BASASP area is largely developed. As a result, native plant communities are localized, with the majority of the native vegetation communities occurring in the northern portion of the BASASP area, along Rose Creek on the northwestern edge, and the railroad right-of-way (ROW). Along Rose Creek, the native vegetation consists primarily of riparian communities. Diegan coastal sage scrub is the primary native plant community found along the railroad ROW. The following 10 vegetation communities/land cover types are present in the BASASP area:

- Freshwater marsh
- Southern willow scrub
- Southern riparian forest
- Non-native riparian
- Streambed
- Diegan coastal sage scrub
- Non-native grassland
- Eucalyptus woodland
- Disturbed habitat
- Developed

The approximate acreages of these vegetation communities/land cover types are presented in Table 5.3-1, *Vegetation Communities/Land Cover Types in the BASASP Area*, and shown on Figure 5.3-1, *Existing Vegetation Communities and Land Cover Types*. Each is described following Table 5.3-1.

**Table 5.3-1
VEGETATION COMMUNITIES/LAND COVER TYPES IN THE BASASP AREA**

Vegetation Community/ Land Cover Type	Acreage*
Wetland Communities	
Freshwater marsh	0.33
Southern willow scrub	0.22
Southern riparian forest	0.49
Non-native riparian	0.24
Streambed	1.06
Subtotal Wetland Communities	2.34
Upland Communities	
Diegan coastal sage scrub	1.77
Non-native grassland	1.41
Subtotal Upland Communities	3.18
Other Uplands	
Eucalyptus woodland	0.71
Disturbed habitat	15.54
Developed	189.73
Subtotal Other Uplands	205.98
TOTAL	211.50

Source: HELIX 2018b

*Rounded to the nearest 0.01 acre.

Wetland Communities

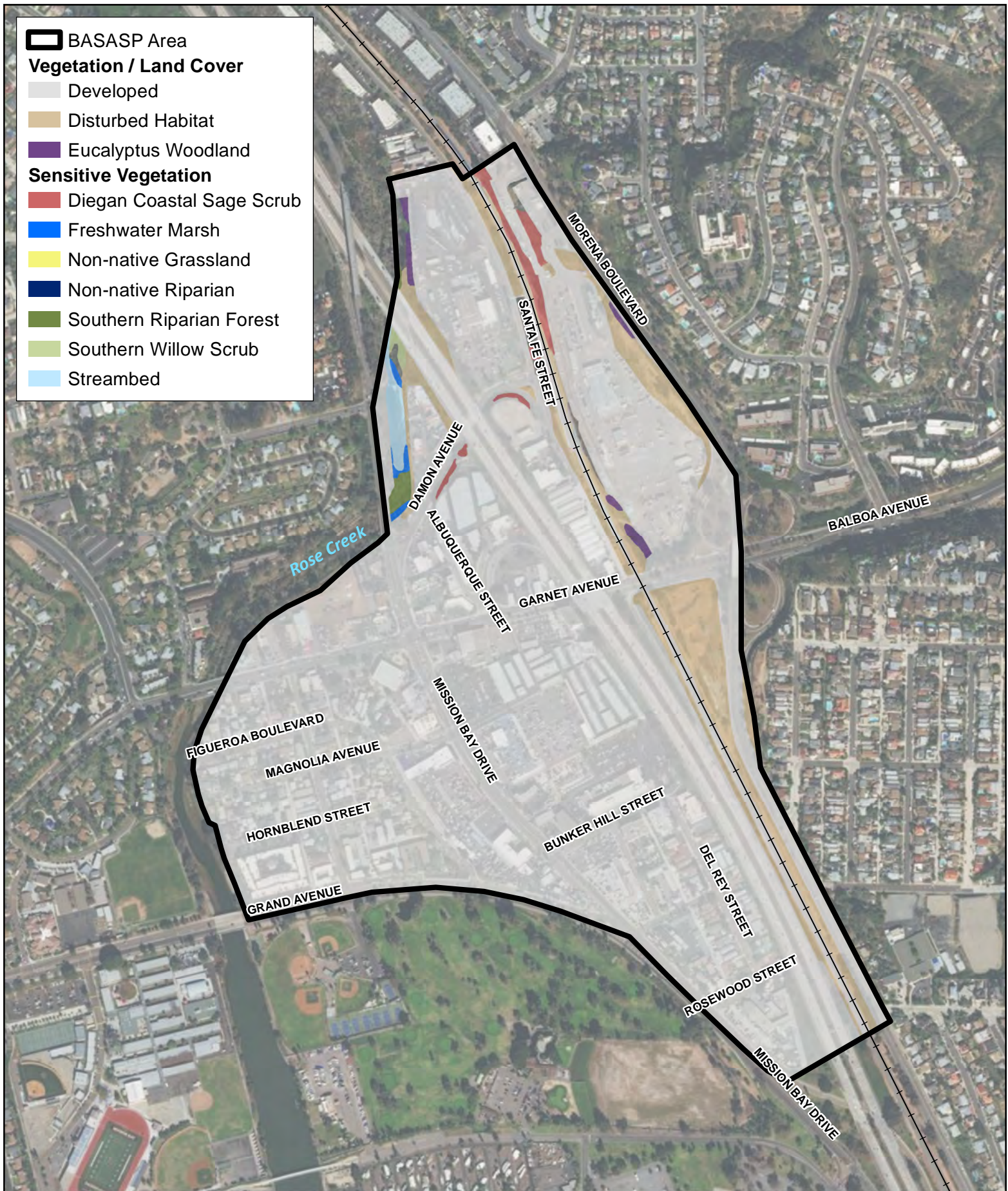
Wetlands, including riparian areas, are lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface. Wetlands vary widely because of regional and local differences in soil, topography, climate, hydrology, water chemistry, vegetation, and other factors.

Freshwater Marsh

Freshwater marsh is dominated by perennial, emergent monocots, which can reach heights of 12 to 15 feet. This vegetation type occurs along the coast and in coastal valleys near river mouths and around the margins of lakes and springs. These areas are permanently flooded by fresh water yet lack significant currents. This community consists of species such as cattails (*Typha* spp.) and bulrush (*Scirpus* spp.). Freshwater marsh has been mapped in three locations north of Damon Avenue to I-5 within Rose Creek.

Southern Willow Scrub

Southern willow scrub is a dense broad leaf, winter-deciduous community dominated by willow trees (*Salix* spp.). Often there is a component of Fremont cottonwood (*Populus fremontii*) and western sycamore (*Platanus racemosa*) and the community is generally dense enough to preclude any herbaceous understory. This community has been mapped in two locations along Rose Creek: one south of I-5, and a second north of Garnet Avenue.



Balboa Avenue Station Area Specific Plan

Existing Vegetation Communities and Land Cover Types

0 750 1,500
Feet



Figure 5.3-1

Southern Riparian Forest

Southern riparian forest is a dense riparian forest found along streams and rivers. It is usually dominated by western sycamore and cottonwood (*Populus* spp.), as well as other wetland species. Southern riparian forest has been mapped in four locations along Rose Creek: north of Damon Avenue, two locations north of the I-5, and east of the Mission Bay Drive on-ramp in the northwest portion of the BASASP area.

Non-Native Riparian

Non-native riparian areas are densely vegetated and support greater than 50 percent non-native and/or invasive species. They are often found in areas that have experienced disturbance and characteristic species include fan palm (*Washingtonia* spp.), castor-bean (*Ricinus communis*), date palm (*Phoenix* spp.), and/or giant reed (*Arundo donax*). Native species present may include Freemont cottonwood and/or willows. Non-native riparian habitat was mapped in two locations: one north and one south of I-5, within Rose Creek.

Streambed

Streambed is the channel through which water flows and is mapped as such when there is no vegetation present. Streambed was mapped west of I-5 within Rose Creek.

Upland Communities

Upland vegetation communities do not occur in wetland situations (e.g., inundated or containing saturated soils) and, in the BASASP area, consist of shrub, grassland, and woodland communities. These communities occur primarily on the eastern portion of the BASASP area, east of I-5, and in four locations west of I-5, east of Rose Creek.

Diegan Coastal Sage Scrub (Tier II)

Diegan coastal sage scrub is the southern form of coastal sage scrub comprised of low-growing, aromatic, drought-deciduous, soft-woody shrubs. Diegan coastal sage scrub is typically dominated by facultatively drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), and black sage (*Salvia mellifera*). This community is typically found on dry sites with steep slopes or clay-rich soils that are slow to release stored water. These sites often include south- and west-facing slopes and occasionally north-facing slopes, where the community can act as a successional phase to chaparral. In the BASASP area, Diegan coastal sage scrub has been mapped along the east and west side of the railroad ROW and along Damon Avenue.

Non-Native Grassland (Tier IIIB)

Non-native grassland occurs as a dense to sparse cover of non-native grasses, sometimes associated with species of showy-flowered, native, annual forbs. This community characteristically occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species in non-native grassland include oats (*Avena* spp.), red brome (*Bromus madritensis* ssp. *rubens*), ripgut grass (*Bromus diandrus*), ryegrass (*Lolium* sp.), and mustard (*Brassica* sp.). Most of the annual, introduced

species that make up the majority of the species biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California's. These two factors, in addition to severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasses with an annual-dominated, non-native grassland. These grasslands occur throughout San Diego County and serve as valuable raptor foraging habitat. Non-native grassland has been mapped within and to the east and west of the railroad ROW and north of I-5 and east of Rose Creek within the BASASP area.

Other Uplands

Four other land cover types are present within the BASASP area. All result from development, encroachment, or other human disturbance.

Eucalyptus Woodland (Tier IV)

Eucalyptus woodland is dominated by eucalyptus (*Eucalyptus* sp.), an introduced genus that has often been planted purposely for wind blocking, ornamental, and hardwood production purposes. Most groves are monotypic with the most common species being either the blue gum (*Eucalyptus gunnii*) or red gum (*E. camaldulensis* ssp. *obtusa*). The understory within well-established groves is usually very sparse due to the closed canopy and allelopathic nature of the abundant leaf and bark litter. If sufficient moisture is available, this species becomes naturalized and is able to reproduce and expand its range. The sparse understory offers only limited wildlife habitat; however, as a wildlife habitat, these woodlands can provide excellent nesting sites for a variety of raptors if the woodlands are not located in highly urbanized environments. During winter migrations, a large variety of warblers may be found feeding on the insects that are attracted to eucalyptus flowers. Eucalyptus woodland has been mapped east of I-5 on the east side of the BASASP area and is generally found adjacent to residential and commercial developments.

Disturbed Habitat (Tier IV)

Disturbed Habitat is a community that consists predominantly of non-native forbs, shrubs, and/or trees. Species such as mustard (*Brassica* sp.), tocalote (*Centaurea melitensis*), and pepper trees (*Schinus* spp.) are examples of species that can occur in non-native assemblages. Additionally, Disturbed habitat includes undeveloped areas modified by activities such as grading, scraping, or off-road vehicle use. Disturbed habitat occurs throughout the undeveloped land in the BASASP area and are found predominantly within the railroad ROW, adjacent to Morena Boulevard and the railroad ROW south of Balboa Avenue, as well as along the east side of Rose Creek and the east side of I-5, as well as, in three areas within the BASASP area: adjacent to the freeway west of the I-5, west of Morena Boulevard, and in a small area west of the railroad ROW.

Developed (Tier IV)

Developed land, which covers most of the BASASP area, includes residential, commercial, industrial, and transportation land uses. Developed land also includes areas of actively maintained landscaping.

5.3.1.2 Sensitive Biological Resources

According to City's Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City 2012), sensitive biological resources refer to upland and/or wetland areas that meet any one of the following criteria:

- (a) Lands that have been included in the City's Multiple Species Conservation Program (MSCP) Preserve (i.e., the Multi-Habitat Planning Area [MHPA]);
- (b) Wetlands;¹
- (c) Lands outside the MHPA that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;
- (d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations; or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12; or candidate species under the California Code of Regulations;
- (e) Lands containing habitats with MSCP Narrow Endemic species as listed in the Biology Guidelines; or
- (f) Lands containing habitats of MSCP Covered Species as listed in the Biology Guidelines.

Sensitive Vegetation Communities

Sensitive vegetation communities are those considered rare within the region or sensitive by the California Department of Fish and Wildlife (CDFW) and/or the City. These communities, in any form (e.g., including disturbed), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species.

Upland vegetation communities are divided into five tiers of sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City 2012). Tier I includes rare uplands. Tier II includes uncommon uplands. Tiers IIIA and IIIB include common uplands. Tier IV includes other uplands. Wetland communities are not assigned a tier.

Based on the definitions of "sensitive" above, the BASASP area supports seven sensitive vegetation communities, which includes all five of the existing wetland communities and two of the existing upland communities. Table 5.3-2, *Sensitive Vegetation Communities in the BASASP Area*, identifies these sensitive vegetation communities and their respective tier.

¹ City wetlands, specifically, are defined by the City Municipal Code (Chapter 11, Article 3, Division 1) as areas that are characterized by any of the following summarized conditions:

- 1) All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation;
- 2) Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities;
- 3) Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands; and/or
- 4) Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

**Table 5.3-2
SENSITIVE VEGETATION COMMUNITIES IN THE BASASP AREA**

Vegetation Community	Tier
Wetland Communities	
Freshwater marsh	--
Southern willow scrub	--
Southern riparian forest	--
Non-native riparian	--
Streambed	--
Upland Communities	
Diegan coastal sage scrub	Tier II
Non-native grassland	Tier IIIB

Source: HELIX 2018b

Sensitive Plant Species

Sensitive plant species are those that are considered federally, state, or California Native Plant Society (CNPS) rare, threatened, or endangered; MSCP Covered Species; or MSCP Narrow Endemic (NE) species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per the Municipal Code (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations; or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12; or candidate species under the California Code of Regulations;
- (b) A species is a Narrow Endemic species as listed in the Biology Guidelines in the Land Development Manual; and/or
- (c) A species is an MSCP Covered Species as listed in the Biology Guidelines in the Land Development Manual.

A plant species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS 2016).

Sensitive plant status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread, but exist naturally in small populations.

The sensitive plant species addressed in this section are known from the BASASP area based on information obtained from the literature review (see Appendix C). The potential to occur determinations are conservative given the programmatic level of this evaluation. Project-level evaluations would further refine the potential to occur determinations. Potential additional species, precise locations, and numbers of sensitive plant species would be identified through project-level surveys for proposed future development that falls within Environmentally Sensitive Lands (ESL). Table 5.3-3, *Sensitive or MSCP Narrow Endemic Plant Species Observed or with Potential to Occur within*

the BASASP Area, provides a comprehensive list of the sensitive plant species, including Narrow Endemics, observed or conservatively determined to have a potential to occur in the BASASP area.

**Table 5.3-3
SENSITIVE OR MSCP NARROW ENDEMIC PLANT SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State CNPS City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area	Lifeform and Bloom Period
San Diego thorn- mint (<i>Acanthomintha ilicifolia</i>)	FT SE CNPS 1B.1 MSCP Covered, NE	No Potential. Occurs on clay soils in chaparral, coastal sage scrub, valley and foothill grassland, and vernal pools. No clay soils are present in the BASASP area.	Annual herb April to June
Nuttall's acmispon (<i>Acmispon prostratus</i>)	-- -- CNPS 1B.1 --	No Potential. Occurs on coastal dunes and on sandy soils in coastal scrub. Found at elevations of 0 to 30 feet. Suitable sandy soils do not occur in the BASASP area.	Annual herb March to July
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE -- CNPS 1B.1 MSCP Covered, NE	Potential. Found in disturbed areas within chaparral, coastal sage scrub, grasslands, and vernal pools. Its range includes coastal San Diego County and western Riverside County south into Baja California, Mexico at elevations from approximately 65 to 1,360 feet.	Perennial, rhizomatous herb April to October
Aphanisma (<i>Aphanisma blitoides</i>)	-- -- CNPS 1B.2 MSCP Covered, NE	No Potential. Occurs in coastal bluff scrub, coastal dunes, and sandy coastal scrub along the coast. Suitable coastal habitat does not occur in the BASASP area.	Annual herb February to June
San Diego sagewort (<i>Artemisia palmeri</i>)	-- -- CNPS 4.2 --	Observed. Grows on sandy, mesic soils in chaparral, coastal scrub, riparian scrub, riparian forest, and riparian woodland. Found from 50 to 3,000 feet in elevation. Species was observed in Rose Creek.	Perennial, deciduous shrub February to September
Orcutt's pincushion (<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>)	-- -- CNPS 1B.1 --	No potential. Occurs in sandy, coastal bluff scrub, and coastal dunes. Found at elevations of 0 to 100 feet. Suitable sandy coastal habitat does not occur in the BASASP area.	Annual herb January to August

**Table 5.3-3 (cont.)
SENSITIVE OR MSCP NARROW ENDEMIC PLANT SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State CNPS City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area	Lifeform and Bloom Period
Salt marsh bird's-beak (<i>Cordylanthus maritimus</i> ssp. <i>maritimus</i>)	FE SE CNPS 1B.2 MSCP Covered	Potential. Occurs in coastal dunes, marshes, and swamps. Found at elevations of 0 to 100 feet. Coastal salt marsh was mapped adjacent to the BASASP area.	Annual herb May to October
San Diego sand aster (<i>Corethrogyne filaginifolia</i> var. <i>incana</i>)	-- -- CNPS 1B.1 --	Potential. Occurs in coastal bluff scrub, chaparral, and coastal scrub. Found at elevations from 10 to 375 feet. Diegan coastal sage scrub has been mapped in the BASASP area.	Perennial herb June to September
San Diego button-celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	FE SE CNPS 1B.1 MSCP Covered, NE	Potential. Found in mesic coastal scrub, valley and foothill grassland, and vernal pools at elevations of approximately 65 to 2,035 feet. Its range in California includes Los Angeles, Orange, Riverside, and San Diego counties. Diegan coastal sage scrub has been mapped in the BASASP area.	Annual/perennial herb April to June
San Diego barrel cactus (<i>Ferocactus viridescens</i>)	-- -- CNPS 2B.1 MSCP Covered	Potential. Found in chaparral, coastal scrub, valley and foothill grassland, and vernal pool areas at elevations of approximately 10 to 1,475 feet in coastal San Diego County. The optimal habitat for this species appears to be Diegan coastal sage scrub hillsides, often at the crest of slopes and among cobbles. Diegan coastal sage scrub has been mapped in the BASASP area.	Perennial stem succulent May to June
Beach goldenaster (<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i>)	-- -- CNPS 1B.1 --	Potential. Found in coastal chaparral, dunes, and scrub at elevations from sea level to approximately 4,020 feet. Its range in California is within Santa Barbara and San Diego counties. Diegan coastal sage scrub has been mapped in the BASASP area.	Perennial herb March to December
Southwestern spiny rush (<i>Juncus acutus</i> ssp. <i>leopoldii</i>)	-- -- CNPS 4.2 --	Observed. Found in mesic coastal dunes, meadows, alkaline seeps, coastal salt marshes, and swamps. Found at elevations of 10 to 2,950 feet. Species was observed in Rose Creek.	Perennial rhizomatous herb March to June
Sea dahlia (<i>Leptosyne maritima</i>)	-- -- CNPS 2B.2 --	Potential. Found in coastal bluff scrub and coastal scrub. Found at elevations between 15 and 495 feet. Diegan coastal sage scrub was mapped in the BASASP area.	Perennial herb March to May

Table 5.3-3 (cont.)
SENSITIVE OR MSCP NARROW ENDEMIC PLANT SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA

Species	Sensitivity ¹ Federal State CNPS City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area	Lifeform and Bloom Period
Coulter's goldfields (<i>Lasthenia glabrata</i> <i>ssp. coulteri</i>)	-- -- CNPS 1B.1 --	Potential. Found in coastal salt marshes and swamps, playas, and vernal pools. Grows at 3 to 4,000 feet in elevation. Coastal salt marsh was mapped adjacent to the BASASP area.	Annual herb February to June
Willowy monardella (<i>Monardella</i> <i>viminea</i>)	FE SE CNPS 1B.1 MSCP Covered	No Potential. Prefers alluvial ephemeral washes in chaparral, coastal scrub, riparian forest, riparian scrub, and riparian woodland. Found at elevations of 165 to 740 feet. BASASP area is outside of the elevation range for this species.	Perennial herb June to August
Spreading navarretia (<i>Navarretia</i> <i>fossalis</i>)	FT -- CNPS 1B.1 MSCP Covered, NE	Potential. Found in chenopod scrub, shallow freshwater marshes and swamps, playas, and vernal pools at elevations of approximately 100 to 2,150 feet. Vernal pools and vernal swales are the preferred habitats of this species, and it is rarely found in shallow pool. Its range in California is Los Angeles, Riverside, San Luis Obispo, and San Diego counties. Freshwater marsh was mapped in the BASASP area.	Annual herb April to June
California orcutt grass (<i>Orcuttia</i> <i>californica</i>)	FE SE CNPB 1B.1 MSCP Covered, NE	No Potential. Found in vernal pools at elevations of 50 to 2,165 feet in Los Angeles, Riverside, Ventura, and San Diego counties. California orcutt grass tends to grow in wetter portions of vernal pool basins but does not show much growth until the basins become somewhat dry. No vernal pools are present in the BASASP area.	Annual herb April to August
San Diego mesa mint (<i>Pogogyne</i> <i>abramsii</i>)	FE SE CNPS 1B.1 MSCP Covered, NE ³	No Potential. Occurs within vernal pools. No vernal pools are present in the BASASP area.	Annual herb March to July
Nuttall's scrub oak (<i>Quercus dumosa</i>)	-- -- CNPS 1B.1 --	No Potential. Grows on sandy, clay loams in closed-cone coniferous forest, chaparral, and coastal scrub. Grows at 50 to 1,310 feet in elevation. This perennial, evergreen shrub would have been observed if present.	Perennial evergreen shrub March to August
Chaparral ragwort (<i>Senecio aphanactis</i>)	-- -- CNPS 2B.2 --	Potential. Sometimes found on alkaline soils in chaparral, cismontane woodland, and coastal scrub. Grows at elevations from 50 to 2,625 feet. Diegan coastal sage scrub was mapped in the BASASP area.	Annual herb January to May

Table 5.3-3 (cont.)
SENSITIVE OR MSCP NARROW ENDEMIC PLANT SPECIES OBSERVED OR
WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA

Species	Sensitivity¹ Federal State CNPS City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area	Lifeform and Bloom Period
Estuary seablite (<i>Suaeda esteroa</i>)	-- -- CNPS 1B2 --	Potential. Found in coastal salt marshes and swamps at 0 to 15 feet in elevation. Coastal salt marsh was mapped adjacent to the BASASP area.	Perennial herb May to January

Source: HELIX 2018b

FT = federally listed endangered, FT = federally listed threatened, SE = state listed endangered, SR = state listed rare, ST = state listed threatened, SSC = state species of special concern, WL = watch list, NE = narrow endemic
Shaded cells denote species with potential to occur within the BASASP area.

1 See Appendix C for an explanation of sensitivity codes.

2 Lifeform and bloom period are from CNPS (2016).

Sensitive Wildlife

Sensitive animal species are those that are considered federal or State threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per City Municipal Code (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as endangered or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (b) A species is a Narrow Endemic species as listed in the Biology Guidelines in the Land Development Manual (City 2012); and/or
- (c) A species is an MSCP Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2012).

A species may also be considered sensitive if it is included on the CDFW's Special Animals List as a candidate for federal or state listing, state Species of Special Concern, state Watch List species, state Fully Protected species, or federal Bird of Conservation Concern. Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Additionally, avian nesting is protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code 3503.

The sensitive wildlife species addressed in this section are known from the BASASP area based on information obtained from the literature review (see Appendix C) or are considered to have potential to occur based on the habitats present in the BASASP area and the area's geographic

location. The potential to occur determinations are conservative given the programmatic level of this evaluation. Project-level evaluations would further refine the potential to occur determinations. Potential additional species and precise locations and numbers of sensitive wildlife species would be identified through project-level surveys for proposed future development. Table 5.3-4, *Sensitive Wildlife Species Observed or with Potential to Occur within the BASASP Area*, provides a comprehensive list of the sensitive wildlife species observed or conservatively determined to have a potential to occur in the BASASP area.

**Table 5.3-4
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Invertebrates		
San Diego fairy shrimp (<i>Branchinecta sandiegonensis</i>)	FE -- --	No Potential. San Diego fairy shrimp is a vernal pool habitat species found in small, shallow vernal pools. It can also be found in ditches and road ruts. The vernal pools often occur in patches of grassland and agriculture interspersed in coastal sage scrub and chaparral. The largest number of vernal pools inhabited by this species occurs in San Diego County. It also has been reported in Orange and Santa Barbara counties, California, and in Baja California, Mexico. No vernal pools are mapped in the BASASP area.
Mesa shoulderband (<i>Helminthoglypta coelata</i>)	-- S1 --	No Potential. Found in rock slides, beneath bark and rotten logs, and among coastal vegetation. Known only from a few locations in coastal San Diego County. Appropriate rocky habitat is not present in the BASASP area.
Riverside fairy shrimp (<i>Streptocephalus woottoni</i>)	FE -- MSCP Covered	No Potential. Found in moderate to deep (generally ranging from 10 inches to 5 to 10 feet in depth), longer-lived vernal pools and ephemeral wetlands in southern coastal California and northern Baja California, Mexico. Currently, presumed to occupy 60 or fewer pool complexes throughout southern California. No vernal pools are mapped in the BASASP area.

Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Amphibians		
Belding's orange-throated whiptail (<i>Aspidoscelis [Cnemidophorus] hyperythrus beldingi</i>)	-- SSC MSCP Covered	Potential. This lizard inhabits low-elevation coastal scrub, chamise-redshank chaparral, mixed chaparral, and valley-foothill hardwood habitats. It prefers washes and other sandy areas with patches of brush and rocks and does not require permanent water. It actively forages on the surface and scratches through surface debris taking a variety of small arthropods (Stebbins 1972). During periods of inactivity, individuals seek cover under objects such as rocks, logs, decaying vegetation, and boards, or in rock crevices. The Belding's orange-throated whiptail occurs at elevations from sea level up to approximately 3,410 feet from the Santa Ana River in Orange County, California and near Colton in San Bernardino County, California, west of the Peninsular Ranges and south throughout Baja California, Mexico. In the MSCP area, the species has been documented in Jamul, Santee, Alpine, Otay Mesa, Rancho San Diego, Marine Corps Air Station Miramar, and Escondido. Diegan coastal sage scrub was mapped in the BASASP area.
Birds		
Cooper's hawk (<i>Accipiter cooperii</i>)	-- WL MSCP Covered	No Potential. The Cooper's hawk nests in deciduous, conifer, and mixed woodlands. In southern California, it generally favors extensive riparian bottomlands (Garrett and Dunn 1981 in Grindrod 2005). Winter habitat requirements are poorly quantified, but Christmas bird count data suggest that Cooper's hawks use essentially the same habitats during winter and summer (Grindrod 2005). Although the BASASP area contains riparian woodland habitat, it is not extensive enough to support this species.
Western grebe (<i>Aechmophorus occidentalis</i>)	BCC -- --	Potential. Western grebes breed on freshwater lakes and marshes with extensive open water bordered by emergent vegetation. During winter, they move to saltwater or brackish bays, estuaries, or sheltered sea coasts and are less frequently found on freshwater lakes or rivers. Open water is present in Rose Creek that has the potential to support this species.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Tricolored blackbird (<i>Agelaius tricolor</i>)	BCC SSC MSCP Covered	No Potential. Breeding colonies require a source of water, suitable nesting substrate, and natural grassland, woodland, or agricultural cropland biomes in which to forage. Historically, breeding colonies had been strongly associated with emergent marshes, but more recently there has been a shift to non-natively vegetated and active agricultural areas. Although marsh habitat is present in the BASASP area, no suitable foraging habitat is present nearby.
California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	BCC WL MSCP Covered	Potential. This sparrow prefers coastal sage scrub but can also be found breeding in coastal bluff scrub, low-growing serpentine chaparral, and along the edges of tall chaparral habitats, as well as in open chaparral or coastal sage scrub and grasslands with scattered shrubs (Unitt 2004). Following a chaparral fire, suitable habitat may develop in the early stages of chaparral re-growth, and rufous-crowned sparrows may stay in such open, disturbed habitats for years. The <i>canescens</i> subspecies of <i>Aimophila ruficeps</i> is a resident of southwest California on the slopes of the Transverse and Coastal Ranges from Los Angeles County south to Baja California Norte, Mexico. Diegan coastal sage scrub was mapped in the BASASP area.
Red-crowned parrot (<i>Amazona viridigenalis</i>)	BCC -- --	Potential. The red-crowned parrot is native to Mexico and is currently found in northeastern Mexico, inhabiting lush areas in arid lowlands and foothills, particularly gallery forests, deciduous woodlands, and dry, open, pine-oak woodlands on ridges up to 3,281 feet. These birds are known to inhabit urbanized areas that are present in the BASASP area.
Grasshopper sparrow (<i>Ammodramus savannarum</i>)	-- SSC MSCP Covered	Potential. The grasshopper sparrow is restricted to grasslands and is localized and generally uncommon in San Diego County. Non-native grassland is present within the BASASP area.
Bell's sage sparrow (<i>Artemisiospiza belli belli</i>)	BCC WL --	Potential. The Bell's sage sparrow can be found in chaparral and sage scrub. The habitat must not be too dense or have too much leaf litter. Its distribution throughout San Diego County is patchy, which often shifts to include partially recovered burned areas. Diegan coastal sage scrub is mapped in the BASASP area.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Short-eared owl (<i>Asio flammeus</i>)	BCC -- --	Potential. The breeding range of the short-eared owl in North America includes areas of northern California to central Missouri and north to the Great Lakes area, and all areas to the north. All areas in the United States that lie south of the year-round range are within the wintering (non-breeding) range. Short-eared owls are known to move to follow fluctuations in prey base. May be present in the BASASP area if a large prey base is present.
Burrowing owl (<i>Athene cunicularia</i>)	BCC SSC MSCP Covered	No Potential. In general, burrowing owl habitat is composed of drier, open areas that can include prairies, grasslands, and savannas. The burrowing owl can be found living in deserts, farmlands, pastures, cemeteries, airports, vacant lots, university campuses, golf courses, and other urban areas. Burrowing owls are dependent on the presence of fossorial mammals (primarily prairie dogs and ground squirrels), whose burrows are used for nesting and roosting. Non-native grassland, disturbed habitat, and urban areas have been mapped within the BASASP area; however, the nearest observation of this species is approximately 2.5 miles to the south.
Oak titmouse (<i>Baeolophus inornatus</i>)	BCC -- --	No Potential. Oak titmice live in warm, open, dry oak or oak-pine woodlands. Many use scrub oaks or other brush as long as woodlands are nearby. Occasionally, oak titmice nest in stumps, fence posts, pipes, eaves, holes in riverbanks, or nest boxes. No oak woodlands are mapped in the BASASP area.
Red knot (<i>Calidris canutus ssp. roselaari</i>)	BCC -- --	No Potential. Red knots breed in dry tundra and sparsely vegetated hillsides. Outside of breeding season, they are found in intertidal marine habitats, especially near coastal inlets, estuaries, and bays. The <i>roselaari</i> subspecies winters in coastal western Mexico. Although the species is found where Rose Creek enters the Pacific Ocean, it is unlikely to be seen in the BASASP area as the species does not often travel inland outside of breeding season.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Costa's hummingbird (<i>Calypte costae</i>)	BCC -- --	Potential. Costa's hummingbird frequents desert, semi-desert, arid brushy foothills, and chaparral in migration and winters in adjacent mountains, open meadows, and gardens. It breeds in the southwestern United States, covering the southeastern border of California, southwestern border of Arizona, as well as northwestern Mexico, while wintering on the north half of Mexico's west coast. Arid foothills and gardens are present in the BASASP area.
San Diego cactus wren (<i>Camphylorhynchus brunneicapillus sandiegensis</i>)	BCC SSC MSCP Covered	No Potential. The key element of San Diego cactus wren habitat is thickets of cholla (<i>Opuntia prolifera</i>) or prickly-pear cacti (<i>O. littoralis</i> , <i>O. oricola</i>) tall enough to support and protect the birds' nests (Shuford et al. 2008b). The San Diego cactus wren has a very limited range, extending from extreme northwestern Baja California, Mexico north through the coastal lowlands of San Diego County and into southern Orange County. No large thickets of cactus were mapped in the BASASP area.
Lawrence's goldfinch (<i>Carduelis lawrencei</i>)	BCC -- --	Potential. This species inhabits arid and open woodlands near three features: chaparral or other brushy areas; tall annual weed fields; and a water source such as a stream, small lake, or farm pond. It breeds in California and is a permanent resident of the southern part of the State while also wintering in southern Arizona, southwestern New Mexico, northwestern Mexico, and the northern border of the Baja Peninsula. Most arrive in southern California by early March and depart in fall by late September. Water, non-native vegetation, and riparian woodland are present in the BASASP area.
Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	FE SSC MSCP Covered	No Potential. Inhabits sandy beaches, salt pond levees, and shores of large alkali lakes. This species needs sandy, gravelly, or friable soils for nesting (CDFW 2016a). No beaches with gravelly soils are present in the BASASP area.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Mountain plover (<i>Charadrius montanus</i>)	BCC -- MSCP Covered	No Potential. Mountain plovers are generally found in open, flat, dry tablelands with low, sparse vegetation. Most birds winter from north-central California to the Mexico border, with some birds west of the Coast Range in southern counties. They depart California wintering grounds in March and head to breeding areas in Colorado, Montana, and Wyoming. No open, flat habitat is present in the BASASP area.
Olive-sided flycatcher (<i>Contopus cooperi</i>)	BCC -- --	No Potential. Breeds in montane and northern coniferous forests, at forest edges and openings, such as meadows and ponds. Winters at forest edges and clearings where tall trees or snags are present. The olive-sided flycatcher breeds in the western United States as well as throughout Canada and Alaska, while wintering in southern Mexico and Central America. There are no coniferous forests mapped in the BASASP area.
Southern willow flycatcher (<i>Empidonax traillii extimus</i>)	FE SE MSCP Covered	No Potential. The southwestern willow flycatcher uses well-developed willow riparian forest. Although southern willow scrub is mapped in the BASASP area, the small stand of habitat present is unlikely to support this species.
Peregrine falcon (<i>Falco peregrines anatum</i>)	BCC -- MSCP Covered	Potential. Inhabits areas near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds, and on human-made structures. Rose Creek and human-made structures are present in the BASASP area.
Gull-billed tern (<i>Gelochelidon nilotica</i>)	BCC -- --	Potential. Breeds on gravelly or sandy beaches while wintering in salt marshes, estuaries, lagoons, and plowed fields. On the Pacific coast of the United States, gull-billed terns occur only in southern California where they breed in small numbers along the south coast of San Diego County and on the shores of the Salton Sea, east of San Diego. Salt marsh was mapped adjacent to the BASASP area.
Black oystercatcher (<i>Haematopus bachmani</i>)	BCC -- --	No Potential. The black oystercatcher's habitat includes rocky seacoasts and islands, and less commonly sandy beaches. It breeds along the Pacific coast of North America, from Alaska to Baja California, and winters along the coast of southern California. Most individuals only undergo post-breeding, short-distance migration, and generally remain near nesting areas. The BASASP area does not encompass any beaches or sea coast.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Bald eagle (<i>Haliaeetus leucocephalus</i>)	BCC -- MSCP Covered	No Potential. Bald eagles breed and winter in forested areas adjacent to large bodies of water. Throughout their range, they select large, super-canopy roost trees that are open and accessible. Bald eagles breed throughout much of Canada and Alaska, in addition to scattered sites across the lower 48 states, from California to the southeastern U.S. coast and Florida. Wintering covers most of the contiguous United States, with some year-round distribution in the northwest. Although water is present in the BASASP area (Rose Creek) and trees are present, the forested area and body of water are not large enough to support bald eagles.
Least bittern (<i>Ixobrychus exilis</i>)	-- SSC --	Potential. The least bittern is a colonial nester in marshlands and borders of ponds and reservoirs that provide ample cover. Nests are usually placed low in vegetation, over water. Marsh habitat was mapped in the BASASP area.
Short-billed dowitcher (<i>Limnodromus griseus</i>)	BCC -- --	Potential. Breeds in muskegs of taiga to timberline, and barely onto subarctic tundra. Winters on coastal mud flats and brackish lagoons. In migration prefers saltwater tidal flats, beaches, and salt marshes. They winter along the east and west coasts of the United States. Salt marsh was mapped adjacent to the BASASP area.
Marbled godwit (<i>Limosa fedoa</i>)	BCC -- --	Potential. Breeds in marshes and flooded plains. In migration and winter it is also found on mudflats and beaches. The marbled godwit breeds in Montana, North and South Dakota, to Alberta, Saskatchewan and Manitoba in Canada. Marbled godwits winter along the east and west coasts of the United States and the Gulf of Mexico and are transient elsewhere. Marsh habitat has been mapped in the BASASP area.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Lewis's woodpecker (<i>Melanerpes lewis</i>)	BCC -- --	No Potential. Important habitats for Lewis's woodpeckers include open ponderosa pine forest, open riparian woodland dominated by cottonwood, and logged or burned pine forest. They reuse existing nest holes or natural cavities in trees and do not use newly excavated ones. Lewis's woodpeckers breed from southern British Columbia to Arizona and New Mexico; this range also covers California east to Colorado. They winter from southern British Columbia throughout the southwestern United States. They are migratory within the northern portion of their breeding range, and remain present throughout the year in many portions of their breeding range. The small stands of southern willow scrub and southern riparian forest in the BASASP area are likely not large enough to support this species.
Long-billed curlew (<i>Numenius americanus</i>)	BCC -- MSCP Covered	Potential. Short-grass or mixed prairie habitat with flat to rolling topography is preferred while breeding; tidal estuaries, wet pasture habitats, and sandy beaches are preferred while wintering; and a wide range of habitats used during migration. Wintering range includes coastal and central portions of California, coastal Baja California, Texas' Gulf coast, and much of Mexico. The BASASP area may be used during migration or wintering.
Whimbrel (<i>Numenius phaeopus</i>)	BCC -- --	Potential. Breeds in tundra habitat, from wet lowlands to dry heath. In migration, frequents various coastal and inland habitats, including fields and beaches. Winters in tidal flats and shorelines, occasionally visiting inland habitats. Wintering habitat is present in the BASASP area.
Ashy storm-petrel (<i>Oceanodroma homochroa</i>)	BCC -- --	No Potential. Breeding habitat requires rocky islands among talus slopes. Ashy storm-petrels spend most of their time at sea, and only visit land to court and tend to chicks. No suitable habitat is present in the BASASP area.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Sage thrasher (<i>Oreoscoptes montanus</i>)	BCC -- --	No Potential. The sage thrasher breeds exclusively in shrubsteppe habitats. Expanses of dense sagebrush provide concealment, and bare ground provides foraging opportunities. During migration and winter, they move to grasslands with scattered shrubs and open pinyon-juniper woodlands. It breeds from south central British Columbia, through Washington, Oregon, and California. This range extends east to Nevada, Idaho, Montana, Utah, Colorado, and New Mexico. No shrubsteppe habitat is present in the BASASP area.
Belding's savannah sparrow (<i>Passerculus sandwichensis beldingi</i>)	-- SE MSCP Covered	Potential. Inhabits coastal salt marshes, from Santa Barbara south through San Diego County. Nests in <i>Salicornia</i> sp. on and within the margins of tidal flats (CDFW 2016a). Salt marsh was mapped adjacent to the BASASP area.
Fox sparrow (<i>Passerella iliaca</i>)	BCC -- --	Potential. Breeding occurs primarily in remote areas, and in winter they move into backyard thickets. Fox sparrows breed in coniferous forest and dense mountain scrub. They spend winters in scrubby habitat, forests, and in backyards. Scrubby and urban areas within the BASASP area may be used in winter.
Nuttall's woodpecker (<i>Picoides nuttallii</i>)	BCC -- --	Potential. Found primarily in oak woodlands, but also found in riparian woodlands. Tree nest cavity excavated by males with little assistance from females; male may roost in cavity as it nears completion. Year-round distribution occurs from northern California and southward to northwestern Baja California. This species is likely to be found in the BASASP area within the riparian forest or southern willow scrub.
Green-tailed towhee (<i>Pipilo chlorurus</i>)	BCC -- --	No Potential. Green-tailed towhees live in dense, shrubby habitat, sometimes with scattered trees or cacti, as well as sagebrush shrubsteppe. The shrubby regrowth that appears after certain logging practices, or 8 to 15 years after forest fires, provides good towhee habitat. During winter, they move to dry washes, arroyos, mesquite thickets, oak-juniper woodland, creosote bush, and desert grasslands. Green-tailed towhees breed in the Western United States from California to Colorado, with their range extending north to Montana and south to New Mexico. They winter in Mexico, as well as several southwestern states including California, Nevada, Arizona, New Mexico, and Texas. Appropriate shrubby habitat is not present in the BASASP area.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Coastal California gnatcatcher (<i>Poliioptila californica californica</i>)	FT SSC MSCP Covered	No Potential. The coastal California gnatcatcher is closely associated with coastal sage scrub vegetation, and it utilizes this community for foraging and nesting. The birds remain on their territory throughout the year and expand their home range during non-breeding season. Diegan coastal sage scrub was mapped within the BASASP area; however, it is small, low quality, and unlikely to support the species.
Cassin's auklet (<i>Ptychoramphus aleuticus</i>)	BCC -- --	No Potential. Cassin's auklet can be found feeding in flocks and nesting in colonies from Alaska to Mexico. This species is primarily a sea bird. The BASASP area is too far inland to provide habitat for this species.
Ridgway's rail (<i>Rallus obsoletus</i>)	FE SE MSCP Covered	Potential. This species is found in salt marshes traversed by tidal sloughs, where cordgrass and pickleweed are the dominant vegetation. This species requires dense growth of either pickleweed or cordgrass for nesting or escape cover, where it feeds on mollusks and crustaceans. Salt marsh was mapped adjacent to the BASASP area.
Black skimmer (<i>Rynchops niger</i>)	BCC -- --	No Potential. Black skimmers can be found at open sandy beaches, gravel or shell bars with sparse vegetation, and occasionally at inland lakes. Particularly in the southeastern United States, artificial islands made from dredge spoils are an important nesting habitat for black skimmers. It is almost exclusively a coastal species, with the western population breeding in southern California and Mexico. No beach habitat or inland lakes are present within the BASASP area.
Allen's hummingbird (<i>Selasphorus sasin</i>)	BCC -- --	Potential. Breeds in moist coastal areas, scrub, chaparral, and forests. Winters in forest edge and scrub clearings with flowers. Allen's hummingbirds winter along the Pacific coast of central Mexico. Most are short to medium distance migrants, going between breeding areas along the Pacific coast of California and Oregon. Coastal scrub is present in the BASASP area.
Yellow warbler (<i>Setophaga petechia</i>)	BCC SSC --	Observed. The yellow warbler can be found in riparian woodland, Mojave riparian forest, mule fat scrub, or southern willow scrub in California during its breeding season. It winters in Central America and South America. Riparian woodland and southern willow scrub is mapped in the BASASP area. This species was observed in the Rose Creek corridor in 2014 during surveys for the Rose Creek Bike Path.

Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Birds (cont.)		
Black-chinned sparrow (<i>Spizella atrogularis</i>)	BCC -- --	No Potential. During breeding season, black-chinned sparrows can be found in arid brush lands on rugged mountain slopes. While wintering, resident populations occupy habitat similar to but downslope from breeding areas, with other populations inhabiting desert grasslands. Breeding mostly occurs in California, Baja California, Arizona, and New Mexico, but this range covers small portions of southern Nevada and southwestern Utah. Wintering range covers Baja California Sur and northern Mexico. Populations in central California and Baja California migrate south to Baja California Sur. No rugged mountain slopes are present in the BASASP area.
Brewer's sparrow (<i>Spizella breweri</i>)	BCC -- --	No Potential. Breeding habitat for Brewer's sparrow includes shrublands, sagebrush-dominated landscapes, pinon-juniper woodlands, or coniferous forest. Their winter range includes sagebrush shrublands, and desert dominated by saltbrush and creosote. No suitable habitat has been mapped in the BASASP area.
California least tern (<i>Sternula antillarum browni</i>)	FE SE MSCP Covered	No Potential. The California least tern nests along the coast from San Francisco Bay south to northern Baja California. It is a colonial breeder found on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas. This species is known from Mission Bay but is unlikely to travel inland to the BASASP area.
Lesser yellowlegs (<i>Tringa flavipes</i>)	BCC -- --	Potential. Lesser yellowlegs are common breeders in boreal forest and forest/tundra transition habitats. Wintering habitat includes tidal flats, shallow lagoons, and marshes. Wintering occurs along the coasts of California, Baja California, southeastern United States, and along the Gulf of Mexico, in addition to southeastern Texas and throughout Central America. Wintering habitat is present in the BASASP area.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE SE MSCP Covered	Observed. The least Bell's vireo is found in mature riparian woodland, Mojave riparian forest, mule fat scrub, or southern willow scrub in California and northern Baja California, Mexico during its breeding season. It winters in southern Baja California, Mexico. This species was observed in the Rose Creek corridor in 2014 during surveys for the Rose Creek Bike Path.

**Table 5.3-4 (cont.)
SENSITIVE WILDLIFE SPECIES OBSERVED
OR WITH POTENTIAL TO OCCUR WITHIN THE BASASP AREA**

Species	Sensitivity ¹ Federal State City	Potential to Occur/Preferred Habitat/Range/Records Near the BASASP Area
Mammals		
Pocketed free-tailed bat (<i>Nyctinomops femorosaccus</i>)	-- SSC --	No Potential. This species is found in a variety of arid areas in southern California: pine-juniper woodlands, desert scrub, palm oasis, desert wash, and desert riparian habitats. They prefer rocky areas with high cliffs. No suitable rocky habitat is present in the BASASP area.
Big free-tailed bat (<i>Nyctinomops macrotis</i>)	-- SSC --	No Potential. This bat is found in low-lying arid areas in southern California. This species requires high cliffs or rocky outcrops for roosting sites. It feeds principally on large moths. No rocky outcrops are mapped in the BASASP area.
Pacific pocket mouse (<i>Perognathus longimembris pacificus</i>)	FE SSC --	No Potential. This mouse inhabits the narrow coastal plains from the Mexican border north to El Segundo, Los Angeles County. They prefer soils of fine alluvial sands generally within one mile of the ocean. Only three populations of these species are known. The southernmost population is located on Camp Pendleton. The BASASP area is outside of the known range of the species.

Source: HELIX 2018b

FT = federally listed endangered, FT = federally listed threatened, BCC = bird of conservation concern, SE = state listed endangered, SR = state listed rare, ST = state listed threatened, SSC = state species of special concern, WL = watch list
Shaded cells denote species with potential to occur within the BASASP area.

1 See Appendix C for an explanation of sensitivity codes.

5.3.1.3 Jurisdictional Waters/Wetlands

Agencies with jurisdictional authority over wetlands and other jurisdictional water resources within the BASASP area include the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS) (if listed species are present), CDFW, Regional Water Quality Control Board (RWQCB), and the City. There are five vegetation communities in the BASASP area that are considered potential jurisdictional waters or wetlands (freshwater marsh, southern willow scrub, southern riparian forest, non-native riparian, and streambed). Additionally, the National Wetlands Inventory (USFWS 2014) shows areas mapped as "riverine" and "freshwater forested/shrub wetland." Both wetland types occur within Rose Creek in the western portion of the BASASP area. The USGS topographic map of the BASASP area was also reviewed, and does not show any additional waters not shown in the National Wetlands Inventory. An assessment of wetland and waters resources would need to be made at the project level for all subsequent development proposals. If warranted, a formal jurisdictional delineation would need to be conducted to identify the precise boundaries of these resources to determine the extent of the existing waters/wetlands and to accurately determine if any impacts would occur from any proposed future project pursuant to the proposed BASASP.

5.3.1.4 Wildlife Movement Corridors

Regional wildlife corridors connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife over a large scale and the consequent mixing of genes between populations. Local wildlife corridors allow access to resources such as food, water, and shelter within the framework of an animal's daily routine. Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies.

The BASASP area is almost entirely developed. Rose Creek, located in the western portion of the BASASP area, is surrounded by development to the east and west (refer to Figure 1-2). Rose Creek enters Mission Bay approximately half a mile south of the BASASP area and extends from San Clemente Canyon approximately two miles north of the BASASP area. Although the Rose Canyon Creek corridor does not connect two large bodies of open area, it provides local access to resources for resident or migratory species. The Kendall-Frost Mission Bay Marsh Preserve is located approximately 0.3 miles west of where Rose Creek enters Mission Bay. A beach, approximately 60 to 100 feet wide, 200 feet of which is paved, lies between Rose Creek and the preserve. This network of habitat between the preserve to the southwest, and San Clemente Canyon to the northeast, makes Rose Creek part of a potential movement corridor for migrating birds.

The railroad ROW that runs through the eastern portion of the BASASP area may act as a corridor for wildlife. The railroad ROW is surrounded by low-quality habitat such as disturbed habitat, non-native grassland, and eucalyptus woodland, with some sections of fragmented Diegan coastal sage scrub. It is highly disturbed, with frequent trains passing through the area, and is adjacent to roads and commercial buildings. Despite being low quality, it is a linear arrangement of undeveloped habitat in a highly developed area, which could be used on occasion by some common wildlife species to move between larger patches of habitat, such as Stevenson Canyon or Tecolote Canyon to the east.

5.3.2 Regulatory Framework

5.3.2.1 Federal Regulations

Endangered Species Act

Administered by the USFWS, the federal Endangered Species Act provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the Endangered Species Act.

Section 9(a) of the Endangered Species Act defines take as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

Sections 10(a) and 7 of the federal Endangered Species Act regulate actions that could jeopardize endangered or threatened species. Section 10(a) allows issuance of permits for incidental take of endangered or threatened species. The term "incidental" applies if the taking of a listed species is incidental to and not the purpose of an otherwise lawful activity. A Habitat Conservation Plan (HCP)

demonstrating how the taking would be minimized and what steps taken would ensure the species' survival must be submitted for issuance of Section 10(a) permits. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. A Biological Assessment is required for any major construction activity if it may affect listed species. Take can be authorized via a letter of biological opinion, issued by the USFWS for non-marine related listed species issues. In addition, pursuant to Section 10(a), the City was issued a take permit for its adopted MSCP Subarea Plan.

The USFWS identifies endangered and threatened species critical habitat, which are areas of land considered necessary for endangered or threatened species to recover. The goal is to restore healthy populations of listed species within their native habitat so they can be removed from the threatened/endangered species list. Once an area is designated as critical habitat pursuant to the federal Endangered Species Act, all federal agencies must consult with the USFWS to ensure that any project they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat.

Migratory Bird Treaty Act

All migratory bird species that are native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (FR Doc. 05 5127). The MBTA is generally protective of migratory birds. In common practice, the MBTA is used to place restrictions on disturbance of active bird nests during the nesting season (generally February 15 to August 31). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

The USACE regulates impacts to waters of the U.S. under Section 404 of the Clean Water Act (CWA; 33 U.S.C. 401 et seq.; 33 U.S.C. 1344; U.S.C. 1413; and Department of Defense, Department of the Army, Corps of Engineers 33 CFR Part 323). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. A federal CWA Section 404 Permit would be required for a project to place fill in waters of the U.S. Projects impacting waters of the U.S. could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, etc. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions. A CWA Section 401 Water Quality Certification administered by the RWQCB must be issued prior to issuance of a Section 404 Permit.

5.3.2.2 State Regulations

California Endangered Species Act

The California Endangered Species Act states that all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats threatened with extinction and those experiencing a significant decline, which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved. The CDFW is the agency that oversees the California

Endangered Species Act. The City was issued a take permit for their adopted MSCP Subarea Plan pursuant to Section 2081 of the California Endangered Species Act.

California Fish and Game Code

The California Fish and Game Code (Sections 1600 through 1603) requires a CDFW agreement for projects affecting riparian and wetland habitats through issuance of a Streambed Alteration Agreement.

Raptors (birds of prey) and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW.

In addition, Section 3513 of the California Fish and Game Code states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA or any part of such migratory non-game bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by the CDFW and/or the USFWS.

The classification of Fully Protected was California's initial effort in the 1960s to identify and provide protection to animals that were rare or faced extinction. Most fully protected species have been listed as threatened or endangered species under more recent endangered species laws and regulations. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.

5.3.2.3 City Regulations and Policies

Multiple Species Conservation Program

The City, USFWS, CDFW, and other local jurisdictions joined together in the late 1990s to develop the MSCP, a comprehensive program to preserve a network of habitat and open space in the region and ensure the viability of (generally) upland habitat and species, while still permitting some level of continued development. The City's MSCP Subarea Plan (City 1997a) was prepared pursuant to the outline developed by USFWS and CDFW to meet the requirements of the State Natural Communities Conservation Planning (NCCP) Act of 1992. Adopted by the City in March 1997, the Subarea Plan forms the basis for the MSCP Implementing Agreement which is the contract between the City, USFWS, and CDFW. The Implementing Agreement ensures implementation of the Subarea Plan, and allows the City to issue "take" permits under the federal and State Endangered Species Acts to address impacts at the local level. Under the federal Endangered Species Act, an Incidental Take Permit (ITP) is required when non-federal activities would result in "take" of a threatened or endangered species. A HCP, such as the City's MSCP Subarea Plan, must accompany an application for a federal ITP. In July 1997, USFWS, CDFW, and the City entered into the 50-year MSCP Implementing Agreement, wherein the City received its federal Endangered Species Act Section 10(a) ITP.

Pursuant to its MSCP permit issued pursuant to Section 10(a), the City has incidental “take” authority over 85 rare, threatened, and endangered species including regionally sensitive species that it aims to conserve (i.e., “MSCP Covered Species”). “MSCP Covered” refers to species that are covered by the City’s federal ITP and considered to be adequately protected within the City’s Preserve, the MHPA. Special “Conditions of Coverage” apply to MSCP Covered Species that would be potentially impacted by projects including modifying project design to avoid impacts to Covered Species in the MHPA where feasible. Additionally, all projects must adhere to MSCP Subarea Plan requirements including those for boundary line adjustments (Section 1.1.1), Compatible Land Uses, General Planning Policies/Design Guidelines, and MHPA Land Use Adjacency Guidelines (Sections 1.4.1-1.4.3) as well as general and specific management policies where applicable. Additional state and federal policy, regulations, and permits may also be required for wetlands and species not covered or fully covered under the MSCP.

The presence of undeveloped land in the BASASP area that may support sensitive plant and wildlife species both within and outside the MHPA means the City’s MSCP Subarea Plan and Implementing Agreement are applicable to development within the BASASP area. Further discussion of the MSCP related to the BASASP is provided in the following subsections.

Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City’s MHPA in 1997. The City’s MHPA areas are defined by “hard-line” limits “with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]” (City 1997a) and MSCP Subarea Plan requirements.

The MHPA consists of public and private lands, much of which has been conserved. Conserved lands shown on the SanGIS database include lands that have been set aside for mitigation or purchased for conservation. These lands may be owned by the City (i.e., dedicated lands) or other agencies, may have conservation easements, or may have other restrictions (i.e., per the City’s Municipal Code Environmentally Sensitive Lands Regulations [ESL], etc.) that protect the overall quality of the resources and prohibit development.

In general, 25 percent of a property wholly in the MHPA can be developed. If 25 percent of the site is outside the MHPA, development could be restricted to this area. In addition, development is required to be located in the least sensitive area feasible. Should more than 25 percent development area of a premise containing MHPA ~~Land~~ land be desired, an MHPA boundary line adjustment may be proposed. The City’s MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City’s Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area(s) proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.4.2 of the Final MSCP Plan (City 1997a). All MHPA boundary line adjustments require approval by the Wildlife Agencies and approval from a City discretionary hearing body.

For parcels located outside the MHPA, there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species’ habitat (which are regulated by state and federal agencies) and narrow endemic species.” However, “impacts to

sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance” with the City’s ESL Ordinance, as implemented through compliance with the City’s Biology Guidelines (City 2012).

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP ITP to ensure that MSCP Covered Species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit. The southwest edge of the BASASP area is within, and adjacent to, the MHPA, as shown in Figure 5.3-2, *MHPA Lands and Coastal Zone*.

MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The MHPA Land Use Adjacency Guidelines are intended to be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) and applicable permits during the development review phase of a proposed project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/land development. The MHPA Land Use Adjacency Guidelines can be accessed on the City of San Diego’s MSCP website at:

<https://www.sandiego.gov/sites/default/files/legacy//planning/programs/mscp/pdf/subarea.pdf>

MSCP Subarea Plan: General and Specific Uses, Policies, Guidelines, Directives and Objectives

General—According to Section 1.4.1 of the City’s Subarea Plan (1997a), the following land uses are considered conditionally compatible with the biological objectives of the MSCP and, thus, will be allowed within the City’s MHPA: passive recreation, utility lines and roads in compliance with policies in Section 1.4.2, limited water facilities and other essential public facilities, limited low-density residential uses, brush management (zone 2), and limited agriculture.

Section 1.4.2 lists general planning policies and design guidelines that should be applied in the review and approval of development projects within or adjacent to the MHPA. The following guidelines may be applicable to the BASASP area:

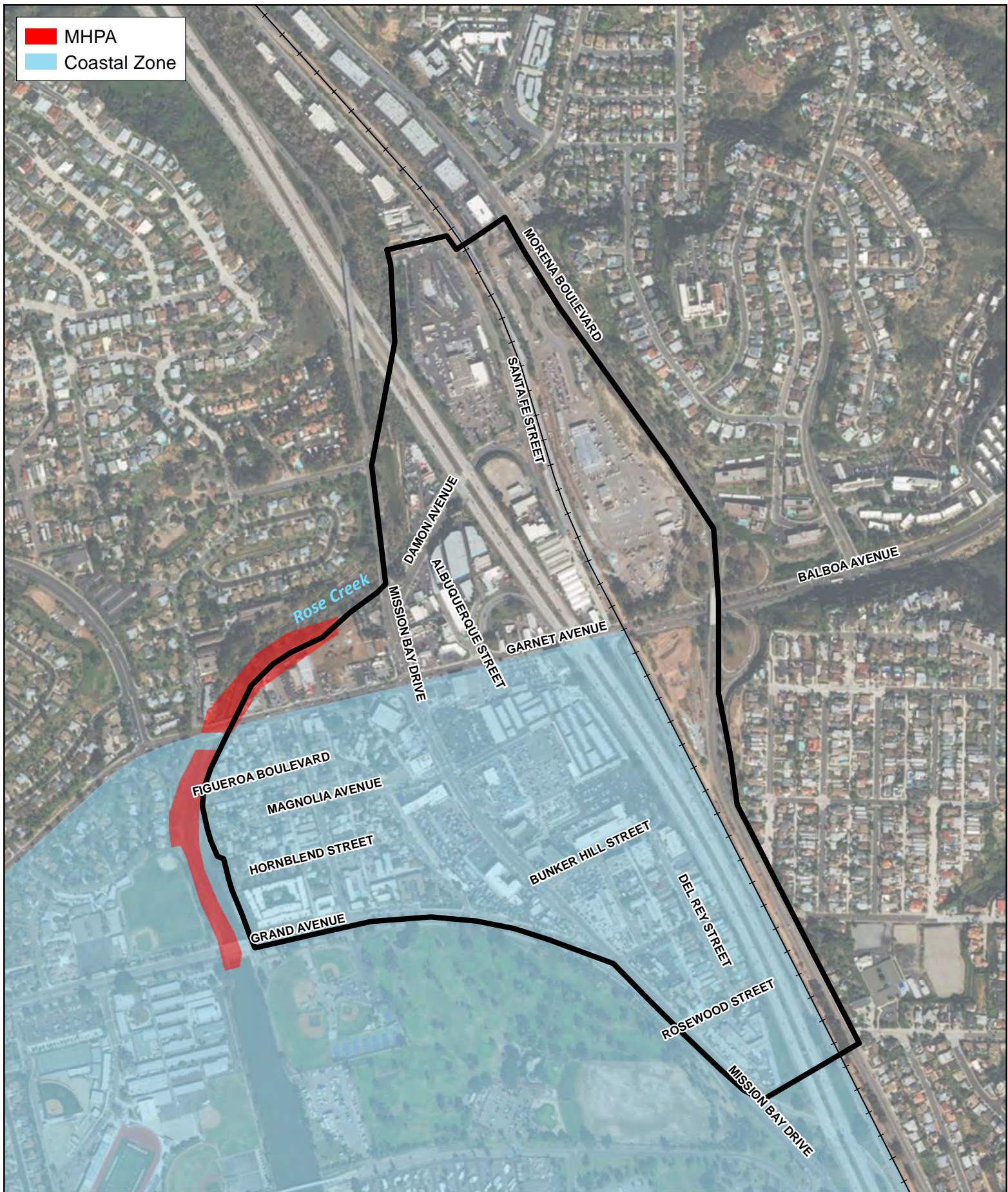
Roads and Utilities—Construction and Maintenance Policies:

1. All proposed utility lines (e.g., sewer, water, etc.) should be designed to avoid or minimize intrusion into the MHPA. These facilities should be routed through developed or developing areas rather than the MHPA, where possible. If no other routing is feasible, then the lines should follow previously existing roads, easements, rights-of-way, and disturbed areas, minimizing habitat fragmentation.
2. All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located, and constructed to minimize environmental impacts. All such activities must avoid disturbing the habitat of MSCP Covered Species, and wetlands. If avoidance is infeasible, mitigation will be required.

3. ~~Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. All such activities must occur on existing agricultural lands or in other disturbed areas rather than in habitat. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion will be required.~~
4. ~~Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Environmental documents and mitigation monitoring and reporting programs covering such development must clearly specify how this will be achieved, and construction plans must contain all the pertinent information and be readily available to crews in the field. Training of construction crews and field workers must be conducted to ensure that all conditions are met. A responsible party must be specified.~~
5. ~~Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.~~
6. ~~Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible of the MHPA in order to minimize impacts and fragmentation of sensitive species and habitat. If roads cross the MHPA, they should provide for fully functional wildlife movement capability. Bridges are the preferred method of providing for movement, although culverts in selected locations may be acceptable. Fencing, grading and plant cover should be provided where needed to protect and shield animals, and guide them away from roads to appropriate crossings.~~
7. ~~Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.~~
8. ~~For the most part, existing roads and utility lines are considered a compatible use within the MHPA and therefore will be maintained. Exceptions may occur where underutilized or duplicative road systems are determined not to be necessary as identified in the Framework Management Section 1.5.~~

Fencing, Lighting, and Signage

1. ~~Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain sensitive species or habitats (e.g., vernal pools).~~
2. ~~Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low sodium or similar lighting. Signage will be limited to access and litter control and educational purposes.~~



Balboa Avenue Station Area Specific Plan

**MHPA Lands
and Coastal Zone**

Figure 5.3-2

Materials Storage

1. Prohibit storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.

Flood Control

1. Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.
2. No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.
3. No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.

Section 1.5.1 sets management goals and objectives that apply throughout the Subarea Plan Area. According to Section 1.5.1, the overarching MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region.

In order to assure that the goal of the MHPA is attained and fulfilled, management objectives for the City's MHPA are as follows:

1. To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.
2. To protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.
3. To enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat.
4. To facilitate monitoring of selected target species, habitats, and linkages in order to ensure long-term persistence of viable populations of priority plant and animal species and to ensure functional habitats and linkages.

5. ~~To provide for flexible management of the preserve that can adapt to changing circumstances to achieve the above objectives.~~

In support of those objectives, Section 1.5.2 of the Subarea Plan provides general management directives that apply throughout the Subarea Plan area. The following directives from Section 1.5.2 may be applicable to the BASASP area:

Public Access, Trails, and Recreation

Priority 1:

1. ~~Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate types of barriers based on location, setting, and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access in order to satisfy mitigation requirements.~~
2. ~~Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.~~
3. ~~In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance, as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood cross joints, edge plantings of native grasses, and mulching of the trail.~~
4. ~~Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley where other agreements have been made, in Mission Trails Regional Park, where appropriate, and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.~~
5. ~~Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300-500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.~~
6. ~~Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except for law enforcement, preserve management, or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.~~

- ~~7. Limit recreational uses to passive uses such as birdwatching, photography, and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.~~
- ~~8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.~~
- ~~9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.~~

~~Litter/Trash and Materials Storage~~

~~Priority 1:~~

- ~~1. Remove litter and trash on a regular basis. Post signage to prevent and report littering in trail and road access areas. Provide and maintain trash cans and bins at trail access points.~~
- ~~2. Impose penalties for littering and dumping. Fines should be sufficient to prevent recurrence and also cover reimbursement of costs to remove and dispose of debris, restore the area if needed, and to pay for enforcement staff time.~~
- ~~3. Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA due to potential leakage.~~
- ~~4. Keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.~~

~~Priority 2:~~

- ~~1. Evaluate areas where dumping recurs for the need for barriers. Provide additional monitoring as needed (possibly by local and recreational groups on a "Neighborhood Watch" type program), and/or enforcement.~~

~~The Subarea Plan also contains several directives for Adjacency Management Issues, such as removal of illegal structures and educating residents about the MHPA, and several directives related to invasive species removal and flood control maintenance.~~

City of San Diego Environmentally Sensitive Lands Regulations

Environmentally Sensitive Lands (ESL) include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2012) as outlined in the City's Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). Impacts to biological resources within and outside the MHPA must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City.

The purpose of the ESL Regulations is to “protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands.” The regulations require that development avoid impacts to certain sensitive biological resources as much as possible including, but not limited to, MHPA lands; wetlands and vernal pools in naturally occurring complexes; federal and State listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values. While a 100-foot buffer width is generally recommended, this width may be increased or decreased on a case-by-case basis in consultation with the CDFW, USACE, and USFWS. Future development proposed in accordance with the proposed BASASP will be required to comply with all applicable ESL Regulations.

The ESL present in the BASASP area include:

- Sensitive biological resources;
- Steep hillsides; and
- Special Flood Hazard Areas.

Biology Guidelines

In September 1991, the City’s Biology Guidelines, part of the Land Development Manual, were adopted, to aid in the implementation and interpretation of the ESL Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 1) and the OR-1-2 Zone (San Diego Municipal Code Chapter 13, Article 1, Division 2). Section III of the Biology Guidelines serve as standards for the determination of impact and mitigation under CEQA and the Coastal Act. The guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL.

Coastal Zone

The southern half of the BASASP area is within the Coastal Zone, which overlaps the BASASP area south of Garnet Avenue from Rose Creek to just east of I-5 (See Figure 5.3-2). Coastal salt marsh is the only native vegetation community within the BASASP area occurring within the Coastal Zone. It comprises a sliver of habitat in the southwest corner of the BASASP area.

Several limitations are put on development in the Coastal Zone including but not limited to:

- Any development in the Coastal Zone requires a ~~Construction~~ Coastal Development Permit (CDP) in addition to a Site Development Permit. Mission Bay, located to the southwest of the BASASP area, is considered a deferred certification area. Any project requiring a CDP in a deferred certification area must apply for the permit through the California Coastal Commission (CCC). Projects requiring a CDP within the BASASP area must obtain a CDP from the City (in those areas covered by the City’s Local Coastal Program [LCP]) or from the CCC, dependent upon the project’s specific location within the BASASP area.

- Wetland buffers should be provided at a minimum 100 feet wide adjacent to all identified wetlands within the Coastal Overlay Zone. The width of the buffer may be either increased or decreased as determined on a case-by-case basis, in consultation with the CDFW, USFWS, and USACE, taking into consideration the type and size of development, the sensitivity of the wetland resources to detrimental edge effects, natural features such as topography, the functions and values of the wetland, and the need for upland transitional habitat. Examples of functional buffers include areas of native or non-invasive landscaping, rock/boulder barriers, berms, walls, fencing, and similar features that reduce indirect impacts on the wetland. Measures to reduce adverse lighting and noise should also be addressed where appropriate. A 100-foot minimum buffer area shall not be reduced when it serves the functions and values of slowing and absorbing flood waters for flood and erosion control, sediment filtration, water purification, and ground water recharge.
- Impacts to wetlands shall be avoided and only those uses identified in the ESL (Chapter 14, Article 3, Division 1) shall be permitted, which are limited to aquaculture, nature study projects or similar resource dependent uses, wetland restoration projects, and incidental public service projects. Such impacts to wetlands shall occur only if they are unavoidable and the least environmentally-damaging feasible alternative, and if adequate mitigation is provided.

~~Before any application for a CDP and Economic Viability Determination² is accepted for processing, the project proponent must provide the following information in relation to the biological resources on the project site:~~

- ~~• Topographic, vegetative, hydrologic, and soils information prepared by a qualified professional, which identifies the extent of the wetlands on the property.~~
- ~~• An analysis of alternatives to the proposed project and an assessment of how the proposed project is the least environmentally damaging alternative. The analysis of alternatives shall include an assessment of how the proposed project will impact all adjacent wetlands and environmentally sensitive habitat areas including those within the overall development plan area.~~

~~Projects in the Coastal Overlay Zone should be the minimum necessary as far as design, location, and size to provide the applicant with an economically viable use of the premises. The project must be the least environmentally damaging alternative and be consistent with all provisions of the certified LCP except for the provision for which the deviation is requested. The findings adopted by the decision-making authority shall identify the evidence supporting the findings.~~

²—The CCC requires that the decision-making authority shall hold a public hearing on any application for an economically viable use determination. Prior to approving a CDP for a use other than one provided for in the coastal conservation district, the decision-making authority shall make the following findings:

- ~~1. Based on the economic information provided by the applicant, as well as any other relevant evidence, each use provided for in the coastal conservation district would not provide an economically viable use of the applicant's property.~~
- ~~2. Restricting the use of the applicant's property to the uses provided for in the coastal conservation district would interfere with the applicant's reasonable investment-backed expectations.~~

City of San Diego General Plan Policies

The City's General Plan presents goals and policies for biological resources in the Conservation Element (City 2008a). Relevant policies are include CE-B.1, CE-B.2, CE-B.4, CE-C.1 through CE-C.4, CE-C.6, CE-D.3, CE-D.4, CE-E.2, CE-E.3 through CE-E.7, CE-G.1 through CE-G.5, CE-H.1 through CE-H.8, and CE-J.1 from the Conservation Element, d in Table 5.3-5, City of San Diego General Plan Policies Relating to Biological Resources.

Table 5.3-5
CITY OF SAN DIEGO GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
CE-B.1	<p>Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.</p> <ul style="list-style-type: none"> a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive land by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
CE-B.2	<p>Apply the appropriate zoning and ESL regulations to limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.</p> <ul style="list-style-type: none"> a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits. b. Limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.
CE-B.4	Limit and control runoff, sedimentation, and erosion both during and after construction activity.
CE-C.1	Protect, preserve, restore and enhance important coastal wetlands and habitat (tide pools, lagoons and marine canyons) for conservation, research, and limited recreational purposes.
CE-C.2	Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans (see also Land Use Element, Policy LU-E-1).
CE-C.3	Minimize alterations of cliffs and shorelines to limit downstream erosion and to ensure that

Table 5.3-5
CITY OF SAN DIEGO GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
	sand flow naturally replenishes beaches.
CE-C.4	Manage wetland areas as described in Section H, Wetlands, for natural flood control and preservation of landforms.
CE-C.6	Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.
CE-D.3	<p>Continue to participate in the development and implementation of watershed management plans.</p> <ul style="list-style-type: none"> a. Control water discharge in a manner that does not reduce reasonable use by others, damage important native habitats and historic resources, or create hazardous conditions (e.g., erosion, sedimentation, flooding and subsidence). c. Improve and maintain drinking water quality and urban runoff water quality through implementation of Source Water Protection Guidelines for New Development. d. Improve and maintain urban runoff water quality through implementation of storm water protection measures (see also Urban Runoff Management, Section E).
CE-D.4	<p>Continue to develop and implement public education programs.</p> <ul style="list-style-type: none"> a. Involve the public in addressing runoff problems associated with development and raising awareness of how an individual's activities contribute to runoff pollution. b. Work with local businesses and developers to provide information and incentives for the implementation of Best Management Practices for pollution prevention and control. c. Implement watershed awareness and water quality educational programs for City staff, community planning groups, the general public, and other appropriate groups.
CE-E.2	<p>Apply water quality protection measures to land development projects early in the process during project design, permitting, construction, and operations in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.</p> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts. g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements in development permit conditions.

Table 5.3-5
CITY OF SAN DIEGO GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
CE-E.3	Require contractors to comply with accepted storm water pollution prevention planning practices for all projects. <ul style="list-style-type: none"> a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction.
CE-E.4	Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.
CE-E.5	Assure that City departments continue to use "Best Practice" procedures so that water quality objectives are routinely implemented. <ul style="list-style-type: none"> a. Incorporate water quality objectives into existing regular safety inspections. b. Follow Best Management Practices and hold training sessions to ensure that employees are familiar with those practices. c. Educate City employees on sources and impacts of pollutants on urban runoff and actions that can be taken to reduce these sources. d. Ensure that contractors used by the City are aware of and implement urban runoff control programs. e. Serve as an example to the community at large.
CE-E.6	Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system. <ul style="list-style-type: none"> a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations. b. Review plans for new development and redevelopment for connections to the storm drain system. c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.
CE-E.7	Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.
CE-G.1	Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability. <ul style="list-style-type: none"> a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within open space.
CE-G.2	Prioritize, fund, acquire, and manage open spaces that preserve important ecological resources and provide habitat connectivity.
CE-G.3	Implement the conservation goals/policies of the City's MSCP Subarea Plan, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.
CE-G.4	Protect important ecological resources when applying floodplain regulations and development guidelines.

Table 5.3-5
CITY OF SAN DIEGO GENERAL PLAN POLICIES RELATING TO BIOLOGICAL RESOURCES

Policy	Description
CE-G.5	Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.
CE-H.1	Use a watershed planning approach to preserve and enhance wetlands.
CE-H.2	Facilitate public-private partnerships that improve private, federal, state, and local coordination through removal of jurisdictional barriers that limit effective wetland management.
CE-H.3	Seek state and federal legislation and funding that support efforts to research, classify, and map wetlands including vernal pools and their functions, and improve restoration and mitigation procedures.
CE-H.4	Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.
CE-H.5	Support research and demonstration projects that use created wetlands to help cleanse urban and storm water runoff, where not detrimental to natural upland and wetland habitats.
CE-H.6	Support educational and technical assistance programs, for both planning and development professionals, and the general public, on wetlands protection in the land use planning and development process.
CE-H.7	Encourage site planning that maximizes the potential biological, historic, hydrological and land use benefits of wetlands.
CE-H.8	Implement a "no net loss" approach to wetlands conservation in accordance with all city, state, and federal regulations.
CE-J.1	Develop, nurture, and protect a sustainable urban/community forest.

Source: City 2008a

Pacific Beach Community Plan

The Pacific Beach Community Plan (City 2005a) applies within the BASASP area, west of I-5. The Pacific Beach Community Plan requires the preservation of water, marine, and biological resources. The Parks and Open Space Element provides recommendations for new development of properties abutting the North Marsh preserve, for rezoning Kate Sessions Park to Open Space Preserve, and for enhancement of the Rose Creek Flood Control Channel. In addition, the Community Plan includes policies for beach and coastal bluff preservation-is required. The Commercial and Residential Elements in the Community Plan include standards for coastal bluff development.

Proposals for open space preservation and resource protection included in the Pacific Beach Community Plan are as follows:

Designate the Rose Creek inlet and flood control channel as open space, and further develop the area adjacent to the floodway as a linear parkway with native riparian landscaping, pedestrian and bicycle paths. Pursue funding sources, such as grants or landscape maintenance districts, to facilitate development and maintenance of this area. Develop and use maintenance standards for the flood control channel that will reconcile the conflicting goals of maintaining the channel to control floods and minimizing disturbance of the natural riparian habitat.

Any public improvement projects adjacent to or within designated open space areas shall be reviewed by the Planning Department through the City Projects Review Task Force for potential

environmental impacts and conformance with the policies and proposals of the Pacific Beach Community Plan.

Placement of new utility infrastructure shall avoid open space areas serving as habitat preserves or conservation. Facilities shall avoid all sensitive habitats, plants, and animals when being located in any open space area and be absolutely excluded from open space sites serving as mitigation and/or serving habitat preservation and conservation purposes. Other open space areas allowing public access and activity would be available for infrastructure with appropriate mitigation. The City shall work with public utilities to ensure their sensitivity to environmental considerations before granting permits for new facilities.

Clairemont Mesa Community Plan

The Clairemont Mesa Community Plan (City 2011a) applies within the BASASP area east of I-5. Objectives for open space and environmental resources listed in the Clairemont Mesa Community Plan include:

1. Preserve and enhance Marian Bear Memorial Park, Tecolote Canyon Natural Park, Stevenson Canyon, and the finger canyons to provide visual open space and community identity.
2. Reduce runoff and the alterations of the natural drainage system.
3. Minimize the contamination of Rose Creek and Tecolote Creek from urban pollutants and erosion.
4. Protect the resource value of canyon areas and plant and animal wildlife within the community.
5. Establish residential development guidelines in areas adjacent to the open space system to prevent the intrusion of incompatible development.
6. Prevent residential landscaping from modifying the biological resources of canyon areas by using plant species that are non-invasive and compatible with the native vegetation.
7. Protect the resource value of artifacts and paleontological remains and the community's heritage for future generations.

5.3.3 Significance Determination Thresholds

Potential impacts to biological resources are assessed through review of the proposed BASASP's consistency with the ESL Regulations, Biology Guidelines, and MSCP Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City's CEQA Significance Determination Thresholds (City 2016a), proceeds in two steps. The first step consists of determining if sensitive biological resources are present. The second step is to determine the potential for direct and indirect impacts to identified sensitive biological resources that would occur as a result of adoption of the proposed BASASP. Based on the City's CEQA Significance

Determination Thresholds (City 2016a), impacts related to biological resources would be significant if the proposed BASASP would:

1. Have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS.
2. Have a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.
3. Have a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.
4. 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.
5. Conflict with the provisions of an adopted HCP, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP Plan area or in the surrounding region.
6. Introduce land use within an area adjacent to the MHPA that would result in adverse edge effects.
7. Conflict with any local policies or ordinances protecting biological resources.
8. Introduce invasive species of plants into a natural open space area.

Pursuant to the City's CEQA Significance Determination Thresholds (City 2016a), existence of any of the following situations associated with the proposed BASASP may indicate the presence of significant biological resources:

- The site has been identified as part of the MHPA by the City's MSCP Subarea Plan;
- The site supports or could support (e.g., in different seasons/rainfall conditions, etc.) Tier I, II, or IIIA & B vegetation communities (such as grassland, chaparral, coastal sage scrub, etc.). The CEQA determination of significant impacts may be based on what was on the site (e.g., if illegal grading or vegetation removal occurred, etc.), as appropriate;
- The site contains, or comes within 100 feet of a natural or manufactured drainage (determine whether it is vegetated with wetland vegetation). The site occurs within the 100-year flood plain established by the Federal Emergency Management Agency (FEMA) or the Flood Plain (FP)/Flood Way (FW) zones; and
- The site does not support a vegetation community identified in Tables 2a, 2b (wetlands) or Table 3 (Tier I, II, IIIA, or IIIB uplands) of the Biology Guidelines; however, wildlife species

listed as threatened or endangered or other protected species may use the site (e.g., wildlife using agricultural land as a wildlife corridor).

For purposes of this analysis, the reference to “site” above is applied to the BASASP area.

Pursuant to the City’s CEQA Significance Determination Thresholds (City 2016a), occurrence of any of the following situations associated with identified biological resources may indicate significant direct and indirect biological impacts.

Direct Impacts

- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.
- Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity of the species and extent of the impacts. Impacts to federal or State listed species and all City Narrow Endemics should be considered significant.
- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

Indirect Impacts

The City’s CEQA Significance Determination Thresholds (City 2016a) indicate that, depending on the circumstances, indirect effects of a project may be as significant as the direct effects of the project. Indirect effects include, but are not limited to, the following impacts:

- Introduction of urban meso-predators into a biological system;
- Introduction of urban runoff into a biological system;
- Introduction of invasive exotic plant species into a biological system;
- Noise and lighting impacts;
- Alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles; and
- Loss of a wetland buffer that includes no environmentally sensitive lands.

5.3.4 Issue 1: Sensitive Species

Would the proposed BASASP result in substantial adverse impacts, either directly or through habitat modifications, to any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the CDFW or USFWS?

5.3.4.1 Impacts

Sensitive Plant Species

Implementation of the proposed project has the potential to impact 13 sensitive plant species known to occur, or programmatically determined to have a potential to occur in the BASASP area (see Table 5.3-3). Precise numbers and locations of sensitive plant species (including any species not listed in Table 5.3-3) would be identified through project-level evaluations and surveys for proposed future development/redevelopment in accordance with the proposed project. The sensitive plant species that could be potentially be impacted by implementation of the proposed project include:

- San Diego ambrosia: This federally listed endangered, CNPS species, MSCP Covered Species, and MSCP Narrow Endemic species has the potential to occur in the BASASP area where Diegan coastal sage scrub and non-native grasslands are present.
- San Diego sagewort: This CNPS species was observed in Rose Creek and also has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- Salt marsh bird's beak: This federally listed endangered, State listed endangered, CNPS species, and MSCP Covered Species has the potential to occur in the BASASP area adjacent to where salt marsh is mapped.
- San Diego sand aster: This CNPS species has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- San Diego button celery: This federally listed endangered, State listed endangered, CNPS species, MSCP Covered Species, and MSCP Narrow Endemic species has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- San Diego barrel cactus: This CNPS species, MSCP Covered Species has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- Beach goldenaster: This CNPS species has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- Southwestern spiny rush: This CNPS species was observed in Rose Creek and has potential to occur in marsh habitats within the BASASP area.
- Sea dahlia: This CNPS species has the potential to occur in the BASASP area adjacent to where Diegan coastal sage scrub is present.
- Coulter's goldfields: This CNPS species has the potential to occur in the BASASP area where salt marsh is present.
- Spreading navarretia: This federally listed threatened, CNPS species, MSCP Covered Species, and MSCP Narrow Endemic species has the potential to occur in the BASASP area where freshwater marsh is mapped.

- Chaparral ragwort: This CNPS species has the potential to occur in the BASASP area where Diegan coastal sage scrub is present.
- Estuary seablite: This CNPS species has the potential to occur in the BASASP area adjacent to where salt marsh is present.

Sensitive Wildlife Species

Implementation of the proposed project has the potential to impact 24 sensitive wildlife species known to occur, or programmatically determined to have a potential to occur in the BASASP area (see Table 5.3-4). Precise numbers and locations of sensitive wildlife species would be identified through project-level evaluations and surveys for proposed future development/redevelopment in accordance with the proposed project. The sensitive wildlife species that could potentially be impacted by implementation of the proposed project include:

- Belding's orange-throated whiptail: This State species of concern and MSCP Covered Species has the potential to occur within the BASASP area within areas mapped as Diegan coastal sage scrub.
- Western grebe: This federally listed Bird of Conservation Concern has potential to occur in the BASASP area within Rose Creek. Implementation of the proposed BASASP would not impact Rose Creek, but indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- California rufous-crowned sparrow: This federally listed Bird of Conservation Concern, State watch list, and MSCP Covered Species has the potential to occur within the BASASP area within areas mapped Diegan coastal sage scrub, including along the railroad ROW and south of Damon Avenue.
- Red-crowned parrot: This federally listed Bird of Conservation Concern is known to inhabit urbanized areas, which comprise much of the BASASP area.
- Grasshopper sparrow: This State species of concern and MSCP Covered Species has potential to occur in the BASASP area where non-native grasslands are present, including within the railroad ROW and adjacent to Rose Creek.
- Bell's sage sparrow: This federally listed Bird of Conservation Concern and State watch list species has the potential to occur within the BASASP area within areas mapped Diegan coastal sage scrub.
- Short-eared owl: This federally listed Bird of Conservation Concern may occur in the BASASP area if a large prey base is present.
- Costa's hummingbird: This federally listed Bird of Conservation Concern may be present in the BASASP within vegetated areas and gardens.
- Lawrence's goldfinch: This federally listed Bird of Conservation Concern has the potential to occur in the BASASP near Rose Creek and within non-native vegetation.

- Peregrine falcon: This federally listed Bird of Conservation Concern and MSCP Covered Species has potential to occur within Rose Creek, but also has been known to nest on man-made structures.
- Gull-billed tern: This federally listed Bird of Conservation Concern has the potential to occur in the BASASP area adjacent to where salt marsh is mapped. No direct impacts are proposed to salt marsh habitat; however, indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Least bittern: This State species of concern has potential to occur in the BASASP area in marsh habitats. No direct impacts are proposed to marsh habitats; however, indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Short-billed dowitcher: This federally listed Bird of Conservation Concern has the potential to occur in the BASASP area adjacent to where salt marsh is mapped. No direct impacts are proposed to salt marsh habitat; however, indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Marbled godwit: This federal Bird of Conservation Concern has potential to occur in the BASASP area in marsh habitats. No direct impacts are proposed to marsh habitats; however, indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Long-billed curlew: This federally listed Bird of Conservation Concern has potential to occur in the BASASP area during migration or wintering.
- Whimbrel: This federally listed Bird of Conservation Concern has potential in the BASASP area because wintering habitat for this species (e.g., tidal flats, shorelines, and inland habitats) is present.
- Belding's savannah sparrow: This State listed endangered and MSCP Covered Species is known to inhabit salt marshes that have been mapped adjacent to the BASASP area. No development is proposed for Rose Creek, which is where all salt marsh is located. Therefore, no direct impacts to this species are expected. However, indirect impacts may occur due to development adjacent to the salt marsh.
- Fox sparrow: This federally listed Bird of Conservation Concern has the potential to occur in the BASASP area during wintering due to presence of scrubby habitat and urban areas.
- Nuttall's woodpecker: This federally listed Bird of Conservation Concern has the potential to occur in the BASASP areas within Rose Creek. Implementation of the proposed BASASP would not impact Rose Creek, but indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Ridgway's Rail: This federally listed endangered, state listed endangered, and MSCP Covered Species has the potential to occur in the BASASP area adjacent to where salt marsh is mapped. No critical habitat for the species is located within the BASASP area. No direct impacts are proposed to salt marsh habitat; however, indirect impacts may occur if development occurs adjacent to potentially occupied Ridgway's rail habitat.

- Allen's hummingbird: This federally listed Bird of Conservation Concern has the potential to occur within the BASASP area within areas mapped as Diegan coastal sage scrub.
- Yellow warbler: This federally listed Bird of Conservation Concern and State species of concern has the potential to occur in the BASASP areas within Rose Creek. Implementation of the proposed project would not impact Rose Creek, but indirect impacts may occur if development occurs adjacent to potentially occupied habitat.
- Lesser yellowlegs: This federal Bird of Conservation Concern has potential in the BASASP area because wintering habitat for this species (e.g., tidal flats and marsh habitats) is present.
- Least Bell's vireo: This federally listed endangered, State listed endangered, and MSCP Covered Species has been observed within the BASASP area within the Rose Creek corridor. Nesting habitat includes southern willow scrub and southern riparian forest. No critical habitat for the species has been designated within or adjacent to the BASASP area. No direct impacts are proposed to least Bell's vireo habitat; however, indirect impacts may occur if development occurs adjacent to potentially occupied habitat.

5.3.4.2 Significance of Impacts

Implementation of the proposed project has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent to sensitive habitat. Potential impacts to federal or State listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List would be significant. Potential impacts to birds covered by the MBTA would be avoided by adherence to the requirements of this law.

5.3.4.3 Mitigation Framework

Impacts to potentially sensitive occurring species would be mitigated in accordance with the City's ESL Regulations, Biology Guidelines, and the provisions of the MSCP Subarea Plan as outlined below in Mitigation Measures BIO-1 through BIO-5.

~~Mitigation Measures BIO-1 through BIO-5 include mitigation that would be implemented on a project-specific basis, as applicable, to reduce impacts to sensitive plant and wildlife species.~~

BIO-1 Sensitive Plants. A qualified biologist shall survey for sensitive plants during the appropriate time of year (i.e., when the species is readily identifiable, such as during its blooming period) prior to initiating construction activities in undeveloped land. If a survey cannot be conducted due to environmental conditions (e.g., inadequate rainfall), then the project proponent shall consult with the City and Wildlife Agencies (where applicable) to determine if construction may begin based on site-specific vegetation mapping and potential to occur analysis and what mitigation would be required, or whether construction must be postponed until spring rare plant survey data are collected.

Adherence to the MSCP Subarea Plan Appendix A (i.e., Conditions of Coverage) and securing comparable habitat at the required ratio(s) (i.e., a habitat-based approach to

mitigation; see Tables 5.3-7 and 5.3-8) shall provide all or a component of mitigation for direct impacts to the most sensitive plant species (e.g., MSCP Covered Species).

Impacts to Narrow Endemic species shall be avoided and minimized to the maximum extent possible. Unavoidable impacts shall be mitigated in accordance with the species-specific requirements in the City's Biology Guidelines and MSCP Subarea Plan.

Impacts to federal or State listed plant species shall first be avoided where feasible, and where not feasible, impacts shall be compensated through salvage and relocation via a transplantation/restoration program and/or off-site acquisition and preservation of habitat containing the plant species at a minimum 1:1 ratio and as required by the City and Wildlife Agencies. A qualified biologist shall prepare a City- and Wildlife Agency-approved Restoration Plan that shall indicate where restoration would take place. The Restoration Plan shall also identify the goals of the restoration, responsible parties, methods of restoration implementation, maintenance and monitoring requirements, final success criteria, contingency measures, and notice of completion requirements.

Impacts to other sensitive plant species (CNPS Rare Plant Rank 1 or 2 species) shall first be avoided where feasible, and where not feasible, mitigated through salvage and relocation via a transplantation/restoration program and/or off-site acquisition and preservation of habitat containing the plant species at a minimum 1:1 ratio and as required by the City. Where reseeded or salvage and relocation are required, the project proponent shall identify a qualified Habitat Restoration Specialist to be approved by the City. The Habitat Restoration Specialist shall prepare and implement a Restoration Plan to be approved by the City for reseeded or salvaging and relocating sensitive plant species.

BIO-2 Ridgway's Rail. Prior to the issuance of construction permits for future projects planned adjacent to Rose Creek within the BASASP area, a habitat assessment shall be completed within suitable habitat for Ridgway's rail. If habitat is determined to be appropriate, protocol surveys shall then be conducted. If the species is determined to occupy a site, indirect impacts shall be mitigated in accordance with the City's Biology Guidelines and MSCP Subarea Plan (see the City's MHPA Land Use Adjacency Guidelines standard mitigation). Direct impacts to the Ridgway's rail are not expected as there will be no impacts to Rose Creek where the Ridgway's rail's potential habitat (salt marsh) is located.

BIO-3 Least Bell's Vireo. Prior to the issuance of construction permits for future projects planned adjacent to Rose Creek within the BASASP area, a habitat assessment shall be completed within suitable habitat for least Bell's vireo. If habitat is determined to be appropriate, protocol surveys shall then be conducted. If the species is determined to occupy a site, indirect impacts shall be mitigated in accordance with the City's Biology Guidelines and MSCP Subarea Plan (see the City's MHPA Land Use Adjacency Guidelines standard mitigation). Direct impacts to the least Bell's vireo are not expected as there will be no impacts to Rose Creek where the least Bell's vireo's potential habitat (southern willow scrub, southern riparian forest) is located.

BIO-4 Nesting Birds. To reduce potentially significant impacts that would interfere with avian nesting within the BASASP area, measures to be incorporated into project-level construction activities shall include the following as applicable:

- In accordance with the noise component of the City's standard MHPA Land Use Adjacency Guidelines, there shall be no clearing, grubbing, grading, or other construction activities during the breeding season for least Bell's vireo (April 10 through July 31) until it can be demonstrated that construction activities would not result in noise levels exceeding 60 A-weighted, time-averaged decibels (dBA Leq) at the edge of their occupied habitat(s).
- Site-specific biological resources surveys (e.g., for the coastal California gnatcatcher, burrowing owl, raptors, etc.) shall be conducted in accordance with latest City Biology Guidelines and Wildlife Agency protocol. Nesting season avoidance and/or pre-grading surveys and mitigation shall also be completed as required to comply with the federal Endangered Species Act, MBTA, California Fish and Game Code, MSCP, and/or ESL Regulations.
- Work near active nests of MSCP Covered or Listed species must include suitable noise abatement measures to ensure construction noise levels at the MHPA boundary would not exceed 60 dBA Leq.

BIO-5 Other Wildlife Species. Site-specific biology surveys shall be conducted to identify any other sensitive or MSCP Covered Species present on each future project in the BASASP area, including but not limited to the species listed in Table 5.3-4. Impacts to most sensitive and MSCP Covered Species will be mitigated by habitat-based mitigation as established by the City's Biology Guidelines, unless a rare circumstance requires additional species-specific mitigation. In that case, the project-level biological survey report would justify why species-specific mitigation is necessary. For MSCP Covered Species, conditions from MSCP Subarea Plan Appendix A will be implemented where applicable.

5.3.4.4 Significance After Mitigation

~~Implementation of actions pursuant to Mitigation Measures BIO-1 through BIO-5, combined with compliance with the City's MSCP and other City and Community Plan policies promoting the preservation of significant resources, would reduce impacts to sensitive species to less than significant for future development. Future development that has the potential to impact sensitive plant or wildlife species would be required to conduct site-specific, biological surveys to determine the presence or absence of sensitive species and to ensure that impacts are avoided or mitigated. Additionally, future development that has the potential to impact migratory birds will be required to conduct pre-construction surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and to ensure that no impacts occur to any nesting birds or their eggs, chicks, or nests. Thus, impacts to sensitive species from implementation of the proposed project would be less than significant.~~

5.3.5 Issue 2: Sensitive Habitats

Would the proposed BASASP result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB habitats as identified in the Biology Guidelines or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

5.3.5.1 Impacts

Implementation of the proposed project could potentially impact up to approximately 1.50 acres of Tier II and Tier IIIB sensitive biological resources (i.e., sensitive upland communities) as identified in Table 5.3-56, *Potential Impacts to Vegetation Communities and Land Cover Types within the BASASP Area*, and on Figure 5.3-3, *Impacts to Vegetation Communities and Land Cover Types*. These impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Direct impacts to wetland communities would be avoided. The determination of exact impacts cannot be made at the programmatic level, but will be made as future development/ redevelopment in accordance with the proposed project occurs.

Implementation of the proposed project would also impact eucalyptus woodland, non-native vegetation, disturbed habitat, and developed land, which are classified as Tier IV, and do not require mitigation.

Table 5.3-56
POTENTIAL IMPACTS TO VEGETATION COMMUNITIES AND LAND COVER TYPES
WITHIN THE BASASP AREA

Vegetation Community/Land Cover Type	Tier*	Existing Acreage in the BASASP Area	Impacts Inside the MHPA (acres)	Impacts Outside the MHPA (acres)	TOTAL (acres)
Wetland Communities					
Freshwater marsh	--	0.33	0	0	0
Southern willow scrub	--	0.22	0	0	0
Southern riparian forest	--	0.49	0	0	0
Non-native riparian	--	0.24	0	0	0
Streambed	--	1.06	0	0	0
Subtotal Wetland	--	2.34	0	0	0
Sensitive Upland Communities					
Diegan coastal sage scrub	Tier II	1.77	0	0.82	0.82
Non-native grassland	Tier IIIB	1.41	0	0.68	0.68
Subtotal Upland		3.18	0	1.50	1.50
Other Uplands					
Eucalyptus woodland	IV	0.71	0	0.22	0.22
Disturbed habitat	IV	15.54	0	9.15	9.15
Developed	IV	189.73	2.00	182.44	184.44
Subtotal Other Upland		205.98	2.00	191.81	193.81
TOTAL		211.50	2.00	193.31	195.31

Source: HELIX 2018b

*Wetland habitats are not assigned a Tier.

5.3.5.2 Significance of Impacts

According to the City's CEQA Significance Determination Thresholds (City 2016a), potential impacts to Diegan coastal sage scrub and non-native grassland communities would be significant because they are identified as Tier II and Tier IIIB habitats, respectively.

5.3.5.3 Mitigation Framework

Impacts to sensitive upland vegetation and wetland habitats from future discretionary development would be mitigated in accordance with the City's Biology Guidelines, as outlined in Mitigation Measures BIO-6 and BIO-7, include mitigation that would be implemented on a project-specific basis, as applicable, to reduce impacts to sensitive habitats.

BIO-6 Upland Habitats: Sensitive upland vegetation communities shall be mitigated through habitat acquisition/preservation, restoration, and/or creation—or a combination thereof. Mitigation for impacts to sensitive upland vegetation would be required in accordance with the ratios in Table 5.3-67, *Mitigation Ratios for Impacts to Upland Vegetation Communities*, per the City's Biology Guidelines. The habitat types that would be impacted by the proposed BASASP and would require mitigation (coastal sage scrub and non-native grasslands) are shown in bold in Table 5.3-76.

Table 5.3-67
MITIGATION RATIOS FOR IMPACTS TO UPLAND VEGETATION COMMUNITIES

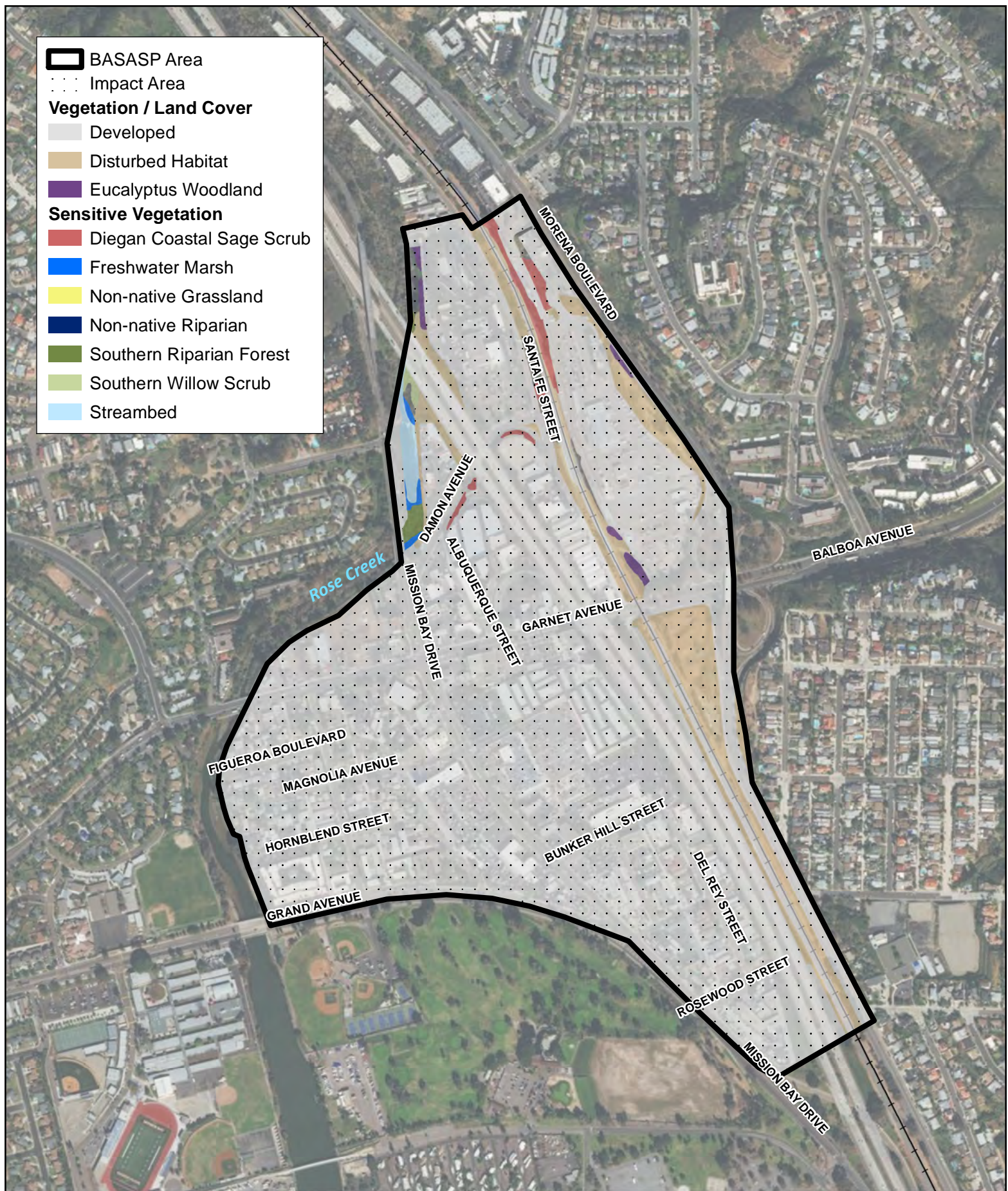
Tier	Habitat Type	Mitigation Ratios			
TIER I (rare uplands)	Southern Foredunes, Torrey Pines Forest, Coastal Bluff Scrub, Maritime Succulent Scrub, Maritime Chaparral Scrub, Oak Chaparral, Native Grassland, Oak Woodlands	Location of Preservation			
		Location of Impact	Inside*	Inside	Outside
			Outside	2:1	3:1
				1:1	2:1
TIER II (uncommon uplands)	Coastal Sage Scrub Coastal Sage Scrub/Chaparral	Location of Preservation			
		Location of Impact	Inside*	Inside	Outside
			Outside	1:1	2:1
				1:1	1.5:1
TIER IIIA (common uplands)	Mixed Chaparral, Chamise Chaparral	Location of Preservation			
		Location of Impact	Inside*	Inside	Outside
			Outside	2:1	3:1
				1:1	2:1
TIER IIIB (common uplands)	Non-Native Grasslands	Location of Preservation			
		Location of Impact	Inside*	Inside	Outside
			Outside	1:1	1.5:1
				0.5:1	1:1

Source: HELIX 2018b

For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind).

For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I–III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

BIO-7 Wetland Habitats: Wetland impacts shall be avoided. If avoidance is infeasible, wetland impacts shall be mitigated to achieve no net loss of wetland function and value. Mitigation for wetland vegetation community impacts usually entails a combination of habitat acquisition/preservation, restoration, and/or creation. Typical mitigation ratios, as defined



Balboa Avenue Station Area Specific Plan

Impacts to Vegetation Communities and Land Cover Types

0 750 1,500
Feet



Figure 5.3-3

in the City's Biology Guidelines, are identified in Table 5.3-78, *City of San Diego Wetland Mitigation Ratios*.

Table 5.3-78
CITY OF SAN DIEGO WETLAND MITIGATION RATIOS

On-Site Habitat Types	Vegetation Community	Mitigation Ratio
With Biologically Superior Design*		
Riparian forest or woodland, riparian scrub, freshwater marsh, natural flood channel, disturbed woodland	Riparian	2:1 to 3:1
Without Biologically Superior Design/Outside of the Coastal Zone		
Freshwater marsh, mule fat scrub, southern willow scrub, southern riparian forest, non-native riparian, tamarisk scrub, streambed	Riparian	4:1 to 6:1

Source: HELIX 2018b

* A Biologically Superior Design includes avoidance, minimization, and compensatory measures, which would result in a net gain in overall function and values of the type of wetland resource over the resources being impacted.

5.3.5.4 Significance After Mitigation

Implementation of ~~actions~~ the City's Environmentally Sensitive Lands Regulations, the City's Biology Guidelines as outlined in pursuant to Mitigation Measures BIO-6 and BIO-7, combined with compliance with the City's MSCP and other City and Community Plan policies promoting the preservation of significant resources, would ~~reduce~~ ensure impacts to sensitive habitat from future development to ~~a~~ would be less than significant level.

5.3.6 Issue 3: Wetlands

Would the proposed BASASP result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pools, riparian areas, etc.) through direct removal, filling, hydrological interruption, or other means?

5.3.6.1 Impacts

There are five vegetation communities in the BASASP area that are potential jurisdictional waters or wetlands, including freshwater marsh, southern willow scrub, southern riparian forest, non-native riparian, and streambed. Additionally, the National Wetlands Inventory shows areas within the BASASP boundaries mapped as "riverine" and "freshwater forested/scrub wetland."

Implementation of the proposed project is not anticipated to result in direct impacts to wetlands regulated by the USACE, CDFW, RWQCB, and/or the City because ~~no~~ areas containing potential jurisdictional waters are proposed to ~~be~~ remain designated as Flood Control/Open Space and as such, no development pursuant to the proposed project would occur in these areas. Future development projects implemented under the proposed project would be reviewed on a project by project basis to determine if impacts to wetlands would occur. If indirect impacts to wetlands would occur, they would be regulated by the USACE according to Section 404 of the Clean Water Act, RWQCB in accordance with Section 401 of the CWA, CDFW under Section 1600 of California Fish and

Game Code, and the City in accordance with the Biology Guidelines, MSCP Subarea Plan, and certified LCP.

5.3.6.2 Significance of Impacts

No direct impacts to wetlands are anticipated to occur because the proposed project does not include development in ~~with implementation of the proposed project because~~ areas containing potential jurisdictional waters ~~would be avoided~~.

5.3.6.3 Mitigation Framework

Potential indirect impacts to wetlands would be regulated in accordance with Sections 401 and 404 of the CWA; Section 1600 of the California Fish and Game Code; and the City's Biology Guidelines, MSCP Subarea Plan, and certified LCP. Though not anticipated, if impacts to wetlands were to occur, Mitigation Measure BIO-7 identified above, as well as Mitigation Measure BIO-~~89~~, shall be implemented.

BIO-~~89~~ Other Jurisdictional Waters: Jurisdictional, non-wetland waters shall be avoided to the extent feasible. Where avoidance is not feasible, mitigation will be applied by federal and State regulators via their applicable consulting/permitting process. ~~The types of mitigation required may include on-site protection, enhancement, creation, and/or restoration. Mitigation is typically required at a 1:1 ratio or higher and is to be accomplished in close proximity to the impacts and usually within the same watershed.~~ The final mitigation requirements and locations for the mitigation are subject to consultation with the permitting agencies.

5.3.6.4 Significance After Mitigation

Though not anticipated, if impacts to wetlands were to occur, implementation of Mitigation Measures BIO-7 and BIO-~~89~~, which requires consultation with the permitting agencies, would reduce them to a less than significant level.

5.3.7 Issue 4: Wildlife Movement

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

5.3.7.1 Impacts

Rose Creek serves as a potential wildlife movement corridor within the BASASP area. The BASASP proposes to designate the portion of Rose Creek within the BASASP area as Open Space with no development occurring within the Rose Creek corridor. Therefore, no impacts to wildlife movement are anticipated.

5.3.7.2 Significance of Impacts

Because no development within Rose Creek is proposed by the BASASP, no impacts to wildlife movement within this wildlife corridor are anticipated.

5.3.7.3 Mitigation Framework

No impacts are anticipated; no mitigation is required.

5.3.7.4 Significance After Mitigation

No impacts would occur.

5.3.8 Issue 5: Conservation Planning

Would the proposed BASASP conflict with the provisions of an adopted HCP or other approved local, regional, or state HCP, either within the MSCP Plan area or in the surrounding region?

5.3.8.1 Impacts

MHPA Consistency

The MHPA occurs along the southwestern edge of the BASASP area, primarily within the Rose Creek channel (see Figure 5.3-2). The MHPA in the southwestern portion of the BASASP area includes developed land north of Garnet Avenue, where development is expected to occur within the BASASP area. While MHPA lands are considered by the City to be a sensitive biological resource, limited development is allowed in the MHPA subject to the requirements of the City's MSCP Subarea Plan (i.e., typically up to 25 percent of a property wholly in the MHPA can be developed and some uses are considered compatible, to be developed or remain so, within the MHPA). In cases where previously developed land has been included within the MHPA, the MHPA Boundary Line Correction process can be used to remove developed land. A MHPA Boundary Line Correction may be considered at a project level in close coordination with the City as well as State and federal wildlife agencies that would allow project activities to occur within areas of the MHPA that are developed or disturbed.

MHPA Land Use Adjacency

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is potential for indirect impacts that may degrade habitat or alter animal behavior within the preserve. These indirect effects may include impacts related to drainage, toxics, lighting, noise, human intrusion, and invasive species. These impacts could be short-term resulting from construction activities or long-term resulting from adjacent, occupied residential development. Short-term construction impacts from noise, for example, could result in disruption of nesting and breeding, and adversely affect a population of sensitive species. Long-term impacts from occupied residences could result from trampling and removal of plant cover due to hiking, biking, and other human activities. To address

these concerns, the MSCP includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project level.

5.3.8.2 Significance of Impacts

MHPA Consistency

The project would generally be consistent with the currently designated MHPA preserve areas. By avoiding impacts to Rose Creek, the project would also avoid impacts to the MHPA, unless impacts occur to those previously developed areas within the MHPA. A MHPA Boundary Line Correction in close coordination with the City as well as state and federal wildlife agencies would allow project activities associated with future specific projects under the proposed BASASP to occur within areas of the MHPA that are developed. Impacts would be less than significant.

MHPA Land Use Adjacency

Implementation of the proposed project may introduce new land uses adjacent to the MHPA. ~~Future development proposals which could result in potentially significant indirect impacts on adjacent MHPA lands. Future discretionary development projects under the proposed project would be subject to the City's MHPA Land Use Adjacency Guidelines, which address requirements for grading and land development, drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. Adherence to these guidelines would avoid any future significant indirect impacts. Thus, implementation of the proposed project would not result in a conflict with the provisions of an adopted HCP or other approved local, regional, or state HCP and impacts would be less than significant.~~

5.3.8.3 Mitigation Framework

MHPA Consistency

Impacts would be less than significant; no mitigation is required.

MHPA Land Use Adjacency

~~Impacts would be less than significant; no mitigation is required. Implementation of the following mitigation measure would reduce potentially significant indirect impacts to the MHPA:~~

~~**BIO-9 Indirect Impacts.** Indirect impacts to sensitive biological resources in the MHPA would be reduced through compliance with the MSCP Subarea Plan Section 1.4.3 Land Use Adjacency Guidelines, which are typically implemented for site-specific projects via inclusion of standard City mitigation measures. The measures would ensure the guidelines listed below are complied with:~~

~~Prior to the issuance of occupancy permits, development areas shall include barriers or be permanently fenced where development is adjacent to the MHPA to deter the intrusion of people and/or pets into the MHPA open space areas. Signage may be installed as an additional deterrent to human intrusion as required by the City.~~

The use of structural and nonstructural BMPs, including sediment catchment devices, shall be required to reduce the potential indirect impacts associated with construction and development to water quality. Drainage shall be directed away from the MHPA or, if not possible, must not drain directly into the MHPA. Instead, runoff flow shall be dissipated and filtered via sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and deemed satisfactory to the City Engineer.

All outdoor lighting adjacent to the MHPA shall be directed away or shielded to prevent light over-spill.

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA (i.e., landscape plans for projects shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA).

All manufactured slopes must be included within the development footprint for the project and outside the MHPA.

All brush management areas shall be shown on the site plan and reviewed and approved by the Environmental Designee of the City. Zone 1 brush management areas must be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation. Vegetation clearing shall be consistent with City standards and shall avoid/minimize impacts to MSCP Covered Species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Access to the MHPA, if any, shall be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the Environmental Designee.

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance shall be provided. Where applicable, this requirement shall be incorporated into leases on publicly owned property as leases come up for renewal.

Uses in or adjacent to the MHPA shall be designed to minimize noise impacts. Berms or walls shall be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures shall also be incorporated for the remainder of the year.

5.3.8.4 Significance After Mitigation

MHPA Consistency

Impacts related to MHPA consistency would be less than significant.

MHPA Land Use Adjacency

~~Through compliance with the MSCP Subarea Plan Section 1.4.3 Land Use Adjacency Guidelines and implementation of Mitigation Measure BIO-9, indirect impacts to the MHPA would be reduced to below a level of significance. Impacts related to MHPA Land Use Adjacency consistency would be less than significant.~~

5.3.9 Issue 6: MHPA Edge Effects

Would the proposed BASASP introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

5.3.9.1 Impacts

The MHPA is surrounded by land designated for residential and commercial uses. Future development that would be adjacent to the MHPA could adversely impact adjacent MHPA from edge effects related to drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development.

5.3.9.2 Significance of Impacts

Future development projects implemented under the proposed project could result in edge effects to MHPA lands that degrade habitat or alter animal behavior within the preserve, which could be significant. Future development proposals located adjacent to the MHPA would be required to address potential indirect impacts through compliance with the City's MHPA Land Use Adjacency Guidelines. Projects adjacent to the MHPA would incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. Adherence to these guidelines would avoid any future significant indirect impacts. Impacts related to adverse edge effects would be less than significant.

5.3.9.3 Mitigation Framework

~~MHPA edge effects would be addressed in accordance with the requirements of the MHPA Land Use Adjacency Guidelines and implementation of Mitigation Measure BIO-9 above. Impacts would be less than significant; no mitigation is required.~~

5.3.9.4 Significance After Mitigation

~~Through compliance with the MSCP Subarea Plan Section 1.4.3 Land Use Adjacency Guidelines and implementation of Mitigation Measure BIO-9, MHPA edge effects would be reduced to below a level of significance. Impacts would be less than significant.~~

5.3.10 Issue 7: Conflict with Local Policies/Ordinances

Would the proposed BASASP conflict with any local policies or ordinances protecting biological resources?

5.3.10.1 Impacts

The City's ESL Regulations require avoidance of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemic species. The regulations also state that wetland impacts should be avoided and unavoidable impacts should be minimized to the maximum extent practicable. Future development proposed in accordance with the proposed project will be required to comply with all applicable ESL Regulations.

5.3.10.2 Significance of Impacts

~~Since future~~ Future development in the BASASP area will be required to comply with all applicable ESL Regulations, ~~on a project-specific basis, implemented as mitigation measures, as appropriate, no conflicts with those regulations would occur. Impacts related to conflicts with the City's ESL Regulations would be less than significant.~~

5.3.10.3 Mitigation Framework

~~Project-specific biological analysis will be conducted for future development proposals to determine whether mitigation is required to assure compliance with ESL Regulations, and which of the mitigation measures listed above apply to each project. Impacts would be less than significant; no additional mitigation is required.~~

5.3.10.4 Significance After Mitigation

Future development would be required to comply with ESL Regulations. Thus, a significant conflict with these regulations would not occur as future development occurs within the BASASP area. Therefore, impacts would be less than significant.

5.3.11 Issue 8: Introduction of Invasive Species

Would the proposed BASASP introduce invasive species of plants into a natural open space area?

5.3.11.1 Impacts

Future development projects within or adjacent to the MHPA or adjacent Rose Creek have the potential to introduce invasive species through the use of exotic/invasive plant species in landscaping.

5.3.11.2 Significance of Impacts

Future development could result in the introduction of invasive species into the MHPA or Rose Creek, impacts of which could be significant.

5.3.11.3 Mitigation Framework

The introduction of invasive species would be addressed in accordance with the requirements of the MHPA Land Use Adjacency Guidelines. ~~No additional mitigation is required, as well as implementation of Mitigation Measure BIO-9, which (among other things), states, "No invasive non-native plant species shall be introduced into areas adjacent to the MHPA (i.e., landscape plans for projects shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA)."~~

5.3.11.4 Significance After Mitigation

By meeting the requirements of the MHPA Land Use Adjacency Guidelines, ~~and using native, non-exotic non-invasive plant species in landscaping pursuant to Mitigation Measure BIO-9,~~ impacts from the introduction of invasive species associated with future development would be less than significant.

5.4 Energy Conservation

The analysis of energy conservation consists of a summary of the energy regulatory framework, the existing conditions within the BASASP area, a discussion of the BASASP's potential impacts on energy resources, and identification of the BASASP design features/policy framework or mitigation measures that may reduce energy consumption. This section evaluates potential impacts to energy conservation in accordance with Appendix F of the CEQA Guidelines and federal, state, and regional regulations.

5.4.1 Existing Conditions

SDG&E provides electricity and natural gas to the BASASP area. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California's utilities' customers have safe and reliable utility service at reasonable rates. It also sets the gas and electricity rates for SDG&E.

Table 5.4-1, *SDG&E 2016 Power Mix*, lists SDG&E's energy sources. As shown, SDG&E used biomass, solar, and wind sources, and obtained 43 percent of its energy from renewable resources in 2016 (SDG&E 2018). As directed by the California Renewables Portfolio Standard in SB 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33 percent renewable energy mix by 2020.

**Table 5.4-1
SDG&E 2016 POWER MIX**

Energy Source	Power Mix (%)
Renewables	43
Biomass	1
Solar	21
Wind	21
Natural Gas and Unspecified	57

Source: SDG&E 2018

SDG&E supplies customers with electricity generated both locally and outside of the utility's service territory, with local facilities currently capable of generating a total of approximately 3,100 megawatts (MW) of power. SDG&E owns and contracts with generation facilities both within and outside its service territory, and power is also produced in local facilities that are non-utility owned. Local generation is important for local power supply needs due to the voltage support it provides that keeps the electric system running smoothly.

5.4.2 Regulatory Framework

The following regulations and guidelines provide the framework for energy conservation. According to the majority of these programs and their requirements, the increased and growing demands for non-renewable energy supplies are best addressed through conservation.

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Energy (DOE), and the U.S. Environmental Protection Agency (USEPA) are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through the establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements.

On the state level, the CPUC and the California Energy Commission (CEC) are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, has permitting authority, and adopts and enforces appliance and building energy efficiency standards.

5.4.2.1 Federal

Federal Energy Policy and Conservation Act and Amendments

Minimum standards of energy efficiency for many major appliances were established by the U.S. Congress in the federal Energy Policy and Conservation Act (EPCA) of 1975, and have been subsequently amended by succeeding energy legislation, including the federal Energy Policy Act of 2005. The DOE is required to set appliance efficiency standards at levels that achieve the maximum improvement in energy efficiency and that are technologically feasible and economically justified.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 established new standards for a few equipment types not already subjected to a standard and it also updated some existing standards. The Energy Independence and Security Act includes new standards for general service lighting, which are being deployed in two phases. First, between 2012 to 2014 (phased over several years), common light bulbs were required to use about 20 to 30 percent less energy than previous incandescent bulbs. Second, by 2020, light bulbs must consume 60 percent less energy than the light bulbs used at the time the law was enacted; this requirement will effectively phase out the incandescent light bulb.

5.4.2.2 State

California Code of Regulations Title 24, Part 6 California Energy Code

All new construction in California must meet Title 24 energy standards (CEC 2015). Title 24, which provides energy efficiency standards for residential and nonresidential buildings, was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to incorporate new energy efficiency technologies and methods. For example, the current Title 24 standards achieve a minimum 15 percent reduction in combined space heating, cooling, and water heating energy compared to the previous 2005 Title 24 energy standards.

Title 24 of the California Code of Regulations (CCR) comprises the State Building Standards Code. Part 6 of Title 24 is the California Energy Code, which includes the building energy efficiency standards. The standards include provisions applicable to all new buildings, residential and non-residential, describing requirements for documentation and certification that the building meets the standards. These provisions include mandatory requirements for the efficiency and design of the following types of systems, equipment, and appliances:

- Air conditioning systems
- Heat pumps
- Water chillers
- Gas- and oil-fired boilers
- Cooling equipment
- Water heaters and equipment
- Pool and spa heaters and equipment
- Insulation and cool roofs
- Lighting and control devices
- Windows and exterior doors
- Joints and other building structure openings ("envelope")
- Gas-fired equipment including furnaces and stoves/ovens

California Code of Regulations Title 24, Part 11 California Green Building Code

The California Green Building Standards Code (CALGreen) was added to Title 24 as Part 11 in 2009, and became effective on January 1, 2011. CALGreen institutes mandatory minimum environmental performance standards which include the same energy efficiency requirements as Part 6 of Title 24, with optional Tier I and II standards for even greater energy efficiency. CALGreen also mandates a 20 percent reduction in indoor water use, with voluntary goals and incentives for projects achieving a reduction of 30 percent and over. Because the provision of water involves large amounts of energy consumption, reduced water consumption would result in reduced energy demand.

California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. To further this policy, the Plan identifies a number of strategies, including providing assistance to public agencies and fleet operators.

Senate Bill 454 (Pavley) – Energy Efficiency Standards

SB 454 was adopted on October 8, 2011, and authorizes the CEC to establish an administrative enforcement process for energy efficiency standards for appliances. California's appliance energy efficiency standards represent a state resource for accomplishing increased energy efficiency in appliances. These standards are recognized as leading the nation in energy savings and serving as one of the primary energy policy tools that has resulted in California's per capita energy use remaining essentially constant over the past 30 years. Per capita energy use for rest of the United States increased by 50 percent over the same time period.

5.4.2.3 Regional

SANDAG 2009 San Diego Regional Energy Strategy

The Regional Energy Strategy (RES) is an important and integral part of the larger San Diego Regional Comprehensive Plan, intended to contain an integrated set of public policies, strategies, and action plans to promote smarter, more sustainable growth for the San Diego region. The following goals set forth by the RES are relevant to the proposed BASASP:

- Energy Efficiency and Conservation
 - GOAL: Reduce per capita electricity consumption in the residential and commercial sectors by 20 percent by 2030 in order to keep total electricity consumption flat between now and 2030.
- Renewable Energy
 - GOAL: Support the development of renewable energy resources to meet or exceed a 33 percent renewable portfolio standard (RPS) by 2020 and a 45 percent RPS by 2030.
- Distributed Generation
 - GOAL: Increase the total amount of clean distributed generation (renewable and non-renewable) to reduce peak demand and diversify electricity resources in the San Diego region.
- Energy and Water
 - GOAL: Reduce water-related energy use.
- Peak Demand
 - GOAL: Implement cost-effective steps and incentives to utilize demand response and energy efficiency measures to reduce peak demand.
- Transportation Fuels
 - GOAL: Substantially increase the deployment of alternative transportation fuels and vehicles.

SDG&E Long-Term Procurement Plan

As required by the CPUC, utility companies such as SDG&E must prepare Long-Term Procurement Plans (LTPPs) to ensure that adequate energy supplies are available to maintain a reserve margin of 15 percent above the estimated energy demand. These plans outline future energy needs and how those needs can be met. In December 2006, SDG&E filed its LTPP with the CPUC, which included a 10-year energy resource plan that details its expected portfolio of energy resources over the period of 2007 through 2016. The projections included in the current LTPP were based on the CEC's California Energy Demand (CED) 2008-2018 Forecast, dated November 2007. The 2016-2026 CEC CED projections are now lower than what was anticipated in 2007.

5.4.2.4 City of San Diego

City of San Diego General Plan

Policies contained in the Conservation Element of the General Plan are applicable to energy use within the BASASP area, as they focus on reducing the City's carbon footprint. Measures to reduce carbon emissions involve reducing vehicular trips through efficient land use and alternative modes of transportation, and maximizing energy efficiency through sustainable building design.

Climate Action Plan

The City adopted a Climate Action Plan (CAP) in December 2015 (City 2015a). The CAP quantifies greenhouse gas (GHG) emissions, establishes Citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives that the City can use to reduce GHG emissions. Many of these goals and actions would have the effect of reducing energy use.

5.4.3 Significance Determination Thresholds

Section 15126.4(a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy.

CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding potential energy impacts of projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. In 2009, the Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks the inclusion of information in the EIR to the extent relative and applicable to the project.

Consistent with Section 15126.4(a)(1) of the CEQA Guidelines, Appendix F, impacts to energy resources would be significant if implementation of the proposed BASASP would:

1. Result in the use of excessive amounts of electric power, fuel, or other forms of energy (e.g., natural gas, oil) during its construction or long-term operation.

5.4.4 Issue 1: Energy

Would the proposed BASASP result in the use of excessive amounts of electric power, fuel, or other forms of energy (e.g., natural gas, oil)?

5.4.4.1 Impacts

Because the proposed project is the adoption of a Specific Plan and does not specifically address any particular development project(s), impacts to energy resources are addressed generally, based on projected buildout of the proposed project. Implementation of the proposed project has the potential to result in impacts to energy supply due to the development that is anticipated to occur in response to projected population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the proposed project would be required to meet the mandatory energy standards of the current California Energy Code (Title 24, Part 6 of the CCR).

Energy resources would be consumed during construction of future development under the proposed project. Energy also would be consumed to provide operational lighting, heating, cooling, and transportation for future development.

Construction-Related Energy Consumption

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type.

Even though the exact details of the projects implemented in accordance with the proposed project are not known at this time, there are no known conditions in the BASASP area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development pursuant to the proposed project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects.

Long-Term Operational-Related Energy Consumption

CalEEMod was used to estimate residential and non-residential energy uses, basing consumption on the number of residential units and non-residential square footage expected with buildout in accordance with the proposed project. Table 5.4-2, *Estimated Energy Consumption*, shows the estimated energy consumption in terms of natural gas and electricity, compared to the existing condition and adopted Pacific Beach and Clairemont Mesa Community Plans. As would be expected, buildout of the proposed project would result in more natural gas and electricity consumption when compared to the existing condition and adopted Community Plans due to the increased density of development.

**Table 5.4-2
ESTIMATED ENERGY CONSUMPTION**

Condition	Natural Gas (annual kBTU)	Electricity (annual kWh)
Existing	24,495,064	13,708,080
Adopted Community Plans	32,536,234	18,491,273
BASASP	72,494,631	33,874,932

Source: HELIX 2018c

kBTU = thousand British thermal units and kWh = kilowatt hour

At a minimum, future development under the proposed project would be required to meet the mandatory energy standards of CALGreen and the California Energy Code (Title 24, Part 6 of the CCR) current at the time of development. Some efficiencies associated with the Energy Standards under Title 24 include the building heating, ventilating, and air conditioning (HVAC) mechanical system, water heating system, and lighting system. Additionally, rebate and incentive programs that promote the installation and use of energy efficient plug-in appliances and lighting ~~would~~ may be available, but not covered under Title 24.

~~Future development would be required to comply with~~ The BASASP Conservation Chapter, which contains goals and policies pertaining to sustainable development that focus on designing new development energy efficient features, including:

- Conservation Goal: Encourage private and public development and improvements that help reduce per capita GHG emissions, support active transportation and transit use, and support the local economy.
- Conservation Goal: Promote sustainable development, building practices, and landscapes that reduce dependence on non-renewable energy sources and natural resources.
- Policy 7.1.6: Ensure that development is consistent with General Plan and Community Plan sustainability policies and supports implementation of the CAP.
- Policy 7.1.7: Improve energy and water conservation in the operation and design of existing and new public facilities and public landscaping areas.
- Policy 7.1.8: Encourage the implementation of energy- and water-efficient measures for commercial uses that exceed California Code, such as energy-efficient and water-efficient machinery for laundry operations; energy-efficient and water-efficient kitchens in restaurants; and storefront shading.

Although these policies would encourage a reduction in ~~decrease~~ the overall per capita energy use in the BASASP area, they would not ensure that energy supplies would be available when needed. Future projects would be subject to review for measures that would further reduce energy consumption in conformance to existing regulations.

Future operational energy use related to roadways would consist of the transportation fuels consumed to transport the BASASP area's residents, workers, and visitors. The total daily vehicle

trips at full buildout are estimated to be 55,625 as detailed in the traffic impact study prepared for the proposed project (Kimley-Horn 2017). The BASASP Mobility Chapter contains policies that would seek to reduce vehicle miles traveled (VMT) and associated fuel consumption. These include policies to improve access to transit facilities, improve walkability, expand and enhance bicycle facilities, and implement multi-modal improvements along streets.

5.4.4.2 Significance of Impact

Implementation of the proposed project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the project. Thus, short-term energy impacts would be less than significant.

Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the proposed BASASP would avoid excessive energy consumption from operations associated with future development. Similarly, policies that seek to reduce VMT during the operation of future development in the BASASP area would ~~avoid excessive~~ encourage a reduction in energy consumption related to transportation. Thus, long-term operational energy impacts would be less than significant.

5.4.4.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.4.4.4 Significance After Mitigation

Impacts related to energy consumption would be less than significant.

5.5 Geology and Soils

This section describes the existing geologic and soils conditions and related hazards within the BASASP area, identifies regulatory requirements and industry standards associated with geologic and soils issues, and evaluates potential impacts and mitigation measures (as applicable) related to implementation of the proposed project.

A geotechnical study was prepared for the proposed project by Allied Geotechnical Engineers, Inc. (AGE 2018). This investigation encompasses the entire BASASP area and is summarized below along with other applicable information. The complete geotechnical study is included as Appendix D of this PEIR.

5.5.1 Existing Conditions

5.5.1.1 Geologic Setting

Geology/Topography

The BASASP area is located in the Peninsular Ranges geomorphic province, which is a north-south oriented mountain range extending from the southern edge of the Los Angeles Basin into Baja California. Basement rocks of the Peninsular Ranges province include Cretaceous crystalline rocks of the Southern California Batholith and Jurassic metasedimentary and metavolcanic rocks of the Santiago Peak Volcanics.

The BASASP area is within the western portion of the San Diego Embayment. The San Diego Embayment is a deep basin filled with flat-lying to gently southwest dipping marine and non-marine sedimentary formations ranging from Cretaceous to Holocene in age. The sedimentary-filled basin is underlain at depth by the basement rock complex.

Topographically, the BASASP area has varying elevations from a low of approximately 10 feet AMSL in the west to a high of approximately 160 feet AMSL in the east. The majority of the BASASP area is relatively level; the eastern portion consists of hills that generally ascend toward Clairemont Mesa to the east.

Stratigraphy

Geologic and surficial units within and adjacent to the BASASP area include: fill materials; young alluvial deposits, young colluvial deposits, old alluvial deposits, old paralic deposits, San Diego Formation, Scripps Formation, Ardath Shale, and Mount Soledad Formation. These units are described below in order of increasing age and their locations within the BASASP area are depicted on Figure 5.5-1, *Geologic Map*.

As previously noted, bedrock units assumed to underlie the BASASP area and vicinity at depth include the Southern California Batholith and Santiago Peak Volcanics. Because these units are not exposed within or adjacent to the BASASP area and are not anticipated to occur in near-surface zones, they are not shown on Figure 5.5-1 or discussed further in this section.

Fill Materials

Fill materials are present in much of the BASASP area in association with the dredging of Mission Bay to create Mission Bay Park. These materials consist of dark gray, fine-grained, micaceous, poorly graded sand with silt containing appreciable amounts of granulated seashells.

Young Alluvial Deposits

Young alluvial deposits of Holocene age are found along the valley floor of Rose Canyon. The deposits are poorly consolidated, poorly sorted permeable floodplain deposits consisting of sand and gravel with interbedded soft to firm silt and clay.

Young Colluvial Deposits

Young colluvial deposits of Holocene and late Pleistocene age are found above the east bank of Rose Creek. These deposits consist of brownish-yellow, fine-grained silty sand and clayey sand with traces of sub-rounded to sub-angular gravel to 1-inch in maximum dimension. The deposits were found to be wet, with a loose to dense consistency.

Old Alluvial Deposits

Old alluvial deposits of late to middle Pleistocene age are found above the east bank of Rose Creek in the northern portion of the BASASP area. The deposits are moderately well consolidated, poorly sorted, and permeable gravel, sand, silt, and clay of fluvial origin that is commonly dissected.

Old Paralic Deposits

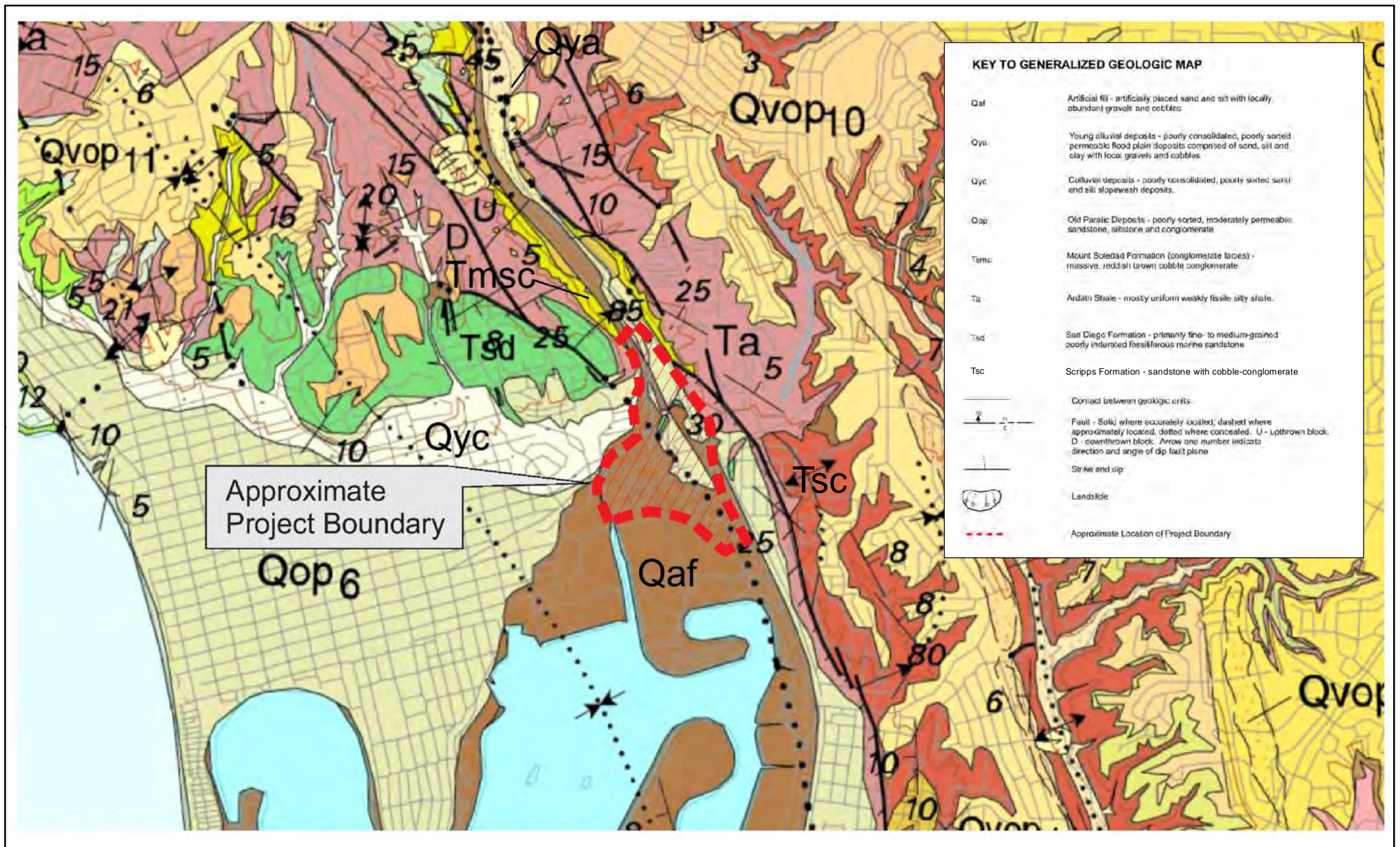
Portions of the BASASP area are underlain by old paralic deposits of late to middle Pleistocene age, and are also referred to as the Bay Point Formation (Kennedy & Tan 2005; Kennedy 1975). The formation consists of poorly consolidated fine to medium grained pale to reddish brown sandstone that is marine and non-marine, locally fossiliferous, sandy, and friable. It is readily excavated with conventional construction equipment.

San Diego Formation

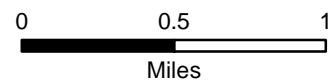
The San Diego Formation, found in two separate areas in the southeast and northwest portions of the BASASP area, is of mid to late Pliocene. It consists of a light yellowish brown, friable, fine-grained marine sandstone with some calcium carbonate-cemented zones and fossiliferous beds. The sandstone may also contain localized zones of cobble-conglomerate, and thin beds of bentonite, marl, and brown mudstone.

Scripps Formation

The Scripps Formation, found on the mid to upper hillside area on the east side of Rose Canyon, South of Balboa Avenue, is of middle Eocene age sandstone with occasional cobble-conglomerate interbeds (Kennedy 1975). The combination of local cobble-conglomerate zones and strong cementation pose difficult excavation conditions even for heavy-duty construction equipment.



Balboa Avenue Station Area Specific Plan



Geologic Map

Figure 5.5-1

Ardath Shale

Ardath Shale, found along a portion of the eastern edge of the BASASP area, is lower to middle Eocene in age and generally consists of a yellowish brown sandy siltstone. The formation contains local concreted slopes and expansive claystone, which may pose landslide risks and slope stability issues.

Mount Soledad Formation

The Mount Soledad Formation, found along portions of the northern edge of the project boundary, is of Eocene age and is exposed on the lower east and west walls of Rose Canyon, and near Rose Creek (AGE 2016). It is a massive, reddish-brown cobble conglomerate and light brown, medium-grained sandstone formation that is the basal unit of the La Jolla Group. The Mount Soledad Formation overlies the Cabrillo Formation, and may pose difficult excavation conditions due to the locally abundant gravels and cobbles.

Groundwater

Groundwater in the BASASP area and vicinity occurs at a depth between 2 and 24 feet below ground surface (bgs).

5.5.1.2 Geologic Hazards

Based on field reconnaissance and review of published and other available information, including the City Seismic Safety Study (City 2008d), the BASASP geotechnical study (AGE 2018) provides an overview of the potential geologic hazards within the BASASP area. Potential hazards are outlined below and shown on Figure 5.5-2, *Geologic Hazards Map*.

Faulting and Seismicity

The BASASP area is located within a broad, seismically active region characterized by a series of northwest-trending, predominantly right-slip faults that span the Peninsular Ranges and extend offshore into the California Continental Province west of California and northern Baja. Within the San Diego region, this zone extends from the San Clemente fault zone, located approximately 50 miles to the west, to the San Andreas fault located about 90 miles to the east (Figure 5.5-3, *Regional Fault Map*). Major active regional faults include the Coronado Bank, San Diego Trough, San Clemente, and Newport-Inglewood fault zones, which are located offshore. The active Rose Canyon Fault Zone (RCFZ) runs parallel to I-5 and across the BASASP area. Several known strands of the RCFZ traverse the BASASP area and have been classified as active faults and thus, are included in Alquist-Priolo Special Studies Zones. Active faults are defined as those exhibiting historic seismicity or displacement of Holocene (less than approximately 11,000 years old) materials, while potentially active faults have no historic seismicity and displace Pleistocene (between approximately 11,000 and 2 million years old) but not Holocene strata. The eastern portion of the BASASP area (east of Mission Bay Drive) is located within the Alquist-Priolo Special Studies Fault Zone 11, which is considered an active fault zone. Major active faults located within approximately 50 miles of the site are identified in Table 5.5-1, *Summary of Potential Seismic Sources*. The RCFZ is considered the dominant source of seismic-related hazards in the BASASP area.

**Table 5.5-1
SUMMARY OF POTENTIAL SEISMIC SOURCES**

Fault Zone	Distance from Site (miles)	Direction from Site	Maximum Earthquake Magnitude	Estimated Peak Ground Acceleration (g)¹
Rose Canyon	0	--	6.8	0.545
Coronado Bank	13.4	S	7.5	0.250
Newport Inglewood (offshore)	27.3	NW	7.2	0.093
Elsinore (Julian)	38.1	NE	7.7	0.075
Elsinore (Temecula)	41.1	NE	7.7	0.057
Elsinore (Earthquake Valley)	44.9	NE	6.9	0.042
San Clemente	47.7	W	7.5	

Source: AGE 2018

¹ Maximum on-site peak horizontal ground acceleration, where g equals the acceleration due to gravity.

S = south; NW = northwest; NE = northeast; W = west

Liquefaction

Seismic-induced soil liquefaction is a phenomenon during which loose, saturated granular materials undergo matrix rearrangement, develop high pore water pressure, and lose shear strength due to cyclic ground vibrations induced by earthquakes. Manifestations of soil liquefaction can include loss of bearing capacity below foundations, surface settlements and tilting in level ground, and instabilities in areas of sloping ground. Soil liquefaction can also result in increased lateral and uplift pressures on buried structures.

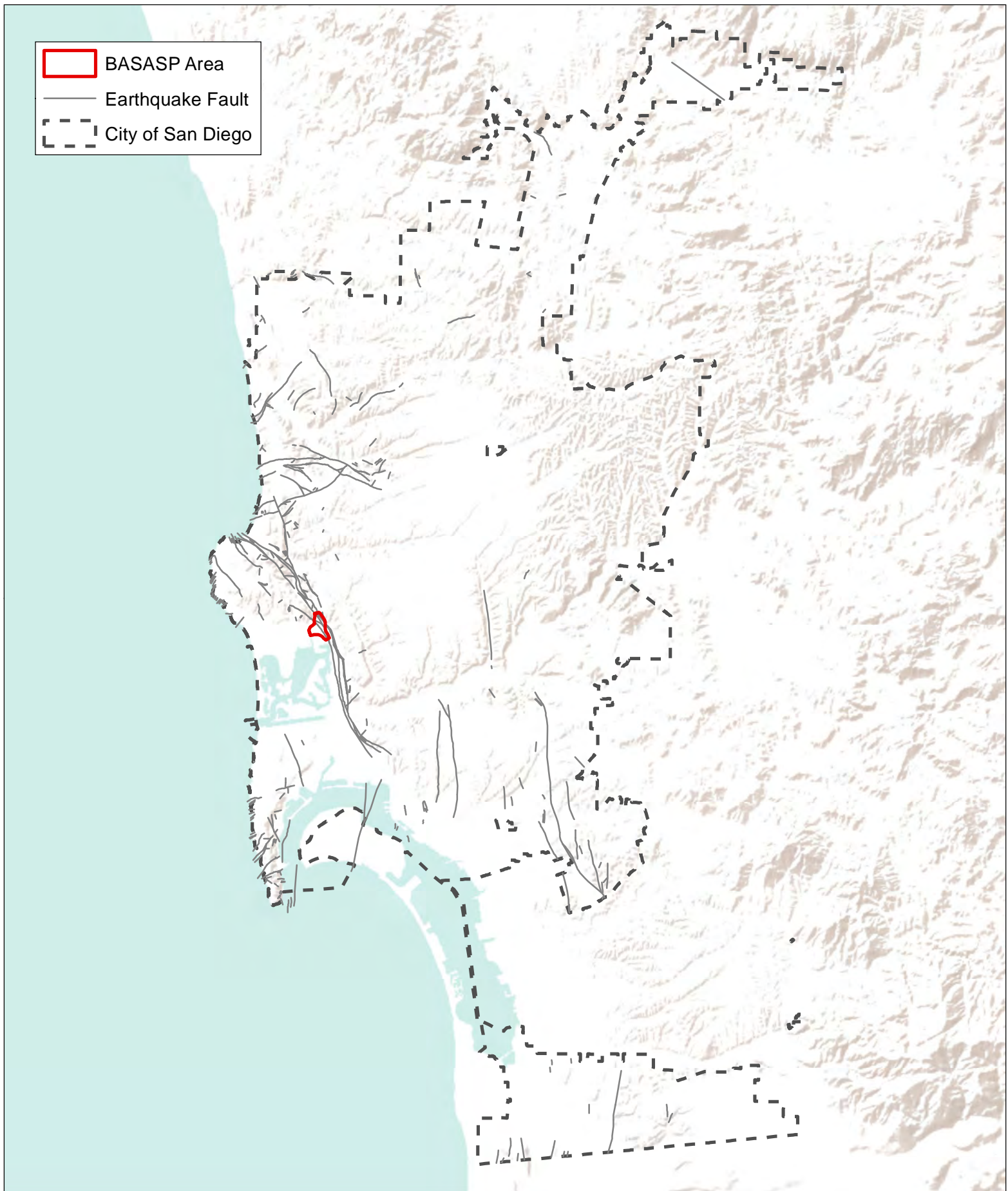
The majority of the BASASP area is underlain by hydraulically placed fills, which are classified as having a high liquefaction potential (Geologic Hazard Category 31) in the City Seismic Safety Study (City 2008a). Young alluvial deposits mapped within portions of Rose Canyon have a low liquefaction potential (Category 32). Young colluvial deposits and old alluvial deposits, and localized areas of old paralic deposits may exhibit moderate to high liquefaction potential. Soil materials associated with the San Diego Formation, Scripps Formation, Ardath Shale, and Mount Soledad Formation are considered non-liquefiable.

Landslides and Mudslides

The occurrence of landslides and other types of slope failures (e.g., mudslides) is influenced by a number of factors, including slope grade, geologic and soil characteristics, moisture levels, and vegetation cover. Landslides and mudslides can be triggered by one or more potentially destabilizing conditions or events, such as gravity, fires, precipitation, grading, and seismic activity. According to the City Seismic Safety Study (2008), there are no known mapped landslides within the BASASP area.

Tsunamis and Seiches

Tsunamis (commonly referred to as tidal waves) are sea waves generated by sources such as underwater earthquakes or volcanic eruptions, and can generate impacts related to inundation in coastal zones. Seiches are defined as wave-like oscillatory movements in enclosed or semi-enclosed



Balboa Avenue Station Area Specific Plan

Regional Fault Map

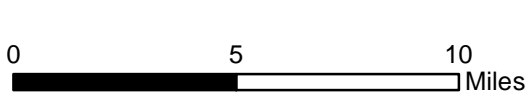


Figure 5.5-3

bodies of water such as lakes or reservoirs, and are most typically associated with seismic activity. Seiches can result in flooding damage and related effects (e.g., erosion) in surrounding areas from spilling or sloshing water, as well as increasing pressure on containment structures. The BASASP area is located approximately two miles inland from the Pacific Ocean and approximately 0.25 mile northeast of Mission Bay. Therefore, the area is not likely to be inundated due to tsunami or seiche. Furthermore, the BASASP area is not located within a mapped tsunami inundation area based on the State of California Tsunami Inundation Map for Emergency Planning La Jolla Quadrangle (2009).

5.5.2 Regulatory Framework

5.5.2.1 Federal

International Building Code

The International Building Code (IBC) (which encompasses the former Uniform Building Code [UBC]) is produced by the International Code Council (formerly the International Conference of Building Officials) to provide standard specifications for engineering and construction activities. The IBC provides standard specifications for engineering and construction activities, including measures to address geologic and soil concerns. Specifically, these measures encompass issues such as seismic loading (e.g., classifying seismic zones and faults), ground motion, engineered fill specifications (e.g., compaction and moisture content), expansive soil characteristics, and pavement design. The referenced guidelines, while not comprising formal regulatory requirements per se, are widely accepted by regulatory authorities and are routinely included in related standards such as municipal grading codes. The IBC guidelines are regularly updated to reflect current industry standards and practices, including criteria such as the American Society of Civil Engineers (ASCE) and ASTM International (formerly the American Society for Testing and Materials [ASTM]).

5.5.2.2 State

California Seismic Hazards Mapping Act

The California Seismic Hazards Mapping Act (PRC; Division 2, Chapter 7.8, Section 2690 et seq.) provides a statewide seismic hazard mapping and technical advisory program to assist local governments in protecting public health and safety relative to seismic hazards. The act provides direction and funding for the State Geologist to compile seismic hazard maps and to make those maps available to local governments. The Act, along with related standards in the Seismic Hazards Mapping Regulations (CCR Title 14, Division 2, Chapter 8, Article 10, Section 3270 et seq.), also directs local governments to require the completion and review of appropriate geotechnical studies prior to approving development projects. These requirements are implemented on a local level through means such as general plan directives and regulatory ordinances (with applicable local standards outlined below).

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Act (PRC Section 2621 et seq.) is intended to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones (previously called Special

Studies Zones and Fault-Rupture Hazard Zones) around the surface traces of active faults, and to distribute maps of these zones to all affected cities, counties, and state agencies. The Act also requires completion of a geologic investigation prior to project approval, to demonstrate that applicable structures will not be constructed across active faults and/or that appropriate setbacks from such faults (generally 50 feet) are included in the project design.

California Building Code

The CBC (CCR Title 24, Part 2) encompasses a number of requirements related to geologic issues. Specifically, these include general provisions (Chapter 1); structural design, including soil and seismic loading (Chapters 16/16A); structural tests and special inspections, including seismic resistance (Chapters 17/17A); soils and foundations (Chapters 18/18A); concrete (Chapters 19/19A); masonry (Chapters 21/21A); wood, including consideration of seismic design categories (Chapter 23); construction safeguards (Chapter 33); and grading, including excavation, fill, drainage, and erosion control criteria (Appendix J). The CBC encompasses standards from other applicable sources, including the IBC, as outlined above, and ASTM International, with appropriate amendments and modifications to reflect site-specific conditions and requirements in California.

5.5.2.3 Local

City of San Diego Seismic Safety Study

The previously referenced Seismic Safety Study includes geologic hazard maps of the City. Areas of the City are identified by geologic category, which reflect the geologic hazard type and related risks. These are generalized maps. Site-specific geologic/geotechnical investigations may be necessary for proposed development or construction (see Development Services Department Information Bulletin 515 and San Diego Municipal Code 145.1803 for more information).

City of San Diego General Plan Policies

The Public Facilities, Services and Safety Element of the City General Plan (2008a) identifies a number of applicable policies related to seismic, geologic, and structural considerations. Specifically, Policies PF-Q.1 and PF-Q.2 include measures regarding conformance with State laws related to seismic and geologic hazards, conducting/reviewing geotechnical investigations, and maintaining structural integrity with respect to geologic hazards.

Additional City of San Diego Requirements

In addition to the regulatory standards listed above, City requirements related to geologic/geotechnical issues include obtaining a grading permit (per Article 9, Division 6, Section 129.0601 et seq. of the City Municipal Code), and conformance with applicable elements of the City Storm Water Standards Manual and related documents (per Article 3, Division 3, Section 43.0301 et seq. of the City Municipal Code), with storm water standards discussed in more detail in Section 5.9, *Hydrology, Water Quality, and Drainage*, as previously noted.

5.5.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), as modified to reflect a programmatic analysis for the proposed BASASP, impacts related to geology and soils would be significant if implementation of the proposed BASASP would:

1. Result in the exposure of people or property to geologic hazards such as ground shaking, fault rupture, landslides, mudslides, ground failure, or similar hazards;
2. Result in a substantial increase in wind or water erosion of soils; or
3. Result in structures being located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

5.5.4 Issue 1: Geologic Hazards

Would the proposed BASASP result in the exposure of people or property to geologic hazards such as ground shaking, fault rupture, landslides, mudslides, ground failure, or similar hazards?

5.5.4.1 Impacts

Future development proposed under the BASASP would be required, at the project level, to conform to applicable City General Plan and other ~~plans standards~~ as outlined above in Section 5.5.1.2, as well as other pertinent regulatory/industry and code requirements related to geologic and safety concerns (e.g., the CBC and emergency response plans).

Fault Rupture

The potential for seismic-related ground rupture hazards is generally considered high due to the existence of several strands of the active RCFZ that cross the eastern portions of the BASASP area. Future development associated with the proposed project could potentially be subject to significant seismic-related ground rupture hazards. All proposed development and development activities associated with the proposed project would be required to conform to applicable regulatory/industry and code standards related to geologic hazards as noted, including pertinent elements of the Seismic Hazards Mapping Act, Alquist-Priolo Earthquake Fault Zoning Act, CBC, and related City standards. Specifically, this would include investigation of potential active faults and associated structural setbacks or other applicable measures to address surface/fault rupture hazards. Based on the noted requirements for regulatory/industry conformance, potential impacts related to fault rupture hazards from implementation of the proposed project would be less than significant.

Ground Shaking

Future development conducted under the proposed project would be subject to potentially significant impacts related to seismic ground shaking, as outlined above in Section 5.5.1.2 and Table 5.5-1. All such development and development activities, however, would be required to conform to applicable regulatory/industry and code standards related to geologic hazards, including seismic ground shaking. Specifically, this would include pertinent elements of the Seismic Hazards

Mapping Act, CBC/IBC, and related City standards. Associated criteria under the CBC, for example, include: (1) applicable seismic loading factors for the design of facilities such as structures, foundations/slabs, pavement, and utilities; (2) remedial grading standards (e.g., removing/replacing and/or reconditioning unsuitable soils); (3) appropriate manufactured slope, retaining wall, and drainage design; and (4) proper fill composition/placement (i.e., engineered fill). Implementation of such measures in conformance with applicable regulatory/industry standards would be mandated through required efforts such as completion of appropriate site-specific geotechnical investigations required under related City standards and codes. Structural damage from ground shaking could be substantial. However, structural design in accordance with current building codes could reduce the impact to an acceptable risk.

Liquefaction

As previously described and shown on Figure 5.5-2, a majority of the BASASP area is underlain by liquefiable soils. Accordingly, associated future development activities may be subject to potentially significant impacts related to liquefaction and associated subsidence/settlement. The potential for lateral spreading is low due to the lack of steep slopes in the BASASP area. All future development activities under the proposed project would be required to conform to applicable regulatory/industry and code standards related to liquefaction and associated hazards, including lateral spreading. Specifically, this would involve pertinent elements of the Seismic Hazards Mapping Act, CBC/IBC, and related City standards, with associated potential efforts such as: (1) remedial grading standards (e.g., removing/replacing and/or reconditioning unsuitable soils); (2) appropriate manufactured slope, retaining wall, and drainage design (including the installation of subdrains in applicable areas); (3) measures such as deep soil mixing (i.e., introducing cement to consolidate loose soils), stone columns to provide support (i.e., by extending columns into competent underlying units), and designing for potential settlement of liquefiable materials through means such as use of post-tensioned foundations or flexible couplings for utility connections; and (4) proper fill composition/placement (i.e., engineered fill). Implementation of appropriate measures in conformance with applicable regulatory/industry standards would be mandated through required efforts including completion of appropriate site-specific geotechnical investigations required under related City standards and codes. Compliance with the noted requirements for regulatory/industry conformance could reduce potential impacts related to seismic liquefaction and associated subsidence/settlement and lateral spreading from implementation of the proposed project to an acceptable risk.

Landslides and Mudslides

As described in Section 5.5.1.1 and shown on Figure 5.5-2, there are no known mapped landslides within, or adjacent to, the BASASP area. Additionally, much of the BASASP area contains relatively level topography. Most existing slopes within the BASASP area are located along the embankments of Rose Creek with a gradient of 2:1 (horizontal: vertical) or flatter. Slopes characterized by gradients of 2:1 or flatter are generally considered stable. Therefore, the potential for slope instability within this portion of the BASASP area is considered low. The potential for slope instability is considered very low in the remainder of the BASASP area due to relatively level topography. Impacts related to landslides and slope instability would therefore be less than significant.

Ground Lurching

Ground lurching is a permanent displacement or shift of the ground in response to seismic shaking. Ground lurching occurs in areas with high topographic relief, and usually occurs near the source of an earthquake. Based on proximity to the RCFZ, ground lurching is a potential hazard within the BASASP area. Future development activities conducted under the proposed project may be subject to potentially significant impacts related to ground lurching. Future development would be subject to site-specific geotechnical investigation and, as applicable, associated regulatory/industry and code standards related to ground lurching hazards. Accordingly, if associated potential impacts are identified during site-specific geotechnical investigation, development activities would be required to implement applicable design/remedial measures to avoid or reduce potential ground lurching effects below a level of significance. Specifically, this could include efforts such as remedial grading and/or appropriate foundation design as outlined above for ground shaking, liquefaction, and related hazards.

Seismic Settlement

Differential seismic settlement occurs when seismic shaking causes one type of soil to settle more than another type. It may also occur within a soil deposit with largely homogenous properties if the seismic shaking is uneven due to variable geometry or thickness of the soil deposit. Much of the BASASP area is underlain by fill and alluvial soil materials of variable thickness. Areas with low to moderate potential for differential settlement may exist in these soil materials, particularly where transitions between fill thickness and consistency of alluvium occur. Differential settlement may also occur where the fill and alluvial soil materials transition to dense formational materials along the sides of Rose Canyon.

Future development activities conducted under the proposed project may be subject to potentially significant impacts related to seismic settlement. Future development would be subject to site-specific geotechnical investigation and, as applicable, associated regulatory/industry and code standards. Accordingly, if associated potential impacts are identified during site-specific geotechnical investigation, development activities would be required to implement applicable design/remedial measures to avoid or reduce potential settlement effects below a level of significance. Specifically, this could include efforts such as remedial grading and/or appropriate foundation design as outlined above for ground shaking, liquefaction, and related hazards.

Tsunamis and Seiches

As previously described, based on the State of California Tsunami Inundation Map for Emergency Planning La Jolla Quadrangle (2009), the BASASP area is not considered to be subject to tsunami-related hazards. Similarly, the BASASP area is not located in proximity to water features capable of generating substantial seiche-related hazards, with the closest such water body being Mission Bay, located approximately 0.25 mile to the south at its closest point. Based on the described conditions, potential impacts related to tsunami- and seiche-related hazards from implementation of the proposed project would be less than significant.

5.5.4.2 Significance of Impact

Potential impacts related to geologic hazards from implementation of the proposed project would be avoided, reduced to an acceptable level of risk, or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the IBC/CBC, City Municipal Code, and other pertinent requirements as outlined in Section 5.5.1.2.

5.5.4.3 Mitigation Framework

With conformance to applicable regulatory/industry standard and codes, including the IBC/CBC, SDMC, and other pertinent requirements as outlined in Section 5.5.1.2.; impacts would be less than significant and no mitigation is required.

5.5.4.4 Significance After Mitigation

Impacts would be less than significant.

5.5.5 Issue 2: Erosion and Sedimentation

Would the proposed BASASP result in a substantial increase in wind or water erosion of soils?

5.5.5.1 Impacts

Potential hazards related to erosion and sedimentation within the BASASP area are generally low in level areas and higher on steeper slopes. Even in level areas, however, erosion and sedimentation hazards can be increased through development-related activities such as excavation/grading and removal of stabilizing structures and vegetation. Developed areas would be most susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Erosion and sedimentation are not considered to be significant long-term concerns in the BASASP area, as developed areas would be stabilized through installation of structures/hardscape and landscaping.

Short-term erosion and sedimentation impacts would be addressed through conformance with applicable elements of the City storm water program and related NPDES standards. Specifically, this would entail conformance to applicable City regulatory codes as outlined in Section 5.9.2.1, as well as the NPDES Construction General Permit. Pursuant to the discussion of construction-related water quality concerns in Section 5.9, this would entail implementing an approved Storm Water Pollution Prevention Plan (SWPPP) and related plans and BMPs, including appropriate measures to address erosion and sedimentation. Based on implementation of appropriate erosion and sediment control BMPs as part of, and in conformance with, an approved SWPPP and related City and NPDES requirements, associated potential erosion and sedimentation impacts from implementation of the proposed project would be less than significant.

5.5.5.2 Significance of Impact

Potential impacts related to erosion and sedimentation from implementation of the proposed project would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including applicable requirements under the City Storm Water Program and NPDES as outlined in Section 5.9.2.1.

5.5.5.3 Mitigation Framework

Impacts would be less than significant, and no mitigation is required.

5.5.5.4 Significance After Mitigation

Impacts would be less than significant.

5.5.6 Issue 3: Geologic Stability

Would the proposed BASASP result in structures being located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site subsidence, expansive soil, or collapse?

5.5.6.1 Impacts

Subsidence

Non-seismic soil subsidence is most typically associated with conditions such as karst/limestone terrain (i.e., the formation of subsurface cavities by dissolution of soluble rocks), subsurface mining, large-scale groundwater or oil and gas withdrawal, or decomposition of thick organic (peat) layers. Subsidence can result in a loss of support capability within the associated soil or formational materials, potentially resulting in damage to surface and subsurface structures such as buildings, pavement, and utilities.

Potential impacts related to subsidence from implementation of the proposed project would be less than significant, based on the following considerations: (1) the above described conditions/activities are not present or proposed as part of the BASASP; (2) while shallow groundwater may be present in portions of the BASASP area, associated construction dewatering requirements related to future development activities are expected to be relatively minor in extent and short-term in duration; and (3) as previously described, future development activities would be subject to appropriated site-specific geotechnical review per applicable regulatory/industry standards (including City and IBC/CBC criteria), with associated remedial requirements potentially including efforts such as removal of unstable or unsuitable materials, use of properly engineered fill, and provision of appropriate foundations and/or soil improvements (e.g., deep soil mixing) to provide support to ensure stability.

Collapse

Soil collapse, or near-surface subsidence, is generally associated with: (1) hydroconsolidation, the tendency of unsaturated soils to rapidly lose fine material upon saturation; and (2) water table depression (lowering) due to groundwater withdrawal. Collapse associated with hydroconsolidation is most common in arid and semi-arid areas, with the associated effects generally localized but potentially substantial. Collapse related to groundwater withdrawal generally occurs over a wide region and a longer timeframe (i.e., decades), with less noticeable short-term effects. Soil collapse can result in settlement and related effects to overlying foundations or other improvements.

Potential impacts related to collapse from implementation of the proposed project would be less than significant. Specifically, this conclusion is based on the relatively low compression potential of near-surface materials within the BASASP area (AGE 2016), as well as similar considerations regarding future development activities and requirements for site-specific geotechnical review and remediation noted above for subsidence.

Expansive Soils

Expansive (or shrink-swell) behavior is attributable to the water-holding capacity of clay minerals, and can adversely affect the integrity of facilities such as pavement or structure foundations. The majority of soil materials in the BASASP area are non-expansive or possess a low expansion potential. Clayey soils possessing a moderate to high expansion may be locally encountered in colluvial deposits along the northwest border of the BASASP area and in the Ardath Shale along the eastern border of the BASASP area (AGE 2016). As a result, future development activities in applicable areas may be subject to potentially significant impacts related to expansive soils. As previously described, however, future development activities under the proposed project would be required to conform to applicable regulatory/industry and code standards related to expansive soil hazards. Specifically, this would involve pertinent elements of the CBC/IBC and related City standards, with associated potential standard remedial efforts such as removal/replacement or, if applicable, mixing of unsuitable materials with engineered and non-expansive fill; capping expansive materials with engineered fill in applicable areas; and use of appropriate foundation and/or footing design per site-specific geotechnical recommendations. Based on the conformance with the noted regulatory/ industry standards, potential impacts related to expansive soils from implementation of the proposed project would be less than significant.

Slope Stability

Most existing slopes within the BASASP area are located along the embankments of Rose Creek with a gradient of 2:1 (horizontal: vertical) or flatter. Slopes characterized by gradients of 2:1 or flatter are generally considered stable. Therefore, the potential for slope instability within this portion of the BASASP area is considered low. The potential for slope instability is considered very low in the remainder of the BASASP area due to relatively level topography.

An existing off-site slope with a maximum height of approximately 45 feet is located adjacent to the BASASP area along the east side of Morena Boulevard, south of the intersection with Balboa Avenue. The majority of the slope was constructed with a 2:1 slope gradient or flatter; however, portions of this slope have a 1:1 slope gradient or steeper. No visual indications of slope instability were observed along this slope (AGE 2018). Moreover, this slope occurs outside of the BASASP area and

on the east side of I-5, where no land use changes are proposed as part of the project. Impacts related to slope instability would therefore be less than significant.

Shallow Groundwater

Shallow groundwater may be present locally in much of the BASASP area at depths of less than 20 feet bgs. While the presence of shallow groundwater is not a geologic or geotechnical hazard, per se, it can contribute to other potential hazards (e.g., liquefaction) as outlined above, and may necessitate temporary dewatering to accommodate development-related grading and excavation. If such dewatering were required for future development activities under the proposed project, it would be subject to associated requirements under the appropriate NPDES Groundwater Permit (as discussed in Section 5.9). Based on required conformance with associated regulatory standards, potential impacts related to the presence of shallow groundwater would be less than significant.

5.5.6.2 Significance of Impact

Potential impacts related to geologic instability from implementation of the proposed project would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the IBC/CBC and pertinent City criteria.

5.5.6.3 Mitigation Framework

Impacts would be less than significant, and no mitigation is required.

5.5.6.4 Significance After Mitigation

Impacts would be less than significant.

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5.6 Greenhouse Gas Emissions

This section is based on the information and analysis presented in the Greenhouse Gas Emissions Technical Report for the proposed project, dated March 2018 (HELIX 2018c). The technical report is included in its entirety as Appendix E.

5.6.1 Existing Conditions

5.6.1.1 Statewide and Regional GHG Emissions

The California Air Resources Board (CARB) performs statewide greenhouse gas (GHG) inventories. The inventory is divided into six broad sectors; agriculture and forestry, commercial, electricity generation, industrial, residential, and transportation. Emissions are quantified in million metric tons (MMT) of carbon dioxide equivalents (CO₂e). Table 5.6-1, *California Greenhouse Gas Emissions by Sector*, shows the estimated statewide GHG emissions for the years 1990, 2000, 2010, and 2015.

Table 5.6-1
CALIFORNIA GREENHOUSE GAS EMISSIONS BY SECTOR
(MMT CO₂e)

Sector	1990	2000	2010	2015
Agriculture and Forestry	18.9 (4%)	32.0 (7%)	34.6 (8%)	34.7 (8%)
Commercial	14.4 (3%)	14.3 (3%)	20.1 (5%)	22.2 (5%)
Electricity Generation	110.5 (26%)	105.4 (23%)	90.6 (20%)	84.1 (19%)
Industrial	105.3 (24%)	104.6 (22%)	101.1 (23%)	103.0 (23%)
Residential	29.7 (7%)	31.2 (7%)	31.3 (7%)	26.9 (6%)
Transportation	150.6 (35%)	179.5 (38%)	168.1 (38%)	169.4 (38%)
Unspecified Remaining	1.3 (<1%)	0.4 (<1%)	0.3 (<1%)	0.2 (<1%)
TOTAL	433.3	468.8	456.0	459.3

Source: CARB 2007 and CARB 2017b

As shown in Table 5.6-1, statewide GHG emissions totaled 433 MMT CO₂e in 1990, 469 MMT CO₂e in 2000, 456 MMT CO₂e in 2010, and 459 MMT CO₂e in 2015. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

A San Diego regional emissions inventory was prepared by the University of San Diego School of Law Energy Policy Initiative Center (EPIC) that took into account the unique characteristics of the region. Their 2010 emissions inventory for San Diego is duplicated below in Table 5.6-2, *San Diego County Greenhouse Gas Emissions by Sector*. The sectors included in this inventory are somewhat different from those in the statewide inventory. Similar to the statewide emissions, transportation-related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

Table 5.6-2
SAN DIEGO COUNTY GREENHOUSE GAS EMISSIONS BY SECTOR
(MMT CO₂e)

Sector	2010
On-road Transportation	14.4 (43%)
Electricity	8.3 (25%)
Natural Gas Consumption	2.9 (9%)
Off-Road Equipment and Vehicles	1.4 (4%)
Civil Aviation	1.9 (6%)
Waste	0.6(2%)
Industrial	1.8 (5%)
Water-Borne Navigation	0.1 (<1%)
Rail	0.3 (1%)
Agriculture/Forestry/Land Use	0.5 (2%)
Other	1.6 (5%)
Sequestration	-0.7 (-2%)
TOTAL	33.2

Source: University of San Diego 2013

5.6.1.2 City of San Diego CAP Inventory

A San Diego regional emissions inventory, prepared as part of the City of San Diego Climate Action Plan (CAP), reported GHG emissions totaling 13 MMT CO₂e in 2010. Similar to the statewide emissions, transportation-related GHG emissions contributed the most citywide, followed by emissions associated with energy use.

5.6.1.3 BASASP Area GHG Inventory

A baseline analysis of the existing GHG emissions from the BASASP area land uses and associated traffic was performed using CalEEMod Version 2016.3.2. Both land use and traffic assumptions were adapted from the traffic impact study prepared for the proposed project (Kimley-Horn 2017). This is the same methodology as that was used for estimating GHG emissions resulting from the adopted Community Plans (Pacific Beach and Clairemont Mesa) and proposed project buildout described below. In brief, CalEEMod is a computer model that estimates GHG emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating and cooling, ventilation and lighting, and plug-in appliances), water use, and solid waste disposal based on land use categories.

Table 5.6-3, *Existing Balboa Avenue Station Area Specific Plan Land Uses*, lists the existing land use quantities that were input to CalEEMod to estimate existing area GHG emissions.

**Table 5.6-3
EXISTING BALBOA AVENUE STATION AREA
SPECIFIC PLAN LAND USES**

Land Use	Existing (2016)
Arterial Commercial (square feet)	184,588
Automobile Dealership (square feet)	55,088
Automobile Repair Shop (square feet)	8,000
Health Club (square feet)	40,418
Hotel (Low-Rise) (Motel) (square feet)	78,410
Industrial Park (square feet)	109,100
Multi-Family Residential (dwelling units)	672
Office (square feet)	72,147
Health Care (square feet)	43,192
Transportation (square feet)	400
Public Storage (square feet)	308,746
Service Station (square feet)	2,556
Single Family (dwelling units)	91

Source: Kimley-Horn 2017

The complete calculations of existing GHG emissions, including the CalEEMod input parameters and reported results, are included in Appendix E and summarized below.

Vehicle Emissions

CalEEMod estimates vehicle emissions by first calculating trip rate, trip length, trip purpose, and trip type percentages (e.g., home to work, home to shop, home to other) for each land use type, based on the land use types and quantities entered by the user in the land use module. For this analysis, the CalEEMod default trip rates and lengths were edited to reflect the trip rates and vehicle miles traveled (VMT) identified for each land use subtype in the traffic impact study prepared for the BASASP (Kimley-Horn 2017). Based on these inputs, the total annual vehicle miles traveled (VMT) was estimated to be 286 million miles, and vehicle-related GHG emissions were estimated to be 127,932 MT CO₂e per year.

Energy Use Emissions

CalEEMod default energy consumption values assume compliance with the 2016 Title 24 energy code. Adjustments to simulate the 2005 Title 24 energy code are available in the model by selecting the "use historical data" box. Therefore, for the existing conditions energy emissions estimate the historical data box was selected in order to reflect GHG emissions from energy use as associated with a building built to the 2005 Title 24 energy code. Based on the existing land use inputs identified in Table 5.6-3 and average electricity and natural gas consumption rates adjusted to 2005 Title 24 Energy Efficiency Standards in CalEEMod, the proposed BASASP area's existing buildings are estimated to emit approximately 5,810 MT CO₂e per year.

Area Sources

CalEEMod estimates that existing area sources (fireplaces, woodstoves, and landscape maintenance equipment), determined from the land use inputs identified in Table 5.6-4, emit approximately 1,165 MT CO₂e per year.

Water Use Emissions

Water-related GHG emissions are from the conveyance and treatment of water. The California Energy Commission's 2006 Refining Estimates of Water-Related Energy Use in California defines average energy values for water in Southern California. These values are used in CalEEMod to establish default water-related emission factors. Using these defaults, the existing estimated GHG emissions related to water treatment and conveyance is 1,246 MT CO₂e per year.

Solid Waste Emissions

Existing solid waste generation within the BASASP area was estimated by CalEEMod by multiplying the land use inputs identified in Table 5.6-3 with average waste generation rates obtained from the California Department of Resources Recycling and Recovery (CalRecycle). Using these defaults, the existing estimated GHG emissions related to solid waste is 965 MT CO₂e per year.

Total Existing BASASP Area GHG Emissions

The results of the analysis described above indicate that the existing (2016) BASASP area uses are currently generating approximately 137,118 MT CO₂e annually as shown in Table 5.6-4, *Existing Balboa Avenue Station Area Specific Plan Area Greenhouse Gas Emissions*, below.

Table 5.6-4
EXISTING BALBOA AVENUE STATION AREA
SPECIFIC PLAN AREA GREENHOUSE GAS EMISSIONS

Source	MT CO ₂ e per year
Area	1,165
Energy	5,810
Mobile	127,932
Solid Waste	965
Water	1,246
TOTAL	137,118

Source: CalEEMod outputs provided in Appendix E

5.6.2 Regulatory Framework

5.6.2.1 Federal

Federal Clean Air Act

In the past, the USEPA has not regulated GHGs under the Federal CAA. However, the U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency*, that CO₂ is an air pollutant, as defined under the CAA, and that the USEPA has the authority to regulate emissions

of GHGs. After a thorough examination of the scientific evidence and careful consideration of public comments, the USEPA announced on December 7, 2009, that GHGs (including CO₂, CH₄, N₂O, HFC, PFC, and SF₆) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing the USEPA's proposed GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the U.S. Department of Transportation's (USDOT) National Highway Traffic Safety Administration (NHTSA) on September 15, 2009.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the NHTSA have worked together to develop a national program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require vehicles to meet a 2016 standard that is equivalent to 35.5 miles per gallon (mpg), and a 2025 standard that is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will be made through improvements in air conditioning leakage and the use of alternative refrigerants that would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons (MT) and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other states that have adopted the California standards (USEPA 2011, USEPA and NHTSA 2012).

5.6.2.2 State

California Energy Code

The California Code of Regulations (CCR) Title 24 Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in GHG emissions. Therefore, increased energy efficiency results in decreased GHG emissions. The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The latest update to the Title 24 standards occurred in 2016 and went into effect on January 1, 2017. The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential standards include improvements for attics, walls, water heating, and lighting. The 2019 standards will continue to improve upon the 2016 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 standards will go into effect on January 1, 2020.

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that

vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

Executive Order S-3-05

Executive Order (EO) S-3-05, signed by Governor Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to year 1990 levels by the year 2020, and for an 80 percent reduction in GHG emissions by the year 2050. EO S-3-05 also calls for the California Environmental Protection Agency (CalEPA) to prepare biennial science reports on the potential impact of continued global warming on certain sectors of the California economy. The first of these reports, "Scenarios of Climate Change in California: An Overview" (February 2006), concluded that, under the report's emissions scenarios, the impacts of global warming in California are anticipated to include, but are not limited to: public health, biology, rising sea levels, hydrology and water quality, and water supply.

Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28 nation European Union. California is on track to meet or exceed the target of reducing GHG emissions to 1990 levels by 2020, as established in AB 32. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050.

Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a GHG emissions limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. On January 1, 2011, specific GHG emissions limits and reduction measures in line with AB 32 were adopted; these became enforceable on January 1, 2012.

As of October 31, 2011, 18 of 30 CARB regulations had been approved, including nine discrete early actions, as required by AB 32. The current estimate for the necessary GHG emissions reductions to attain the goals of AB 32 (i.e., 1990 levels by 2020) is 174 MMT of CO₂e. It is estimated that the nine proposed discrete early actions identified by CARB will provide approximately 16 MMT CO₂e of GHG reductions while the other early actions will provide approximately 26 MMT CO₂e of GHG reductions. It also is anticipated that an additional 30 MMT CO₂e in reductions will be achieved from the passage of anti-idling measures and AB 1493 (described below). The remaining 102 MMT CO₂e reductions are expected to be achieved through CARB's Scoping Plan and other emission reduction efforts by members of the Climate Action Team (CAT). As of January 1, 2014, (as described below) CARB will update its Scoping Plan at least once every five years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

Senate Bill 32 and Assembly Bill 197

As a follow-up to AB 32 and in response to EO B-30-15, SB 32 was passed by the California legislature in August 2016 to codify the EO's California GHG reduction target of 40 percent below 1990 levels by 2030, and requires the State to invest in the communities most affected by climate change. AB 197 establishes a legislative committee on climate change policies to help continue the State's activities to reduce GHG emissions.

Assembly Bill 1493 – Vehicular Emissions of Greenhouse Gases

In response to the transportation sector accounting for more than half of California's CO₂ emissions, AB 1493 (Pavley) was enacted on July 22, 2002. AB 1493 requires CARB to set GHG emissions standards for passenger vehicles, light-duty trucks, and other vehicles determined to be vehicles whose primary use is noncommercial personal transportation in the State and that were manufactured in year 2009 or later. In setting these standards, CARB considered cost effectiveness, technological feasibility, and economic impacts and adopted the standards in September 2004. When fully phased in, the near-term (years 2009 to 2012) standards would result in a reduction of approximately 22 percent in GHG emissions compared to the emissions from the year 2002 fleet, while the midterm (years 2013 to 2016) standards would result in a reduction of approximately 30 percent. Standards that regulate vehicles model years 2009 through 2016 are termed "Pavley I". CARB adopted a second phase of the Pavley regulations, termed "Pavley II," which are now called the Low Emission Vehicle III (LEV III) Standards. LEV III covers Model Years 2017 through 2025. Some currently used technologies that achieve GHG reductions include small engines with superchargers, continuously variable transmissions, and hybrid electric drives. To set its own GHG emissions limits on motor vehicles, California had to receive a waiver from the USEPA which was approved in June 2009.

Executive Order S-01-07 – Low Carbon Fuel Standard

This EO, signed by Governor Schwarzenegger on January 18, 2007, directs that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by the year 2020. It orders that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California and directs CARB to determine whether a LCFS can be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit reversed the District Court's opinion and rejected arguments that implementing LCFS violates the interstate commerce clause in September 2013. CARB is therefore continuing to implement the LCFS statewide.

Senate Bill 350

Approved by Governor Brown on October 7, 2015, SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard eligible resources, including solar, wind, biomass, and geothermal. In addition, large utilities are required to develop and submit Integrated Resource Plans to detail how each entity will meet their customers resource needs, reduce GHG emissions, and increase the use of clean energy.

Senate Bill 375

SB 375 was signed and passed into law on September 30, 2008. SB 375 enhances CARB's ability to reach AB 32 goals. Specifically, SB 375 requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles for the years 2020 and 2035. If regions develop integrated land use, housing, and transportation plans that meet the SB 375 targets, new projects in these regions can be relieved of certain review requirements of CEQA. The targets apply to the regions in the State covered by the 18 metropolitan planning organizations.

Senate Bill 743

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. These changes include the elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Further, parking impacts will not be considered significant impacts on the environment for select development projects within infill areas with nearby frequent transit service. According to the legislative intent contained in SB 743, these changes to current practice were necessary to more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.

Senate Bill 97

SB 97 required the Governor's Office of Planning and Research to develop recommended amendments to the State CEQA Guidelines for addressing GHG emissions, including the effects associated with transportation and energy consumption. The amendments became effective on March 18, 2010.

California Air Resources Board: Climate Change Scoping Plan

On December 11, 2008, CARB adopted the Climate Change Scoping Plan (Scoping Plan [CARB 2008]) as directed by AB 32. The Scoping Plan proposes a set of actions designed to reduce overall GHG emissions in California to the levels required by AB 32. Measures applicable to development projects include those related to energy-efficiency building and appliance standards, the use of renewable sources for electricity generation, regional transportation targets, and green building strategy. Relative to transportation, the Scoping Plan includes nine measures or recommended actions related to reducing vehicle miles traveled (VMT) and vehicle GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of measure-specific regulations and to adjust projections in consideration of the economic recession (CARB 2014b). To determine the amount of GHG emissions reductions needed to achieve the goal of AB 32 (i.e., 1990 levels by 2020), CARB developed a forecast of the AB 32 Baseline 2020 emissions, which is an estimate of the emissions expected to occur in the year 2020 if none of the foreseeable measures included in the Scoping Plan are implemented. CARB estimated the AB 32 Baseline 2020 to be 509 MMT of CO₂e. The Scoping Plan's current estimate of

the necessary GHG emission reductions is 78 MMT CO₂e (CARB 2014b). This represents an approximately 15.32 percent reduction. CARB is forecasting that this would be achieved through the following reductions by sector: 25 MMT CO₂e for energy, 23 MMT CO₂e for transportation, 5 MMT CO₂e for high-global warming potential GHGs, and 2 MMT CO₂e for waste. The remaining 23 MMT CO₂e would be achieved through Cap-and-Trade Program reductions. This reduction is flexible—if CARB receives new information and changes the other sectors' reductions to be less than expected, the agency can increase the Cap-and-Trade reduction (and vice versa).

In response to EO B-30-15 and SB 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target and, therefore, is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue driving down emissions. CARB is moving forward with a second update to the Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32. The 2017 Climate Change Scoping Plan Update, Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target, was released in draft form on January 20, 2017.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) is the first-in-the-nation statewide mandatory green building code. California requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and to install low pollutant-emitting finish materials. CALGreen has mandatory measures and additional measures designed to allow local cities to adopt codes that go beyond the State's mandatory provisions. Some key mandatory measures for commercial buildings include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 65 percent construction/demolition waste diversion from landfills (please note, AB 341 established a 75 percent diversion target; see Section 5.14.2.2), use of building finish materials that emit low VOCs, and building commissioning. Other key components include reduction in energy usage by 15 percent and increased reduction in potable water use. CALGreen includes the critical issue of compliance verification by utilizing the existing building code enforcement infrastructure, and allows local public agencies to incorporate CALGreen provisions into their construction field inspections. The mandatory CALGreen measures will be inspected and verified by local building departments.

The current version of CALGreen went into effect on January 1, 2017, and includes updated requirements for electric vehicle charging stations, "clean air vehicle" designated parking, food waste disposers, construction waste reduction, building maintenance and operation waste generation, and reference standards for fireplaces (CBSC 2016).

5.6.2.3 Regional

San Diego Association of Government's San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan [SANDAG 2015]) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The Regional Plan establishes a framework to increase the region's transportation sustainability and encourage smart growth. The Regional Plan encourages local

governments to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation. General urban form goals, policies, and objectives are summarized as follows:

- Mix compatible uses.
- Take advantage of compact building design.
- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, natural beauty, and critical environmental areas.
- Strengthen and direct development towards existing communities.
- Provide a variety of transportation choices.
- Make development decisions predictable, fair, and cost-effective.
- Encourage community and stakeholder collaboration in development decisions.

The Regional Plan also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

5.6.2.4 Local

City of San Diego General Plan

The General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to reduce the City's carbon footprint and to develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth related to climate change (City 2008). The Land Use and Community Planning Element; the Mobility Element; the Urban Design Element; and the Public Facilities, Services and Safety Element also identify GHG emission reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

City of San Diego Climate Action Plan

In October 2010, the City Council established the Environmental and Economic Sustainability Task Force as an independent advisory body to work with City staff on the development of a plan for both City operations and the community to reduce GHG emissions and to begin to evaluate vulnerabilities in the community and outline adaptation strategies. The City prepared a CAP that was

approved by the City Council in December 2015 (City 2015a). The CAP serves four primary purposes: (1) providing a roadmap for the City to achieve GHG reductions; (2) conforming the City's climate change efforts to California laws and regulations; (3) implementing climate change actions from the General Plan; and (4) providing CEQA tiering for the GHG emissions of new development.

To provide a mechanism for CEQA tiering, the City developed a CAP Consistency Checklist (Checklist) to provide a streamlined review process for GHG emissions analysis of proposed new developments that are subject to CEQA. The checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions, and incorporate the measures in this Checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

5.6.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), the proposed BASASP may have a significant effect on the environment with respect to GHG emissions if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The CAP was originally adopted in December 2015, and future implementing actions necessary for the CAP PEIR to serve as a Qualified GHG Reduction Plan under CEQA Guidelines Section 15183.5 were adopted by City Council on July 12, 2016. This section of the CEQA Guidelines permits for discretionary projects under CEQA that are consistent with the CAP, to be able to tier off the GHG analysis set forth in the CAP Final EIR, which was certified on December 15, 2015, with an addendum certified on July 12, 2016. Analysis within this PEIR directly tiers off of the CAP PEIR for cumulative GHG Emissions under Section 15183.5. As such, consistency with the City's CAP is used to evaluate the significance of the project's GHG impact.

5.6.4 Issue 1: Direct and Indirect Emissions of Greenhouse Gases

Would the proposed BASASP generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

5.6.4.1 Impacts

Emission estimates were calculated for the three GHGs of primary concern (CO₂, CH₄, and N₂O) that would be emitted from construction and the five primary operational sources that would be associated with the BASASP buildout: on-road vehicular traffic, use of fireplaces and consumer

products, energy use (composed of electricity use and natural gas consumption), water use, and solid waste disposal.

Adopted Community Plans Emissions

The projected GHG emissions for the BASASP area that would be generated from buildout (year 2035) of the adopted Pacific Beach and Clairemont Mesa Community Plans (herein referred to as Community Plans) were estimated using the buildout land use quantities in Table 5.2-5 (refer to Section 5.2, *Air Quality*). The complete calculations including the input parameters are included in Appendix E.

Construction Emissions

GHG emissions would be associated with the construction of new development under the adopted Community Plans through use of heavy equipment and vehicle trips by the construction crew commuting to the construction sites. Emissions of GHGs related to the construction of new development would be temporary. Based on the adopted Community Plans, proposed new development buildout land use quantities listed in Table 5.6-5, CalEEMod estimates that construction activities would generate a total of 3,335 MT CO₂e. While CalEEMod distributes construction activity emissions over each year at varying quantities depending on various model assumptions, for the purpose of this analysis, total construction GHG emissions were divided by 30 years in order to identify annual construction GHG emissions in accordance with City Guidance. Thus, annual construction GHG emissions associated with buildout of new land uses under the adopted Community Plans would be approximately 111 MT CO₂e per year.

Operational Emissions

Operational sources of GHG emissions include: (1) vehicle use; (2) energy use (electricity and natural gas); (3) area sources (fireplaces, woodstoves, and landscape maintenance equipment); (4) water conveyance and treatment; and (5) solid waste generation.

Vehicle Emissions

GHG emissions would be emitted from vehicles associated with adopted buildout of the Community Plans and would come from the combustion of fossil fuels in vehicle engines. The quantity and type of transportation fuel consumed, and the number of miles driven determines the amount of GHGs emitted from a vehicle. CalEEMod default trip rates and lengths were edited to reflect the trip rates and VMT identified for each land use subtype in the traffic impact analysis prepared for the BASASP (Kimley-Horn 2017).

Based on these inputs, the total annual VMT under the adopted Community Plans was estimated to be 337 million miles and the total emissions were estimated to be 94,724 MT CO₂e. Of this total, approximately 70,425 MT CO₂e would be emitted annually by vehicles associated with the existing/not changing land uses, and 24,299 MT CO₂e would be emitted by vehicles associated with new/changing land uses.

Energy Use Emissions

GHG emissions would be generated by the buildout use of electricity and combustion of natural gas under the adopted Community Plans. Statewide average annual energy consumption rates were used to estimate emissions that would occur from the existing land uses that would remain. The new/redeveloped land uses would be required to comply with 2016 Title 24 standards. According to CAPCOA Guidance, the reduction in energy use associated with this efficiency is based on building type, size, and climate zone. The adopted Community Plans' annual GHG emissions from energy use are estimated to be 7,811 MT CO₂e per year. Of this total, approximately 5,769 MT CO₂e would be associated with existing land uses, and 2,042 MT CO₂e would be associated with new/changing land uses.

Area Source Emissions

Buildout of land uses under the adopted Community Plans would emit GHGs from area sources, including landscape maintenance equipment, woodstoves, and fireplaces. CalEEMod estimates that approximately 1,855 MT CO₂e would be emitted annually given buildout land use projections of the adopted Community Plans. Of this total, approximately 1,150 MT CO₂e would be associated with existing land uses, and 705 MT CO₂e would be associated with new/changing land uses.

Water and Wastewater Emissions

The supply and treatment of water to end users of the adopted Community Plans would consume large amounts of energy, known as embodied energy. GHGs would be emitted from the generation of this embodied energy. Pre-2010 water consumption rates were used to estimate the emissions from the BASASP area's existing land uses that would remain. The BASASP area's new/redeveloped land uses would incorporate water-reduction features that would reduce water consumption and wastewater generation by 20 percent through mandatory compliance with CALGreen requirements. The adopted Community Plans' annual GHG emissions from water use are estimated to be 1,418 MT CO₂e per year. Of this total, approximately 1,609 MT CO₂e would be associated with existing land uses to remain, and 307 MT CO₂e would be associated with new development land uses.

Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. CalEEMod estimates that buildout of the adopted Community Plans would generate approximately 1,083 MT CO₂e. Of this total, approximately 960 MT CO₂e would be associated with existing land uses to remain, and 123 MT CO₂e would be associated with new development land uses.

Other GHG Emission Sources

Ozone is also a GHG; however, unlike other GHGs, ozone in the troposphere is relatively short lived and therefore is not global in nature. According to CARB, it is difficult to make an accurate determination of the contribution of ozone precursors (nitrogen oxides [NO_x] and VOCs) to global warming (CARB 2004). Therefore, it is assumed that emission of ozone precursors associated with the BASASP would not significantly contribute to climate change.

At present, there is a federal ban on chlorofluorocarbons (CFCs); therefore, it is assumed that the proposed project would not generate emissions of this GHG. Buildout of the adopted Community Plans may emit a small amount of HFC emissions from leakage, service of, and from disposal at the end of the life of refrigeration and air conditioning equipment. However, these emissions are not quantifiable and are assumed to be negligible. PFCs and sulfur hexafluoride are typically used in heavy-duty industrial applications. The adopted Community Plans do not include heavy-duty industrial applications. Therefore, it is not anticipated that the proposed project would contribute significant emissions of these GHGs.

Adopted Community Plans Emissions Summary

As illustrated in Table 5.6-5, *Adopted Community Plans Annual Greenhouse Gas Emissions*, buildout of the project area under the adopted Community Plans would result in 107,193 MT CO₂e per year.

**Table 5.6-5
ADOPTED COMMUNITY PLANS
ANNUAL GREENHOUSE GAS EMISSIONS**

Emission Source	Emissions (MT CO₂e/year)
Area	1,855
Energy	7,811
Mobile	94,724
Solid Waste	1,083
Water	1,609
Construction (amortized over 30 years)	111
TOTAL	107,193

CalEEMod output data is provided in Appendix E

Note: Totals may not add up exactly due to rounding

BASASP Emissions

The projected GHG emissions that would be generated from buildout of the BASASP were estimated using the buildout land use quantities in Table 5.2-5 (refer to Section 5.2, *Air Quality*). The complete calculations including the input parameters are included in Appendix E.

Construction Emissions

Based on the BASASP proposed new development buildout land use quantities, CalEEMod estimates that construction activities would generate a total of 74,971 MT CO₂e. While CalEEMod distributes construction activity emissions over each year at varying quantities depending on various model assumptions, for the purpose of this analysis, total construction GHG emissions were divided by 30 years in order to identify annual construction GHG emissions in accordance with City Guidance. Thus, annual construction GHG emissions associated with buildout of new land uses would be approximately 2,499 MT CO₂e per year.

Operational Emissions

Operational sources of GHG emissions include: (1) vehicle use; (2) energy use (electricity and natural gas); (3) area sources (fireplaces, woodstoves, and landscape maintenance equipment); (4) water conveyance and treatment; and (5) solid waste generation.

Vehicular Source Emissions

For this analysis, the CalEEMod default trip rates and lengths were edited to reflect the trip rates and VMT identified for each land use subtype in the traffic impact analysis prepared for the BASASP (Kimley-Horn 2017). Based on these inputs, the total annual VMT for the BASASP was estimated to be 376 million miles and the total emissions were estimated to be 106,987 MT CO₂e. Of this total, approximately 41,752 MT CO₂e would be emitted annually by vehicles associated with the existing/not changing land uses, and 65,235 MT CO₂e would be emitted by vehicles associated with new/changing land uses.

Energy Use Emissions

The BASASP's annual GHG emissions from energy use are estimated to be 15,011 MT CO₂e per year. Of this total, approximately 3,180 MT CO₂e would be associated with existing land uses, and 11,821 MT CO₂e would be associated with new/changing land uses.

Area Source Emissions

CalEEMod estimates that approximately 7,219 MT CO₂e would be emitted annually, given buildout land use projections of the BASASP. Of this total, approximately 1,029 MT CO₂e would be associated with existing land uses and 6,190 MT CO₂e would be associated with new/changing land uses.

Water Source Emissions

The BASASP's annual GHG emissions from water use are estimated to be 2,868 MT CO₂e per year. Of this total, approximately 894 MT CO₂e would be associated with existing land uses to remain, and 1,974 MT CO₂e would be associated with new development land uses.

Solid Waste Emissions

CalEEMod estimates that buildout of the BASASP would generate approximately 1,246 MT CO₂e from solid waste sources. Of this total, approximately 640 MT CO₂e would be associated with existing land uses to remain, and 606 MT CO₂e would be associated with new development land uses.

Other GHG Emission Sources

Other GHG emissions such as HFCs, PFCs and sulfur hexafluoride from buildout of the BASASP would be negligible for the same reasons discussed above for the adopted Community Plans. Therefore, it is not anticipated that the proposed project would contribute significant emissions of these GHGs.

BASASP Emissions Summary

As shown in Table 5.6-6, *BASASP Annual Greenhouse Gas Emissions*, buildout of the proposed project would result in GHG emissions of 135,820 MT CO₂e per year.

**Table 5.6-6
BASASP ANNUAL GREENHOUSE GAS EMISSIONS**

Emission Source	Emissions (MT CO ₂ e/year)
Area	7,219
Energy	15,011
Mobile	106,987
Solid Waste	1,246
Water	2,868
Construction (amortized over 30 years)	2,499
TOTAL	135,820

CalEEMod output data is provided in Appendix E

Note: Totals may not add up exactly due to rounding

Comparison of BASASP and Adopted Community Plans GHG Emissions

For the purposes of determining the increase in GHG emissions associated with the proposed project, GHG emissions attributable to the BASASP at full buildout were compared to GHG emissions associated with buildout of the BASASP area under the adopted Community Plans. As identified in Table 5.6-7, *Comparison of Adopted Community Plans, versus Proposed BASASP Emissions*, the total GHG emissions attributable to the adopted Community Plans equal 107,193 MT CO₂e per year. Total GHG emissions attributable to the BASASP equal 135,820 MT CO₂e per year.

Table 5.6-7 shows that the implementation of the proposed BASASP would result in an increase in GHG emissions of 28,627 MT CO₂e per year when compared to buildout of the BASASP area under the adopted Community Plans (and a decrease of 1,298 MT CO₂e compared to the existing condition [refer to Table 5.6-4]).

**Table 5.6-7
COMPARISON OF ADOPTED COMMUNITY PLANS
VERSUS PROPOSED BASASP EMISSIONS**

Emission Source	Annual Emissions (MT CO ₂ e/year)		
	Adopted Community Plans	BASASP	Difference
Area	1,855	7,219	5,365
Energy	7,811	15,001	7,190
Mobile	94,724	106,987	12,263
Solid Waste	1,083	1,246	163
Water	1,609	2,868	1,259
Construction (amortized over 30 years)	111	2,499	2,388
TOTAL	107,193	135,820	28,627

CalEEMod output data is provided in Appendix E

Note: Totals may not add up exactly due to rounding

5.6.4.2 Significance of Impact

For the purposes of determining significance, GHG emissions attributable to the project in year 2035 were compared to the adopted Community Plans GHG emissions. This comparison is appropriate because the GHG emissions from the adopted Community Plans were used when developing the City's CAP GHG Inventory.

As shown in Table 5.6-7, the BASASP would result in an increase in GHG emissions of 28,627 MT CO₂e per year when compared to the emissions that would occur within the BASASP area under the adopted Community Plans. This is because the BASASP would include an additional 3,593 multi-family dwelling units and 256,169 SF of arterial commercial over the adopted Community Plans. The majority of the new multi-family dwelling units and arterial commercial uses is planned within a 0.5-mile radius of the Balboa Avenue Station, which is a designated Transit Priority Area (TPA). By placing these uses within a TPA, the BASASP would implement the CAP and City of Villages strategies by focusing projected future growth into mixed-use and multiple-use activity centers that are pedestrian- and bicycle-friendly and linked to transit. Consistency with the CAP and City of Villages strategy however would result in implementation of the BASASP having an increase in aggregated GHG emissions from increased population, however, on a per capita basis a decrease of GHG emissions would occur within the BASASP. Further, overall citywide GHG emissions per capita would decrease, consistent with the City's CAP targets for citywide GHG emissions reductions.

Therefore, while the BASASP would increase aggregated GHG emissions over those of the adopted Community Plans at buildout (year 2035), this increase in GHG is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP and, thus, impacts associated with GHG emissions would be less than significant.

5.6.4.3 Mitigation Framework

Impacts would be less than significant; thus, no mitigation is required.

5.6.4.4 Significance After Mitigation

Impacts related to GHG emissions would be less than significant.

5.6.5 Issue 2: Consistency with Adopted Plans, Policies, and Regulations for the Purpose of Reducing GHG Emissions

Would the proposed BASASP conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

5.6.5.1 Impacts

The regulatory plans and policies discussed in Section 5.6.2 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry

and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to: reduce energy demand, impose emission caps on energy providers, establish minimum building energy and green building standards, transition to renewable non-fossil fuels, incentivize homeowners and builders, fully recover landfill gas for energy, and expand research and development.

Consistency with State Plans

As discussed earlier, EO S-3-05 and EO B-30-15 establish GHG emissions reduction targets for the State, and AB 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. Out of the Recommended Actions contained in CARB's Scoping Plan, the actions that are most applicable to the BASASP would be Actions E-1 and GB-1. CARB Scoping Plan Action E-1, together with Action GB-1 (Green Building), aim to reduce electricity demand by increasing the efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The new construction associated with the proposed BASASP would be required to include all mandatory green building measures under CALGreen. Therefore, the proposed BASASP would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

Consistency with Regional Plans

The proposed BASASP would be consistent with the goals of the Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The BASASP proposes to establish pedestrian-oriented, urban, and mixed-use community village areas that would reduce reliance on the automobile, and promote walking and use of alternative transportation. The BASASP supports the multi-modal strategy of the Regional Plan through the designation of community village land uses along a trolley corridor that would accommodate several transportation modes. Policies contained within the proposed BASASP Land Use and Mobility Chapters would serve to promote transit use as well as other forms of mobility, including walking and bicycling. These measures would be consistent with the Regional Plan's smart growth strategies. Furthermore, access to transit also results in the BASASP area being located within a designated Transit Priority Area consistent with Senate Bill 743. Thus, no significant adverse environmental effects would result from the BASASP in terms of consistency or conflict with the Regional Plan.

Consistency with Local Plans

New land use designations and policies within the BASASP have been designed to reflect and implement the CAP and the GHG reduction recommendations of the General Plan. Specifically, the BASASP includes multiple policies aimed at reducing GHG emissions from target emission sources and adapting to climate change. The proposed policies refine existing General Plan policies with site-specific recommendations applicable to the Balboa Avenue Station Area.

The CAP establishes five primary strategies for achieving the citywide goals of the plan. Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing

building energy consumption. Policies in the BASASP's Urban Design and Conservation Chapters address this strategy. Energy reduction can be achieved through the continued use or adaptive reuse of the existing building stock along with any needed energy efficiency upgrades. The BASASP includes narrative and policies in the aforementioned chapters for the creation of energy- and water-efficient buildings as well as sustainable building design and incorporation of building features that would reduce water consumption. This is coupled with reducing the dependency on non-renewable energy sources and the maximization of daylight and natural ventilation, the minimization of solar heat gain, and the reduction of emissions.

In regard to CAP Strategy 2, Clean & Renewable Energy, the Urban Design and Conservation Chapters of the BASASP include policies to encourage development that incorporates renewable energy, such as photo-voltaic panels on roof tops. The Conservation Chapter also contains an overarching goal to reduce dependence on non-renewable energy sources, and policies that include the use of sustainable building techniques for construction and operation of buildings that could include solar energy installations, electric vehicle charging stations, and solar water heating.

Strategy 3, Bicycling, Walking, Transit & Land Use, of the CAP has a number of goals that relate to land use and planning. Action 3.1 in Strategy 3 of the CAP calls for implementation of the General Plan's Mobility Element and the City of Villages strategy in TPAs to increase the use of transit. As discussed in Section 5.1.3 of this PEIR, the BASASP is consistent with the General Plan's Mobility Element and the City of Villages strategy and is thus consistent with Action 3.1 of the CAP. Further, a majority of the community is also within a half-mile walking distance to an existing or future transit stop, and thus, within a TPA. Policies have been included to promote walkability and connectivity through the construction of sidewalks and intersections, prioritization of multi-use urban path system improvements, support of a continuous and safe bicycle, and implementation of separated bicycle facilities where feasible.

Consistent with Actions 3.4 and 3.5 of Strategy 3, the BASASP includes policies to support intelligent transportation systems to improve roadway and parking efficiency and the exploration of traffic circle opportunities to reduce vehicle fuel consumption. Consistent with Action 3.6 of Strategy 3 of the CAP, the BASASP would implement transit-oriented development, particularly along Mission Bay Drive. Specific Mobility Chapter policies include, but are not limited to, coordinating with MTS and SANDAG to provide bicycle share stations, designated car share pick-up and drop-off areas, dedicated electric vehicle parking, dynamic parking management, real-time transit traveler information, and a wayfinding program for pedestrians and bicyclists.

The primary goal of CAP Strategy 4, Zero Waste – Gas & Waste Management, is to divert solid waste and capture landfill methane gas emissions. This strategy is Citywide in nature; however, the BASASP furthers this strategy by including policies in the Urban Design Chapter that support the use of recycled materials in public improvements, encouraging recycled or rapidly renewable source materials, and recycling of building materials for both public and private new development.

Strategy 5, Climate Resiliency, of the CAP calls for further analysis of the resiliency issues that face the various areas of the City. Resiliency is addressed throughout the BASASP as it pertains to water usage, energy efficiency, and sustainable development practices as noted above. Also included within the BASASP are policies supporting and encouraging an increase in the tree canopy within the community to reduce summer heat temperatures, increase absorption of pollutants and carbon dioxide, and contribute to a more inviting atmosphere for pedestrians.

As discussed above, analysis within this PEIR directly tiers off of the CAP PEIR for cumulative GHG Emissions under Section 15183.5. The BASASP is consistent with the adopted CAP, and contain goals and objectives that implement all of the five primary CAP strategies. Therefore, the project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases impacts, and impacts would be less than significant.

5.6.5.2 Significance of Impact

The proposed BASASP would develop compact, walkable communities close to transit connections and consistent with smart growth principles. The BASASP supports the multi-modal strategy of the SANDAG Regional Plan through improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Trolley Station. Policies contained within the proposed BASASP Land Use and Mobility Elements would serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. The proposed BASASP incorporates goals and policies intended to support the General Plan and CAP policies and thus, impacts associated with GHG emissions would be less than significant.

5.6.5.3 Mitigation Framework

Impacts would be less than significant; thus, no mitigation is required.

5.6.5.4 Significance After Mitigation

Impacts related to GHG emissions would be less than significant.

5.7 Historical and Tribal Cultural Resources

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place or object, which is of cultural value to a Tribe, and is either on or eligible for listing in the national, state, or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a Tribal Cultural Resource (PRC Section 21074).

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of historic buildings, structures, objects, or sites, prehistoric and archaeological resources, sacred sites and human remains, and tribal cultural resources determined to be significant or potentially significant under CEQA.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

This section of the PEIR analyzes the potential impacts on historical, archaeological, and tribal cultural resources resulting from implementation of the BASASP project. It documents the historical background for the project area and addresses historic buildings, structures, objects, or sites, prehistoric and historic archaeological resources, sacred sites, and human remains, and tribal cultural resources. The analysis in this section is based on the Cultural Resources Study prepared by HELIX Environmental Planning in 2018 (HELIX 2018d) and the Historic Resource Technical Report prepared by Galvin Preservation Associates Inc. (GPA) in 2017 (GPA 2017). These reports are included in Appendix F and Appendix G, respectively, to this PEIR.

5.7.1 Existing Conditions

5.7.1.1 Historic Background

Ethnographic

The BASASP area is located within the traditional territory of the Kumeyaay people. The Kumeyaay of the prehistoric and contact periods were a group of exogamous, patrilineal territorial bands who inhabited San Diego County from Agua Hedionda Lagoon in Carlsbad south into Baja California and from the Pacific Ocean east to the Salton Sea (Gifford 1918). The Kumeyaay language is from the Yuman branch of the Hokan linguistic family. They subsisted on a hunting and foraging economy, exploiting San Diego's diverse ecology throughout the year; coastal bands exploited marine resources while inland bands might move from the desert, ripe with agave and small game, to the

acorn and pine nut rich mountains in the fall (Kroeber 1925; Luomala 1978; Cline 1984). Maintaining this lifestyle meant most groups, especially inland bands, moved with the seasons; this is displayed archaeologically by the prevalence of temporary campsites inland while more permanent village sites are located along the coast. The ethnohistoric village site known as *La Rinconada de Jamo* is partially within the BASASP area.

For people intimate with their physical surroundings, the landscape is a place with many attributes beyond simple physical description. The Kumeyaay have roots that extend thousands of years in the area that is now San Diego County and northern Baja California, and there are hundreds of words that describe a given landform, showing a close connection with nature. There are also stories associated with the land. The San Diego area in general, including the BASASP area, and the City as it existed as late as the 1920s, was known as qapai (meaning uncertain). Some native speakers referred to what is now I-8 as oon-ya, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast. The floodplain from the San Diego Mission to the ocean was hajir or qajir (Harrington 1925, 1927).

Prehistoric

The prehistory of the BASASP area and the San Diego region can generally be divided into three major periods: Paleoindian (also referred to as the San Dieguito complex), Archaic (or the La Jolla and Pauma complexes), and Late Prehistoric (or Cuyamaca complex).

San Dieguito Complex (10,000 to 7,000 Before Present [B.P.]

The earliest accepted archaeological manifestation of Native Americans in the San Diego area is the San Dieguito complex, dating to approximately 10,000 years ago. The San Dieguito complex is chronologically equivalent to other Paleoindian complexes across North America, and sites are sometimes called "Paleoindian" rather than "San Dieguito." The material culture of the San Dieguito complex consists primarily of scrapers, scraper planes, choppers, large blades, and large projectile points. Crescentic stones are considered to be characteristic of the San Dieguito complex as well. Tools and debitage made of fine-grained green metavolcanic material, locally known as felsite, were found at many sites identified as San Dieguito. Often these artifacts were heavily patinated. Felsite tools, especially patinated felsite, came to be seen as an indicator of the San Dieguito complex. Many archaeologists have felt that the San Dieguito culture lacked milling technology and saw this as an important difference between the San Dieguito and La Jolla complexes. Sleeping circles, trail shrines, and rock alignments have also been associated with early San Dieguito sites.

La Jolla and Pauma Complexes (7,000 to 1,500 B.P.)

The traditional view of San Diego prehistory has the San Dieguito complex followed by the La Jolla complex at least 7,000 years ago, possibly as long as 9,000 years ago. The La Jolla complex is part of the Encinitas tradition and equates with the Millingstone Horizon, also known as Early Archaic or Milling Archaic. The Encinitas tradition is generally recognized by millingstone assemblages in shell middens, often near sloughs and lagoons. Crude cobble tools, especially choppers and scrapers, characterize the La Jolla complex. Basin metates, manos, discoids, a small number of Pinto series and Elko series points, and flexed burials are also characteristic.

Some archaeologists propose that the La Jolla complex developed with the arrival of a desert people on the coast who quickly adapted to their new environment. Others have suggested an in situ development of the La Jolla people from the San Dieguito or a Pleistocene migration of an ancestral stage of the La Jolla people to the San Diego coast.

Various authors have proposed that the San Dieguito, La Jolla, and Pauma complexes are manifestations of the same culture, with differing site types explained by site location, resources exploited, influence, innovation, and adaptation to a rich coastal region over a long period of time. The classic “La Jolla” assemblage is one adapted to life on the coast and appears to continue through time. Inland sites adapted to hunting contain a different tool kit, regardless of temporal period. Other archaeologists argue that an apparent overlap among assemblages identified as “La Jolla,” “Pauma,” or “San Dieguito” does not preclude the existence of an Early Milling period culture in the San Diego region, separate from an earlier culture.

Cuyamaca Complex (1,500 B.P. to 1769)

The Late Prehistoric period is represented by the Cuyamaca complex in the southern portion of San Diego County and the San Luis Rey complex in the northern portion of the county. The Cuyamaca complex is the archaeological manifestation of the Yuman forebears of the Kumeyaay people. The San Luis Rey complex represents the Shoshonean predecessors of the ethnohistoric Luiseño. The name Luiseño derives from Mission San Luis Rey de Francia and has been used to refer to the Indian people associated with that mission, while the Kumeyaay people are also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcalá). Agua Hedionda Creek is often described as the division between the territories of the Luiseño and the Kumeyaay people. Elements of the Cuyamaca and San Luis Rey complexes include small, pressure-flaked projectile points (e.g., Cottonwood and Desert Side-notched series); milling implements, including mortars and pestles; Olivella shell beads; ceramic vessels; and pictographs.

Historic

There are three general eras in California history: the Spanish Colonial, Mexican, and American periods.

The Spanish Period (1769 to 1821)

While Juan Rodriguez Cabrillo visited San Diego briefly in 1542, the beginning of the historic period in the San Diego area is generally given as 1769. It was that year that the Royal Presidio of San Diego was founded on a hill overlooking Mission Valley. The Mission San Diego de Alcalá was constructed in its current location five years later. The Spanish Colonial period lasted until 1821 and was characterized by religious and military institutions bringing Spanish culture to the area and attempting to convert the Native American population to Christianity. Mission San Diego was the first mission founded in southern California. Mission San Luis Rey in Oceanside was founded in 1798. *Asistencias* (chapels) were established at Pala (1816) and Santa Ysabel (1818).

The Mexican Period (1821 to 1848)

The Mexican period lasted from 1821, when California became part of Mexico, to 1848, when Mexico ceded California to the United States under the treaty of Guadalupe Hidalgo at the end of the

Mexican-American War. Following secularization of the missions in 1834, mission lands were given as large land grants, called ranchos, to Mexican citizens as rewards for service to the government. The society made a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. The Pueblo of San Diego was established during this period, and transportation routes were expanded. Cattle ranching prevailed over agricultural activities.

The American Period (1848 to the Present)

The American period began in 1848, when California was ceded to the United States. The territory became a state in 1850, and the Americanization of the area developed rapidly. Alonzo Horton's development of New Town San Diego in the modern downtown area focused development away from Old Town San Diego in the second half of the nineteenth century. The project area was sparsely developed until after World War II. Large portions of land were subdivided as early as the late 1800s and early 1900s, and a small village began to form around the San Diego College of Letters, which was established in 1887; however, based on aerial photographs, development of the project area did not begin in earnest until the early 1950s. Following the bombing at Pearl Harbor, Pacific Beach's proximity to the coast made it a prime location for military encampments, increasing the population by more than 500 percent. Then, in 1945, a \$2 million bond issue was passed in order to improve Mission Bay. Mission Bay would eventually become Mission Bay Park, a huge draw for development and tourism in the coming decades. The rate of development continued to progress throughout the twentieth century and by the early 1980s, the area was almost completely built-out.

The area within the project boundaries is densely developed, and includes residential, commercial, and industrial properties. Much of the commercial development is poised to benefit from the nearby interstate and variety of recreational activities. Businesses include fast-food restaurants, gas stations, hotels, and motels that can serve travelers and visitors. Industrial development is generally located east of I-5, farther away from the beach and recreational areas, and consists of light manufacturing and municipal, storage, and office facilities. Residential properties are all remnants of post-war development, primarily small-scale single-family homes, with some instances of multi-family properties such as apartment buildings or bungalow courts. The infrastructure in the area is contemporary and fully-developed, with wide, asphalt-paved streets, concrete sidewalks, curbs, and gutters, and contemporary fluorescent street lights.

5.7.1.2 Historical Resources

Historic Buildings, Structures, Objects, or Sites

To determine the potential presence of historic properties in the BASASP area, SCIC records search data, the City's Historical Resources Register, the California Register of Historic Resources (CRHR), the California Historical Landmarks (CHL) list, California Historical Points of Interest list, and the NRHP were reviewed. There are no historic properties within the BASASP area listed on the City's Historic Landmarks List, the CRHR, the CHL list, California Historical Points of Interest list, or the NRHP. The Kate O. Sessions Nursery Site (San Diego HRB No. 31; California Historical Landmark No. 764) is located near the BASASP area, but outside the boundaries. While the nursery site no longer exists, the marker is located on the northwest corner of Garnet Avenue and Pico Street, on the west side of Rose Creek.

Research and a field survey were also conducted by architectural historians in February 2016 to identify properties within the BASASP that were 45 years of age or older, retained integrity, had not been previously evaluated, and had a demonstrable potential for significance. Properties that met these criteria were evaluated for historic resource potential, and included the following four properties:

- **Trade Winds Motel:** This property at 4305 Mission Bay Drive is a small-scale motel located on the northeast corner of Mission Bay Drive and Rosewood Street at the south end of the BASASP area. The L-shaped motel was completed in 1953 with references to the Mid-Century Modern and Ranch styles, which were popular at the time. The north wing of the L-shape is one story in height, while the east wing of the L-shape is two stories in height. The entire building is covered in a flat roof with a shallow overhang and boxed eaves. The motel is arranged in the northeast corner of the parcel. Signage for the motel is at the southwest corner of the lot. One sign, supported by two metal posts, simply reads “MOTEL” along a horizontal piece of metal. Below this there is another, smaller sign shaped like a palm tree that reads, “TRADE WINDS.” The smaller sign is supported by a curved metal post with banding that mimics a palm tree trunk.
- **Pacific Telephone and Telegraph Balboa Garage:** This property at 4565 Mission Bay Drive is a large telecommunications building located on Garnet Avenue, between its intersection with Mission Bay Drive and I-5. The generally rectangular building was completed in 1954 and features design elements of the Late Moderne style. The building varies in height; the northwestern portion of the building is two stories, while the remainder of the building is one story. The building is quite simple and has very few openings, which is characteristic of a telecommunications building of this type. The building takes up about half of its lot to the west, while the eastern half comprises a flat, asphalt parking lot.
- **Motel San Diego:** This property at 4780 Mission Bay Drive is a small-scale motel and motor court located on Mission Bay Drive, west of I-5 and just south of Damon Avenue. The U-shaped motel was completed in 1947 with Ranch style elements. The motel is primarily one story, with a second story apartment near the center of the building.
- **Casa de Figueroa:** This property at 2618-2626 Figueroa Boulevard is a multi-family residence located on Figueroa Boulevard, south of Garnet Avenue, and just east of the Rose Creek Trail. The apartment building was completed in 1952 with Mission Revival style elements. The property is characterized by its front wall that encloses an interior courtyard. The building consists of a two-story wing at the rear of the property with two, one-story wings at the front of the property, forming a U-shape around the interior courtyard. The apartment building is arranged to the rear of its lot, and the front of the property is paved with concrete to form a tenant parking area.

These four properties were evaluated under the NRHP, CRHR, and the City’s Historical Resource Guidelines (HRG) to determine whether the buildings qualified as historic (see Appendix F for full evaluations). All four buildings, with the exception of the Trade Winds Hotel sign, were determined to lack significant historical and architectural associations, and therefore do not appear to be eligible for listing in the NHRP or CRHR. The Trade Winds Hotel sign is potentially eligible as a City Historic Landmark under local Criteria A and C for its association with the postwar period of development in the Pacific Beach area and its distinctive design. Its location, orientation towards a major road, programmatic

shape, bright colors, and exterior neon tubing embody the type of signage used to attract passing motorists in the postwar era.

One additional property within the BASASP area was identified as a potential historic resource. The Chase Bank building at Mission Bay Drive was constructed in 1977 and is therefore outside the 45-year threshold for potential historic resources. However, it features intact mural mosaics by noted artist Millard Sheets depicting the history of San Diego. As such, this bank has the potential to be considered a historic resource once sufficient time has passed to adequately evaluate it. It would potentially be eligible for listing under Criterion C for its high artistic value and embodiment of a property type.

Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

To determine the potential presence of archaeological resources in the BASASP area, records search data from the South Coastal Information Center (SCIC) at San Diego State University for previous projects in the vicinity were obtained. This information supplemented in-house records from SCIC and the San Diego Museum of Man for the BASASP area and within a one-mile radius. A pedestrian survey of exposed ground surface was also conducted by HELIX and Red Tail Monitoring and Research in April 2016.

Numerous cultural resource investigations have been conducted within the vicinity of the BASASP, including a number of studies covering portions of the BASASP area. These include surveys, testing and data recovery excavations, an indexing program associated with preservation of a portion of P-37-005017 (CA-SDI-5017), and monitoring projects. Three cultural resources have been recorded within the one-mile search radius (see Table 5.6.1, *Previously Recorded Resources Within One Mile of the BASASP Area*), two of which are located within the BASASP area; the other is on Crown Point approximately 0.75 mile to the southwest.

The entire BASASP area west of I-5 is within the mapped area of P-37-005017 (CA-SDI-5017; SDM-W-150/152), the ethnohistoric village of La Rinconada de Jamo (or Rinconada). This is a large and significant archaeological site that has been subject to vast disturbance over many years of ranching, road construction, and residential and commercial development. The village was called Rinconada (Spanish for “corner”) by Gaspár de Portolá and his party in July 1769. Mission records give the Spanish names of Rincon and Rinconada for the village, as well as the Kumeyaay names Jamio, Japmo, and Jamo.

Archaeological site P-37-005017 (CA-SDI-005017) meets eligibility Criterion (d) of the National Register of Historic Places (NRHP) because previous research has demonstrated that the site has yielded, and has the potential to yield important and significant information about the region’s history and prehistory. The site also contains important California Indian values, as it was occupied for approximately 3,000 years up to the time of Spanish settlement in the area. Based on these evaluations, P-37-005017 is a significant cultural resource under CEQA and the City’s Historical Resources Guidelines. Though in a disturbed and developed area, midden deposits with human remains and associated artifacts such as shellfish remains, ground stone, flaked stone, shell and bone ornaments have been discovered.

The other site recorded within the BASASP area is P-37-026978 (CA-SDI-17659), which included one isolate and a small scatter of historic domestic refuse. Cultural material recovered ranged in age

from the 1910s through the 1950s. In no case was there a single grouping by age determination; rather, the age of artifacts at the site was a range of ages indicative of incidental discards over a long period of time. The earliest materials are of a type that had a long period of use and may not be indicative of the deposition period. For this reason, P-37-026978 (CA-SDI-17659) is not a significant cultural resource.

**Table 5.7-1
PREVIOUSLY RECORDED RESOURCES WITHIN ONE MILE OF THE BASASP AREA**

Resource Number (P-37-#)	Resource Number (CA-SDI-#)	Description	Significance
005017*	5017*	Ethnohistoric village of Rinconada, includes areas of deep midden deposits with human remains, shellfish remains, ground stone, flaked stone, shell, and bone ornaments	Significant
011571	11571	Recorded as slough margin intermittent camping; marine shell and lithic artifacts (mainly debitage)	Not significant
026978*	17659*	An isolated artifact and a small scatter of historic domestic refuse ranging in age from the 1910s through the 1950s	Not significant

Source: HELIX 2018d

*Resource previously mapped within, or partially within, the BASASP area.

Tribal Cultural Resources

In accordance with the provisions of Senate Bill 18 (SB 18), and as part of the background research for the BASASP, a Sacred Lands File and Native American Contacts List Request was submitted to the NAHC on April 12, 2016 which did not identify any Native American cultural resources. Letters were then sent to the contacts listed provided by the NAHC on April 20, 2016 to gather additional information; however, no responses were received. In January 2018 a subsequent notice was distributed to all culturally affiliated California Native American tribes identified by the NAHC of the opportunity to consult with the City of San Diego for the purpose of preserving, or mitigating impacts to, cultural places located on land within the City's jurisdiction that is affected by the proposed BASASP within the Pacific Beach and Clairemont Mesa Community Planning areas. One letter was received from the Campo Band of Mission Indians requesting consultation to discuss some of their concerns. This consultation is currently in the process of being scheduled, and once complete, applicable information will be included in the Final PEIR. Correspondence was also received from the Jamul Indian Village regarding the project. In this case, however, information was provided to the tribal representative that the BASASP scope had been recently discussed during the AB 52 consultation meeting in November 2017, and as such, no further consultation was requested under SB 18.

As noted above under the archaeological resources discussion, previous research within, and immediately adjacent to the BASASP area has resulted in the recovery of artifacts which can also be attributed to the ethnohistoric Kumeyaay village of La Rinconada de Jamo. Along with the material cultural left behind in the archaeological record, intact and disturbed Native American human remains have been encountered during a variety of construction-related activities. As such, because

the entire area west of I-5 is within the known ethnohistoric Kumeyaay village site of La Rinconada de Jamo, there is a potential for tribal cultural resources, including human remains and associated burial goods, to be encountered during construction-related activities implemented in accordance with the BASASP.

In accordance with the provisions of Assembly Bill 52 (AB 52), notification was sent to the Jamul Indian Village and the Lipay Nation of Santa Ysabel in October 2017 regarding environmental review for the BASASP. Although no response was received within the proscribed timeframe, information about the BASASP project scope, records search results and proposed mitigation framework for subsequent project review was presented at the monthly tribal consultation meeting in November 2017. The City's programmatic approach to future "project-level" environmental review was discussed, including assurance that AB 52 consultation would be implemented during project specific environmental review when known resources are present or a potential exists for resources to be encountered. All concurred and consultation was concluded.

5.7.2 Regulatory Framework

5.7.2.1 Federal

National Historic Preservation Act of 1966 and the National Register of Historic Places

Federal criteria are those used to determine eligibility for the NRHP. The NRHP was established by the National Historic Preservation Act (1966). The NRHP is the official lists of sites, buildings, structures, districts, and objects significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the National Park Service. Nominations to the NRHP may come from the various State Historic Preservation Offices, Tribal Historic Preservation Offices, local governments, and from private individuals and organizations. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in 36 CFR 60. A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and where such resources:

- A. Are associated with events that have made a significant contribution to the broad patterns of our history;
- B. Are associated with the lives of persons important in our past;
- C. Embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15065.5), as well.

Native American Involvement

Native American involvement in the development review process is addressed when an undertaking under federal law triggers environmental review pursuant to the National Environmental Policy Act (NEPA). This often occurs when a project is funded by a federal agency or is being proposed by a federal agency and requires review under Section 106 of the National Historic Preservation Act. The Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of project evaluation.

5.7.2.2 State

California Register of Historic Resources/California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one which qualifies for the California Register of Historical Resources (CRHR) or is listed in a local historic register or deemed significant in a historical resource survey, as provided under PRC Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the CRHR, is not included in a local register of historic resources, or is not deemed significant in a historical resource survey may nonetheless be historically significant deemed significant by a CEQA lead agency (CEQA Guidelines Section 15064.5 and CEQA Statutes Section 21083.2).

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria are those listed in CEQA and used to determine whether an historic resource qualifies for the CRHR. A resource may be listed in the CRHR if it is significant at the federal, state, or local level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States;
2. Is associated with the lives of persons important to the nation or to California's past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

As indicated above, the California criteria (CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

CEQA was amended in 1998 to define “historical resources” as a resource listed in or determined eligible for listing on the CRHR; a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements; and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant.

The City’s determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines. Archaeological resources are considered “historical resources” for the purposes of CEQA. Most archaeological sites which qualify for the CRHR do so under criterion 4 (i.e., research potential).

Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance would be determined if they are affected by a development proposal. The significance of a historical resource under criterion 4 rests on its ability to address important research questions.

Native American Burials (Public Resources Code Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (2001), like the federal act (NAGPRA), ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and applicable local regulations.

Senate Bill 18

Native American involvement in the development review process is addressed by several state laws. The most notable of the state laws is SB 18, which includes detailed requirements for local agencies to consult with identified California Native American tribes early in the planning and/or development process.

Assembly Bill 52

AB 52 (Chapter 532, Statutes of 2014) was passed on September 25, 2014, and applies to all projects that file a NOP, or Notice of Intent to Adopt a negative declaration, mitigated negative declaration or EIR, on or after July 1, 2015. The bill requires that a lead agency begin consultation with a California Native American tribe that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency, prior to the determination of whether a negative declaration, mitigated negative declaration, or EIR will be prepared. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

AB 52 codified this consultation process within the CEQA statute (PRC Section 20174). It also defines tribal cultural resources as either of the following:

- 1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.7.2.3 Local

City of San Diego General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan sets a series of goals for the City for the preservation of historic resources. The first of these goals is to preserve significant historical resources. These goals would be realized through implementation of policies that encourage the identification and preservation of historical resources. Specific policies are shown in Table 5.7-2, *General Plan Historic Preservation Element Policies*.

Table 5.7-2
GENERAL PLAN HISTORIC PRESERVATION ELEMENT POLICIES

Policy	Description
HP-A.1	Strengthen historic preservation planning.
HP-A.2	Fully integrate the consideration of historical and cultural resources in the larger land use planning process.
HP-A.3	Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.
HP-A.4	Actively pursue a program to identify, document, and evaluate the historical and cultural resources in the City of San Diego.
HP-A.5	Designate and preserve significant historical and cultural resources for current and future generations.
HP-B.1	Foster greater public participation and education in historical and cultural resources.
HP-B.2	Promote the maintenance, restoration, and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.
HP-B.3	Develop a historic preservation sponsorship program.
HP-B.4	Increase opportunities for cultural heritage tourism. Additional discussion and policies can be found in the Economic Prosperity Element, Section I.

Source: City 2008a

City of San Diego Historical Resources Regulations

In January 2000, the City's Historical Resources Regulations (or Regulations), part of the SDMC (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and Section 106 of the NHPA of 1966. Included in these are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use.

Historical Resources Guidelines (or Guidelines) are incorporated in the San Diego LDC Land Development Manual (Manual) by reference. These Guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Regulations and the determination of impacts and mitigation under CEQA.

Compliance with the Regulations begins with the determination of the need for a site-specific survey for a project. Section 143.0212(b) of the Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or prehistoric archaeological sites. These maps are based on records maintained by the South Coastal Information Center (SCIC) at San Diego State University (SDSU) of the CHRIS and the San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

The need for a survey is based on historical resource information and the date and results of any previous surveys of a project site. Archaeological surveys are required if more than five years have elapsed since the last survey and the potential for archaeological resources exists. A historic property (built environment) survey is required if the structure/site is over 45 years old; may meet one or more criteria for designation; and appears to have integrity of setting, design, materials, workmanship, feeling, and association. Surveys must be conducted according to criteria in the Guidelines. If the survey results are negative, the review process is complete and no mitigation is required.

Historical resources, in the regulatory context, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city.

These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use (City 2001).

In addition to direct and indirect impacts, cumulative impacts must also be addressed during the CEQA review process. Cumulative impacts are a result of individually minor but collectively significant projects occurring over a period of time. Data recovery may be considered a cumulative impact due to the loss of a portion of the resource data base. Cumulative impacts also occur in districts when several minor changes to contributing properties, their setting, or landscaping eventually results in a significant loss of integrity (City 2001)

City of San Diego Historical Resources Guidelines/Historical Register

The City's Guidelines, amended in April 2001 are designed to implement the Regulations contained in Chapter 14, Division 3, Article 2 of the LDC. If any resources have been recorded on the property, those resources must be evaluated for significance/importance in accordance with the Guidelines.

As compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Guidelines, "Any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated as historic by the City Historical Resources Board if it meets any of the following criteria":

- A. Exemplifies or reflects special elements of the City's, a community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- B. Is identified with persons or events significant in local, state, or national history;
- C. Embodies distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman;
- E. Is listed on or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the California OHP for listing on the State Register of Historical Resources; or
- F. Is a finite group of resources related to one another in a clearly distinguishable way; or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value; or which represent one or more architectural periods or styles in the history and development of the City.

Historical resources determined to be significant/important must either be avoided or for archaeological resources, a data recovery program for important archaeological sites must be developed and approved prior to permit issuance in order to assure adequate mitigation for the recovery of cultural and scientific information related to the resource's significance/importance.

5.7.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's CEQA Significance Determination Thresholds (City 2016a), consist first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation.

Based on the City's CEQA Significance Determination Thresholds, which have been adopted to guide a programmatic assessment of the project, impacts related to historical resources would be significant if the proposed BASASP would result in any of the following:

1. 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, or object or site;
2. A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries ;
3. A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. The City of San Diego's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code, although even a resource that is not listed in or determined eligible for listing in the CRHR, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process.

Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A to the City's Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50-square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage

complexity; cultural affiliation; association with an important person or event; and ethnic importance.

- The determination of significance for historic buildings, structures, objects, and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.
- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

The following impact analysis addresses thresholds of significance determine potentially significant impacts, and includes mitigation measures to reduce impacts to historical and tribal cultural resources. The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for project-level historical resources evaluation/analysis criteria, and when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; tribal cultural resources; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines through a subsequent project review process. The mitigation measures described in the impact discussion below (HIST-1 and HIST-2) provide a framework that would be required of all development projects with the potential to impact significant historical resources.

5.7.4 Issue 1: Historic Buildings, Structures, Objects, or Sites

Would the proposed BASASP result in the alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, or object or site?

5.7.4.1 Impacts

Individual Local Historic Resources

Based on the study conducted by GPA Consulting (2017) and previous studies in and around the BASASP area, three potential historic resources have been identified within the BASASP area and its immediate vicinity, including the Kate O. Sessions Nursery site, the Trade Winds Motel sign, and the Chase Bank building. Potential impacts to these resources resulting from implementation of the BASASP are discussed below.

Kate O. Sessions Nursery Site

A commemorative plaque for the Kate O. Sessions Nursery located on the northwest corner of Garnet Avenue and Pico Street in Pacific Beach was registered as a California State Historical Landmark in 1961. Although considered a historic resource, it is located outside of the BASASP boundary, and thus no impacts would occur to this designated historic resource.

Trade Winds Motel Sign

The Trade Winds Motel Sign is located at 4305 Mission Bay Drive, which is within the BASASP area. The sign is potentially eligible as a City Historic Landmark under local Criteria A and C. Significant impacts could occur to the sign if the BASASP implementation results in the demolition, destruction, relocation, or alteration of the sign, thereby impairing its historical significance.

Chase Bank Building

The Chase Bank building is located at 4646 Mission Bay Drive, which is within the BASASP area. The building is currently less than 45 years old (40 years old), but may be eligible as a historic resource under Criterion C for its high artistic value associated with artist Millard Sheets ~~once it reaches the 45-year threshold~~. sufficient time has passed to adequately evaluate it under local or State designation criteria. Because implementation of the BASASP is likely to take more than five years, this building could ~~become eligible~~ become of sufficient age to evaluate significance during BASASP implementation, and therefore can be considered a future potential historical resource during the horizon of the BASASP. Significant impacts could occur if subsequent projects under the BASASP would result in the demolition, destruction, relocation, or alteration of the building and its murals.

5.7.4.2 Significance of Impacts

Implementation of the project could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan or current zoning. These impacts would be significant.

5.7.4.3 Mitigation Framework

Historic Buildings Structures, Objects, or Sites

Implementation of the following mitigation measure would reduce impacts to historic buildings structures, objects, or sites.

HIST-1: Historic Buildings, Structures, Objects and Sites

Prior to issuance of any permit for a development project implemented in accordance with the project that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Historical Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- a. Conducting a Historic American Building Survey (HABS) and Historic American Engineering Record (HAER);

- b. Preparing a historic resource management plan;
- c. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- d. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- e. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource;
- f. Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning; and
- g. Removing industrial pollution at the source of production.

Specific types of historical resource reports, outlined in Section III of the HRG, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

5.7.4.4 Significance After Mitigation

Historic Buildings, Structures, Objects, or Sites

Development implemented in accordance with the proposed BASASP that would potentially result in impacts to significant historic buildings, structures, objects, or sites would be required to implement Mitigation Measure HIST-1, adopted in conjunction with certification of this PEIR, and consistent with existing requirements of the Historic Resources Regulations and Historical Resources Guidelines. The mitigation framework combined with the policies in the General Plan promoting the identification and preservation of historical resources and adopted community plan policies would reduce the program-level impact related to historical resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, potential impacts to historic buildings, structures, objects, or sites, would remain significant and unavoidable.

5.7.5 Issue 2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Would the proposed BASASP result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?

5.7.5.1 Significance of Impact

According to the Cultural Resources Study prepared by HELIX (March 2018), three archaeological resources have been recorded within the one-mile search radius (see Table 5.6.1, *Previously Recorded Resources Within One Mile of the BASASP Area*) conducted for the project. Specifically, the entire BASASP area west of I-5 is within the recorded site boundaries of P-37-005017 (CA-SDI-5017; SDM-W-150/152), the ethnohistoric village of La Rinconada de Jamo (or Rinconada). This is a large and significant archaeological site that has been subject to vast disturbance over many years of ranching, road construction, and residential and commercial development. Additionally, there is potential for subsurface prehistoric or historic archaeological resources to be encountered on the east side of I-5. Though in an area predominately developed and disturbed, subsequent development under the proposed BASASP has the potential to result in significant impacts to prehistoric or historic archaeological resources, sacred sites, and human remains, including, but not limited to, areas within and/or in proximity to the village of La Rinconada de Jamo.

5.7.5.2 Mitigation Framework

Prehistoric or Historic Archaeological Resources, Sacred Sites, and Human Remains

Implementation of the following mitigation measure would reduce impacts prehistoric or historic archaeological resources, Sacred Sites, and Human Remains.

HIST-2: Archaeological and Tribal Cultural Resources.

Prior to issuance of any permit for a future development project implemented in accordance with the BASASP area that could directly affect an archaeological or tribal cultural resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and

may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City's Guidelines must be performed by a qualified archaeologist.

Step 2:

Where a recorded archaeological site or Tribal Cultural Resource (as defined in the PRC) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to provisions in PRC 21080.3.1 and 21080.3.2, in accordance with AB 52. It should be noted that during the consultation process, tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource which could also be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative. This could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of

data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, will include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

Step 3:

Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American

tribal cultural resource or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California PRC Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California PRC (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the MMRP included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4:

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for ensuring research access to the collections consistent with state and federal standards unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., NAGPRA [U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations, Part 79. Additional information regarding curation is provided in Section II of the Guidelines.

5.7.5.3 Significance After Mitigation

Prehistoric or Historic Archaeological Resources, Sacred Sites, and Human Remains

Development implemented in accordance with the proposed project would potentially result in impacts to significant archaeological resources, and therefore would be required to implement Mitigation Measure HIST-2, which addresses measures to minimize impacts to archaeological resources. This mitigation, combined with the policies of the General Plan and the adopted community plan policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to prehistoric or historical archaeological resources. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts

to prehistoric and historic archaeological resources, sacred sites, and human remains would be minimized but would remain significant and unavoidable.

5.7.6 Issue 3: Tribal Cultural Resources

Would the proposed BASASP result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- 1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,*
- 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

5.7.6.1 Impacts

As stated in Section 5.7.1.2, a Sacred Lands check was conducted which indicated that no sacred lands have been identified within the vicinity of the project area. However, based on the archaeological records search results, several key areas have been identified in the BASASP area that have a high level of interest to the local Native American community which have not been formally recognized or listed on a local, state or federal register.

As such, for subsequent projects implemented in accordance with the proposed BASASP where a recorded archaeological site or Tribal Cultural Resource, as defined in the Public Resources Code (PRC) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant of the provisions of PRC Section 21080.3.1 and 21080.3.2 in accordance with AB 52. Results of the consultation process.

5.7.6.2 Significance of Impacts

Given the presence of known and potential tribal cultural resources within and immediately adjacent to the BASASP, future development implemented in accordance with the BASASP would potentially result in impacts to significant tribal cultural resources, and therefore would be required to implement Mitigation Framework HIST-2, which addresses measures to minimize impacts to archaeological and tribal cultural resources. This mitigation, combined with the policies of the General Plan and the adopted community plan policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to prehistoric or historical archaeological resources. However, even with application of the existing regulatory

framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to tribal cultural resources, would be minimized but would remain significant and unavoidable.

5.7.6.3 Significance After Mitigation

Implementation of Mitigation Measure HIST-2, combined with the policies of the General Plan and the adopted community plan policies promoting the identification, protection, and preservation of archaeological and tribal cultural resources, in addition to compliance with CEQA and PRC Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations (Municipal Code Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to tribal cultural resources. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to tribal cultural resources, would be minimized but would remain significant and unavoidable.

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5.8 Human Health/Public Safety/Hazardous Materials

This section describes the potential human health and public safety issues related to the presence of hazardous materials and other hazards within the BASASP area, identifies pertinent regulatory standards, and evaluates potential impacts and associated mitigation requirements related to implementation of the proposed project.

5.8.1 Existing Conditions

5.8.1.1 Database Search Results

A review of the state agency databases for hazardous materials and waste facilities was conducted in October 2017 to determine if there are potentially hazardous conditions within or near the BASASP area that could present a health hazard. Specifically, the Department of Toxic Substances Control (DTSC) Envirostor and the State Water Resources Control Board (SWRCB) Geotracker websites were reviewed to determine the presence of sites that require cleanup or sites that involve unregulated hazardous materials. The results of the database searches are summarized below in Table 5.8-1, *Overview of Hazardous Sites within the BASASP Area*, and are identified on Figure 5.8-1, *Hazardous Sites within the BASASP Area*. As shown, the results of the database searches revealed that five sites are either open or their status is unknown. While there are additional sites within the BASASP area where hazardous materials or Underground Storage Tanks (USTs) have contributed to unauthorized releases necessitating clean up, there are no other known open or unresolved cases within the BASASP area. A brief overview of the five open or unknown status sites and the cleanup status for each of these sites is provided below.

**Table 5.8-1
OVERVIEW OF HAZARDOUS SITES WITHIN THE BASASP AREA**

# ¹	Name	Address	Status
1	Dry Cleaner Empire of America	2701 Garnet Avenue	Refer to Local Agency (e.g., County DEH SAM Program)
2	AT&T California	2825 Garnet Avenue	Regulated site for hazardous materials storage
3	Guy Hill Cadillac	4275 Mission Bay Drive	Open – Site Assessment
4	Chevron	4409 Mission Bay Drive	Open – Remediation
5	Mission Bay Property	4606 Mission Bay Drive	Open – Site Assessment

Source: DTSC 2017

¹ The number corresponds to those identified on Figure 5.8-1.

Dry Cleaner Empire of America

The Dry Cleaner Empire of America site at 2701 Garnet Avenue is identified as a DTSC Cleanup Site just east of Bond Street. The listed status of the site states “Refer: 1248 Local Agency,” which means that the San Diego County DEH SAM Program can supervise site cleanup efforts per SB 1248, which allows local agencies to manage cleanup sites for simple waste releases, such as a dry cleaner site. According to San Diego County DEH SAM Program personnel, the address is believed to be incorrectly plotted as there are no SAM Program sites listed at 2701 Garnet Avenue (County 2017). Also, a closed SAM Program site was recorded at 2710 Garnet Avenue, and is similarly labeled Dry

Clean Empire of America (note the difference between “Cleaner” and “Clean” in the two names). Because the status of a dry-cleaning business listed at 2701 Garnet Avenue refers to the County DEH SAM Program for cleanup, and the County DEH SAM Program does not have any records of an open SAM case at this site, it is presumed that there is no open hazardous release site at 2701 Garnet Avenue and no further investigation or evaluation is necessary.

AT&T California

The AT&T California site at 2825 Garnet Avenue includes an active commercial building that is permitted to conduct and store some hazardous materials, including USTs, diesel fuel in an Aboveground Storage Tank (AST), a portable generator, and lead acid batteries (California 2017). These activities are regularly monitored by the California Environmental Reporting System (CERS), and the business at this site is required to complete a Hazardous Materials Business Plan (HMBP) to be certified by CERS on an annual basis. The HMBP includes the location and type of each hazardous material and emergency and response plans and procedures in the event of an accidental release or potential threat of a release.

Guy Hill Cadillac

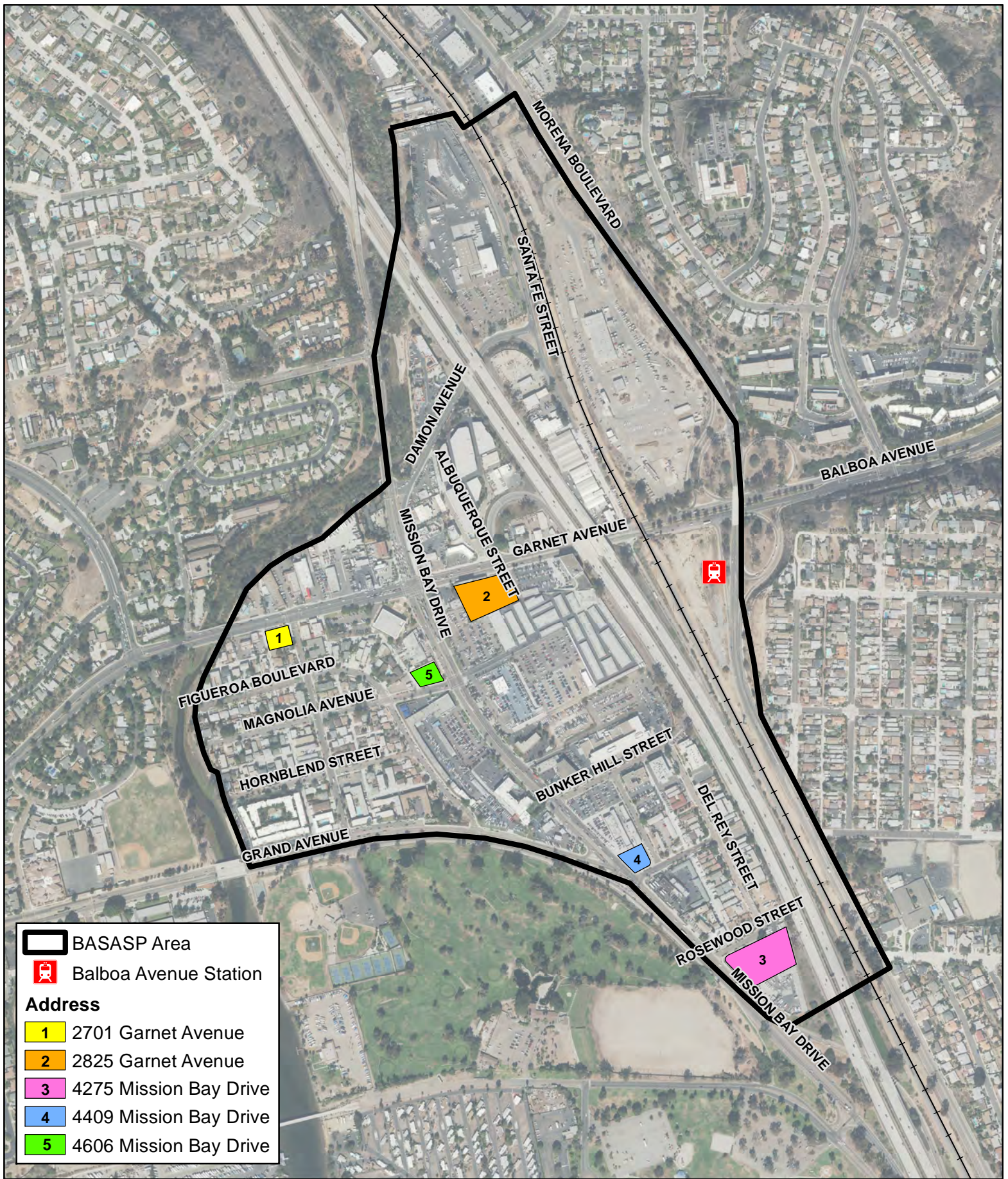
The Guy Hill Cadillac site, located at 4275 Mission Bay Drive between I-5 and Mission Bay Drive, was previously used as a car sales and repair site. Hydraulic lift systems (including hydraulic hoists, steel reservoir tanks, and associated piping) were removed in early 2017 with oversight from the San Diego County Department of Environmental Health (DEH) Site Assessment and Management (SAM) Program staff. A Soil and Groundwater Management Plan (SGMP) and a Community Health and Safety Plan (CHSP) were prepared in July 2017 to address the potential to encounter residual petroleum hydrocarbon contaminants associated with future soil excavation and site preparation (Terracon 2017). Specifically, the SGMP addresses notification and pre-excavation requirements, dust controls, contingency measures and spill reporting, management of excavated soils, and groundwater management. The CHSP addresses vapors, dust, noise, fuel storage, site security and traffic safety, and includes best management practices (BMPs) to address potential public hazards that could occur due to the presence of hazardous materials at the site.

Chevron

The Chevron site, located at 4409 Mission Bay Drive, north of the intersection of Glendora Street and Mission Bay Drive, is a used car dealership and was previously a commercial gas station. Previous unauthorized releases were reported in 1993 and site remediation efforts included excavation of 110 to 250 tons of contaminated soils in 1999; however, no active soil remediation has occurred. Since 2000, five groundwater monitoring wells have reported water quality conditions semi-annually. While the case has not formally been closed, the San Diego DEH SAM Program staff and the SWRCB recommended that the case be closed through the Low-Threat Closure Policy (LTCP) process based upon the results of its trend analysis evaluation (SWRCB 2017b).

Mission Bay Property

The Mission Bay Property is located at 4606 Mission Bay Drive, northwest of the intersection of Magnolia Avenue and Mission Bay Drive, and contains a vacant commercial building. Historic uses at the site included operation of a gas station from at least 1953 until 1970 and there is no



Balboa Avenue Station Area Specific Plan

Hazardous Sites within the BASASP Area

0 750 1,500
Feet



Figure 5.8-1

documentation of the removal of the former gas station's USTs or subsurface investigations to determine if hazardous materials currently exist. In 2015, petroleum hydrocarbons were detected in soil and groundwater at the site and additional coordination, including development of a work plan, was approved by San Diego DEH SAM Program staff in 2016. In accordance with the work plan, six soil gas probes and three monitoring wells were installed in April 2016, followed by the installation of two additional monitoring wells in April 2017. The results of the investigations at the Mission Bay Property were summarized in a September 2017 Downgradient Site Assessment Report. Soil contamination was concluded to be at or below residual saturation levels and groundwater contamination was concluded to not represent a significant community health risk. As a result, site closure was recommended through the LTCP process; however, the site has not formally been closed (TRC 2017).

5.8.1.2 Other Potentially Hazardous Materials

- Aerially-deposited Lead. Local freeways, including I-5, may contain soils with aerially-deposited lead derived from vehicular exhaust emissions prior to the elimination of leaded gasoline in the mid-1980s.
- Electrical Transformers. A number of pad- and pole-mounted transformers are present within the BASASP area, with these facilities (depending on their age) potentially containing polychlorinated biphenyl (PCB) dielectric fluids.
- Building Materials. Asbestos insulation and other hazardous building materials (e.g., lead-based paint) may be present in structures within the BASASP area built prior to the mid- to late 1970s when the use of such substances was largely discontinued.

5.8.1.3 Flood-related Hazards

Federal Emergency Management Agency 100-year Floodplains

As mentioned in the geotechnical study (Allied Geotechnical Engineers, Inc. 2016) prepared for the proposed project, the BASASP area has been mapped for flood hazards by the Federal Emergency Management Agency (FEMA). Within the BASASP area, mapped 100-year floodplains are within the Rose Creek floodplain, and the area is designated as within Zone AE. Zone AE is defined as a floodplain area (channel of a stream) and adjacent floodplain areas with a one percent annual chance of flooding (Allied Geotechnical Engineers, Inc. 2016).

Tsunami- ~~or~~ and Seiche-related Flood Hazards

Based on the analysis provided in Section 5.5, *Geology and Soils*, the BASASP area is not subject to flooding or inundation related to tsunamis or seiches, due to considerations including the site location (approximately 2.25 miles inland and outside of the State's Tsunami Inundation Map for Emergency Planning) and the fact that the BASASP area is not located in proximity to water features capable of generating substantial seiche-related hazards.

Dam Inundation

None of the BASASP area is within mapped inundation areas and the nearest reservoir is Lake Murray, located approximately 10 miles east of the BASASP area.

5.8.1.4 Aircraft-related Hazards

There are no airports located within or adjacent to the BASASP area, and it is not expected that regulatory/notification requirements would be required. The nearest airports to the BASASP area include Montgomery Field, approximately four miles to the east, and Marine Corps Air Station Miramar, approximately five miles to the northeast. The BASASP area is not located within the Airport Influence Area, a Safety Zone, or Federal Aviation Administration notification area associated with these airports (Airport Land Use Commission 2010 and 2011).

5.8.1.5 Emergency Response and Evacuation Plans

Emergency Response Plans

The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MHMP), a countywide plan to identify risks and minimize damage from natural and man-made disasters (County 2010). The primary goals of the Plan include efforts to promote and provide compliance with applicable regulatory requirements (including through the promulgation/enhancement of local requirements), increase public awareness and understanding of hazard-related issues, and foster inter-jurisdictional coordination.

The San Diego Office of Homeland Security (SD-OHS) oversees the City Homeland Security, Disaster Preparedness, Emergency Management, and Recovery/Mitigation Programs. The primary focus of this effort is to ensure comprehensive emergency preparedness, training, response, recovery, and mitigation services for disaster-related effects. The SD-OHS also maintains the City Emergency Operations Center (EOC) and an alternate EOC in a ready-to-activate status, ensures that assigned staff are fully trained and capable of carrying out their responsibilities during activations, and manages the EOC during responses to multi-department and citywide emergencies to support incident response activities and maintain citywide response capabilities (County 2010).

Emergency Evacuation Plans

The City is also a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP; County of San Diego 2014), which addresses emergency issues including evacuation. Specifically, Annex Q (Evacuation) of the Plan notes that: "Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County..., " with I-5 identified as a primary evacuation route in the BASASP area vicinity.

Wildfire Hazards

Almost the entire BASASP area is urbanized, with a generally low potential for wildfire hazards. However, some areas, particularly within the northern portion of BASASP area (generally north of Garnet Avenue and Balboa Avenue), are located within a mapped "very high risk fire severity zone"

(City 2009). Specifically, this very high fire hazard severity zone is associated with Rose Canyon, which occurs near the northern boundary of the BASASP area.

5.8.2 Regulatory Framework

5.8.2.1 Federal

Resource Conservation and Recovery Act of 1976

Federal hazardous waste laws are largely promulgated under the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations [CFR] Title 40, Part 260), as amended by the Hazardous and Solid Waste Amendments of 1984 (which are primarily intended to prevent releases from large underground storage tanks [LUSTs]). These laws provide for the “cradle to grave” regulation of hazardous wastes. Specifically, under RCRA, any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. The USEPA has the primary responsibility for implementing RCRA, although individual states can obtain authorization to implement some or all RCRA provisions.

Hazardous Material Transportation Act

The U.S. Department of Transportation (USDOT) regulates hazardous materials transportation under Title 49 CFR, which requires the USDOT Office of Hazardous Materials Safety to generate regulations for the safe transportation of hazardous materials.

Comprehensive Environmental Response, Compensation, and Liability Act

The 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, provides federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Federal actions related to CERCLA are limited to sites on the National Priorities List (NPL) for cleanup activities, with NPL listings based on the USEPA Hazard Ranking System (HRS). The HRS is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of the hazardous material release, and the potential to affect people or environmental resources. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986 as outlined below.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act (SARA) is primarily intended to address the emergency management of accidental releases, and to establish state and local emergency planning committees responsible for collecting hazardous material inventory, handling, and transportation data. Specifically, under Title III of SARA, a nationwide emergency planning and response program established reporting requirements for businesses that store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. Title III of SARA also requires each state to implement a comprehensive system to inform federal authorities, local agencies, and the public when significant quantities of hazardous or acutely toxic substances are stored or handled at a facility. This data is made available to the community at large under the

“right-to-know” provision, with SARA also requiring annual reporting of continuous emissions and accidental releases of specified compounds.

5.8.2.2 State

California Code of Regulations

Most state and federal regulations and requirements that apply to generators of hazardous waste are codified in California Code of Regulations (CCR) Title 22, Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transportation, treatment, storage, and disposal facilities. Because California is a fully authorized state under RCRA, most RCRA regulations are integrated into Title 22. CalEPA / DTSC regulates hazardous waste more stringently than the USEPA through Title 22, which does not include as many exemptions or exclusions as the equivalent federal regulations. Similar to the California Health and Safety Code (as outlined below), Title 22 also regulates a wider range of waste types and waste management activities than RCRA. The State has compiled a number of additional regulations from various CCR titles related to hazardous materials, wastes, and toxics into CCR Title 26 (Toxics), and provides additional related guidance in Titles 23 (Waters) and 27 (Environmental Protection), although California hazardous waste regulations are still commonly referred to as Title 22.

Title 24 of the CCR provides a number of requirements related to fire safety, including applicable elements of Part 2, the California Building Code (CBC); Part 2.5, the California Residential Code (CRC); and Part 9, the California Fire Code (CFC). Specifically, CBC Chapter 7 (Fire and Smoke Protection Features) includes standards related to building materials, systems, and assembly methods to provide fire resistance and prevent the internal and external spreading of fire and smoke (such as the use of non-combustible materials and fire/ember/smoke barriers). CBC Chapter 9 (Fire Protection Systems) provides standards regarding when fire protection systems (such as alarms and automatic sprinklers) are required, as well as criteria for their design, installation, and operation. Section R327 of the CRC includes measures to identify Fire Hazard Severity Zones and assign agency responsibility (i.e., Federal, State, and Local Responsibility Areas, refer to the discussion below under California Department of Forestry and Fire Protection), and provides fire-related standards for building design, materials, and treatments. The CFC establishes minimum standards to safeguard public health and safety from hazards including fire in new and existing structures. Specifically, this includes requirements related to fire hazards from building use/occupancy (e.g., access for fire-fighting equipment/personnel and the provision of water supplies), the installation or alteration/removal of fire suppression or alarm systems, and the management of vegetative fuels and the provision of defensible space.

California Health and Safety Code

The CalEPA/DTSC has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code (CHSC) Section 25531, et seq., incorporates the requirements of SARA and the CAA as they pertain to hazardous materials. Under the California Accidental Release Prevention Program (CalARP, CHSC Section 25531 to 25545.3), certain businesses that store or handle more than 500 pounds, 55 gallons, or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management Plan (RMP) to the appropriate local authorities, the designated local administering agency, and the USEPA for review and approval. The RMP is intended to satisfy federal

“right-to-know” requirements and provide basic information to regulators and first responders, including identification/quantification of regulated substances used or stored on site, operational and safety mechanisms in place (including employee training), and potential on- and off-site consequences of release and emergency response provisions.

Under CHSC Sections 25500-25532, businesses handling or storing certain amounts of hazardous materials are required to prepare a Hazardous Materials Business Emergency Plan (HMBEP), which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. HMBEPs are also required to include a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material, and must be prepared prior to facility operation (with updates and amendments required for appropriate circumstances such as changes in business location, ownership, or operations).

Pursuant to CHSC Chapter 6.11, CalEPA established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated a number of existing state programs related to hazards and hazardous materials. The Unified Program also allows the designation of Certified Unified Program Agencies (CUPAs) to implement associated state regulations within their jurisdiction. For businesses within the City, applicable hazardous materials plans (such as RMPs and HMBEPs) are submitted to and approved by the San Diego County DEH/Hazardous Materials Division (HMD), which is the local CUPA as outlined below under County requirements.

Division 12 (Fires and Fire Protection) of the CHSC provides a number of standards related to fire protection methods, including requirements for the management of vegetation comprising a potential fire hazard under Part 5, Chapters 1 through 3.

Investigation and Cleanup of Contaminated Sites

The oversight of hazardous materials release sites often involves several different agencies that may have overlapping authority and jurisdiction. The DTSC and the Regional Water Quality Control Boards (RWQCBs) are the two primary state agencies responsible for issues pertaining to hazardous material release sites. Investigation and remediation activities that would involve potential disturbance or release of hazardous materials must comply with applicable federal, state, and local hazardous materials laws and regulations. DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. These regulations would be applied during grading activities if, for example, previously unknown underground tanks or other potential contaminant sources were uncovered.

Hazardous Materials Transportation

The California Highway Patrol (CHP) and Caltrans are the state agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. These agencies also govern permitting for hazardous materials transportation within the state.

California Department of Forestry and Fire Protection - State Responsibility Areas System

Legislative mandates passed in 1981 (SB 81) and 1982 (SB 1916) require the California Department of Forestry and Fire Protection (CAL FIRE) to develop and implement a system to rank fire hazards in California. Areas are rated as moderate, high, or very high based primarily on the assessment of different fuel types, with very high fire hazards identified in the northern portion of the BASASP area. CAL FIRE also identifies responsibility areas for fire protection, including federal, state, and local responsibility areas (FRAs, SRAs, and LRAs). The northern edge of the BASASP area is under City jurisdiction and, therefore, is within a LRA.

5.8.2.3 Local

County Standards

As noted above under State guidelines, the County DEH/HMD is the local CUPA, and has jurisdiction over hazardous materials plans in the City. The County DEH/HMD also requires businesses that handle reportable quantities of hazardous materials, hazardous wastes, or extremely hazardous substances to submit an HMBP, which includes detailed information on the storage of regulated substances. The County DEH/HMD provides guidelines for the preparation and implementation of HMBPs, including direction on submittal requirements, covered materials, inspections, and compliance.

The DEH/HMD is also the administering agency for the San Diego County Operational Area Hazardous Materials Area Plan (County 2011). This Plan identifies the system and procedures used within the County to address hazardous materials emergencies, and provides guidelines for topics such as transportation (including international crossings/inspections), industry/agency coordination, planning, training, public safety, and emergency response/evacuation.

The County Office of Emergency Services (OES) and Unified Disaster Council administer the MHMP, as outlined in Section 5.8.1.5. This Plan is generally intended to promote and provide a multi-jurisdictional approach to compliance with applicable regulatory requirements. The OES also administers the EOP (County 2014), which provides guidance for responding to major emergencies and disasters.

City Standards

The City Fire-Rescue Department implements the City Hazardous Materials Program (<http://www.sandiego.gov/fire/services/fireinspections/hazmat/>), which requires applicable uses/processes related to hazardous materials to provide disclosure through submittal of a Hazardous Material Information Form and acquisition of an associated permit. The Hazardous Materials Program also includes guidelines and requirements for topics such as education, code enforcement, and safe business practices related to hazardous processes and the use/storage of hazardous materials.

The City's Local Enforcement Agency (LEA) enforces state minimum standards on public and private solid waste services within the City, including waste collection/disposal, illegal solid waste dumping, and hazardous solid waste sites requiring remediation. The City's Environmental Services Department (ESD) carries out federal, state, and local waste management requirements, including

requirements in the California Public Resources Code (PRC), such as AB 939, AB 341, and AB 1862, as well as requirements in the Municipal Code, including the People's Ordinance (collection), the Recycling Ordinance, the Construction and Demolition Debris Ordinance, and the Storage Ordinance. The City's ESD also works to move the City toward compliance with its Zero Waste Plan, which is part of its Climate Action Plan (CAP).

The Municipal Code includes general hazardous materials regulations in Chapter 4 (Health and Sanitation), Sections 42.0801, 42.0901 (et seq.); and Chapter 5 (Public Safety, Morals and Welfare), Section 54.0701; as well as regulations regarding specific hazardous materials such as explosives (Chapter 5, Section 55.3301).

Chapter 14 (General Regulations) of the Municipal Code also includes requirements pertaining to fire hazard concerns, such as brush management (Section 142.0412), adequate fire flow (Section 144.0240), and construction materials for development near open space (Section 145.0701 et seq.).

5.8.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), as modified to reflect a programmatic analysis for the proposed BASASP, impacts related to human health/public safety/hazardous materials would be significant if implementation of the proposed BASASP would:

1. Expose people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in industrial areas);
2. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding related to mapped 100-year floodplains or failure of a dam or levee, as well as flooding/inundation from a tsunami or seiche;
3. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or
4. Expose people or structures to significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

5.8.4 Issue 1: Health Hazards

Would the proposed BASASP expose people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in industrial areas)?

5.8.4.1 Impacts

Based on the review of hazardous materials databases, there are four listed sites within the BASASP area that are in the process of completing site remediation efforts or that use hazardous materials on an ongoing basis (the fifth open site at 2701 Garnet Avenue is presumed to be an error as previously noted). Based on the locations of these sites shown on Figure 5.8-1 and the proposed BASASP land uses (refer also to Table 5.8-1), implementation of the proposed project could

potentially expose people or sensitive receptors to significant health hazards related to hazardous materials. Specifically, listed hazardous material sites shown on Figure 5.8-1 are located within areas with proposed uses that would include habitation or congregation of people or sensitive receptors, such as residential and commercial properties within the Community Village land use designations. In addition, the proposed project may retain the existing commercial use at 2825 Garnet Avenue (AT&T California) that use (or otherwise involve) hazardous materials in the vicinity of existing or proposed sensitive land uses (e.g., residential).

The transport of hazardous materials within and through the BASASP area may also occur in association with existing and proposed (as well as off-site) uses, and could potentially expose sensitive land uses to significant health hazards from accidental release.

All future development and redevelopment activities under the proposed project would be required to conform to applicable regulatory/industry and code standards related to health hazards from hazardous materials. Specifically, this would involve compliance with pertinent federal, state, and local standards related to hazardous materials as outlined in Section 5.8.2, including discretionary approval from the County DEH/HMD for all applicable projects proposed within the BASASP area. This would entail receipt of clearance from the County DEH/HMD as the local CUPA, including appropriate remediation efforts for applicable locations. Documentation of such clearance would be provided as part of the project-specific CEQA and/or Building Permit reviews, and would be a requirement for all project approvals. Based on the noted requirements for regulatory/industry conformance, potential impacts related to health hazards and hazardous materials from implementation of the proposed project would be less than significant.

5.8.4.2 Significance of Impacts

Potential impacts related to hazardous materials and associated health hazards from implementation of the proposed project would be avoided through mandatory conformance with applicable regulatory/industry standard and codes, including approval from the County DEH/HMD and other pertinent requirements as outlined in Section 5.8.2. For the five listed cases identified in Table 5.8-1, compliance with the SGMP and CHSP associated with the Guy Hill Cadillac site, and the HMBP associated with the AT&T California site, would be required for development at or adjacent to these sites. Closure has been recommended for the Chevron and Mission Bay Property, and it is believed that there are no open releases at the Dry Cleaner Empire of America. As a result, further compliance or remediation actions are not anticipated at these sites.

5.8.4.3 Mitigation Framework

Impacts would be less than significant, and therefore, no mitigation is required.

5.8.4.4 Significance After Mitigation

Impacts related to health hazards would be less than significant.

5.8.5 Issue 2: Flood Hazards

Would the proposed BASASP expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding related to mapped 100-year floodplains or failure of a dam or levee, as well as flooding/inundation from a tsunami or seiche?

5.8.5.1 Impacts

FEMA 100-year Floodplains

Mapped 100-year floodplains within the BASASP area are limited to portions along Rose Creek, located west of I-5, east of Mission Bay Drive, and north of Damon Avenue. Because this area is proposed as permanent Flood Control/Open Space under the BASASP, no associated flood-related impacts would result from implementation of the proposed project.

Tsunami- ~~and~~ Seiche-related Flood Hazards

Based on the discussion provided in Section 5.8.1, the BASASP area is not subject to flooding or inundation related to tsunamis or seiches due to considerations including the site location and elevation. As a result, no associated flood- or inundation-related impacts would result from implementation of the proposed project.

Dam Inundation

As stated above in Section 5.8.1, none of the BASASP area is within mapped inundation areas, and the nearest reservoir is Lake Murray, located approximately 10 miles east of the BASASP area. Therefore, no impacts related to dam inundation would occur.

5.8.5.2 Significance of Impacts

Potential impacts related to flood hazards from implementation of the proposed project would be less than significant, based on the following considerations: (1) no development within the BASASP area would occur within the 100-year floodplain; and (2) all proposed BASASP development is located outside of potential tsunami/seiche and dam inundation areas.

5.8.5.3 Mitigation Framework

Impacts would be less than significant, and therefore, no mitigation is required.

5.8.5.4 Significance After Mitigation

Impacts related to flood hazards would be less than significant.

5.8.6 Issue 3: Emergency Response and Evacuation Plans

Would the proposed BASASP impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

5.8.6.1 Impacts

Emergency Response Plans

As described in Section 5.8.1.5, the City is a participating agency in the MHMP (County 2010), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. As part of this effort, the City SD-OHS oversees emergency preparedness and response services for disaster-related measures, including administration of the City EOC and alternate EOC. There are no goals or objectives in the proposed BASASP that would interfere with or diminish the capacity of these programs and facilities to provide effective emergency response in the BASASP area or other areas. In addition, the proposed project would include circulation improvements such as modifying the I-5 northbound ramp to include a dual right-turn only with signal control at Balboa Avenue that would improve access capabilities for response vehicles and personnel in emergency scenarios. Based on the described conditions, as well as the fact that development proposed under the BASASP would be required to comply with applicable City emergency preparedness and response criteria under MHMP and SD-OHC guidelines, impacts related to interference with emergency response plans from implementation of the proposed project would be less than significant.

Emergency Evacuation Plans

Emergency evacuation planning criteria outlined in Section 5.8.1.5 under the EOP identifies I-5 as an emergency evacuation route in the vicinity of the BASASP area. There are no goals or objectives in the proposed BASASP that would affect the ability of these (or other) roadways to provide emergency evacuation capacity during natural or man-made disasters. Based on the described conditions, as well as the fact that development proposed under the BASASP would be required to comply with applicable City emergency evacuation criteria, impacts related to interference with emergency evacuation plans from implementation of the proposed project would be less than significant.

5.8.6.2 Significance of Impacts

Potential impacts related to impairment of or interference with adopted emergency response and evacuation plans from implementation of the proposed project would be less than significant, based on the nature of the proposed development and required compliance with associated criteria under the MHMP, SD-OHC, and EOP guidelines.

5.8.6.3 Mitigation Framework

Impacts would be less than significant, and therefore, no mitigation is required.

5.8.6.4 Significance After Mitigation

Impacts related to emergency response and evacuation plans would be less than significant.

5.8.7 Issue 4: Wildfire Hazards

Would the proposed BASASP expose people or structures to significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

5.8.7.1 Impacts

As described in Section 5.8.1, the BASASP area is urbanized with low potential for wildfire hazards with the exception of some of the northeastern corner of the BASASP area, which is identified as within the very high fire hazard severity zone. Implementation of development under the proposed BASASP within or adjacent to these areas could potentially result in significant impacts related to wildfire hazards. Implementation of the proposed project, however, would be subject to applicable State and City regulatory requirements related to fire hazards and prevention, as outlined in Section 5.8.2. Specifically, these encompass standards associated with vegetation (brush) management, such as selective removal/thinning and fire-resistant plantings to create appropriate buffer zones around development, as well as incorporating applicable fire-related design elements including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. These requirements would be implemented as part of individual project design elements under the proposed BASASP, and may entail the preparation of Fire Protection Plans and/or other technical analyses subject to CEQA environmental review. Based on the described regulatory requirements related to fire hazards and prevention, potential impacts associated with wildfire hazards from implementation of the proposed project would be less than significant.

5.8.7.2 Significance of Impacts

Potential impacts related to wildfire hazards from implementation of the proposed project would be less than significant, based on required compliance with applicable State and City standards associated with fire hazards and prevention.

5.8.7.3 Mitigation Framework

Impacts would be less than significant, and therefore, no mitigation is required.

5.8.7.4 Significance After Mitigation

Impacts related to wildfire hazards would be less than significant.

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5.9 Hydrology, Water Quality, and Drainage

The following analysis is based on the Infrastructure/ Water Quality Impact Assessment prepared by RRM Design Group. This technical report is included in its entirety as Appendix H of this PEIR. Secondary information is based on the Water Quality Control Plan for the San Diego Basin (Basin Plan) prepared by the San Diego Regional Water Quality Control Board (RWQCB) (1994, as amended through 2016) and the Mission Bay Watershed Management Area Water Quality Improvement Plan (2016) prepared by the City and Caltrans.

5.9.1 Existing Conditions

5.9.1.1 Surface Waters and Drainage

The BASASP area is mostly developed and is highly impervious (see Figure B-4 in City and Caltrans 2016). Nearly all rainfall can be expected to become runoff because of minimal opportunities for infiltration. Typical runoff response from highly impervious areas is flashy with high peak flow rates for short durations. Storm water runoff originating in the BASASP area is conveyed to receiving waters via streets, gutters, cross gutters, open channels, and other storm drain system components.

In general, storm water runoff from the BASASP area drains to Rose Creek along the western boundary of the BASASP area, which discharges to Mission Bay and ultimately to the Pacific Ocean. The BASASP area is located within the Rose Canyon Creek Subwatershed of the Mission Bay Watershed Management Area (WMA) (City and Caltrans 2016). The Mission Bay WMA encompasses approximately 64 square miles and includes three Hydrologic Areas (HAs): Scripps HA (906.30); Miramar HA (906.40), which contains the BASASP area; and Tecolote HA (906.50). Together with the Miramar Reservoir HA (906.10) and the Poway HA (906.20), the Mission Bay WMA forms the Peñasquitos Hydrologic Unit (HU) (906.00) (RWQCB 2016). Figure 5.9-1, *Watershed Management Areas and Hydrologic Areas*, shows the boundaries of these areas in relation to the BASASP area.

Water Quality

The BASASP area is mostly developed and is highly impervious. Because storm water runoff originating in the BASASP area is conveyed to the receiving water (i.e., Rose Creek) in streets, gutters, cross gutters, and other storm drain system components with little to no opportunity for infiltration, pollutants in runoff originating in the BASASP area are conveyed to the receiving water. The only exception would be storm water runoff from industrial sites that have implemented Best Management Practices (BMPs) required by the Industrial Storm Water General Permit or Waste Discharge Requirements (WDRs) issued by the San Diego RWQCB, or from development projects constructed after the City adopted its Storm Water Standards Manual in 2003. The Storm Water Standards Manual, which was most recently updated in ~~2016~~2018, requires certain development projects classified as “Priority Development Projects” to include permanent post-construction BMPs in the project design.

Current land uses in the BASASP area include a mixture of commercial, industrial, and residential uses. Typical pollutants that can be expected from these land uses include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides.

Beneficial Use Designations

Beneficial uses are the uses of water necessary for the survival or wellbeing of humans, plants, and wildlife. These water uses serve to promote the tangible and intangible economic, social, and environmental goals of humankind. The Basin Plan identifies beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground waters. The Basin Plan lists the following existing beneficial uses for Rose Creek: Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Warm Freshwater Habitat (WARM), and Wildlife Habitat (WILD). Industrial Service Supply (IND) is listed as a potential beneficial use for Rose Creek. Rose Creek is exempt from the Municipal and Domestic Supply (MUN) beneficial use, which means it is not subject to Drinking Water Policy (Resolution No. 88-63). The following beneficial uses are designated in the Basin Plan for Mission Bay: IND; Navigation (NAV); REC-1; REC-2; Commercial and Sport Fishing (COMM); Preservation of Biological Habitats of Special Significance (BIOL); Estuarine Habitat (EST); WILD; Rare, Threatened, or Endangered Species (RARE); Marine Habitat (MAR); Migration of Aquatic Organisms (MIGR); Spawning, Reproduction and/or Early Development (SPWN); and Shellfish Harvesting (SHELL). For the Pacific Ocean, the following beneficial uses are designated: IND, NAV, REC-1, REC-2, COMM, BIOL, WILD, RARE, MAR, Aquaculture (AQUA), MIGR, SPWN, and SHELL.

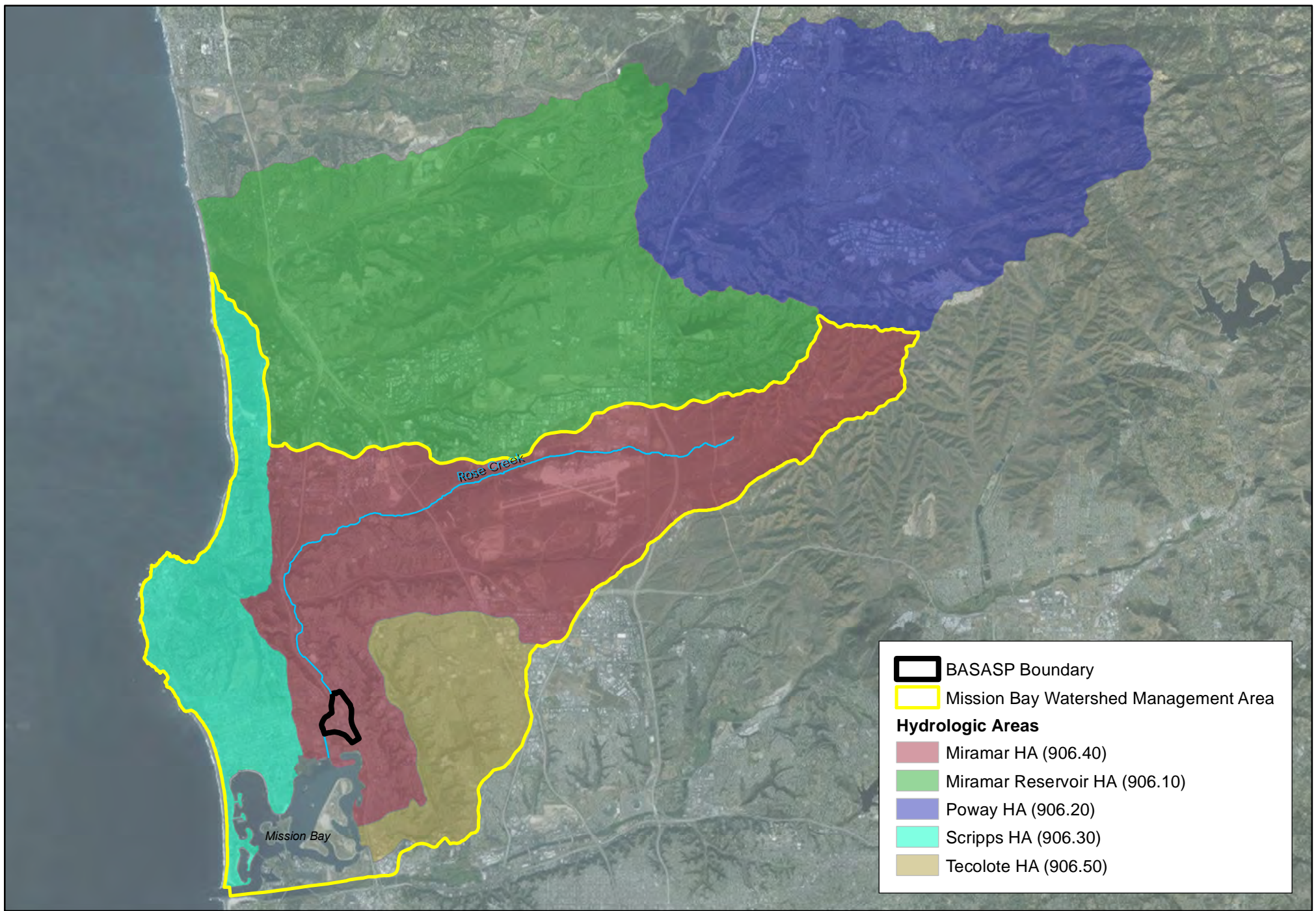
Clean Water Act Section 303(d) Impaired Water Bodies and Total Maximum Daily Loads

Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop a list of water quality limited segments. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region. Total Maximum Daily Loads (TMDLs) identify the total pollutant loading that receiving waters can receive and still meet water quality standards. The Regional Board is required to develop TMDLs or follow an alternative regulatory process to address 303(d) listed impairments.

The receiving waters for the BASASP area that are currently listed as impaired (based on the ~~2012~~2014 – 2016 303[d] List) include Rose Creek and Mission Bay (mouth of Rose Creek). The pollutants/stressors causing impairment of Rose Creek (north of Grand Avenue) are benthic community effects, selenium and toxicity. Currently, there are no adopted TMDLs that are being implemented for Rose Creek. The estimated TMDL completion date for pollutants and stressors in this section of the creek is 2021/~~2025~~. The pollutants/ stressors causing impairment of Mission Bay at the mouth of Rose Creek are eutrophic conditions and lead, with an estimated TMDL completion date of 2019. The pollutants/stressors causing impairment of Mission Bay Shoreline at multiple points around the bay include enterococcus, fecal coliform, and total coliform, with an estimated TMDL completion date of 2019. Potential sources for these surface water impairments are listed as unknown (SWRCB ~~2018~~2017a).

5.9.1.2 Groundwater

All major drainage basins in the San Diego region contain groundwater basins. The basins are relatively small in area and usually shallow. Although these groundwater basins are limited in size, the groundwater yield from the basins has been historically important to the development of the region. Nearly all of the local groundwater basins have been intensively developed for municipal and agricultural supply purposes.



Balboa Avenue Area Specific Plan

Watershed Management Area and Hydrologic Areas

Figure 5.9-1

Based on the Basin Plan, groundwater in the Miramar HA is exempt from the MUN beneficial use designation. There is a potential groundwater beneficial use for IND in the Miramar HA; however, this designation does not apply west of I-15 and therefore is not applicable to the BASASP area. There are no mapped groundwater basins within the BASASP area. The nearest groundwater basin is the Mission Valley Basin, which follows the alignment of the western reach of the San Diego River and terminates at the southern end of Mission Bay.

5.9.1.3 Flood Hazards

FEMA is involved in identifying and mapping flood-prone areas for jurisdictions that participate in the National Flood Insurance Program (NFIP). The City participates in the NFIP; therefore, maps delineating the 100-year storm floodplain within the City are available (FEMA 2017). The 100-year storm is defined as an event that has a one percent chance of occurring in any given year (i.e., rather than an event that occurs every 100 years).

FEMA Flood Zones within the BASASP area include Floodway Areas in Zone AE and Other Flood Areas (Zone X), shown on FEMA's Flood Insurance Rate Map (FIRM) Panel Numbers 06073C1612G, 06073C1611G, 06073C1603G, and 06073C1604G. Floodway Areas in Zone AE are considered Special Flood Hazard Areas (SFHAs) and include the channel of a stream plus any adjacent 100-year storm floodplain areas that must be kept free of encroachment so that the flood can be carried without substantial increases in flood heights. Zone X includes areas with a 0.2 percent annual chance (or 500-year) flood, areas within the 100-year floodplain with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from the 1 percent chance annual flood.

In the BASASP area, Floodway Areas in Zone AE are located along the Rose Creek corridor. Areas east of Rose Creek are mapped as Zone X. Boundaries of floodplains within the BASASP area are shown in Figure 5.9-2, *Floodplain Map*.

5.9.2 Regulatory Framework

This section discusses existing policies and regulations that apply to drainage, floodplain management, and water quality in the City. Future development projects in the BASASP area will be subject to requirements and design criteria outlined in these policies and regulations.

5.9.2.1 Federal

Clean Water Act

The CWA is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA. Section 401 of the CWA requires that an applicant for a federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of any pollutant, obtain certification from the State.

Pursuant to Section 402 of the CWA, the USEPA has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting programs and is responsible for developing waste discharge requirements. The San Diego RWQCB also is responsible for developing waste discharge requirements specific to its jurisdiction.

National Flood Insurance Program

The NFIP is a federal program enabling property owners in participating communities to purchase insurance protection against losses from flooding. In support of the NFIP, FEMA identifies flood hazard areas throughout the United States and its territories by producing Flood Hazard Boundary Maps (FHBMs), Flood Insurance Rate Maps (FIRMs), and Flood Boundary & Floodway Maps (FBFMs). Several areas of flood hazards are commonly identified on these maps, such as SFHAs (described above in Section 5.9.1.3). Development may take place within mapped SFHAs, provided that it complies with local floodplain management regulations, which must meet the minimum federal requirements.

The City is a participating community in the NFIP. Therefore, the City is responsible for adopting a floodplain management ordinance that meets certain minimum requirements intended to reduce future flood losses. The City has adopted Development Regulations for SFHAs in the Municipal Code Sections 143.0145 and 143.0146. If development is proposed within one of the SFHA Zones, these existing regulations will apply. The SFHA Zones within the BASASP area include areas mapped as Floodway Areas in Zone AE (refer to Figure 5.9-2).

5.9.2.2 State

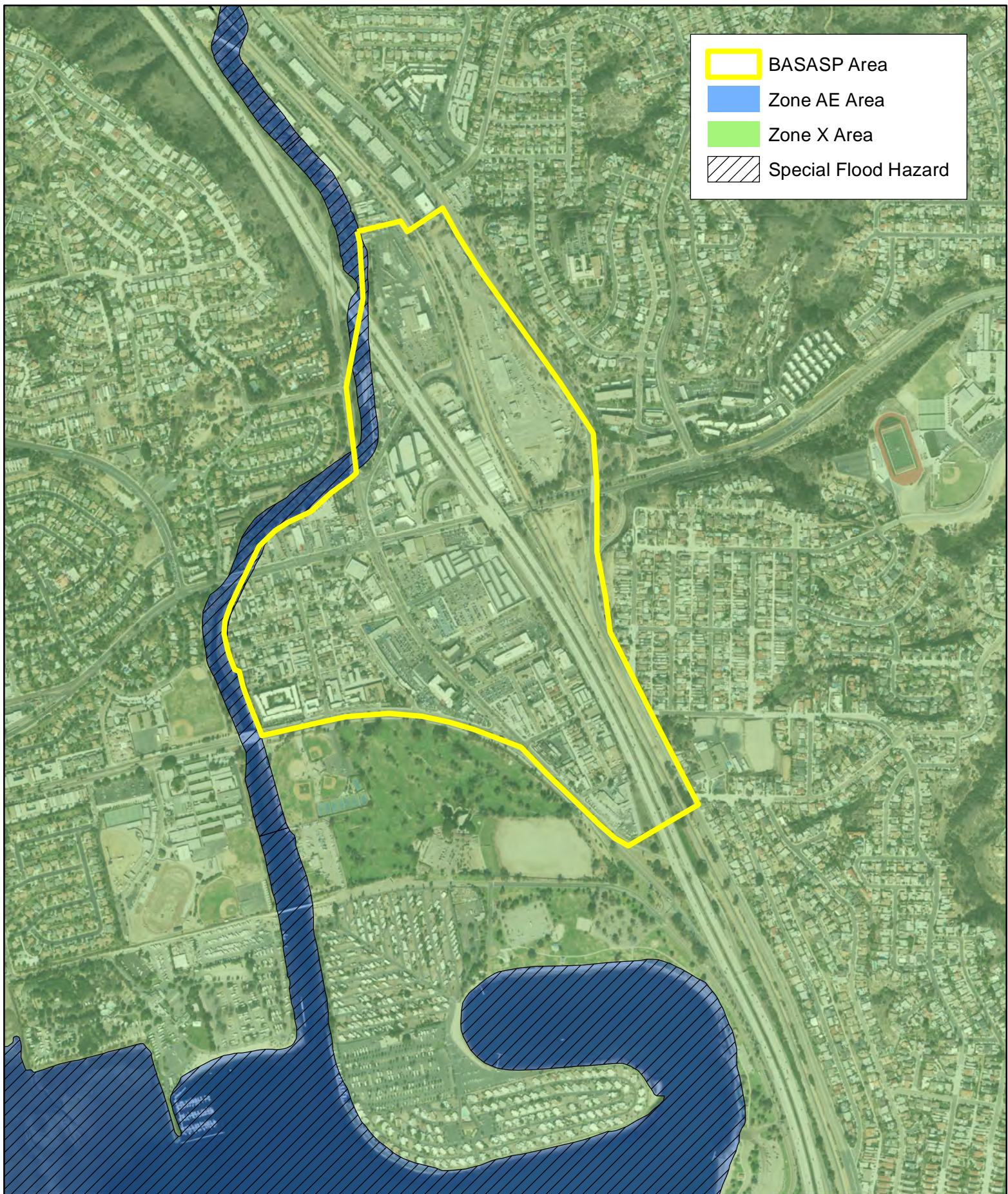
Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code, which authorizes the SWRCB to implement the provisions of the federal CWA.

The State is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Basin Plans that designate beneficial uses of California's major rivers and groundwater basins and establish water quality objectives for those waters.

NPDES Construction General Permit

SWRCB Order No. 2009-0009-DWQ, NPDES General Permit No. CAS000002 WDRs for Discharges of Storm Water Runoff Associated with Construction Activity (Construction General Permit) was adopted September 2, 2009 and amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ. The Construction General Permit is due to be reissued, which will likely occur several times during the life of the proposed project.



Balboa Avenue Station Area Specific Plan

Floodplain Map

Figure 5.9-2

Construction activities exceeding one acre (or meeting other applicable criteria) are subject to pertinent requirements under the Construction General Permit. Specific conformance requirements include implementing a Storm Water Pollution Prevention Plan (SWPPP), an associated Construction Site Monitoring Program (CSMP), employee training, and minimum BMPs, as well as a Rain Event Action Plan (REAP) for applicable projects (e.g., those in Risk Categories 2 or 3). Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., sediment erosion and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the off-site discharge of pollutants in storm water runoff. Depending on the risk level, these may include efforts such as minimizing/stabilizing disturbed areas, mandatory use of technology-based action levels, effluent and receiving water monitoring/reporting, and advanced treatment systems (ATS). Specific pollution control measures require the use of best available technology economically achievable (BAT) and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through applicable BMPs.

Site-specific measures would vary with conditions such as risk level, proposed grading, and slope/soil characteristics, and detailed guidance for construction-related BMPs is provided in the permit and in related City standards, as well as in additional sources including the *EPA National Menu of Best Management Practices for Storm Water Phase II – Construction* (USEPA 2016), and *Storm Water Best Management Practices Handbooks* (California Stormwater Quality Association [CASQA] 2009). Project-specific requirements for the BASASP area under this permit would be determined during SWPPP development, after completion of specific project plans and application submittal to the SWRCB.

NPDES Groundwater Permit

While there are no mapped groundwater basins within the BASASP area, exploratory borings conducted in the area between 2013 and 2016 encountered groundwater at depths of 2 to 24 feet bgs (AGE. 2016). If construction activities entail the discharge of extracted groundwater into receiving waters, the applicant would be required to obtain coverage under the Groundwater Permit (Order No. R9-2008-0002, NPDES No. CAG919002). Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharges to surface waters, estuaries, and the Pacific Ocean, with some exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include: (1) submittal of appropriate application materials and fees; (2) implementation of pertinent (depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

NPDES Municipal Permit

The most current Municipal Separate Storm Sewer Systems Permit (MS4 Permit) for Region 9, Order No. R9-2013-0001, was adopted on May 8, 2013 by the San Diego RWQCB and became effective on June 27, 2013. This Order was amended by adoption of Order No. R9-2015-0001 on February 11, 2015 and adoption of Order No. R9 2015-0100 on November 18, 2015. This is an update to the 2007 MS4 Permit, Order No. R9-2007-0001. Updated City of San Diego Storm Water Standards (based on

the Copermittees' Model BMP Design Manual) were adopted on February 16, 2016. Projects within the BASASP area would be subject to the most current MS4 Permit requirements.

The MS4 Permit implements a regional strategy for water quality and related concerns, and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include: (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities. MS4 Permit conformance entails considerations such as receiving water limitations, waste load allocations (WLAs), and numeric water quality based effluent limitations (WQBELs). Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable (MEP) involve methods such as: (1) using jurisdictional planning efforts (e.g., discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate BMPs, including LID measures, to avoid, minimize, and/or mitigate effects such as increased erosion and off-site sediment transport (sedimentation), hydromodification¹ and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City has implemented a number of regulations to ensure conformance with these requirements, as outlined below under local standards.

General Industrial Permit

Industrial facilities are subject to the requirements of SWRCB Water Quality Order No. 2014-0057-DWQ, NPDES Permit No. CAS000001, "Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities" (General Industrial Permit). This permit was adopted on April 1, 2014 and is scheduled to expire on June 30, 2020. This permit currently applies to operation of existing industrial facilities associated with 10 broad categories of industrial activities, and will apply to operation of proposed new industrial facilities within those 10 categories. The General Industrial Permit requires the implementation of storm water management measures and development of a SWPPP.

5.9.2.3 Local

Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major HUs, 54 HAs, and 147 Hydrologic Sub Areas (HSAs), extending from Laguna Beach southerly to the U.S.-Mexico border. Drainage from higher elevations in the east flows to the west, and ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing

¹ Hydromodification is generally defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (interception, infiltration, and overland/groundwater flow) caused by urbanization or other land use changes that result in increased stream flows and sediment transport.

and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

Drainage Design Manual

Pursuant to the Municipal Code Chapter 14 Article 2 Division 2, Storm Water Runoff and Drainage Regulations, drainage regulations apply to all development in the City, whether or not a permit or other approval is required.

Drainage design ~~policies and procedures~~ regulations for the City are given in the City's Drainage Design Manual, updated in January 2017. The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for developments within the City. Chapter 1 of the Drainage Design Manual outlines basic policies and objectives. Subsequent chapters provide design criteria. Future development projects in the BASASP area will be required to adhere to these existing criteria.

The City will be responsible for reviewing hydrologic and hydraulic studies and design features for conformance to criteria given in the Drainage Design Manual for every map or permit for which development approval is sought from the City.

Storm Water Standards Manual

The City updated its Storm Water Standards Manual in January 2016 to comply with the 2013 MS4 Permit and its 2015 amendments. The Storm Water Manual provides direction for associated regulatory compliance, including identification of construction and post-construction storm water requirements for Standard Projects and Priority Development Projects. Specifically, the manual identifies regulatory requirements and provides detailed performance standards and monitoring/maintenance efforts for: (1) construction BMPs; (2) overall storm water management design; (3) site design (LID) and source control BMPs applicable to all projects; (4) pollutant (or treatment) control and hydromodification management BMPs applicable to Priority Development Projects; (5) operation and maintenance requirements for applicable BMPs; and (6) specific direction and guidance to provide conformance with City and related NPDES storm water standards.

The updated City Storm Water Standards Manual Pollutant Control BMPs require Priority Development Projects to implement LID BMPs that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire). If retention BMPs are determined infeasible, then biofiltration BMPs may be allowed. Furthermore, if biofiltration BMPs are determined infeasible, then the Priority Development Projects may be allowed to use flow-thru treatment control BMPs, provided that an off-site alternative compliance project is available.

LID BMPs will be important to site planning because these features require on-site areas to retain storm water for infiltration, re-use, or evaporation. Although the footprint of the LID BMPs can often be fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features.

Jurisdictional Runoff Management Plan

The City's Jurisdictional Runoff Management Plan (JRMP) encompasses citywide programs and activities designed to prevent and reduce storm water pollution within the City's boundaries. The JRMP was adopted by the City on June 16, 2015, and updates were accepted by the San Diego RWQCB in 2017.

Grading Ordinance

The City Grading Ordinance (Municipal Code Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control storm water pollution from sources such as erosion/sedimentation and construction materials during project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

General Plan

The City's General Plan, adopted in 2008, provides a number of goals and policies related to hydrology and water quality concerns in the Public Facilities, Services, and Safety Element; and in the Conservation Element, as summarized below.

- Public Facilities, Services, and Safety Element. This element includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For storm water, these involve efforts to provide appropriately designed and sized infrastructure and ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the NPDES).
- Conservation Element. This element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources.

5.9.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), as modified to guide a programmatic analysis of the proposed BASASP, a significant hydrology/water quality impact would occur if implementation of the proposed BASASP would:

1. Result in substantial changes to infiltration rates, drainage patterns, or otherwise substantially alter the rate and/or volume of surface runoff;
2. Result in a substantial increase in pollutant discharges to receiving waters and/or substantial increases in discharges of identified pollutants to an already impaired water body; or
3. Otherwise impact local and regional water quality, including groundwater.

5.9.4 Issue 1: Runoff

Would the proposed BASASP result in substantial changes to infiltration rates, drainage patterns, or otherwise substantially alter the rate and/or volume of surface runoff?

5.9.4.1 Impacts

The BASASP area is highly developed with impervious surfaces; therefore, the rate and/or volume of runoff is not likely to be increased by new development. It is more likely that the volume and rate of runoff could be slightly decreased, and infiltration rates would slightly increase, due to storm water quality regulations which require implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual that would require the installation of LID practices such as bioretention (biofiltration) areas, cisterns, and/or rain barrels can be expected to improve surface drainage conditions, or at a minimum, to not exacerbate flooding or cause erosion.

In addition, the proposed BASASP contains policies to improve drainage patterns and decrease surface runoff. Policy 4.4.7 of the Urban Design chapter suggests incorporating storm water filtration features in bulb outs, which are planted areas that extend out from the sidewalk along the street. Policy 4.4.8 proposes using medians on Grand Avenue for storm water retention. Policy 4.4.9 encourages additional storm water features such as bioswales, pervious strips, flow-through planters, and pervious pavement. The Conservation chapter contains policies related to urban runoff management that encourage the incorporation and prioritization of LID practices and storm water BMPs (Policies 7.2.1 through 7.2.3). These policies support the installation of infrastructure to capture and minimize storm water runoff.

5.9.4.2 Significance of Impacts

Future development within the BASASP area would be subject to grading and drainage regulations in the Municipal Code and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the BASASP area would be reduced when compared to the existing condition. Thus, impacts related to surface runoff from implementation of the proposed project would be less than significant.

5.9.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation measures are required.

5.9.4.4 Significance After Mitigation

Impacts would be less than significant.

5.9.5 Issue 2: Pollutant Discharges

Would the proposed BASASP result in a substantial increase in pollutant discharges to receiving waters and/or substantial increases in discharges of identified pollutants to an already impaired water body?

5.9.5.1 Impacts

Because the BASASP area is highly impervious, the volume or rates of runoff are not likely to be increased by future development. It is more likely that the volume and rate of runoff could be slightly decreased due to storm water quality regulations which require implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation.

5.9.5.2 Significance of Impacts

Future development would be subject to grading and drainage regulations in the Municipal Code and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed area would be reduced when compared to the existing condition. Thus, impacts to runoff related to development within the BASASP area would be less than significant.

5.9.5.3 Mitigation Framework

Impacts related to the discharge of pollutants would be less than significant; therefore, no mitigation measures are required.

5.9.5.4 Significance After Mitigation

Impacts related to discharges of pollutants would be less than significant.

5.9.6 Issue 3: Other Water Quality Impacts

Would the proposed BASASP otherwise impact local and regional water quality, including groundwater?

5.9.6.1 Impacts

As discussed under Issues 1 and 2, the BASASP area is highly developed with impervious surfaces, and redevelopment within the area would not be expected to increase the rate and/or volume of runoff or related pollutant discharges.

5.9.6.2 Significance of Impacts

Adherence to storm water quality regulations, such as the City's Drainage Design Manual and Storm Water Standards Manual, would ensure that impacts related to water quality would be less than significant.

5.9.6.3 Mitigation Framework

Impacts related to water quality would be less than significant; therefore, no mitigation measures are required.

5.9.6.4 Significance After Mitigation

Impacts related to water quality would be less than significant.

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5.10 Noise

This section is based on the information and analysis presented in the Acoustical Analysis Report for the proposed project, dated April 2018 (HELIX 2018e). The technical report is included in its entirety as Appendix I.

5.10.1 Existing Conditions

5.10.1.1 Land Uses

Noise-Sensitive Land Uses

Noise-sensitive land uses (NSLUs) are land uses that may be subject to stress and/or interference from excessive noise, such as residential dwellings, hotels, dormitories, hospitals, educational facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to noise. NSLUs within the BASASP area include residences, hotels, and open space.

Vibration-Sensitive Land Uses

Land uses in which ground-borne vibration could potentially interfere with operations or equipment, such as research, manufacturing, hospitals, and university research operations (Caltrans 2013) are considered “vibration-sensitive.” The degree of sensitivity depends on the specific equipment and/or operations that would be affected by the ground-borne vibration. In addition, excessive levels of ground-borne vibration of either a regular or an intermittent nature can result in annoyance to residential uses. Vibration-sensitive land uses within the BASASP area include residential areas, research facilities, and hotels.

5.10.1.2 Noise Environment

All noise level or sound level values presented herein are expressed in terms of decibels (dB), with A-weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ} , with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and sound levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. This is similar to the Day Night sound level (L_{DN}), which is a 24-hour average with an added 10 dBA weighting on the same nighttime hours, but no added weighting on the evening hours. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and the enforcement of noise ordinances.

A community noise survey was conducted to document noise levels throughout the BASASP area. Short-term daytime measurements at nine locations were selected to be representative of typical conditions in the BASASP area. The short-term measurements show the average sound level over roughly 15-minute periods on a weekday in September 2017. The locations were chosen based on land uses and proximity to nearby roadways, and are shown in Figure 5.10-1, *Ambient Noise Survey*.

The community noise survey represents the existing conditions and provides a representation of baseline conditions in the study area. The sources of noise varied between sites, but the major source in most cases was vehicular traffic.

The measured average noise levels ranged from approximately 53 to 73 dBA L_{EQ} . The loudest average noise level was 72.8 dBA L_{EQ} . This measurement (Site 2) was located adjacent to Garnet Avenue, which runs perpendicular to I-5. A site measuring at 71.7 dBA L_{EQ} (Site 5) was located along Mission Bay Drive. Although these measurements provide a snapshot observation of the noise environment, noise can fluctuate widely throughout the day. Noise monitoring results are included in Table 5.10-1, *Noise Monitoring Results*.

Table 5.10-1
NOISE MONITORING RESULTS

Site	Location	Time	Measured Noise Level (dBA L_{EQ})
Site 1	Garnet Avenue east of Bond Street	11:31 a.m.- 11:41 a.m.	70.8
Site 2	Garnet Avenue west of I-5 SB Onramp	11:06 a.m. - 11:16 a.m.	72.8
Site 3	Mission Bay Drive north of Bunker Hill Street	9:25 a.m. - 9:35 a.m.	66.1
Site 4	3030 Bunker Hill Street Parking Lot	9:52 a.m. - 10:00 a.m.	65.2
Site 5	Mission Bay Drive at Rosewood Street	1:26 p.m. - 1:36 p.m.	71.7
Site 6	Grand Avenue at Bond Street	1:09 p.m. - 1:19 p.m.	69.5
Site 7	Figueria Boulevard west of Bond Street	11:53 a.m. - 12:01 p.m.	53.2
Site 8	North of Bond Street and Garnet Avenue	12:20 p.m. - 12:30 p.m.	53.3
Site 9	Glendora Street at Del Rey Street	1:40 pm. - 1:50 p.m.	61.3

Source: HELIX 2018e

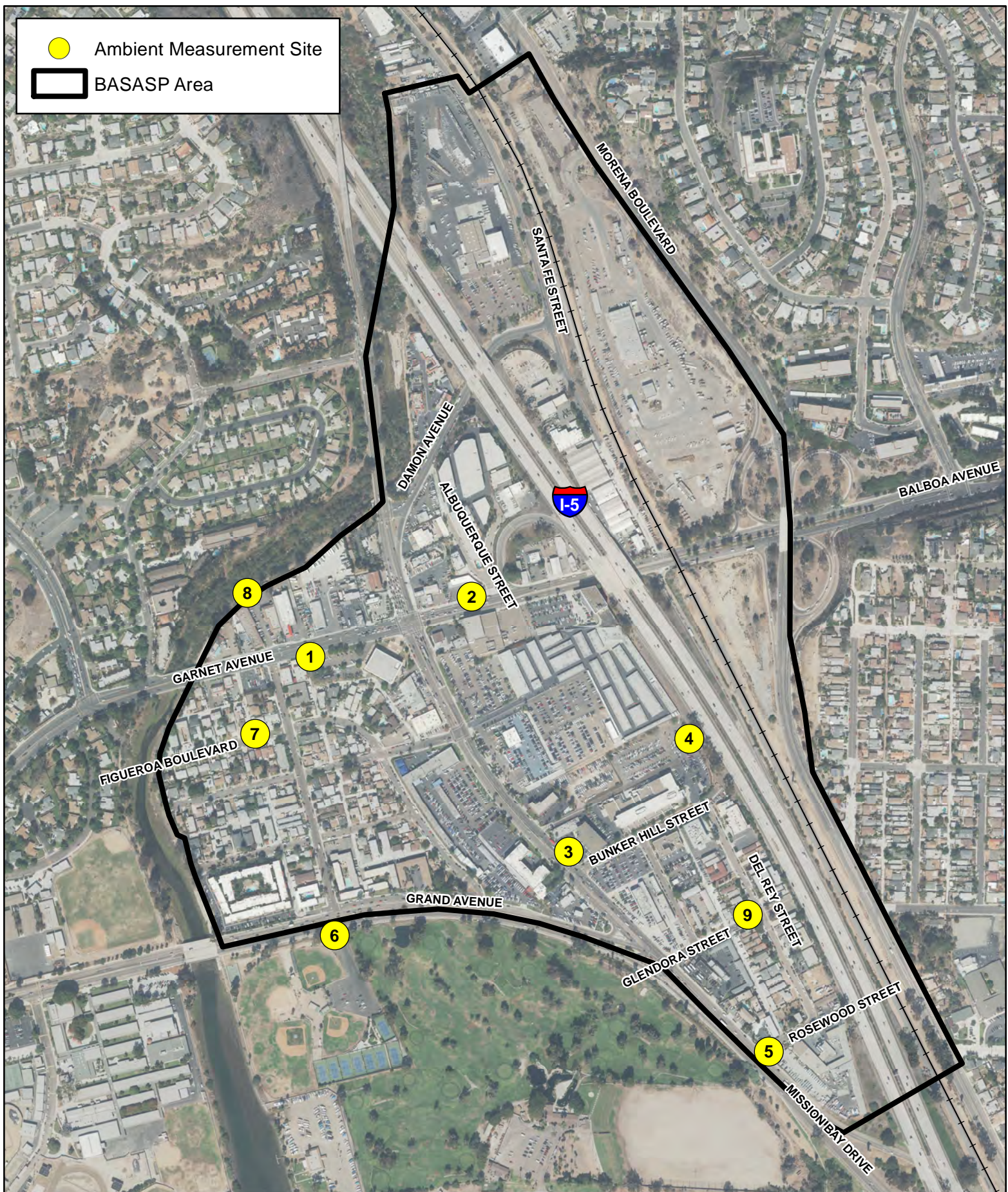
Note: All site measurements taken on September 19, 2017.

5.10.1.3 Transportation Noise

Mobile noise sources include vehicular traffic on freeways and local streets and rail activities. The combined noise levels generated by each of these mobile sources are illustrated in Figure 5.10-2, *Existing Transportation Noise Contours*. All noise contours depict the predicted noise level based on existing roadway and railway traffic levels and do not reflect attenuating effects of existing features such as noise barriers, buildings, topography, and dense vegetation.

Vehicular Traffic Noise

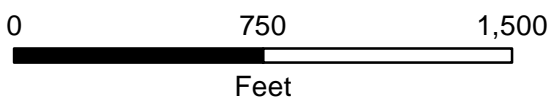
Traffic noise generated on a roadway is dependent on vehicle speed, volume, flow, percentage of vehicle types, properly functioning muffler systems, and pavement type and conditions. Traffic noise is also dependent on the presence of barriers and the distance between the noise source and receptor. In general, as traffic volumes increase, noise levels increase. This condition exists until

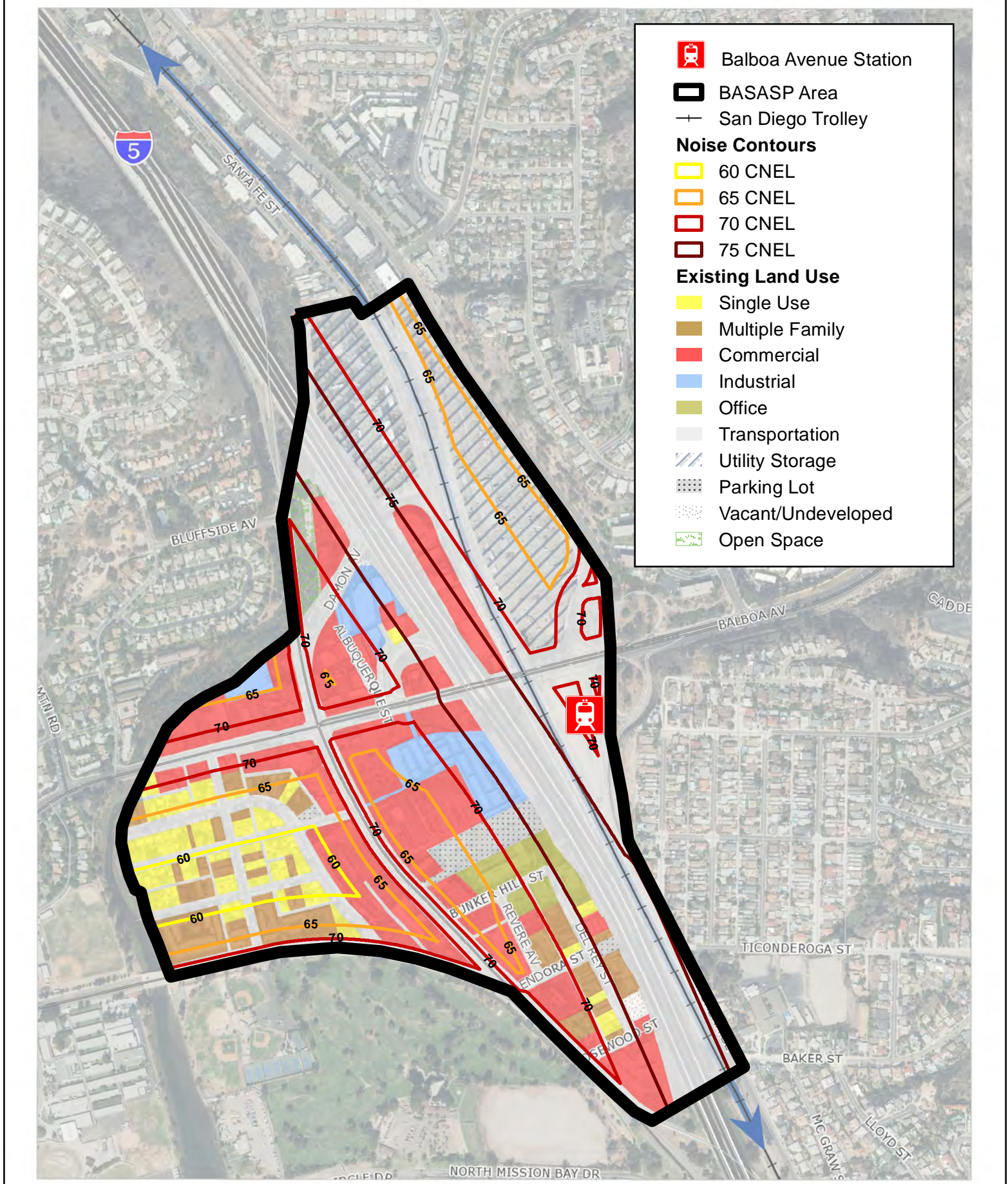


Balboa Avenue Station Area Specific Plan

Ambient Noise Survey

Figure 5.10-1





Balboa Avenue Station Area Specific Plan

Existing Transportation Noise Contours

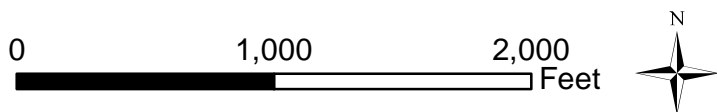


Figure 5.10-2

there is so much traffic that flow degrades and speeds decrease, which reduces noise levels. Furthermore, a heavy truck generates more noise than a car when travelling at the same speed and distance. Roads with the same amount of traffic can have higher or lower sound levels depending on the mixture of vehicles.

The roadway generating the greatest noise levels in the BASASP area is I-5. Within the BASASP area, major traffic noise generators are associated with Garnet Avenue, Balboa Avenue, Grand Avenue, Morena Boulevard, and Mission Bay Drive. The portions of the BASASP area currently affected by noise levels exceeding 65 CNEL are generally located adjacent to freeways and major roadways. In many areas along I-5, noise levels exceed 70 CNEL. Existing land uses in these areas include industrial, commercial, and open space. Residential uses are currently exposed to noise levels that exceed 65 CNEL along the I-5, Garnet Avenue, Grand Avenue, and Mission Bay Drive corridors, and include single- and multi-family residential development.

Rail Noise

Rail traffic on existing tracks generates elevated noise levels within the BASASP area. These tracks are located east of, and are roughly parallel to, I-5. They currently support the operation of Amtrak passenger trains, COASTER commuter trains operated by the North County Transit District (NCTD), and freight trains operated by Burlington Northern and Santa Fe (BNSF). Upon completion, the extension of the San Diego MTS Trolley Blue Line will also use the rail corridor through the BASASP area.

Passenger trains, freight trains, and light rail transit (LRT) vehicles generate high, relatively brief, intermittent noise events. Although there are no at-grade crossings with warning bells within the BASASP area, all trains and LRT vehicles are equipped with horns, whistles, and/or bells for use in emergency situations and as a general audible warning to alert people in the vicinity of the tracks. Sound level distances from future San Diego MTS Trolley service were derived from SANDAG's Noise and Vibration Impacts Technical Report for the Mid-Coast Corridor project (SANDAG 2014). Freight and passenger train noise levels were calculated based on Amtrak, COASTER, and freight train assumptions provided by the Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor Agency (LOSSAN 2012).

Stationary Noise

The BASASP area includes various stationary noise sources including industrial and commercial activities. Noise levels from stationary sources are highly localized and may vary during the day based on the specific activity being performed, atmospheric conditions, and other factors. These noise sources can be continuous, and may contain tonal components that may be annoying to people who live in the nearby vicinity. Stationary noise levels throughout the BASASP area may also vary due to different periods of activity depending on the time of day or day of the week.

5.10.2 Regulatory Framework

5.10.2.1 State

California Noise Control Act of 1973

Sections 46000 through 46080 of the California Health and Safety Code, known as the California Noise Control Act of 1973, find that excessive noise is a serious hazard to the public health and welfare, and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The Act also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The Act declares that the State has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Noise Insulation Standards (California Code of Regulations Title 24)

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multi-family residential buildings (California Building Standards Commission [CBSC] 2016a). Title 24 requires that residential structures be designed to prevent the intrusion of exterior noise so that the interior noise, with windows closed, attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room. The regulations also specify that acoustical studies must be prepared whenever a multi-family residential building or structure may be exposed to exterior noise levels of 60 dBA CNEL or greater. Such acoustical analysis must demonstrate that the residences have been designed to limit intruding noise to a maximum interior noise level of 45 dBA CNEL.

2016 California Green Building Standards Code (CALGreen)

Section 5.507 of the California Green Buildings Standards Code ([CALGreen] CBSC 2016b) establishes requirements for acoustical control in non-residential buildings. The standards require that wall and roof-ceiling assemblies making up the building envelope shall have a Sound Transmission Class (STC) value of at least 50, and exterior windows shall have a minimum STC of 40 or Outdoor-Indoor STC of 30 for buildings within: (1) the 65 CNEL noise contour of an airport; or (2) the 65 CNEL or L_{DN} noise contour of a freeway or expressway, railroad, industrial source, or fixed-guideway source. Wall and floor-ceiling assemblies separating tenant spaces and public places shall have an STC of at least 40. Additionally, Section A5.507.5 requires that classrooms have a maximum interior background noise level of no more than 45 dBA L_{EQ} .

5.10.2.2 Local

City of San Diego General Plan

The Noise Element of the General Plan includes the following policies intended to minimize noise through standards, site planning, and noise mitigation.

1. Policy NE-A.1: Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.

2. Policy NE-A.2: Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
3. Policy NE-A.3: Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
4. Policy NE-A.4: Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the proposed project design to meet the noise guidelines.
5. Policy NE-A.5: Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.

In addition, the Noise Element includes the Land Use – Noise Compatibility Guidelines which identify the limits for acceptable noise levels for different land use categories, as illustrated in Table 5.10-2, *City of San Diego Land Use – Noise Compatibility Guidelines*. Although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses exposed to exterior noise levels of up to the 70 dBA CNEL in areas affected primarily by motor vehicle noises with existing residential uses.

**TABLE 5.10-2
CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES¹**

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	<60	60-65	65-70	70-75	75+
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports; Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; K-12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges, and Universities)		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Apparel & Accessories			50	50	

**TABLE 5.10-2 (cont.)
CITY OF SAN DIEGO LAND USE-NOISE COMPATIBILITY GUIDELINES¹**

Land Use Category			Exterior Noise Exposure (dBA CNEL)				
			<60	60-65	65-70	70-75	75+
Commercial Services							
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support					50	50	
Visitor Accommodations				45	45	45	
Offices							
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters					50	50	
Vehicle and Vehicular Equipment Sales and Services Use							
Vehicle Repair & Maintenance; Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking							
Wholesale, Distribution, Storage Use Category							
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution							
Industrial							
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries							
Research & Development						50	
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.				
		Outdoor Uses	Activities associated with the land use may be carried out.				
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas.				
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.				
	Incompatible	Indoor Uses	New construction should not be undertaken.				
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.				

Source: City 2008a (as amended in 2015)

¹ Compatible noise levels and land use definitions reflect amendments to the City's General Plan Noise Element approved in 2015.

City of San Diego Municipal Code

The Municipal Code Chapter 5 Article 9.5, Noise Abatement and Control, declares that the making, creation, or continuance of excessive noises are detrimental to the public health, comfort, convenience, safety, welfare, and prosperity of the residents of the City. Section 59.5.0401 establishes sound level limits. The exterior noise limits for each land use classification are summarized in Table 5.10-3, *City of San Diego Table of Applicable Noise Limits*. One-hour average sound levels are not to exceed the applicable limit. The noise subject to these limits is defined as that part of the total noise at the specified location that is due solely to the action of said person.

Table 5.10-3
CITY OF SAN DIEGO TABLE OF APPLICABLE NOISE LIMITS

Land Use Zone	Time of Day	One-hour Average Sound Level (dBA)
Single Family Residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multi-Family Residential (up to a maximum density of 1/2000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other Residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City Municipal Code, Chapter 5, Article 9.5, Division 4, §59.5.0401, Sound Level Limits

Per the Municipal Code Section 59.5.0404, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dBA during the 12-hour period from 7:00 a.m. to 7:00 p.m. Further, construction activity is prohibited between the hours of 7:00 p.m. of any day to 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the Municipal Code. Exceptions are allowed and subject to a permit granted by the Noise Abatement and Control Administrator.

5.10.3 Significance Determination Thresholds

The following thresholds are based on the City's CEQA Significance Determination Thresholds (City 2016a) and the City's adopted Noise Ordinance, as applicable to the proposed BASASP. Based on the City's CEQA Significance Determination Thresholds, as modified to guide a programmatic analysis of the proposed BASASP, a significant noise impact would occur if implementation of the proposed BASASP would:

1. Expose new development to noise levels in excess of levels identified in the City's CEQA Significance Determination Thresholds (City 2016a). These noise levels are identified below in Table 5.10-4, *City of San Diego Traffic Noise Significance Thresholds*;
2. Result in or create a significant permanent increase in the existing noise levels. For the purposes of this analysis, a significant increase would be greater than a perceptible change (3 CNEL) over existing conditions or the generation of noise levels at a common property line that exceed the limits shown in Table 5.10-3;
3. Locate vibration-sensitive land uses within screening distances from the railway corridor as specified by the Federal Transit Administration (FTA; 2006). Subject vibration-sensitive land uses to construction-related ground-borne vibration that exceeds the "strongly perceptible" vibration annoyance potential criteria for human receptors, as specified by Caltrans (2013),

of 0.1 inch per second peak particle velocity (PPV), and 0.5 inch per second PPV for damage to older residential structures from continuous/frequent intermittent construction sources (such as impact pile drivers, vibratory pile drivers, and vibratory compaction equipment);

4. Result in temporary construction noise that exceeds 75 dBA L_{EQ} (12-hour) at the property line of a residentially-zoned property from 7:00 a.m. to 7:00 p.m. (as identified in Section 59.5.0404 of the Municipal Code) or if non-emergency construction occurs during the 12-hour period from 7:00 p.m. to 7:00 a.m.; or
5. Expose people to noise levels which exceed standards established in an adopted Airport Land Use Compatibility Plan (ALUCP).

Table 5.10-4
CITY OF SAN DIEGO TRAFFIC NOISE SIGNIFICANCE THRESHOLDS

Structure or Proposed Use that would be Impacted by Traffic Noise	Noise Level Limit		General Indication of Potential Significance
	Interior Space (CNEL)	Exterior Useable Space (CNEL)	
Single-family detached	45 dBA	65 dBA	Structure or outdoor useable area is < 50 feet from the center of the closest (outside) lane on a street with existing or future average daily trips (ADTs) > 7,500
Multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes.	45 dBA	65 dBA	
Offices, Churches, Business, Professional Uses	n/a	70 dBA	Structure or outdoor usable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	n/a	75 dBA	Structure or outdoor usable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 40,000

Source: City 2016a

5.10.4 Issue 1: Compatibility of Proposed Land Uses with City Noise Guidelines

Would the proposed BASASP result in the exposure of people to noise levels which exceed the City's adopted Noise Ordinance, the City's CEQA Significance Determination Thresholds, and/or standards established in an adopted Airport Land Use Compatibility Plan?

5.10.4.1 Impacts

Traffic Noise

Noise levels in the BASASP area would generally increase or decrease in accordance with traffic levels. Following implementation of the proposed project, traffic levels on roadway segments would mostly increase throughout the BASASP area, although multiple segments would see a decrease in

traffic levels. Noise levels from the I-5 corridor would increase. Future transportation, including traffic noise, is shown on Figure 5.10-3, *Future Transportation Noise Contours (2035)*.

Community village land use designations, which allow residential development, are proposed throughout the BASASP area west of I-5. These areas would be subject to noise levels of up to 70 CNEL from traffic noise increases due to implementation of the proposed project. I-5 would continue to generate substantial amounts of traffic noise, with noise levels at nearby community village land use areas above 75 CNEL. The distance to the 70 CNEL noise contour along I-5 would extend between approximately 350 to 400 feet from the northbound and southbound freeway centerlines.

A variety of noise sensitive uses would be located along local roadways within the BASASP area where traffic noise levels would exceed 65 CNEL, including freeway noise. The 65 CNEL contour south of Garnet Avenue may encompass some residential structures, and the 60 CNEL contours of Garnet Avenue, Grand Avenue, and Mission Bay Drive may affect residential structures. Noise levels of 60 CNEL would extend into proposed residential and community village areas. Proposed community village areas are located north and south of Garnet Avenue, and east and west of Mission Bay Drive. These include areas within the larger freeway noise contours of I-5. Although noise levels throughout the BASASP area would generally increase, many segments, including Balboa Avenue, Grand Avenue, and Morena Boulevard, would see reduced traffic and therefore, lower noise levels upon implementation of the proposed project.

NSLUs are generally considered incompatible with outdoor noise levels of 65 to 70 CNEL. However, as indicated in Table 5.10-2, the General Plan conditionally allows multiple dwelling unit residential development to be exposed to exterior noise levels of up to 70 CNEL. Proposed NSLUs under the BASASP would be primarily multi-family or mixed-use in nature. Substantial numbers of new single-family residences are not anticipated. No institutional sites such as schools or hospitals are located or proposed within the BASASP area.

Railway Noise

The San Diego MTS Trolley Blue Line extension project aims to have trains operating through the BASASP area upon the line's full buildout by 2021 (SANDAG 2017b). Freight trains would likely operate on an as-needed basis and would not have a fixed schedule, with future service potentially increasing or decreasing depending on future demand. Amtrak and COASTER services are assumed to operate at conditions similar to existing conditions. Noise levels and frequency would therefore continue to vary.

As noted in Section 5.10.1.3, sound level distances for railway traffic were derived by combining future Trolley service from the Mid-Coast Corridor project (SANDAG 2014) and train assumptions provided by LOSSAN (2012). It is anticipated that rail traffic would generate noise levels of 60 CNEL approximately 270 feet from the railway centerline.

Light industrial and transportation-related land uses are proposed under the BASASP in the immediate vicinity of the tracks. Land uses allowing residential development are not proposed within the vicinity of the tracks. Furthermore, due to the location of I-5, exposure of potential future residences west of I-5 to rail noise would be overshadowed by freeway and vehicular traffic noise. As

a result, the proposed project would not increase the number of sensitive noise receptors exposed to railway noise. No significant impacts from railway noise would occur.

Stationary Noise

Similar to existing conditions, future development within the BASASP area would be subject to various stationary noise sources including noise from equipment and commercial activities. Enforcement of noise limits imposed by the City's Noise Ordinance would avoid significant impacts on future development from stationary sources.

Airport Noise

The closest airports to the BASASP area are Montgomery Field, located 3.8 miles to the east, and San Diego International Airport, located 4.3 miles to the south. No private airstrips are located in the vicinity of the planning area. The BASASP area is not located within the 60 CNEL noise contours of either airport. Therefore, no inconsistency with City noise standards or the standards within both ALUCPs are anticipated.

Interior Noise

Standard construction techniques generally provide a 15 dBA reduction of exterior noise within the interior space of buildings. Given this assumption, standard building construction could be assumed to maintain interior noise to levels less than 45 CNEL for residential uses when exterior noise sources are 60 CNEL or less. If exterior noise levels exceed 60 CNEL for new residences, interior noise levels could potentially exceed the General Plan's interior noise standard of 45 CNEL.

Traffic associated with the proposed project would increase noise levels along a number of roadway segments throughout the BASASP area. Furthermore, the proposed project would allow new residential development in areas where noise levels exceed 60 CNEL. As a result, additional noise attenuation would be required for new structures to achieve or maintain interior noise levels which would not exceed 45 CNEL for residences, and 50 CNEL for new commercial uses. Significant interior noise impacts could occur.

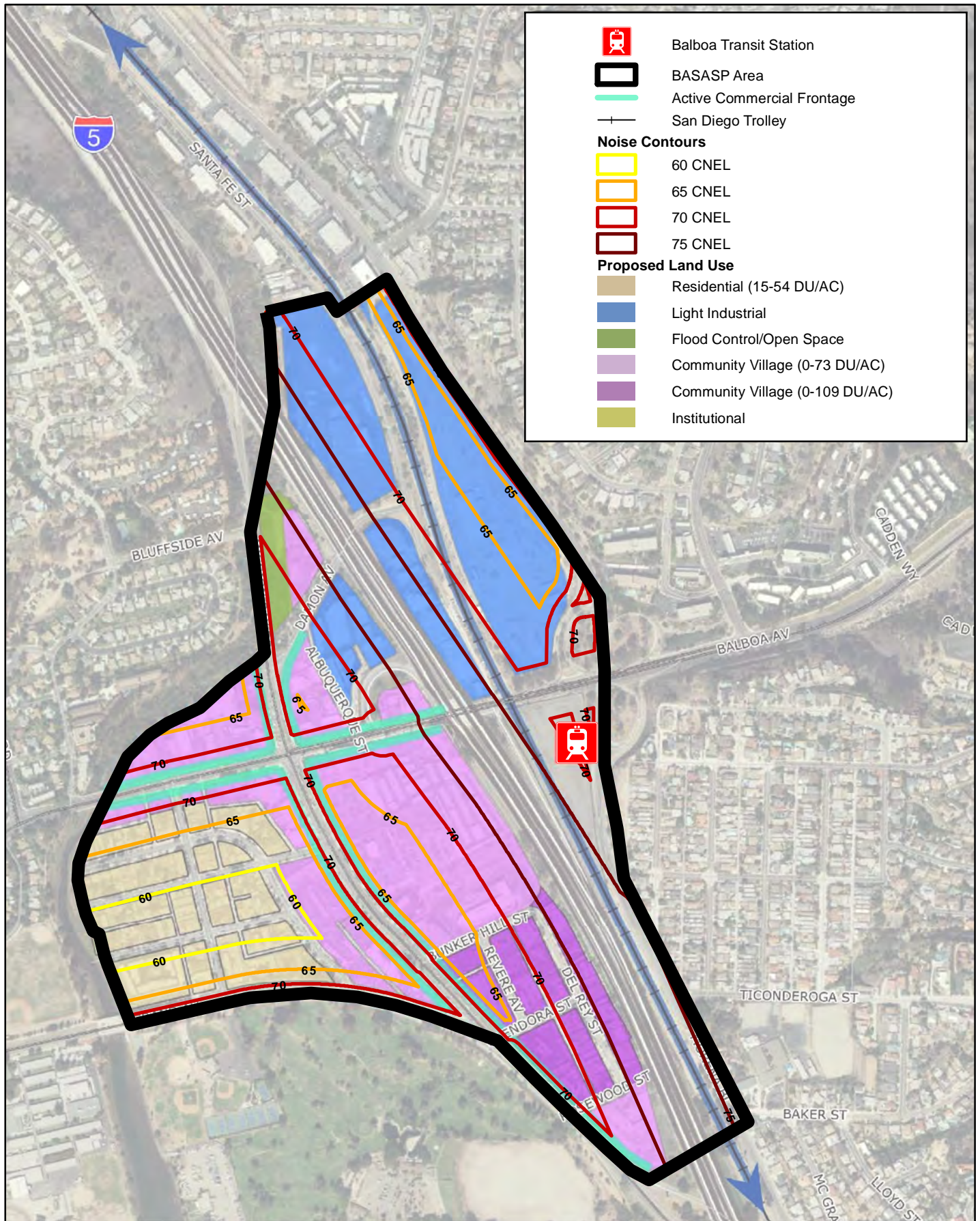
5.10.4.2 Significance of Impacts

Implementation of the proposed project could potentially expose new development to exterior or interior noise levels in excess of the Land Use – Noise Compatibility Guidelines established in the City's Noise Element, which would result in an inconsistency with City standards and a potentially significant noise impact.

5.10.4.3 Mitigation Framework

Per Section 1207.4 of Title 24, California Code of Regulations:

Allowable interior noise levels. Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric shall be either the day-night average sound level (L_{DN}) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan.



Balboa Avenue Station Area Specific Plan

Future Transportation Noise Contours (2035)

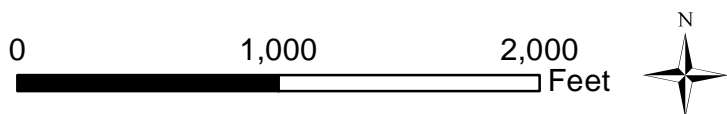


Figure 5.10-3

Consistent with General Plan Noise Element Policy NE-A.4, the following measures would be required to ensure that NSLUs are not exposed to noise levels in excess of City standards.

NOI-1 Where new development would expose people to noise exceeding normally acceptable levels, a site-specific acoustical analysis shall be performed prior to the approval of building permits for:

- Single-family homes, senior housing, and mobile homes where exterior noise levels range between 60 and 65 CNEL.
- Multi-family homes and mixed-use/commercial and residential, where exterior noise levels range between 65 and 70 CNEL.
- All land uses where noise levels exceed the conditionally compatible exterior noise exposure levels as defined in the City's Land Use – Noise Compatibility Guidelines.

The acoustical analysis shall be conducted to ensure that barriers, building design, and/or location are capable of reducing residential outdoor use area noise levels to their conditionally compatible limits as specified in the General Plan Noise Element Land Use – Noise Compatibility Guidelines. The analysis shall also ensure interior noise levels at 45 CNEL or less for residences and 50 CNEL or less for commercial uses. Barriers may include a combination of earthen berms, masonry block, and plexiglass. Building location may include the use of appropriate setbacks. Building design measures may include dual-pane windows, solid core exterior doors with perimeter weather stripping, and mechanical ventilation to allow windows and doors to remain closed.

5.10.4.4 Significance After Mitigation

Implementation of actions pursuant to Mitigation Measure NOI-1, along with implementation of state and local noise control laws, including Section 1207.4 of Title 24, would ~~reduce-ensure that~~ impacts related to noise levels ~~which exceed standards to would be~~ less than significant for future development.

5.10.5 Issue 2: Permanent Increase in Ambient Noise Levels

Would the proposed BASASP result in or create a significant permanent increase in existing ambient noise levels?

5.10.5.1 Impacts

Future traffic noise levels presented in this analysis are based on traffic volumes provided by the Traffic Impact Study (Kimley Horn 2017). TNM software was used to calculate the noise contour distances for Existing and Future conditions. The off-site roadway modeling represents a conservative analysis that does not consider topography or attenuation provided by existing structures. The results of this analysis for the CNEL at 100 feet from the roadway centerline are shown below in Table 5.10-5, *Off-site Traffic Noise Levels*.

A significant direct impact would occur if existing conditions approach or exceed City standards for nearby land uses and the proposed project more than doubles (increases by more than 3 CNEL) the existing noise level. Vehicular traffic in the BASASP area would generally increase with buildout under the proposed project. The future noise environment, however, would be dominated by highway traffic noise, which would overshadow any increased traffic noise on local streets in close proximity to the freeways. Roadway noise increases associated with future development pursuant to the proposed project are shown in Table 5.10-5.

**Table 5.10-5
OFF-SITE TRAFFIC NOISE LEVELS¹**

Roadway Segment	Existing Conditions	Future Conditions		
	CNEL at 100 feet	CNEL at 100 feet	Change in CNEL	Potentially Significant Increase
Balboa Avenue				
Garnet Avenue to Grand Avenue	62.3	62.0	-0.3	No
Garnet Avenue				
Bond Street to Mission Bay Drive	71.0	71.0	0.0	No
Mission Bay Drive to I-5 SB Onramp	69.5	70.1	0.6	No
I-5 SB Onramp to I-5 NB Offramp	70.7	71.6	0.9	No
I-5 NB Offramp to Morena Boulevard SB Ramps	70.9	72.3	1.4	No
Balboa Avenue (CA-274)				
Morena Boulevard SB Ramps to Morena Boulevard NB Ramps	70.5	70.4	-0.1	No
Morena Boulevard NB Ramps to Moraga Avenue	70.1	69.3	-0.8	No
Moraga Avenue to Clairemont Drive	69.2	68.9	-0.3	No
East of Clairemont Drive	69.5	70.1	0.6	No
Grand Avenue				
Kendall Street to Lamont Street	67.9	64.6	-3.3	No
Lee Street to Bond Street	66.6	66.5	-0.1	No
Figueroa Boulevard to Mission Bay Drive	66.6	66.6	0.0	No
Mission Bay Drive				
Bluffside Avenue to Damon Avenue	66.3	66.7	0.4	No
Damon Avenue to Garnet Avenue	66.9	67.0	0.1	No
Garnet Avenue to Magnolia Avenue	65.5	66.6	1.1	No
Magnolia Avenue to Bunker Hill Street	65.5	66.6	1.1	No
Bunker Hill Street to Grand Avenue	65.4	66.3	0.9	No
Grand Avenue to I-5 Ramps	68.2	68.3	0.1	No
Morena Boulevard				
Jutland Drive to Avati Drive	64.4	66.1	1.7	No
Avati Drive to Balboa Avenue Ramps	66.8	67.2	0.4	No
Balboa Avenue Ramps to Ticonderoga Street	65.8	65.2	-0.6	No
Gesner Street to Clairemont Drive	65.7	65.4	-0.3	No
Clairemont Drive				
Chippewa Court to Balboa Avenue	64.1	64.8	0.7	No
Balboa Avenue to Ute Drive	63.6	64.4	0.8	No
Denver Street to Morena Boulevard	65.7	66.9	1.2	No

**Table 5.10-5 (cont.)
OFF-SITE TRAFFIC NOISE LEVELS¹**

Roadway Segment	Existing Conditions	Future Conditions		
	CNEL at 100 feet	CNEL at 100 feet	Change in CNEL	Potentially Significant Increase
Damon Avenue				
Mission Bay Drive to Santa Fe Street	57.2	58.5	1.3	No
Santa Fe Street				
Damon Avenue to Balboa Avenue	51.2	54.9	3.7	No ²
Soledad Mountain Road				
Beryl Street to Garnet Avenue	66.7	66.8	0.1	No
North Mission Bay Drive				
De Anza Road to Mission Bay Drive	56.2	56.3	0.1	No

Source: HELIX 2018e

¹ Noise levels are for the individual streets only and exclude freeway noise.

² Although noise levels along this roadway would increase by more than 3 CNEL, exterior noise levels would remain below 65 CNEL.

SB = Southbound; NB = Northbound

5.10.5.2 Significance of Impacts

In comparison with existing conditions, ambient noise levels from future development pursuant to the proposed project would increase by more than 3 CNEL along one roadway segment of Santa Fe Street between Damon Avenue and Balboa Avenue. However, because exterior noise levels along this segment would remain below 65 CNEL, exclusive of freeway noise, implementation of the proposed project would not result in a significant increase in noise levels on this roadway or any other analyzed local roadway.

5.10.5.3 Mitigation Framework

Because there would be no significant impacts with respect to traffic noise on local streets, exclusive of freeway noise, within the BASASP area, no mitigation measures are required.

5.10.5.4 Significance After Mitigation

Impacts related to a permanent increase in ambient noise levels would be less than significant.

5.10.6 Issue 3: Excessive Ground-Borne Vibration

Would the proposed BASASP expose persons to or generate excessive ground-borne vibration?

5.10.6.1 Impacts

The main concerns related to ground-borne vibration are annoyance and damage. However, vibration-sensitive instruments and operations can be disrupted at much lower levels.

Vibration-sensitive land uses may include machinery in manufacturing and processing uses or medical laboratory equipment.

One potential source of ground-borne vibration is from trains on the rail line through the BASASP area. The FTA provides screening distances for land uses that may be subject to vibration impacts from commuter rail (FTA 2006). For Category 1 uses such as vibration-sensitive equipment and associated operations, the screening distance from the public right-of-way is 600 feet. For Category 2 land uses such as residences and buildings, where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses, such as institutional land uses, is 120 feet. The nearest proposed land uses containing residences within the BASASP area would not be within 200 feet of a rail line. Land use designations proposed by the BASASP would potentially accommodate land uses associated with Category 1. Future development pursuant to the proposed project therefore has the potential to locate new vibration-sensitive land uses within the screening distance of the railway tracks.

Construction activities are known to generate excessive ground-borne vibration. Construction activities related to implementation of the proposed project would not take place all at once; however, future development accommodated by the proposed project would have the potential to temporarily generate vibration resulting in short-term effects on nearby vibration-sensitive land uses. Sources of vibration during the construction of future projects within the BASASP area include the use of pile driving equipment and smaller equipment such as a vibratory roller. According to the Caltrans Transportation and Construction Vibration Guidance Manual, “strongly perceptible” ground-borne vibration is defined as equal to or in excess of 0.1 inch per second PPV. Construction activities within 200 feet and pile driving within 600 feet of a vibration-sensitive land use would be potentially disruptive to vibration-sensitive operations (Caltrans 2013).

5.10.6.2 Significance of Impacts

New development proposed within the screening distance of the tracks and development proposing vibratory construction equipment would require further analysis to determine impacts to vibration-sensitive land uses. Impacts due to ground-borne vibration could be potentially significant.

5.10.6.3 Mitigation Framework

Implementation of the following mitigation measures would reduce potential vibration-related impacts.

- NOI-2** A site-specific vibration study shall be prepared for proposed land uses development within FTA screening distances for potential vibration impacts related to train activity. For Category 1 uses such as vibration-sensitive equipment and associated operations, the screening distance from the public ROW is 600 feet. For Category 2 land uses such as residences and buildings, where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses, such as institutional land uses, is 120 feet. Proposed development shall implement recommended measures within the technical study to ensure that projects meet the FTA criteria for vibration impacts.
- NOI-3** A site-specific vibration study shall be prepared for proposed land uses development that have the potential for construction-related vibration impacts. Construction activities within

200 feet and pile-driving within 600 feet of a vibration-sensitive use would be potentially disruptive to vibration-sensitive operations. Proposed development shall implement recommended measures within the technical study to ensure that projects reduce construction-related vibration impacts to below 0.1 inch per second PPV at vibration-sensitive uses.

5.10.6.4 Significance After Mitigation

Because not all projects (ministerial) would necessarily be required to comply with site specific vibration study requirements, while implementation of Mitigation Measures NOI-2 and NOI-3 would reduce potential vibration-related impacts,; however, it cannot be known whether the vibration reduction measures would be adequate to minimize vibration levels to below a level of significance. Vibration impacts are considered to be would therefore be significant and unavoidable.

5.10.7 Issue 4: Construction Noise

Would the proposed BASASP result in temporary construction noise in excess of the City's Noise Ordinance?

5.10.7.1 Impacts

Although typically short-term, construction activities can be a substantial source of noise. The primary noise source is the operation of heavy construction equipment and impact noise associated with blasting and pile driving. As shown in Table 5.10-6, *Typical Construction Equipment Noise Levels*, operation of construction equipment would have the potential to generate high noise levels for construction activities, depending on the type, duration, and location of the activity.

**Table 5.10-6
TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS**

Equipment	Typical Noise Level (dBA at 50 feet from source)
Air Compressor	74
Backhoe	74
Ground Compactor	76
Concrete Mixer Truck	75
Crane	73
Dozer	78
Grader	81
Jack Hammer	82
Front End Loader	75
Paver	74
Impact Pile Driver	94
Pumps	78
Roller	73
Scraper	80
Dump Truck	73

Source: U.S. DOT Roadway Construction Noise Model 2008

Construction activities related to implementation of the proposed project would not take place all at once; however, future development accommodated by the proposed project would have the potential to temporarily generate construction noise resulting in a short-term elevated noise levels at nearby NSLUs.

The City regulates noise associated with construction equipment and activities through enforcement of Municipal Code Section 59.5.0404 standards related to hours and days of operation. The ordinance prohibits noise levels greater than 75 dBA L_{EQ} (12-hour) at any residential property line during the 12-hour period from 7:00 a.m. to 7:00 p.m. Furthermore, the City imposes conditions for the approval of building or grading permits.

5.10.7.2 Significance Before Mitigation

Because construction noise attributed to future projects in the BASASP area would be regulated by the Municipal Code, construction noise impacts due to the implementation of the proposed project would be determined by those projects' conformance to the Noise Ordinance. Future infill projects, such as those allowed under the BASASP, may be located in close proximity to existing and future noise-sensitive land uses. Construction activities related to implementation of the BASASP would potentially generate short-term noise levels in excess of 75 dBA L_{EQ} (12 hour) at adjacent properties. The ability for future projects to conform to the Noise Ordinance cannot be determined at the programmatic level. Noise impacts from construction activity are therefore considered potentially significant.

5.10.7.3 Mitigation Measures

Implementation of the following mitigation measure would reduce potential construction-related noise impacts.

NOI-4 ~~Construction contractors for~~ Future development projects within the BASASP shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in contractor specifications and shall include, but not be limited to, the following:

- ~~• Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. Construction is not allowed on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays (consistent with Section 59.5.0404 of the Municipal Code).~~
- Properly outfit and maintain construction equipment with manufacturer-recommended noise reduction devices to minimize construction-generated noise.
- Operate all diesel equipment with closed engine doors and equip with factory recommended mufflers.
- Use electrical power to operate air compressors and similar power tools.
- Employ additional noise attenuation techniques as needed to reduce excessive noise levels so that construction noise would be in compliance with Municipal Code Section

59.5.0404. Such techniques shall include, but not be limited to, the construction of temporary sound barriers or sound blankets between construction sites and nearby noise-sensitive receptors.

- Notify adjacent noise-sensitive receptors in writing within two weeks of any construction activity such as jackhammering, concrete sawing, asphalt removal, pile driving, and largescale grading operations that would occur within 100 feet of the property line of the nearest noise-sensitive receptor. The extent and duration of the construction activity will be included in the notification.
- Designate a "disturbance coordinator" who would be responsible for receiving and responding to any complaints about construction noise or vibration. The disturbance coordinator will determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, will require that reasonable measures be implemented to correct the problem.

5.10.7.4 Significance After Mitigation

Because not all projects (ministerial) would necessarily be required to comply with all of the measures identified in Mitigation Measure NOI-4, while implementation of Mitigation Measure NOI-4 would reduce construction-related noise impacts, however, it cannot be known whether the noise reduction measures would be adequate to reduce noise levels to below a level of significance.
Construction-related noise impacts are considered to be would therefore be significant and unavoidable.

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5.11 Paleontological Resources

This section describes the existing paleontological resource conditions and associated potential occurrences within the BASASP area, identifies regulatory requirements related to paleontological issues, and evaluates potential impacts and mitigation measures related to implementation of the proposed project.

The following analysis is based on review of available literature, including a geotechnical study conducted for the proposed project (AGE 2018), the City's CEQA Significance Determination Thresholds (City 2016a), and other applicable published and unpublished reports.

Paleontology is the science dealing with prehistoric plant and non-human animal life. Paleontological resources (or fossils) typically encompass the remains or traces of hard and resistant materials such as bones, teeth, or shells, although plant materials and occasionally less resistant remains (e.g., tissue or feathers) can also be preserved. The formation of fossils typically involves the rapid burial of plant or animal remains and the formation of casts, molds, or impressions in the associated sediment (which subsequently becomes sedimentary bedrock). The potential for fossil remains in a given geologic formation can be predicted based on known fossil occurrences from similar (or correlated) geologic formations in other locations. The assessment of paleontological resource sensitivity for surficial and geologic units is based on the following designations derived from Deméré and Walsh (1993):

- High Sensitivity – These formations are known to contain paleontological localities with rare, well-preserved, critical fossil materials. Generally, high-sensitivity formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- Moderate Sensitivity – Moderate sensitivity is assigned to formations known to contain paleontological localities and that are judged to have a strong, but often unproven, potential for producing unique fossil remains.
- Low Sensitivity – Low sensitivity is assigned to geologic or surficial formations/materials that, based on their relatively young age and/or high-energy depositional history, are judged unlikely to produce unique fossil remains.
- Zero Sensitivity – These formations consist of volcanic or plutonic igneous rocks with a molten origin (such as basalt or granite), or artificially and/or mechanically-generated materials (such as fill and topsoil), and do not exhibit any potential for producing fossil remains.

5.11.1 Existing Conditions

Based on the referenced geotechnical study, the surficial and geologic units present within the BASASP area are identified below, along with associated paleontological resource sensitivity ratings (refer to Figure 5.5-1).

5.11.1.1 Fill Materials

Fill materials are present in much of the BASASP area in association with Mission Bay, and exhibit no potential for the occurrence of sensitive paleontological resources.

5.11.1.2 Young Alluvial Deposits

Young alluvial deposits of Holocene age are mapped along the valley floor in Rose Canyon, and exhibit no potential for the occurrence of sensitive paleontological resources.

5.11.1.3 Young Colluvial Deposits

Although not shown on published maps, Holocene and late Pleistocene age young colluvial deposits were encountered in soil borings above the east bank of Rose Creek. This formation exhibits no potential for the occurrence of sensitive paleontological resources.

5.11.1.4 Old Alluvial Deposits

Old alluvial deposits of late to middle Pleistocene age are mapped above the east bank of Rose Creek in the northern portion of the BASASP area. Old alluvial deposits exhibit no potential for the occurrence of sensitive paleontological resources.

5.11.1.5 Old Paralic Deposits

Old paralic deposits of the late to middle Pleistocene age are found within and around the BASASP area. These deposits are also referred to as the Bay Point Formation of late Pleistocene age and exhibit a high potential for the occurrence of sensitive paleontological resources.

5.11.1.6 San Diego Formation

The mid to late Pliocene age San Diego Formation is found in two separate small areas in the southeast and northwest portions of the BASASP area. This formation exhibits a high potential for the occurrence of sensitive paleontological resources.

5.11.1.7 Scripps Formation

The Scripps Formation of middle Eocene age is found along the mid to upper hillside area on the east side of Rose Canyon, south of Balboa Avenue. This formation exhibits a high potential for the occurrence of sensitive paleontological resources.

5.11.1.8 Ardath Shale

Ardath Shale is lower to middle Eocene in age and is found along the eastern edge of the BASASP area. This formation exhibits a high potential for the occurrence of sensitive paleontological resources.

5.11.1.9 Mount Soledad Formation

The Eocene age Mount Soledad Formation is found along the northern edge of the BASASP area, on the lower east and west walls of Rose Canyon, and exhibits a high potential for the occurrence of sensitive paleontological resources.

5.11.2 Regulatory Framework

5.11.2.1 CEQA Guidelines

Pursuant to Section 15065 of the State CEQA Guidelines (CCR Sections 15000–15387), a lead agency must find that “a project may have a significant effect on the environment and therefore require an EIR to be prepared for the project where the project has the potential to eliminate important examples of the major periods of California history or prehistory, which includes the destruction of significant paleontological resources.”

5.11.3 Significance Determination Thresholds

Based on the City’s CEQA Significance Determination Thresholds (City 2016a), as modified to guide a programmatic analysis of the proposed BASASP, impacts related to paleontological resources would be significant if the proposed BASASP would:

1. Require over 1,000 cubic yards of excavation and more than 10 feet deep in a high resource potential geologic deposit/formation/rock unit.
2. Require over 2,000 cubic yards of excavation and more than 10 feet deep in a moderate resource potential geologic deposit/formation/rock unit.

5.11.4 Issue 1: Paleontological Resources

Would the proposed BASASP require over 1,000 cubic yards of excavation and more than 10 feet deep in a high resource potential geologic deposit/formation/rock unit, or over 2,000 cubic yards of excavation and more than 10 feet deep in a moderate resource potential geologic deposit/formation/rock unit?

5.11.4.1 Impacts

The BASASP area includes a number of formations (old paralic deposits, San Diego, Scripps, Mount Soledad, Ardath Shale) characterized with a high paleontological resources sensitivity rating. While portions of the BASASP area have been previously disturbed and developed with existing urban uses, grading associated with future development activities implemented in accordance with the proposed project involving excavation which exceeds the criteria noted above in Section 5.11.3 (i.e., grading in excess of 1,000 cubic yards, extending to a depth of 10 feet or greater into high sensitivity formations, or that require grading in excess of 2,000 cubic yards, extending to a depth of 10 feet or greater into moderate sensitivity formations), could potentially expose undisturbed formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects

proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a significant impact

Build-out of future ministerial projects implemented in accordance with the proposed project would likely result in a certain amount of disturbance to the native bedrock within the BASASP area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and to apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with the proposed project would be potentially significant

5.11.4.2 Significance of Impacts

Based on the presence of formational units exhibiting high potential for the occurrence of sensitive paleontological resources in the BASASP area, potential impacts from future discretionary and ministerial projects within the BASASP area would be potentially significant.

5.11.4.3 Mitigation Framework

To reduce the potential adverse impact to paleontological resources associated with discretionary projects, future discretionary project would incorporate the mitigation measure identified in the General Plan PEIR addressing paleontological resource impacts.

The following measure would apply to any discretionary project that proposes subsurface disturbance within a high or moderate sensitivity formation. If no subsurface disturbance is planned, then paleontological resources would not be impacted and development of a project-specific paleontological monitoring and discovery treatment plan would not be necessary. The following mitigation measure would reduce paleontological resource impacts resulting from implementation of future discretionary projects to below a level of significance:

PALEO-1: Paleontological Review and Monitoring

Prior to the approval of ~~subsequent~~ future discretionary development projects implemented in accordance with the proposed project, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Determination Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future development projects that are subject to environmental review.

I. Prior to Project Approval:

- A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.
- Require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.
- Require construction within a known fossil location or fossil recovery site.

Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.

- B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.
- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
 - Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
 - Monitoring may be required for shallow grading (less than 10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.
 - Monitoring is not required when grading documented artificial fill.
 - When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological MMRP shall be implemented during construction grading activities.

5.11.4.4 Significance After Mitigation

All future discretionary projects that would occur as a result of the project would be required to comply with Mitigation Measure PALEO-1. Implementation of Mitigation Measure PALEO-1 would reduce paleontological impacts associated with future discretionary development to below a level of significance.

Future ministerial projects proposed in conformance with the proposed project would also likely result in a certain amount of disturbance to the native bedrock within the BASASP area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with development of the proposed project would remain significant and unavoidable.

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5.12 Population and Housing

5.12.1 Existing Conditions

5.12.1.1 City-wide Existing Conditions

SANDAG produces growth forecasts for population, housing, and employment for the San Diego region. The SANDAG Series 13 Forecast shows that in 2012 the City of San Diego had a household population of 1,270,659 people, as shown in Table 5.12-1, *SANDAG Series 13 Forecast – Housing Units and Household Population City of San Diego*. The population forecasted by SANDAG indicates that the City will increase by approximately 27 percent to more than 1.6 million people by 2035; and by approximately 36 percent to more than 1.7 million people by 2050 (SANDAG 2013).

The SANDAG Forecast shows that in 2012, there were 518,137 dwelling units in the City. This is expected to increase to over 640,000 units by 2035 and to over 695,000 units by 2050 (SANDAG 2013). Single-family units made up approximately 54 percent of the total housing stock in 2012. This percentage is forecasted to decrease to approximately 45 percent by 2035 as shown in the SANDAG Series 13 Forecast (SANDAG 2013).

**Table 5.12-1
SANDAG SERIES 13 FORECAST – HOUSING UNITS AND HOUSEHOLD POPULATION
CITY OF SAN DIEGO**

	Year			2012 to 2050 Change	
	2012	2035	2050	Numeric	Percent
Housing Units	518,137	640,668	695,703	177,566	34%
Household Population	1,270,659	1,611,904	1,722,569	451,910	36%

Source: SANDAG 2013

5.12.1.2 BASASP Existing Conditions

As described in Section 5.1, *Land Use*, the proposed project only changes the planned land use for the Pacific Beach portion of the BASASP area. There are no residential land uses within the Clairemont Mesa portion of the BASASP area. As a result, changes to population and housing associated with the proposed project would only occur within the Pacific Beach Community Plan area. This discussion therefore addresses the BASASP-associated effects on population and housing, as they would be reflected in the Pacific Beach Community Plan area. The SANDAG Series 13 Forecast shows that in 2012, the Pacific Beach Community Plan area had a household population of 40,115 people and had 22,052 dwelling units, as shown in Table 5.12-2, *SANDAG Series 13 Forecast – Housing Units and Household Population Pacific Beach Community Plan Area*. These are forecasted to increase to a household population of 48,505 people and a total of 25,605 housing units by 2035, and 52,565 people and a total of 28,063 dwelling units by 2050.

Table 5.12-2
SANDAG SERIES 13 FORECAST – HOUSING UNITS AND HOUSEHOLD POPULATION
PACIFIC BEACH COMMUNITY PLAN AREA

	Year			2012 to 2050 Change	
	2012	2035	2050	Numeric	Percent
Housing Units	22,052	25,605	28,063	6,011	27%
Household Population	40,155	48,505	52,565	12,410	31%

Source: SANDAG 2013

Table 5.12-3, *Pacific Beach Future Population and Housing Comparison*, shows that the Pacific Beach Community Plan area with the proposed project is calculated to have a total build out of 31,570 housing units, which is a potential increase of 3,507 total housing units above the SANDAG 2050 forecasted amount. The community plan buildout is a theoretical calculation of the build out that could occur after 2050 rather than a forecasted amount. The community plan estimated build out assumes 83 fewer single-family homes and 3,590 additional multi-family units from the Forecast at the year 2050. The community plan build out with the proposed project assumes that the 83 units would be developed as multi-family units rather than single-family units.

The BASASP proposes to have 4,729 units at build out beyond 2050, which is an increase of 3,507 units within the BASASP area compared to the projected build out of the adopted Pacific Beach Community Plan at 2050. The proposed project, therefore, would provide for increased housing opportunities within the Pacific Beach community. It is estimated that the Pacific Beach Community Plan area with the proposed project will have 59,740 people living in an occupied housing unit at build out, which is 6,565 people more than the SANDAG Series 13 Forecast for the year 2050. To calculate household population, the proposed BASASP used an assumption of a vacancy rate of 5.9 percent and a 1.99 persons per household for all structure types which is consistent with the SANDAG Series 13 Forecast for 2050.

The SANDAG Series 13 Forecast shows that Pacific Beach community plan area could have 14,689 total employees by 2050. Implementation of the proposed project could result in 14,145 employees which, is 544 less employees than the SANDAG Series 13 Forecast by the year 2050.

Table 5.12-3
PACIFIC BEACH FUTURE POPULATION AND HOUSING COMPARISON

	Year			Pacific Beach Community Plan Area with Proposed Project
	2012	2035	2050	Build out
Multifamily	13,623	19,463	22,420	26,010
Single Family	8,429	6,142	5,643	5,560
Mobile Homes	0	0	0	0
Total Housing Units	22,052	25,605	28,063	31,570
Household Population	40,670	48,505	53,175	59,740
Employees	12,210	13,880	14,689	14,145

Table 5.12-4, *Existing Population and Housing Comparison*, provides a comparison of the existing (January 1, 2016) population and housing estimates for the Pacific Beach Community Plan area, the BASASP area, and the City as a whole as prepared by SANDAG. The Pacific Beach Community Plan area supported approximately three percent of the City's population in 2016. Approximately 80 percent of the total existing housing stock in the Pacific Beach Community Plan area is multi-family, while citywide the total existing housing stock for multi-family is 61 percent. Approximately 88 percent of the total existing housing stock in the BASASP area is multi-family.

**Table 5.12-4
EXISTING POPULATION AND HOUSING COMPARISON**

Area and Population	Housing Stock					Household Population
	Single-Family ¹		Multi-Family ²		Total	
	Units	%	Units	%	Units	
City of San Diego	207,089	39%	321,025	61%	528,114	1,338,020
Pacific Beach Community Plan Area	4,372	20%	17,748	80%	22,120	45,485
BASASP	91	12%	672	88%	763	1,563

Source: SANDAG 2016 Demographic Estimate and City of San Diego Planning Department

¹ Includes single multiple unit single family

² Citywide multifamily number includes Mobile Home and other types of housing units

5.12.2 Regulatory Framework

5.12.2.1 San Diego Forward: The Regional Plan

SANDAG's Regional Plan provides a growth management strategy designed to limit urban sprawl and preserve natural resources. The overall goal of the Regional Plan is to strengthen the integration of local and regional land use, transportation, and natural resource planning. Strategies to locate new housing within existing urbanized communities close to transit and jobs is intended to help conserve open space and rural areas, rejuvenate existing neighborhoods, and shorten long commutes (SANDAG 2015).

The Regional Plan is the principal planning tool for regional growth, planning, and infrastructure investment. The Plan considers housing needs for the region, including housing choice availability in all price ranges, in addition to addressing the need for the application of smart growth strategies in the siting and development of new housing.

The role of SANDAG in the local general plan housing element process is the preparation of the Regional Housing Needs Assessment. SANDAG and the California Department of Housing and Community Development determine each region's share of the State's housing need for the five-year housing element cycle based on growth projections. This number represents the amount of new housing units the region will need to plan for during the next housing element cycle. Then SANDAG works with the local jurisdictions to allocate overall regional housing needs to each jurisdiction in four required income categories (very low, low, moderate, and above moderate).

5.12.2.2 General Plan Housing Element

Consistent with regional plans and policies provided in SANDAG's Regional Plan, the City's General Plan promotes the City of Villages strategy to address forecasted population growth and development needs through effective and innovative development. This strategy focuses growth into villages or mixed-use activity centers that are pedestrian friendly, offer a variety of housing types and range of densities, and are linked to a transit system. The City's 2013-2020 Housing Element, adopted in March 2013, analyzes the City's housing needs, and identifies potential sites for the provision of additional housing in the City.

The Housing Element includes objectives, policies, and programs for five major goals, including the provision of sufficient housing of all income groups, maintaining the safety and livability of the housing stock, streamlining processes for the creation of new housing development, promoting affordable housing, and cultivating the City as a sustainable model for development (City 2013b).

5.12.3 Significance Determination Thresholds

As the City's CEQA Significance Determination Thresholds (City 2016a) do not establish specific significance thresholds for population and housing, the following analysis relies on Appendix G of the CEQA Guidelines. Impacts related to population and housing would be significant if the proposed BASASP would:

1. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere; or
2. Induce substantial population growth in an area, either directly or indirectly.

5.12.4 Issue 1: Population Displacement

Would the proposed BASASP displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

5.12.4.1 Impacts

The proposed project would re-designate some existing commercial areas to permit mixed-use residential uses and to increase the density of certain residential areas in accordance with City policies, goals, and regulations, as well as projected regional population growth.

In the western-most portion of the BASASP area, temporary displacement of population or housing stock would occur if existing housing is demolished for future development. If displacement occurs, however, it would be temporary in nature. The BASASP area's total housing stock ultimately would increase compared to existing levels and those allowed under the adopted Pacific Beach Community Plan/LCP. With the implementation of the proposed project, the availability of multi-family housing would be substantially increased and, with the development of multi-family housing in locations with existing single-family housings, the potential for existing single-family housing would decrease, consistent with overall planning trends. No currently designated residential areas would be redesignated or rezoned to solely non-residential uses. While existing single-family housing would

decrease under the proposed project, the number of existing single-family and multi-family dwelling units would be replaced and supplemented by the addition of multi-family housing units. Under the proposed project, a total of 4,729 dwelling units could be developed, representing an increase of 3,966 units over the number of existing dwelling units in the BASASP area, and 3,507 units over 2050 SANDAG Forecast for the adopted Pacific Beach Community Plan.

Substantial numbers of existing housing or people would not be displaced, therefore necessitating the construction of replacement housing elsewhere. Rather, housing numbers in the area would rise and would be able to accommodate increased residential population near to regional transit service and other amenities.

5.12.4.2 Significance of Impacts

Displacement of residents related to future development under the proposed project (if any) would be temporary in nature, as the number of dwelling units in the BASASP area would increase and no existing residential areas would be re-designated to non-residential uses. Therefore, impacts related to the displacement of residents would be less than significant.

5.12.4.3 Mitigation Framework

Impacts would be less than significant; thus, no mitigation is required.

5.12.4.4 Significance After Mitigation

Impacts related to population displacement would be less than significant.

5.12.5 Issue 2: Growth Inducement

Would implementation of the proposed BASASP induce substantial population growth in the area, either directly or indirectly?

5.12.5.1 Impacts

SANDAG population forecast for the BASASP area and the Pacific Beach Community Plan area indicate that population will increase over time, regardless of whether or not the proposed project is implemented. The projected growth is not the same as under the proposed BASASP, however.

To accommodate expected population growth, the proposed project would re-designate some existing industrial and commercial areas to permit residential uses and would increase the density of residential areas in accordance with City's General Plan City of Villages strategy. Total housing stock would also be increased compared to both existing levels and the number of units allowed under the adopted Pacific Beach Community Plan. Specifically, a total of capacity of 4,729 dwelling units would be available under the proposed project, an increase of 3,966 units over the number of existing dwelling units in the BASASP area, and 3,507 units over 2050 SANDAG Forecast for the adopted Pacific Beach Community Plan area.

As an established urban community, the existing infrastructure within this eastern portion of the Pacific Beach Community Plan area would be able to support the anticipated population growth without major additions or expansions which could induce additional growth. No new roads or roadway extensions would be required and, because the area is developed, there are no substantial areas of undeveloped land within the BASASP area that could induce population growth.

As discussed in Section 5.13, *Public Services*, the public facilities (e.g., libraries, schools, and fire/police protection) needed to support development already exist in the area. With the exception of the libraries and parks, the existing public facilities are expected to be able to meet the needs of the community under the proposed project. While there are three libraries near (within two miles) the BASASP area, they do not meet the General Plan standards with regards to square footage of the library facilities. Regardless, these libraries would adequately serve the BASASP area. As discussed in Section 5.13, the Pacific Beach and Clairemont Mesa communities currently have a deficit of parkland, and the proposed project does not include additional parkland. Therefore, an overall park deficit would occur at buildout of the proposed project. Where existing and proposed park space is not sufficient for the projected population growth, the General Plan allows for the use of park equivalencies, as determined by the community and City staff, through a set of guidelines. The BASASP area is a heavily urbanized community where park equivalencies would be appropriate for satisfying some population-based park needs. Thus, the population growth associated with the proposed project would not exceed the ability of the public facilities to meet the projected demand. Similarly, as discussed in Section 5.14, *Public Utilities*, existing public utilities (energy; water; sewer; and solid waste collection, processing, and disposal) are currently available in the area and are expected to be able to serve additional development without major expansions which might induce growth.

Furthermore, pursuant to the General Plan discussion outlined above, population and housing growth will occur in the City with or without implementation of regional or local planning efforts. The proposed BASASP includes a number of goals and policies to manage and accommodate this growth along with efforts to provide sustainable development as described in BASASP Chapter 7. Overall, however, although the proposed project would increase density, housing options, and population within BASASP area, these changes would occur in conjunction with the overall planning goals and policies of the City. BASASP-related changes would bring population directly into an area adjacent to primary transportation and recreational infrastructure in the City and would be expected to relieve pressure on some City areas without these amenities.

~~In the immediate area surrounding the BASASP area in Pacific Beach, and within adjacent portions of Clairemont Mesa, no changes to land use designations or zoning are proposed, and the areas are already largely built out. No project-related growth is expected in these areas, therefore, although it is anticipated that growth will occur, as projected in the City's and SANDAG's regional plans.~~

5.12.5.2 Significance of Impacts

No new or major expansion of infrastructure serving the area is anticipated to occur as a result of implementation of the proposed project. Furthermore, the proposed BASASP includes planning, design, and implementation strategies intended to accommodate project effects, such as housing provision and non-vehicular transportation options. Outside the BASASP area, project-related

growth is not expected due to the areas being largely built out as an existing condition. As a result, impacts related to growth inducement would be less than significant.

5.12.5.3 Mitigation Framework

Impacts would be less than significant; thus, no mitigation is required.

5.12.5.4 Significance After Mitigation

Impacts related to growth inducement would be less than significant.

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5.13 Public Services

Public services are those functions that serve residents on a community-wide basis. These functions include parks and recreation centers, libraries, schools, and fire and police protection. The following provides a discussion of these services and facilities as they relate to the proposed project.

5.13.1 Existing Conditions

5.13.1.1 Fire Protection

Fire protection services to the BASASP area are provided by the San Diego Fire-Rescue Department (SDFD). The SDFD serves a total area of approximately 331 square miles, including 17 miles of coastline extending three miles offshore, and a population of approximately 1,337,000 people. The SDFD has a current total of 47 fire stations and nine permanent lifeguard stations, and employs 801 uniformed personnel, 338 lifeguards, and 161 civilian personnel for a total of 1,300 personnel. In addition to fire protection services, the SDFD also provides emergency medical services (EMS).

Ambulances are staffed with one emergency medical technician (EMT) and one paramedic, and first responders have a minimum of one firefighter/paramedic on board (City 2017d). A future fire station is identified in the Pacific Beach Community Plan in the vicinity of Garnet Avenue and Mission Bay Drive within the BASASP area.

San Diego Fire Station 25 provides primary fire protection and advanced life support services to the BASASP area and is located at 1972 Chicago Street, about 1.5 miles southeast of BASASP area. Fire Station 25 was originally built in 1946 and was moved to its current location in 1953 to serve Bay Park and its surrounding areas, totaling 5.4 square miles. This station includes a fire engine and battalion (City 2017d). Table 5.13-1, *Fire Station 25 Incident Runs for Fiscal Year 2016*, shows the number of incident runs for Engine 25 and Battalion 3 for Fiscal Year (FY) 2016.

**Table 5.13-1
FIRE STATION 25 INCIDENT RUNS FOR FISCAL YEAR 2016**

	Engine 25	Battalion 3
Total Incident Runs	2,688	415
Fire	240	264
Medical/Rescue	22	81
Other	2,426	70

Source: City 2017a

In 2017, the City retained Citygate Associates, LLC to perform a Standards of Response Cover Review (Citygate 2017) to review the adequacy of the current fire station resource deployment system, the risks to be protected, and the emergency incident outcomes desired by the community. This study concluded that additional fire-rescue resources are needed to meet best practice outcome response times for all neighborhoods. For effective outcomes on serious medical emergencies and to keep serious, but still emerging, fires small, the City's adopted Fire-Rescue response time policy is that the first-due fire unit should arrive within 7 minutes and 30 seconds of fire dispatch, 90 percent of the time. Fire-Rescue's actual performance from fire dispatch call receipt to first crew on scene is

8 minutes and 10 seconds to 90 percent of fire and emergency medical services incidents. Only seven fire stations meet the 90 percent best practice goal of 7 minutes and 30 seconds from fire dispatch to first unit on scene. The average response time for Station 25 is 8 minutes and 53 seconds (Citygate 2017).

Fire-Rescue does not meet the City's goals for dispatch and crew turnout time. The issue with response times is the travel time from too few fire stations across an increasingly traffic-congested road network. Fire-Rescue is not meeting the City's adopted goal of five minutes travel time for the first arriving unit. The Citywide actual performance is 6 minutes and 9 seconds from crew notification. Only four fire stations meet the five-minute travel time goal. The average travel time for Station 25 is 6 minutes and 59 seconds (Citygate 2017).

These results are reflective of the large size of some station areas, simultaneous calls for service, road network design, and traffic congestion issues. Fire-Rescue is staffed for several serious buildings fires at a time and multiple medical calls for service at a time. The regional automatic and mutual aid response system delivers greater alarm and multiple incident support.

The Citygate analysis identified a gap for the Pacific Beach Community Planning area. While six additional fire stations are programmed in the City's current Capital Improvement Program, no new fire stations are planned or programmed within the Pacific Beach Community Planning area or the Clairemont Mesa Community Planning area.

Adopted Fire Station Location Measures

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones are listed in Table 5.13-2, *Deployment Measures for San Diego City Growth by Population Density per Square Mile*.

Aggregate Population Definitions

Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregate into a population "cluster," the standards as shown in Table 5.13-3, *Aggregate Population Standards*, guide the determination of response time measures and the need for fire stations.

**Table 5.13-2
DEPLOYMENT MEASURES FOR SAN DIEGO CITY GROWTH
BY POPULATION DENSITY PER SQUARE MILE**

	Structure Fire Urban Area >1,000 people/ sq. mi.	Structure Fire Rural Area 1,000 to 500 people/sq. mi.	Structure Fire Remote Area 500 to 50 people/sq. mi.	Wildfires Populated Area Permanent Open Space Areas
1 st Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
1 st Alarm Travel Time	8	16	24	15
1 st Alarm Total Reflex	10.5	18.5	26.5	17.5

Source: City 2008a

**Table 5.13-3
AGGREGATE POPULATION STANDARDS**

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	>200,000 people	4 minutes
Urban-Suburban	<200,000 people	5 minutes
Rural	500-1,000 people	12 minutes
Remote	< 500 people	>15 minutes

Source: City 2008a

The City's EMS also has ambulances, paramedics, and EMTs who respond to emergency calls. There are four levels of calls. Level 1 is the most serious (e.g., heart attack, shortness of breath), and the closest fire engine and an advance life support ambulance respond to this type of call. The fire crew has to respond within eight minutes of being dispatched pursuant to City requirements, and the ambulance has to respond within 12 minutes for Level 1 (the most serious) calls. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advance life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call (e.g., someone having extended flu-like symptoms), either a basic or advance life support ambulance would respond. A basic ambulance is staffed with two EMTs, whereas an advance life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (e.g., the patient could have driven themselves to a hospital), a basic ambulance would respond within 18 minutes of being dispatched.

5.13.1.2 Police Protection

The San Diego Police Department (SDPD) provides police services including patrol, traffic, investigative, records, laboratory, and support services to the City (City 2008a). The BASASP area is currently patrolled by Beats 113, 116, and 122 in the Northern Division of the SDPD. Beat 122 covers the majority of the BASASP area, and Beats 113 and 116 cover the areas east of I-5, north and south of Balboa Avenue, respectively. The Northern Division currently serves a population of 225,234 people, and encompasses a total of approximately 41.3 square miles (City 2017d). The Northern Division Police Substation is located approximately 4.5 miles north of the BASASP area at 4275 Eastgate Mall, in the University community.

The citywide staffing ratio for police officers to population ratio is 1.34 sworn officers per 1,000 residents (City 2017g). The SDPD has personnel on duty and available to respond to calls for service 7 days a week, 24 hours a day. SDPD currently utilizes a multi-level priority dispatch system, with different response-time guidelines for different call types. Calls for service range from level "1 priority," meaning life-threatening/suspicious activity, to level "4 priority" related to non-life-threatening/suspicious activity. Priority E calls, meaning imminent threat to life, receive the highest priority.

As indicated in Table 5.13-4, *Beats 113, 116, and 122 Call Priority Response Times*, the average response times for Priority E calls for Beats 113, 116, and 122 are above the General Plan response time guidelines for some Call Priority levels.

**Table 5.13-4
BEATS 113, 116, AND 122 CALL PRIORITY RESPONSE TIMES**

Call Priority	General Plan Response-Time Guidelines¹	2016 Average Response Times (Beat 113)	2016 Average Response Times (Beat 116³)	2016 Average Response Times (Beat 122)	2016 Actual Average Response Times (Citywide)
Priority E – Imminent threat to life	Within 7 minutes	8.2	8.6	6.4	7
Priority 1 – Serious crimes in progress	Within 12 minutes	20.3	21.8	17.1	16
Priority 2 – Less serious crimes with no threat to life	Within 30 minutes	49.1	55.8	48.1	42
Priority 3 – Reported after a crime has been committed	Within 70 minutes	118.5	127.2	126.3	100
Priority 4 – Parking complaints and lost and found reports	Within 70 minutes	225.8	290.2	181.6	151

Sources: City 2008a; City 2017g

5.13.1.3 Parks and Recreation

The General Plan standard for population-based parks is 2.8 useable acres per 1,000 residents, which can be achieved through a combination of neighborhood and community park acreages and park equivalencies. The BASASP area is within two community planning areas as delineated by the City's Planning Department, including the Pacific Beach community, west of I-5, and the Clairemont Mesa community, east of I-5. The most recent household population estimates are as of March 2017 and include 45,485 residents in Pacific Beach and 80,337 residents in Clairemont Mesa, for a total of 125,822 residents (SANDAG 2017). These existing population estimates warrant approximately 127.36 acres of population-based parks in Pacific Beach and 225 acres in Clairemont Mesa. There are an estimated 46.45 acres of usable population-based parkland in Pacific Beach and about 112 acres in Clairemont Mesa, resulting in a deficiency of approximately 80.91 acres in Pacific Beach and approximately 104.07 acres in Clairemont Mesa of usable acres of population-based parks.

The General Plan standard for population-based recreation facilities is one 17,000 square foot Recreation Center for every 25,000 residents and one Aquatic Complex for every 50,000 residents. The existing population estimates in the Pacific Beach community warrant approximately 30,929.80 square feet of Recreation Centers and approximately 0.91 Aquatic Complexes and in the Clairemont Mesa community warrant approximately 54,629.16 square feet of Recreation Centers and approximately 1.61 Aquatic Complexes. There are an estimated 15,044 square feet of Recreation Centers and no Aquatic Complexes in Pacific Beach and approximately 18,933 square feet of Recreation Centers and one Aquatic Complex in Clairemont Mesa.

The Pacific Beach community contains seven population-based parks and four joint-use facilities ranging in size between approximately 0.06 useable acres and 19.05 useable acres, including Pacific Beach Community Park, Kate Sessions Memorial Park, Capehart Neighborhood Park, Pacific Beach

Neighborhood Park, Palisades Park North and South, Color Mini-Park, and joint-use facilities with four schools (Pacific Beach Middle, Pacific Beach Elementary, Crown Point Elementary, and Bayview Terraces Elementary). Pacific Beach also has one Recreation Center, Pacific Beach Recreation Center, which serves the community. While all of these facilities are within the larger community of Pacific Beach, they are located outside of the BASASP area.

The Clairemont Mesa community includes four joint-use facilities at schools and 13 population-based parks, including five community parks, and seven neighborhood parks. Parks range in size between approximately 2.30 useable acres and 33.92 useable acres and include Cadman Community Park, North Clairemont Community Park, Olive Grove Community Park, South Clairemont Community, Hickman Field, Tecolote Community Park, East Clairemont Athletic Area, Gershwin Neighborhood Park, Lindbergh Neighborhood Park, MacDowell Neighborhood Park, Mount Acadia Neighborhood Park, Mount Etna Neighborhood Park, and Western Hills Neighborhood Park. Joint-use facilities in the Clairemont Mesa community are located at Alcott Elementary, Cadman Elementary, Field Elementary and Marston Middle Schools. Clairemont Mesa also has three Recreation Centers (Cadman Recreation Center, South Clairemont Recreation Center, and North Clairemont Recreation Center) as well as one Aquatic Complex, Clairemont Aquatic Complex, which serve the community. All of the above listed park and recreation facilities are located outside of the BASASP area.

5.13.1.4 Schools

The BASASP area is served by the San Diego Unified School District (SDUSD), which serves students from kindergarten through 12th grade. The SDUSD serves the City with 113 elementary schools, 24 middle schools, four atypical schools, 10 alternative schools, 27 high schools, and 25 charter schools. Table 5.13-5, *School Enrollment and Capacity*, shows the current capacity and enrollment numbers available for the schools that would serve student-aged populations within the BASASP area. As shown, seven of the eight schools have additional capacity and one school (Toler Elementary) is at capacity. There are no existing or planned schools within the BASASP area.

Table 5.13-5
SCHOOL ENROLLMENT AND CAPACITY

School	Address	Estimated Capacity	2016-2017 Enrollment	2017-2018 Enrollment
Elementary				
Cadman	4370 Kamloop Avenue	268	199	201
Crown Point	4033 Ingraham Street	390	361	355
Sessions	2150 Beryl Street	At Capacity	497	536
Toler	3350 Baker Street	312	241	244
Middle				
Pacific Beach	4676 Ingraham Street	950	742	753
Marston	3799 Clairemont Drive	1,125	689	663
High				
Mission Bay	2475 Grand Avenue	1,687	1,060	1,092
Clairemont	4150 Ute Drive	1,455	960	921

Source: SDUSD 2017a and 2017b

5.13.1.5 Libraries

The BASASP area is within the service area of the City Library System. Each service area for a library is two miles, although the area served depends on the proximity and access to residential, commercial, and civic uses, as well as roadways and transit. The City's General Plan establishes a minimum of 15,000 square feet of dedicated library space for branch libraries. In addition, branch libraries should ideally serve a resident population of 30,000.

Using the two-mile service area metric, the BASASP area is currently served by three San Diego Public Library branch libraries, none of which are within the BASASP area. Each library, its distance from the BASASP area, and its size are included below:

- The Pacific Beach/Taylor Branch Library is located about 1.67 mile west of the BASASP area at 4275 Cass Street. This branch includes 12,484 square feet of building area.
- The Clairemont Branch Library is located about 1.20 miles southeast of the BASASP area at 2920 Burgener Boulevard. This branch includes 4,437 square feet of building area. The Clairemont Mesa Community Plan recommends replacing the existing library with a 10,000-square-foot library.
- The North Clairemont Branch Library is located about 1.20 miles northeast of BASASP area at 4616 Clairemont Drive. This branch includes about 5,136 square feet of building area.

None of these three libraries meet the 15,000-square foot standard requirement of the General Plan and there are no plans to build a new library in the BASASP area.

5.13.2 Regulatory Framework

The Public Facilities, Services and Safety (Public Facilities) Element; Recreation Element; and Mobility Element of the City's General Plan include policies addressing the public services and facilities discussed in this section. In addition to essential public facilities and services such as Fire-Rescue, Police, Libraries, and Schools, the Public Facilities Element also includes policies that apply to park and recreation facilities and services, with additional guidance from the Recreation Element. The Public Facilities Element also includes a public facilities financing strategy, prioritization guidelines, and policies for new growth to pay its fair-share contribution towards public facility improvements. Relevant standards, policies, and ordinances are summarized below.

5.13.2.1 Fire Protection

The Fire-Rescue Department has an active program that promotes the clearing of canyon vegetation away from structures in accordance with Section 142.0412 of the City's Municipal Code and the SDFD's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on city property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the SDFD (per SDMC Section 142.0412(i) or a previously recorded entitlement requires a width more or less than the standard 100 feet). Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies, and standards are

located in the Public Facilities, Services, and Safety Element of the General Plan and the Fire-Rescue Services Department's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services, and Safety Element and summarized below (per Policy PF-D.1):

- To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.
- To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to five medical patients at once.
 - This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as the community grows (per Policy PF-D.2), fire unit deployment performance measures are established based on population density zones and are provided in Table 5.13-2. Population-based performance measures used to plan for needed facilities (per Policy PF-D.2) are identified in Table 5.13-3

5.13.2.2 Police Protection

As specified in the Facilities Element, Policy PF-E.2, the City goal is to maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

5.13.2.3 Parks and Recreation

The General Plan Recreation Element provides standards for population-based parks and recreation facilities, which include recreation centers and aquatic complexes. The standard for population-based parks is 2.8 usable acres per 1,000 residents (per Recreation Element Policy RE-A.8), which can be achieved through a combination of neighborhood and community parks and park equivalencies (Recreation Element Policy RE-A.9). The standard for a recreation center is a minimum of

17,000 square feet per recreation center to serve a population of 25,000 (Recreation Element Table RE-3). The standard for an aquatic complex is one per 50,000 people or within approximately 6 miles (Recreation Element Table RE-3).

5.13.2.4 Schools

Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address increased enrollment that may result. Senate Bill (SB) 50, enacted on August 27, 1998, revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit.

5.13.2.5 Libraries

The City's General Plan establishes a minimum of 15,000 square feet of dedicated library space for branch libraries (per Public Facilities Element PF-J.2).

5.13.3 Significance Determination Thresholds

According to the City's CEQA Significance Determination Thresholds (City 2016a), as modified to reflect a programmatic analysis, a potential significant impact to public services would occur if implementation of the proposed BASASP would:

1. Promote growth patterns that would result in the need for and/or provision of new or physically altered public facilities (including fire protection, police protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

5.13.4 Issue 1: Public Services

Would the proposed BASASP promote growth patterns that would result in the need for and/or provision of new or physically altered public facilities (including fire protection, police protection, parks or other recreational facilities, schools, or libraries), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

5.13.4.1 Impacts

Additional development resulting from implementation of the proposed project would increase demand for public services and facilities within the BASASP area. Significant physical impacts could result if this increased demand necessitates the expansion of existing or construction of new public facilities.

Fire Protection

Implementation of the proposed project would result in an increased population within the BASASP area, thus increasing the demand for fire protection services. Development within the BASASP area would be constructed per applicable California Building and Fire codes and NFPA codes and would be required to pay Development Impact Fees (DIFs), which ~~would be used~~ to fund future facilities, including planned fire stations. The SDFD has an adequate number of facilities and staffing to serve the BASASP area. Although implementation of the proposed project would result in increases in fire calls for service, no new facilities or improvements to existing facilities would be required as a result of the proposed project.

Police Protection

The projected population for the BASASP area at build-out under the proposed project is estimated to be 9,411 residents; the existing population is estimated to be 2,318. This increase in population would result in a proportionate increase in demand for police protection services. As shown in Table 5.13-4, the average response times for Beat 113 and 116 are above both the citywide average and General Plan goals for all types of calls. Beat 122 average response times are above citywide average and General Plan goals for all types of calls except for Priority E. Police response times in this community could potentially increase with the build-out of the proposed project. The SDPD strives to maintain the response time goals as one metric used to assess the level of service to the community. The citywide staffing ratio for police officers to population is 1.34 sworn officers per 1,000 residents (City 2017g). However, SDPD does not staff individual stations based on the sworn officers per 1,000-population ratio. Although implementation of the proposed project would result in increases in police protection calls for service, no new facilities or improvements to existing facilities would be required as a result of the proposed project.

Parks and Recreation

As discussed under Existing Conditions, the Pacific Beach and Clairemont Mesa communities are currently deficient in public park space. Implementation of the proposed project would increase residents in the BASASP area and the BASASP does not propose additional parkland. Thus, a deficit of parkland in the community would continue with buildout of the proposed project.

The proposed project is not required to address the current or projected deficits. ~~As such, payment of DIFs, collected at the time of building permit are issued for specific future development proposals, would offset the impacts of proposed development on parks and recreation facilities.~~ Implementation of the proposed BASASP would provide policy support for increasing the amount of parkland in the area, but does not propose construction of new facilities. Thus, implementation of the BASASP would result in a less than significant impact associated with the construction of new facilities.

Schools

The increase in population associated with development pursuant to the proposed project would generate additional school-aged children attending schools which serve the BASASP area. Based on the school enrollment and capacity data obtained from the SDUSD, school-aged children associated with future development in accordance with the proposed project would not exceed the capacity

and school sizing goals for middle or high schools in the area. While Sessions Elementary School is currently at capacity, there are three additional elementary schools with available capacity and it is not anticipated that new schools would be needed to accommodate buildout of the BASASP area. Additionally, verification from SDUSD would be required for all future development and payment of school fees would be mandated at the time building permits are requested.

Libraries

As indicated earlier, the size of existing libraries serving the BASASP area does not meet the General Plan standard for a library. No new libraries are included as part of the proposed project and, similar to the discussion for parks and recreation, the project is not required to address deficits. As such, payment of DIFs, collected at the time of building permits are issued for specific future development proposals, would offset the impacts of a proposed development on libraries.

5.13.4.2 Significance of Impacts

Fire

The SDFD currently provides adequate service to the BASASP area, and adequate fire protection is expected to be available to meet the needs of future development in accordance with the proposed project. Thus, no new fire facilities which could result in physical impacts on the environment would need to be constructed, and impacts related to fire protection services would be less than significant.

Police

Although the SDPD currently provides adequate service to the BASASP area, it is difficult to forecast future demand and need for potential future facilities or staffing needs. Changes to police staffing or facilities, if any, would be dependent on division and citywide needs as determined by the SDPD. The SDPD does not plan future operational needs based on individual projects such as those that would be implemented under the proposed project. Thus, no new construction of police facilities which could result in physical changes to the environment would occur as a result of implementation of the proposed project. Consequently, impacts related to police services would be less than significant.

Parks and Recreation

The amount of parkland available in the BASASP would be inadequate to meet the demand at buildout. The use of park equivalencies, as defined in the General Plan, could be appropriate to satisfy the deficit of some population-park needs. This could be done by expanding the programs and hours of operation for existing recreation centers, per the approval of a park equivalency application. However, such measures may not provide enough credits to offset population-based park deficits.

The funding of recreational facilities is an implementation policy in the General Plan. If new parkland or recreational facilities are required as part of a development project, potential environmental effects would be analyzed on a case-by-case basis to ensure that population-based parks are provided for, either through development of park and recreation facilities or payment of

development impact fees, or other appropriate fees. If new parkland or recreational facilities are proposed as part of a development project, potential environmental effects would be analyzed at that time.

Provision of additional parkland to serve the community could result in a physical impact on the environment which could be significant. However, there are no specific plans for additional parks at this time. The construction of new park facilities would be subject to separate environmental review at the time design plans are available. Therefore, at this program-level, impacts related to the provision of new park and recreation facilities within the BASASP area would be less than significant.

Schools

As previously discussed, Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50 revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. The school district will be responsible for potential expansion or development of new facilities. Therefore, impacts to schools resulting from future development would be less than significant through implementation of SB 50.

Libraries

There are no libraries proposed in the BASASP. Thus, no new construction of library facilities, which could result in physical changes to the environment would occur as a result of implementation of the proposed project. Consequently, impacts related to library service would be less than significant.

5.13.4.3 Mitigation Framework

~~Developer fees, such as school impact fees, DIFs, and other appropriate fees would contribute toward minimizing impacts to~~ No new fire protection, libraries, parks and recreational facilities, and schools are proposed as part of the BASASP. Future development proposals under the proposed project would be required to pay applicable impact fees prior to the issuance of building permits. The construction of any new or altered public facilities that may be needed would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Evaluating potential environmental impacts at this time would be speculative as the location and design of these new facilities is unknown. Therefore, impacts would be less than significant at the programmatic level, and no mitigation measures are required.

5.13.4.4 Significance After Mitigation

Impacts to public services would be less than significant.

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5.14 Public Utilities

5.14.1 Existing Conditions

5.14.1.1 Water Supply

City of San Diego

The City's PUD provides water services to 1.3 million customers through a water system that serves over 200 square miles of developed land. The BASASP area is located within this service area. The City's PUD imports nearly 90 percent of its water from other areas such as northern California and the Colorado River. To do this, the PUD purchases imported water from the San Diego County Water Authority (Water Authority). The Water Authority was formed for the purpose of purchasing Colorado River water from The Metropolitan Water District of Southern California (MWD) for conveyance to San Diego County.

The City's water system consists of a large network of infrastructure connecting residents and businesses to the water supply. The City's water system includes nine surface raw water storage reservoirs, three water treatment plants, 32 potable water storage facilities, approximately 3,300 miles of water transmission and distribution pipelines, and 49 water pump stations. The City runs three water treatment operations—Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant—with a total of 298 million gallons per day (mgd) capacity.

The City also runs two recycled water facilities. The North City and South Bay Water Reclamation Plants were built to treat wastewater to a level that would be approved for non-potable uses such as landscape irrigation and manufacturing. These facilities provide water to City residents and businesses, as well as other jurisdictions and water districts.

Established in 1985, the PUD's Water Conservation Program was established to reduce San Diego's dependence on imported water. Savings are achieved through the implementation of programs, policies, and ordinances promoting water conservation practices. All residential, commercial, and industrial buildings are required to be certified as having water-conserving plumbing fixtures in accordance with Municipal Code Chapter 14, Article 7, Division 4. The PUD works in collaboration with the MWD and the Water Authority to formulate new conservation initiatives, and annually checks progress toward conservation goals.

The City's 2015 Urban Water Management Plan (UWMP) was developed to serve as the City's overarching water resources planning document to address the City's water system, water demand, water supply resources, conservation efforts, and historic and projected water use. This Plan was prepared in accordance with the Urban Water Management Act, requiring urban water suppliers to adopt and submit a plan every five years to the California Department of Water Resources. Every urban water supplier providing water for municipal purposes to more than 3,000 connections or supplying more than 3,000-acre feet (AF) of water annually must comply.

The PUD also adopted the Long-Range Water Resources Plan in 2013. This Plan provides guidance and input on alternative strategies for meeting San Diego's water needs through 2035 by addressing

concerns such as population growth and water resource diversification. The Plan details existing water supplies, new water supply opportunities, objectives, performance measures, and conclusions and recommendations.

In accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects are required to implement sustainable landscape design and to use recycled water to the maximum extent feasible in development projects to aid in water conservation (City 2008a).

The Metropolitan Water District of Southern California

The MWD was formed in 1928 to develop, store, and distribute supplemental water in Southern California for domestic and municipal purposes. The MWD is a wholesale supplier of water to its member agencies, which includes the Water Authority. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueducts, which it owns and operates. It also obtains water supplies via the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) help to ensure the reliability of water supplies and the infrastructure necessary to provide water to Southern California.

MWD's IWRP was updated in 2015 to accommodate recent changes in retail demands, water use efficiency, and local and imported supplies, and to update resource targets. The IWRP sets reliability targets to identify developments in imported and local water supply and in water conservation to reduce water shortages and mandatory restrictions. These regional targets are set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers. MWD's 2015 RUWMP, adopted in June 2016, documents the availability of these existing supplies and additional supplies required to meet future demands. It includes the resource targets in the IWRP and contains an assessment of water supply reliability. The Long-Term Conservation Plan was implemented in July 2011 with the goal to achieve the conservation target in MWD's 2010 IWRP as well as to pursue water efficiency innovations and to transform the public's perception of the value of the regional water supply.

San Diego County Water Authority

The Water Authority is an independent public agency that serves as the County's regional water wholesaler. As a retail member agency of the Water Authority, the PUD purchases water from the Water Authority for retail distribution within its service area.

The Water Authority's 2015 UWMP was adopted by the Water Authority Board in June 2016 in accordance with state law and the RUWMP. The 2015 Plan contains a water supply reliability assessment that identifies a diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year, and multiple-dry year periods. The UWMP documents that although no shortages are anticipated during a normal year through 2040, shortages may occur during a single-dry year starting in 2035, and during a multiple-dry water year event starting in 2028. The Water Authority also prepares an annual water supply report providing updated documentation on existing and projected water supplies.

5.14.1.2 Water Distribution

The BASASP area is serviced by the City's Pacific Beach 307, University Heights 390, and Northwest Mesa 559 Pressure Zones. The BASASP area is served in both the Alvarado and Miramar Water Treatment Plants.

The City has planned water line replacement projects identified in the BASASP area that will be completed between 2017 and 2022 to replace old or undersized water mains. The City currently requires water mains to be 8-inches in minimum diameter and 12-inches in commercial zones for fire flow requirements (RRM 2017).

5.14.1.3 Wastewater Collection, Treatment, and Disposal

The City's PUD provides wastewater collection, treatment, and disposal services to the San Diego region, including the BASASP area, through its Metropolitan Sewerage Sub-System. The Metropolitan Sewerage Sub-System treats the wastewater from the City of San Diego and 15 other cities and districts from a 450-square mile area with a population of over 2.2 million. The system treats an average of 180 million gallons of wastewater each day. Sewage collected is conveyed and processed through a sewer infrastructure system and ultimately discharges at the Point Loma Wastewater Treatment Plant.

Sewer flows generated within the BASASP area are conveyed to the East Mission Beach Trunk Sewer, which then conveys wastewater to Pump Station 2, located south of the BASASP area on North Harbor Drive. The average daily flow into Pump Station 2 is approximately 180 million gallons. This station then pumps wastewater to the Point Loma Wastewater Treatment Plant through two 87-inch diameter force mains. Wastewater is ultimately discharged into the Pacific Ocean via the Point Loma Ocean Outfall, a 12-foot diameter 4.5-mile outfall.

The City has planned sewer line replacement projects identified in the BASASP area that will be completed between 2017 and 2018 to replace old sewer lines. The sewer lines in the BASASP area are divided into two classifications: small sewer mains and larger sewer trunks. The mains convey flow to the larger diameter trunk lines (RRM 2017).

5.14.1.4 Storm Water Conveyance

As discussed in Section 5.9, *Hydrology, Water Quality, and Drainage*, storm water runoff originating in the BASASP area is conveyed to receiving waters via streets, gutters, cross gutters, open channels, and storm drain systems. The BASASP area is located within the Mission Bay Watershed Management Area, and storm water is generally conveyed to the Rose Creek channel, which empties into Mission Bay.

5.14.1.5 Solid Waste Management

The City provides collection service to some residential developments on public streets pursuant to the People's Ordinance (Municipal Code Section 66.0127). Waste generators that do not qualify for City service contract directly with one of the hauling companies franchised by the City to provide collection service.

Recyclable materials are taken to any of several materials recovery facilities. Green waste and food waste are taken to an organic material processing facility such as the Greenery operated by the City at the Miramar Landfill. The Miramar Landfill also accepts solid waste for disposal. Republic Services, locally known as Allied, also operates a landfill located within the City, Sycamore Sanitary Landfill, and the Otay Landfill, situated on unincorporated land within Chula Vista.

According to their respective Solid Waste Facility Permits, the Miramar Landfill is permitted to receive a maximum of 8,000 tons per day, the Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day, and the Otay Landfill is permitted to receive 6,700 tons per day. The Otay Landfill is projected to close in 2030, and Sycamore Landfill is projected to close in 2042 (CalRecycle 2017). The Miramar Landfill is expected to close in 2030 (City 2015).

5.14.1.6 Electricity and Natural Gas

As discussed in Section 5.4, *Energy Conservation*, electricity and natural gas for the BASASP area are provided by SDG&E. See Section 5.4 for additional information regarding electrical service.

5.14.1.7 Communications

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Spectrum, and other independent cable companies. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects. Individual projects consisting of more than four lots are subject to Municipal Code Section 144.0240, which requires privately owned utility systems and service facilities to be placed underground.

5.14.2 Regulatory Framework

5.14.2.1 Water Supply Assessment and Verification

SB 221 and SB 610 went into effect in January 2002 with the intention of linking water supply availability to land use planning by cities and counties. SB 610 requires water suppliers to prepare a Water Supply Assessment (WSA) report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of a large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential developments of more than 500 units; shopping centers or businesses employing more than 1,000 people; shopping centers or businesses having more than 500,000 square feet of floor space; commercial office buildings employing more than 1,000 people; and/or commercial buildings having more than 250,000 square feet of floor space or occupying more than 40 acres of land.

5.14.2.2 Storm Water Facilities

Per San Diego City Council Policy 800-04, private land owners/developers are responsible for providing adequate storm water drainage facilities, which are subject to review and approval by the City. Council Policy 800-04 states it is the basic responsibility of any owner or holder of land to accept and provide a suitable conveyance of storm water runoff, and that the cost of construction will be borne by the property owner or permittee. All continuing maintenance of such facilities becomes the responsibility of the property owner on whose land the facilities are located. The City's Transportation and Storm Water Department is only responsible for maintaining and upgrading public storm water drainage facilities that occur on City-owned land, and areas where easements have been granted to and accepted by the City.

5.14.2.25.14.2.3 Solid Waste

The California Legislature passed AB 939 to address landfill capacity and solid waste concerns in 1989. The Integrated Waste Management Act mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. The law also required local governments to prepare Source Reduction and Recycling Elements detailing how these reductions would be achieved. In 2011, the State enacted AB 341, which established a policy goal for California of 75 percent recycling, composting, or source reduction of solid waste by 2020. In July 2012, the City updated the Recycling Ordinance to lower the exemption threshold for required recycling, thereby requiring all privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week to recycle. The City is currently at a 66 percent diversion rate (City 2017).

Pursuant to the City's CEQA Significance Determination Thresholds, any land development project that may generate approximately 60 tons of waste or more during construction and/or operation is required to prepare a project-specific Waste Management Plan (WMP) to address disposal of waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals.

5.14.3 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City 2016a), as modified to guide a programmatic analysis of the proposed BASASP, a significant impact to public utilities would occur if implementation of the proposed BASASP would:

1. Result in the use of excessive amounts of water beyond projected available supplies;
2. Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives;
3. Result in impacts to solid waste management, including the need for construction of new solid waste management facilities; or result in a land use plan that would not promote the achievement of a 75 percent target for waste diversion and recycling as specified under AB 341; or
4. Result in the use of excessive amounts of electrical power, fuel, or other forms of energy.

5.14.4 Issue 1: Water Supply

Would the proposed BASASP result in the use of excessive amounts of water beyond projected available supplies?

5.14.4.1 Impacts

A WSA was prepared for the proposed project (City 2018) by the PUD in compliance with SB 610 to assess whether sufficient water supplies are, or will be, available to meet the projected water demands of the proposed project during a normal, single-dry year, and multiple-dry year period during a 20-year projection. The WSA is included as Appendix J to this PEIR. The WSA identifies existing water supply entitlements, water rights, water service contracts or agreements relevant to the identified water supply for the proposed project, and quantities of water received in prior years pursuant to those entitlements, rights, contracts, and agreements.

The MWD and the Water Authority have developed water supply plans to improve reliability and reduce dependence on existing imported supplies. MWD's RUWMP and IWRP, and the Water Authority's 2015 UWMP and annual water supply report include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

As discussed in the WSA, the City's and Water Authority's 2015 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur by 2040. Based on a normal water supply year, the estimated water supply projected in five-year increments for a 20-year projection will meet the City's projected water demand of 200,984 acre-feet (AF) in 2020; 242,038 AF in 2025; 264,840 AF in 2030; 273,748 AF in 2035; and 273,408 AF in 2040. Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 213,161 AF in 2020; 256,883 AF in 2025; 281,167 AF in 2030; 290,654 AF in 2035; and 290,292 AF in 2040. Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 208,665 AF in 2020; 251,402 AF in 2025; 275,139 AF in 2030; 284,412 AF in 2035; and 284,058 AF in 2040.

As demonstrated in the WSA, based on the City's and Water Authority's 2015 UWMPs, there is sufficient water planned to supply the proposed project's estimated annual average usage. The estimated water demands of the proposed project are 6,539,148 gallons per day, or 7,324.8 AF per year. In the City's 2015 UWMP, the planned water demand of the project area is 6,589,295 gallons per day, or 7,380.9 AF per year in 2040. As a result, the water demand of the proposed project would result in no unforeseen demands.

In summary, the WSA concluded that the proposed project is consistent with the water demands assumptions included in the regional water resource planning documents of the Water Authority and MWD. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the Water Authority, and MWD to serve the projected demands of the project area, in addition to existing and planned future water demand of the PUD. Therefore, impacts related to water supply would less than significant.

5.14.4.2 Significance of Impacts

Based on the findings of the WSA, there is sufficient water supply to serve existing and projected demands of the proposed project, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, impacts of the proposed project on water supply would be less than significant.

5.14.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.14.4.4 Significance After Mitigation

Impacts would be less than significant.

5.14.5 Issue 2: Utilities

Would the proposed BASASP promote growth patterns resulting in the need for and/or provision of new or physically altered utilities the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

5.14.5.1 Impacts

The City's General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed project would result in infill, redevelopment, and an increase in population within selected areas as stated in the proposed BASASP. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure as well as various communications systems. However, some infrastructure such as aging pipelines are in need of replacement. The BASASP area's existing infrastructure deficiencies would require capacity improvements and replacement schemes to serve the existing and projected population. In addition, site-specific analysis would be conducted at the project level to determine the potential conflicts of future development projects implemented under the proposed project with existing utility infrastructure. The following analysis details the significance of impacts under CEQA for each applicable utility.

Water Distribution

The BASASP proposes zoning changes that would increase development intensity, including mixed-use commercial/residential, and high-density residential. As future development projects implemented under the proposed project move forward, focused site-specific studies would be required to address water service, including meeting any new fire flow requirements. Commercial and mixed-use projects would be required to upsize water mains to 12-inches in diameter where existing water mains are undersized. Asbestos Cement (AC) pipelines in many areas of the City, are aging and in need of replacement over the next 10 to 20 years. A large portion of the existing water system in the BASASP area consists of AC pipelines. Therefore, as the BASASP area redevelops in accordance with the proposed project, the City may determine, and assist in, funding pipeline

replacement projects, concurrent with roadway improvements, to enhance the service reliability of the water system.

Wastewater Collection, Treatment, and Disposal

The City's wastewater infrastructure constantly requires continued upgrades and replacements to maintain the system. Planned improvements to existing facilities would increase City wastewater treatment capacity to serve an estimated population of nearly 3 million through the year 2050 when nearly 340 mgd of wastewater are anticipated to be generated. As individual development projects are initiated under the proposed project, localized improvements to the wastewater system would be required as part of the project design and review.

Storm Water Conveyance

Because the BASASP area is highly impervious, the volume or rates of runoff are not likely to be increased by new development. It is more likely that the volume and rate of runoff could be slightly decreased due to storm water quality regulations which require implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation.

In addition, the proposed BASASP contains goals and policies within the Urban Design chapter to improve drainage patterns and decrease surface runoff. Policies 4.4.7 and 4.4.8 encourage the consideration of storm water filtration and retention features during pedestrian and street upgrades, including bulb outs and medians. Policy 4.4.9 encourages bioswales, pervious strips, flow-through planters, and pervious pavement throughout the BASASP area to help filter storm water runoff. The Conservation chapter of the proposed BASASP lists policies to improve runoff management through LID techniques. Policies 7.2.1 through 7.2.3 address various aspects of storm water management, including incorporation of LID practices into building design and site plans that work with the natural hydrology of a site, guidance to manage storm water using LID principles for public and private development proposals, and prioritization of practices to minimize reliance on storm drains that could be impaired by sea level rise. These policies support installation of infrastructure to capture and minimize storm water runoff.

Communications

The existing communications services are expected to be able to serve future development within the BASASP area without major physical improvements.

5.14.5.2 Significance of Impacts

As stated above, systematic improvements to water, wastewater, and storm water facilities throughout the BASASP area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process. Upgrades to water and sewer are administered by the PUD, and are handled on a project-by-project basis. Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Transportation and Storm Water Department (T&SW). Per City Council Policy 800-04, private land owners and developers are responsible for upgrading and maintaining storm water drainage facilities on private property. ~~The necessary infrastructure~~

~~improvements and analysis of potential conflicts with existing utility infrastructure would be standard practice for new development to maintain and/or upgrade the existing system and would occur at the project level as development projects under the proposed project are proposed and implemented. Future development projects will be reviewed by the City to determine any significant adverse effects to the City's storm water system, as well as any significant impacts associated with the installation of new storm water infrastructure, and these significant impacts would be avoided.~~ Therefore, impacts to water, sewer, and storm water utilities would be less than significant.

Given that utility and communications providers have the capacity to serve the BASASP area, impacts would be less than significant.

5.14.5.3 Mitigation Framework

Impacts to water, wastewater, and storm water facilities, as well as communications services would be less than significant; therefore, no mitigation is required.

5.14.5.4 Significance After Mitigation

Impacts to water, wastewater, and storm water facilities, as well as communications services would be less than significant.

5.14.6 Issue 3: Solid Waste Management

Would the proposed BASASP result in impacts to solid waste management, including the need for construction of new solid waste management facilities; or result in a land use plan that would not promote the achievement of a 75 percent target for waste diversion and recycling?

5.14.6.1 Impacts

Development projects that would result from implementation of the proposed project must comply with City ordinances related to solid waste (as identified in Section 5.14.2.2). Projections indicate diversion rates achieved through compliance with these ordinances achieves less than 40 percent diversion, which falls short of the 75 percent diversion target. Discretionary projects which have the potential to generate 60 tons or more of solid waste would be required to prepare a project-specific WMP.

Projects that would typically exceed this threshold include the construction, demolition, and/or renovation of 40,000 square feet or more of building space. It is anticipated that the solid waste disposal needs of future residents and businesses would increase as a result of implementation of the proposed project. Future developments allowed under the proposed project would be evaluated on a project-specific basis for potential impacts to solid waste facilities.

5.14.6.2 Significance of Impacts

It is anticipated that implementation of the proposed project would increase the solid waste management needs within the BASASP area. The proposed project ~~would not attract additional development within the City, but rather~~ would provide more concentrated land uses within the

BASASP area. When land uses are more concentrated, per-unit environmental impacts associated with solid waste management, such as collection truck miles per ton collected, are reduced. Greater efficiencies and expanded opportunities for the recycling of marginally marketable items becomes more feasible. Future development projects that would result from implementation of the proposed project must comply with the Municipal Code. In addition, any future discretionary development exceeding the 60-ton threshold must prepare a WMP targeting a 75 percent waste reduction. Therefore, impacts to solid waste management would be less than significant.

5.14.6.3 Mitigation Framework

Impacts to solid waste management would be less than significant; no mitigation is required.

5.14.6.4 Significance After Mitigation

Impacts to solid waste management and facilities would be less than significant.

5.14.7 Issue 4: Energy

Would the proposed BASASP result in the use of excessive amounts of electrical power, fuel, or other forms of energy?

5.14.7.1 Impacts

As discussed in detail in Section 5.4, *Energy Conservation*, future development pursuant to the proposed project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Similarly, energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the proposed BASASP would avoid excessive energy consumption from operations associated with future development pursuant to the proposed project.

5.14.7.2 Significance of Impacts

As discussed in detail in Section 5.4, short-term and long-term energy impacts would be less than significant.

5.14.7.3 Mitigation Framework

Impacts would be less than significant; no mitigation is required.

5.14.7.4 Significance After Mitigation

Impacts related to energy usage would be less than significant.

5.15 Transportation/Circulation

The following section summarizes the Traffic Impact Study (TIS) for the BASASP prepared in December 2017 by Kimley-Horn and Associates (Kimley-Horn 2017). The complete TIS is included as Appendix K of this PEIR.

The TIS discusses the existing conditions, significance determination thresholds, and potential impacts of the proposed BASASP, and identifies mitigation measures where required. Pedestrian, bicycle, transit, and vehicular modes of transportation are evaluated. The TIS evaluates street network and associated non-vehicular or transit-oriented amenities under existing conditions, as well as for the projected Horizon Year (2035) with network conditions assumed to be in place at that time with the implementation of the land use changes per the BASASP.

5.15.1 Existing Conditions

The function of the BASASP is to make the Balboa Avenue Station operate at its highest level while balancing a variety of competing considerations. This requires an understanding of the different transportation modes affecting, and affected by, the project. This discussion addresses each of the existing transportation options feeding into the impact analysis in Sections 5.15.4 through 5.15-6, in the following order: Pedestrian Facilities, Bicycle Facilities, Bus and Rail Transit; and Local Vehicular Circulation Network.

5.15.1.1 Pedestrian Facilities

One half-mile is a distance that most pedestrians consider comfortable to walk to access high-frequency transit. A half-mile walkshed was therefore identified from the Balboa Avenue Station platform. This area is shown in Figure 5.15-1, *Existing Pedestrian Walkshed and Transit Stops*.

Existing pedestrian-facilities located within and adjacent to the BASASP area were identified through data provided by the City and supplemented with a review of aerial imagery. These are also shown on Figure 5.15-1. Particularly in the vicinity of the BASASP east of I-5, the segments are not always continuous, as depicted on the figure. It is assumed that residential area streets are walkable, even if no sidewalk currently exists. Some sidewalks are also located within the BASASP area, but beyond the walkshed. Nonetheless, some pedestrians may be willing to walk the distance since some level of connection exists.

The City of San Diego developed a framework of techniques and metrics designed to analyze the core transportation modes, including pedestrians. One of the metrics builds upon the Pedestrian Environmental Quality Index that was developed by the San Francisco Department of Public Health to evaluate pedestrian facilities. The Pedestrian Environment Quality Evaluation (PEQE) assesses the suitability of facilities for pedestrians). The PEQE system considers three facility types—Segments, Intersections, and Mid-Block Crossings—for scoring. Each facility type has four sub-categories, such as speed of adjacent roadway, lighting, and traffic control, which are scored from 0 to 2 points, with improved pedestrian facilities corresponding to a higher score. The sum of the sub-categories scores (a maximum score of 8) is used to assign the final rank. PEQE ranks pedestrian facilities using a score of greater than 6 as “High,” from 4 to 6 as “Medium,” and less than 4 as “Low.” The scoring criteria used in the PEQE analysis can be found in TIS Table 3-1. Current conditions are low, with

best-case connections from the Balboa Avenue Station currently being to the south. Overall, connections to high- or medium-quality pedestrian walkable facilities are rated as being zero percent available to the north and west of the station location, and only 6 percent available to the east and 30 percent available to the south.

5.15.1.2 Bicycle Facilities

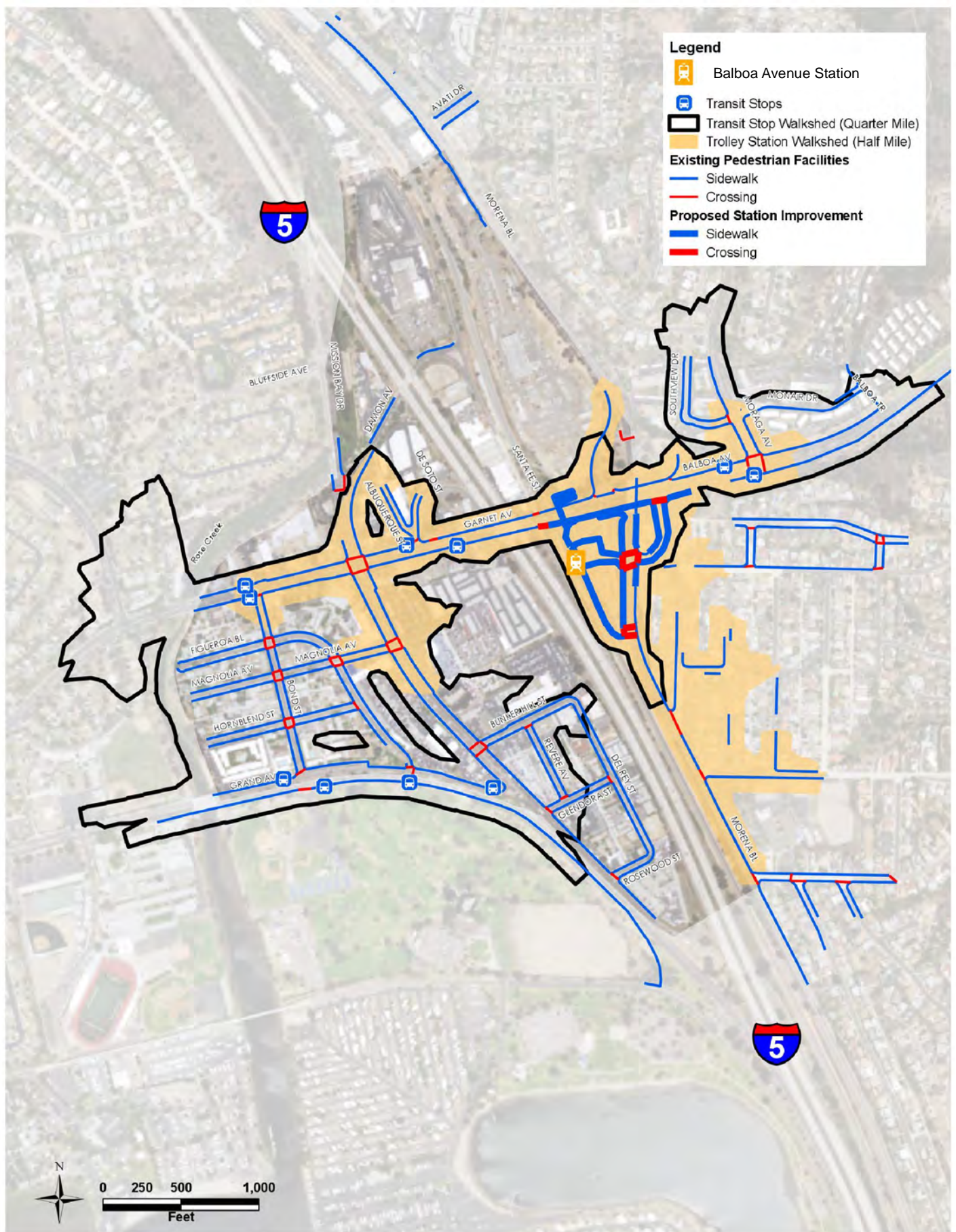
The City has developed a network of designated Class I, II, and III bicycle facilities as part of its Bicycle Master Plan (BMP) (City 2013). A Class I facility is a bike path that provides for bicycles to travel on a paved ROW completely separated from any street or highway. A Class II facility is a bike lane that provides bicycles an exclusive or semi-exclusive lane of travel on a roadway separated by a painted line. A Class III facility is a bike route that provides for a shared use with motor vehicle traffic and is only identified by signage and/or pavement markings. TIS Table 4-5 provides more description and illustrates the types of bikeways identified in the City's BMP.

Two additional bicycle facilities, Cycle Track (referred to as a Class IV bicycle lane by the City) and Bicycle Boulevard, have been adopted into the SANDAG Regional Bike Plan (RBP). A Class IV bicycle lane is a bicycle facility that is located within roadway ROW but is separated from vehicle lanes by a physical barrier. Bicycle Boulevards are roadways with physical improvements such as traffic calming and diversions to provide priority to bicyclists. Bicycle Boulevards are typically installed on local roads with a low volume of vehicles. These two categories are additionally described on TIS Table 4-6.

SanGIS, a data source provided by SANDAG, was referenced to provide a baseline for existing bicycle facilities. Updates and modifications to SanGIS data were completed during field verifications. Existing bicycle facilities immediately adjacent to and within the BASASP boundary are depicted on Figure 5.15-2, *Existing Bicycle Network*. As shown, the existing bicycle network does not include facilities that connect to the vicinity of the future transit station. Facilities are fairly removed from the project vicinity, with a Class I bike path located both north and south of Grand Avenue along Rose Creek at the western extent of the BASASP area, a Class II bike lane extending east-west along Grand Avenue, and a Class III bike route trending northeasterly along Damon Avenue from Rose Creek under I-5 to Santa Fe Street, where it turns northerly. No Class IV facilities are located within the BASASP area.

A Bicycle Level of Traffic Stress (BLTS) analysis was completed to summarize the biking conditions in the Balboa Avenue Station area (refer to the TIS text and Figure 4-6 for additional information). This was based on a Mineta Transportation Institute work (Low-Stress Bicycling and Network Connectivity [2012]) which establishes a methodology for evaluating the level of stress for bicyclists riding on a designated bicycle facility associated with specific factors.

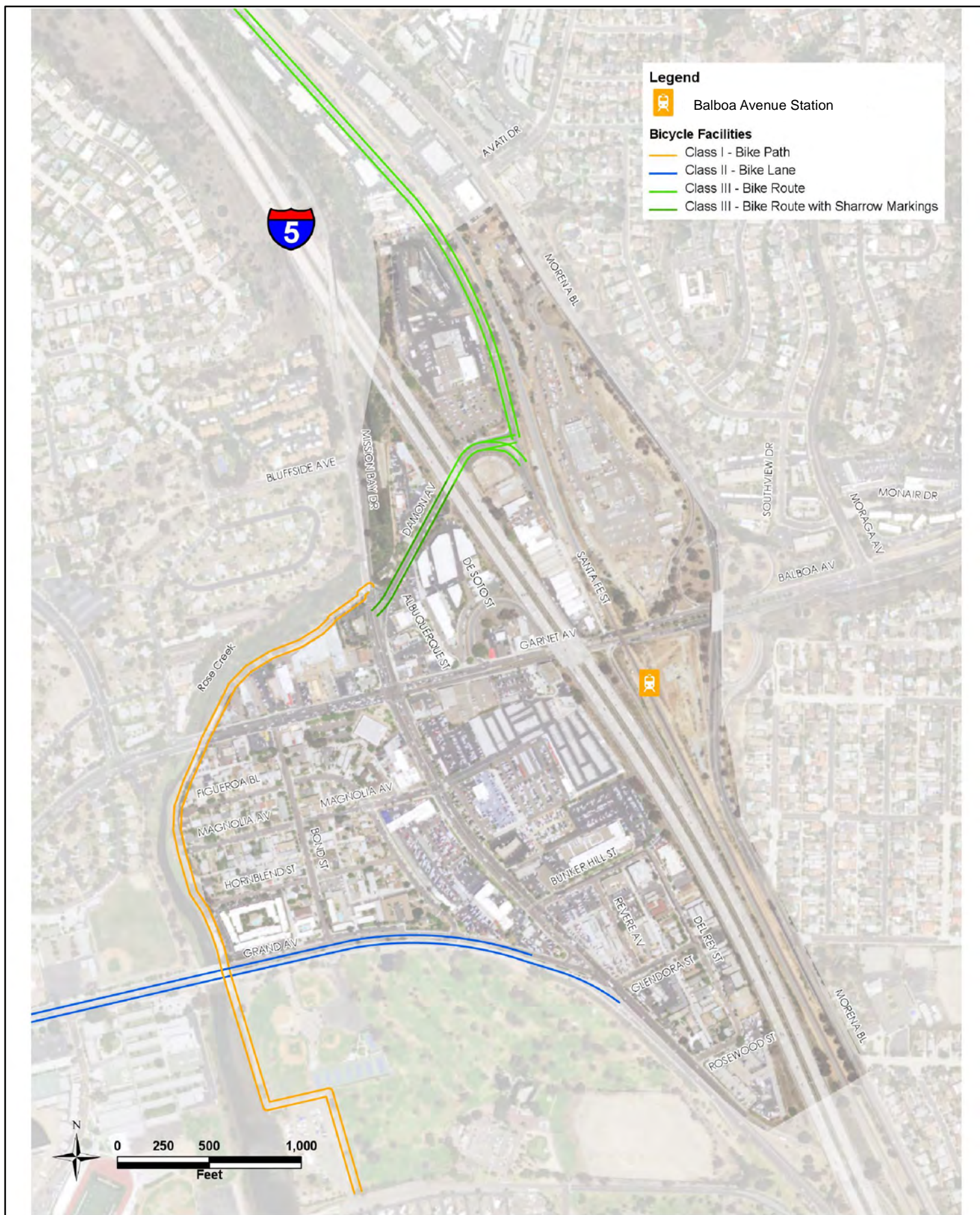
The methodology applies a level of traffic stress (LTS) on a scale of LTS 1 (lowest stress) to LTS 4 (highest stress) using numerous criteria. These criteria (see TIS Tables 3-2 through 3-8 for more detail) include roadway and bike lane classifications, roadway speed limits, bicycle facility type, bike lane and buffer widths, intersection control level and bike lane configuration at intersections, the presence of parking lanes, etc. Data on roadway classifications, speeds, bicycle facility type, and intersection control were compiled using field observations of roadway segments and intersections for classified roadways in the BASASP area. This information was supplemented with measurement estimates and documentation of bike lane configurations at intersections taken from aerial imagery.



Balboa Avenue Station Area Specific Plan

Existing Pedestrian Walkshed and Transit Stops

Figure 5.15-1



LTS 1 facilities present little traffic stress and demand little attention from cyclists. They are suitable for almost all cyclists and attractive enough for a relaxing bike ride. LTS 2 facilities are suitable to most adult cyclists but demand more attention than might be expected from children. LTS 3 starts to introduce a stress level that not all adult cyclists feel comfortable with. LTS 4 is the highest level of stress and may be used by experienced bicyclists or not used at all.

Per the methodology guidance, both directions of a roadway segment are independently assigned a score between LTS 1 and LTS 4 based on the criteria noted above. The resulting directional roadway level of traffic stress is the worst level of stress assigned to a segment from the individual criteria scores.

The results of the BLTS analysis show the percentages assigned to each level of traffic stress score based on linear distance of roadway. A majority of the streets included in the analysis (62 percent) were scored at a high level of stress, or LTS 4. The corridors scoring a LTS of 4 include Garnet Avenue, Grand Avenue, Morena Boulevard, Balboa Avenue, and Mission Bay Drive. These corridors represent the major north/south and east/west connections to the area of the Balboa Avenue Station. The results show access to the planned transit station is difficult along these major corridors due to high speeds and lack of connecting facilities. The residential streets between Garnet Avenue and Grand Avenue, and between Mission Bay Drive and I-5, received low traffic stress scores. Although these streets do not have bicycle facilities, low traffic speeds result in a LTS 1 score. These minor streets currently lack connection to the transit station site.

5.15.1.3 Bus and Rail Transit

Bus Transit

There are currently two bus transit lines providing access to the BASASP area.

Route 27 extends east/west along Balboa Avenue and Garnet Avenue with 30-minute peak headways and 30-minute off-peak headways and a daily ridership of 1,112. Route 27 serves destinations including Mission Beach, Kearny Mesa Transit Center, and Genesee Plaza (shopping centers, transit centers, employment, etc.). The closest stops are located at Garnet Avenue and De Soto Street and they have a daily ridership of 92. The next closest stops are located at Balboa Avenue and Moraga Avenue and they have a daily ridership of 62.

Route 30 extends along Grand Avenue with 15-minute peak headways and 25-minute off-peak headways and a daily ridership of 9,731. Route 30 serves destinations including the VA Medical Center, UTC Shopping Mall, and the Old Town Transit Center (shopping centers, transit centers, employment, etc.). The closest stops are located at Grand Avenue and Bond Street. The next closest stops are located at Grand Avenue and Mission Bay Drive. The TIS notes that current ridership data were unavailable at these locations. Transit stop locations are shown on Figure 5.15-1.

Rail Transit

The LOSSAN rail corridor is located east of and parallel to I-5 in this area, and bisects the BASASP area in a north-south direction. It does not, however, make any stops in the study area. The Mid-Coast Trolley, which consists of the San Diego MTS Blue Line Trolley line extension from downtown San Diego to the University City community, will also traverse the BASASP area along the east side of

the existing tracks within the LOSSAN rail corridor. This major regional transit route is currently under construction and service is anticipated to begin in 2021. The trolley will stop at the Balboa Avenue Station, a centerpiece of the BASASP.

5.15.1.4 Parking

Aerial images and field verification were used to inventory existing public (i.e., not provided for private uses only) parking lots that could support future users accessing public transit from the Balboa Avenue Station. Locations of on-street and off-street parking were inventoried and are shown in TIS Figure 4-7. The field review found no metered curbside parking spaces within the BASASP boundary. Excluding Mission Bay Drive, which has a two-hour time restriction of on-street parking, all on-street parking spaces are available for free public parking 24 hours a day. Overall, however, it is noted that (although there is street parking), excluding the on-site parking associated with the Balboa Avenue Station, currently there is no existing public parking lot in the southeast quadrant of the Garnet Avenue/Balboa Avenue interchange area with I-5. The closest area within the BASASP is a small lot north of Garnet Avenue, west of I-5.

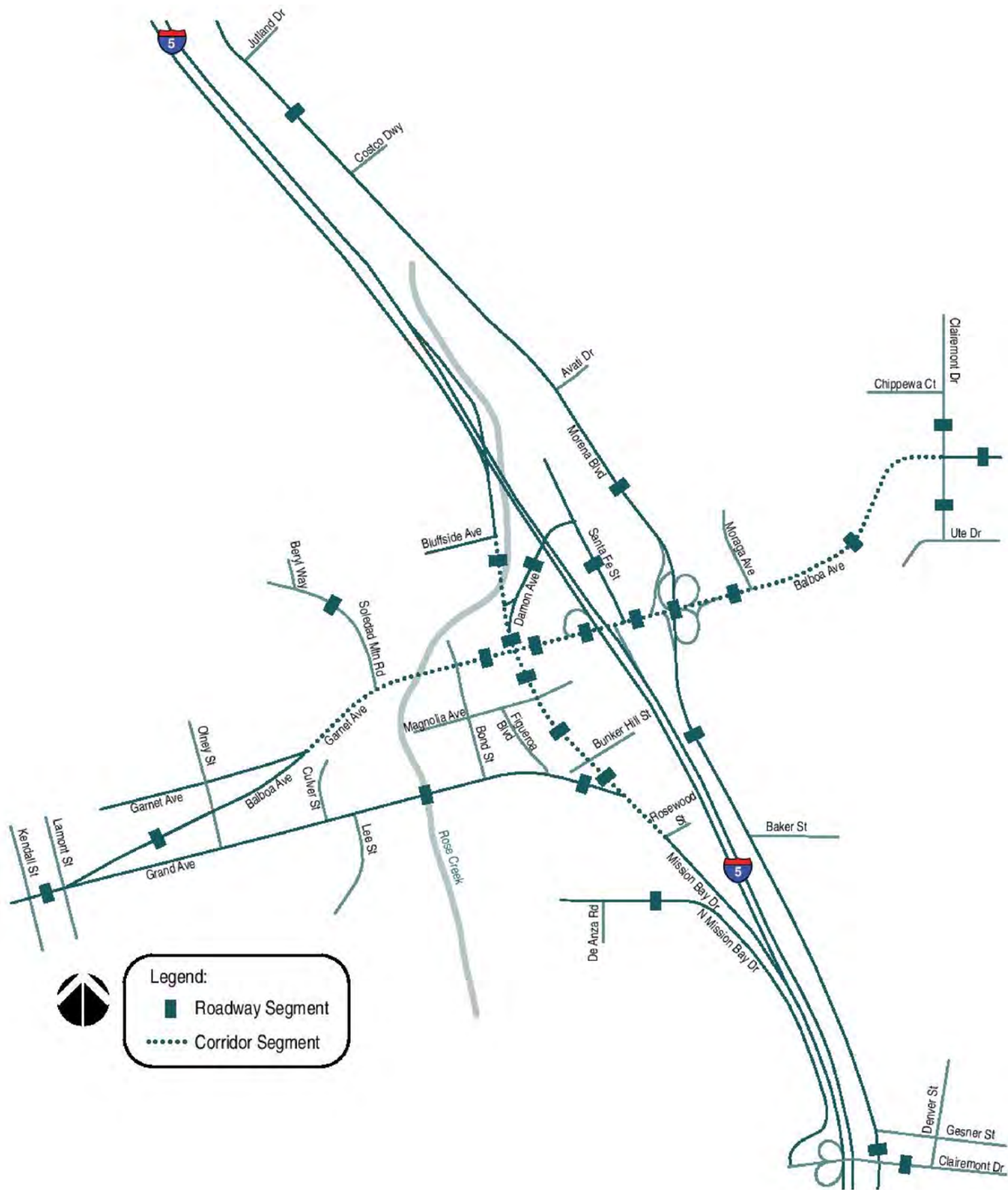
5.15.1.5 Local Vehicular Circulation Network

Selected Roads and Intersections

The TIS summarizes the existing roadway circulation network, daily and peak-hour traffic volumes, and operations at the study area roadway segments, intersections, and freeway facilities.

Roadway Segments

The primary existing roadways in the BASASP area are briefly described on Table 5.15-1, *Existing Roadway Network*. The descriptions of the ultimate roadway classifications are taken from the Clairemont Mesa Community Plan (adopted in 1989) and Pacific Beach Community Plan (adopted in 1995). Segments of Garnet Avenue, Balboa Avenue, Grand Avenue, Mission Bay Drive, Morena Boulevard, Clairemont Drive, Damon Avenue, Santa Fe Street, and Soledad Mountain Road are all addressed. The table identifies and describes the road, specifies its speed and Community Plan classification, and identifies whether or not it is currently built to the ultimate approved design. Segments in which functionality changes (e.g., number of lanes, speed, etc.) within the BASASP area are identified. The location of the 29 roadway segments analyzed in this section are shown in Figure 5.15-3, *Study Area Roadway Segments and Corridors*.



Balboa Avenue Station Area Specific Plan

**Study Area Roadway
Segments and Corridors**

Figure 5.15-3

**Table 5.15-1
EXISTING ROADWAY NETWORK**

Roadway Segment	Existing Configuration	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification?
Garnet Avenue				
Olney Street to Balboa Avenue	<ul style="list-style-type: none"> 2 WB lanes/1 EB lane Continuous two-way left-turn lane On-street parking on both sides Sidewalk, curb, and gutter on both sides 	30	4-Lane Major	No 3-Lane Collector w/two-way left turn lane
Balboa Avenue to Soledad Mountain Road	<ul style="list-style-type: none"> 2 WB lanes/2 EB lanes Raised center median On-street parking on both sides Sidewalk, curb, and gutter on both sides 	35	4-Lane Major	Yes
Soledad Mountain Road to Mission Bay Drive	<ul style="list-style-type: none"> 2 WB lanes/2 EB lanes Raised center median No on-street parking Sidewalk, curb, and gutter on both sides 	35	6-Lane Major	No 4-Lane Major
Mission Bay Drive to I-5 NB Off Ramp	<ul style="list-style-type: none"> 3 WB lanes/2 EB lanes Raised center median No on-street parking Sidewalk, curb, and gutter on both sides 	35	6-Lane Major	No 5-Lane Major
I-5 NB Off Ramp to Morena Boulevard SB On Ramp	<ul style="list-style-type: none"> 3 WB lanes/2 EB lanes (1 Auxiliary lane in EB direction) Raised center median No on-street parking Sidewalk, curb, and gutter on both sides 	35	6-Lane Major	No 5-Lane Major
Balboa Avenue (CA-274)				
Morena Boulevard SB Ramps to Morena Boulevard NB Ramps	<ul style="list-style-type: none"> 2 WB lanes (1 Auxiliary lane in WB direction)/2 EB lanes Raised center median No on-street parking Sidewalk on north side Curb and gutter on both sides 	45	6-Lane Major	No 4-Lane Major
Morena Boulevard NB Ramps to Clairemont Drive	<ul style="list-style-type: none"> 2 WB lanes/2 EB lanes Raised center median No on-street parking Class II (Bike Lane) facility 	45	6-Lane Major	No 4-Lane Major

**Table 5.15-1 (cont.)
EXISTING ROADWAY NETWORK**

Roadway Segment	Existing Configuration	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification?
Mission Bay Drive				
Bluffside Avenue to Rosewood Street	<ul style="list-style-type: none"> • 2 NB lanes/2 SB lanes • Raised center median • On-street parking on both sides • Sidewalk, curb, and gutter on both sides between the bridge over Rose Creek and Rosewood Street 	35	4-Lane Major	Yes
Morena Boulevard				
Jutland Avenue to Avati Drive	<ul style="list-style-type: none"> • 2 NB lanes/2 SB lanes • Continuous two-way left-turn lane • On-street parking on the west side 	45	4-Lane Collector	Yes
Avati Drive to Balboa Avenue	<ul style="list-style-type: none"> • 2 NB lane/2 SB lanes • Continuous two-way left-turn lane • No on-street parking 	45	4-Lane Major	Yes
Balboa Avenue to Baker Street	<ul style="list-style-type: none"> • 1 NB lanes/2 SB lanes • Raised center median • On-street parking on the east side • Sidewalk on the east side • Curb and gutter on both sides 	45	4-Lane Major	Yes
Baker Street to Clairemont Drive	<ul style="list-style-type: none"> • 2 NB lanes/2 SB lanes • Raised center median • On-street parking on the east side • Sidewalk on the east side • Curb and gutter on both sides 	45	4-Lane Major	Yes
Clairemont Drive				
Chippewa Court to Balboa Avenue	<ul style="list-style-type: none"> • 2 NB lanes/2 SB lanes • Raised center median • On-street parking on the west side • Class II (Bike Lane) facility on east side • Class III (Bike Route) facility on west side • Sidewalk, curb, and gutter on both sides 	35	4-Lane Major	Yes

**Table 5.15-1 (cont.)
EXISTING ROADWAY NETWORK**

Roadway Segment	Existing Configuration	Speed Limit (mph)	Community Plan Classification	Built to Ultimate Classification?
Clairemont Drive (cont.)				
Balboa Avenue to Morena Boulevard	<ul style="list-style-type: none"> • 2 NB lanes/2 SB lanes • Continuous two-way left-turn lane • On-street parking on both sides • Sidewalk, curb, and gutter on both sides 	35	4-Lane Major	Yes
Damon Avenue				
Mission Bay Drive to Santa Fe Street	<ul style="list-style-type: none"> • 1 NB lane/1 SB lane • On-street parking on both sides • Class III (Bike Route) facility on both sides • Sidewalk, curb, and gutter on west side 	35	N/A ¹	Yes
Grand Avenue				
Olney Street to Mission Bay Drive	<ul style="list-style-type: none"> • 2 WB lanes/2 EB lanes • Raised center median • No on-street parking • Class II (Bike Lane) facility • Sidewalk, curb, and gutter on both sides 	35	4-Lane Major	Yes
Santa Fe Street				
Damon Avenue to Balboa Avenue	<ul style="list-style-type: none"> • 1 NB lane/1 SB lane 	25	2-Lane Collector (w/o two-way left turn lane)	Yes
Soledad Mountain Road				
Beryl Street to Garnet Avenue	<ul style="list-style-type: none"> • 2 WB lanes/2 EB lanes • Raised center median • No on-street parking • Class II (Bike Lane) facility • Sidewalk, curb, and gutter on both sides 	40	4-Lane Major	Yes

Source: Kimley-Horn 2017

¹This roadway segment is not classified in the Pacific Beach Community Plan

mph = miles per hour, WB= westbound, EB = eastbound, NB = northbound, SB = southbound

Intersections

Twenty-nine intersections were selected for analysis within the BASASP area. The 29 intersections are located along Garnet Avenue (6), Balboa Avenue (4), Grand Avenue (5), Mission Bay Drive (5), Santa Fe Street (1), Morena Boulevard (7), and Balboa Avenue (1). Table 5.15-2, *Study Area Intersections*, lists each of the intersections and provides a reference number for each intersection, which is also shown on Figure 5.15-4, *Study Area Intersections*.

**Table 5.15-2
STUDY AREA INTERSECTIONS**

1	Garnet Avenue at Olney Street	16	Mission Bay Drive at Bluffside Avenue
2	Garnet Avenue at Balboa Avenue	17	Mission Bay Drive at Damon Avenue
3	Garnet Avenue at Soledad Mountain Road	18	Mission Bay Drive at Magnolia Avenue
4	Garnet Avenue at Bond Street	19	Mission Bay Drive at Bunker Hill Street
5	Garnet Avenue at Mission Bay Drive	20	Mission Bay Drive at Rosewood Street
6	Garnet Ave at Santa Fe Street	21	Santa Fe Street at Damon Avenue
7	Balboa Avenue at Morena Boulevard NB Ramps	22	Morena Boulevard at Jutland Drive
8	Balboa Avenue at Moraga Avenue	23	Morena Boulevard at Costco Driveway
9	Balboa Avenue at Clairemont Drive	24	Morena Boulevard at Avati Drive
10	Balboa Avenue at Olney Street	25	Morena Boulevard at WB Balboa Avenue Ramps
11	Grand Avenue at Olney Street	26	Morena Boulevard at EB Balboa Avenue Ramps
12	Grand Avenue at Culver Street	27	Morena Boulevard at Baker Street
13	Grand Avenue at Lee Street	28	Morena Boulevard at Gesner Street
14	Grand Avenue at Figueroa Boulevard	29	Balboa Avenue at Morena Boulevard SB Ramps
15	Grand Avenue at Mission Bay Drive		

Source: Kimley-Horn 2017

EB = eastbound, SB = southbound

Freeway Facilities

Freeway facilities analyzed within the BASASP area include the four consecutive freeway segments of I-5 between State Route 52 and Clairemont Drive, as well as the following three freeway ramp meters:

- I-5 SB/Mission Bay Drive
- I-5 SB/WB Balboa Avenue
- I-5 NB/Mission Bay Drive

Level of Service Criteria

Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment, intersection, or other facility. The concept of LOS is defined as a quantitative measure that represents quality of service for the driver. LOS designations range from A to F, with LOS A representing the best operating conditions from a driver's perspective and LOS F representing the worst.

Roadway Segments

The roadway LOS standards and thresholds the City applies within its jurisdiction provide the basis for analyzing roadway segment performance. Roadway segment LOS shown below is a planning estimate based on the general roadway classification, the maximum theoretical capacity, roadway geometrics, and existing or forecasted average daily traffic (ADT) volumes. The segment traffic volumes indicated as LOS E in Table 5.15-3, *City of San Diego Roadway Segment Capacity and*



Balboa Avenue Station Area Specific Plan

Study Area Intersections

Figure 5.15-4

LOS Summary, are considered to be the capacity of the roadway because at LOS E the v/c ratio is equal to 1.0. This is the theoretical capacity of the roadway; the actual operations of a roadway segment would be affected by the type and frequency of traffic control, driveway density, on street parking, grade, lane width, percent of heavy vehicles and other factors. The acceptable LOS standard for roadways in the City is D or better.

**Table 5.15-3
CITY OF SAN DIEGO ROADWAY SEGMENT CAPACITY AND LOS SUMMARY**

Road Class	Lanes	Cross Section ¹	LEVEL OF SERVICE				
			A ²	B ²	C ²	D ²	E ²
Freeway	8	---	60,000	84,000	120,000	140,000	150,000
Freeway	6	---	45,000	63,000	90,000	110,000	120,000
Freeway	4	---	30,000	42,000	60,000	70,000	80,000
Expressway	6	102/122	30,000	42,000	60,000	70,000	80,000
Prime Arterial	8	---	35,000	50,000	70,000	75,000	80,000
Prime Arterial	7	---	30,000	42,500	60,000	65,000	70,000
Prime Arterial	6	102/122	25,000	35,000	50,000	55,000	60,000
Prime Arterial	5	---	22,500	31,500	45,000	50,000	55,000
Prime Arterial	4	---	20,000	28,000	40,000	45,000	50,000
Major Arterial	8	---	25,000	35,000	50,000	55,000	60,000
Major Arterial	7	---	22,500	31,500	45,000	50,000	55,000
Major Arterial	6	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial	5	---	17,500	24,500	35,000	40,000	45,000
Major Arterial	4	78/98	15,000	21,000	30,000	35,000	40,000
Major Arterial	3	---	11,000	15,500	22,500	26,000	30,000
Collector (w/ two-way left turn lane)	4	72/92	10,000	14,000	20,000	25,000	30,000
Collector (w/ two-way left turn lane)	3	---	7,500	10,500	15,000	18,750	22,500
Collector (w/o two-way left turn lane) (w/ two-way left turn lane)	4 2	64/84 50/70	5,000	7,000	10,000	13,000	15,000
Collector (No fronting property)	2	40/60	4,000	5,500	7,500	9,000	10,000
Collector (w/o two-way left turn lane)	2	40/60	2,500	3,500	5,000	6,500	8,000
Sub-Collector (single-family)	2	36/56	---	---	2,200	---	---

Sources: City Traffic Impact Study Manual, Table 2, Page 8, July 1998. City Planning Department Mobility Staff Input

¹ Cross Section: Curb to Curb width (feet)/Right-of-way width (feet)

² The volumes and the average daily LOS listed above are only intended as a general planning guideline. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Intersections

LOS for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The

average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay.

The LOS for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. The criteria for the various LOS designations for signalized and unsignalized intersections are given in Table 5.15-4, *LOS Criteria for Intersections*. Within City jurisdiction, the acceptable LOS standard for intersections is D or better.

Table 5.15-4
LOS CRITERIA FOR INTERSECTIONS

LOS	Signalized (Control Delay) (sec/veh*) ^a	Unsignalized (Control Delay) (sec/veh) ^b	Description
A	≤10.0	≤10.0	Operations with very low delay and most vehicles do not stop.
B	>10.0 and ≤20.0	>10.0 and ≤15.0	Operations with good progression but with some restricted movement.
C	>20.0 and ≤35.0	>15.0 and ≤25.0	Operations where a significant number of vehicles are stopping with some backup and light congestion.
D	>35.0 and ≤55.0	>25.0 and ≤35.0	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines.
E	>55.0 and ≤80.0	>35.0 and ≤50.0	Operations where there is significant delay, extensive queuing, and poor progression.
F	>80.0	>50.0	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

Source: Kimley-Horn 2017

^a 2000 Highway Capacity Manual, Chapter 18, Page 6, Exhibit 18-4

^b 2000 Highway Capacity Manual, Chapter 19, Page 2, Exhibit 19-1 and Chapter 20, Page 3, Exhibit 20-2

* sec/veh = seconds per vehicle

Freeway Segments

Table 5.15-5, *LOS Criteria for Freeway Segment Analysis*, identifies Caltrans criteria used to rate freeway segment operations based on a LOS scale from A to F.

**Table 5.15-5
LOS CRITERIA FOR FREEWAY SEGMENT ANALYSIS**

LOS	Density Range (pc/mi/ln) ¹	Congestion/Delay	Traffic Description
A	≤ 11	None	Free Flow
B	> 11 – 18	None	Free to stable flow, light to moderate volumes
C	> 18 – 26	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted
D	> 26 – 35	Minimal to substantial	Approaches unstable flow, heavy volumes, and very limited freedom to maneuver
E	> 35 – 45	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor
F	> 45 ²	Considerable 0-1 hour delay	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection

Source: Caltrans Guidelines, 2002 direction to use HCM 2010, Page 10-9

¹ Passenger cars per mile per lane

² or any component v/c ratio > 1.00

Freeway Ramp Metering

Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The fixed rate and uniform 15-minute maximum delay approaches are two approaches that are currently accepted by the City. The fixed rate approach is based solely on the specific time intervals that ramp meters are programmed to release traffic. The uniform 15-minute approach is based on the assumption that any demand exceeding 15-minutes will seek an alternate route or will choose to use the ramp during other time periods when the traffic demand is lower. The fixed rate approach was utilized in this study to analyze freeway ramp meters.

The excess demand at a freeway ramp forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate. This approach assumes a static rate throughout the course of the peak hour; however, Caltrans has indicated that the meter rates operate in a traffic responsive mode and based on the level of traffic using the on-ramp. To the extent possible, the meter rate in the field is set such that the queue length does not exceed the available storage, smooth flows on the freeway mainline are maintained, and there is no interference to arterial traffic.

Existing Traffic Volumes and LOS

Peak period intersection turning movements and roadway segment traffic data were collected by National Data and Surveying Services (NDS) and obtained in May and June of 2016.

Roadway Segments

Existing volumes and LOS on the roadway segments in the BASASP area under Existing Conditions are included in the TIS (Appendix K to this PEIR).

The following roadway segments operate at LOS E or F under Existing Conditions:

- Garnet Avenue between Bond Street and Mission Bay Drive – LOS F
- Two consecutive segments along Garnet Avenue between I-5 SB On-ramp and Morena Boulevard SB Ramps – LOS F
- Two consecutive segments along Balboa Avenue between Morena Boulevard SB Ramps and Moraga Avenue – LOS F
- Balboa Avenue east of Clairemont Drive – LOS E
- Grand Avenue between Kendall Street and Lamont Street – LOS F
- Grand Avenue between Lee Street and Bond Street (On Rose Creek Bridge) – LOS E
- Grand Avenue between Figueroa Boulevard and Mission Bay Drive – LOS E
- Mission Bay Drive between Bluffside Avenue and Damon Avenue – LOS E
- Mission Bay Drive between Damon Avenue and Garnet Avenue – LOS F
- Mission Bay Drive between Grand Avenue and I-5 Ramps – LOS F

Intersections

The TIS includes LOS analysis for the a.m. and p.m. peak periods at each of the 29 study intersections within the BASASP area under existing conditions. The analyses represent the one-hour timeframe that experiences the highest total intersection volume at each individual location. Existing Synchro worksheets are included in Appendix K to this PEIR.

All intersections currently operate at LOS D or better during both peak periods, except for the following:

- Garnet Avenue at Mission Bay Drive (LOS E during the a.m. and p.m. peak periods)
- Garnet Avenue at Santa Fe Street (LOS F during the p.m. peak period)
- Balboa Avenue at Morena Boulevard NB Ramps (LOS F during the p.m. peak period)
- Balboa Avenue at Clairemont Drive (LOS E during the p.m. peak period)
- Mission Bay Drive at Rosewood Street (LOS E during the a.m. peak period and LOS F during the p.m. period)
- Morena Boulevard at Jutland Drive (LOS F during the p.m. peak period)
- Morena Boulevard at Balboa Avenue EB Ramps (LOS F during the a.m. and p.m. peak periods)
- Morena Boulevard at Baker Street (LOS E during the a.m. peak period)

Freeway Segments

Freeway volumes were obtained from Caltrans. The TIS (Appendix K to this PEIR) includes the analysis of freeway segments conducted for the BASASP. None of the freeway segments surrounding the BASASP have volumes that exceed the density during peak hours.

Freeway Ramp Metering

Ramp volumes were obtained from intersection turning movements. The TIS (Appendix K to this PEIR) includes delay and queueing analysis for the ramps in the BASASP. All on-ramp meter locations within the study area are currently operating with a delay less than 15 minutes except the following:

- I-5 SB at Mission Bay Drive ramp during the p.m. peak hour

5.15.2 Regulatory Framework

5.15.2.1 City of San Diego General Plan

Mobility Element

The Mobility Element of the General Plan (City 2008a) addresses the necessary components of a balanced and efficient transportation network, including regional cooperation, congestion management strategies, and transportation choices. In keeping with the City of Villages Strategy, this element of the General Plan contains goals and policies to target growth into mixed-use villages that are pedestrian friendly and linked to the transit system. Tools or strategies such as pedestrian improvements and traffic calming measures are illustrated to help create a vision for smart growth and walkable communities. The General Plan Mobility Element also contains policies to encourage the development and use of alternative transportation modes such as walking, bicycling, and transit.

5.15.2.2 Pacific Beach and Clairemont Mesa Community Plans

Transportation/Circulation Elements

The BASASP is located at the eastern extent of the Pacific Beach Community/LCP Land Use Plan (adopted 1993, amended through 1995) and the western extent of the Clairemont Mesa Community Plan (adopted 1989, amended through 2011). Relevant circulation goals of the adopted Pacific Beach Community Plan Circulation Element include:

- Reduce traffic congestion by increasing the efficiency and utility of public transit, enhancing the aesthetic value of major circulation routes, promoting safe and pleasant bicycle and pedestrian routes, creating a pleasant experience through commercial areas to enhance the commercial district, and providing physical and operational improvements to the circulation system.
- Create safe, pleasant, and useful pedestrian and bicycle pathways to connect the residential neighborhoods of Pacific Beach, such as Crown Point and Braemar, with commercial areas and community facilities, such as schools, parks, and the library. Remove barriers which impede pedestrian, bicycle, and disabled access.

- Increase public transportation routes, perhaps by use of jitneys, minibuses, light rail, or other forms of mass transit to permit safe and inexpensive transit around Pacific Beach.
- Incorporate parking facilities jointly with Mission Bay Park, and reduce the impact of visitor parking in areas closest to the beach and bay through a program of incentives, such as peripheral parking centers and improved transit.
- Where feasible, provide large parking facilities on or near East Mission Bay Drive, particularly as a shared facility with the proposed light rail line stop at Morena Boulevard and Balboa Avenue, coordinated with proposed lots in Old Town and at the intersection of Pacific Highway and Sea World Drive.

Relevant circulation objectives of the Clairemont Mesa Community Plan Transportation Element include:

- Improve the street system as necessary to accommodate the community's growth, while minimizing adverse effects on existing residential, industrial, and commercial uses and the open space system.
- Develop a bicycle system that will join parks and recreational areas, schools, and commercial activity centers in the community and the City.
- Provide an efficient and high level of public transit within and surrounding the community. Design and plan land uses that will support and make use of the future light rail transit.
- Enhance pedestrian circulation, particularly between higher density residential and commercial areas and to active and passive recreational facilities.

5.15.2.3 Balboa Avenue Revitalization Action Program (RAP)

The Balboa Avenue RAP implements a vision for pedestrian-oriented improvements to Balboa Avenue within Clairemont Mesa. The RAP provides recommendations for the Balboa Avenue ROW including landscaping, street design, and walkways and crossings. The project is located within the western-most extent of the RAP; Segment Four (Western Gateway- Clairemont Drive to Interstate 5), and incorporates the Morena ramps west of Moraga Avenue and connection of the sidewalk between Mission Bay Drive and Moraga Avenue.

5.15.2.4 San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (SANDAG 2015) is an update of the Regional Comprehensive Plan for the San Diego Region (RCP) and the 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS), combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system to effectively serve existing and projected workers and residents in the San Diego region.

A key focus is to develop an ambitious and far-reaching transit network that significantly expands the role that transit plays. These improvements include different transit options such as LRT, Bus Rapid Transit (BRT), and High Frequency (Rapid) Local Bus. The Future Year conditions include transit

projects identified in the 2050 RTP that are planned to be implemented by Year 2035. Planned improvements for the BASASP area include:

- **Mid-Coast LRT Extension.** Extension of the Blue Line Trolley from the Old Town Transit Center to the UTC Transit Center. This transit improvement is under construction with an expected year for completion of 2021.
- **COASTER Improvements.** Expansion of the COASTER commuter train to include double tracking and increased trip frequency between Oceanside and downtown San Diego, with 20-minute peak headways. The expected year for completion of this improvement is consistent with the Mid-Coast LRT Extension.

The SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The purpose of the SCS is to help the region meet the GHG emissions reductions set by the California Air Resources Board (CARB). The Regional Plan has a horizon year of 2050, and predicts regional growth and the construction of transportation projects over this time period. The Regional Plan was adopted by the SANDAG Board on October 9, 2015.

5.15.2.5 City of San Diego Bicycle Master Plan

The 2013 update to the 2002 City Bicycle Master Plan presents a renewed vision closely aligned with the City's 2008 General Plan and includes a bicycle network with related bicycle projects, policies, and programs. The proposed bikeway network was developed to complement and connect with the proposed network in the 2002 BMP, the 2006 San Diego Downtown Community Plan, and the 2010 San Diego Regional Bicycle Plan. There are approximately 511 miles of existing bikeway facilities with the majority comprised of Bike Lanes. The recommended bicycle network includes recommendations for an additional 595 miles of bicycle facilities, for a future network totaling almost 1,090 miles.

The types of projects recommended in the Bicycle Master Plan Update include: Bikeways (Class I – Bike Path, Class II – Bike Lane, Class III – Bike Route, Bicycle Boulevards, and Cycle Tracks); Bike Parking such as bike racks and on-street bike corrals; end-of-trip facilities that may be identified as part of individual development project; maintenance activities such as road and sign repair; bicycle signal detection installation, signage and striping for warnings and wayfinding; and multi-modal connection improvements such as providing secure bicycle parking at transit stops.

Bicycle facilities in the BASASP area that are identified in the BMP include the Class I bike path located both north and south of Grand Avenue along Rose Creek at the western extent of the BASASP, the Class II bike lane extending east-west along Grand Avenue, and the Class III bike route trending northeasterly along Damon Avenue from Rose Creek under I-5 to Santa Fe Street, where it turns northerly. A future Class II or III facility is identified linking Mission Bay Drive from Grand Avenue to Damon Avenue and along Santa Fe Street from Damon Avenue to Garnet Avenue. South of Garnet Avenue, that route becomes a proposed Class I bike path as it trends toward Clairemont Drive.

5.15.3 Significance Determination Thresholds

The City has developed threshold standards to determine the significance of project impacts to intersections and roadway segments. The Transportation Research Board produced the Highway Capacity Manual (HCM; Transportation Research Board 2010) that establishes procedures to rate traffic volumes and their effect on transportation facilities, including LOS, to provide a qualitative evaluation based on certain quantitative calculations and as described above. At intersections, the measurement of effectiveness (MOE) is based on allowable increases in delay. Along roadway segments and freeway segments, the MOE is based on allowable increases in the volume to capacity (v/c) ratio. Along corridors, the MOE is based on allowable decreases in speed.

At intersections that are expected to operate at LOS E or F without the project, the allowable increase in delay is two seconds at LOS E and one second at LOS F with the addition of the project. If the addition of project traffic would cause the delay to exceed these thresholds, a significant impact would occur. Also, if the project causes an intersection that was operating at an acceptable LOS (LOS A to D) to operate at LOS E or F, this change would be considered a significant impact.

For roadway segments that are forecasted to operate at LOS E or F without the project, the allowable increase in v/c ratio with the project is 0.02 at LOS E and 0.01 at LOS F. If vehicle trips from a project cause the v/c ratio to increase by more than this ratio, a significant impact would occur. Also, if the project causes a street segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

Where the roadway segment operates at LOS E or F, if the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the project; and a peak period HCM arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the project; then the project impacts are determined to be less than significant and no mitigation is required. If analysis shows either the intersections or segment under the peak period HCM analysis do not operate acceptably, the project impacts are considered significant and unmitigated, requiring the adoption of findings of infeasibility and a statement of overriding considerations before the project may be approved.

In certain instances, mitigation may not be required even if a roadway segment operates at LOS E or LOS F. In such cases the following three conditions must all be met:

1. The roadway is built to its ultimate classification per the community plan;
2. The intersections on both ends of the failing segment operate at an acceptable LOS; and
3. An HCM arterial analysis indicates an acceptable LOS on the segment.

For corridor travel times, the allowable decrease in speed is 0.5 miles per hour (mph) at LOS E and 1 mph at LOS F. If vehicle trips from a project cause the speed to decrease by more than the allowable threshold, this would be considered a significant project traffic impact that requires mitigation.

For freeway segments that are forecasted to operate at LOS E or F with the project, the allowable decrease in speeds is 1.0 mph at LOS E and 0.5 mph at LOS F. If vehicle trips from a project cause

the speed to decrease by more than the allowable threshold, this would be considered a significant project traffic impact that requires mitigation. Also, if the project causes a freeway segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact that requires mitigation.

If vehicle trips from a project cause a metered ramp with a delay of 15 minutes per vehicle or higher to increase its delay by more than 2 minutes per vehicle, this would be considered a significant project traffic impact that requires mitigation if the freeway segment operates at LOS E or F.

Table 5.15-6, *Significance Criteria for Facilities in the Specific Plan Area*, shows the criteria for determining levels of significance for the different facilities in the BASASP area.

**Table 5.15-6
SIGNIFICANCE CRITERIA FOR FACILITIES IN SPECIFIC PLAN AREA**

Facility	Measures of Effectiveness (MOE)	Significance Threshold ^a
Intersection	Seconds of Delay	>2.0 seconds at LOS E or >1.0 second at LOS F
Roadway Segment	ADT, v/c Ratio	>0.02 at LOS E or >0.01 at LOS F
Freeway Segment	Speed	>1.0 mph at LOS E, or >0.5 mph at LOS F
Freeway Ramp Meter	Minutes of delay per vehicle	>2.0 minutes for freeway segments operating at LOS E, or >1.0 minutes for freeway segments operating at LOS F. The criteria only apply for ramp meters where the delay without project is 15 minutes or higher.

Source: Kimley-Horn 2017, City 2016

^a Significance threshold applies only when the type of facility operates at LOS E or F.

If a project adds any increment of delay to cause the operations of an intersection to go from LOS A through D to either LOS E or LOS F, then the project is considered to cause a significant impact.

Based on the City's Significance Determination Thresholds (City 2016a), a significant traffic circulation impact would occur if implementation of the proposed BASASP would:

1. Decrease the percent of alternative mode trips in the City's transportation system;
2. Conflict with adopted policies, plans, or programs supporting alternative transportation models or have a substantial impact upon planned alternative transportation systems;
3. Cause any roadway corridor (segment or intersection) to exceed a threshold identified in Table 5.15-6; or
4. Increase demand for parking or adversely affect existing parking.

5.15.4 Issue 1: Alternative Transportation Modes

Would the proposed BASASP decrease the percent of alternative mode trips in the City's transportation system?

5.15.4.1 Impacts

Pedestrian Analysis

Planned/Recommended Improvements

The Balboa Avenue Station includes new pedestrian facilities adjacent to the station to connect with the existing road network. These include a pedestrian facility adjacent to the rail bridge crossing Balboa Avenue, pedestrian ramps from the bridge to the street on both sides of Balboa Avenue, and new sidewalks and curb ramps along Balboa Avenue and Morena Boulevard within the vicinity of the station. Recommendations and policies within the BASASP area were made based on the existing network with station improvements assumed complete. Figure 5.15-5, *Future Planned Pedestrian Network and Station Walkshed*, depicts the planned pedestrian network. Figure 5.15-6, *PEQE Analysis Results for Future Condition with BASASP*, shows the results of the PEQE analysis (described in Section 5.15.1.1) within the half-mile walkshed with the recommended network in place. With planned improvements, the BASASP would be expected to increase the pedestrian mode trips in the City of San Diego.

Bicycle Analysis

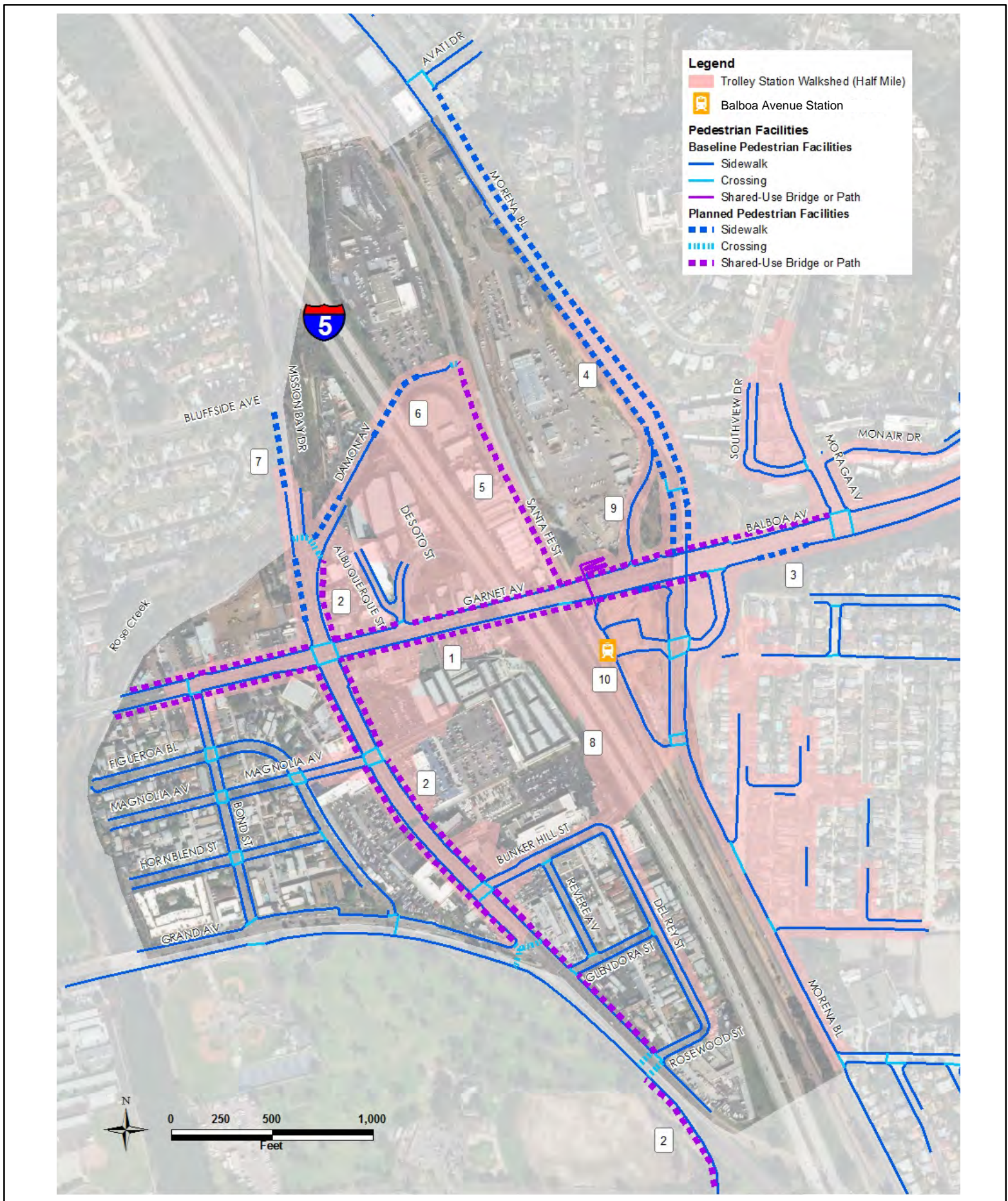
Planned/Recommended Improvements

The proposed BASASP and associated discretionary actions would support existing plans and policies relative to the bicycle network. Figure 5.15-7, *Future Planned Bicycle Facilities*, presents the recommended bicycle facilities within the BASASP area. Figure 5.15-8, *BLTS Analysis Results for Future Condition with BASASP*, summarizes the BLTS score for each direction of roadway segments throughout the area with the recommended improvements in place. The Mobility Element includes several bicycle-focused policies that support installation of bicycle parking facilities, identification of bicycle priority streets to connect neighboring communities, and increasing the level of bicycle comfort and safety for all levels of bicycle riders. Policies in the proposed plan support coordination with SANDAG on the planning and implementation of regional bicycle facilities; and support increased bicycle comfort and safety, repurposing rights-of-way for bicycle facilities, and bike sharing. Thus, implementation of the proposed BASASP and associated discretionary actions would not be expected to reduce bicycle mode trips in The City of San Diego's transportation system.

Transit Analysis

As described in Section 5.15.1.3, two bus routes currently operate in the project area: Route 27 along Balboa and Garnet Avenues, and Route 30 along Grand Avenue. Bus travel time affects transit service efficiency.

Implementation of the BASASP would support future transit improvements through policies and recommendations. In addition, recommended improvements in the BASASP would improve transit



Balboa Avenue Station Area Specific Plan

Future Planned Pedestrian Network
and Station Walkshed

Figure 5.15-5



Balboa Avenue Station Area Specific Plan

**PEQE Analysis Results for
Future Condition with BASASP**

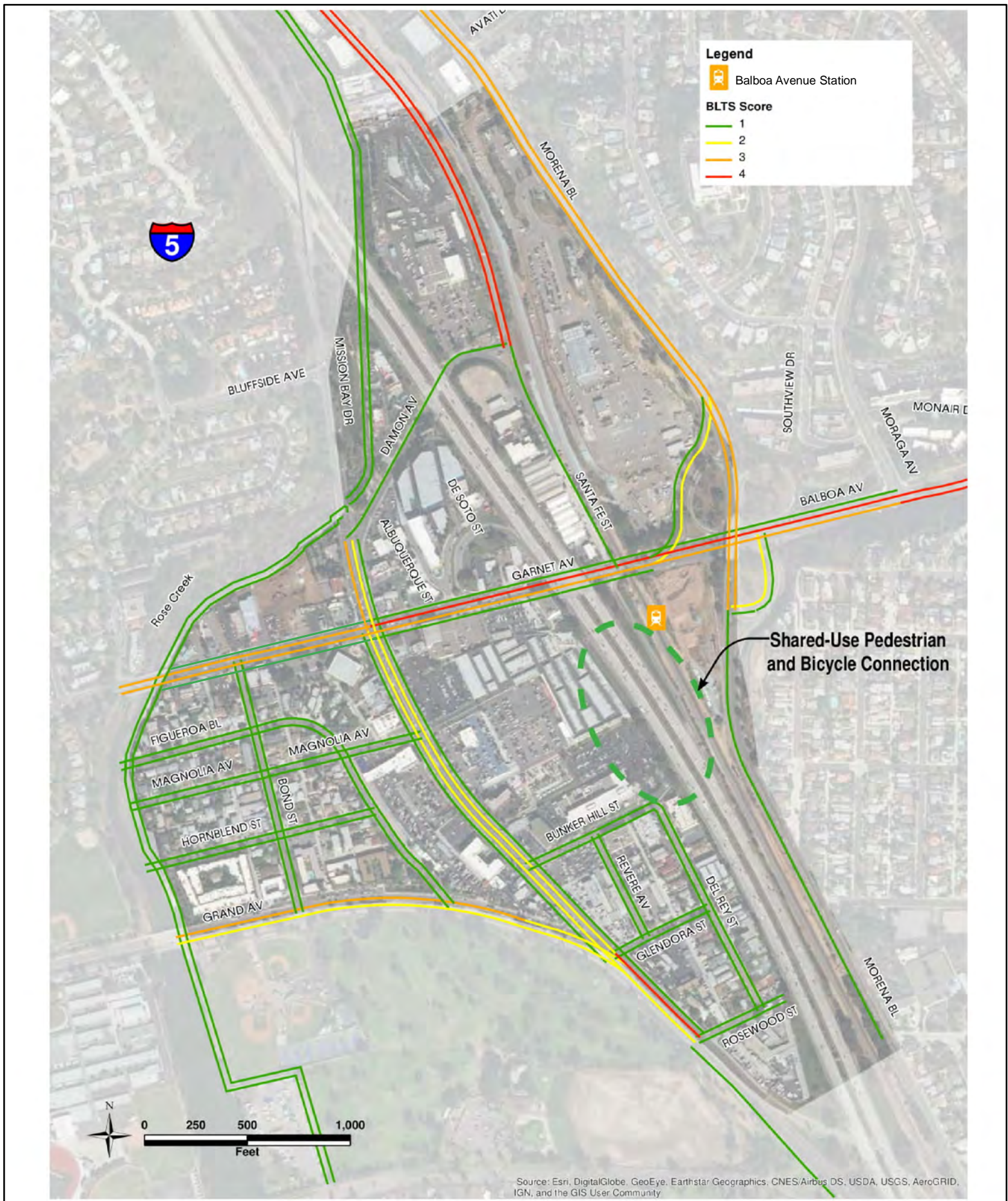
Figure 5.15-6



Balboa Avenue Station Area Specific Plan

Future Planned Bicycle Facilities

Figure 5.15-7



Balboa Avenue Station Area Specific Plan

**BLTS Analysis Results for
Future Condition with BASASP**

Figure 5.15-8

efficiency. Thus, impacts related to conflicts with existing or planned transit facilities would be less than significant.

5.15.4.2 Significance of Impacts

All recommended BASASP pedestrian, bicycle, and transit-related improvements would improve alternative transportation connectivity and accessibility. Facilities planned as part of the BASASP would increase, rather than decrease, the percent of alternative mode trips in the City's transportation system. Project effects on pedestrian facilities, bicycle facilities, and rail and bus facilities, therefore, would be beneficial rather than adverse, and would result in no or less than significant impacts.

5.15.4.3 Mitigation Framework

Impacts to alternative transportation mode trips under the BASASP would be less than significant. To the contrary, the project is expected to increase such trips. No mitigation measures are required.

5.15.4.4 Significance After Mitigation

Impacts to alternative transportation mode trips under the BASASP would be less than significant.

5.15.5 Issue 2: Conflict with Plans or Policies Supporting Alternative Transportation Modes or Substantially Impact Alternative Transportation Systems

Would the proposed BASASP conflict with adopted policies, plans, or programs supporting alternative transportation models or have a substantial impact upon planned alternative transportation systems?

5.15.5.1 Impacts

This Transportation/Circulation review of plans and policies specifically addresses the proposed project effect on Transportation Element policies in the project area community plans. It is focused on the physical effects that the project proposes, and not on consistency of BASASP goals. Please also refer to Section 5.1, *Land Use*, of this PEIR for more general discussion related to overall policy consistency.

The upgrades to facilities from existing to BASASP planned facilities are described in Section 5.15.4.1. Ultimate implementation of the BASASP as described in this PEIR would not impede the ability of the City to implement plans and policies supporting alternative transportation modes, bikeway improvements or light rail improvements—rather, the project would implement includes a number of the recommended bike and pedestrian-oriented improvements. These would improve connectivity to an approved trolley/transit stop that would support alternative transportation goals overall. In addition, it would directly fulfill plans in the Pacific Beach Community Plan/LCP Land Use Plan, as well as the Clairemont Mesa Community Plan. As stated in Section 5.15.2, both plans have goals to improve or create pedestrian and bicycle pathways in their respective communities and support public transit.

Consistent with the Pacific Beach Community Plan Transportation Element, the project development of denser residential, commercial, and light industrial uses adjacent to the Balboa Avenue Station would be expected to increase the efficiency and utility of public transit. Improvements to the pedestrian and bicycle facilities, combined with design guidelines related to streetscapes, building massing, and parking areas would promote operationally enhanced, safe, and pleasant bicycle and pedestrian routes, including through commercial districts.

Consistent with the Clairemont Mesa Community Plan Transportation Element, BASASP implementation would contribute to a bicycle system joining parks and recreational areas, schools, and commercial activity centers in the community and the City; support provision of an efficient and high level of public transit system within and surrounding the community, and would specifically allow for the denser land uses to support, and make use of, the future light rail transit; and would enhance pedestrian circulation, particularly between higher density residential and commercial areas and to recreational facilities such as the Rose Creek Trail and Mission Bay area.

As stated in the BASASP, the Specific Plan complements and builds upon the recommendations of the Balboa Avenue RAP, extending pedestrian amenities beyond the north end of the Balboa Avenue Station that are already proposed as part of the transit station upgrades.

5.15.5.2 Significance of Impacts

All recommended transit improvements would create new/enhanced alternative transportation opportunities within the BASASP. All recommendations also would improve alternative transportation connectivity and accessibility. These can be considered “substantial” effects to the system, but are beneficial rather than adverse, and would actually implement the policies, plans, or programs supporting alternative transportation modes rather than conflicting with them. Project implementation would not substantially adversely impact planned alternative transportation mode systems and would not result in adverse impacts to policies, plans, or programs supporting alternative transportation modes.

5.15.5.3 Mitigation Framework

Impacts to adopted policies, plans, or programs supporting alternative transportation modes and to planned alternative transportation systems under the BASASP would be less than significant. To the contrary, the project supports and in part implements these goals. No mitigation measures are required.

5.15.5.4 Significance After Mitigation

Impacts to adopted policies, plans, or programs and to planned alternative transportation systems supporting alternative transportation modes under the BASASP would be less than significant.

5.15.6 Issue 3: Vehicular Traffic Circulation

Would traffic associated with the proposed BASASP cause any roadway corridor (segments, intersections or freeway facilities) to exceed the City's significance thresholds?

5.15.6.1 Impacts

Future year traffic volumes were derived from the SANDAG year 2035 modeling and calibrated for the BASASP area. The projections include the change in land use assumptions associated with the BASASP and recommended transportation network to connect people to the new Balboa Avenue Station via all modes of travel. Analysis of future condition includes the following four improvements ~~areas that are incorporated as project features during~~ included within the BASASP implementation:

- **Mission Bay Drive at Damon Avenue** would be reconfigured to eliminate the northbound free right-turn movement, and provide a larger refuge area in the northeast corner. Planned improvement concepts for this intersection are shown on Figure 5.15-9, *Proposed Intersection Configuration at Mission Bay Drive and Damon Avenue*.
- **Mission Bay Drive at Garnet Avenue** would have pedestrian crossings upgraded to have a more visible appearance by use of continental striping or textured pavement. Class II bicycle facilities would be included on Mission Bay Drive between Damon Avenue and Rosewood Street and on Garnet Avenue between Soledad Mountain Road and Mission Bay Drive, providing connections to the existing Rose Creek Trail. Planned improvement concepts for this intersection are shown on Figure 5.15-10, *Proposed Intersection Configuration at Mission Bay Drive and Garnet Avenue*.
- **Balboa Avenue/Garnet Avenue East of I-5** would be reconfigured to provide shared-use pedestrian and bicycle paths, dedicated bus areas in the eastbound direction along a portion of this, and removal of free right turns. The westbound shared-use path would connect to Moraga Avenue east of the Balboa Avenue Station. This includes reconfiguration of the Morena Boulevard ramps to remove the westbound free right movements at Balboa Avenue/Garnet Avenue and remove the northbound Morena Boulevard to westbound Balboa Avenue loop ramp. Planned improvement concepts for this area are shown on Figure 5.15-11, *Proposed Configurations at Balboa Avenue/Garnet Avenue East of I-5*.
- **Mission Bay Drive at Grand Avenue** would be changed to realign the lanes in a way such that Grand Avenue becomes the through movement rather than Mission Bay Drive. Pedestrian crossings would be included in the reconfigured intersection design. Planned improvement concepts for this intersection are shown on Figure 5.15-12, *Proposed Intersection Configuration at Mission Bay Drive and Grand Avenue*. This would also modify the intersection of Grand Avenue at Figueroa Drive to have two eastbound travel lanes instead of one.
- **Mission Bay Drive between Rosewood Street and Damon Avenue** would be reconfigured to include shared-use paths. North- and southbound bike lanes also would be provided between Grand Avenue and Garnet Avenue by removing the existing parking lane along both sides of Mission Bay Drive. Planned improvement concepts are shown on

Figure 5.15-13, *Proposed Configuration of Mission Bay Drive between Damon Avenue and Rosewood Street.*

The TIS assumed future year buildout of the BASASP to include 4,729 dwelling units (with an associated 28,380 trips), and 1,037,757 square feet of non-residential uses (with an associated 27,245 trips); for a total of 55,625 daily trips. In comparison to the ~~current-adopted~~ community plans, buildout of the proposed BASASP assumes approximately 3,500 additional dwelling units (resulting in approximately 24,500 additional trips). ~~and Buildout of the BASASP would result in nearly a 4,000-dwelling unit increase from the existing number of dwelling units in the plan area (resulting in approximately 34,000 additional trips).~~

A traffic model was prepared by SANDAG for existing and future community buildout conditions. Traffic counts from the data collection efforts for this project and historical counts from the City were used to calibrate the existing model results. Using the attributes included in the calibrated existing model, the future land use and network assumptions for the project were input into the model to estimate future volumes. Based on the existing calibration exercise and the future volume projections, several post-model adjustments were made. Details of the adjustments are provided in Appendix C of the Traffic Impact Study (Appendix K to this PEIR). Adjustments were typically required when the model-to-volume discrepancy was greater than 10 percent.

Roadway Segments

Future roadway segment capacity analysis and volumes are included in the TIS (Appendix K to this PEIR). Implementation of the BASASP would result in significant cumulative segment impacts on the following roadway segments:

- Impact 5.15-1: The proposed BASASP would have a traffic impact to three consecutive roadway segments of Garnet Avenue from Mission Bay Drive to Morena Boulevard SB Ramps.
- Impact 5.15-2: The proposed BASASP would have a traffic impact to Balboa Avenue east of Clairemont Drive.
- Impact 5.15-3: The proposed BASASP would have a traffic impact to six consecutive roadway segments of Mission Bay Drive from Bluffside Avenue to I-5 ramps.
- Impact 5.15-4: The proposed BASASP would have a traffic impact to Clairemont Drive from Denver Street to Morena Boulevard.

Intersections

Study area intersection geometrics that would change with the Project are shown in Figures 5.15-14a and 5.15-14b, *Proposed Modified Intersection Geometrics.*

Future intersection analysis is included in the TIS (Appendix K to this PEIR). Implementation of the BASASP would result in significant cumulative impacts on the following intersections:

- Impact 5.15-5: The proposed BASASP would have a traffic impact to the intersection of Garnet Avenue and Olney Street in the PM peak period.



Balboa Avenue Station Area Specific Plan

**Proposed Intersection Configuration at
Mission Bay Drive and Damon Avenue**

Figure 5.15-9



Balboa Avenue Station Area Specific Plan

**Proposed Intersection Configuration at
Mission Bay Drive and Garnet Avenue**

Figure 5.15-10



Balboa Avenue Station Area Specific Plan

**Proposed Configurations at Balboa
Avenue/Garnet Avenue East of I-5**

Figure 5.15-11



Balboa Avenue Station Area Specific Plan

**Proposed Intersection Configuration at
Mission Bay Drive and Grand Avenue**

Figure 5.15-12



Match Line - See Below Left

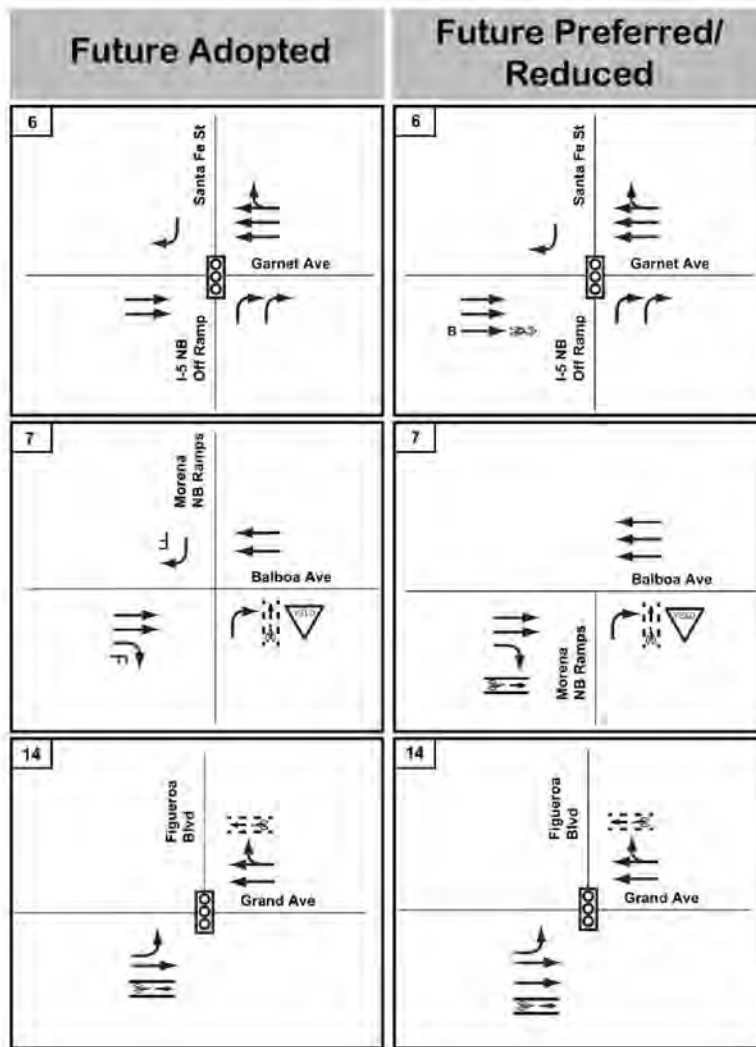


Match Line - See Upper Right

Balboa Avenue Station Area Specific Plan




Proposed Configuration of Mission Bay Drive
between Damon Avenue and Rosewood Street

Figure 5.15-13






LEGEND

Intersection Control


-  Signalized Intersection
-  Stop Controlled Approach
-  Yield Controlled Movement

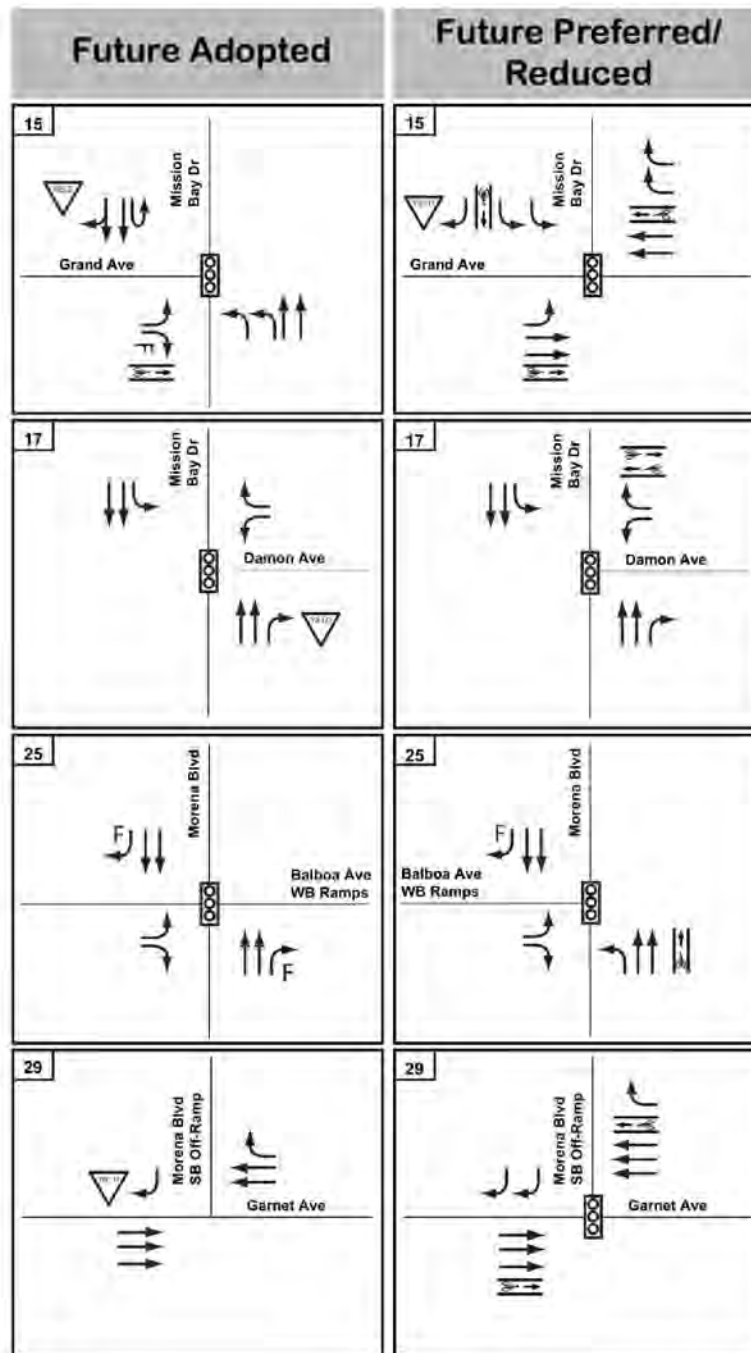
- F Free Right-Turn
- O Right-Turn Overlap

Bicycle Facilities

-  Through Bicycle Lane ('Bicycle Pocket')
-  Striped Bicycle Lane Merge
-  Cycle Track

Transit Facilities

-  Bus Only Movement



LEGEND	<i>Intersection Control</i>		<i>Bicycle Facilities</i>	
		Signalized Intersection		Through Bicycle Lane ('Bicycle Pocket')
		Stop Controlled Approach		Striped Bicycle Lane Merge
		Yield Controlled Movement		Cycle Track
		F Free Right-Turn	<i>Transit Facilities</i>	
		O Right-Turn Overlap	Bus Only Movement	

- Impact 5.15-6: The proposed BASASP would have a traffic impact to the intersection of Garnet Avenue and Mission Bay Drive in the PM peak period.
- Impact 5.15-7: The proposed BASASP would have a traffic impact to the intersection of Balboa Avenue and Morena Boulevard NB Ramps in the PM peak period.
- Impact 5.15-8: The proposed BASASP would have a traffic impact to the intersection of Clairemont Drive and Balboa Avenue in the PM peak period.
- Impact 5.15-9: The proposed BASASP would have a traffic impact to the intersection of Morena Boulevard and Jutland Drive in the PM peak period.

TIS Appendix H, in Appendix K of this PEIR, contains the peak period intersections LOS calculation worksheets.

Freeway Segments

Future freeway segment analysis is included in the TIS (Appendix K to this PEIR). Implementation of the BASASP would result in significant cumulative impacts on all of the study freeway segments:

- Impact 5.15-10: Four consecutive segments of I-5 from SR-52 to Clairemont Drive

Freeway Ramp Metering

Future freeway ramp meter analysis is included in the TIS (Appendix K to this PEIR). The traffic generated by the land use changes associated with the BASASP would result in significant cumulative impacts on the following freeway ramp meters within the study area:

- Impact 5.15-11: I-5 SB and Mission Bay Drive

- Impact 5.15-12: I-5 NB and Mission Bay Drive

5.15.6.2 Mitigation Framework

At the program level, impact reduction occurs through identification of necessary roadway, intersection, and freeway improvements. Mitigation or construction of these improvements would be carried out at the project level.

Roadway Segments

The TIS identified and evaluated a number of roadway segment improvements that could mitigate or reduce the roadway segment impacts identified above. While the following roadway segment mitigation measures would reduce potentially significant impacts, none are proposed as part of the BASASP and associated discretionary actions for reasons described in Section 5.15.6.3.

TRANS 5.15-1: Garnet Avenue (Impact 5.15-1)

- a. Mission Bay Drive to I-5 southbound on-ramp: Widen the roadway segment to a 6-lane Major Arterial.

- b. I-5 southbound on-ramp to I-5 northbound off-ramp: Widen the roadway segment to an 8-lane Major Arterial.
- c. I-5 northbound off-ramp to Morena Boulevard southbound ramps: Widen the roadway segment to an 8-lane Major Arterial.

TRANS 5.15-2: Balboa Avenue east of Clairemont Drive (Impact 5.15-2): Widen the roadway segment to a 6-lane Major Arterial.

TRANS 5.15-3: Mission Bay Drive (Impact 5.15-3)

- a. Bluffside Avenue to Damon Avenue: Widen the roadway segment to a 65-lane Major Arterial.
- b. Damon Avenue to Garnet Avenue: Widen the roadway segment to a 6-lane Major Arterial.
- c. Garnet Avenue to Magnolia Avenue: Widen the roadway segment to a 65-lane Major Arterial.
- d. Magnolia Avenue to Bunker Hill Street: Widen the roadway segment to a 65-lane Major Arterial.
- e. Bunker Hill Street to Grand Avenue: Widen the roadway segment to a 65-lane Major Arterial.
- f. Grand Avenue to I-5 Ramps: Widen the roadway segment to an 8-lane Major Arterial.

TRANS 5.15-4: Clairemont Drive from Denver Street to Morena Boulevard (Impact 5.15-4): Widen the roadway segment to a 6-lane Major Arterial.

Intersections

The TIS identified and evaluated intersection improvements that could mitigate the intersection impacts identified above. While the following intersection mitigation measures would reduce potentially significant impacts, only TRANS 5.15-5, TRANS 5.15-6, TRANS 5.15-7 and TRANS 5.15-9 are proposed as part of the BASASP and associated discretionary actions.

TRANS 5.15-5: Garnet Avenue at Olney Street (Impact 5.15-5): Remove parking and restripe Olney Street to include northbound left-turn lane. This improvement is recommended as part of the BASASP.

TRANS 5.15-6: Garnet Avenue at Mission Bay Drive (Impact 5.15-6): Widen Garnet Avenue between ~~Soledad Mountain Road~~ Bond Street and Mission Bay Drive to include three eastbound through lanes (with the outside eastbound through lane becoming a right-turn lane at Mission Bay Drive) and construct a second westbound left turn lane. This improvement is recommended as part of the BASASP.

TRANS 5.15-7: Balboa Avenue at Morena Boulevard NB Ramps (Impact 5.15-7): Install a partial traffic signal to control the eastbound and northbound approaches. This improvement is recommended as part of the BASASP.

TRANS 5.15-8: Balboa Avenue at Clairemont Drive (Impact 5.15-8): Construct a southbound right-turn lane, second southbound left-turn lane, and a westbound right-turn lane.

TRANS 5.15-9: Morena Boulevard at Jutland Drive (Impact 5.15-9): Install a traffic signal or roundabout. This improvement is recommended as part of the BASASP.

As noted, all but one of the intersection improvements evaluated in the TIS ultimately were recommended for inclusion in the BASASP and associated discretionary actions.

Freeway Segments

No mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City. The improvements identified in SANDAG's RTP would improve operations along the freeway segments and ramps; however, to what extent is still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. The City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level developments proceed, to develop potential "fair share" multi-modal mitigation strategies for freeway impacts, as appropriate. The following are the freeway mainline improvements identified in SANDAG's RTP:

TRANS 5.15-10: I-5 NB and SB from SR-52 to Clairemont Drive (Impact 5.15-10): SANDAG San Diego Forward 2050 Revenue Constrained Network includes operational improvements and construction of managed lanes along I-5 between SR-52 and Clairemont Drive. This project is expected to be constructed by the year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

Ramp Meter Analysis

TRANS 5.15-11: The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Improvements could include additional lanes, interchange reconfigurations, Transportation Demand Measures (TDM); however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. Additionally, the ~~Preferred Plan~~ BASASP includes a variety of transit, pedestrian and bicycle facilities that may help to reduce single-occupancy

vehicle (SOV) travel which can help improve ramp capacity. (Impact 5.15-11 and 5.15-12).

5.15.6.3 Significance After Mitigation

Roadway Segments

As described above, traffic mitigation measures were identified for each roadway segment with significant impacts that would result in operations better than existing conditions. Based on the feasibility of the traffic mitigation measures, no segment improvements are recommended as part of the BASASP. Therefore, impacts to the 11 identified roadway segments along Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive would remain significant and unavoidable upon implementation of the BASASP based on the following as described below:

- Implementation of the improvements are contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; or
- Sufficient ROW does not exist to construct the improvements.

One of the primary principles of smart growth is to encourage the use of alternative forms of transportation by discouraging reliance on the private automobile. As the improvements identified above would reduce traffic congestion and encourage automobile use, these mitigation measures can generally be considered inconsistent with the overall goals of the City's General Plan and BASASP. Additionally, roadway and intersection widening could impact existing or proposed pedestrian (such as at Clairemont Drive and Balboa Avenue intersection) or bicycle facilities, which could discourage walking and bicycling. As such, mitigation measures evaluated for Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive segments are considered infeasible due to policy considerations.

Due to the degree of development adjacent to some of the improvements, their construction is considered infeasible due to the impact on the adjacent development. This is based both on the high cost of acquiring additional ROW as well as potential additional structure removal, which could result in additional air quality, noise, GHGs, and solid waste environmental effects, as well as increased pedestrian diversion at the intersection of Balboa Avenue and Clairemont Drive.

Intersections

Traffic mitigation measures were identified for each intersection with significant impacts that would result in operations better than existing conditions. All but one of these is recommended for inclusion as part of the BASASP. Thus, intersection impacts to Garnet Avenue at Olney Street (Impact 5.15-5), Garnet Avenue at Mission Bay Drive (Impact 5.15-6), Balboa Avenue at Morena Boulevard NB Ramps (Impact 5.15-7), and Morena Boulevard at Jutland Drive (Impact 5.15-9) would be reduced to less than significant levels with implementation of the BASASP. Impacts to the intersection of Balboa Avenue at Clairemont Drive (Impact 5.15-8), however, would remain significant and unavoidable upon implementation of the BASASP for the reasons discussed above under Roadway Segments. This intersection will be further studied as a part of the ongoing comprehensive Clairemont Community Plan Update effort and future mobility improvements to this intersection could be proposed as part of that effort.

Freeway Facilities

Likewise, impacts to Caltrans facilities (Impacts 5.15-10 through 5.15-12) would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur prior to the assumed buildout of 2035.

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5.16 Visual Effects and Neighborhood Character

This section describes scenic resources and urban features as they relate to neighborhood character and visual resources, and analyzes the potential impacts to community visual character resulting from implementation of the proposed BASASP. The analysis evaluates visual aspects of the proposed BASASP, including height, bulk, scale, and architectural and landscape design, for compatibility with existing and planned patterns of development and associated neighborhood character in the surrounding area.

5.16.1 Existing Conditions

5.16.1.1 Visual Setting

Topographically, the BASASP area has varying elevations from a low of approximately 10 feet AMSL in the west to a high of approximately 145 feet AMSL in the east. Because of its developed condition, virtually all of project area has been graded at some point in time and no naturally occurring slopes or landforms exist. The majority of the BASASP area located west of I-5 is relatively level, with the eastern portion of the BASASP area north of Balboa Avenue ascending toward the community of Clairemont Mesa to the east. Although generally flat throughout the BASASP area south of Balboa Avenue, terrain surrounding the BASASP rises steeply to the east immediately east of the BASASP boundary south of Balboa Avenue. West of I-5, low-lying coastal areas and Mission Bay comprise a large portion of terrain south of Grand Avenue. Immediately offsite north of the I-5/Garnet Avenue off-ramp, terrain associated with an east-facing bluff west of I-5 rises steeply to contribute to the visual setting.

North of Balboa Avenue, commercial and industrial/public works uses comprise the bulk of the developed uses between I-5 and Morena Boulevard, including the SDG&E Beach and Cities operations yard, City Rose Canyon Operations Yard, and numerous small businesses (gas stations, design centers, car repair, storage facilities, etc.), as described in Section 5.1, *Land Use*. The commercial/industrial uses within the BASASP area feature large swaths of parking lot (with substantial safety lighting), street-facing landscaping of different styles, and a variety of structure styles, including block-shaped warehouses and small individually designed commercial structures. Both single- and multi-story structures occur in this area. Limited streetscape landscaping occurs in this area and the storage yards that surround the industrial buildings contain an eclectic mix of materials, equipment, vehicles, and other public works items. There is no dominant building style or architectural theme in this portion of the BASASP area and overall, the area generally exhibits low visual quality.

Commercial development is the predominant land use in the BASASP area, as described in Section 5.1, *Land Use* and illustrated in Figure 5.1-1. Substantial commercial development is also located west of I-5 along Mission Bay Drive, as well as on both sides of Garnet Avenue/Balboa Avenue. North of Garnet Avenue/Balboa Avenue, commercial uses include smog and bumper repair, self-storage, fast-food restaurants, bar uses, and gas station uses, etc. Some of these commercial uses are three stories in height, while several two-story apartments are also interspersed with the commercial development. South of Garnet Avenue/Balboa Avenue, and generally along and east of Figueroa Street, the commercial uses include car dealerships, car repair, gas stations, motels, restaurants, bank, etc. The various commercial uses that line Garnet Avenue west of

Mission Bay Drive include restaurants, motorcycle/car repair facilities, and other retail establishments. There is no consistent architectural theme or consistency with regard to bulk and scale in these commercial areas.

Residential development within the BASASP area is primarily situated between Grand Avenue and the east-west portion of Figueroa Avenue, east of Rose Creek and an area between Del Rey Street and Mission Bay Drive north of Rosewood Street (see Figure 5.1-1). East of Rose Creek and west of Figueroa Avenue, one- to two-story single-family residential uses are along Magnolia, Figueroa, and Hornblend Streets. Two-story apartment buildings are interspersed with single-family residences and become more prevalent closer to Grand Avenue. Several three-story multi-family structures are interspersed in this area, primarily located to the south along Grand Avenue. East of Mission Bay Drive, both single and multi-story residential structures are interspersed with multi-level commercial and office structures. Similar to other portions of the BASASP area, there is no consistent architectural theme, bulk, or scale in these residential areas.

Within the BASASP, open space is limited to the Rose Creek drainage, characterized by open water, riparian vegetation, and edging trees and shrubs associated with residential uses backing up to the Class I bike path that parallels the creek. Immediately south of the BASASP area are recreation facilities associated with Mission Bay Golf Course and nearby playing fields.

Currently, the Balboa Avenue Station/associated rail improvements provide areas of visual disturbance/construction within the only undeveloped area within the BASASP east of I-5 and south of Balboa Avenue (refer to Figure 2-2). There is also construction-related disturbance west of I-5 south of Rosewood Street where a multi-family housing development is being constructed.

5.16.1.2 Scenic Resources

In accordance with the State Scenic Highway Program, the General Plan classifies scenic highways and routes throughout the City. No roadways or freeways within the BASASP area have been designated as scenic corridors, as additionally discussed below under *Regulatory Framework*.

While the BASASP area is mostly developed and constitutes a highly built environment, the Pacific Beach Community Plan/LCP Parks and Open Space Element, and the Clairemont Mesa Community Plan Open Space and Environmental Resources Element, and the Recreation Element of the General Plan identify some natural open space and park areas within and adjacent to the BASASP that can be considered visual resources.

Rose Creek is the primary open space area with scenic natural elements within the BASASP area. Flowing roughly north to south, it connects the communities of University City, Clairemont Mesa, and Pacific Beach, with Mission Bay. The Rose Creek bike path from Mission Bay to the Rose Canyon bike trail at the north end of Santa Fe Street is part of the Coastal Rail Trail planned to connect the City of Oceanside in the north with downtown San Diego. In the BASASP area, the Rose Creek drainage contains open water and riparian vegetation, as well as paved trails. Figures 5.16-1a and 5.16-1b, *Rose Creek Trail and Open Space*, depicts typical views along trails and within open spaces within the vicinity of the BASASP area. Rose Creek Cottage, a locally-recognized historic structure used for community events, is situated west of the BASASP area adjacent to Garnet Avenue and Rose Creek open space. The structure and outdoor use areas for Rose Creek Cottage are situated

View of Rose Creek and Garnet Avenue Bridge: Looking Eastbound from Rose Creek Cottage Area



View of Rose Creek Trail: Looking Southbound Toward Grand Avenue Bridge



View of Rose Creek Trail: Looking Northbound Near Hornblend Street



View of Rose Creek Trail: Looking Northeast Near Damon Avenue



away from the creek and fenced, although users who park at the facility have direct views into and across the creek into the BASASP area.

As noted in the Pacific Beach Community Plan (City 1995), “The majority of the parks and recreational facilities in Pacific Beach are oriented to the shoreline.” Nonetheless, there are some areas immediately adjacent to the BASASP area that would provide open space views to BASASP residents and users, and can be considered scenic resources.

Mission Bay Golf Course is located immediately south of Grand Avenue in the project vicinity. The grass-covered fairways and tees and mature landscaping associated with the facility provide some visual relief from the generally developed and urbanized character of the project area. Similarly, the adjacent Mission Bay Athletic Area (McAvoy Fields) is located between the golf course and Rose Creek, and would be visible to future built uses within the BASASP. In contrast to the golf course area, Mission Bay Athletic Area contains expansive paved parking areas and limited landscaping/turf, except for the ballfields.

5.16.1.3 Public Views

Public views are those provided from public resources such as freeways, public roadways, open space areas, public parks, and public recreation areas. Open public views into the project area are provided from I-5 and other primary public roadways (i.e., Garnet Avenue, Balboa Avenue, Morena Boulevard, Mission Bay Drive, and Grand Avenue) within the local communities. A description of the public views offered from these key vantage points is described herein.

Freeway Views

Motorists travelling on I-5, which bisects the BASASP in a north/south direction, are provided peripheral views directly into portions of the BASASP on either side of the freeway. According to Caltrans 2015 data from 2015 Traffic Volumes on California State Highways (<http://dot.ca.gov/trafficops/census/>), which provides a snapshot of the magnitude of travelers along the freeway, the section of freeway that crosses Balboa Avenue carries approximately 162,000 vehicles daily, with peak hour volumes of 13,600 vehicles. Although many freeway users travel through the BASASP on a daily basis, views from the freeway travel lanes are restricted by topography and intervening structures and are limited in duration due to freeway rates of travel speed (i.e., 65 mph).

With regard to views from the northbound lanes of I-5, south of the Balboa Avenue northbound off-ramp, the rail line and Morena Boulevard are elevated higher than the I-5 northbound roadbed (effectively blocking some eastward views from the freeway travel lanes). For a portion of the section of freeway that bisects the BASASP area, the I-5 southbound roadbed is lower in elevation than the northbound travel lanes, thus westward views from the northbound vantage point are unaffected. As freeway users travel north into the BASASP area, peripheral views of Mission Bay Park and the commercial/residential development west of the freeway are offered from the northbound lanes of I-5. However, north of Garnet Avenue/Balboa Avenue, freeway user views are limited to the backs of adjacent industrial uses along Morena Boulevard. Beyond this point, the I-5 travel lanes become slightly below the grade of developed uses to the east, including views to buildings (and storage areas) associated with nearby commercial development along Santa Fe Street. Beyond this point, the northbound lanes are no longer notably higher than the southbound lanes and adjacent uses,

and up to three-story buildings (e.g., Price Self Storage) and other developed uses are more visible. It is also at this point, however, the canyon/bluff topography associated with Rose Canyon becomes more dominant, and competes for viewer interest, drawing the eye northerly, rather than westerly.

For freeway users travelling southbound along I-5 and exiting the Rose Canyon setting, billboards and the rooftops of buildings set lower than the freeway elevation to the west are the first features noted upon entry into the BASASP area. Looking easterly from the southbound lanes of I-5, views are dominated by the northbound lanes of I-5 and adjacent commercial development. Although several taller structures draw the freeway traveler's eye westerly, the overall developed nature and the variety of built uses sets the character of a busy and varied commercial district. It is not until the traveler is south of Rosewood Street at the southern end of the BASASP area that westerly views to greener areas associated with Mission Bay Golf Course and Mission Bay Park begin to open up; water in Mission Bay does not become visible until south of and beyond the BASASP area.

Local Street Views

Although most of the local street volumes and speeds are lower than those of the freeway, the streets that bisect the BASASP area are highly congested throughout the day. Nonetheless, unobstructed views of development within the BASASP area are available from these public vantage points. Local streets are travelled by residents and workers who are very familiar with the visual conditions in the BASASP area, as well as visitors who are only experiencing views of the area temporarily. Primary examples of views from local streets are described below.

Traveling easterly along Garnet Avenue approaching the BASASP area to its transition to Balboa Avenue, the project area does not become visible until the vicinity of Soledad Mountain Road, where the road straightens and heads due east. Business/commercial uses and multi-family residential development edge the street all the way to I-5, with the rail line crossing and Morena Boulevard overpasses located in the background on the approach to the Mission Bay Drive intersection. Most of the views in the western portion of the BASASP area along Garnet Avenue are of single-story businesses and homes, although some two-story structures are interspersed. Billboards and other signage contribute elements to the views. Figure 5.16-2, *Garnet Avenue Views*, illustrates typical views along Garnet Avenue through the BASASP area.

The eastern portion of Balboa Avenue has unobstructed views toward the BASASP area for westbound travelers. Figure 5.16-3, *Balboa Avenue Views*, portrays typical views along Balboa Avenue within the BASASP area. The road is sited within a narrow canyon, and due to its curvilinear nature, westbound views to the BASASP area are not open until approximately the intersection of Balboa Avenue and Moraga Boulevard. From that location, the north-south extent of the view continues to be constrained by slopes on both sides of the route, as well as a three-story apartment building to the north of the road, with interchange ramps and the Morena Boulevard overpass being the primary view elements.

Along Morena Boulevard north of Balboa Avenue, BASASP land uses to the west are at grade or below grade of the street, and off-site developed uses to the east are up slope, as there is a substantial elevation difference between the road and developed uses farther up the hill. Views into and onto the Rose Canyon Operations Yard are generally open and consist of equipment, vehicles, and other various industrial elements that contribute negative visual clutter. From Morena Boulevard south of Balboa Avenue, the view onto the (under construction) Balboa Avenue Station is

View of Garnet Avenue: Looking Eastbound Near Bond Street



View of Garnet Avenue: Looking Westbound Near Mission Bay Drive



View of Balboa Avenue: Looking Westbound from West of I-5



currently not very open as there is a small berm between the road and raw dirt that is the current construction site. South of the future trolley station, views westerly toward the BASASP south of Balboa Avenue look over the railroad and to I-5, which is eight lanes wide in this area, with a center median. There are also intermittent trees along the west side of Morena Boulevard that can interrupt some views westerly. Limited views into the southern end of the BASASP and back side of existing structures are available from this vantage point. South of the BASASP area, views from Morena Boulevard include Mission Bay Park to the west and both hillside and street-level residential/commercial development.

Where uses west of the freeway are visible from public roads, between Bunker Hill Street and Rosewood Street, and the exit from I-5 to Mission Bay Drive/Grand Avenue, westward views include a mix of single-family and multi-family uses in one- and two-story structures, mixed with commercial uses such as motels, bus businesses, car dealerships, restaurants, jet-ski rentals, etc., although most of the latter uses are aligned along or near to Mission Bay Drive. North of Bunker Hill Street, there are additional car dealerships, car repair, apartments, bank, and small market uses, among others and views are limited to that of the adjacent commercial development.

All smaller two-lane neighborhood roads within the BASASP area also currently have views to residential and/or commercial/industrial uses that edge them. Due to the intensity and height of adjacent structures, those views are fairly limited and focused on development along those roads.

Rail Line Views

Amtrak and Coaster train users also have existing views onto the project area as they pass through the BASASP area. The train service does not have a passenger stop in this vicinity, however, and generally is passing through the BASASP area at a moderate rate of speed. Located slightly east of the I-5 northbound lanes in an elevated position within the BASASP area, train riders have views similar to motorists described above along I-5. Although the views are more direct as transit riders need not focus on navigating the travel corridor (being passengers and not drivers), the views overall are expected to be of short duration given the short north-south distance of the BASASP and the expectation that the train is moving quickly through the project area.

Park and Recreation Views

The BASASP area is mostly developed in nature, but several public parks occur within the Pacific Beach and Clairemont Mesa communities whose users could have views of the project. Generally interspersed within residential neighborhoods, views from these facilities, such as Kate Sessions Park, look beyond park boundaries into nearby uses which primarily encompass adjacent residences and roadways with some long-range views of Mission Bay. The BASASP area is not distinguishable from those distances and blends with the overall development in the area.

The closest public park to the BASASP area is Mission Bay Park, located south of Grand Avenue and the BASASP area, and west of Mission Bay Drive (Figure 1-2). Views to the park area are available from surrounding areas at higher elevations. Similarly, lands within the park offer views of the bay, as well as nearby developed hills and urban areas. Mission Bay Park is identified as the largest aquatic park of its kind in the country, with annual attendance estimated at 15 million (City 2017). The park includes over 4,235 acres, with roughly equal parts in land and water, and approximately 27 miles of shoreline.

De Anza Cove is the closest portion of Mission Bay Park to the BASASP area. This area has a volleyball area, a tot lot, park benches, picnic tables, and a path for jogging or bike riding. There is also a boat launch ramp for both boats and jet skis, and a comfort station with showers. Swimming, boating and water skiing are allowed and there is a lifeguard on duty for the summer months. A sand lot that can be used for over-the-line (OTL) games is also nearby. Due to its orientation to Mission Bay, park users in De Anza Cove are expected to generally be focused toward interior park uses or water views, which would orient their views more westerly/southerly away from the project. Toward the north end of Mission Bay Park nearest to the project, no unobstructed views to BASASP areas are available from the park, as there are intervening uses (the Mission Bay Golf Course, Mission Bay High School, Campland on the Bay, etc.) and mature landscaping.

Even closer to the project area is Mission Bay Golf Course, located immediately south of Grand Avenue and across the street from the southern BASASP boundary. Views from the golf course look through a chain link fence and landscaping toward the BASASP area. Figure 5.16-4, *Grand Avenue and Mission Bay Drive Views*, illustrate typical views from Grand Avenue and Mission Bay Drive within the BASASP area. At the north and east sides of the golf course, views are of the busy five-lane Mission Bay Drive in the foreground and two-story apartments, motels, and car dealership uses beyond the road. Looking north across the four-lane (with median) Grand Avenue, the golf course viewer sees additional car dealerships and series of two-story apartments. Nonetheless, it is likely that the golf course users are focused on the active play, away from Mission Bay Drive, Grand Avenue, and the BASASP area.

The Mission Bay Athletic Facility is a public use area located immediately west of Mission Bay Golf Course, east of Rose Creek, and south of Grand Avenue (Figure 1-2). The facility contains lighted tennis courts, a basketball court, and ball fields. Users of these active recreation facilities could have views to the project, especially from the basketball court and ballfields closest to Grand Avenue. In general, however, users would be expected to be focused on the active play, away from Grand Avenue and the BASASP area. Thus, views are limited due to the recreation activities that are the focus of users.

Scenic View Corridors

Although not associated with designated open space areas, roads, parks, or significant visual landmarks, both the Pacific Beach Community Plan/LCP and the Clairemont Mesa Community Plan identify scenic view corridors.

In the Pacific Beach Community Plan/LCP, Figure 16 identifies “coastal views.” Although most are directly along the ocean or bay, and oriented toward the very close water view, one locale is shown from I-5, where an “intermittent view” is identified toward the coast for approximately 1,700 feet north and south of the Garnet Avenue/Balboa Avenue crossing and north of Bunker Hill Street. This locale looks directly over BASASP area and uses east of Mission Bay Drive. The area is developed, with one-, two-, and three-story uses, but primarily car lots/parking.

In the Clairemont Mesa Community Plan, Figures 2 and 3 identify long range views over the BASASP area, as well as to the north and south of the area from the Stevenson Canyon/Regents Road area south to Clairemont Drive. The identified view corridors south of Balboa Avenue are oriented southwest and south, with the vistas focused on locales south of the BASASP area. Those north of Balboa Avenue, however, would encompass portions of the project.



View of Grand Avenue:
Looking Westbound Near
Figueroa Boulevard

View of Grand Avenue:
Looking Eastbound Near
Figueroa Boulevard



View of Mission Bay Drive:
Looking Southbound
Near Magnolia Avenue

View of Mission Bay Drive:
Looking Northbound
Near I-5 Ramp



5.16.1.4 Community and Neighborhood Character

Photographs depicting the overall setting and character of the project area are provided in Figures 5.16-5a through 5.16-5d, *Existing Visual Character*.

Land use patterns and associated focused character elements are generally aligned along and divided by the primary roadways. The various transportation elements in the project area contribute a strongly urban element to the area's character. Although underpasses connect the east and west sides of the BASASP, the large-scale and elevated positions of I-5 freeway and rail line corridor provide a substantial dividing line between east and west sides of the BASASP area. In addition, the circuitous routes by which the east and west sides of the BASASP are connected bar visual and physical connections, which can contribute to a divided community. Within the relatively small BASASP area, there is a broad range of development styles, character, and uses (as described above). The area features multiple land uses, building types and forms, architectural styles, and structure colors which do not combine to make a coherent visual setting.

Residential areas that dominate the western portion of the BASASP area provide varied character due to the individual home styles, variety of colors, amount and style of landscaping, and interspersed mix of single-family with multi-family structures, resulting in no discernable pattern to building style or massing. Residential units in the eastern portion of the BASASP area are highly interspersed with commercial and office uses with a variety of building masses (i.e., one-, two- and three-story structures), highly individualized architectural styles, and a range of landscape treatments; similar to the other residential areas of the BASASP, there is no discernable pattern that informs the character of the area.

The commercial businesses located along major public streets, such as Mission Bay Drive and Garnet Avenue, generally consist of large-scale uses, including the aforementioned self-storage areas and car dealerships, interspersed with smaller-scale business such as gas stations, fast-food restaurants, and retail spaces, as well as residential units. Multi-story motels are present in several commercial areas within the BASASP. Similar to the residential development within the BASASP area, there is no common character to the commercial development.

The industrial operations and businesses adjacent to and east of I-5 feature large-scale structures that have little to no unique features, extensive surface parking areas, storage yards containing equipment, and minimal landscaping. The industrial development features expansive hardscape, strip areas of common development of differing massing and design, and interspersed individual stand-alone and idiosyncratic businesses. Therefore, much of the industrial development is highly individualized and no common character exists.

As noted above, most of the BASASP area is highly urbanized. The exception to this heavily developed character is the Rose Creek drainage and associated vegetation along the western boundary, which features natural elements that both contrast with the built environment and provide visual relief (refer Figure 5.16-1). Although parks and open space occur in the project vicinity, they are either just beyond the boundaries of the BASASP area or hidden within canyons and do not provide much visual relief to the urbanized project area.

Overall, the visual character of the BASASP area is largely defined by the relatively mixed nature, and individually developed, residential, commercial, and light industrial uses and visually inconsistent

elements. Variation is present in structure height (one to three stories), massing, presence/absence of black top/parking lots, presence/absence of vegetation (and where present, its density, height, and aspect), incorporation of glass walls, presence and style of signage, range in privacy barriers in height and materials from wood to chain link, and use of architectural styles ranging from ranch, mid-century, cottage, and modern, etc. Excluding the noted building height restrictions that require structures not to exceed 30 feet, the community exhibits no distinct or consistent style. The mix of different uses, and the idiosyncratic way that development has occurred over time, contains some unique and individually coherent elements, but overall results in visual disharmony.

5.16.2 Regulatory Framework

Existing policies, design guidelines, and development regulations provide relevant visual quality and neighborhood character policies for development in the proposed BASASP area. These include the General Plan, community plans, the LDC, ESL Guidelines, and Coastal Overlay Zone.

5.16.2.1 General Plan

The Urban Design Element of the General Plan provides guidance for the development of village environments, including high-quality public spaces, civic architecture, and the enhancement of visual quality. The Urban Design Element includes City-wide design goals and policies regarding visual elements that complement the goals for pedestrian-oriented and walkable villages from the City of Villages strategy. The Urban Design Element policies relevant to visual quality are focused on the various design, elements, and character in communities and are presented below in Table 5.16-1, *Urban Design Element Policies Related to Visual Quality*, and in Section 5.1, *Land Use*.

**Table 5.16-1
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY**

Policy	Description
UD-A.2	<p>Use open space and landscape to define and link communities</p> <ul style="list-style-type: none"> • Preserve and encourage preservation of physical connectivity and access to open space.
UD-A.3	<p>Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p> <ul style="list-style-type: none"> • Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units or other alternatives to slab foundations to minimize the amount of grading. • Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized. • Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized. • Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.

View of Industrial on Morena Boulevard: Looking South



View of Industrial on Santa Fe Street: Looking North



View of Offices on Del Rey Street: Looking Westbound on Del Rey Street



View of Offices on Revere Avenue: Looking Eastbound on Bunker Hill Street



View of Multi-family on Grand Avenue: Looking North Near Rose Creek



View of Residential Along Hornblend Street: Looking East



View of Commercial on Garnet Avenue: Looking Eastbound



View of Balboa Avenue Station Site: Looking Westbound from Above Morena Boulevard



Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-A.3 (cont.)	<ul style="list-style-type: none"> • Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas. • Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. • Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. • Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. • Provide public pedestrian, bicycle, and equestrian access paths to scenic viewpoints, parklands, and where consistent with resource protection, in natural resource open space areas.
UD-A.4	Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.
UD-A.5	<p>Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ul style="list-style-type: none"> • Relate architecture to San Diego's unique climate and topography. • Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. • Encourage the use of materials and finishes that reinforce a sense of quality and permanence. • Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height, or texture to provide visual interest. • Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs, and recessed doorways are used to provide visual interest at the pedestrian level. • Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street. • Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments. • Maximize natural ventilation, sunlight, and views. • Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances. • Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-A.6	<p>Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.</p> <ol style="list-style-type: none"> Locate buildings on the site so that they reinforce street frontages. Relate buildings to existing and planned adjacent uses. Ensure that building entries are prominent, visible, and well-located. Maintain existing setback patterns, except where community plans call for a change to the existing pattern. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.
UD-A.8	<p>Landscape materials and design should enhance structures, create, and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.</p> <ol style="list-style-type: none"> Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J). Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available. Use landscape to support storm water management goals for filtration, percolation, and control erosion Use landscape to provide unique identities within neighborhoods, villages, and other developed areas. Landscape materials and design should complement and build upon the existing character of the neighborhood. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the City that contain tree-lined streets present a streetscape that creates a distinctive character. <ol style="list-style-type: none"> Identify and plant trees that complement and expand on the surrounding street tree fabric. Unify communities by using street trees to link residential areas. Locate street trees in a manner that does not obstruct ground illumination from streetlights. Shade paved areas, especially parking lots. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers. Use landscaped walkways to direct people to proper entrances and away from private areas. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-A.9	<p>Incorporate existing and proposed transit stops or stations into project design (see also Mobility Element, Policies ME-B.3 and ME-B.9).</p> <ul style="list-style-type: none"> a. Provide attractively designed transit stops and stations that are adjacent to active uses, recognizable by the public, and reflect desired neighborhood character (see also Land Use Element, Policy LU-I.11). b. Design safe, attractive, accessible, lighted, and convenient pedestrian connections from transit stops and stations to building entrances and street network (see also Land Use Element, Policy LU-I.10). c. Provide generous rights-of-way for transit, transit stops or stations. d. Locate buildings along transit corridors to allow convenient and direct access to transit stops/stations
UD-A.10	<p>Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).</p>
UD-A.11	<p>Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking (see also Mobility Element, Section G).</p> <ul style="list-style-type: none"> a. Design safe, functional, and aesthetically pleasing parking structures. b. Design structures to be of a height and mass that are compatible with the surrounding area. c. Use building materials, detailing, and landscape that complement the surrounding neighborhood. d. Provide well-defined, dedicated pedestrian entrances from pedestrian areas. e. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets. f. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security.
UD-A.12	<p>Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).</p> <ul style="list-style-type: none"> a. Encourage placement of parking along the rear and sides of street-oriented buildings. b. Avoid blank walls facing onto parking lots by promoting treatments that use colors, materials, landscape, selective openings, or other means of creating interest. For example, the building should protrude, recess, or change in color, height, or texture to reduce blank facades. c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations. d. Locate pedestrian pathways in areas where vehicular access is limited. e. Avoid large areas of uninterrupted parking especially adjacent to community public view sheds. f. Build multiple small parking lots in lieu of one large lot. g. Retrofit existing expansive parking lots with street trees, landscape, pedestrian paths, and new building placement. h. Promote the use of pervious surface materials to reduce runoff and infiltrate storm water.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-A.12 (cont.)	<ul style="list-style-type: none"> i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots (see also Conservation Element, Policy CE-A.12). j. Design surface parking lots to allow for potential redevelopment to more intensive uses. For example, through redevelopment, well-placed parking lot aisles could become internal project streets that provide access to future parking structures and mixed land uses.
UD-A.13	<p>Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <ul style="list-style-type: none"> a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility. b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting. c. Use lighting to convey a sense of safety while minimizing glare and contrast. d. Use vandal-resistant light fixtures that complement the neighborhood and character. e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated.
UD-A.14	<p>Design project signage to effectively utilize sign area and complement the character of the structure and setting.</p> <ul style="list-style-type: none"> a. Architecturally integrate signage into project design. b. Include pedestrian-oriented signs to acquaint users to various aspects of a development. Place signs to direct vehicular and pedestrian circulation. c. Post signs to provide directions and rules of conduct where appropriate behavior control is necessary. d. Design signs to minimize negative visual impacts. e. Address community-specific signage issues in community plans, where needed.
UD-A.16	<p>Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.</p> <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventors, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible. To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered, and integrated into the landscape design, and screened from public view with plant and/or fence-like elements. c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-B.1	<p>Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.</p> <ul style="list-style-type: none"> a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development. b. Design new construction to respect the pedestrian orientation of neighborhoods. c. Provide innovative designs for a variety of housing types to meet the needs of the population.
UD-B.4	<p>Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.</p> <ul style="list-style-type: none"> a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Provide ground level entries and ensure that building entries are prominent and visible. d. Maintain existing setback patterns, except where community plans call for redevelopment to change the existing pattern. e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community. f. Encourage side- and rear-loaded garages. Where not possible, reduce the prominence of the garage through architectural features and varying planes. g. Minimize the number of curb-cuts along residential streets.
UD-B.5	<p>Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.</p> <ul style="list-style-type: none"> a. Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community. b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources. c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary. d. Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools. Design new streets and consider traffic calming where necessary, to reduce neighborhood speeding (see also Mobility Element, Policy ME-C.5). f. Enhance community gateways to demonstrate neighborhood pride and delineate boundaries.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-B.5 (cont.)	<ul style="list-style-type: none"> g. Clarify neighborhood roadway intersections through the use of special paving and landscape. h. Develop a hierarchy of walkways that delineate village pathways and link to regional trails. i. Discourage use of walls, gates and other barriers that separate residential neighborhoods from the surrounding community and commercial areas.
UD-B.6	Utilize alleys to provide improved and alternative pedestrian access to sites. This would include consideration of a promenade or paseo design for alleys with enhanced landscaping, and residential units or uses that face the alleys to activate them as alternative pedestrian streets. This could provide an alternative function for alleys that is non-vehicular, but still provides linkages to other sites and uses and adds to a neighborhood's connectivity.
UD-B.8	<p>Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.</p> <ul style="list-style-type: none"> a. Design attractive recreational facilities, common facilities, and open space that can be easily accessed by everyone in the development it serves. b. Design outdoor space as "outdoor rooms" and avoid undifferentiated, empty spaces. c. Locate small parks and play areas in central accessible locations.
UD-C.2	Design village centers to be integrated into existing neighborhoods through pedestrian-friendly site design and building orientation, and the provision of multiple pedestrian access points.
UD-C.3	<p>Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.</p> <ul style="list-style-type: none"> a. Encourage distinctive architectural features to differentiate residential, commercial, and mixed-use buildings and promote a sense of identity to village centers.
UD-C.4	<p>Create pedestrian-friendly village centers (see also Mobility Element, Sections A and C). Respect pedestrian-orientation by creating entries directly to the street and active uses at street level.</p> <ul style="list-style-type: none"> b. Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level. c. Orient buildings in village centers to commercial local streets, or to internal project drives that are designed to function like a public street, in order to create a pedestrian-oriented shopping experience, including provision of on-street parking. d. Provide pathways that offer direct connections from the street to building entrances. e. Break up the exterior facades of large retail establishment structures into distinct building masses distinguished by offsetting planes, rooflines and overhangs or other means. f. Where feasible, use small buildings in key locations to create a human scale environment in large retail centers. Incorporate separate individual main entrances directly leading to the outside from individual stores.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-C.5	<p>Design village centers as civic focal points for public gatherings with public spaces (see also UD-C.1 for village center public space requirements and UD-E.1 for the design of public spaces).</p> <ul style="list-style-type: none"> a. Establish build-to lines to frame and define village center public space and pedestrian streets. b. Ensure public spaces are easily accessible and open to the public. The mechanisms used to provide the public space will vary as appropriate and could include, but are not limited to: land dedications, joint use agreements, and public access easements. Public space areas may include reasonable hours of use restrictions, demarcation of private and publicly accessible areas, and other signage to communicate public access rights, responsibilities, and limitations. c. Encourage provision of public space in the earliest possible phase of development, as determined by the public's ability to use and access the space.
UD-C.7	<p>Enhance the public streetscape for greater walkability and neighborhood aesthetics (see also UD-A.10 and Section F).</p> <ul style="list-style-type: none"> a. Preserve and enhance existing main streets. b. Establish build-to lines, or maximum permitted setbacks on designated streets. c. Design or redesign buildings to include architecturally interesting elements, pedestrian friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground-floor level. d. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees, pedestrian-scaled lighting and signs, landscape, and street furniture. e. Relate the ground floor of buildings to the street in a manner that adds to the pedestrian experience while providing an appropriate level of privacy and security. f. Design or redesign the primary entrances of buildings to open onto the public street.
UD-D.2	<p>Assure high quality design of buildings and structures. The design and orientation of buildings within projects affect the pedestrian- and transit-orientation.</p> <ul style="list-style-type: none"> a. Design buildings to have shadow-relief where pop-outs, offsetting planes, overhangs, and recessed doorways are used to provide visual interest, particularly at the street level. b. Design rooftops and the rear elevations of buildings to be as well detailed and visually interesting as the front elevation, if it will be visible from a public street. c. Locate outdoor storage areas, refuse collection areas, and loading areas in interior rear or side yards and screen with a similar material and color as the primary building.
UD-D.3	<p>Assure high-quality design in parking areas, which often provide the first impression and identification of a project to a client, employee, or resident.</p> <ul style="list-style-type: none"> a. Utilize a combination of trees and shrubs at the edge of parking areas to screen parking lots and structures from the street. b. Distribute landscape areas between the periphery and interior landscaped islands. c. Design landscape to break-up large paved areas.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-E.1	<p>Include public plazas, squares or other gathering spaces in each neighborhood and village center (see also UD-C.1 and UD-C.5 for additional public space requirements in village centers, and UD-F.3 for policy direction on public art and cultural activities in public spaces).</p> <ul style="list-style-type: none"> a. Locate public spaces in prominent, recognizable, and accessible locations. b. Design outdoor open areas as “outdoor rooms,” developing a hierarchy of usable spaces that create a sense of enclosure using landscape, paving, walls, lighting, and structures. c. Develop each public space with a unique character, specific to its site and use. d. Design public spaces to accommodate a variety of artistic, social, cultural, and recreational opportunities including civic gatherings such as festivals, markets, performances, and exhibits. e. Consider artistic, cultural, and social activities unique to the neighborhood and designed for varying age groups that can be incorporated into the space. f. Use landscape, hardscape, and public art to improve the quality of public spaces. g. Encourage the active management and programming of public spaces. h. Design outdoor spaces to allow for both shade and the penetration of sunlight. i. Frame parks and plazas with buildings which visually contain and provide natural surveillance into the open space. j. Address maintenance and programming.
UD-E.2	<p>Treat and locate civic architecture and landmark institutions prominently.</p> <ul style="list-style-type: none"> a. Where feasible, provide distinctive public open space, public art, greens, and/or plazas around civic buildings such as courthouses, libraries, post offices, and community centers to enhance the character of these civic and public buildings. Such civic and public buildings are widely used and should form the focal point for neighborhoods and communities. b. Incorporate sustainable building principles into building design (see also Conservation Element, Section A). c. Civic buildings at prominent locations, such as canyon rims, sites fronting open space, sites framing a public vista, and those affording a silhouette against the sky should exhibit notable architecture. d. Encourage innovative designs that civic and public buildings and landmarks from the surrounding neighborhood as a means of identifying their role as focal points for the community. e. Support the preservation of community landmarks.
UD-F.1	<p>Integrate public art and cultural amenities that respond to the nature and context of their surroundings. Consider the unique qualities of the community and the special character of the area in the development of public art and programming for cultural amenities.</p> <ul style="list-style-type: none"> a. Use arts and culture to strengthen the sense of identity of the Neighborhood and Urban Village Centers of each community. b. Use public art and cultural amenities to improve the design and public support for public infrastructure projects. c. Reinforce community pride and identity by encouraging artworks and cultural amenities that celebrate the unique cultural, ethnic, historical, or other attributes of each unique neighborhood. d. Use public art and cultural amenities as a means to assist in implementation of community-specific goals and policies.

Table 5.16-1 (cont.)
URBAN DESIGN ELEMENT POLICIES RELATED TO VISUAL QUALITY

Policy	Description
UD-F.1 (cont.)	<ul style="list-style-type: none"> e. Use public art and cultural amenities as community landmarks, encouraging public gathering and wayfinding. f. Encourage involvement of recognized community planning groups and other community stakeholders in the decision-making process regarding public art and cultural amenities.
UD-F.3	<p>Enhance the urban environment by animating the City's public spaces.</p> <ul style="list-style-type: none"> a. Utilize public art and cultural amenities such as festivals to create vibrant and distinctive public squares, plazas, parks, and other public gathering spaces. b. Ensure that public artworks respond to the nature of their surroundings both physically and conceptually. c. Encourage the use of public art in highly visible places as a directional assistance that can be used to delineate access routes and entrance points. d. In high foot traffic areas, use pedestrian-oriented art interventions to enhance the pedestrian experience. e. Highlight points of interest throughout the City through the use of artwork and cultural amenities. f. Encourage artworks and activities that animate public spaces and energize the cityscape. g. Encourage temporary public artworks to create a dynamic changing and engaging environment. h. Encourage artist-designed infrastructure improvements within communities such as utility boxes, street-end bollards, lampposts, and street furniture. i. Encourage incorporation of vandal-resistant and easily repairable materials in art to reduce maintenance requirements. j. Encourage the programming of changing exhibits and public uses through active management and programming of public spaces. k. Encourage a range of activities, easy access, a clean and attractive environment, and a space for people to socialize in order to attract legitimate users and thereby discourage improper behavior. l. Provide front porches, parks, plazas, and other outside public spaces for residents to socialize.

Source: City 2008a

5.16.2.2 Pacific Beach Community Plan/LCP

The Pacific Beach Community Plan/LCP (1995 as amended through 2005) notes that the community strives to reconcile the duality of its roles as a visitor destination and a residential community, and that the desirable aspects of the community (e.g., the beach, bay, Kate Sessions Park and scenic vistas) will be enhanced through improved identification and access, while negative impacts associated with increased traffic congestion will be minimized through provision of affordable and convenient public transit. The Pacific Beach Community Plan contains the following park and open space goals relevant to scenic resources in the BASASP area:

- Preserve significant environmental resource areas, such as Rose Creek in their natural state.
- Improve access to beach, bay, and park areas along the shoreline to benefit residents and visitors.

- Maintain and enhance public views to the Pacific Ocean, Mission Bay, the Northern Wildlife Preserve and Kate Sessions Park.

Relevant commercial design standards for commercial zoning include:

- Include techniques that will incorporate the use of massing variations, utilizing varied front yard setback and articulated building facade requirements.
- Promote the utilization of alley access and minimize the number of allowed curb cuts, particularly on pedestrian-oriented streets such as Mission Boulevard.
- Enhance pedestrian activity by requiring entryways and windows at the street level, and encourage the development of first floor retail and upper floor residential mixed-use projects through the use of floor area ratio bonuses.
- Consider provisions that will limit the impact of new commercial development on adjacent residential development through the use of sound attenuation measures, limitations on certain commercial uses or other forms of buffering where appropriate.

TOD is defined, including the focus on a pedestrian-oriented mixed-use pattern of land uses, and relevant commercial area design standards include:

- Minimize building setbacks, bringing buildings close to sidewalks; locate parking to the rear of lots, off of the alleys.
- Articulate building facades to provide variety and interest through arcades, porches, bays and particularly balconies, which minimize a walled effect and promote activity on the street. Promote activity on balconies through such means as outdoor seating for restaurants.
- Orient primary commercial building entrances to the pedestrian-oriented street, as opposed to parking lots.
- Provide, if space permits, public plazas or courtyards along pedestrian-oriented streets to serve residents and workers. Encourage public art in these areas where appropriate.
- Utilize parking structures instead of surface parking for larger commercial developments; locate retail uses on the street level of parking garages to preserve the life and activity at the street.

Development in the Coastal Zone specifically provides sign restrictions:

- Limit signage to conform with the citywide sign ordinance. Rooftop signs, free-standing pole signs, off-premise signs and billboards shall not be permitted with new development.

Under the heading Specific Proposals, the Pacific Beach Community Plan addresses relevant commercial designations that apply to the use, and therefore visual character, of specific streets within the BASASP area. These include recommendations to:

1. Designate the Mission Bay Drive commercial area for regional-serving and visitor-serving commercial use and apply commercial zoning that provides for a mix of larger scale retail, wholesale, commercial service, hotel, and business/professional office uses. In the area designated for regional commercial uses, both large scale retail, such as automobile dealerships, and small-scale retail, such as hotels and restaurants shall be permitted. In the areas designated for visitor commercial uses, which includes the area closest to Mission Bay Park, only visitor-serving uses shall be permitted.
2. Designate the eastern Garnet Avenue area for community-serving commercial uses. Apply zoning which will accommodate small to medium scale community-serving retail, commercial service and business/professional offices.

5.16.2.3 Clairemont Mesa Community Plan

As noted in the Clairemont Mesa Community Plan (City 1989 as amended through 2011), Clairemont Mesa is an urbanized residential community with streetscape parkways and many neighborhoods overlooking Mission Bay and the Pacific Ocean. Residential neighborhoods are largely single-family in nature, with multi-family uses aligned along major community roadways, such as Balboa Avenue. A 30-foot height limit has been adopted for almost all of Clairemont Mesa, “intended to maintain the low-scale character of development in the community and to preserve public views of Mission Bay and the Pacific Ocean from western Clairemont” (City 1989 as amended through 2011:29). Long-range views to the west and southwest are identified in the Community Plan on Figure 5, and include views over Morena Boulevard both north and south of Balboa Avenue.

The Clairemont Mesa Community Plan also identifies hillsides addressed under a Hillside Review Overlay Zone on Figure 9 of that plan. The BASASP area is not located within areas identified for hillside review.

The Clairemont Mesa Community Plan provides suggestions for the industrial area north of Balboa Avenue and east of I-5 (City 1989 as amended through 2011:53) that would enhance the area’s visual aspect.

Most of this industrial area is zoned for industrial park development (M-IP). Rose Creek/Canyon industrial area is visible from I-5 and has limited access from Santa Fe Street and Morena Boulevard. Examples of uses in this area include wholesale of furniture, printing services and energy conservation and research.

The Rose Canyon Public Works service yard, San Diego Gas and Electric Company (SDG&E) and Santa Fe Visitor Trailer Park are also located in this area. Both the service yard on Morena Boulevard and the SDG&E on Santa Fe Street need some screening along the public right-of-way with landscaping and/or a masonry wall.

Some of the industrial sites along Morena Boulevard and Santa Fe Street have large areas of surface parking with no landscaping. Development in this area would benefit from the elimination of illegal and non-conforming signs and improved landscaping along the public right-of-way and within parking areas. The newer development in Rose Creek/Canyon along Morena Boulevard consists of offices and research and development facilities that are well landscaped with lawns,

pine trees and eucalyptus trees. This development is also highly visible from I-5 and should serve as an example for redevelopment of the older industrial sites in this area.

The Clairemont Mesa Community Plan cites redevelopment and rehabilitation as a goal, to improve the physical appearance, landscaping, off-street parking and circulation” (City 1989 as amended through 2011:55). The Community Plan suggests future development of the sites should be for research and development. Specific to the Rose Canyon Public Works service yard and SDG&E facility (City 1989 as amended through 2011:60), it is recommended that these facilities:

...should have landscaping or a wall along the perimeter of the site in order to screen the parking lot and equipment from the public right-of-way. If a fence or wall is located along the perimeter of the site and is visible from the public right-of-way, landscaping should be required to ensure aesthetic screening of the service yard and compatibility with the surrounding development.

Associated with development of the Balboa Avenue Station being completed by others, the Clairemont Mesa Community Plan recommends the following with regard to visual effects (City 1989 as amended through 2011:85 and 89, respectively):

- The intersection of Balboa Avenue and I-5 should have improved landscaping in the public right-of-way with a community identification sign.
- Streets with expected high pedestrian volumes, such as Balboa Avenue and Morena Boulevard, should have wider sidewalks to enhance pedestrian circulation.
- Landscaped berms, landscaping, walls and/or wheel stops should be installed along parking lot perimeter. Masonry walls or other appurtenances should not be constructed in such a way as to restrict sight distances at driveways.

5.16.2.4 Balboa Avenue Revitalization Action Program

The Balboa Avenue RAP implements a vision for pedestrian-oriented improvements to Balboa Avenue within Clairemont Mesa. The RAP provides recommendations for the Balboa Avenue ROW including: landscaping, street design, and walkways and crossings. The project is located within the western-most extent of the RAP Segment Four (Western Gateway-Clairemont Drive to I-5), and incorporates the Morena Boulevard ramps west of Moraga Avenue and connection of the sidewalk between Mission Bay Drive and Moraga Avenue.

5.16.2.5 Land Development Code

The City’s LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights; maximum lot coverage; floor area ratios; and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design that affect visual quality.

5.16.2.6 ESL Regulations and Steep Hillside Regulations

The LDC also contains development restrictions and guidelines to protect and enhance environmentally sensitive lands. Steep hillsides are defined as those with natural gradients equal to

or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. The BASASP area does not contain any steep hillsides meeting these criteria, and these regulations are not further discussed.

Grading Regulations

The LDC (Section 142.0101 et seq.) contains grading regulations to address (among other things) landform preservation and require that all grading to be designed and performed in conformance with applicable City Council policies and the standards established in the Land Development Manual.

Coastal Overlay Zone

The BASASP area is located partially within the Coastal Overlay Zone. Development within the Coastal Overlay Zone requires a CDP. The Coastal Height Limit Overlay Zone limits new buildings or additions to existing structures to a 30-foot height limit.

5.16.3 Significance Determination Thresholds

Based on the City Significance Determination Thresholds (City 2016a), as modified to reflect a programmatic analysis for the proposed BASASP, impacts related to visual effects and neighborhood character would be significant if the proposed BASASP would:

1. Block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas;
2. Negatively and substantially alter the character of the neighborhood; or
3. Result in a substantial change to the natural topography or landform.

5.16.4 Issue 1: Public Views

Would the proposed BASASP result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan, the General Plan or the Local Coastal Program?

5.16.4.1 Impacts

No designated scenic roadways are located within the BASASP, nor is the BASASP within the viewshed of a scenic roadway outside the BASASP area. Similarly, no scenic sites are identified in either the Pacific Beach Community Plan/LCP or the Clairemont Mesa Community Plan.

The proposed project would modify the land use designations and zoning within the Pacific Beach community and would establish urban design policies and supplemental development regulations for lands designated Community Village to allow for the removal of the ground-floor height requirement for properties in the Community Village designation in the Community Commercial (CC-3-8 and CC-3-9) zone, among other requirements. Reduction of the ground floor height requirements would allow properties within the BASASP area to be developed with more flexibility in minimum ground-floor height to allow structures that are three stories but still comply with the

30-foot Coastal Overlay Zone height limit. Therefore, the project would not exceed the allowed height or bulk regulations permitted in the BASASP area.

The only public viewing area adjacent to and within the BASASP area that contains a public resource is the Rose Creek open space. For its entire distance within the BASASP area, urban development is fully built up to the edge of the open space, with residential, commercial, and industrial structures often blocking views from public vantage points to this down-slope feature. As such, implementation of the BASASP that would retain or redevelop those existing structures would not have the potential to block existing views of the creek and its open space. The most accessible views to the creek are available along existing portions of the bike trail. The BASASP includes policies in the Mobility and Urban Design Chapters that support an enhancing access to the Rose Creek bike trail. Those views would continue toward the immediately adjacent floodway on the west. To the east, views toward the BASASP could vary from existing conditions following redevelopment; however, development of the BASASP would not be expected to substantially block views toward the creek. The BASASP includes policies that encourage public use areas such as pavilions or restaurants with outdoor dining to be sited near the Rose Creek open space, potentially increasing views to the open space, as compared to the existing conditions.

As described above, one of San Diego's regionally recognizable resources, Mission Bay Park, is in close proximity to the BASASP area. Implementation of the BASASP would allow for the intensification and redevelopment of the project area. Because park use areas are separated from the BASASP area by intervening uses, and accompanying views are focused southwesterly toward the bay (rather than toward the BASASP area to the north and east), implementation of the BASASP would not cause substantial view blockage from a public viewing area of a public resource and less than significant impacts to views in Mission Bay Park are identified.

There are some recreational areas from which closer BASASP area views are possible such as the Mission Bay Golf Course and the fields and courts of the Mission Bay Athletic Facility, as described above in Section 5.16.1. Implementation of the BASASP also would not result in substantial view blockage from these areas because users who choose to look northerly from these recreation areas would continue to see multi-story structures directly across Grand Avenue and Mission Bay Drive, and BASASP development would not cause substantial view blockage from a public viewing area of a public resource. In addition, these views are not identified view corridors in the community plans.

With regard to the scenic views recognized in the community plans, views from I-5 of Mission Bay and other scenic resources recognized in the Pacific Beach Community Plan are currently intermittent in nature due to existing development. Therefore, redevelopment of lower stature structures as part of the BASASP would not block or obscure views as the future structures would be comparable in bulk and scale to existing buildings along the I-5 corridor. Direct views onto the bay offered from the southbound I-5 would be unaffected by the project since those views occur south of the project area. Grand Avenue is also identified in the plan as having intermittent views of water from the crossing of Rose Creek to the entry to De Anza Cove. These views are all directed south or west toward the water, and not in the direction of the project. Within Clairemont Mesa, the view lines from the locations identified in the community plan all appear to be at elevations of approximately 300 feet AMSL, which would allow for the continued views over any structures associated with future development under the BASASP. Thus, no view corridor obstructions would occur as a result of BASASP implementation.

5.16.4.2 Significance of Impact

The proposed BASASP would not substantially alter or block public views from public viewing areas within the BASASP area. Impact levels would range from no impact to less than significant.

5.16.4.3 Mitigation Framework

As impacts would be less than significant, no mitigation is required.

5.16.4.4 Significance After Mitigation

Impacts related to public views would be non-existent to less than significant.

5.16.5 Issue 2: Neighborhood Character

Would the proposed BASASP negatively or substantially alter the character of the neighborhood?

5.16.5.1 Impacts

As described above, the existing character of the BASASP area is diverse and without overall unifying development elements or architectural styles. Even within focused areas, there is little continuity in style and design. This is supported by diversity in each of the uses, as described above in Section 5.16.1 under *Neighborhood and Community Character*.

The proposed BASASP provides the framework for the buildout of the BASASP area, and contains specific goals and policies to provide direction on what types of future uses and public improvements should occur. It establishes the distribution, pattern, and intensity of land uses and establishes site and build design policies to promote a transit-oriented village. Land uses designated in the BASASP would include a mix of residential, commercial, industrial, and open space uses. The variety of proposed land use types under the BASASP would not be substantially different than currently exist, but the patterns (and to some extent the distribution) of those uses would change.

With implementation of the BASASP, portions of the area would change from their existing lower-density, single use condition to a higher density, mixed-use village with direct pedestrian, bike, and vehicular connections to the Balboa Avenue Station. Residential uses would be additionally incorporated into mixed use areas with associated commercial and passive recreational uses. The BASASP envisions building designs and streetscapes that support pedestrian activity and would be further enhanced with pedestrian amenities, plazas, and public art, additionally linked by bicycle improvements recommended in the BASASP.

Provision of higher density uses near transit and community activity areas is consistent with the City of Villages Strategy, and would not severely contrast with the existing neighborhood character. The proposed BASASP contains urban design policies that address bulk and scale and urban form to guide development within the BASASP area that would be compatible with the existing and surrounding neighborhood character. In addition, land use controls, such as allowable land uses and development regulations per zoning designations provide further guidance on development forms by establishing maximum residential densities, floor area ratios, and building heights. Future

discretionary projects would be reviewed for compliance with the BASASP policies and supplemental development regulations.

As shown in Figure 3-1, the proposed BASASP area would have four distinct land use designations: residential, industrial park, community village, and flood control/open space. Additionally, the area includes public right-of-way, consisting of existing area streets that connect the entire BASASP area as well as the incorporated Balboa Avenue Station. The BASASP Urban Design chapter contains specific policies to guide project development, focusing on building designs and streetscapes that support pedestrian activity. The Plan does not propose any changes to the land designated for industrial use in the northeast portion of the BASASP area. Elements focused on the majority of the plan area that are integral to community character are described below.

The BASASP includes policies to encourage buildings to front directly onto and orient towards public streets, pedestrian pathways, and/or public space; avoid uninterrupted blank walls along all building facades; and create a strong sense of edge along streets by providing consistent building setbacks. Along with these policies, a number of massing, articulation, parking and shielding of service area standards would contribute directly to creating visually distinct, yet unified and coherent, uses. These policies encourage building massing and articulation to promote a pedestrian-oriented scale, and differentiating the mass and scale of buildings through varying rooflines, heights, and profiles; incorporating vertical and horizontal modulations (e.g., use recessed façade elements, balconies, etc.), and using color and/or architectural elements (including changes in wall materials and colors) to promote visual interest throughout the Specific Plan area.

Parking policies encourage minimization of surface parking, placing it away from primary street intersections and facilitating access from side and secondary streets, as well as encouragement of its location behind or below buildings and active frontages (residential and commercial). Service and loading access, utilities, storage, refuse areas, etc. are encouraged to be sited at the rear of buildings or screened with features that discourage the appearance of blank walls. Mechanical equipment is similarly encouraged to be screened through thoughtful siting and landscaping.

BASASP policies focus on incorporation of features that reduce glare from storefront glass; encourage the integration of pedestrian-oriented areas for outdoor dining, shopping and passive recreation or cultural events into developments; encourage enhanced building materials, textures, and detailing at ground level; encourage pedestrian lighting; and encourage accent landscaping to highlight architectural features and support inviting, pedestrian-oriented frontages. Public spaces such as plazas are encouraged in front of residential buildings to provide a transition between public and private spaces, with primary building entries oriented toward public areas connecting to public sidewalk.

Improvements to auto dealership uses include orientation of street walls along street frontages and design of buildings with architectural detailing and articulation to “avoid the appearance of blank walls” or “back of buildings” encourage parking structures for auto storage and placement of that storage/parking behind buildings and screened from the streets.

Specific to landscaping, the BASASP policy notes incorporation of drought-tolerant landscaping and street trees throughout the Specific Plan area and encourages native, drought-tolerant landscape materials consistent with the natural habitat along Rose Creek. Combined with increased pedestrian

amenities throughout the BASASP area, this landscaping would provide another consistent design element as drought tolerant species often share some common leaf shapes and foliage colors.

Finally, the BASASP includes policies related to Rose Creek. Connection of the San Clemente Canyon and Rose Canyon trail networks with the De Anza Regional Bike Path with signage, and sitting areas would provide physical connections with common view elements along the entire western project boundary. Siting of outdoor dining and public spaces to take advantage of Rose Creek, and discouraging parking or blank walls fronting the creek, would take advantage of the creek's presence in a way that does not currently often occur.

An additional unifying feature, "Gateways," are proposed within the BASASP to contribute to community identity. Gateways are suggested for the I-5, railroad, and Morena Boulevard under-crossings; the Grand Avenue/Mission Bay Drive intersection; Balboa Avenue/Mission Bay intersection; and Balboa Avenue near Morena Boulevard. These areas are proposed for consideration of common structural elements, landscaping, lighting, and banners; visually contributing to a unified entry experience into the BASASP area.

Overall, provision of higher density uses near transit and existing community activity areas is consistent with the City of Villages Strategy. All of the BASASP policies and design guidance would create consistent design and structural massing elements throughout the BASASP area, visually uniting a currently more disparate set of uses due to their development over time when numerous different and separate design considerations were in place. Implementation of the BASASP would not adversely impact the existing neighborhood character of the BASASP area as this area is diverse and without overall unifying development elements. Common design principles and goals would unify redevelopment within these areas and have a beneficial effect on neighborhood character.

5.16.5.2 Significance of Impacts

The land use plan, policies, and recommended mobility enhancement of the proposed BASASP, along with implementation of the LDC, would provide for a more unified character than currently exists within this diverse area of the community, while not affecting the more consistent neighborhoods to the north, west, east or south. Project-proposed gateways would provide additional visual landmarks to enhance the overall visual quality and perception of community of the BASASP area. Although development intensity would increase, the project's land use and urban design policies would ensure that implementation of the BASASP would not negatively and substantially alter the character of the neighborhood; less than significant impacts are identified.

5.16.5.3 Mitigation Framework

As impacts would be less than significant, no mitigation is required.

5.16.5.4 Significance After Mitigation

Impacts related to neighborhood character would be less than significant.

5.16.6 Issue 3: Landform Alteration

Would the proposed BASASP result in a substantial change to natural topography or landform?

5.16.6.1 Impacts

Future development implemented under the BASASP would not result in substantial landform alteration. The range of elevational change is less than 130 feet across the BASASP area from the lowest to the highest portion of the BASASP area and future development and redevelopment activities within the BASASP area would occur in already developed areas characterized by generally level topography and absence of natural landforms. No substantial grading or changes to natural landforms would occur. Open space and undeveloped landforms within the BASASP area include the Rose Creek area; no urban development is proposed within Rose Creek.

5.16.6.2 Significance of Impacts

Potential landform alteration impacts would be less than significant because future development implemented under the proposed BASASP would mostly occur within the generally level portion of the BASASP area that is already developed, and such future development activities would not substantially alter existing natural landforms.

5.16.6.3 Mitigation Framework

As impacts would be less than significant, no mitigation is required.

5.16.6.4 Significance After Mitigation

Impacts related to landform alteration would be less than significant.

6.0 CUMULATIVE IMPACTS

6.1 Introduction

Section 15355 of the State CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” These individual effects may entail changes resulting from a single project or from a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the proposed project when added to other past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant projects occurring over a period of time.

Section 15130 of State CEQA Guidelines requires that an EIR discuss the cumulative impacts of a project when the project’s incremental effect would potentially be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects. Where a lead agency determines a project’s incremental effects would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the State CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the State CEQA Guidelines, the discussion of cumulative impacts “...need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” Additionally, one of the following two possible approaches is required for considering cumulative effects:

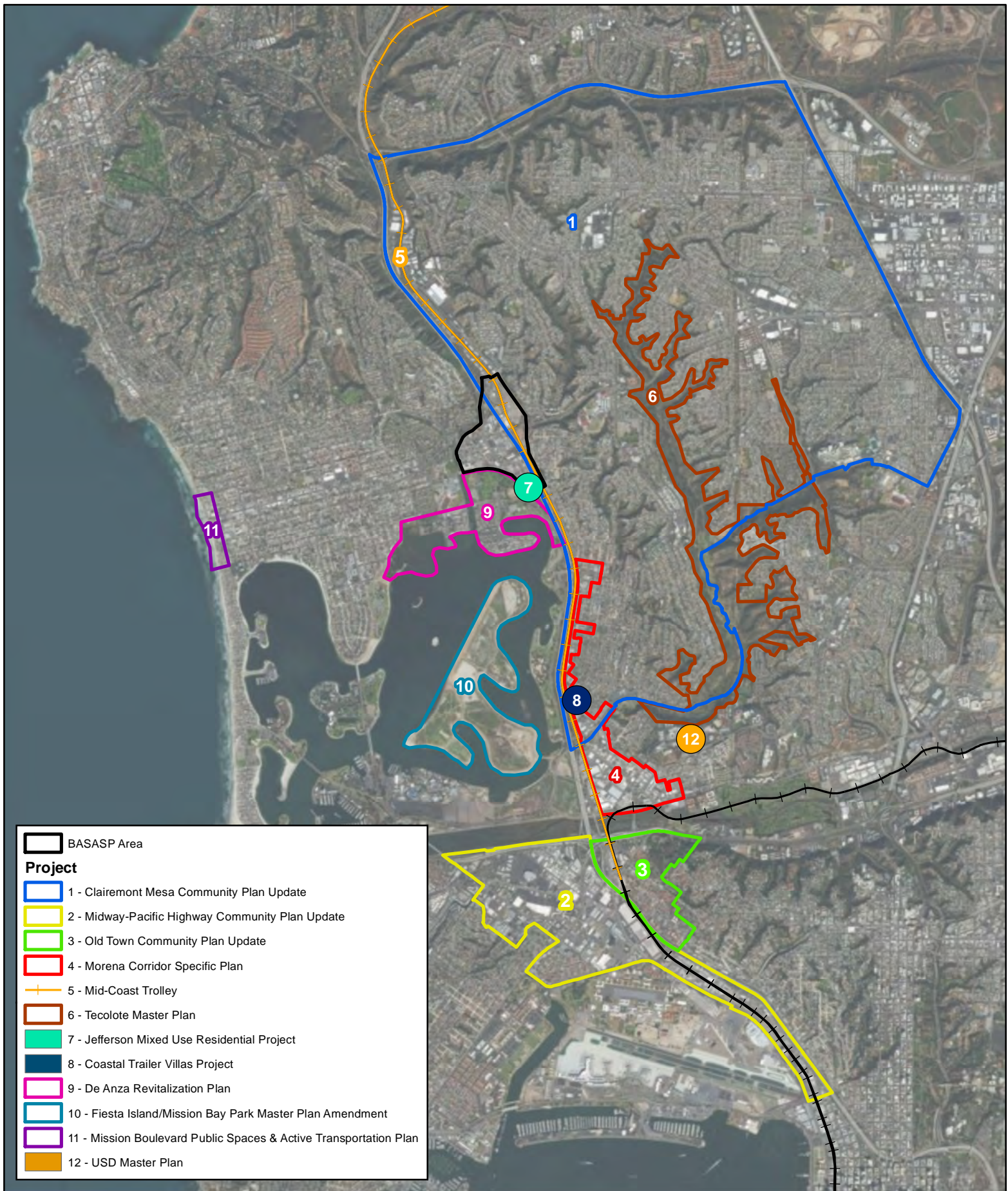
- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the cumulative impact.

The General Plan addresses the entire city, whereas the proposed project focuses on the much smaller 0.33-square mile BASASP area. Although the General Plan assessment as to the probability of significant cumulative impacts introduces each of the specific discussions below, the proposed project’s potential for significant contributions to cumulative effects is based on the specific environmental effects resulting from the proposed project, its location, and other relevant cumulative projects. The City has provided a list of 12 projects to be analyzed as cumulative efforts in conjunction with the proposed project, as identified in Table 6-1, *Cumulative Projects*. The cumulative projects include nine planning projects (three community plan updates, three park plans, one university plan, one active transportation project, and one specific plan), one transit project (Mid-Coast Trolley), one mixed-use residential project, and one solely residential project. One of the projects (the Jefferson Mixed Use Residential Project) would occur within the BASASP boundaries. The other 11 projects are located northeast, east, southeast, south, and west of the BASASP area

within an urban area spanning approximately 36 square miles (approximately six miles both north-south and east-west). Locations of the cumulative projects and their vicinity relative to the BASASP area are shown on Figure 6-1, *General Location of Cumulative Projects*.

**Table 6-1
CUMULATIVE PROJECTS**

Project Name	Type of Development	Project Size	Status
1. Clairemont Mesa Community Plan Update	Update of this 1989 (amended through 2011) planning document for all uses within the community planning area (residential, recreational, industrial, institutional, etc.).	6,755 acres	Ongoing
2. Midway-Pacific Highway Community Plan Update	Update of the 1987 planning document.	1,324 acres	Ongoing. Draft Community Plan Update released in December 2017. Draft PEIR completed in December 2017. Approved 2018
3. Old Town Community Plan Update	Update of the 1991 planning document.	275 acres	Ongoing. Draft Community Plan Update released in November 2017. Draft PEIR completed in January 2018. Approved 2018
4. Morena Corridor Specific Plan	Transit-oriented development and multi-modal mobility improvements with higher density residential and mixed use at Tecolote Station District and Morena Village District.	Approximately 280 acres.	Ongoing. Public review draft of Specific Plan circulated in June 2017. PEIR anticipated in 2018.
5. Mid-Coast Trolley	Extension of the San Diego MTS Blue Line Trolley line.	Just north of the Old Town Transit Center to Gilman Drive within existing railroad right-of-way and alongside I-5.	Approved and under construction with service anticipated to begin in 2021.



Balboa Avenue Station Area Specific Plan

General Location of Cumulative Projects

Figure 6-1



**Table 6-1 (cont.)
CUMULATIVE PROJECTS**

Project Name	Type of Development	Project Size	Status
6. Tecolote Specific Plan	Update adaptive management framework of Natural Resources Management Plan and update Trail Plan. Master Plan Amendment.	950 acres, 16 miles of trails existing or new, 8.5 miles of trail closure.	Ongoing. Public review and advisory committee/planning groups votes completed through 2016. City Council planned for 2018.
7. Jefferson Mixed Use Residential Project	Mixed use development, residential, retail and office.	172 multi-family residential, 7,725 SF of retail, 10,427 SF of office space	Approved. Construction underway as of September 2017, anticipated to take 2.5 years.
8. Coastal Trailer Villas Project	Redevelopment of RV park with 150 multi-family residential units (apartments). CPA, GPA, and rezone.	6 acres with 150 multi-family residential units.	Ongoing. Project presented to Clairemont Mesa Community Planning Group March 2017. EIR in progress. EIR finalized in 2018. City Council planned for 2018.
9. De Anza Cove Amendment to the Mission Bay Park Master Plan Revitalization Plan	3-year program to develop conceptual alternatives leading to a preferred plan, a Mission Bay Park Master Plan amendment, and EIR.	165.5 acres	Ongoing. Started in 2016.
10. Fiesta Island (Mission Bay Park Master Plan Amendment)	Two options under review. Both retain least tern habitat, Over-the-Line sand recreation area, and the Fiesta Island Youth Camp largely unchanged. Improvements include road and formal parking upgrades along Fiesta Island Road to improve runoff quality, and new bike/ pedestrian facilities.	485 acres	Ongoing. CEQA NOP issued spring 2017. Anticipated PEIR certification and Master Plan amendment approval in 2018 2019 by City and California Coastal Commission.

**Table 6-1 (cont.)
CUMULATIVE PROJECTS**

Project Name	Type of Development	Project Size	Status
11. Mission Boulevard Public Spaces and Active Transportation Plan	Mobility report and opportunities and constraints assessment to evaluate and analyze pedestrian, bicycle, transit, and vehicular conditions in the study area. Development of Urban Design and Mobility concepts, with identification of multi-modal streetscape and urban design improvements to enhance pedestrian, bicycle, and transit facilities.	Mission Boulevard to the beach sands, from Diamond Street to Pacific Beach Drive.	Ongoing. Plan completion anticipated in 2019.
12. USD Master Plan Update	14 newly-proposed facility or improvement projects to support construction of academic/administrative buildings, student housing, student services/uses, athletics/athletic support/administrative buildings, physical plant and facilities, parking, pedestrian/multi-modal on-site circulation improvements. MHPA boundary line correction.	180-acre campus. 471,738 SF new building space including 1,003 student beds within approximately 922,230 gross SF (GSF) of new or renovated structures. Parking increase from 5,384 to 6,302 spaces.	Approved 2017

RV = recreational vehicle; CPA = Community Plan Amendment; GPA = General Plan Amendment; SF = square feet; NOP = Notice of Preparation; MHPA = Multi-habitat Planning Area

6.2 Cumulative Analysis Setting

As noted above, the following discussion assesses the proposed project's contributions to cumulative impacts based on the BASASP's location in conjunction with surrounding uses, combined with a review of existing physical conditions and foreseeable changes to those conditions. The existing setting is therefore critical to the analysis as it provides the baseline against which the proposed project's contributions to changed conditions in association with the cumulative projects is evaluated.

The BASASP area encompasses a total of approximately 210 acres (0.33 square miles) and is bounded by Rose Creek on the west, Morena Boulevard on the east, Grand Avenue and Mission Bay Drive on the south, and Avati Drive on the north (refer to Figure 1-2). An escarpment generally rises

to the east, that separates uses in the BASASP area from those on the mesa top, bluffs to the west in the northern area, and an open transition from the BASASP area to Mission Bay, beach communities, and the ocean to the west and southwest. Residential, commercial, light industrial, and regional recreational uses are located within these areas. Summary information is restated here; details as to the existing setting is provided in Chapter 2.0 of this PEIR.

Residential uses are primarily located within the western portion of the BASASP area south of Garnet Avenue and west of Mission Bay Drive. Residences are also located in the southwestern portion of the BASASP area, west of I-5 and along Del Rey Street. Commercial uses within the BASASP area are generally located on the west side of I-5 and include car dealerships, automotive services, restaurants, hotels, and other retail and service businesses. Industrial uses within the BASASP area are generally located along Morena Boulevard and Santa Fe Street on the east side of I-5 and north of Balboa Avenue. Industrial uses include the City's Rose Creek Operations Yard, SDG&E facility, and several warehouses. Rose Creek and an associated trail trend north-south along the western boundary of the BASASP area, with portions that meander into the BASASP area.

Abutting and surrounding uses include open space associated with Rose Canyon/Creek and residential neighborhoods within Pacific Beach to the west; Mission Bay Park, including athletic fields, a municipal golf course, and De Anza Cove Park to the south; primarily residential neighborhoods within Clairemont Mesa to the east; and industrial uses to the north. Institutional uses (schools, churches, and libraries) and recreational facilities (parks and community centers) are interspersed throughout surrounding residential neighborhoods. Beaches and other coastal amenities are located around Mission Bay to the southwest and in Pacific Beach to the west.

Some regional growth is anticipated in the area, as discussed in Sections 5.1 and 5.12, and in Chapter 7.0 of this PEIR. The land uses and the associated potential development designated in the City's General Plan correlates to regional growth estimates made by SANDAG. The proposed project would incrementally increase density and intensity of uses within the BASASP area, however, over the current expectations.

6.3 Assessment of Cumulative Impacts

The following discussion is presented in order of discussion in Chapters 5.0 and 8.0 of this PEIR. General Plan assessment of the potential for cumulative impacts is noted, followed by an assessment of whether or not the proposed project would contribute considerably to significant cumulative impacts for each environmental topic addressed in this PEIR. A summary of the cumulative analysis is provided in Table 6-2, *Summary of Cumulative Impacts*.

**Table 6-2
SUMMARY OF CUMULATIVE IMPACTS**

Environmental Subject	Impact Category	Cumulative Impact	Cumulatively Considerable
Land Use	Consistency with Adopted Plans, Policies, and Regulations	LS	No
	Environmental Plan Consistency	LS	No
	Community Division	LS	No
Air Quality	Regional Air Quality Plan Conformance	SU	Yes
	Air Quality Standards Conformance - Construction Emissions	SU	Yes
	Air Quality Standards Conformance - Operation Emissions	SU	Yes
	Cumulatively Considerable Net Increase of Criteria Pollutants	SU	Yes
	Sensitive Receptors	LS	No
	Odors	LS	No
Biological Resources	Sensitive Species	LSM	No
	Sensitive Habitats	LSM	No
	Wetlands	LS	No
	Wildlife Movement	LS	No
	Conservation Planning	LSM	No
	MHPA Edge Effects	LSM	No
	Conflicts with Local Policies/Ordinances	LSM	No
	Invasive Species	LSM	No
Energy	Energy Consumption	LS	No
Geology and Soils	Geologic Hazards	LS	No
	Erosion and Sedimentation	LS	No
	Geologic Stability	LS	No
Greenhouse Gas Emissions	Direct and Indirect GHG Emissions	LS	No
	Consistency with Adopted Plans, Policies, and Regulations	LS	No
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	Yes
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	Yes
	Tribal Cultural Resources	SU	Yes
Human Health/Public Safety/Hazardous Materials	Health Hazards	LS	No
	Flood Hazards	LS	No
	Emergency Response and Evacuation Plans	LS	No
	Wildfire Hazards	LS	No

Table 6-2 (cont.)
SUMMARY OF CUMULATIVE IMPACTS

Environmental Subject	Impact Category	Cumulative Impact	Cumulatively Considerable
Hydrology, Water Quality, and Drainage	Runoff	LS	No
	Pollutant Discharges	LS	No
	Water Quality	LS	No
Noise	Compatibility of Proposed Land Uses with City Noise Guidelines	LSM	No
	Substantial Noise Increase	LS	No
	Vibration	LSM	No
	Construction Noise	LSM	No
Paleontological Resources	Sensitive Formations	SU	Yes
Population and Housing	Population Displacement	LS	No
	Growth Inducement	LS	No
Public Services	Public Services and Facilities	LS	No
Public Utilities	Water Supply	LS	No
	Utilities	LS	No
	Solid Waste Management	LS	No
Transportation/Circulation	Alternative Transportation Modes	LS	No
	Plans or Policies Supporting Alternative Transportation Modes	LS	No
	Road Segments, Intersections, and Freeway Facilities	SU	Yes
Visual Effects and Neighborhood Character	Public Views	LS	No
	Neighborhood Character	LS	No
	Landform Alteration	LS	No
Agriculture and Forestry Resources	Agriculture	LS	No
	Forestry Resources	LS	No
Mineral Resources	Minerals	LS	No

LS = less than significant

LSM = less than significant with implementation of project-specific mitigation

SU = significant and unavoidable

6.3.1 Land Use

The General Plan PEIR (2008c) concludes that under General Plan development: “incremental adverse physical changes to the environment associated with land use impacts, when viewed in connection with such adverse physical changes associated with land use impacts elsewhere in the county, are considered cumulatively significant and unavoidable.”

6.3.1.1 Consistency with Adopted Plans, Policies, and Regulations

As discussed in Section 5.1, *Land Use*, the proposed BASASP is a comprehensive planning document that provides the policy framework to guide TOD and multi-modal improvements in the vicinity of the Balboa Avenue Station and within the BASASP area. The proposed BASASP contains six major chapters, each providing goals and recommendations related to the creation of a transit-oriented urban village, consistent with the City of Villages strategy outlined in the General Plan. The goals and recommendations expressed in the proposed BASASP are consistent with design guidelines, and

other mobility and civic guidelines stated in the policies of the General Plan and specifically addressed in the Mobility, Urban Design, Economic Prosperity, Recreation, Conservation, and Historic Preservation Elements. Section 5.1 also assesses the proposed BASASP's consistency with the City's CAP, Pacific Beach Community Plan/LCP, Clairemont Mesa Community Plan, Balboa Avenue RAP, LDC regulations (zoning); California Coastal Act, SANDAG's Regional Plan, and the City's MSCP Subarea Plan.

As a result, project-specific potential land use plan consistency impacts associated with the proposed BASASP would be less than significant because the goals, policies, and programs of the proposed BASASP would be consistent with existing applicable local and regional land use plans, policies, and regulations.

Similarly, while the proposed BASASP would contribute to an overall increase in urban density/intensity within the focused BASASP area, associated potential cumulative impacts are addressed through specific design and planning standards to ensure consistency with the cited plans and regulations. Additionally, the increase in focused density in the BASASP area would site uses adjacent to the Balboa Avenue Station, and existing commercial and substantial regional recreational amenities. This conforms to overall City goals for smart growth and would incrementally reduce sprawl within the City. Each of the projects listed on Table 6-1 are consistent with the General Plan. Overall cumulative project consistency is assessed as less than significant. Potential BASASP-related impact contributions related to consistency with adopted plans, policies, and regulations would not add incrementally to a significant cumulative impact and are not cumulatively considerable.

6.3.1.2 Environmental Plan Consistency

As discussed in Section 5.3, *Biological Resources*, the City, USFWS, CDFW, and other local jurisdictions joined together in the late 1990s to develop the MSCP, a program to ensure sensitive habitat and species viability throughout the region, while still permitting some level of continued development. Preserve areas identified under the MSCP are designated as MHPA. Because the MSCP establishes which areas within the region are to be preserved and which can be developed, this program takes into account the cumulative impacts to sensitive upland habitats and MSCP Covered Species.

Two MHPA areas are relevant to the proposed BASASP. As described in Section 5.1.5, the BASASP area would not encroach into sensitive resources in the Rose Creek MHPA. The MHPA does, however, encompass developed land north of Garnet Avenue, where future development under the proposed BASASP is expected to occur. As described in Section 5.1.5.1, limited development is allowed in the MHPA subject to the requirements of the City's MSCP Subarea Plan, and where previously developed land has been included within the MHPA, a Boundary Line Correction can be processed to remove developed and disturbed land from the MHPA.

In this instance, the MHPA area is disturbed/developed at this time, does not contain sensitive resources, and is surrounded by land designated for residential, commercial, and industrial uses. This is exactly the type of situation to which the Boundary Line Correction process was planned to apply. Future development adjacent to the MHPA also would be subject to the MHPA Land Use Adjacency Guidelines to avoid or reduce significant indirect impacts from adjacent uses (see discussion in Section 5.3 of this PEIR).

As a result, potential project-specific environmental plan consistency impacts would be less than significant because planned improvements and future development that could occur under the proposed BASASP would not encroach into sensitive resources in the Rose Creek MHPA and the portion of the MHPA where development could occur is disturbed, does not contain sensitive resources, and is surrounded by adjacent development. A Boundary Line Correction could be processed in the future, as permitted under the City's Biology Guidelines and MSCP, to remove previously developed lands from the MHPA and avoid land use policy impacts. Future development adjacent to the MHPA would be required to comply with the MSCP Land Use Adjacency Guidelines, as part of the Mitigation Framework in the PEIR (see Mitigation Measure BIO-8 in Section 5.3).

Based on the described conditions, the analysis in Section 5.1.5 concludes that potential impacts related to environmental plan consistency from implementation of the proposed BASASP would be less than significant. Similarly, each of the cumulative projects is also bound to comply with environmental plans as applicable (some are located within wholly developed areas such as the Eco-block Mixed Use Residential Project). Environmental restrictions would be applied to each of the projects with potential to affect natural resources, especially the Tecolote Master Plan, De Anza Cove Amendment to the Mission Bay Park Master Plan Revitalization Plan, and Fiesta Island Amendment which include or abut preserve areas. Because the proposed BASASP would provide consistency with applicable MSCP and General Plan requirements through implementation of measures such as an MHPA Boundary Line Correction, and MHPA adjacency standards, potential cumulative land use impacts to environmental plan consistency would be less than significant and would not contribute to a cumulatively considerable impact.

6.3.1.3 Community Division

As described in Section 5.1, the BASASP area is currently comprised of a mix of residential, commercial, industrial, and open space uses that are physically divided by major transportation corridors, including I-5 and the LOSSAN rail line (and soon to be operating Mid-Coast Trolley Line). Major local streets traverse the western portion of the BASASP area, while Morena Boulevard extends along the eastern boundary, and local streets also carry consistent traffic volumes. These transportation facilities bar social, visual, and physical connections, all of which contribute to an existing divided community. Although these existing transportation corridors will remain and continue to divide the community, the BASASP does not propose new or substantially widened roads that would further divide the community. The proposed multi-modal improvements would create new connections and enhance existing connections between the various uses present in the BASASP area that could be accessed without relying on cars. In addition, implementation of the proposed BASASP would reduce community division by improving walkability and bicycle opportunities within the Pacific Beach community and near the Balboa Avenue Station and its related transit improvements.

The siting of mixed uses in proximity to each other, the provision of enhanced pedestrian corridors and bicycle amenities, and the planned changes to the street network would serve to foster community connectivity, which is consistent with policies in the Mobility Element of the General Plan. This village land use strategy would also enhance public gathering places and destinations to foster improved community connectivity and cohesion. Overall, incorporation of the goals and recommendations in the proposed BASASP would enhance community connectivity and would not physically divide an established community. A goal of the Clairemont Mesa Community Plan Update

is to increase community interaction. Tecolote Canyon is a topographic feature that naturally divides the community (but is planned for trail improvements within the canyon) and the other projects listed in Table 6-1 are too small to divide communities. No cumulative effects associated with community division are identified. The potential cumulative impacts to community cohesiveness would be less than significant and not cumulatively considerable.

6.3.2 Air Quality

The General Plan PEIR identifies significant potential cumulative impacts related to air quality, based on existing non-attainment conditions (e.g., for PM₁₀ and PM_{2.5}), as well as additional emissions generation associated with projected development. While the General Plan's analysis notes that conformance with existing related regulatory requirements would generally preclude incremental air quality impacts, additional site-specific mitigation is identified and the analysis concludes that: "...incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Accordingly, the General Plan PEIR concludes that: "...incremental PM₁₀ and PM_{2.5} emissions cannot be precluded, and when viewed in connection with PM₁₀ and PM_{2.5} emissions from construction activities elsewhere in the county, are considered cumulatively significant and unavoidable."

6.3.2.1 Conformance to the Regional Air Quality Strategy

As discussed in Chapter 7.0, *Growth Inducement*, and Section 5.15, *Traffic/Circulation*, related to traffic generation, implementation of the proposed BASASP would bring more residents into the BASASP area than planned under the adopted Community Plans and SANDAG projections. The cumulative area for regional air quality analysis is the SDAB. The RAQS is the most appropriate document for evaluating the proposed BASASP's cumulative effects to air quality because the RAQS evaluated air quality emissions for the whole of the SDAB using a future development scenario. The land uses and related emissions identified in the current RAQS (based on existing land uses and prior land use assumptions) differ from the proposed BASASP's assumptions, which would intensify development in the BASASP area for some uses, and lower the extent of development for other uses. Specifically, within the BASASP area, the proposed BASASP would increase the number of residential units by 287 percent over the adopted Community Plans. At the program level, therefore, it would not conform to the approved RAQS, and a significant plan-to-plan impact was identified in Section 5.2, *Air Quality*.

Mitigation Measure AQ-1 requires that the City shall provide a revised housing and employment forecast to SANDAG to ensure that revisions to the population and employment projections used by the SDAPCD in updating the RAQS and SIP will accurately reflect anticipated growth due to the proposed BASASP. Although the mitigation is identified, and the City can complete their part, it would not be fully implemented until the RAQS are updated. This is completed by other agencies (SANDAG and the SDAPCD) and is beyond the control of the City. Therefore, this impact is identified as significant and unavoidable (unmitigated) at the program level. The direct and cumulative impacts similarly would remain significant and unavoidable.

Cumulatively, however, and as described in Section 5.2.4.1, if a project is planned in a way that results in the minimization of VMT both within the project planning area and the community plan area in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the RAQS. The proposed BASASP would be consistent with the goals

of the RAQS to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The proposed BASASP supports the multi-modal strategy of the SANDAG RP through improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Station. Policies contained within the proposed BASASP Land Use and Mobility chapters would serve to promote transit use as well as other forms of mobility, including walking and bicycling. Furthermore, the proposed project's access to transit also results in the BASASP area being located within a designated TPA consistent with SB 743. This type of development is consistent with the goals of the RAQS for reducing emissions associated with new development.

Taking a very conservative approach, however, although the proposed project could be expected to lower VMT within the City overall, it would be raised within the BASASP area. Since the responsibility for updating the RAQS is within the jurisdiction of another agency, the proposed BASASP's contribution to cumulative RAQS non-conformance is therefore assessed as significant and cumulatively considerable based on the inability of the City to ensure the RAQS update.

6.3.2.2 Conformance to Federal and State Ambient Air Quality Standards

As described in Section 5.2, the SDAB is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5} under State standards and a nonattainment area for O₃ under federal standards. As noted in Section 5.2.5.1, future development pursuant to the proposed BASASP would generate criteria air pollutants in the short term during construction activities and in the long term during operational activities.

Construction activities would result in emissions of fugitive dust from demolition and site grading activities, heavy construction equipment exhaust, and vehicle trips associated with workers commuting to and from the construction site and from trucks hauling materials. The exact number and timing of individual development projects that would occur as a result of implementation of the proposed BASASP are unknown at this time; therefore, project-level emissions estimates cannot be determined at the program level. Subsequent development projects would need to analyze specific construction-related criteria air pollutant impacts to ensure that emissions remain below SDAPCD thresholds. Because of the likely potential of individual projects to exceed SDAPCD screening thresholds, implementation of the proposed BASASP would result in potentially significant impacts related to construction emissions.

Operational source emissions would originate from traffic generated within or as a result of future development pursuant to the proposed BASASP. Area source emissions would result from activities such as the use of fireplaces and consumer products. In addition, landscape maintenance activities associated with the proposed land uses would produce pollutant emissions.

Similar to the construction discussion, the proposed BASASP's operational regional VOC (an O₃ precursor), CO, PM₁₀, and PM_{2.5} emissions would exceed the SDAPCD's Screening Level Thresholds. Because it cannot be demonstrated at the programmatic level that future development would not exceed applicable air quality standards, impacts are considered cumulatively considerable and significant.

Mitigation Measures AQ-2 through AQ-4 would reduce criteria pollutant emissions. No additional mitigation is available. Mitigation Measure AQ-2 would require appropriate modeling to identify specific construction emissions levels, and Mitigation Measure AQ-3 would require use (as

appropriate) of best available control measures/technology to reduce construction emissions to the extent feasible (e.g., minimizing simultaneous operation of multiple pieces of construction equipment; using more efficient or low pollutant-emitting equipment; using alternative fueled construction equipment; incorporating dust control measures such as watering, soil stabilizers, and speed limits), and/or minimizing idling time by construction vehicles. Mitigation Measure AQ-4 addresses operations and would require analysis based on the latest available CalEEMod model, or other analytical method, and incorporation of mitigation to reduce impacts, such as: installation of electric vehicle charging stations, improvement of walkability design and pedestrian network, increasing transit accessibility and frequency by incorporating Bus Rapid Transit (BRT) routes included in the SANDAG RP, and limiting parking supply and unbundling parking costs.

Although each of the projects listed in Table 6-1 would similarly be required to address cumulative emissions, the ability of future development under the proposed BASASP to successfully implement these mitigation measures cannot be guaranteed at this time. Thus, air pollutant impacts from construction and operation under the proposed BASASP and in conjunction with past, present, and reasonably foreseeable future plans and projects are considered significant and cumulatively considerable.

6.3.2.3 Cumulatively Considerable Net Increase of Criteria Pollutants

The cumulative area for regional air quality analysis is the SDAB. The SDAB is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5} under State standards and a nonattainment area for O₃ under federal standards. This results in a significant cumulative condition regardless of additions from projects listed in Table 6-1.

As discussed in Section 6.3.2.2, the proposed BASASP's operational regional VOC (an O₃ precursor), PM₁₀, and PM_{2.5} emissions would exceed the SDAPCD's Screening Level Thresholds. These emissions could contribute to existing violations of the State and federal O₃ standards; as well as PM₁₀ and PM_{2.5} standards. Because it cannot be demonstrated at the programmatic level that future development would not exceed applicable air quality standards, impacts are considered cumulatively considerable and significant.

It is noted that the proposed BASASP is intended to further express General Plan policies in the BASASP area through the provision of site-specific recommendations that implement City-wide goals and policies, address community needs, and guide zoning. Although Mitigation Measures AQ-2 through AQ-4 would reduce criteria pollutant emissions, the contribution of air pollutants to the SDAB is assessed as considerable and would result in a significant and unavoidable cumulative impact to air quality within the SDAB.

6.3.2.4 Impacts to Sensitive Receptors

As stated in Section 5.2.7.2, the BASASP would not exceed the CO standard, therefore, exposure of sensitive receptors to traffic-related CO hot spots would be less than significant. Cumulatively, even in conjunction with the projects listed in Table 6-1, CO hotspot effects are also assessed as less than significant. CO hotspots are localized effects that would not be expected to compound with other projects.

There is also potential for exposure of sensitive land uses to TACs associated with stationary sources, and construction and operational activities. BASASP-direct impacts are assessed as less than significant based on consistency with the goals of the CARB handbook, which provides guidance on land use compatibility with sources of TACs (CARB 2005). Cumulatively, impacts associated with TACs would be localized in their effect and are not expected to extend beyond the immediate area. The combination of potential effects from the 12 cumulative projects is not expected to be substantial, as the potential TAC-effects attributable to those projects would also be localized. In addition, the placement of additional residential and commercial uses in an existing developed location and in proximity to the Balboa Avenue Station is expected to divert some traffic congestion in other parts of the City to the BASASP area. Significant contributions to cumulatively considerable net increases of TACs are therefore not expected to occur, and BASASP-related cumulative impacts would be less than significant.

6.3.2.5 Odor Impacts

Potential impacts related to odors from implementation of the proposed BASASP are identified as less than significant in Section 5.2.8 of this PEIR, based on the following considerations: (1) there are no known sources of long-term odors in the BASASP area; (2) there are no agricultural operations in the BASASP area which could potentially generate odors; and (3) development under the proposed BASASP is not expected to result in land uses that would produce objectionable odors. A less than significant determination would also pertain to the projects in Table 6-1 as these projects do not propose water reclamation facilities, other industrial uses, smoke-houses, crematoriums, etc. Significant cumulative odor impacts are not anticipated. Similarly, based on the described conclusions, contributions to cumulative impacts related to odor generation from implementation of the proposed BASASP are considered less than significant and not cumulatively considerable.

6.3.3 Biological Resources

The General Plan PEIR identifies significant potential cumulative impacts to biological resources, because future development could occur on or adjacent to undeveloped land and result in impacts to biological resources including native habitat, wetlands, wildlife movement, and sensitive species. While the General Plan PEIR analysis states that conformance with existing related regulatory requirements would generally preclude incremental impacts to biological resources, additional site-specific mitigation is identified, and the analysis notes that "...incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Accordingly, the General Plan PEIR concludes that: "...incremental biological resources impacts cannot be precluded, and when viewed in connection with regional impacts to unprotected species, habitats, and other resources, are considered cumulatively significant and unavoidable."

As discussed in Section 5.3.2 of this PEIR and in Section 6.3.1.2, above, the MSCP is a program to ensure sensitive habitat and species viability throughout the region, while still permitting some level of continued development. The City's MSCP Subarea Plan (City 1997a) was prepared pursuant to the outline developed by the USFWS and CDFW to meet the requirements of the State Natural Communities Conservation Planning (NCCP) Act of 1992. Adopted by the City in March 1997, the Subarea Plan forms the basis for the MSCP Implementing Agreement which is the contract between the City, USFWS, and CDFW. Because the MSCP establishes which areas within the region are to be preserved (MHPA) and which can be developed, this program takes into account the cumulative

impacts to sensitive upland habitats and MSCP Covered Species. The wetland and riparian habitats within the BASASP area are all covered vegetation communities under the City's MSCP Subarea Plan.

6.3.3.1 Sensitive Species

As outlined in Section 5.3.4 of this PEIR, potential impacts to birds covered by the MBTA would be avoided by adherence to the requirements of this law. As a result, cumulative impacts also would be avoided, and impacts would be less than significant.

Implementation of the proposed BASASP, however, has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by placing development adjacent to sensitive habitat, as identified on Tables 5.3.3 and 5.3.4. San Diego sagewort, southwestern spiny rush, least Bell's vireo and yellow warbler were observed during project surveys. Potential impacts to these, as well as additional federal- or State-listed species, MSCP Covered Species, Narrow Endemic species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List are considered to be significant.

The Implementing Agreement noted above ensures implementation of the Subarea Plan and allows the City to issue "take" permits under the federal and State Endangered Species Acts to address impacts at the local level.

Although implementation of the proposed BASASP has the potential to result in significant direct and indirect impacts on sensitive plant and animal species, these impacts would be mitigated at the project level through implementation of Mitigation Measures BIO-1 through BIO-5. In summary, Mitigation Measure BIO-1 requires site-specific and seasonally appropriate environmental review, analysis of potential impacts on biological resources, avoidance as a first response as feasible, preparation of City and Wildlife Agency-approved restoration plans as appropriate, and/or salvage and relocation as appropriate. Mitigation Measures BIO-2 and BIO-3 require habitat assessments for Ridgway's Rail and least Bell's vireo (respectively), protocol surveys as appropriate, and additional mitigation for indirect impacts in association with the City's Biology Guidelines and MSCP Subarea Plan. Mitigation Measure BIO-4 addresses overall avian nesting impacts and requires seasonal restrictions, pre-grading surveys, noise controls and abatement, etc. as appropriate. Mitigation Measure BIO-5 requires site-specific surveys to identify other sensitive or MSCP Covered Species for each future project, with impacts generally to be mitigated through the City's Biology Guidelines. These measures would reduce BASASP-related project level impacts to a less than significant level. The mitigation to a less than significant level combined with the fact that the habitats (and associated sensitive species) are addressed in the regional MSCP/MHPA designed to address cumulative effects (see also Section 6.3.3.2) result in BASASP-related cumulative impact contributions also being less than significant and not cumulatively considerable. Other projects in Table 6-1 would also be required to mitigate for site-specific sensitive species impacts as appropriate and would be covered by the MSCP/MHPA for regional cumulative effects.

6.3.3.2 Sensitive Habitats

The analysis of sensitive upland habitats in Section 5.3.5 of this PEIR concludes that potential impacts from implementation of the proposed BASASP would be significant, based on assumed effects to areas containing Diegan coastal sage scrub and non-native grassland communities (Tier II and IIIB habitats). These impacts would be mitigated to a less than significant level at the project

level through implementation of Mitigation Measure BIO-6, which requires mitigation through habitat acquisition/preservation, restoration, and/or creation in accordance with mitigation ratios specified in the City's Biology Guidelines. Wetlands would be avoided, but in order to be conservative and account for potential (currently unforeseen) future conditions, Mitigation Measure BIO-7 is also provided. Mitigation Measure BIO-7 requires avoidance as a first response, and where avoidance is infeasible, mitigation to achieve no net loss of wetland function and value. Typical mitigation ratios for wetlands are also specified in the City's Biology Guidelines. The cited mitigation ratios for these impacts are identified in Table 5.3-7 and 5.3-8 of this PEIR. This would result in less than significant impacts on a project level.

This project-level mitigation, in combination with the City's implementation of the MSCP, would also result in less than significant cumulative and not cumulatively considerable BASASP-related impacts to sensitive habitats. Other projects in Table 6-1 would also be required to mitigate for site-specific sensitive species impacts as appropriate and would be covered by the MSCP/MHPA for regional cumulative effects.

6.3.3.3 Wetlands

Although five vegetation communities contain potential jurisdictional waters or wetlands, as stated in Section 5.3.6, no BASASP-related impacts to wetlands are anticipated because areas containing potential jurisdictional waters would be avoided.

This avoidance also would be expected to result in no, or certainly less than significant, cumulative impacts. In the interests of being conservative, however, the City is also requiring Mitigation Measures BIO-7 and BIO-8, requiring avoidance as a first measure; wetlands habitat mitigation through a combination of habitat acquisition/preservation, restoration, and/or creation using typical mitigation ratios, as defined in the City's Biology Guidelines and shown on Table 5.3-8 of this PEIR; and mitigation for impacts to other jurisdictional waters to be applied by federal and state regulators via their applicable consulting/permitting process. This would potentially include on-site protection, enhancement, creation, and/or restoration at a minimum 1:1 ratio (or higher) and typically to be accomplished in proximity to the impacts (and usually within the same watershed). These mitigation measures would lower potential project impacts to a less than significant level.

Construction of future development projects under the proposed BASASP would occur in compliance with the mandatory no-net-loss requirements for wetland/riparian habitats. Where avoidance is not feasible, wetlands would be mitigated at a minimum 2:1 ratio. Because of the 2:1 ratio, existing wetland/riparian habitats would be enhanced to a higher quality and would provide an increased benefit to the MHPA and its conservation. Because impacts would be mitigated as a higher ratio than the impact, the reduction in impacts combined with the City's implementation of the MSCP also would result in less than significant cumulative impacts on wetlands from the proposed BASASP. Other nearby plans and projects are either actively designed to improve preserve areas (i.e., the Tecolote Canyon Specific Plan) and/or would be subject to similar mitigation ratios. Thus, the proposed BASASP would not substantially contribute to significant cumulative impacts to biological resources due to the implementation of the MSCP and conformance with "no net loss" requirements for wetland/riparian habitats (i.e., contributions would be less than cumulatively considerable).

6.3.3.4 Wildlife Movement

As noted in Section 5.3.7, Rose Creek serves as a potential wildlife movement corridor within the BASASP area, and the railway corridor (although heavily disturbed) may also act as an occasional corridor. The BASASP does not propose any changes to the rail corridor. It also proposes to designate the portion of Rose Creek within the BASASP area as Open Space (with no development occurring within the Rose Creek corridor). Therefore, no impacts to wildlife movement are anticipated. The absence of wildlife movement impacts at a program level would result in no potential contribution to cumulative impacts. The cumulative projects listed in Table 6-1 are generally wholly removed from potential wildlife movement corridors as they are surrounded by wholly developed areas (see Figure 6-1). The De Anza Revitalization Plan contains Rose Creek, which is a wildlife movement corridor, and would be retained and protected by that project. The trail improvements proposed under the Tecolote Master Plan would not impact wildlife movement as much of the canyon would be retained as natural open space (and wildlife often use improved trails as movement corridors). Cumulative impacts to wildlife movement are less than significant and the BASASP would not contribute to a cumulative impact.

6.3.3.5 Conservation Planning

The analysis in Section 5.3.8 of this PEIR concludes that implementation of future projects under the proposed BASASP generally would be consistent with the currently designated MHPA preserve areas. By avoiding impacts to Rose Creek, impacts to the MHPA would also be avoided, unless impacts occur to those previously developed areas within the MHPA. MHPA in the southwestern portion of the BASASP area includes developed land north of Garnet Avenue, where development is expected to occur within the BASASP area. A MHPA Boundary Line Correction in close coordination with the City as well as state and federal wildlife agencies would allow project activities associated with future specific projects under the proposed BASASP to occur within areas of the MHPA that are developed (see also discussion in Section 6.3.1.2, above). Therefore, project impacts related to MHPA consistency would be less than significant.

The analysis in Section 5.3.8 of this PEIR concludes that implementation of the proposed BASASP could introduce new land uses adjacent to the MHPA and that future development proposals could result in potentially significant indirect impacts to adjacent MHPA lands. Future discretionary development projects under proposed BASASP are required to comply with the MSCP Subarea Plan Section 1.4.3 Land Use Adjacency Guidelines. Required measures include: barriers/permanent fencing where development is adjacent to the MHPA, with signs as appropriate; use of structural and nonstructural BMPs, including sediment catchment devices during construction, and appropriate direction of drainage; direction of outdoor lighting adjacent to the MHPA away from the MHPA or shielded to prevent light over-spill; restrictions on invasive non-native plant species and use of native species; approval and maintenance of brush management areas; restricted access to the MHPA; controls on toxics/products potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality; and minimization of noise impacts through berms or walls adjacent to uses that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Noise must also be controlled during the breeding season of sensitive species, as well as during the rest of the year.

As noted above, some of the cumulative projects in Table 6-1 do not require conservation planning per se as they are within wholly developed areas. Alternatively, the parks and Tecolote Canyon plans specifically address these issues. Adherence to the guidelines ~~The identified measures~~ would lower project-specific impacts to a less than significant level for each of the projects, and potential cumulative impacts related to conservation planning from implementation of the proposed BASASP would also be less than significant and not cumulatively considerable.

6.3.3.6 MHPA Edge Effects

Many of the cumulative projects in Table 6-1 do not require consideration of MHPA edge effects as they are not located adjacent to MHPA. ~~The De Anza Revitalization Plan and the Tecolote Specific Plan, however, contain MHPA within their boundaries (refer to Figure 5.3-2 of this PEIR).~~ There are MHPA lands within the BASASP (refer to Figure 5.3-2 of this PEIR). The BASASP portion of the MHPA is surrounded by land designated for residential and commercial uses. Future BASASP-related development adjacent to the MHPA could adversely impact adjacent MHPA from edge effects related to drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development that could degrade habitat or alter animal behavior within the preserve, which could be significant. Adherence to the MHPA Land Use Adjacency Guidelines ~~Implementation of Mitigation Measure BIO-8~~ would reduce those impacts to below a level of significance at the project level. Because edge effects would be directly addressed through the MHPA Land Use Adjacency Guidelines, potential cumulative impacts related to MHPA edge effects from implementation of the proposed BASASP would be less than significant and not cumulatively considerable.

6.3.3.7 Conflicts with Local Policies/Ordinances

As stated in Section 5.3.10 of this PEIR, the City's ESL Regulations require avoidance, to the maximum extent practical, of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemic species. The regulations also state that wetland impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable.

Because future development proposed in accordance with the BASASP would be required to comply with all applicable ESL Regulations ~~on a project-specific basis (implemented as mitigation measures, as appropriate)~~, no conflicts with those regulations would occur. Past, present, and reasonably foreseeable projects building out within the cumulative study area would also be required to conform to the same regulations. Based on the described considerations, ~~including implementation of appropriate mitigation measures, as noted~~, potential cumulative impacts related to conflicts with local policies and ordinances would be less than significant and BASASP-related contributions would also be less than significant and not cumulatively considerable.

6.3.3.8 Introduction of Invasive Species

Section 5.3.11 of this PEIR concludes that future development projects within or adjacent to the MHPA or Rose Creek have the potential to introduce invasive species through the use of exotic/invasive plant species in landscaping, which is considered significant on a project level.

The introduction of invasive species would be addressed in accordance with the requirements of the MHPA Land Use Adjacency Guidelines, ~~as well as implementation of Mitigation Measure BIO-9, which specifically states, “No invasive non-native plant species shall be introduced into areas adjacent to the MHPA (i.e., landscape plans for projects shall contain no exotic plant/invasive species and shall include an appropriate mix of native species which shall be used adjacent to the MHPA),” as well as appropriate use of natives.~~ By meeting the requirements of the MHPA Land Use Adjacency Guidelines, and using native, non-exotic non-invasive plant species in landscaping pursuant to Mitigation Measure BIO-9, impacts from the introduction of invasive species associated with future BASASP development would be less than significant.

As appropriate, other projects building out with potential invasive species impacts would be required to conform to the MHPA Land Use Adjacency Guidelines (some projects are not located adjacent to any natural habitats). Based on these considerations, potential cumulative impacts related to the introduction of invasive species relative to the projects in Table 6-1 are assessed as less than significant and contributions from implementation of the proposed BASASP would be less than significant and not cumulatively considerable.

6.3.4 Energy

While the General Plan PEIR notes that compliance with applicable regulations and policies “... would preclude incremental impacts associated with new construction of, or improvements to, public utilities infrastructure...”, the analysis concludes that: “...incremental impacts associated with potentially excessive energy consumption and the construction of future public utilities infrastructure improvements, when viewed in connection with the increased regional demand for energy and such improvements, may be considered cumulatively significant and unavoidable.”

6.3.4.1 Use of Excessive Amounts of Electricity or Fuel and Other Forms of Energy

The analysis in Section 5.4, *Energy Conservation*, concludes that program-level energy-related impacts from implementation of the proposed BASASP would be less than significant. This is based on two considerations. First, implementation would not result in use of excessive amounts of fuel or other forms of energy during the construction of future projects under the proposed BASASP, resulting in short-term energy impacts being less than significant. Second, energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies included in the proposed BASASP would avoid excessive energy consumption from operations associated with future development pursuant to the proposed BASASP; resulting in long-term operational energy impacts being less than significant.

Similar levels of review and requirements are anticipated for the cumulative development projects listed in Table 6-1. Based on the provisions of the proposed BASASP and the energy conservation measures mandated by local, state, and federal laws, the cumulative impacts of the proposed BASASP on energy are considered less than significant and not cumulatively considerable.

6.3.5 Geology and Soils

The General Plan PEIR identifies a number of potentially significant cumulative impacts associated with projected population growth and related exposure of people to geologic hazards; including seismic ground shaking, liquefaction and related effects, and landslides.

6.3.5.1 Geologic Hazards

As stated in Section 5.5.4.1, potential impacts associated with landslides/mudslides, as well as tsunamis/seiches, are considered less than significant due to the proposed BASASP's location and the lack of known issues associated with these categories of effects. The BASASP area is relatively flat and is not located in proximity to water features capable of generating substantial seiche-related hazards. Potential impacts related to geologic hazards such as fault rupture, ground shaking, liquefaction, ground lurching, and settlement associated with implementation of the proposed BASASP would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the IBC/CBC, the Municipal Code, and other pertinent requirements as outlined in Section 5.5.-2.

Other developments would similarly be subject to these mandatory industry standards and regulations. Based on these factors, contributions from the cumulative projects in Table 6-1 to potential cumulative impacts associated with geologic hazards would be less than significant and implementation of the proposed BASASP would not result in cumulatively considerable contributions.

6.3.5.2 Erosion and Sedimentation

As stated in Section 5.5.5, potential impacts related to erosion and sedimentation from implementation of the proposed BASASP would be avoided or reduced below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes, including applicable requirements under the City Storm Water Program and NPDES as outlined in Section 5.5.2 (see discussion below in Section 6.3.9).

Other developments would similarly be subject to these mandatory industry standards and regulations. Based on these requirements, contributions from the cumulative projects in Table 6-1 to potential cumulative impacts associated with erosion and sedimentation would be less than significant. Because of these mandatory requirements, and the fact that the proposed BASASP is consistent with related elements of the General Plan, the proposed BASASP's potential contributions to cumulative impacts associated with erosion and sedimentation would be less than significant and not cumulatively considerable.

6.3.5.3 Geologic Stability

As stated in Section 5.5.6, potential impacts related to geologic instability (associated with subsidence, collapse, expansive soils, slope stability, and shallow groundwater) during implementation of the proposed BASASP would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standard and codes, including the IBC/CBC and pertinent City criteria.

Other developments would similarly be subject to these mandatory industry standards and regulations. Based on these requirements, contributions from the cumulative projects in Table 6-1 to potential cumulative impacts associated with geological stability would be less than significant. Because of these mandatory requirements, contributions to potential cumulative impacts related to geologic stability during development of the proposed BASASP would be less than significant and not cumulatively considerable.

6.3.6 Greenhouse Gas Emissions

The General Plan PEIR identifies significant potential cumulative impacts related to GHG emissions, based on projected population growth and the associated increase of GHG emissions. While the General Plan PEIR analysis notes that conformance with existing related General Plan goals and policies, including the associated draft GHG Action Plan, would generally avoid or reduce GHG impacts, the analysis concludes that: "...incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Accordingly, the General Plan PEIR concludes that: "...the cumulatively considerable incremental contributions to the worldwide increase in GHG emissions represented by development that is anticipated to occur with implementation of the Draft General Plan is considered significant and unavoidable."

6.3.6.1 Direct and Indirect Emissions of Greenhouse Gases

GHG emissions are by definition cumulative in nature. As a result, Section 5.6, *Greenhouse Gas Emissions*, provides a detailed review of cumulative effects associated with the proposed BASASP. The remainder of this discussion summarizes salient conclusions.

As described in Section 5.6.1.2 of this PEIR, GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), each of which can be emitted during construction and operation of a project. Although water vapor is the most abundant and variable GHG in the atmosphere, it is not considered a pollutant; it maintains a climate necessary for life. As stated in Section 5.6.4.1, buildout land use quantities were modeled to estimate future BASASP area GHG emissions for buildout (year 2035) under both the adopted Community Plans (i.e., Pacific Beach and Clairemont Mesa Community Plans) and the proposed BASASP. Projected buildout totals took into account several existing land uses that would remain and not be redeveloped, as well as anticipated new/redeveloped land uses. As explained in Section 5.6.4.1 and demonstrated on Table 5.6-7, proposed BASASP-related emissions would result in approximately 28,627 MT CO₂e per year more than buildout under the adopted Community Plans. This increase in GHG emissions however is a direct result of the implementation of the City's CAP Strategies and the General Plan's City of Villages strategy. Increasing residential and commercial density in transit corridors and Community Villages within a TPA would support the City in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions were assessed as less than significant.

6.3.6.2 Consistency with Adopted Plans, Policies, and Regulations for the Purpose of Reducing GHG Emissions

The analysis in Section 5.6.5.1 addresses consistency of the proposed BASASP with relevant state, regional, and local plans, including the City's CAP. The section concludes that potential impacts from

implementation of the proposed BASASP related to conformance with State and regional plans and policies, as well as overall consistency with General Plan GHG goals and policies (as detailed in Section 5.6.5.1), would be less than significant.

GHG issues are cumulative by nature. Based on the described considerations, and mandatory City policies related to CAP compliance, potential cumulative projects' impacts related to consistency with adopted GHG plans, policies, and regulations are also likely to be less than significant. The proposed BASASP's contributions are identified as less than significant and not cumulatively considerable.

6.3.7 Historical and Tribal Cultural Resources

The General Plan PEIR identifies significant potential cumulative impacts to tribal cultural/historical resources, based on potential grading, excavation, and/or demolition associated with projected future development, as well as the fact that "Archaeological resources and prehistoric human remains may be difficult to detect prior to construction activities, as they are generally located below the ground surface." While the General Plan PEIR analysis states that conformance with existing related regulatory requirements would generally preclude incremental impacts to historical/archaeological resources and human remains, additional site-specific mitigation is identified and the analysis notes that "...incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Accordingly, the General Plan PEIR concludes that: "...incremental impacts related to historical and archaeological resources and prehistoric human remains, when viewed in connection with historical resources impacts elsewhere in the county, are considered cumulatively significant and unavoidable."

6.3.7.1 Historic Buildings, Structures, Objects, or Sites

Development throughout the City, including in the BASASP area, has resulted in the loss of historical resources. This constitutes a significant cumulative regional loss. Environmental legislation, however, has diminished the likelihood that discovered resources would be destroyed without contact with appropriate Native American descendants and/or data recovery, as appropriate.

As outlined in Section 5.7, *Historical and Tribal Cultural Resources*, given the presence of known and potential historical and archeological resources within the community, future development pursuant to the proposed BASASP could have a significant impact on important historic resources, including, but not limited to, Trade Winds Motel Sign or Chase Bank building. Mitigation to lower potential impacts are identified in Section 5.7.4.3 (HIST-1). Mitigation Measure HIST-1 requires redesign as a preferred action, followed by such actions as a HABS/HAER survey, preparation of a historic resource management plan, design of new construction compatible with the historic resource, repair damage to the Secretary of the Interior's standards for Rehabilitation, screen for incompatible new development, noise protection for historic properties, and removal of industrial pollution. Implementation of actions pursuant to Mitigation Measure HIST-1 would reduce impacts to historic buildings, structures, and objects. The ability of this measure to adequately protect significant historic structures, however, cannot be assured at the program level. Program-level impacts are therefore identified as significant and unavoidable.

Cumulatively, the list of projects in Table 6-1 does not include the removal of historic resources, and the proposed BASASP's list of historic resources is short, consisting of one marker that is outside the impact area, a motel sign, and the potential (but currently unsure) eligibility of the Chase Bank building, which will reach 50 years of age in the near future. Because the discussion in Section 5.7.4.4 concludes that the ability of Mitigation Measure HIST-1 to adequately protect significant historic structures cannot be assured at the program level, the proposed BASASP's contributions to cumulative impacts on historical resources are also conservatively assessed as significant. No specific mitigation is possible at this time, and these potential future impacts remain significant and cumulatively considerable.

6.3.7.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

As outlined in Section 5.7, *Historical and Tribal Cultural Resources*, given the presence of known and potential historical and archeological resources within the community, future development under the proposed BASASP has the potential to result in significant impacts to prehistoric or historic archaeological resources, sacred sites, and human remains, including, but not limited to, areas within and/or in proximity to the village of La Rinconada de Jamo. Mitigation to lower potential impacts are identified in Section 5.7.4.3 (HIST-2). Mitigation Measure HIST-2 requires a series of actions prior to issuance of any permit for future development that could directly affect an archaeological or tribal cultural resource. These actions require: determination of resource presence; and if a resource is present, preparation of a historic evaluation (including background research and field review); initiation of consultation with identified tribes and implementation of a testing program resulting in redesign or data recovery (with avoidance being the first action); and preparation of archaeological resource management reports, and curation of data/collections as appropriate. Implementation of actions pursuant to Mitigation Measure HIST-2 and compliance with CEQA and PRC Section 21080.3.1 requiring tribal consultation, would reduce impacts to archaeological resources. The ability of this measure to adequately protect significant archaeological resources, however, cannot be assured at the program level. Program-level impacts are, therefore, identified as significant and unavoidable.

Cumulatively, these actions are standard mitigation measures for City projects with potential for impacts to archaeological resources and would address issues associated with cumulative development projects in Table 6-1. Because the discussion in Section 5.7.5.3 concludes that the ability of Mitigation Measure HIST-2 to adequately protect significant archaeological resources cannot be assured at the program level, the proposed BASASP's contributions to cumulative impacts on archaeological resources are also conservatively assessed as significant. No specific mitigation is possible at this time, and these potential future impacts remain significant and cumulatively considerable.

6.3.7.3 Tribal Cultural Resources

No recorded religious or sacred resources are known to occur within the BASASP area; however, given the presence of known and potential tribal cultural resources within and immediately adjacent to the BASASP, future development pursuant to the proposed BASASP could potentially result in a significant impact on tribal cultural resources. As stated in Section 5.7.6.3, implementation of actions pursuant to Mitigation Measure HIST-2 and compliance with CEQA and PRC Section 21080.3.1

requiring tribal consultation, would reduce impacts to religious or sacred uses and tribal cultural resources. The ability of this measure to adequately protect significant tribal cultural resources, however, cannot be assured at the program level. Program-level impacts are therefore identified as significant and unavoidable.

Cumulatively, these actions are standard mitigation measures for City projects with potential for cultural impacts, and would address issues associated with cumulative development projects in Table 6-1. ~~The proposed BASASP's contributions to cumulative impacts on religious and sacred resources or tribal cultural impacts also would be less than significant and not cumulatively considerable.~~ Because the discussion in Section 5.7.6.3 concludes that the ability of Mitigation Measure HIST-2 to adequately protect significant tribal cultural resources cannot be assured at the program level, the proposed BASASP's contributions to cumulative impacts on tribal cultural resources are also conservatively assessed as significant. No specific mitigation is possible at this time, and these potential future impacts remain significant and cumulatively considerable.

6.3.8 Human Health/Public Safety/Hazardous Materials

The General Plan PEIR analysis concludes that cumulative impacts to hazardous materials would be less than significant based on compliance with existing local, state, and federal regulations. Potential impacts for tsunami and seiche hazards are concluded to generally be less than significant for similar reasons, related to regulations, development code, and emergency management plans, as well as the fact that "The continual review and updating of these documents and regulations would further reduce potential cumulative impacts." For floodplain-related hazards, the General Plan PEIR concludes that conformance with existing related regulatory requirements generally would also preclude exposure to floodplain-related hazards. Nonetheless, additional site-specific mitigation is identified, and the analysis concludes that: "incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Potential cumulative effects to emergency response and evacuation plans were identified in association with projected population growth. The General Plan PEIR concludes, however, that such impacts would be less than significant based on required conformance with associated existing local, state, and federal regulations. Finally, although conformance with existing related regulatory requirements, along with site-specific mitigation, is generally anticipated to address wildfire hazards, the General Plan PEIR identifies significant potential cumulative impacts associated with wildfire hazards, based on projected increase in population and exposure of people to wildfire hazard areas. Impacts could remain significant and unavoidable, however, where no feasible mitigation exists. Accordingly, the General Plan PEIR concludes that wildfire hazards are regionally considered cumulatively significant and unavoidable.

6.3.8.1 Health Hazards

As stated in Section 5.8.4 of this PEIR, potential impacts related to hazardous materials and associated health hazards from implementation of the proposed BASASP would be avoided through mandatory conformance with applicable regulatory/industry standards and codes, including approval from the County DEH/HMD and other pertinent requirements as outlined in Section 5.8.2. For the five listed cases identified in Table 5.8-1, compliance with the SGMP and CHSP associated with the Guy Hill Cadillac site, and the HMBP associated with the AT&T California site, would be required for development at or adjacent to these sites. Closure has been recommended for the Chevron and Mission Bay Property, and it is believed that there are no open releases at the Dry

Cleaner Empire of America. As a result, further compliance or remediation actions are not anticipated at either site. Program-level impacts would be less than significant. Because regulations directing clean up and rehabilitation of hazardous materials sites are mandatory, and because such occurrences are tied to specific localized sources, they are not expected to combine with potential effects from other cumulative projects. BASASP-related potential cumulative impacts associated with health hazards would be less than significant and not cumulatively considerable.

6.3.8.2 Flood Hazards

As stated in Section 5.8.5.2 of this PEIR, potential impacts related to flood hazards from implementation of the proposed BASASP would be less than significant, based on the following considerations: (1) no development within the BASASP area would occur within the 100-year floodplain; and (2) all proposed BASASP development is located outside of potential tsunami/ seiche and dam inundation areas. Program-level impacts, therefore, would be less than significant. Because there would not even be incremental impacts related to development within a 100-year floodplain or allocation within a tsunami/seiche or dam inundation area, BASASP-related contributions to the cumulative condition would also be less than significant and not cumulatively considerable.

6.3.8.3 Emergency Response and Evacuation Plans

As stated in Section 5.8.6.2 of this PEIR, potential impacts related to impairment of or interference with adopted emergency response and evacuation plans from implementation of the proposed BASASP would be less than significant, based on the nature of the proposed BASASP development and required compliance with associated criteria under MHMP, SD-OHC, and EOP guidelines. BASASP-proposed goals or objectives would not interfere with or diminish the capacity of these programs and facilities to provide effective emergency response or emergency evacuation in the BASASP area or other areas. In addition, the proposed BASASP would include circulation improvements such as modifying the I-5 northbound ramp to include a dual right-turn only with signal control at Balboa Avenue that would improve access capabilities for response vehicles and personnel in emergency scenarios. Based on these considerations, as well as the fact that development proposed under the BASASP would be required to comply with applicable City emergency evacuation criteria, impacts related to interference with emergency evacuation plans from implementation of the proposed BASASP would be less than significant. Similarly, based on the described conditions, as well as the fact that the proposed BASASP is consistent with related elements of the General Plan, potential cumulative impacts associated with emergency response and evacuation plans would be less than significant and not cumulatively considerable.

6.3.8.4 Wildfire Hazards

The BASASP area is generally urbanized with low potential for wildfire hazards. An exception is some of the northeastern corner of the BASASP area, which is identified as within the very high fire hazard severity zone. Implementation of development under the proposed BASASP within or adjacent to these areas could potentially result in significant impacts related to wildfire hazards.

As stated in Section 5.8.7.2 of this PEIR, potential impacts related to wildfire hazards from implementation of the proposed BASASP would be less than significant, based on required

compliance with applicable state and City standards associated with fire hazards and prevention. Given the required compliance with applicable state and City standards associated with fire hazards and prevention, combined with the generally developed nature of the BASASP area, the proposed project, in conjunction with past, present, and foreseeable future projects, would not exacerbate wildfire hazards in the area. Impacts would not be cumulatively considerable.

6.3.9 Hydrology, Water Quality, and Drainage

The General Plan PEIR identifies significant potential cumulative impacts to hydrology, water quality, and drainage, based on conversion of existing pervious areas to impervious surfaces such as paved highways, streets, rooftops, and parking lots. While the General Plan PEIR analysis notes that conformance with existing related regulatory requirements would generally address potential hydrology, water quality, and drainage impacts (e.g., through City and related NPDES standards), additional site-specific mitigation is identified, and the analyses for both drainage and water quality issues note that incremental impacts may not be fully addressed through regulatory conformance and require additional measures. Accordingly, the General Plan PEIR concludes that regional incremental hydrological impacts related to absorption rates, drainage patterns, rates of surface runoff, and water quality are considered cumulatively significant and unavoidable.

6.3.9.1 Runoff

The analysis in Sections 5.9.4.1 of this PEIR states that the BASASP area is highly developed with impervious surfaces and that the rate and/or volume of runoff is not likely to be increased by new development. In fact, it is noted that it is more likely that the volume and rate of runoff could be slightly decreased, and infiltration rates would slightly increase, due to storm water quality regulations which require implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual would require installation of LID practices such as bioretention (biofiltration) areas, cisterns, and/or rain barrels can be expected to improve surface drainage conditions, or at a minimum, to not exacerbate flooding or cause erosion.

In addition, the Urban Design chapter of the proposed BASASP contains policies to improve drainage patterns and decrease surface runoff in Policies 4.4.7 through 4.4.9 related to storm water filtration features, use of medians on Grand Avenue for storm water retention, and additional storm water features such as bioswales, pervious strips, flow-through planters, and pervious pavement. The BASASP Conservation Chapter contains policies (7.2.1 through 7.2.3) related to urban runoff management that encourage the incorporation and prioritization of LID practices and storm water BMPs.

Section 5.9.4.2 concludes that future development within the BASASP area would be subject to grading and drainage regulations in the Municipal Code and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed BASASP area would be reduced when compared to the existing condition and project-level impacts to runoff from implementation of the proposed BASASP would be less than significant.

The cumulative projects also would be subject to the same mandatory regulatory requirements. Also, a number of the projects are similarly either already highly developed given their locations, or, as for the Tecolote Specific Plan, consist of trails improvements in a largely natural setting and do not assume additional large areas generating runoff rather than percolation. Cumulatively, a reduction in runoff over existing conditions is anticipated. Thus, BASASP contributions to cumulative impacts associated with runoff generation would be less than significant and not cumulatively considerable.

6.3.9.2 Pollutant Discharge

The analysis in Section 5.9.5.2 of this PEIR concludes that potential impacts related to pollutant discharge from implementation of the proposed BASASP would be less than significant, based on mandatory compliance with associated regulatory requirements. Specifically, this would include City and related NPDES storm water standards, which would entail preparation of site-specific water quality analyses for future development to identify applicable site design, source control, and treatment control BMPs. In addition, many of the standard BMPs required under current regulatory guidelines also encompass LID measures to effectively avoid or reduce pollutant generation and discharge. Project-level impacts would be less than significant.

The other cumulative projects identified in Table 6-1 would be similarly mandated to meet these regulatory standards. Based on these considerations, as well as the fact that the proposed BASASP is consistent with related elements of the General Plan, potential cumulative impacts associated with pollutant discharge would be less than significant and BASASP contributions to future conditions would not be cumulatively considerable.

6.3.9.3 Water Quality

As noted above and in Section 5.9.6.2 of this PEIR, implementation of the proposed BASASP is not expected to increase the rate and/or volume of runoff or related pollutant discharges. In addition, BASASP-related runoff would be subject to mandatory compliance with existing water quality regulatory standards as set forth in the ~~city's~~ City's Drainage Design Manual and Storm Water Standards Manual. As a result, associated potential water quality impacts related to water quality concerns would be less than significant on a project level. The other cumulative projects identified in Table 6-1 would be similarly mandated to meet these regulatory standards. As a result, cumulative project contributions would be less than significant and BASASP contributions to future conditions would not be cumulatively considerable.

6.3.10 Noise

The General Plan PEIR identifies significant potential cumulative noise impacts, based on projected increases in ambient noise levels from conditions such as improvements to major transportation facilities and construction of new stationary noise sources. While the General Plan PEIR analysis notes that conformance with existing related regulatory requirements generally would preclude exposure of sensitive receptors to increased noise levels, additional site-specific mitigation is identified, and it is noted that incremental impacts may remain significant and unavoidable where no feasible mitigation exists. Accordingly, the General Plan PEIR concludes that: "...incremental exposure of sensitive receptors to increased ambient noise levels..., when viewed in connection with

the increased number of trucks, buses, and trains along these corridors and new stationary sources associated with development elsewhere in the county, are considered cumulatively significant and unavoidable.”

6.3.10.1 Compatibility of Proposed Land Uses with City Noise Guidelines

Section 5.10.4.1 of this PEIR addresses exterior noise from traffic, rail lines, airports, and stationary noise sources, as well as related interior noise levels. Significant project-related impacts from rail noise would not occur because the proposed BASASP would not affect rail facilities and is also restricted to areas without sensitive receptors in the areas of substantial effect. Airport noise is assessed as less than significant because the BASASP area is not located near airports or within the 60 CNEL noise contour of the closest airports (Montgomery Field, located 3.8 miles to the east, and San Diego International Airport, located 4.3 miles to the south). Stationary noise sources are also assessed as resulting in less than significant ~~guideline~~ impacts because development related to the proposed BASASP would be subject to limits imposed by the City’s Noise Ordinance. Section 5.10.4.2 concludes that implementation of the proposed BASASP and traffic-related noise would potentially expose new development to noise levels at exterior use areas or interior areas in excess of the noise compatibility guidelines established in the City’s Noise Element. This would result in an inconsistency with City standards and a potentially significant noise impact on a project level. This would occur largely based on existing baseline noise (including areas within the I-5 freeway noise contours). Also, although noise levels throughout the BASASP area would generally increase, many segments, including Balboa Avenue, Grand Avenue, and Morena Boulevard, would see reduced traffic and therefore, lower noise levels upon implementation of the proposed BASASP. It is also noted that terrain variation between the noise source and the receptors can result in exterior noise being infeasible to address (e.g., I-5 is raised above some receptors, and a sound barrier could be higher than the protected receptor, or the exterior use area could for some other reason be impossible to shield). Ultimately, as shown on Table 5.10-5, BASASP-related exterior noise impacts would be less than 3 dBA increases, or exterior levels of 65 dBA would be maintained.

Consistent with the General Plan Policy NE-A.4, Mitigation Measure NOI-1 was identified to ensure that noise-sensitive land uses would not be exposed to noise levels in excess of City standards. NOI-1 requires that where new development would expose people to noise exceeding normally acceptable levels and based on land use type and specific exterior noise level ranges, a site-specific acoustical analysis must be performed prior to the approval of building permits. The analysis would ensure that barriers, building design, and/or location are capable of maintaining interior noise levels at 45 CNEL or less for residences and 50 CNEL or less for commercial uses. This lowers potential project-level impacts to a less than significant level.

As opposed to the I-5 (white noise) or rail noises, local traffic generates relatively localized noise that does not extend long distances. The land uses immediately surrounding the BASASP are not expected to substantially change (adjacent areas of Pacific Beach and Clairemont Mesa are largely built out and open space/recreational areas associated with Mission Bay are anticipated to remain). As a result, the cumulative condition is not expected to substantially change. Implementation of actions pursuant to Mitigation Measure NOI-1, along with implementation of local, state, and federal noise control laws, would similarly reduce impacts related to noise to less than significant for future development. Thus, implementation of the proposed BASASP would not contribute to the significant

cumulative impacts identified by the General Plan PEIR, and the cumulative impact would be less than significant, with project related contributions also being less than considerable.

6.3.10.2 Substantial Noise Level Increase

As stated in Section 5.10.5.2, and alluded to above, in comparison with existing conditions, future development pursuant to the proposed BASASP would increase by more than 3 CNEL along only one roadway segment of Santa Fe Street between Damon Avenue and Balboa Avenue. Because (excluding freeway noise), exterior noise levels along this segment would remain below 65 CNEL, implementation of the proposed BASASP would not result in a significant increase in noise levels on this roadway or any other analyzed local roadway. Localized changes within the cumulative projects would be the same as noted in Section 6.3.10.1. Because there would be no significant impacts with respect to traffic noise on local streets, or project-related increases to rail noise or noise from stationary sources, project-related contributions to the cumulative condition is also assessed as less than significant and less than cumulatively considerable.

6.3.10.3 Vibration Impacts

As described in Section 5.10.6.1 of this PEIR, potentially significant ground-borne vibration impacts in the BASASP area are related to trains on the rail line that traverses the area. "Screening" distances for potential impacts are identified for different land uses, and distances within which impacts could result (120 to 600 feet from the lines, variously) are identified. Program-related construction activities (e.g., use of a pile driver or vibratory roller) also could result in temporary impacts within distances ranging up to 600 feet from the construction activity.

Section 5.10.6.2 concludes that new development proposed within the screening distance of the tracks and development proposing vibratory construction equipment would require further analysis to determine vibration-sensitive impacts. Two Mitigation Measures, NOI-2 and NOI-3, are identified for this issue. Because it cannot be known whether vibration-reduction measures are adequate to minimize vibration levels to below a level of significance at the program level, vibration impacts would therefore be significant and unavoidable.

The measures require a site-specific vibration study within FTA screening distances for potential vibration impacts related to train activity and for the uses of concern, with the proposed development then required to implement recommended measures within the technical study to ensure that projects meet the FTA criteria for vibration impacts (NOI-3). Secondly, a site-specific vibration study would be required for proposed sensitive land uses within 200 feet of construction and for vibration-sensitive uses within 600 feet of pile-driving; with requirements to reduce construction-related vibration impacts to below 0.1 inch per second PPV at vibration-sensitive uses. These measures would reduce potential vibration-related impacts to a less than significant level.

The very focused nature of these impacts (restricted to within a worst-case 600 feet) indicates that project vibration is unlikely to combine with vibration generated by any of projects listed on Table 6-1. Thus, implementation of the proposed BASASP would not contribute to the significant cumulative impacts identified by the General Plan PEIR with implementation of the identified mitigation measures, and the cumulative impact would be less than significant and not cumulatively considerable.

6.3.10.4 Construction Noise Impacts

The analysis in Section 5.10.7.1 of this PEIR concludes that Mitigation Measure NOI-4 would be required to reduce potential construction-related noise impacts. However, construction noise from implementation of the proposed BASASP would be significant and unavoidable due to the inability at the program level to determine a future project's conformance with related standards in the Municipal Code (Noise Control Ordinance).

Based on this conclusion, as well as the fact that construction-related noise impacts are short-term in nature and focused in small geographic areas, associated potential cumulative impacts from implementation of the proposed BASASP would be less than significant and not cumulatively considerable.

6.3.11 Paleontological Resources

The General Plan PEIR identifies potentially significant impacts to paleontological resources in association with excavation and grading requirements for new development.

As noted in Section 5.11.3.1 of this PEIR, the BASASP area includes a number of formations (old paralac deposits, San Diego, Scripps, Mount Soledad, Ardath Shale) characterized with a high paleontological resources sensitivity rating. While portions of the BASASP area encompassing these formations have been previously disturbed and developed with existing urban uses, grading associated with future development activities could potentially expose undisturbed formational areas. Based on the presence of formational units exhibiting high potential for the occurrence of sensitive paleontological resources in the BASASP area, associated BASASP-related potential impacts from future development activities could be significant. A mitigation measure, PALEO-1, is provided.

Mitigation Measure PALEO-1 requires future discretionary projects to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources during construction activities would be implemented at the project level and provide mitigation for the loss of important fossil remains. The measure requires review of each future discretionary project prior to approval to assess the underlying geologic formations, and determine, based on resource significance, if the cubic yards of excavation would require additional action. As appropriate, monitoring is required, with additional mitigation to occur as appropriate. Implementation of actions pursuant to Mitigation Measure PALEO-1, would reduce BASASP-related impacts to important paleontological resources resulting from implementation of discretionary projects to less than significant for future development.

Future ministerial projects would also likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, BASASP impacts related to future ministerial development would remain significant and unavoidable.

Cumulatively, the importance of individual paleontological resources is related to the inherent scientific data and associated research value. Information gained from test excavations and data

recovery programs within the study area and other locations having paleontological resource impacts would be presented in reports and filed with appropriate regulatory agencies and scientific institutions with permanent paleontological collections, such as the San Diego Natural History Museum. The fossil collections from any potentially significant site also would be curated at such a scientific institution and would be available to other paleontologists for further study. For discretionary development projects, the cumulative projects identified in Table 6-1 would be subject to similar analysis and (if applicable) mitigation requirements for paleontological resources. Based on the required compliance of both the proposed project and applicable cumulative projects with the analysis and mitigation requirements for paleontological resources, future discretionary development associated with implementation of the proposed BASASP would not result in significant cumulative paleontological resource impacts and would not be cumulatively considerable.

Future ministerial development implemented under the proposed project and other program- or plan-level projects identified in Table 6-1 could result in the cumulative loss of paleontological resources throughout the county. Thus, future ministerial development associated with implementation of the proposed BASASP would result in significant cumulative paleontological resource impacts, with project related contributions being considerable. Such cumulative impacts would remain significant and unavoidable.

6.3.12 Population and Housing

The General Plan PEIR notes that implementation of General Plan and CEQA policies, as well as compliance with associated regulatory requirements, generally would preclude incremental impacts related to the displacement of substantial numbers of people or housing. These requirements, along with site-specific mitigation, are generally anticipated to address incremental displacement impacts, although impacts could remain significant and unavoidable where no feasible mitigation exists.

6.3.12.1 Population Displacement

As described in Section 5.12.4.1 of this PEIR, the proposed BASASP would increase allowed residential densities in existing commercial areas to promote transit-oriented development, and to increase the density of certain residential areas in accordance with City policies, goals, and regulations, as well as projected regional population growth. In the western-most portion of the BASASP, temporary displacement of population or housing stock would occur if existing housing is demolished for future development. The BASASP area's total housing stock, however, ultimately would increase compared to existing levels and those allowed under the adopted Pacific Beach Community Plan/LCP. No currently designated residential areas would be re-designated or rezoned to solely non-residential uses. Substantial numbers of existing housing or people would not be displaced, therefore necessitating the construction of replacement housing elsewhere. Rather, housing numbers in the area would rise, and be able to accommodate increased population near to established transit and other amenities. Based on this, Section 5.12.4.2 concludes impacts related to the displacement of residents would be less than significant.

Cumulatively, the projects in Table 6-1 also would be expected to retain, or add to, housing (see Jefferson, Eco-block, and Coastal Trailer Villas). Therefore, it is not expected that the cumulative projects would result in loss of housing, and the BASASP program would increase residential units.

BASASP-related cumulative impacts to population displacement are identified as less than significant and not cumulatively considerable.

6.3.12.2 Growth Inducement

As addressed in Section 5.12.5.1 of this PEIR, SANDAG population projections for the BASASP area indicate that population will increase over time, regardless of whether or not the Specific Plan is implemented. The projected growth is not the same as under the proposed BASASP, however. A total of 4,729 dwelling units would be available under the BASASP, an increase of 3,966 units (approximately 520 percent) over existing (763 households in 2016) numbers in this particular portion of Pacific Beach and 3,508 (approximately 287 percent) units over the adopted Pacific Beach Community Plan total of 1,221 in 2035.

As an established urban community, the existing infrastructure within this eastern portion of Pacific Beach would be able to support the anticipated population without major additions or expansions which could induce additional growth. No new roads or roadway extensions would be required, and because the area is developed, there are no substantial areas of undeveloped land within the BASASP area that could induce population growth.

As discussed in Section 5.13, *Public Services*, the public facilities (e.g., libraries, schools, and fire/police protection) needed to support development already exist in the area. As discussed in Section 5.13, the Pacific Beach and Clairemont Mesa communities currently have a deficit of parkland, and the proposed BASASP does not include additional parkland. Therefore, an overall park deficit would occur at buildout of the proposed BASASP. Where existing and proposed park space is not sufficient for the projected population growth, the General Plan allows for the use of park equivalencies, as determined by the community and City staff, through a set of guidelines. The BASASP area is a heavily urbanized community where park equivalencies would be appropriate for satisfying some population-based park needs. Thus, the population growth associated with the proposed BASASP would not exceed the ability of the public facilities to meet the projected demand. Similarly, as discussed in Section 5.14, *Public Utilities*, existing public utilities (energy, water, sewer, and solid waste collection, processing, and disposal) are currently available in the area and expected to be able to serve additional development without major expansions which might induce growth.

As a result, as stated in Section 5.12.5.1, no new or major expansion of infrastructure serving the area is anticipated to occur as a result of implementation of the proposed BASASP. Furthermore, the proposed BASASP includes planning, design, and implementation strategies intended to accommodate project effects, such as housing provision and non-vehicular transportation options. Project-level impacts are assessed as less than significant.

Cumulatively, and outside the BASASP's boundaries, substantial growth is not expected due to the areas being largely built out as an existing condition. One of the cumulative projects (Jefferson) is actually within BASASP boundaries and is therefore addressed in the above discussion. The other residential project (Coastal Villa Trailers) is located over a mile distant from the BASASP area. It would be served by different local utility lines and (excluding regional park lands) services. The total number of new residences provided by this residential project also is 150 units. As described above, existing services would be expected to be able to serve additional development without major expansions which might independently induce growth. Based on this, the cumulative condition is also anticipated to be less than significant, with BASASP contribution not cumulatively considerable.

6.3.13 Public Services

The General Plan PEIR identifies significant potential cumulative impacts associated with police, fire, schools, libraries, parks, and other services, based on related demands from projected development. Conformance with existing related regulatory requirements, along with site-specific mitigation, is generally anticipated to address these impacts, although it is noted that they could remain significant and unavoidable where no feasible mitigation exists. Accordingly, the General Plan PEIR concludes that: "...incremental impacts associated with the construction of future public services and facilities infrastructure improvements, when viewed in connection with the increased regional demand for and construction of such improvements, are considered cumulatively significant and unavoidable."

6.3.13.1 Public Services and Facilities

The analysis in Section 5.13, *Public Services*, concludes that impacts from implementation of the BASASP on police and fire services, schools, libraries, and parks would be less than significant. This is based on the following considerations enumerated in Section 5.13.4.2.

Relative to fire protection, adequate service is expected to be available to meet the needs of future development in accordance with the proposed BASASP. Thus, no new fire facilities which could result in physical impacts on the environment would occur. Impacts related to fire protection services would be less than significant.

Changes to police staffing or facilities, if any, would be dependent on division and citywide needs as determined by the SDPD. The SDPD does not plan future operational needs based on individual projects such as those that would be implemented under the proposed BASASP. Thus, no new construction of police facilities which could result in physical changes to the environment would occur as a result of the proposed BASASP. Consequently, impacts related to police services would be less than significant.

Although the amount of parkland included in the proposed BASASP would be inadequate to meet the demand at buildout; use of park equivalencies, as defined in the General Plan, could be appropriate to satisfy the deficit of some population-park needs (see Section 5.13.4.2 for detail).

The funding of recreational facilities is an implementation policy in the General Plan. If new parkland or recreational facilities are required as part of a development project, potential environmental effects would be analyzed on a case-by-case basis to ensure that population-based parks are provided for, either through development of park and recreation facilities or payment of the DIF or other appropriate fees. If new parkland or recreational facilities are proposed as part of a development project, potential environmental effects would be analyzed at that time. The construction of new park facilities would be subject to separate environmental review at the time design plans are available. Therefore, at this program level, the impacts related to the provision of new park and recreation facilities within the BASASP area are assessed as less than significant.

By law, payment of school fees is considered sufficient to avoid significant impacts of new development on schools. In addition, no new school facilities are anticipated to be necessary to

serve the BASASP area at buildout under the proposed BASASP. Thus, project-level impacts on schools would be less than significant.

There are no libraries included in the proposed BASASP. Thus, no new construction of library facilities, which could result in physical changes to the environment, would occur as a result of the proposed BASASP. Consequently, project level impacts related to library service would be less than significant.

~~In summary, developer fees, such as school impact fees, DIFs, and other appropriate fees would contribute toward minimizing impacts to fire protection, libraries, parks and recreational facilities, and schools. Future development proposals under the BASASP would be required to pay applicable impact fees prior to the issuance of building permits. As discussed in this section, implementation of the proposed BASASP does not include the construction of any specific public facilities or services.~~ The construction of any new or altered public facilities that may be needed would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Evaluating potential environmental impacts at this time would be speculative as the location and design of these new facilities is unknown. Therefore, impacts would be less than significant at the programmatic level.

~~Similarly, the specific development projects noted in Table 6-1 would be required to pay fees as appropriate and provide adequate levels of service. The specific public facilities improvements that would be constructed for the development projects noted in Table 6-1, and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis.~~ Some of the projects (Tecolote Canyon, Fiesta Island, and De Anza ~~Cove Amendment~~ Revitalization Plan) also directly address public services (parks) improvements. The BASASP program contribution to cumulative effects would be less than significant and not cumulatively considerable. If, in the future, new facilities are required, they would be subject to subsequent environmental review.

6.3.14 Public Utilities

The analysis of potential cumulative water supply impacts in the General Plan PEIR concludes that such effects are less than significant, based on supply and demand projections provided in the San Diego County Water Authority Urban Water Master Plan. The General Plan PEIR analysis also notes, "If unforeseen water shortages occur and alternative water sources are not available, development that could significantly impact water supply either individually or cumulatively shall only receive entitlement from the City if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact." Relative to cumulative conditions related to public utility infrastructure including storm water, water, wastewater, and solid waste systems/facilities, the General Plan PEIR does not identify significant impacts. This conclusion is based on required conformance with the General Plan and CEQA processes for applicable development projects, with the analysis concluding that implementation of those policies and compliance with federal, state, and local regulations would preclude the incremental impacts associated with new construction of, or improvements to, public utilities infrastructure. Finally, the General Plan PEIR concludes that potential cumulative impacts related to solid waste would be less than significant.

6.3.14.1 Water Supply

As discussed in Section 5.14.4.1, the WSA prepared for the proposed BASASP (City 2018) concluded that the proposed BASASP is consistent with the water demands assumptions included in the regional water resource planning documents of the Water Authority and MWD. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the Water Authority, and MWD to serve the projected demands of the proposed project area, in addition to existing and planned future water demand of the PUD. Therefore, cumulative impacts related to water supply would be less than significant and not cumulatively considerable.

6.3.14.2 Utilities

As described in Section 5.14.5.1, the General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed BASASP would result in infill, redevelopment, and an increase in population within selected areas as stated in the proposed BASASP. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure as well as various communications systems. However, some infrastructure such as aging pipelines are in need of replacement. The BASASP area's existing infrastructure deficiencies would require capacity improvements and replacement schemes to serve the existing and projected population. The section reviews issues related to Water Distribution; Wastewater Collection, Treatment, and Disposal; Stormwater Conveyance; and Communications.

Section 5.14.5.2 concludes that systematic improvements to water, wastewater, and storm water facilities throughout the BASASP area are expected to be provided as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process. Upgrades to water and sewer are administered by the PUD and are handled on a project-by-project basis. Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Transportation and Storm Water Department (T&SW). Per City Council Policy 800-04, private land owners and developers are responsible for upgrading and maintaining storm water drainage facilities on private property. Future developments under the proposed project will be reviewed by the City to determine the necessary infrastructure improvements. The necessary infrastructure improvements would be standard practice for new development to maintain and/or upgrade the existing system. Therefore, impacts to water, sewer, and storm water utilities would be less than significant. Because utility and communications providers have the capacity to serve the BASASP area, project-level impacts would be less than significant. To be confirmed upon receipt of additional technical reports.

Cumulatively, the proposed BASASP would be consistent with applicable elements of the General Plan, and potential cumulative impacts associated with storm water, water, wastewater, and communication systems would be less than significant. The conditions described above relative to routine upgrades and existing presence of service providers also would pertain to other service-requiring projects listed on Table 6-1. Cumulative impacts would be less than significant, and the project's contribution would not be cumulatively considerable.

6.3.14.3 Solid Waste Management

As stated in Section 5.14.6.1 of this PEIR, development projects that would result from implementation of the proposed BASASP must comply with City ordinances related to solid waste. Although projections indicate current diversion rates achieved through compliance with these ordinances achieves fall short of diversion goals, discretionary projects with the potential to generate 60 tons or more of solid waste would be required to prepare a project-specific WMP. It is anticipated that the solid waste disposal needs of future residents and businesses would increase as a result of implementation of the proposed BASASP. Future developments allowed under the proposed BASASP would be evaluated on a project-specific basis for potential impacts to solid waste services.

Section 5.14.6.2 concludes that implementation of the proposed BASASP would be anticipated to increase the solid waste management needs within the area. When land uses are more concentrated, per-unit environmental impacts associated with solid waste management, such as collection truck miles per ton collected, are reduced. Greater efficiencies, and hence expanded opportunities for the recycling of marginally marketable items, become more feasible. Future BASASP development projects would be required to comply with the Municipal Code. In addition, any future discretionary development exceeding the 60-ton threshold must prepare a WMP targeting 75 percent waste reduction. Project-level impacts are therefore identified as less than significant.

Other development projects such as those listed in Table 6-1 would be required to meet the same requirements. Based on the described conditions, as well as the fact that the proposed BASASP is consistent with related elements of the General Plan, potential cumulative impacts associated with solid waste management would be less than significant and the project's contribution would not be cumulatively considerable.

6.3.15 Transportation/Circulation

The General Plan PEIR does not specifically address cumulative effects to alternative transportation. Relative to roadway networks, the General Plan PEIR concludes that "...incremental impacts associated with an increase in roadway miles at LOS E or F on the planned transportation network, when viewed in connection with regional traffic LOS impacts, is considered cumulatively significant and unavoidable."

6.3.15.1 Alternative Transportation Modes

While the General Plan PEIR does not specifically address cumulative effects to alternative transportation, potential impacts related to rail/bus, bicycle, and pedestrian transportation are evaluated in Section 5.15 of this PEIR. As stated in Section 5.15.4.2, all recommended BASASP pedestrian, bicycle, and transit-related improvements would improve alternative transportation connectivity and accessibility. Facilities planned as part of the proposed BASASP would increase, rather than decrease, the percent of alternative mode trips in the City's transportation system. The proposed BASASP would not result in adverse impacts to alternative transportation modes.

The Clairemont Mesa Community Plan Update, Morena Corridor Specific Plan, Mission Boulevard Public Spaces and Active Transportation Plan, and USD Master Plan Update all do, or are expected to, take alternative transportation modes into account; providing for pedestrian and non-vehicular uses within their plan areas. The parks projects listed on Table 6-1 expressly address trails and non-vehicular uses. Cumulative project effects on pedestrian facilities, bicycle facilities, and rail and bus facilities are therefore expected overall to be beneficial rather than adverse, would not contribute to cumulative significant impacts, and would therefore be less than significant. Implementation of the proposed BASASP would not result in a cumulatively considerable contribution to adverse conditions related to alternative transportation modes.

6.3.15.2 Plans or Policies Supporting Alternative Transportation Modes

All recommended transit improvements would create new/enhanced alternative transportation opportunities within the BASASP area. All recommendations also would improve alternative transportation connectivity and accessibility. These actions constitute implementation of the policies, plans, or programs supporting alternative transportation modes rather than conflicting with them. Project implementation would not substantially adversely impact planned alternative transportation mode systems and would not result in adverse impacts to policies, plans, or programs supporting alternative transportation modes. The beneficial changes resulting from projects in Table 6-1 as described in Section 6.3.15.1 also pertain to this issue. No adverse cumulative impact to these plans or policies would result and implementation of the proposed BASASP would not result in a cumulatively considerable adverse contribution to plans or policies supporting alternative transportation modes.

6.3.15.3 Roadway Segments

As described in Section 5.15.6.2 of this PEIR, cumulative impacts to 11 identified roadway segments along Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive would remain significant and unavoidable upon implementation of the proposed BASASP. This is due to a combination of elements, including: (1) implementation of the improvements being contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; ~~and (2) insufficient ROW to construct the improvements, and (3) roadway and intersection widening could impact existing or proposed pedestrian (such as at Clairemont Drive and Balboa Avenue intersection) or bicycle facilities, which could discourage walking and bicycling.~~ As such, mitigation measures evaluated for Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive segments are considered infeasible due to policy considerations, in addition to potential additional air quality, noise, GHGs, and solid waste environmental effects.

The other cumulative development projects would generate traffic impacts, but also would be expected to largely provide specific mitigation unless they are also specifically designed to support alternative transportation modes. Overall, existing traffic conditions indicate levels of congestion, and additional projects would incrementally contribute to those cumulative conditions. As indicated for the project, cumulative impacts would result. The project's contribution would be cumulatively considerable.

As described in Section 5.15.6.3 of this PEIR, one of the primary principles of smart growth is to encourage the use of alternative forms of transportation by discouraging reliance on the private

automobile. As potential evaluated road improvements would reduce traffic congestion and encourage automobile use, these mitigation measures can generally be considered inconsistent with the overall goals of the General Plan and BASASP. Additionally, roadway and intersection widening could impact existing or proposed pedestrian or bicycle facilities and could impact adjacent development and result in additional air quality, noise, GHGs, and solid waste environmental effects. All of these considerations support retention of the proposed condition and BASASP implementation despite the cumulative impact to roadway segments.

6.3.15.4 Intersections

As described in Section 5.15.6.2, and similar to roadway segments, based on the feasibility of traffic mitigation measures, not all recommended identified potential mitigation measures resulting in improvements are feasible. Consequently, cumulative impacts to one intersection would remain significant and unavoidable upon implementation of the proposed BASASP during the p.m. peak period: Clairemont Drive and Balboa Avenue. Conditions for cumulative projects listed in Table 6-1 would be similar to those described in Section 6.3.15.3 and thus, the project's contribution would be cumulatively considerable.

6.3.15.5 Freeway Facilities

As described in Section 5.15.6.2, impacts to four freeway segments of I-5 and two freeway ramp meters would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur prior to the assumed buildout of 2035. Thus, the project would result in significant cumulative impacts and the project's contribution would cumulatively considerable.

6.3.16 Visual Effects and Neighborhood Character

The General Plan PEIR identifies significant potential cumulative visual and neighborhood character impacts, based on anticipated effects to scenic views, topographic/relief features, and community character from projected development. While the General Plan analysis notes that conformance with existing related regulatory requirements (including General Plan and CEQA standards) would generally preclude visual/character impacts, additional site-specific mitigation is identified and the analysis notes that "...incremental impacts may remain significant and unavoidable where no feasible mitigation exists." Accordingly, the General Plan PEIR concludes that "...incremental impacts related to...public views or to any significant visual landmarks or scenic vistas..., substantial changes in topography or to ground surface relief features, and negative and substantial alteration of the existing character of the plan area are considered cumulatively significant and unavoidable."

6.3.16.1 Public Views

As stated in Section 5.16.4.2 of this PEIR, the proposed BASASP would not substantially alter or block public views from public viewing areas within the BASASP area. Project-specific impact levels would range from no impact to less than significant. The cumulative projects are located at distance from the BASASP area and are often not within the same viewshed (e.g., Tecolote Canyon edges are located on the mesa top, separated from any potential views toward the project, or the Mission Boulevard project is located along the beach, with approximately two miles of intervening developed

uses. Tecolote Canyon views are also identified in the Clairemont Mesa Community Plan as short-range views, and oriented in toward the canyon as opposed to outward (see Figure 2 of that plan). As noted in Section 5.16.4.1, the BASASP setting is also often located below the viewer, which eliminates the potential for view interruption as the viewer would look over the project. City plans guard against loss of identified view corridors. Each of the cumulative projects is either located in an area where view corridors are not identified or would have specific views toward view elements such as the Pacific Ocean protected (e.g., the Coastal Trailer Villas project would comply with the 30-foot overlay zone). Potential cumulative impacts associated with public views, visual landmarks, and scenic vistas, are assessed as less than significant and implementation of the proposed BASASP also would make a less than considerable contribution.

6.3.16.2 Neighborhood Character

As stated in Section 5.16.5.2, the land use plan, policies, and recommended mobility enhancement of the proposed BASASP, along with implementation of the LDC, would provide for a more unified character than currently exists within this diverse area of the community, while not affecting any of the more consistent neighborhoods to the north, west, east or south. Project-proposed gateways would provide additional visual landmarks to enhance the overall visual quality and perception of community of the BASASP area. Although development intensity would increase the project's design guidelines would ensure that implementation of the proposed BASASP would not negatively and substantially alter the character of the neighborhood; less than significant impacts are identified.

Cumulatively, most of the projects in Table 6-1 are not located within the same neighborhood, which is a very localized community. The Jefferson project is included in the BASASP area. The parts of the BASASP area adjacent to the Clairemont Mesa Community Plan Update between Morena Boulevard and Santa Fe Street are not undergoing change as part of the proposed BASASP and would remain light industrial in nature. These projects also consist of geographically isolated (from the other cumulative projects) intensifications within a specific area or are designed to enhance recreational activities.

Based on these considerations, potential cumulative impacts associated with neighborhood character compatibility are identified as less than significant. Similarly, based on these considerations, as well as the fact that the proposed BASASP is consistent with related elements of the General Plan, the projects contribution also would not be considerable.

6.3.16.3 Landform Alteration

As stated in Section 5.16.6.2, potential landform alteration impacts would be less than significant because future development implemented under the proposed BASASP would mostly occur within the generally level portion of the BASASP area that is already developed, and such future development activities would not substantially alter existing natural landforms.

The other projects in Table 6-1 area also being implemented in previously disturbed/graded areas and/or are park projects with expressly restricted grading into the natural landform. Potential cumulative impacts associated with landform alteration are assessed as less than significant, with BASASP contribution being not cumulatively considerable.

6.3.17 Agriculture and Forestry Resources

Potentially significant cumulative impacts to agriculture are identified in the General Plan PEIR, in association with new development and the related loss of existing agricultural lands including Prime Farmland, Unique Farmland, Farmland of Statewide Importance, lands under Williamson Act contract, and land zoned for agricultural use. Forestry resources are not specifically addressed in the General Plan PEIR.

6.3.17.1 Agriculture

As described in Section 8.1.1 of this PEIR, the BASASP area consists entirely of Urban and Built-up Land, as mapped by the CDC (CDC 2016). As such, implementation of the proposed BASASP would not result in the conversion of agricultural resources to non-agricultural uses. The non-agricultural setting of the projects listed in Table 6-1 (refer to Figure 6-1) also results in less than significant cumulative impacts to agriculture, with BASASP contribution not cumulatively considerable.

6.3.17.2 Forestry Resources

As described in Section 8.1.2 of this PEIR, the majority of the BASASP area is developed for urban uses. Undeveloped areas are low in acreage and surrounded by development. As such, none of the areas have potential to support forestry resources. Trees in Tecolote Canyon would be protected under the master plan, with mitigation implemented for any resources lost during trail construction. The overall non-forested nature of projects listed in Table 6-1 (refer to Figure 6-1) also results in less than significant cumulative impacts to forestry resources for these projects, with BASASP contribution not cumulatively considerable.

6.3.18 Mineral Resources

The General Plan PEIR identifies potentially significant impacts to mineral resources based on population growth and the related generation of incompatible land uses, as well as open space preservation that may locally preclude access to mineral resources.

6.3.18.1 Minerals

As described in Section 8.2, impacts to mineral resources in areas designated as Mineral Resource Zone (MRZ-) 2 (resource present) by the CGS (CGS 1996) are considered significant on a project level. The BASASP area does not include mapped MRZ-2 designations, but instead includes mapped MRZ-1 (resource not present) and MRZ-3 (resource potentially present) designations (CGS 1996, City of San Diego 2008a). These small areas within the 0.7-acre of the BASASP area are unavailable for mining operations due to existing development. As such, the proposed BASASP would not impact potentially mineable mineral resources. Regardless of underlying resources, the cumulative projects in Table 6-1 are also eliminated as good candidates for mining based (variously) on their existing and ongoing development, their size, their locations (surrounded by existing development, and/or their designation as MHPA or recreation. Associated cumulative impacts are therefore considered less than significant. Based on the described conditions, as well as the fact that the proposed BASASP is consistent with related elements of the General Plan, potential cumulative impacts from the project associated with mineral resources would be less than significant and not cumulatively considerable.

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7.0 GROWTH INDUCEMENT

7.1 Introduction

Section 15126.2(d) of the CEQA Guidelines requires that EIRs include an evaluation of potential growth inducement impacts to “Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” This can include projects which remove obstacles to population growth, such as through the provision of expanded public utility capacity that may allow additional construction in the associated service area (e.g., the major expansion of a wastewater treatment plant). The referenced CEQA Guidelines section also notes that “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” The City’s CEQA Significance Determination Threshold Guidelines provide additional direction on this issue, noting that growth inducement:

...is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly which may result in the construction of major and new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment...the analysis must avoid speculation and focus on probable growth patterns or projections.

The General Plan PEIR (2008c) notes that: “The population in San Diego will grow whether or not the Draft General Plan is adopted...” although a number of associated policies are in place to “...encourage business, education, employment and workforce development...preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses...and facilitate expansion and new growth of high quality employment opportunities in the City.” The General Plan incorporates the previously adopted City of Villages strategy, which notes that a “village” is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact, mixed-use areas that are pedestrian-friendly and linked to the regional transit system” (City 2008a). Implementation of the City of Villages strategy relies on the future designation and development of village sites through comprehensive community plan updates. This strategy, as implemented through the General Plan goals and policies, is designed to provide a framework to manage and plan for future population growth in the City. Pursuant to California Government Code Section 65300, the General Plan provides a comprehensive and long-term strategy to manage and address future growth in the City, with such growth to be accommodated primarily in existing urban areas or mixed-use villages, such as the BASASP area.

Future development as realized under the proposed project is referred to as build out. The proposed project does not specify or anticipate when build out would occur, as long-range demographic and economic trends are difficult to predict. However, for facility planning, technical evaluation, and environmental review purposes for this PEIR, build-out is assumed to occur in 2035, and future land use assumptions have been made.

SANDAG provides forecasts data for the San Diego region, as well as specific planning jurisdictions, such as the City and a community plan area. The SANDAG Series 13 Forecast is the most recently available forecast which starts with year 2012, and then forecasts housing, population, and employment trends for 2020, 2035, and 2050. The data from 2012 and 2035 were chosen to illustrate project conditions as generally reflecting the beginning of the planning period and the buildout year as represented by the proposed BASASP, respectively.

The SANDAG Series 13 Regional Growth Forecast shows a citywide household population of 1,611,904 in 2035, up from the household population of 1,270,659 in 2012, which represents an increase of 341,245 individuals. SANDAG forecasts residential dwelling units to increase overall from 2012 projections of 518,137 to 640,668 in 2035; an increase of 122,531 over the same planning year period.

The proposed project would change land uses (and increase residential density) in the community of Pacific Beach. The Pacific Beach Community Plan area, Series 13 Forecast shows the 2012 household population at 40,155 people and dwelling units at 22,052; projected to increase to a population of 48,505 and a total residence number of 25,605 in 2035. A January 1, 2016 snapshot of the Pacific Beach Community Plan area demographic and socio-economic estimates indicates that the Pacific Beach Community Plan area is moving toward these projections. Total housing units were shown as 22,120 (up by 68 from 2012 projections) and total population was 45,485, up from 40,155 (refer to Table 5.12-2). The BASASP area currently has a total of 763 homes (672 multi-family units and 91 single family units).

7.2 The BASASP

The proposed BASASP is a comprehensive planning document designed to provide a policy framework and supplemental development regulations to guide public and private TOD and multi-modal improvements adjacent to the Balboa Avenue Station consistent with the City's General Plan "City of Villages" planning strategy. The trolley station, located within the southeast quadrant of the BASASP area, is a separate action, and is part of the San Diego MTS Blue Line Trolley line extension from downtown San Diego to the University community that traverses the BASASP area. This major regional transit route is currently under construction and service is anticipated to begin in 2021.

As described in Chapter 2 of this PEIR, the BASASP area is approximately 210 acres (0.33 square miles) in size and is sited just north of Mission Bay Park and east of the Rose Creek corridor, which provides an open space connection within the area. I-5 trends north-south through the middle of the BASASP area and is the boundary between the Pacific Beach community on the west and the Clairemont Mesa community on the east. Figure 1-2 in this PEIR depicts the intensity of the surrounding development to the north, west, and east; the permanent open space located to the south (and along the western boundary of the BASASP as part of Rose Canyon); and the intensive nature of existing transportation facilities in the immediate vicinity. The BASASP area is bisected not only by I-5, but also contains the major thoroughfares of Morena Boulevard, Santa Fe Street, Grand Avenue, Balboa Avenue, and Garnet Avenue. The railroad tracks within the LOSSAN corridor cross the BASASP area east of I-5 and the light rail extension noted above is located adjacent to those tracks. Residential uses are located in the western-most portion of the BASASP area, and existing industrial/ commercial businesses are aligned along Santa Fe Avenue and Mission Bay Drive. Additional residential and institutional uses are located immediately east of the BASASP area in

Clairemont Mesa. The overall area can therefore be categorized as a developed urban setting that already contains major infrastructure to access and serve the area.

Proposed land uses included in the BASASP include Residential (15-54 du/ac), Community Village (up to 73 du/ac and up to 109 du/ac), Light Industrial, and Flood Control/Open Space, as well as the Balboa Avenue Station and public rights-of-way. The proposed BASASP supports the City of Villages strategy through a number of related policies in the Land Use, Mobility, Urban Design, and Recreation Chapters relevant to the Pacific Beach portion of the BASASP area (refer to Section 5.1, *Land Use*).

Specifically, these include efforts to provide mixed-use development that would integrate land uses (diverse, balanced, and affordable housing; jobs; shopping; schools; and recreation); foster pedestrian activity through paseos and pedestrian nodes; enhance pedestrian, bicycle, and transit facilities and opportunities through improvements to connectivity and safety (completing broken linkages, widening sidewalks, upgrading trails, implementing physical barriers along cycle tracks, implementing traffic calming measures, implementing enhanced pedestrian crossing at signalized intersections, installing lighting and signage, etc.); and encourage higher intensity infill development within walking distance to transit stations (within TPAs). The proposed BASASP also includes design elements and policies relevant to visual interest and structure massing, pedestrian-oriented frontages, parking type and location, location and visual shielding of ancillary areas (utilities, storage, refuse, service and loading access, mechanical equipment, etc.), landscaping, and signs. Enhancement of connectivity to Rose Creek and Mission Bay, and the provision of park and recreation facilities through implementation of the LDC regulations are also included.

As described in the BASASP Chapter 7, *Conservation*, the proposed BASASP would promote sustainable development, building practices, and landscapes to reduce dependence on non-renewable energy sources and natural resources. The proposed BASASP promotes development consistent with the General Plan and the Pacific Beach and Clairemont Mesa Community Plans' sustainability policies and supports implementation of the City's CAP through the sustainable building and development practices cited in the Urban Design and Building Design Elements. Implementation of the proposed project would focus development in an existing urbanized area with established public infrastructure and would support measures to reduce resource consumption and environmental impacts through location, design, and green building techniques (e.g., energy efficiency, water-wise practices, and runoff capture and reuse).

7.3 Inducement of Growth

7.3.1 Short-term Effects

Demand for various construction trade skills and labor would increase during the construction phases of the proposed project and during implementation of various specific projects moving forward under the proposed project. It is anticipated that this demand would be met by the local labor force and would not require importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing in the BASASP area.

7.3.2 Long-term Effects

The proposed project assumes modified land use assumptions within the Pacific Beach portion of the BASASP area only, as follow: a total of 4,729 dwelling units and up to 1037,757 square feet of non-residential uses. Changes from current planned growth resulting from implementation of the proposed project would occur only in the Pacific Beach Community Plan/LCP area, as that is the only area affected by modifications to BASASP zoning, and as described above. The 210-acre BASASP area addresses approximately eight percent of the 2,611-acre Pacific Beach Community Plan/LCP area, overall. Currently there are 763 residential dwelling units and 902,645 square feet of non-residential uses.

Also, as indicated by the above numbers, SANDAG population projections for the BASASP area indicate that population will increase over time, regardless of whether or not the proposed project is implemented. The density of development in this specific area would change. To accommodate the densification of commercial, light industrial, and residential uses, the proposed BASASP would re-designate some existing industrial and commercial areas to permit residential uses and would increase the density of certain residential areas in accordance with City's General Plan City of Villages strategy.

Total housing stock ~~also~~ would also be increased compared to both existing levels and the number of units forecasted under the adopted Pacific Beach Community Plan. That overall area was forecasted to have 25,605 dwelling units by 2035 in the SANDAG Series 13 Regional Growth Forecast, including 6,142 single-family residences and 19,463 multi-family residences. As shown in Table 7.1, *SANDAG Series 13 Forecast – Housing Units by Structure Type Pacific Beach Community Plan Area*, ~~these~~ these numbers vary from 2012 (a total dwelling unit count of 22,052, with 8,429 single-family, and 13,623, multi-family, respectively), indicating a community-wide forecasted decrease in single-family and an increase in multi-family homes in Pacific Beach.

Table 7-1
SANDAG SERIES 13 FORECAST – HOUSING UNITS BY STRUCTURE TYPE
PACIFIC BEACH COMMUNITY PLAN AREA

			2012 to 2035 Change	
	2012	2035	Numeric	Percent
Total Housing Units	22,052	25,605	3,553	14%
Multi-family	13,623	19,463	5,840	30%
Single Family	8,429	6,142	-2,287	-27%

Based on the adopted Pacific Beach Community Plan there could be 1,221 residential dwelling units within the 210-acre BASASP area. The BASASP area could have a total of 4,729 dwelling units under the proposed project, which is an increase of 3,508 dwelling units above the adopted Pacific Beach Community Plan at 2035. Within the overall Pacific Beach Community Plan area, the additional 2,888 units would comprise approximately eight percent of the Community Plan population. The increase would be in proximity to the Balboa Avenue Station and I-5, and therefore would place these residences in proximity to primary transportation modes, as well as job opportunities (including those resulting from the commercial and light industrial densification provided by the proposed BASASP).

Pursuant to the General Plan, population and housing growth will occur in the City with or without implementation of regional or local planning efforts. The 3,508 additional residential units proposed under the BASASP would comprise about two percent above the projected residential growth (122,531 total housing units change from 2012 numbers) in the City by 2035. Based on the described conditions and considerations, the proposed BASASP would provide comprehensive planning to manage and accommodate future population and related housing growth, while also addressing commercial options and employment proximity, with anticipated reductions in area-wide trips, envisioned under the City of Villages strategy.

The proposed BASASP would therefore support anticipated citywide long-term growth through redevelopment of the site to include the additional dwelling units and non-residential uses described above. Implementation of the proposed project would create additional part-time and full-time employment, involving a wide variety of jobs ranging from low to high wage scales. None of the anticipated uses, however, are expected to require the importation of a specialized work force. Rather, it is expected that the labor pool within the BASASP area/City would be adequate. While the proposed BASASP has the potential to foster economic growth in this area for the City, it is expected to have a limited effect on regional population growth because it would draw from the local population for jobs. The proposed BASASP would not directly or indirectly increase population growth in the region but would rather support growth already anticipated in regional projections. No significant pressure on local housing supply or demand outside the BASASP area is expected to result from implementation of the proposed project.

7.4 Conclusion

The BASASP area is currently developed and is designated for urban uses and surrounded by existing and planned urban development and infrastructure. Implementation of the proposed project would not require the extension or expansion of roadways, public services, utilities, or infrastructure into areas currently without service. It also would not tax existing community service facilities such that construction of new facilities would be required (see discussion in Section 5.14 of this PEIR). It would be compatible with long-range plans for regional transit through the provision of upgraded connections to the Balboa Avenue Station and the associated extension of the Blue Line Trolley line. As a result, development of the BASASP area would not remove physical barriers to growth.

The proposed BASASP includes a number of planning, design, and implementation strategies intended to accommodate growth projections within the BASASP area. Through these efforts, the proposed BASASP would allow an appropriate balance of managed population, housing, and economic growth to accommodate community development while supporting transit at the Balboa Avenue Station (and by extension citywide) while maintaining related community and environmental standards.

No changes to land use designations or zoning are included for areas outside the BASASP area, and these developed uses are expected to remain largely similar to their existing make-up as a result. Therefore, growth inducement impacts would be less than significant as a result of implementation of the proposed project.

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8.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Based upon the initial environmental review, the City determined that adoption of the proposed project would not have the potential to cause significant impacts associated with the following issue areas.

8.1 Agriculture and Forestry Resources

8.1.1 Agriculture

The City's CEQA Significance Determination Thresholds (City 2016a) state that a significant impact to agricultural resources may result from a project which involves the conversion of areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation (CDC) to non-agricultural use. The BASASP area consists entirely of Urban and Built-up Land, as mapped by the CDC (CDC 2016). As such, implementation of the proposed project would not result in the conversion of agricultural resources to non-agricultural uses.

8.1.2 Forestry Resources

The majority of the BASASP area is developed for urban uses, with no potential to support forestry resources. The undeveloped portions of the BASASP area include riparian zones associated with Rose Creek along the northwestern edge of the BASASP area, scrub and non-native grassland along the railroad ROW, and eucalyptus woodland adjacent to Morena Boulevard along the northeastern edge of the BASASP area. Though undeveloped, these areas are low in acreage and surrounded by development. As such, none of the three described areas/conditions exhibit potential to support forestry resources and implementation of the proposed project would not impact forestry resources.

8.2 Mineral Resources

The City's CEQA Significance Determination Thresholds (City 2016a) indicate that impacts to mineral resources are considered significant in areas designated as Mineral Resource Zone (MRZ-) 2 (resource present) by the California Geological Survey (CGS 1996).

The BASASP area does not include mapped MRZ-2 designations, but it includes mapped MRZ-1 (resource not present) and MRZ-3 (resource potentially present) designations (CGS 1996, City 2008a). Additionally, the BASASP area is unavailable for mining operations due to existing development. As such, the proposed project would not impact mineral resources.

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9.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS/ SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL IMPACTS

9.1 Significant and Unavoidable Impacts

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR. For the proposed project, impacts related to air quality (air quality plan consistency, construction and operations air emissions, and cumulative air emissions), historical and tribal cultural resources, noise (vibration and construction noise), paleontological resources (ministerial development), and cumulative transportation/circulation impacts (impacts to roadway segments, intersections, and freeway facilities) would remain significant and unavoidable effects of the proposed project (refer to Section 5.2, *Air Quality*, Section 5.7, *Historical and Tribal Cultural Resources*, Section 5.10, *Noise*, Section 5.11, *Paleontological Resources*, and Section 5.15, *Transportation/Circulation*, for further detail). All other significant impacts identified in Chapter 5.0 of this PEIR can be reduced to below a level of significance with implementation of the Mitigation Framework identified in Chapter 5.0, as well as through compliance with adopted General Plan and proposed BASASP policies, as well as applicable federal, state, and/or local regulations.

9.2 Significant Irreversible Environmental Impacts

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of the significant irreversible environmental changes which would occur should the proposed project be implemented. Irreversible changes typically fall into three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and cultural resources);
- Primary and secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with the proposed project.

9.2.1 Impacts Related to Nonrenewable Resources

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitment of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the proposed project would not result in significant irreversible impacts to agricultural land, forestry resources, biological resources, energy, historic resources, mineral deposits, or water bodies. Although sensitive biological resources are identified within the BASASP area which could be impacted with future development, direct and indirect impacts can be offset

through regulatory compliance (MSCP and ESL Regulations of the LDC), ~~and the Mitigation Framework identified in Section 5.3, *Biological Resources*.~~ Similarly, future development pursuant to the proposed project could impact important historic, archaeological, or tribal cultural resources given the presence of known and potential historical and archaeological resources within the BASASP area. These potential impacts can be mitigated or reduced through regulatory compliance (LDC Historical Resource Regulations) and through implementation of the Mitigation Framework further detailed in Section 5.7. Impacts to historic, archaeological, and tribal cultural resources would, however, remain significant and unavoidable. As evaluated in Chapter 8, *Effects Found Not to be Significant*, implementation of the proposed project would not result in significant irreversible impacts to agricultural, forestry, or mineral resources. Water bodies in the project area include Rose Creek, adjacent to the western BASASP boundary, and Mission Bay to the south. Implementation of the proposed project would not directly impact these water bodies. No future development is anticipated or planned within Rose Creek as it would remain as open space/flood control and Mission Bay is located outside of the BASASP area. Indirect impacts to these resources would be avoided ~~through by implementation of the Mitigation Framework identified in Section 5.3, as well as~~ compliance with regulatory requirements (as discussed in Section 5.9, *Hydrology, Water Quality, and Drainage*).

Construction of future development implemented in accordance with the proposed project would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from nonrenewable sources, such as fossil fuels, would be consumed during construction and as a result of operational lighting, heating, cooling, and transportation uses. Chapter 7, *Conservation*, of the proposed BASASP includes policies to promote sustainable development, building practices, and landscapes to reduce dependence on non-renewable energy sources and natural resources. The proposed BASASP promotes development consistent with the General Plan and the Pacific Beach and Clairemont Mesa Community Plans' sustainability policies and supports implementation of the City's CAP through the sustainable building and development practices cited in the Urban Design and Building Design Elements. Implementation of the proposed project would focus development in an existing urbanized area with established public infrastructure, and would support measures to reduce resource consumption through location, design, and green building techniques (e.g., energy efficiency, water-wise practices, and runoff capture and reuse). Additionally, the BASASP proposes to redesignate and rezone lands within the BASASP area to encourage and allow for public and private TOD in the vicinity of the Balboa Avenue Station, which could result in some reductions in the consumption of nonrenewable resources.

9.2.2 Impacts Related to Access to Previously Inaccessible Areas

The BASASP area is almost completely built out, and is currently accessible via regional transportation facilities (e.g., I-5). No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Therefore, implementation of the proposed project would not result in a significant irreversible commitment with regard to unplanned land use.

9.2.3 Impacts Related to Environmental Accidents

With respect to environmental accidents potentially associated with the proposed project, and as further discussed in Section 5.8, *Human Health/Public Safety/Hazardous Materials*, five listed hazardous materials sites are located within the BASASP area. Potential impacts related to hazardous materials and associated health hazards from implementation of the proposed project would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes.

There are no airports or related APZs located within or adjacent to the BASASP area. Montgomery Field is the nearest airport to the BASASP area, approximately four miles east to the east, and the BASASP area is not located within any mapped APZs for this (or any other) airport. Thus, the risk of aircraft-related risks to the population within the BASASP area is low.

Accidents related to flood hazards would not be significant because future development would occur outside of 100-year floodplains and all proposed BASASP development would be located outside of potential tsunami/seiche and dam inundation areas.

Potential impacts related to the impairment of or interference with adopted emergency response and evacuation plans from implementation of the proposed project would be less than significant, based on the nature of the proposed development and required compliance with associated guidelines of adopted emergency response plans and procedures.

The BASASP area is urbanized with low potential for wildfire hazards with the exception of some of the northeastern corner of the BASASP area, which is identified as within the very high fire hazard severity zone. Future development pursuant to the proposed project, however, would be subject to applicable State and City regulatory requirements related to fire hazards and prevention.

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10.0 ALTERNATIVES

CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a “reasonable range of alternatives” to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives, and avoid or substantially lessen one or more significant effects of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the proposed BASASP including:
 - Establish a transit-oriented (TOD) village that capitalizes on the trolley station investment by SANDAG and MTS;
 - Provide a plan that allows for a mix of land uses that serves residents, generates economic prosperity, and capitalizes on visitor traffic;
 - Establish a plan that encourages high density residential or mixed-use development; higher intensity employment areas, and activity centers within walking or biking distance of transit corridors and the trolley station;
 - Increase the supply and variety of housing types - affordable for people of all ages and income levels - in areas with frequent transit service and with access to a variety of services;
 - Focus development in an area where there is available public infrastructure and transit;
 - Increase mobility for pedestrians, cyclists, transit users, and automobiles through improved linkages at key points, with a strong pedestrian focus;
 - Identify key mobility improvements to facilitate connections within and through the project area, as well as to surrounding areas.
 - Identify design criteria for urban public spaces, such as mini-parks, plazas, promenades, and venues that support a variety of events and gatherings;
 - Expand access to park and recreation facilities within and adjacent to the BASASP area, including trail options and joint use opportunities, to promote a healthy, active community;

- Incorporate sustainability practices, policies, and design features into projects within the BASASP area that reduce greenhouse gas (GHG) emissions; and
 - Craft a clear and practical implementation strategy for properties and improvements within the BASASP area.
- The extent to which the alternative would avoid or substantially lessen any of the significant direct and/or cumulative environmental effects of the BASASP including:
 - Air Quality (direct and cumulative);
 - ~~Biological Resources (direct);~~
 - Historical and Tribal Cultural Resources (direct and cumulative);
 - Noise (direct);
 - Paleontological Resources (direct and cumulative); and
 - Transportation/Circulation (direct and cumulative).
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, General Plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers the following project alternatives:

- No Project Alternative: Adopted Community Plans; and
- Medium Density Alternative.

General descriptions of the characteristics of each of these alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the proposed BASASP, are provided in the following subsections. Table 10-1, *Comparison of Proposed Project Impacts with Impacts from the Project Alternatives*, provides a side-by-side summary comparison of the potential impacts of the alternatives to the impacts of the proposed BASASP.

**Table 10-1
COMPARISON OF PROPOSED PROJECT IMPACTS
WITH IMPACTS FROM THE PROJECT ALTERNATIVES**

Notes							
LS = Less than significant		SU = Significant and unavoidable		= = equal to proposed project			
SM = Significant and mitigated		+ = <i>more than proposed project</i>		- = less than proposed project			
Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Air Quality	Regional Air Quality Plan Conformance	SU	SU	LS	LS	SU (-)	SU (-)
	Construction Emissions	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Operation Emissions	SU	SU	SU (-)	SU (-)	SU (-)	SU (-)
	Sensitive Receptors	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Odors	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
Biological Resources	Sensitive Species	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Sensitive Habitats	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Wetlands	LS	LS	SM	LS (=)	LS (=)	LS (=)
	Wildlife Movement	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Conservation Planning	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Edge Effects	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Policy Conformance	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Invasive Species	SM	LS	SM (=)	LS (=)	LS (=)	LS (=)
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Tribal Cultural Resources	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)

**Table 10-1 (cont.)
COMPARISON OF PROPOSED PROJECT IMPACTS
WITH IMPACTS FROM THE PROJECT ALTERNATIVES**

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Noise	Regulatory Conformance	SM	LS	SM (=)	LS (=)	SM (-)	LS (=)
	Noise Levels	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Vibration	SU	LS	SU (-)	LS (-)	SU (-)	LS (-)
	Construction Noise	SU	LS	SU (=)	LS (=)	SU (=)	LS (=)
Paleontological Resources	Sensitive Formations	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
Transportation/ Circulation	Alternative Mode Trips	LS	LS	SU (+)	SU (+)	SU LS (+)	SU LS (+)
	Alternative Transportation	LS	LS	SU (+)	SU (+)	LS (-)	LS (-)
	Road Segments, Intersections, and Freeway Facilities	SU	SU	SU (+)	SU (+)	SU (-)	SU (-)

10.1 No Project Alternative: Adopted Community Plans

10.1.1 Description

Under the No Project Alternative, development would continue to comply with the Adopted Community Plans (i.e., the Pacific Beach Community Plan and the Clairemont Mesa Community Plan). The Pacific Beach Community Plan and the Clairemont Community Plan would not be amended nor would the underlying zones be changed, as compared to the proposed BASASP project. As such, the Pacific Beach Community Plan and zoning would not encourage higher density mixed use development that is transit-oriented. Similar to the proposed project, the Adopted Community Plans would not affect any land uses or zoning in the Clairemont Mesa Community Plan area. Unlike the proposed BASASP, the Adopted Community Plans acknowledges the concepts of transit corridors and transit-oriented development but does not fully embrace the principles of the City of Villages Strategy outlined in the General Plan, due to the fact that the formulation of the Adopted Community Plans preceded these planning concepts. As a result, development in accordance with the Adopted Community Plans would not include the BASASP's village concept, wherein mixed-use development would enable the integration of commercial and residential uses nor would it direct new high-density development to the areas near the trolley station at Balboa Avenue. In addition, the No Project Alternative would not embrace the multi-modal transportation network that would be established by the specific proposals contained in the Mobility chapter of the BASASP. The Clairemont Mesa Community Plan mobility network would maintain Balboa Avenue as a 6-lane Major roadway and Morena Boulevard as a 4-lane Major roadway and would not include

multi-modal roadway improvements, such as the cycle track to facilitate greater bicycle connectivity as identified in the BASASP.

The land use designations associated with the Adopted Community Plans are illustrated in Figure 5.1-1. Table 10-2, *Comparison of Future Land Uses*, identifies the ultimate development potential under the Adopted Community Plans, and compares that condition with that of the proposed BASASP (and the Medium Density Alternative). Future development realized under the adopted land use maps is referred to as buildout. The BASASP does not specify or anticipate when buildout will occur, as long-range demographic and economic trends are difficult to predict. However, for facility planning, technical evaluation, and environmental review purposes, buildout is assumed to occur in 2035. Furthermore, the land use designation of a site alone does not mean that a site will be developed or redeveloped with that use during the planning period, as most development will depend on property-owner initiative. Thus, the predicted buildout may be lower than what would be theoretically possible based on land area and density allowances.

The primary land use changes associated with the proposed BASASP in comparison with the Adopted Community Plans are outlined below. Retaining the Adopted Community Plans would eliminate a number of land use designations and zoning changes associated with the proposed BASASP that are needed to provide the framework for establishing an urban village in the vicinity of transit. The major land use changes proposed in the BASASP that would not occur under the No Project Alternative are as follows and are based on a visual comparison of Figures 2-1 and 3-1 in this PEIR:

- The adopted regional commercial designated areas north of Damon Avenue would not be redesignated for Community Village uses;
- The adopted regional commercial and visitor commercial areas fronting Mission Bay Drive would not be redesignated as Community Village;
- The adopted regional commercial and visitor commercial area between Bunker Hill Street and Rosewood Street between Mission Bay Drive and I-5 would not be redesignated Community Village (with a residential density up to 109 du/ac);
- The community commercially-designated areas along Garnet Avenue (west of Mission Bay Drive) would not be redesignated for Community Village;
- The western residential area between Garnet and Grand Avenue (bounded by Rose Creek Trail and Mission Bay Drive) would not change from its current density (up to 29 du/ac) to a higher density (up to 54 du/ac);
- Specific proposals in the BASASP to improve mobility and multi-modal access – including the shared multi-use path identified along Mission Bay Drive and Garnet Avenue – to transit are not in the Adopted Community Plans.

As illustrated in Table 10-2, the Adopted Community Plans would be expected to result in fewer residential units than the proposed BASASP. Specifically, a total of 1,221 dwelling units would be expected at buildout under the Adopted Community Plans, compared to 4,729 dwelling units for the proposed BASASP. The number of single-family dwelling units would be slightly more under the

Adopted Community Plans, but down from existing levels (refer to Table 5.1-1). Both the Adopted Community Plans and the proposed BASASP call for an increase in multi-family dwelling units; however, the proposed BASASP calls for a greater number of units and at higher densities than anticipated in the Adopted Community Plans. Unlike the proposed BASASP, future residential units under the Adopted Community Plans would be located predominantly in dedicated residential areas rather than integrated with the mixed-use (commercial village) developments. That is, only 468 dwelling units would occur within commercial areas under the Adopted Community Plans, compared to 3,832 dwelling units for the proposed BASASP (refer to Table 10-2).

Without the need to accommodate more multi-family development in the commercial areas as noted, the Adopted Community Plans would have 11 fewer acres devoted to commercial uses than the proposed BASASP. Lastly, the Adopted Community Plans would not encourage the construction of residential above or behind ground floor commercial space and parking would be allowed on the street in front of commercial uses.

Without the policies expressed in the Urban Design Chapter of the overall and individual character of the community would not be enhanced in a comprehensive fashion. Finally, the Adopted Community Plans does not have provisions for wayfinding, with a particular focus on connections to the Balboa Avenue Station.

**Table 10-2
COMPARISON OF FUTURE LAND USES**

Land Use Type	Proposed BASASP			No Project Alternative: Adopted Community Plans			Medium Density Alternative		
	Acres	Floor Area (SF)	Dwelling Units	Acres	Floor Area (SF)	Dwelling Units	Acres	Floor Area (SF)	Dwelling Units
Single-Family	0	0	0	6	0	87	0	0	0
Multi-family	18	0	897	15	0	666	18	0	653
Commercial	49	570,721	3,832	38	494,057	468	49	570,721	3,513
Light Industrial	4	114,698	0	7	223,798	0	4	114,698	0
Office	2	43,192	0	4	115,339	0	2	43,192	0
Self-Storage	8	308,746	0	8	308,746	0	8	308,746	0
Parking Lot – Surface	0	0	0	3	0	0	0	0	0
Flood Control/Open Space	2	0	0	2	0	0	2	0	0
Transportation/Right-of-way	117	400	0	117	400	0	117	400	0
Communications and Utilities	10	0	0	10	0	0	10	0	0
Vacant and Undeveloped Land	0	0	0	0.06	0	0	0	0	0
TOTALS	210	1,037,757	4,729	210	1,142,340	1,221	210	1,037,757	4,167

SF = square feet

10.1.2 Environmental Analysis

10.1.2.1 Air Quality

Implementation of the Adopted Community Plan_s under the No Project Alternative would bring the same amount of residents into the BASASP area as planned in the SANDAG projections. In contrast to the proposed BASASP evaluated in Section 5.2, *Air Quality*, the land uses and related emissions from housing and employment identified in the current Regional Air Quality Strategy (RAQS) are those anticipated in the No Project Alternative, thus, significant direct and cumulative air quality impacts related to conformance with the RAQS would be avoided by this alternative.

Future development pursuant to the No Project Alternative would generate criteria pollutants in the short term during construction (similar to the proposed project). As with the proposed BASASP, the exact number and timing of individual development projects that would occur are unknown at this time; therefore, project-level emissions estimates cannot be determined at the program level and individual projects could exceed SDAPCD screening thresholds. Therefore, similar to the BASASP, the No Project Alternative could result in potentially significant and unavoidable impacts related to construction emissions which would have the potential to be equivalent to those of the proposed project.

With regard to operational emissions, which were determined to be significant and unavoidable for the proposed BASASP, operational regional VOC (an ozone precursor), PM₁₀, and PM_{2.5} emissions of the No Project Alternative could exceed the SDAPCD's Screening Level Thresholds. Because it cannot be demonstrated at the programmatic level that future development under the No Project Alternative would not exceed applicable air quality standards, the project's impacts would be considered cumulatively considerable and significant under the No Project Alternative as well. It should be noted, however, that the volume of criteria pollutant emissions generated by the No Project Alternative would be much less than those of the BASASP because the mobile source emissions (i.e., generated by vehicles) would have the potential to be substantially less since there would be a 45% reduction in ADT realized under the Adopted Community Plan_s compared to the BASASP. Indirect operational emissions associated with energy usage would also be less than the BASASP as the number of residential units and commercial space would also be substantially less than the proposed project. Thus, the No Project Alternative's impacts from criteria pollutants would be significant and unavoidable but reduced from levels anticipated under the BASASP.

As stated in Section 5.2 of the PEIR, no potential was identified for traffic-related CO hot spots from the proposed BASASP; resulting in a less than significant exposure of sensitive receptors to substantial, project-generated, local CO emissions resulting from hot spots. With less traffic generated within the BASASP area under the No Project Alternative, this less than significant impact would be reduced. The same less than significant impact due to TACs would exist for the No Project Alternative given the proximity of residentially-zoned land to the freeway. However, the TACs impacts would be less under this alternative due to the reduced residential densities associated with the Adopted Community Plan_s and the fact that zoning adjacent to I-5 would remain commercially focused (CC-4-2) as compared to residential (RM-4-10) as compared to the BASASP.

Potential impacts related to odors from implementation of the proposed BASASP are identified as less than significant in Section 5.2 of this PEIR, based on the following considerations: (1) there are

no known sources of long-term odors in the BASASP area; (2) there are no agricultural operations in the BASASP area which could potentially generate odors; and (3) development under the proposed BASASP is not expected to result in land uses that would produce objectionable odors. Similar less than significant impacts would be expected under the No Project Alternative.

10.1.2.2 Biological Resources

The majority of the BASASP area is developed and does not contain sensitive resources, as described in Section 5.3, *Biological Resources*. The exception is the open space area associated with Rose Creek and some limited undeveloped land. While the No Project Alternative would result in generally lower development intensity than the proposed BASASP (refer to Table 10-2), it would allow for development/disturbance in similar areas adjacent to the Rose Creek open space and its sensitive resources. Accordingly, the No Project Alternative would be expected to result in similar significant impacts to biological resources, as described for the proposed BASASP, including direct and indirect effects to sensitive species and sensitive habitats. However, the No Project Alternative has a greater potential to result in impacts to wetlands because of policies within the proposed BASASP that prohibit development within wetland areas. As noted for the proposed BASASP, detailed analyses of individual development projects would be required, and mitigation measures identified in the mitigation framework associated with the proposed BASASP would be implemented on a project-level. All proposed development under the No Project Alternative, as well as the proposed BASASP, adjacent to the MHPA would be required to comply with the MSCP Land Use Adjacency Guidelines and related mitigation, as described in Section 5.3, to prevent MHPA edge effects. Thus, the potential impacts of the No Project Alternative to sensitive species and habitat would be less than significant (with mitigation incorporated) as with the proposed BASASP.

Similar to the proposed BASASP, the No Project Alternative would be expected to result in potentially significant, but mitigable, impacts related to conservation planning and introduction of invasive species, as described in Section 5.3.

The No Project Alternative would also be expected to result in less than significant impacts for issues related to wildlife movement and conflicts with local policies/ordinances, for similar reasons as noted for the proposed BASASP in Section 5.3 of the PEIR. Specifically, implementation of subsequent development project submittals under the No Project Alternative would be required to adhere to applicable federal, state, and local regulations regarding the protection of biological resources, as described in Section 5.3 (similar to projects implemented under the proposed BASASP). Significant impacts to biological resources would not occur under this alternative.

10.1.2.3 Historical and Tribal Cultural Resources

Impacts to historical and tribal cultural resources under the No Project Alternative would be similar to those identified for the proposed BASASP, as the extent and area of disturbance from associated development would be generally the same, with some variations in land use intensity. As with the proposed BASASP, this alternative would not propose any specific development, demolition, or alteration of existing historic resources. However, given the presence of known and potential historical and archeological resources within the community, future development pursuant to the No Project Alternative could have a significant impact on important historic, archaeological, or tribal

cultural resources, including, but not limited to, the village of Rinconada, Trade Winds Motel Sign, or Chase Bank building.

Future development implemented in accordance with the No Project Alternative or the proposed BASASP would be required to comply with applicable City, federal, state, and local regulations regarding the protection of historic buildings, structures, objects, or sites, as described in Section 5.7, *Historical and Tribal Cultural Resources*. However, the ability of Mitigation Measure HIST-1 to adequately protect significant historic structures cannot be assured at the program level and impacts associated with the No Project Alternative would be considered significant and unmitigated, similar to the proposed BASASP.

According to the City's Historical Resources Guidelines, potential impacts to significant resources, including archaeological, or tribal cultural resources; religious or sacred uses; and human remains would be considered potentially significant. Implementation of Mitigation Measure HIST-2 identified in Section 5.7 requires a series of actions prior to issuance of any permit for future development that could directly affect an archaeological or tribal cultural resource. Implementation of actions pursuant to Mitigation Measure HIST-2 and compliance with CEQA and PRC Section 21080.3.1 requiring tribal consultation, would reduce impacts to archaeological resources. The ability of this measure to adequately protect significant archaeological and tribal cultural resources, however, cannot be assured at the program level. Like the proposed BASASP, impacts associated with the No Project Alternative would be considered significant and unmitigated.

The No Project Alternative would not lessen the potential for significant and unmitigated impacts to historical and tribal cultural resources within the BASASP area.

10.1.2.4 Noise

Future development under the Adopted Community Plans could be affected by traffic noise levels that are not in conformance with City standards. Specifically, project-related traffic would potentially expose new development to noise levels at exterior use areas or interior areas in excess of the Land Use – Noise Compatibility Guidelines established in the City's Noise Element and the Noise Ordinance standards. Less than significant noise impacts from rail noise and stationary noise sources are expected for the proposed BASASP. Similar conditions would occur under the No Project Alternative.

Similar to development under the proposed BASASP, the potential noise impacts related to the No Project Alternative would be less than significant with implementation of the mitigation framework, and compliance with local, state, and federal noise control regulations. According to the noise analysis contained in Section 5.10, *Noise*, although noise levels throughout the BASASP area would generally increase in the future with implementation of the proposed BASASP, many segments, including Balboa Avenue, Grand Avenue, and Morena Boulevard would see reduced traffic and, therefore, lower traffic noise levels. However, as shown on Table 5.10-5, BASASP-related exterior noise impacts would be less than a 3 dBA increase, or exterior noise levels of 65 dBA would be maintained. Similar conclusions are, therefore, reached with the No Project Alternative with the reduction in land use intensity contributing even less traffic-related noise to the BASASP area. Future development projects under the No Project Alternative would be required to adhere to applicable federal, state, and local noise control regulations similar to projects implemented under the

proposed BASASP. Similar less than significant impacts would be expected under the No Project Alternative.

Similar to the proposed BASASP, the No Project Alternative would permit infill development in close proximity to vibration sources and would require construction noise in close proximity to noise-sensitive land uses. The No Project Alternative would therefore also result in significant and unavoidable vibration and construction noise impacts.

10.1.2.5 Paleontological Resources

As with the proposed BASASP, future development under the No Project Alternative has the potential to result in significant direct impacts to paleontological resources. Implementation of future projects under the No Project Alternative would require adherence to all applicable guidelines, as described in Section 5.11, *Paleontological Resources*. The significance of impacts to paleontological resources from implementation of the No Project Alternative would be similar to those identified for the proposed BASASP because the areas of development-related disturbance would generally be the same (with associated changes to land use designations/zoning). As with the proposed BASASP, potentially significant impacts to paleontological resources at the project level would require strict adherence to the mitigation framework outlined in Section 5.11, and implementation of those measures would reduce potential impacts to less than significant for future discretionary development. Like the proposed BASASP, impacts related to future ministerial development that would occur under the No Project Alternative would remain significant and unavoidable because there is no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring.

10.1.2.6 Transportation/Circulation

None of the specific pedestrian, bicycle, and transit-related improvements recommended by the proposed BASASP would be implemented under the No Project Alternative. Therefore, minimal improvement to alternative transportation connectivity and accessibility would occur and the percent of alternative mode trips in the City's transportation system would not be expected to change in the future. The No Project Alternative would not result in adverse impacts to alternative transportation modes, but it would not improve the use of transit within the BASASP area. Likewise, no new/enhanced alternative transportation opportunities would be planned within the BASASP area. Thus, improvements to alternative transportation connectivity and accessibility would not occur and the No Project Alternative would not specifically implement the policies, plans, or programs supporting alternative transportation modes identified in the General Plan. Without specific recommendations to create a robust, multi-modal network that encourages walking, bicycling, and using transit, the BASASP area would continue to have gaps in the sidewalk and bicycle network that would prevent the connections needed to fully take advantage of the future transit operations in the BASASP area.

As described in Section 5.15, *Transportation/Circulation*, implementation of the proposed BASASP would result in cumulatively significant impacts to a number of local intersections, roadway segments, and freeway facilities. Based on the analysis in the TIS, the Adopted Community Plans would produce 31,032 daily trips (which is a 24,593 trip reduction from proposed traffic volumes). Traffic impacts under the No Project Alternative, which is identified as the Adopted Future Year

Buildout condition in Section 5.15 of this PEIR and in the TIS contained in Appendix K to the PEIR, would result in impacts at the same intersection locations in the study area as in the BASASP area. Based on the roadway segment analysis performed on the Adopted Community Plans, this alternative would result in similar impacts; the proposed project would result in significant cumulative impacts to 11 roadway segments (three segments of Garnet Avenue, one segment of Balboa Avenue, six segments of Mission Bay Drive, and one segment of Clairemont Drive) and the No Project Alternative would result in significant cumulative impacts to 10 roadway segments (four segments of Garnet Avenue, three segments of Balboa Avenue, two segments of Mission Bay Drive, and one segment of Clairemont Drive) as noted in Table 9-2 in PEIR Appendix K). Freeway facility impacts would be less than those of the project but still significant and unavoidable under the No Project Alternative (as noted in Table 9-3 in PEIR Appendix K).

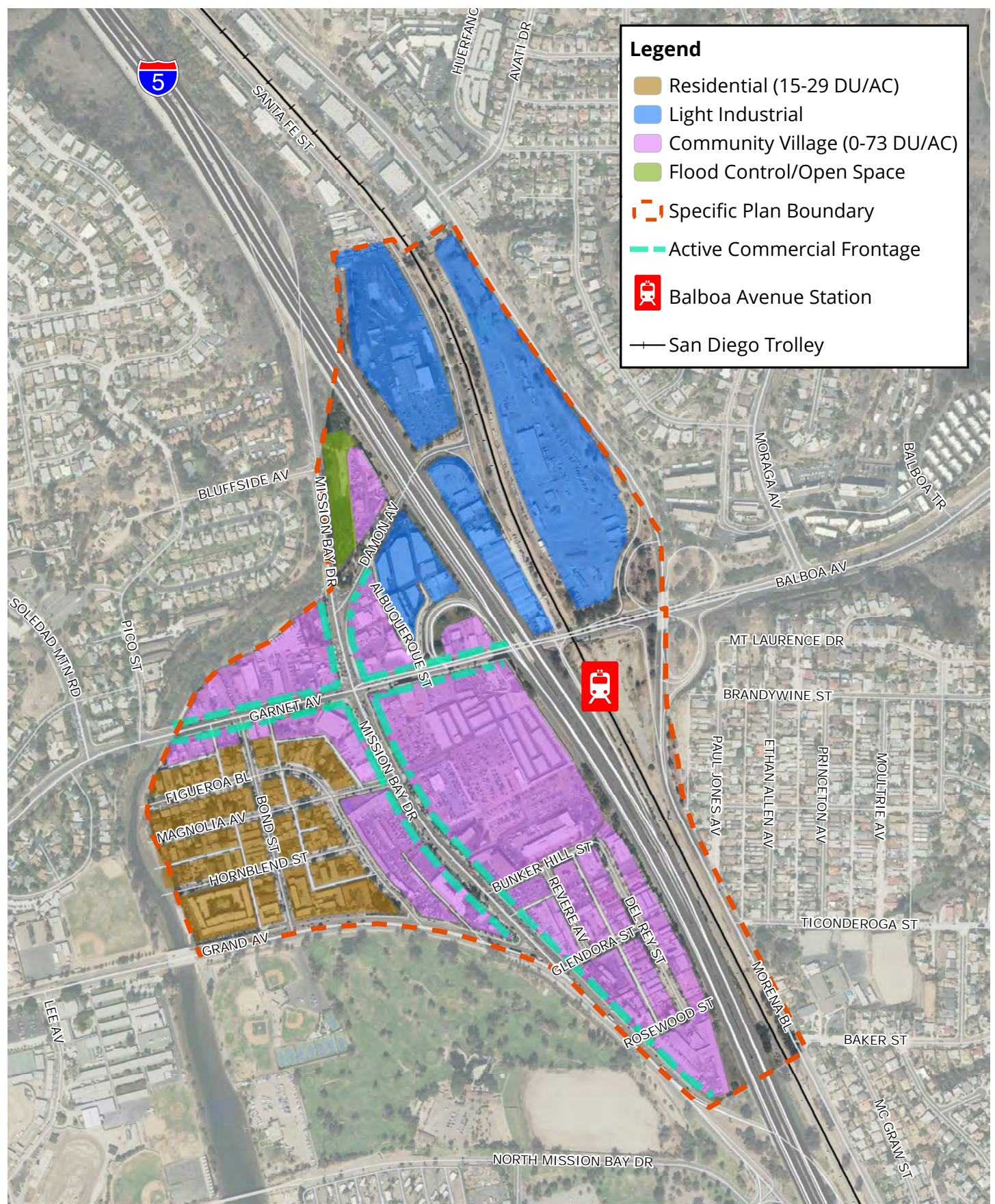
Potential impacts to local roadway segments, intersections, and freeway facilities under the No Project Alternative would be less than those under the proposed BASASP because this alternative would result in 24,593 less daily traffic trips. However, in certain impacted intersection locations, the projected delay would be slightly greater than in the future under the No Project Alternative (see Table 9-1 in PEIR Appendix K). Likewise, higher daily volumes at impacted roadway segments, such as Garnet Avenue between Mission Bay Drive and I-5 Southbound Ramp, would occur under the No Project Alternative.

The No Project Alternative would not include specific recommendations (as under the proposed BASASP) to promote a robust, multi-modal network that encourages walking, bicycling, and using transit, while continuing to provide for needed vehicular access; and would not implement the City of Villages concept of encouraging transit-oriented development that takes advantage of the transit corridors and future trolley station, as is proposed for the BASASP. Therefore, no reduction in vehicle trips would be attributable to this alternative. Similar to the proposed BASASP, although mitigation is recommended to mitigate cumulative impacts to intersections, the cumulative impacts to roadway segments and freeway facilities are concluded to remain significant and unavoidable, as mitigation funding/implementation cannot be assured for all of the impacts.

10.2 Medium Density Alternative

10.2.1 Description

The Medium Density Alternative would be focused on reducing traffic and related impacts associated with traffic in comparison to the proposed BASASP. Reductions in traffic would be accomplished by reducing the number of residential units allowed within the BASASP area. This would be accomplished by adopting the lower density category of the Community Village (0-73 du/ac) land use designation across the area situated between Bunker Hill Street and Rosewood Street, as compared to the Community Village (0-109 du/ac) designation proposed by the BASASP (see Figure 10-1, *Medium Density Alternative*). To reduce the number of residential units, the Medium Density Alternative would eliminate the emphasis placed on increasing residential densities in land designated Residential in the western residential area and would not include the higher density Community Village designation that allows up to 109 du/ac, thereby eliminating the additional 562 residential units proposed in the BASASP (refer to Table 10-2). All other elements of the proposed BASASP would remain the same under this alternative and a General Plan amendment, Community



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Balboa Avenue Station Area Specific Plan

Medium Density Alternative

Figure 10-1

Plan Amendments (CPAs), and a rezone would still be required to implement the land use changes associated with this alternative.

10.2.2 Environmental Analysis

10.2.2.1 Air Quality

Implementation of the Medium Density Alternative would increase the amount of residents in the BASASP area as compared to the residential and employment projections by SANDAG. Similar to the proposed BASASP evaluated in Section 5.2, *Air Quality*, the land uses and related emissions from housing and employment under the Medium Density Alternative identified in the current RAQS would be greater than those anticipated in the current RAQS strategy, thus, significant direct and cumulative air quality impacts related to conformance with the RAQS would still occur under this alternative.

Future development pursuant to the Medium Density Alternative would generate criteria pollutants in the short term during construction (similar to the proposed project). As with the proposed BASASP, the exact number and timing of individual development projects that would occur are unknown at this time; therefore, project-level emission estimates cannot be determined at the program level and individual projects could exceed SDAPCD screening thresholds. Therefore, similar to the BASASP, the Medium Density Alternative could result in potentially significant and unavoidable impacts related to construction emissions which would have the potential to be equivalent to those of the proposed project.

With regard to operational emissions, which were determined to be significant and unavoidable for the proposed BASASP, operational regional VOC (an ozone precursor), PM₁₀, and PM_{2.5} emissions of the Medium Density Alternative could exceed the SDAPCD's Screening Level Thresholds. Because it cannot be demonstrated at the programmatic level that future development under the Medium Density Alternative would not exceed applicable air quality standards, the project's impacts would be considered cumulatively considerable and significant under the Medium Density Alternative as well. It should be noted, however, that the volume of criteria pollutant emissions generated by the Medium Density Alternative would be less than those of the BASASP because the mobile source emissions (i.e., generated by vehicles) would have the potential to be substantially less since there would be a seven percent reduction in ADT realized under the Medium Density Alternative compared to the BASASP. Indirect operational emissions associated with energy usage would also be less than the BASASP as the number of residential units and commercial space would also be less than the proposed project. Thus, the Medium Density Alternative's impacts from criteria pollutants would be significant and unavoidable but reduced from levels anticipated under the BASASP.

As stated in Section 5.2 of the PEIR, no potential was identified for traffic-related CO hot spots from the BASASP; resulting in a less than significant exposure of sensitive receptors to substantial, project-generated, local CO emissions resulting from hot spots. With less traffic generated within the BASASP area under the Medium Density Alternative, this less than significant impact would be reduced. The same less than significant impact due to TACs ~~need near~~ the freeway would exist for the Medium Density Alternative given the proximity of residentially-zoned land to the freeway. However, the TAC impacts would be less under this alternative due to the reduced residential densities associated with the Medium Density Alternative as compared to the proposed BASASP.

Potential impacts related to odors from implementation of the proposed BASASP are identified as less than significant in Section 5.2 of this PEIR, based on the following considerations: (1) there are no known sources of long-term odors in the BASASP area; (2) there are no agricultural operations in the BASASP area which could potentially generate odors; and (3) development under the proposed BASASP is not expected to result in land uses that would produce objectionable odors. Similar less than significant impacts would be expected under the Medium Density Alternative.

10.2.2.2 Biological Resources

The Medium Density Alternative would have a similar development footprint as the proposed BASASP, with the extent of impacts to biological resources under this alternative also similar to that described for the proposed BASASP. The amount of open space, extent of disturbance from future development, and related impacts to sensitive resources, including habitats and species, under this alternative also would be similar to the proposed BASASP. Accordingly, this alternative would be expected to result in similar significant impacts to biological resources, as described for the proposed BASASP, including effects to sensitive species and sensitive habitats. Pursuant to the analysis in Section 5.3, detailed analyses of individual development projects would be required, and mitigation would be implemented on a project level. All proposed development under the Medium Density Alternative, as well as under the proposed BASASP, adjacent to the MHPA would be required to comply with the MSCP Land Use Adjacency Guidelines, as described in Section 5.3. As a result, direct and indirect impacts to sensitive species, sensitive habitats, conservation planning, edge effects, and invasive species under the Medium Density Alternative would be reduced to less than significant levels with mitigation, similar to the proposed BASASP.

The Medium Density Alternative would be expected to result in less than significant impacts for issues including wildlife movement, conflicts with local policies/ordinances, and introduction of invasive species, for similar reasons as noted for the proposed BASASP in Section 5.3. Less than significant impacts to biological resources would occur under this alternative.

10.2.2.3 Historical and Tribal Cultural Resources

Impacts to historical and tribal cultural resources under the Medium Density Alternative would be similar to those identified for the proposed BASASP, as the extent and area of disturbance from associated development would generally be the same (with some variations in land use). As with the proposed BASASP, this alternative would not propose any specific development, demolition, or alteration of existing resources. Because the area contains known historic, archaeological, and tribal cultural resources, however, it can be assumed that future development under the Medium Density Alternative has the potential to result in significant direct impacts. According to the City's Historical Resources Guidelines, any potential impacts to significant cultural resources, including historic, archaeological, and tribal cultural resources; religious or sacred uses; and human remains would be considered significant. Implementation of Mitigation Measures HIST-1 and HIST-2 would reduce the potential impacts, but the ability of these mitigation measures to adequately protect significant historical and tribal cultural resources cannot be assured at the program level and impacts associated with the Medium Density Alternative would be considered significant and unmitigated, as with the proposed BASASP.

10.2.2.4 Noise

Noise impacts resulting from implementation of the Medium Density Alternative would be somewhat less than those identified for the proposed BASASP relative to stationary noise sources. Specifically, without the emphasis on incorporating residential development into commercial areas around transit, fewer residential units would be exposed to stationary sources such as heating and ventilation equipment and loading docks. Similarly, fewer residential units would be exposed to mobile noise sources. Eliminating the residential density in the southern portion of the BASASP area would reduce the number of residential units exposed to noise from major roadways (i.e., I-5).

Like the proposed BASASP, the Medium Density Alternative would permit infill development in close proximity to vibration sources and would require construction noise in close proximity to noise-sensitive land uses. The Medium Density Alternative would therefore also result in significant and unavoidable vibration and construction noise impacts.

10.2.2.5 Paleontological Resources

As with the proposed BASASP, future development under the Medium Density Alternative has the potential to result in significant direct impacts to paleontological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines, as described in Section 5.11. The extent of impacts to paleontological resources from implementation of the Medium Density Alternative would be similar to those identified for the proposed BASASP, because the areas of development-related disturbance would generally be the same (with associated changes to land use designations/zoning). Similar to the proposed BASASP, strict adherence to the mitigation framework identified in Section 5.11 would be required and would reduce potential impacts to less than significant for future discretionary development. Like the proposed BASASP, impacts related to future ministerial development that would occur under the Medium Density Alternative would remain significant and unavoidable because there is no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring.

10.2.2.6 Transportation/Circulation

The Medium Density Alternative would result in 562 fewer high-density residential units than the proposed BASASP. This reduction would result in a proportionate decrease in the number private automobile trips, although the decrease would be partially offset by the loss of the trip reductions anticipated with the proposed BASASP's emphasis on allowing higher density residential uses in close proximity to transit and commercial opportunities. Based on the TIS, the Medium Density Alternative would produce 52,253 daily trips (which is a 3,372 trip reduction from proposed traffic volumes).

The Medium Density Alternative would include the same policies and multi-modal recommendations as noted for the proposed BASASP to support and promote the goals and objectives of the General Plan's various elements, as discussed in Section 5.15. This alternative would result in impacts at the same intersections as the proposed project, except that it would avoid significant impacts to the Garnet Street/Olney Street intersection (see Table 9-1 in PEIR Appendix K). Roadway segment impacts would occur along the same roadway segments as the proposed project (see Table 9-2 in

PEIR Appendix K). Freeway facility impacts would be the same as the proposed BASASP and would be significant and unavoidable under the Medium Density Alternative similar to the proposed project.

Implementation of the roadway improvements identified in the mitigation framework for the proposed BASASP, which would also apply to the Medium Density Alternative, cannot be guaranteed. Consequently, as with the proposed BASASP, the cumulative impacts to roadway segments, intersections and freeway facilities within the BASASP area would be significant and unavoidable, although to a lesser degree under the Medium Density Alternative.

10.3 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, another environmentally superior alternative must be identified.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the BASASP's goals and objectives, the No Project Alternative is the environmentally superior alternative for this PEIR because overall development would be less than any of the other alternatives. The No Project Alternative does not meet the purpose and objectives of the BASASP, however, including identifying land use and mobility strategies to cohesively guide growth and development and foster walkable and transit-oriented communities.

Of the remaining alternatives, the environmentally superior alternative is the Medium Density Alternative. This alternative would reduce cumulatively significant and unavoidable impacts to transportation/circulation (intersections but not roadway and freeway segments). The Medium Density Alternative would also result in similar or reduced impact levels for issue areas determined to be significant under the proposed BASASP, including air quality, ~~biological resources~~, historical and tribal cultural resources, noise, and paleontological resources. As described for the proposed BASASP, this alternative would have cumulatively significant and unavoidable impacts related to air quality, historical and tribal cultural resources, paleontological resources and transportation/circulation.

10.4 Alternatives Considered But Rejected

CEQA *Guidelines* Section 15126.6(c) requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the proposed project objectives.

A **Mobility Improvements Alternative** was considered to reduce the environmental effects of the BASASP related to air quality, ~~biological resources~~, historical and tribal cultural resources, noise, paleontological resources, and transportation/circulation. This alternative would retain all the mobility connectivity improvements to the planned Balboa Avenue Station, as well as the other mobility improvements outlined in the BASASP. This alternative would not include any zoning or land use changes. This alternative was rejected from further consideration as it would not achieve a

majority of the project objectives, and would not be consistent with the Climate Action Plan or the General Plan's City of Villages Strategy. The primary objective of the BASASP is to establish a transit-oriented village, and removing all land use changes would not provide for the realization of this goal.

A **Low Density Alternative** was considered to reduce the environmental effects of the BASASP related to air quality, noise, and transportation/circulation. This alternative would provide a higher density than is currently permitted, but lower than the planned density of the BASASP or the Medium Density Alternative. This alternative would allow for up to 43 units per acre throughout the Pacific Beach area of the BASASP. This alternative was rejected from further consideration because the Medium Density Alternative also lowers the density from that of the BASASP, and thus, has many of the same effects on the potential impacts of the BASASP. The Medium Density would also reduce traffic and traffic-related (air quality and noise) impacts, however, it would do a better job of accomplishing the project objectives. Therefore, this alternative is not substantially different from the Medium Density Alternative, and thus, this alternative was rejected from further consideration.

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