

# 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**

<b>Letter</b>	<b>Commenter</b>	<b>Date</b>
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**

<b>Letter</b>	<b>Commenter</b>	<b>Date</b>
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

## COMMENTS

## RESPONSES



EDMUND G. BROWN JR.  
GOVERNOR

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



KEN 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  
SCRH#: 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.

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 burns 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](http://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](http://www.balboastationplan.org/draft_program_eir)

Sincerely,

---  
- *Samantha Ollinger*

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

## COMMENTS

## RESPONSES

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

J-1

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](mailto:rteran@viejas-nsn.gov) or [epingleton@viejas-nsn.gov](mailto: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

**From:** David Gonzales <davidskgonzales34@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

L-1

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 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. <b>Section 3: Project description.</b> 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	<b>Section 5: “Environmental analysis”.</b> 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 <sub>10</sub> and PM <sub>5</sub> ). 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 BASASP 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	<b>Section 6: "Cumulative impacts"</b> 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

[CBoulton@sanidiego.gov](mailto:CBoulton@sanidiego.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      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.

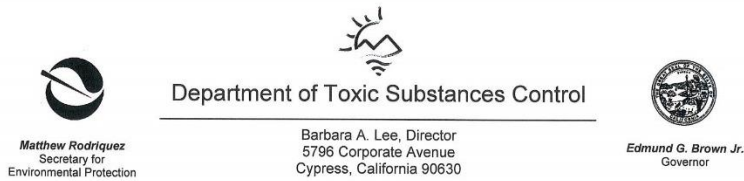
Thank you.

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@sandiego.gov](mailto:PlanningCEQA@sandiego.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  
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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  
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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](mailto: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  
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cc: Ms. Alyssa Muto (via e-mail)  
Deputy Director  
Planning Department  
City of San Diego  
[PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.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](mailto: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](mailto: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](mailto:Shahir.Haddad@dtsc.ca.gov)

CEQA# 2017071007

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## COMMENTS

## RESPONSES

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

V-1

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 #13  
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 4616 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](http://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

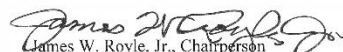
Dear Ms. Malone:

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**

Z-1

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

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.



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

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

Vista  
and  
County of San Diego

#### ADVISORY MEMBERS

Imperial County  
California Department  
of Transportation

Metropolitan  
Transit System

North County  
Transit District

United States  
Department of Defense

San Diego  
Unified Port District

San Diego County  
Water Authority

Southern California  
Tribal Chairmen's Association

Mexico

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](http://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](http://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-5

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](mailto: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

<b>1</b>	<b>Community Outreach Process</b>
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.

May 29, 2018

Page 2 of 22

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

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

- |                 |   |
|-----------------|---|
| AE-6<br>(cont.) | <p>1.2 <u>Formal Meetings have been too infrequent:</u></p> <ul style="list-style-type: none"> <li>• 2016-05-16 First Meeting. Sub-committee formation &amp; basics</li> <li>• 2016-11-02 Concepts</li> <li>• 2017-01-31 SANDAG Mobility Hubs (joint meeting with PB)</li> <li>• 2017-07-19 EIR Scoping Document revealed with some discussion</li> <li>• 2018-01-18 Draft Specific Plan revealed with some discussion</li> <li>• 2018-02-27 Draft Specific Plan public comments</li> <li>• 2018-05-09 Draft EIR 30-minutes of discussion;<br/>(Planning Dept. would only accept/answer questions in writing.)</li> </ul> |
|                 | <p>1.3 <u>The PEIR refers to non-existent "pop-up outreach events."</u> To my knowledge they have not happened in Clairemont.<br/>(Ref: PEIR Paragraph 4.2)</p>   |
|                 | <p>1.4 Thus far, community outreach seems to consist of the Planning Department revealing its own work, then defending against public comment.<br/><u>This Specific Plan should not have become adversarial</u>; there was a missed opportunity to be partners with Clairemont citizens.</p>  |
| AE-7            | <p>1.5 <u>This comment process is designed in a way that intimidates and prevents public understanding.</u><br/>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.<br/>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>   |
|                 | <p>1.4 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>   |
| AE-8            | <p>1.5 <u>The Balboa Station Area Specific Plan is not referenced in the Clairemont pages of the Planning Department's website.</u><br/>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.<br/>(Ref: Attachment 11.7)</p>  |

May 29, 2018

Page 3 of 22

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

<b>2</b>	<b>This Specific Plan has failed to meet its original project objective.</b>
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.

AE-10

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

<b>3</b>	<b>The PEIR-defined Specific Plan fails to achieve goals promised under a Sustainable Communities Planning Grant</b>
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.

## COMMENTS

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AE-11

<b>4</b>	<b>Mobility (non-personal vehicle)</b>
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"> <li>• What are MTS' intentions for operating the trolley?</li> <li>• What are MTS' intentions for bus connectivity?</li> <li>• What are MTS' intentions for neighborhood shuttles?</li> </ul>
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.

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<b>5</b>	<b>Mobility (vehicular)</b>
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.



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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.

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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.

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<b>6</b>	<b>PEIR Process Concerns</b>
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.

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<b>7</b>	<b>Permanent Removal of a Morena Boulevard Traffic Lane</b>
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

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<b>8</b>	<b>Air Pollution</b>
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

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- 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.

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<b>9</b>	<b>Other Issues</b>
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.

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<b>10</b>	<b>CONCLUSIONS &amp; RECOMMENDATIONS</b>
10.1	<p><b><u>The Balboa Avenue Station Area Specific Plan should not be approved in its current draft form.</u></b></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"> <li>• It fails to solve its primary objective.</li> <li>• It fails to expose imaginative solutions, favoring a singular pre-conceived idea.</li> <li>• It does not value the input and participation of its stakeholders.</li> <li>• It creates a partial local solution while needlessly impacting an even broader region.</li> <li>• It disguises the severity of collateral damage.</li> <li>• It exposes the decision makers to embarrassing criticism.</li> </ul> <p><b>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.</b></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-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.

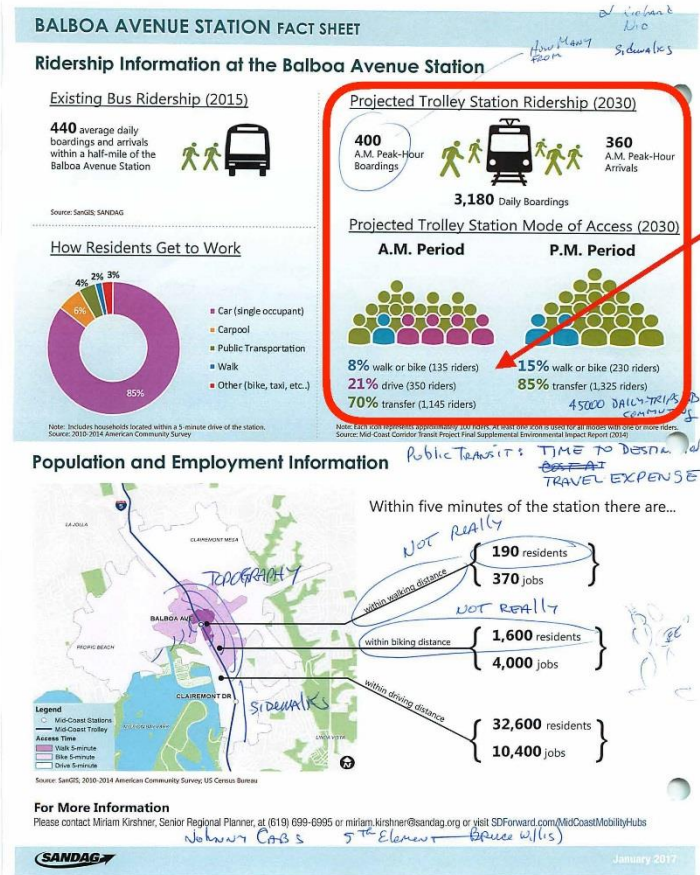
George Henderson Comments  
Balboa Avenue Station Area Specific Plan — Draft PEIR

<b>11</b>	<b>ATTACHMENTS:</b>
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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George Henderson Comments  
Balboa Avenue Station Area Specific Plan — Draft PEIR

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



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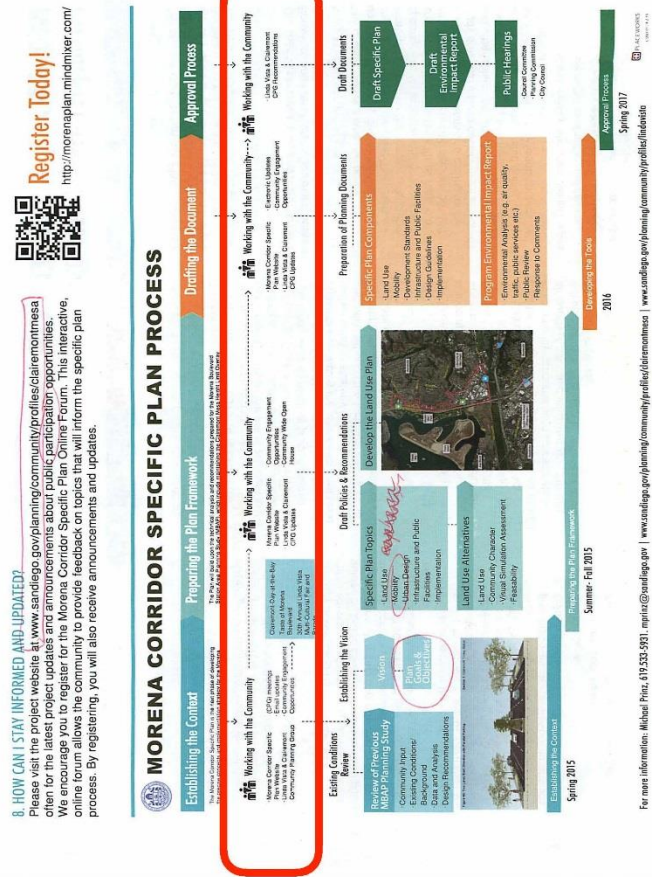
## May 29, 2018

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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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George Henderson Comments  
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, Kevin
2. Non-Agenda Public Comment (6:05) Dave	John, Kevin, Billy
3. Specific Plan Process Update (6:10)	Donna, Billy
4. Mobility Concepts (6:20)	Chris, John
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 Mournian <smournian@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, 7/18)*

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  
#51801...517.pdf

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 5:19:48 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.

AF-10

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.

AF-11

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

AF-12

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.

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 now 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](http://www.pbplanning.org)

June 8<sup>th</sup>, 2018

To: Alyssa Muto, Deputy Director, City of San Diego Planning Department  
Rebecca Malone, Environmental Planner, City of San Diego Planning Department  
[PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.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><b>Mobility:</b></p> <p>o <b>Item 3:</b> 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 <b>Item 4:</b> 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 <b>Item 5:</b> 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. <a href="https://www.sandiego.gov/vision-zero/strategic-plan">https://www.sandiego.gov/vision-zero/strategic-plan</a></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 <b>Item 6:</b> 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 <b>Item 7:</b> 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 <b>BEFORE</b> and <b>CONCURRENT</b> 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 <b>Item 8:</b> 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 <b>BEFORE</b> and <b>CONCURRENT</b> 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 <b>Item 9:</b> 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 <b>Item 10:</b> 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 <b>Item 11:</b> 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 <b>Item 12:</b> 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 <b>Item 13:</b> 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 <b>Item 14:</b> 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><b>Housing/Commercial/Light Industrial Density:</b></p> <p>o <b>Item 15:</b> 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

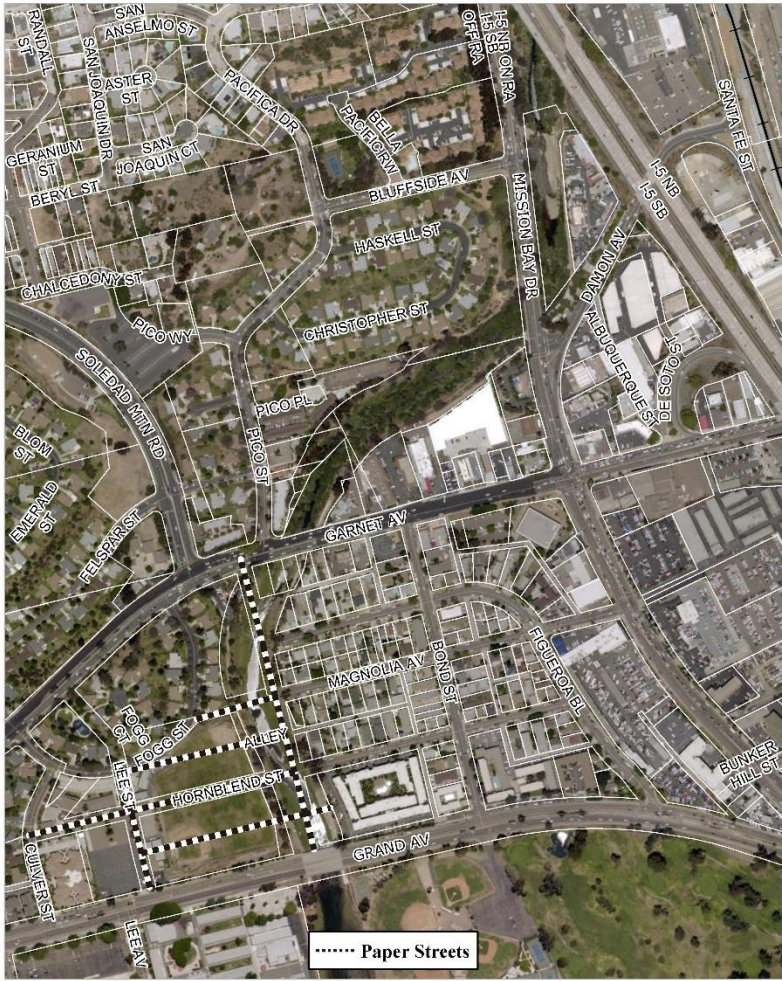
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AG-22 Please see Response AG-15.

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 # <sup>1</sup>	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

<sup>1</sup> 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 # <sup>1</sup>	Acres	Notes
4171801500 <sup>-**</sup>	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 <sup>+</sup> (On the SANDAG GIS Map this encompasses APN 7601038300) **	3.28	Owned by City of San Diego
7601038300 <sup>-**</sup>	.17	Owned by City of San Diego
4172421300 <sup>-**</sup>	1.27	Owned by City of San Diego
4172423100 <sup>-**</sup>	NaN	Owned by City of San Diego
4172423200 <sup>-**</sup>	NaN	Owned by City of San Diego
4172423300 <sup>-**</sup>	NaN	Owned by City of San Diego
4172423400 <sup>-**</sup>	NaN	Owned by City of San Diego
4172422400 <sup>-**</sup>	NaN	Owned by City of San Diego
4172421300 <sup>-**</sup>	NaN	Owned by City of San Diego
4172421900 <sup>+</sup>	NaN	Private Property extending into creek. Owned by Don F. Fells. Only dedicate portion in channel if possible.
4172422600 <sup>+</sup>	NaN	Owned by City of San Diego
4172422800 <sup>+</sup>	NaN	Owned by City of San Diego
4172423600 <sup>+</sup>	NaN	Owned by City of San Diego
4172423000 <sup>+</sup>	NaN	Owned by City of San Diego
4172912300 (Also listed as APN 41729122) <sup>+</sup>	NaN	Owned by City of San Diego
4172910300 <sup>+</sup>	NaN	Owned by City of San Diego
4192910200 <sup>+</sup>	NaN	Owned by City of San Diego
4172910100 <sup>+</sup>	NaN	Owned by City of San Diego
Pico Street Paper Street south of APN 4172910100 <sup>+</sup>	NaN	Owned by City of San Diego
4172820500 <sup>+</sup>	NaN	Owned by City of San Diego
4241020500 <sup>+</sup>	NaN	Owned by City of San Diego
4241123400 <sup>+</sup>	NaN	Owned by City of San Diego
4241112800 <sup>+</sup>	NaN	Owned by City of San Diego
4241020500 <sup>+</sup>	NaN	Owned by City of San Diego
Pico Street Paper Street East of APN 4241020500 and West of 4241123400 <sup>+</sup>		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)*

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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/PBPGecoDistrictDesignChecklist20161020.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)*

Page 8 of 9

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](http://www.saverosecreek.org)

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

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Addendum 3



### Existing Project Densities

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

### Density

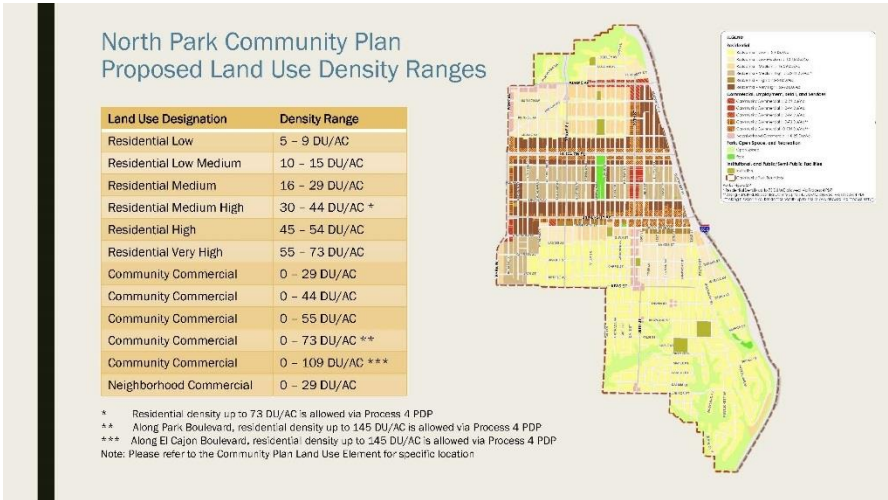
Residential density is dwelling units per acre. It is determined by dividing the number of dwelling units (DU's) by the total area of a project site in acres (AC):

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

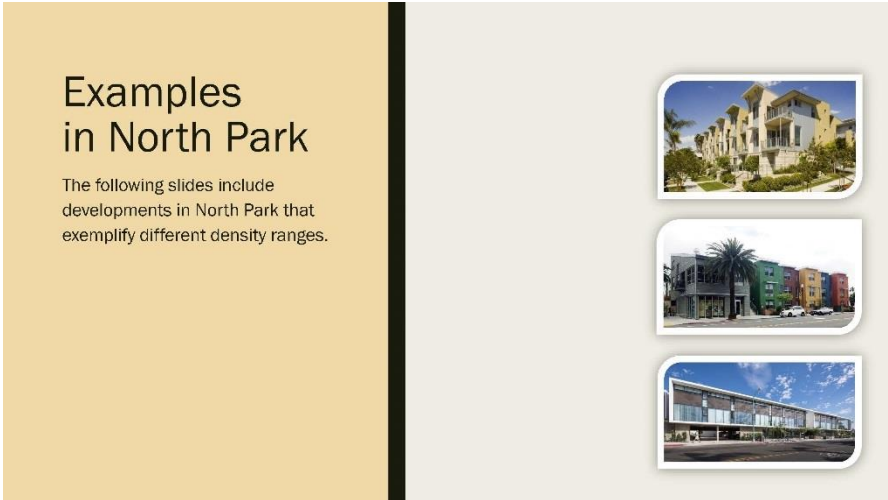
Building materials, Floor Area Ratio, and applicable building height, setbacks, design guidelines are other factors that will influence how a development project will look.

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Addendum 3 (cont.)



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## Addendum 3 (cont.)



33 DU/AC

**Hamilton Row**  
*Hamilton St. and Lincoln Ave.*

16 dwelling units  
0.48 acres  
3 stories

Photo courtesy of Allard Jansen Architects, Inc.



38 DU/AC

**Streetcar Rowhomes**  
*Adams Ave. and Idaho St.*

12 dwelling units  
0.32 acres  
2-3 stories

Photo courtesy of Vickie White

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## Addendum 3 (cont.)




Photo credit: © Matthew Segal

**39 DU/AC**

**The North Parker**  
30<sup>th</sup> 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**  
30<sup>th</sup> 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.






Photo courtesy of: Friends of San Diego Architecture

28 DU/AC

**Kensington Park Plaza**  
Adams Ave. & Marlborough Dr.

11 dwelling units  
0.40 acres  
2 stories

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## Addendum 3 (cont.)



Photo courtesy of: Coldwell Banker Residential Brokerage

47 DU/AC

**One Mission**  
845 Fort Stockton

65 dwelling units  
1.38 acres  
5 stories



Photo courtesy of: Mayfair Communities

49 DU/AC

**Wellington Square**  
4045 First Avenue

30 dwelling units  
0.61 acres  
4 stories

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## Addendum 3 (cont.)



Photo courtesy of M.W. Steele Group

49 DU/AC

**Cambridge Square**  
4<sup>th</sup> Ave. and Nutmeg St.

34 dwelling units  
0.69 acres  
4 stories




Photo courtesy of San Diego Architectural Foundation

55 DU/AC

**Centre Street Lofts**  
Centre St. between  
University and Robertson

55 dwelling units  
0.40 acres  
3 stories

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## Addendum 3 (cont.)



*Photo courtesy of: Bridge Housing*

58 DU/AC

**Paseo at COMM 22**  
2325 Commercial Street

272 dwelling units  
4.65 acres  
4 stories



*Photo courtesy of: Merrill Gardens at Bankers Hill*

60 DU/AC

**Merrill Gardens**  
2<sup>nd</sup> Ave. and Maple St.

84 dwelling units  
1.38 acres  
5 stories

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## Addendum 3 (cont.)



Photo courtesy of: League of California Cities

60 DU/AC

**Metro Villas**

*39<sup>th</sup> St. and University Ave.*

120 dwelling units  
2 acres  
4 stories



Photo courtesy of: Atlas on 5th

90 DU/AC

**Atlas on 5<sup>th</sup>**

*5<sup>th</sup> Ave. and Pennsylvania Ave.*

140 dwelling units  
1.55 acres  
5-6 stories

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## Addendum 3 (cont.)



Photo courtesy of: Doma Condos

91 DU/AC

**Doma**

*Kettner Blvd. & Date St.*

124 dwelling units  
1.35 acres  
9 stories



Photo courtesy of: Kensington Commons

99 DU/AC


**Kensington Commons**

*Adams Ave. & Marlborough Dr.*

34 dwelling units  
0.344 acres  
3 stories

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## Addendum 3 (cont.)



109 DU/AC

5th and Laurel St.


150 dwelling units  
1.38 acres  
4-5 stories

Google Street View

### 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.)



*Photo courtesy of: Loopnet*

152 DU/AC

**Broadstone**

*Kettner Blvd. and Fir St.*

199 dwelling units  
1.31 acres  
6-7 stories



*Photo courtesy of: Market Street Village Apartments*

166 DU/AC

**Market Street Village**

*Market St and 14<sup>th</sup> Ave.*

229 dwelling units  
1.38 acres  
5 stories

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Addendum 3 (cont.)



Photo courtesy of Greater Realty

200 DU/AC

**Aloft on Cortez Hill**  
*Date St. and 9<sup>th</sup> Ave.*

168 dwelling units  
0.84 acres  
5 stories

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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,  
  
Henish Pulickal,  
Chairperson, Pacific Beach Planning Group

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## COMMENTS

## RESPONSES

TO: [PlanningCEQA@sandiego.gov](mailto: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@icontactweb.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 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>	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.
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>	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.
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>	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.
AH-14	<p>Please allow for the taking of property or easements required to achieve plan goals for pedestrian safety, reduced pollution etc.</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.
AH-15	<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>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 this 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.



## COMMENTS

## RESPONSES

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 E-1 (cont) Executive Summary states: Roadway Section Three consecutive segments of Garnet Avenue from Mission Bay Drive to Morena Boulevard SB Ramps ....Cumulatively significant and unavoidable<sup>1</sup> 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><b>ES.6.2 Medium Density Alternative</b> 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 ESL 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<sup>SEP</sup>

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	<p>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]</p> <p>++ 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?</p>	<p>AH-36 Upon completion of the BASASP, all identified improvements will be added to the Transportation Needs List to compete for funding.</p>
AH-37	<p>29. Re Figure 5.15-13 and related policies and specifically the crosswalk placements and bike route</p> <p>++ 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]</p>	<p>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.</p>
AH-38	<p>[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]</p>	<p>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.</p>
AH-39	<p>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,</p>	<p>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.</p> <p>The Commercial and Industrial zones allow for parking facilities as a primary use.</p>



## COMMENTS

## RESPONSES

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 O<sub>3</sub>. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O<sub>3</sub> 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

BALBOA AVENUE STATION AREA SPECIFIC PLAN PEIR 5.2-8 APRIL 2018 *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]

### 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 the 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-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-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?

AH-57 Housing and population estimates are included in Tables 5.12-1 through 5.12-4 in Section 5.12, *Population and Housing*, 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 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-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."

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.

AH-61 Please see Response AG-7.

## 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  <b>5.2.4.3 Mitigation Framework</b>  Mitigation for inconsistencies with the RAQS would be as follows:  <b>AQ-1</b> 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.) 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.  
 ++ 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?

AH-67 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?

AH-68 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?

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, *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).

AH-68 Please see Response AE-34 with regard to emergency services and response times.

## 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][L][SEP][SEP]

AH-70

57. "Minimize building setbacks, bringing buildings close to sidewalks; locate parking to the rear of lots, off of the alleys." [L][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][L][SEP][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 Aero 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](mailto:contactecsd@gmail.com) \* [www.sandiegoeco.org](http://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

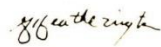
The Environmental Center also has concerns with the proposed plan in regards to air pollution, traffic conditions, and pedestrian accessibility to this station and Mission Bay. The pollution and traffic congestion will rise in relation to a population increase. The intersection of Mission Bay Drive and 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

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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@iccontactweb.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@iccontactweb.com](mailto:Carolyn@iccontactweb.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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San Diego CA 92112-1390  
conservation@cnpsd.org | www.cnpsd.org

June 11, 2018

Rebecca Malone  
Environmental Planner  
City of San Diego Planning Department  
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@cnpsd.org](mailto:conservation@cnpsd.org) and [franklandis03@yahoo.com](mailto: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.




**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 Acro 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*

AM-3  
(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

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 4 of 16*

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 <a href="https://www.cal-ipc.org/plants/inventory/">https://www.cal-ipc.org/plants/inventory/</a> )

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

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 5 of 16*

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.

## COMMENTS

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 6 of 16*

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-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).

## COMMENTS

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 7 of 16*

AM-12  
(cont.)

AM-13

AM-14

AM-15

AM-16

AM-17

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

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 8 of 16*

AM-18

AM-19

AM-20

AM-21

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

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 9 of 16*

AM-22  
(cont.)

AM-23

AM-24

AM-25

AM-26

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

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 11 of 16*

AM-30  
(cont.)

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 <a href="https://www.arb.ca.gov/ch/handbook.pdf">https://www.arb.ca.gov/ch/handbook.pdf</a>), 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 <b>residential communities</b> (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

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

## RESPONSES

*Friends of Rose Creek CEQA Comments PROJECT No.: 586601 / SCH No. 2017071007, Page 12 of 16*

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 <a href="http://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf?la=en">http://www.baaqmd.gov/~media/files/planning-and-research/planning-healthy-places/php_may20_2016-pdf.pdf?la=en</a>, 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"><li>• Plan sensitive land uses as far from local sources of air pollution such as freeways as is feasible.</li><li>• Consider incorporating solid barriers into site design, similar to a sound wall, between buildings and sources of air pollution (for example, a freeway).</li><li>• 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.</li><li>• 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.</li></ul> <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  
(cont.)

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## COMMENTS

## RESPONSES

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(cont.)

AM-32

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 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

## RESPONSES

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

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(cont.)

AM-33

AM-34

AM-35

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

## RESPONSES

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

AM-36  
(cont.)

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 <a href="https://www.tenthacrefarm.com/2015/03/10-reasons-to-plant-a-hedgerow/">https://www.tenthacrefarm.com/2015/03/10-reasons-to-plant-a-hedgerow/</a>.</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	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.
38.	Transportation Analysis	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?

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.

## COMMENTS

## RESPONSES

*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  
Executive Director  
Friends of Rose Canyon



Pamela Heatherington  
Founding Board Member  
Environmental Center of San Diego

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## COMMENTS

## RESPONSES

Karin Zirk  
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June 12, 2018

*Submitted via email to PlanningCEQA@sandiego.gov*

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9485 Aero Drive, MS 413  
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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

AN-3 (cont.)		<b>Comment Number</b>	<b>Comment</b>
AN-4			of land between the Public Storage Facility and the Mossy Toyota for the community's preferred active transportation access point to the trolley station.
AN-5		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.
AN-6		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?
AN-7		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.
AN-8		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.)

AN-9

AN-10

AN-11

AN-12

AN-13

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 1, 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"> <li>• Create walkable neighborhoods.</li> <li>• Foster distinctive, attractive communities with a strong sense of place.</li> <li>• Preserve open space, natural beauty, and critical environmental areas.</li> </ul>
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 ( <a href="http://www.sandiegouniontribune.com/news/data-watch/sdut-san-diego-food-deserts-2016may15-htmlstory.html">http://www.sandiegouniontribune.com/news/data-watch/sdut-san-diego-food-deserts-2016may15-htmlstory.html</a> ) 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 <a href="https://www.arb.ca.gov/ch/handbook.pdf">https://www.arb.ca.gov/ch/handbook.pdf</a> ). 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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Comment Number	Comment
	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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9485 Aero Drive, MS 413  
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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  
(cont.)

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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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.<sup>1</sup> 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

<sup>1</sup> As of June 11<sup>th</sup>, 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 26<sup>th</sup>, 2018, and nowhere indicated the comment period ending as of June 12<sup>th</sup> 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  
(cont.)

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  
(cont.)

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.<sup>2</sup> 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.

<sup>2</sup> 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.”

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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 BAS/ASP 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 BAS/ASP 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 Claremont.

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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.<sup>3</sup> 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.<sup>4</sup>

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

<sup>3</sup> 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](http://www.lung.org/local-content/california/documents/state-of-the-air/2018/sota-2018_ca_san-diego-fact.pdf).

<sup>4</sup> 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](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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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 Claremont 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 1990 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 a 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.

[\[PDF\] 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)


[\[PDF\] 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

## RESPONSES

 [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](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) (<mailto:mprinz@sandiego.gov>)

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Community Planning

- [Community Planning Home \(/planning/community\)](#)
- [Community Plan Updates \(/planning/community/cpu\)](#)
- ▼ [Community Planners Committee \(/planning/community/cpc\)](#)
  - [Agendas \(/planning/community/cpc/agendas\)](#)
  - [Appointments and Committees \(/planning/community/cpc/appts\)](#)
  - [Meeting Minutes \(/planning/community/cpc/minutes\)](#)
  - [Other Resources \(/planning/community/cpc/resources\)](#)
- ▼ [Community Planning Groups \(/planning/community/cpg\)](#)
  - [Community Bylaws \(/planning/community/cpg/bylaws\)](#)
  - [Frequently Asked Questions \(/planning/community/cpg/faq\)](#)
  - [Meeting Agendas \(/planning/community/cpg/agendas\)](#)
- ▼ [Community Planning Workshops and Resources \(/planning/community/resources\)](#)
  - [Community Media Resources \(/planning/community/resources/media\)](#)
  - [Public Involvement Resources \(/planning/community/resources/public\)](#)
- [Community Plans \(/planning/community/plans\)](#)
- [Community Profiles \(/planning/community/profiles\)](#)
- [Overview & Background \(/planning/community/overview\)](#)

**Planning Department**  
9485 Aero Dr., M.S. 413  
San Diego, CA 92123  
Phone: 619-235-5200  
Email: [planning@sandiego.gov](mailto: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) (<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

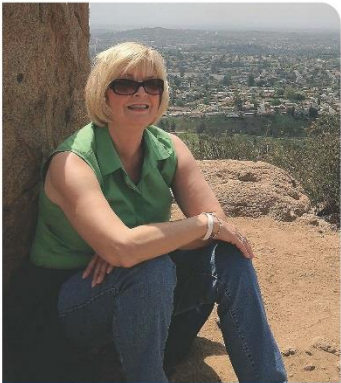
Rank Among U.S. Cities for Unhealthy Air		
Metro Area	Ozone Rank	Particle Rank
El Centro	15	9
San Diego	6	—

Regional Grades and Unhealthy Air Days				
County	Ozone Days <sup>†</sup>	Ozone Grade	Particle Days <sup>†</sup>	Particle Grade
Imperial	17.2	F	11.2	F
San Diego	36.8	F	1.5	C

<sup>†</sup> 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

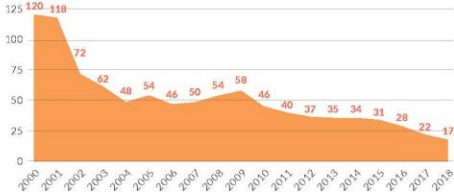
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Who is at Risk in San Diego/Imperial County?

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

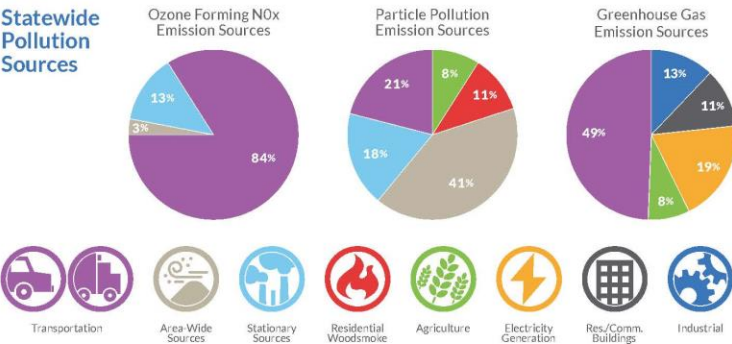
El Centro Unhealthy Ozone Days  
STATE OF THE AIR 2000 - 2018



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 10<sup>th</sup>, 2018

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

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 3<sup>rd</sup> 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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[www.sustainabilitymatters.us](http://www.sustainabilitymatters.us)

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AP-1  
(cont.)



My questions to the BATSP PEIR draft response:

AP-2

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?

AP-3

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?

AP-4

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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www.sustainabilitymatters.us

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.)

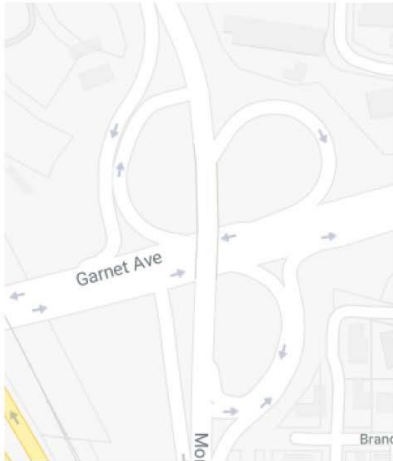
AQ-1 The BASASP identifies multi-modal improvements to enhance access from Clairemont Mesa and Pacific Beach to the Balboa Avenue Trolley Station. Section 3.2 of the BASASP identifies pedestrian improvements, which include non-contiguous sidewalks and shared-use paths along Garnet Avenue and Mission 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 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](mailto: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

1

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. [nicole23ob@gmail.com](mailto:nicole23ob@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@saniego.gov](mailto:PlanningCEQA@saniego.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 PB EcoDistrict 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.

## COMMENTS

## RESPONSES

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.

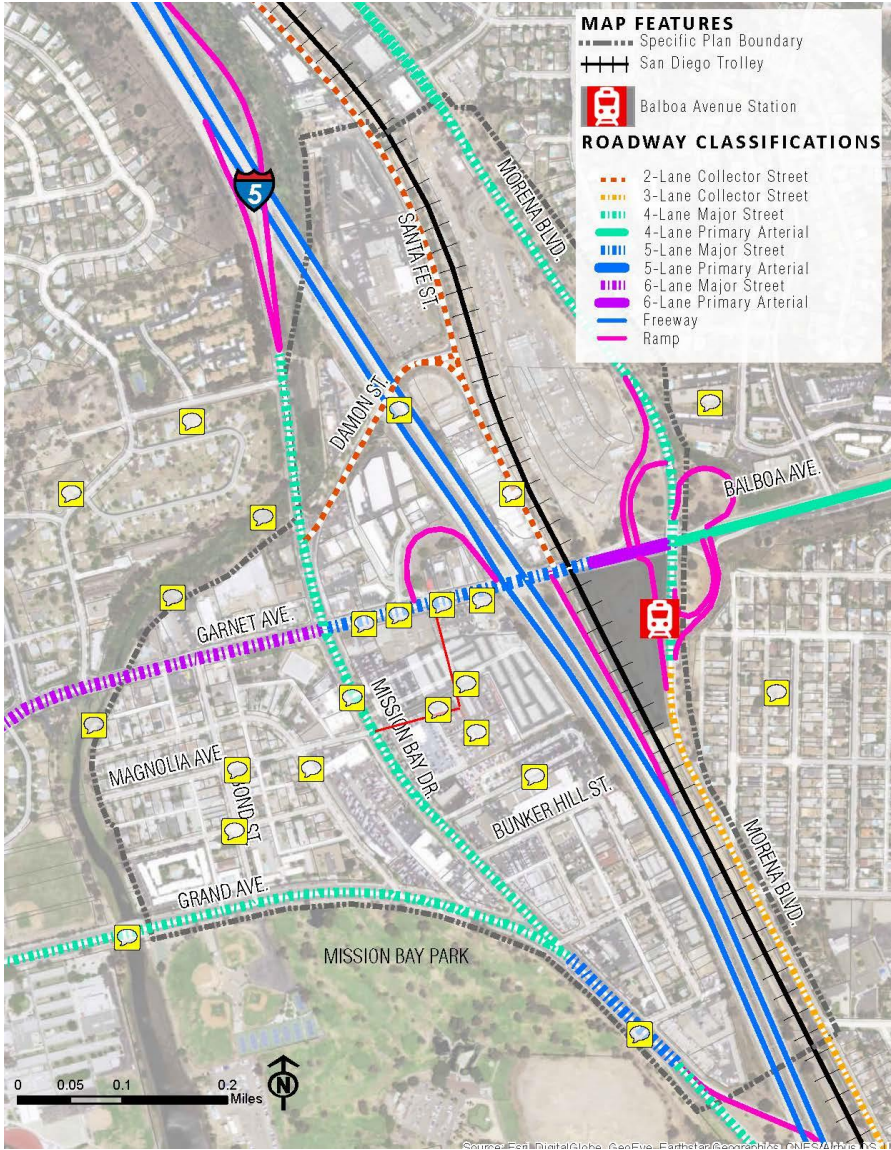
Thanks you for your consideration



Kristen Victor, Board Member and Past President  
Beautiful PB,  
A 501(c)(3) Non-Profit Corporation

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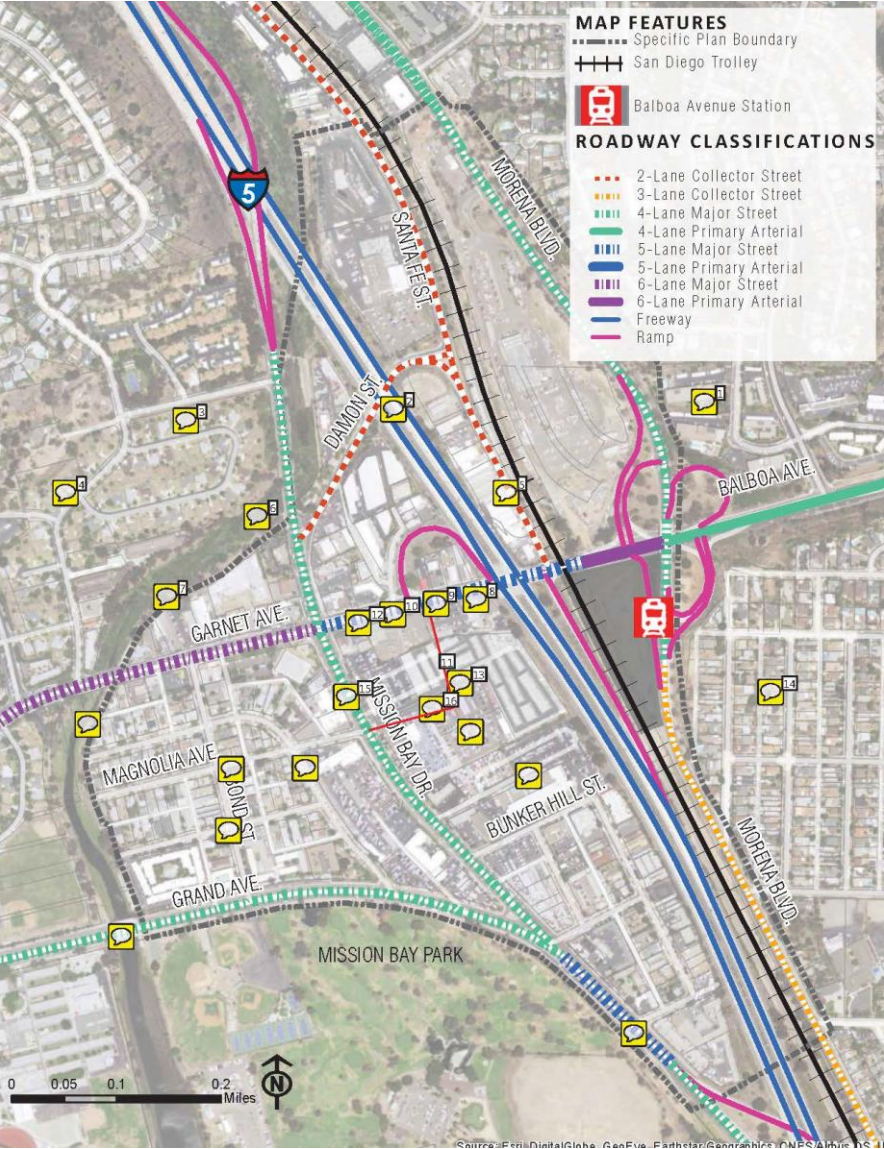
Addendum 1



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Addendum 2



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## Addendum 2

## Summary of Comments on Connect PB Comments.pdf

Page: 1

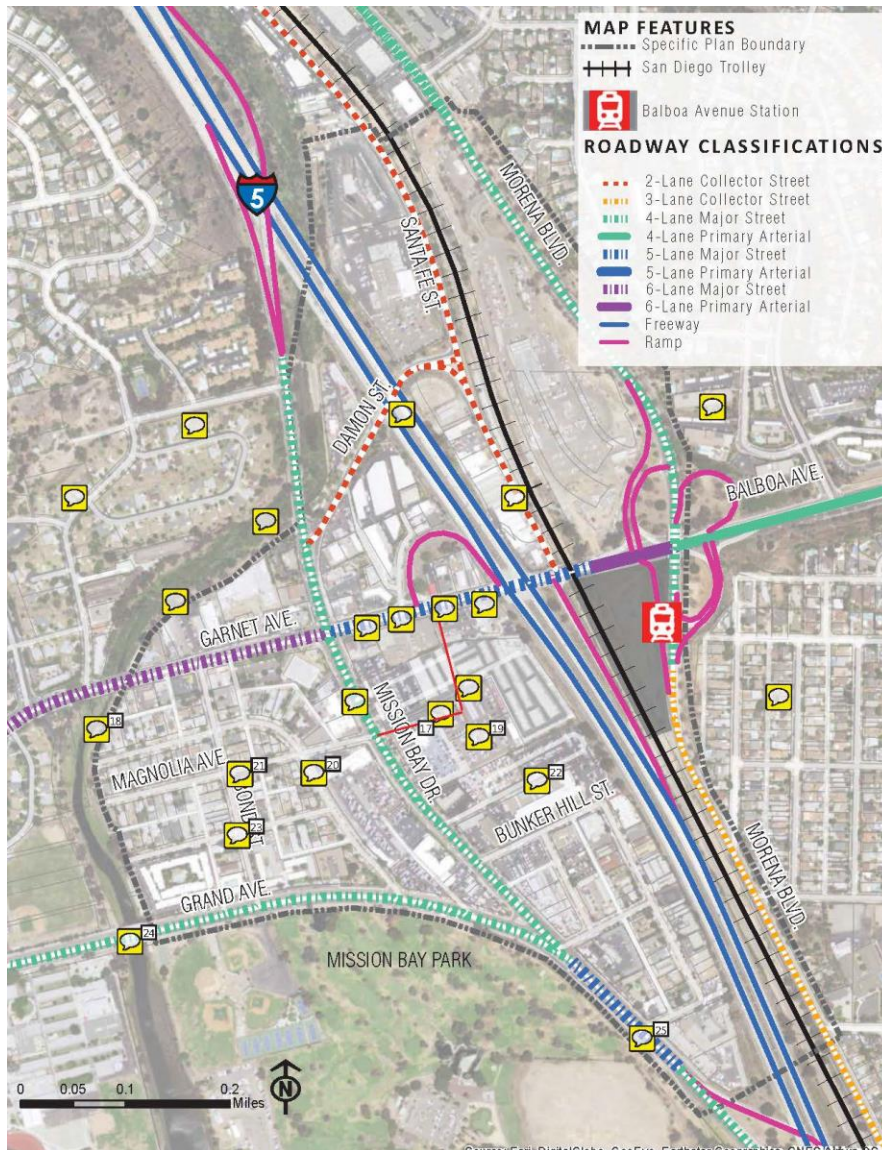
Number: 1	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:41:20 AM
Maintain and enhance multifamily zoning.			
Number: 2	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:45:24 AM
Pedestrian Crossing			
Number: 3	Author: 30054	Subject: Sticky Note	Date: 6/12/2018 6:50:25 AM
General housing comments:			
*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, Skyfari			
*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 7:00:27 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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## COMMENTS

## RESPONSES

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>	AT-2 The BASASP contains specific policies to provide a diversity of housing types and affordable housing.
AT-2	<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>	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.
AT-3	<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>	AT-4 This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.
AT-4	<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>	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.
AT-5	<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>	AT-6 This comment does not raise any environmental issues with respect to the adequacy of the Draft PEIR. No further response is required.
AT-6	<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>	

## 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.

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-8

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,

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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.