

Mission Valley Community Plan Update

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH# 2017071066 | MAY 31, 2019



**Mission Valley Community Plan Update
Final Program Environmental Impact Report
San Diego, California**

May 31, 2019

SCH# 2017071066

Prepared for:

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

Prepared by:

The Bodhi Group
Chen Ryan Associates
Dyett & Bhatia Urban and Regional Planners
Heritage Architecture and Planning
Proteus Consulting
RECON Environmental
Rick Engineering
Tierra Environmental

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 518009
SCH No. 2017071066

SUBJECT: MISSION VALLEY COMMUNITY PLAN UPDATE

Applicant: City of San Diego Planning Department

FINAL DOCUMENT – May 31, 2019:

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

PROJECT DESCRIPTION:

The project analyzed in this Final PEIR is the Mission Valley Community Plan Update (proposed CPU), which is an update to the Community Plan that guides development of the entire Mission Valley community. The proposed CPU is a policy document which describes the community's vision and identifies strategies for enhancing community character and managing change. It includes goals, policies and implementing actions to guide local decision-making and public investments for the CPU area in the future.

Development in Mission Valley will be guided and regulated through the proposed CPU, the City of San Diego Municipal Code (SDMC), the General Plan, and applicable Specific Plans. Specific development standards for development within the San Diego River Park and Hillside Review areas in the CPU area are also proposed to be codified in Chapter 13, Article 2, Division 14 of the SDMC as a Community Plan Implementation Overlay Zone (CPIOZ) as part of the proposed CPU. These standards currently exist as Chapter 15 Article 14 of the SDMC, Mission Valley Planned District, and would become CPIOZ standards upon adoption of the proposed CPU.

PROJECT LOCATION:

The Community Planning Area is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and I-5 on the west, encompassing an area of approximately five square miles. Mission Valley is bordered by several other community planning areas: Old Town San Diego, Uptown, Greater North Park, Normal Heights, Kensington-Talmadge, and College Area to the south, Navajo to the east, Tierrasanta, Kearny Mesa, Serra Mesa, and Linda Vista to the north, and Mission Bay Park to the west.

The Mission Valley Community Plan can be found on the Planning Department's website at:

<https://www.sandiego.gov/planning/community/cpu/missionvalley>

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Air Quality (Conflict with Air Quality Plan, Air Quality Standards); Historical, Cultural, and Tribal Cultural Resources; Hydrology and Water Quality (Flooding and Drainage Patterns); Noise (Ambient Noise, Land Use Compatibility, Temporary Construction Noise); Public Services and Facilities (Police Protection, Parks and Recreation, Fire/Life Safety Protection, Libraries, Schools); Public Utilities and Infrastructure (Utilities); and Transportation (Traffic Circulation)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

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

RESULTS OF PUBLIC REVIEW:

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



Alyssa Muto, Deputy Director
Planning Department

February 6, 2019
Date of Draft Report

May 31, 2019
Date of Final Report

Analyst: Rebecca Malone, AICP, Planning Department

PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL GOVERNMENT

U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. Army Corps of Engineers (26)

STATE OF CALIFORNIA

Caltrans District 11 (31)
Department of Fish and Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
Housing and Community Development Department (38)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A & 51B)
Native American Heritage Commission (56)
California Public Utilities Commission

COUNTY OF SAN DIEGO

Air Pollution Control District (65)
Planning and Development Services (68)
County Water Authority (73)
Department of Environmental Health (76)

CITY OF SAN DIEGO

Office of the Mayor (91)
Council President Gomez, District 9
Council President Pro Tem Bry, District 1
Councilmember Campbell, District 2
Councilmember Ward, District 3
Councilmember Montgomery, District 4
Councilmember Kersey, District 5
Councilmember Cate, District 6
Councilmember Sherman, District 7
Councilmember Moreno, District 8

Office of the City Attorney

Shannon Thomas, Deputy City Attorney

Planning Department

Mike Hansen, Director
Tom Tomlinson, Assistant Director

Planning Department, cont.

Alyssa Muto, Deputy Director
Laura Black, Deputy Director

Brian Schoenfisch, Program Manager
Nancy Graham, Development Project Manager III
Rebecca Malone, Senior Planner
Melissa Garcia, Senior Planner
Leslie Stahl, Senior Planner
Elena Pascual, Assistant Planner
Jordan Moore, Assistant Planner
Samir Hajjiri, Senior Traffic Engineer
Maureen Gardiner, Associate Traffic Engineer
Emanuel Alforja, Assistant Traffic Engineer
Myra Herrmann, Senior Planner
Susan Morrison, Associate Planner
Scott Sandel, Park Designer – Park Planning
Kelley Stanco, Senior Planner – Historic Resources
Oscar Galvez III, Senior Planner

Development Services Department

Gary Geiler, Deputy Director
PJ FitzGerald, Assistant Deputy Director
Peter Kann, Development Project Manager I
James Quinn, Senior Engineer Geologist
Jay Purdy, Assistant Engineer – Civil
Bill Prinz, Program Manager

Environmental Services Department

Lisa Wood, Senior Planner

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal

Police Department

Tristan Schmottlach, Sergeant

Public Utilities Department

George Adrian, Program Manager
Shelby Gilmartin, Assistant Engineer – Civil

Transportation & Storm Water Department

Mark Stephens, Associate Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

Libraries

Central Library, Government Documents (81 & 81A)
Mission Valley Branch Library (81R)

City Advisory Boards or Committees

Historical Resources Board (87)
Park and Recreation Board (89)
Wetlands Advisory Board (91A)

Other City Governments

San Diego Association of Governments (108)
Metropolitan Transit System (112/115)
San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (132)

Community Planning Groups or Committees

College Area Community Planning Board (456)
North Park Planning Committee (363)
Kearny Mesa Community Planning Group (265)
Kensington-Talmadge Planning Committee (290)
Linda Vista Planning Group (267)
Mission Valley Planning Group (331)
Navajo Community Planners (336)
Normal Heights Community Planning Committee (291)
Old Town Community Planning Committee (368)
Serra Mesa Planning Group (263A)
Tierrasanta Community Council (464)
Uptown Planners (498)

Other Agencies, Organizations and Individuals

The San Diego River Park Foundation (163)
San Diego River Coalition (164)
Sierra Club San Diego Chapter (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Jim Peugh (167A)
San Diego River Conservancy (168)
Environmental Health Coalition (169)
California Native Plant Society (170)
Citizens Coordinate for Century 3 (179)
Endangered Habitats League (182 & 182A)
League of Women Voters (192)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Clint Linton (215B)
Frank Brown - Inter-Tribal Cultural Resource Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society Inc. (218)
Native American Heritage Commission (222)
Kuumeyaay Cultural Heritage Preservation (223)
Kuumeyaay Cultural Repatriation Committee (225)

Other Agencies, Organizations and Individuals, cont.

Native American Distribution

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

Campo Band of Mission Indians (225B)

Ewiiapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)

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

Mesa Grande Band of Mission Indians (225J)

San Pasqual Band of Mission Indians (225K)

Ipai Nation of Santa Ysabel (225L)

La Jolla Band of Mission Indians (225M)

Pala Band of Mission Indians (225N)

Pauma Band of Mission Indians (225O)

Pechanga Band of Mission Indians (225P)

Rincon Band of Luiseno Indians (225Q)

San Luis Rey Band of Luiseno Indians (225R)

Los Coyotes Band of Mission Indians (225S)

Friars Village HOA (270)

Friends of the Mission Valley Preserve (330B)

Denise Davidson

Yolanda France

Alan Grant

Myra Lousteau

Wayne Williams

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I Introduction

This Final Program Environmental Impact Report (PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code [PRC] Section 21000 et seq.) and CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). Together with the circulated Draft PEIR (State Clearinghouse No. 2017071066), published February 6, 2019, this document constitutes the Final PEIR for the proposed Mission Valley Community Plan Update (CPU), referred to as the “proposed CPU.” This Final PEIR contains responses to comments received on the Draft PEIR during the public review period, which began February 6, 2019, and closed March 23, 2019, as well as revisions to the Draft PEIR. The primary purpose of the Final PEIR is to revise and refine the environmental analysis in the Draft PEIR in response to comments received during the public review period.

This document represents the independent judgment of the Lead Agency. The City of San Diego is the Lead Agency responsible for ensuring that the proposed CPU complies with CEQA. “Lead Agency” is defined by Section 21067 of CEQA as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”

I.1 CEQA Requirements

CERTIFICATION OF THE FINAL PEIR

Before the City may approve the various discretionary actions needed to implement the proposed CPU, it must independently review and consider the information contained in the Final PEIR, certifying that the Final PEIR adequately discloses the environmental effects of the proposed CPU, that the Final PEIR has been completed in conformance with CEQA, and that the decision-making body of the Lead Agency independently reviewed and considered the information contained in the Final PEIR. Certification of the Final PEIR would indicate the City’s determination that the Final PEIR adequately evaluates the environmental impacts that could be associated with the proposed CPU.

For impacts identified in the PEIR that cannot be reduced to a level that is less than significant, the City must make findings and prepare a Statement of Overriding Considerations for approval of the proposed CPU if specific social, economic, or other factors justify the proposed CPU’s unavoidable adverse environmental effects. If the City decides to approve the proposed CPU for which the Final PEIR has been prepared, it will issue a Notice of Determination.

The City of San Diego has prepared this document pursuant to CEQA Guidelines Section 15132, which specifies that the Final PEIR shall consist of:

- The Draft PEIR or a revision of the Draft;
- A list of persons, organizations, and public agencies commenting on the Draft PEIR;
- Comments and recommendations received on the Draft PEIR;
- The response of the Lead Agency to significant environmental points raised in the review process; and
- Any other information added by the Lead Agency.

This Final PEIR incorporates comments from public agencies and the general public. It also contains the Lead Agency's responses to those comments. Copies of the Final PEIR have been provided to agencies and other parties that commented on the Draft PEIR or have requested the Final PEIR. The Final PEIR can also be accessed through the City of San Diego website.

NEW INFORMATION IN THE FINAL PEIR

If *significant new information* is added to an EIR after notice of public review has been given, but before final certification of the EIR, the Lead Agency must issue a new notice and recirculate the EIR for further comments and consultation. Significant new information is that which discloses that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Corrections or clarifications to the Draft PEIR identified in this document do not constitute *significant new information* pursuant to Section 15088.5 of the CEQA Guidelines; this new information merely clarifies and makes insignificant changes to an adequate PEIR. Information presented in the Draft PEIR and this document support this determination.

COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review and comment of Draft PEIRs should be "on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would

provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.”

CEQA Guidelines Section 15204(c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final PEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft PEIRs.

1.2 Format of the Final PEIR

This document is organized as follows:

- **Chapter 1: Introduction.** This chapter describes CEQA requirements and content of this Final PEIR.
- **Chapter 2: Response to Comments.** This chapter provides a list of agencies and interested persons commenting on the Draft PEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter (A1-A5, B1-B9, C1-C10). Individual comments have been lettered within each comment letter and is followed by responses with references to the corresponding comment number.
- **Chapter 3. Revisions to the Draft PEIR.** This chapter contains the revised version of the Draft PEIR text and figures per the comments received by agencies and interested persons as described in Chapter 2, and/or errors and omissions discovered subsequent to release of the Draft PEIR for public review. The revised Draft PEIR is provided in ~~strikeout~~underline.

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2 Response to Comments

Section 15088 of the CEQA Guidelines requires the Lead Agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft PEIR and prepare written responses. This chapter provides all written responses received on the Draft PEIR and the City of San Diego’s responses to each comment.

2.1 Comments Received

A total of 23 comments were received during the 45-day comment period. This chapter also includes a letter from the State Clearinghouse acknowledging the City’s compliance with State Clearinghouse review requirements pursuant to CEQA and stating which comments were submitted by State agencies. Comments received are listed in Table 2-1.

Comment letters and specific comments are given letters and numbers for reference purposes (e.g. “Letter A1”). Specific comments within each letter are identified by a designator in the page margin that reflects the sequence of the specific comment within the correspondence (e.g. “A1-1” for the first comment in Letter A1). Comments are organized by public agency (Section A), organizations (Section B), and individuals (Section C).

Table 2-1: Comments Received on the Draft PEIR

Letter Number	Commenter	Agency/Organization	Date of Comment	Page Number
<i>Section A: Agencies (Federal, State, Regional, Local)</i>				
A1	Scott Morgan, Director	State Clearinghouse	March 29, 2019	FEIR-7
A2	Melina Pereira, Acting Branch Chief	California Department of Transportation (Caltrans) District 11	March 22, 2019	FEIR-8
A3	Seth Litchney, Senior Regional Planner	San Diego Association of Governments (SANDAG)	March 22, 2019	FEIR-11
A4	Laura V. Shinn, Director, Planning, Planning Design and Construction	San Diego State University (SDSU)	March 22, 2019	FEIR-14
A5	David Zoutendyk for Karen A. Goebel, Assistant Field Supervisor and Gail K. Stevens, Environmental Program Manager	United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW)	March 28, 2019	FEIR-20
<i>Section B: Organizations</i>				
B1	Penny M. Dealy, President	Dealy Development	February 15, 2019	FEIR-24
B2	Peterson & Price, APC	Jacobs Vernon Project, LLC	March 23, 2019	FEIR-27

B3	Felicity Senoski, Chair	Linda Vista Planning Group (LVPG) Riverwalk Ad Hoc Subcommittee	March 22, 2019	FEIR-30
B4	Jonathan Frankel, Chair	Mission Valley Community Planning Group	March 22, 2019	FEIR-37
B5	Rene A. Vidales, Chair	North Park Planning Committee	March 9, 2019	FEIR-46
B6	James A. Peugh, Conservation Chair	San Diego Audubon Society	March 23, 2019	FEIR-48
B7	Bruce Coons, Executive Director	Save Our Heritage Organization (SOHO)	March 20, 2019	FEIR-51
B8	Jennifer K. Roy of Latham & Watkins LLP	Westfield, LLC	March 23, 2019	FEIR-52
B9	John LaRaia, Vice President	H.G. Fenton Company	March 22, 2019	FEIR-67
<i>Section C: Individuals</i>				
C1	Cherie Ross	N/A	February 19, 2019	FEIR-71
C2	Christine August	N/A	March 17, 2019	FEIR-72
C3	Dennis McGibben	N/A	March 23, 2019	FEIR-75
C4	Eric Albert	N/A	March 22, 2019	FEIR-76
C5	Felicity Senoski	N/A	March 23, 2019	FEIR-79
C6	Jim and Martha Grant	N/A	March 23, 2019	FEIR-80
C7	June and William Krantz	N/A	March 22, 2019	FEIR-81
C8	Marilyn Lewis and Irving Tannenhau	N/A	March 16, 2019	FEIR-82
C9	Mary Shepperd	N/A	March 23, 2019	FEIR-85
C10	Richard Manley	N/A	March 23, 2019	FEIR-87



Govin Newsom
Governor

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



Kate Gordon
Director

Comment Letter A1

March 29, 2019

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

Subject: Mission Valley Community Plan Update Program EIR
SCH#: 2017071066

Dear Rebecca Malone:

The comment (s) on your EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on 3/22/2019. **Please check the CEQA database for these comments:** <https://ceqanet.opr.ca.gov/2017071066/2> because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2017071066) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

A1-1

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6075
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

Comment Letter A2

March 22, 2019

11-SD-VAR
(5, 163, 805, 15, 8)
Mission Valley Community Plan Update PEIR
DEIR SCH 2017071066

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

Dear Ms. Malone:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Mission Valley Community Plan Update (MVCPU) Program Environmental Impact Report. The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability.

A2-1

The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use and infrastructure plans and projects through the lenses of our mission, vision, and goals as guided by the State's planning priorities of prioritizing infill, conservation, and efficient development. Caltrans seeks to reduce vehicle trips and new vehicle miles traveled associated with development and recommends appropriate measures to avoid, minimize, or mitigate transportation impacts through smart mobility community design and innovative multimodal demand reduction strategies.

Caltrans would like to submit the following comments:

Transportation Systems and Demand Management and Operations

A2-2

Caltrans encourages the City to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. As such, we encourage the City to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. The Department also seeks to reduce serious injuries and fatalities, as well as provide equitable mobility options for those who are economically, socially, or physically disadvantaged.

Caltrans supports improved multimodal transportation accommodation through the provision of Park and Ride lots adjacent to transit facilities or near HOV entrances, improved bicycle and pedestrian access and safety improvements (Complete Streets), adaptive signal control systems to optimize traffic flow, signal priority for transit vehicles, the ability to integrate future technologies, or other enhancements that promote a complete and integrated transportation system. Early coordination with Caltrans in locations that may affect both Caltrans and the City of San Diego is encouraged.

A2-3

Figure 4.13-3: Existing and Planned Bicycle Network shows planned Class I, Class II, and Class IV bicycle facilities that will cross through Caltrans right-of-way. The City should plan to coordinate early in the project development process with Caltrans District 11 Planning to navigate the Caltrans encroachment permit process for the bicycle network projects. Furthermore, the following Caltrans documents should be utilized to design the bicycle facilities through Caltrans right-of-way.

- Caltrans Design Information Bulletin (DIB) 89-01 Class IV Bikeway Guidance: <http://www.dot.ca.gov/design/stp/dib/dib89-01.pdf>
- Caltrans Highway Design Manual (HDM): <http://www.dot.ca.gov/design/manuals/hdm.html>
- California Manual on Uniform Traffic Control Devices (CA MUTCD): <http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev3.html>

Energy Management

Emissions from on-road vehicles are the largest contributor to GHG in the San Diego region. The most desirable method of lowering the GHG emissions from vehicles is mode shifts to transit, bicycling, and walking. However, these mode shifts may not be practical for all residents of San Diego.

Although gasoline-powered vehicles are still the most common type of vehicles in the San Diego region, a shift toward electrification benefits communities by reducing local pollution from vehicle tailpipes, reduces noise pollution, and helps local governments meet goals to combat climate change.

Caltrans recommends that the City of San Diego encourage the development of public electric vehicle charging infrastructure in the Mission Valley Community Plan. Local governments can play a key role in helping share information about electric vehicle charging and assisting employers, retail outlets, and entertainment venues in areas where gaps exist in the charging infrastructure. By encouraging the adoption of electric vehicles through the installation of public charging equipment, the Mission Valley Community is an even more attractive place for ZEV drivers to live, shop, work, and do business.

Transportation Impact Fees

Caltrans generally agrees with the MVCPU proposed highway intersection impact areas and proposes additional study be done to determine scope of needed mitigation improvements and to determine fair share impact fees.

Interstate 8:

- @ Morena Boulevard - Bike and pedestrian facilities improvement.
- @ Hotel Circle/Street "J"/Fashion Valley Road –Interchange reconfiguration.
- @ Mission Center Road –Interchange reconfiguration.
- @ Qualcomm Way/Texas Street –Interchange reconfiguration.

State Route 163:

- @ Friars Road – "Phase 2" construct a new collector ramp from southbound SR-163 to westbound I-8 and a new flyover entrance ramp from Ulric Street to southbound SR-163. "Phase 3" construct two southbound SR-163 auxiliary lanes from Genesee Avenue to Friars Road. Construct a northbound SR-163 auxiliary lane.

A2-4

A2-5

A2-6

Interstate 805:

@ Phyllis Place – Road and ramp widening, signal modifications, and restriping.

Interstate 15:

@ Friars Road – Bridge widening and ramp realignment (Phase 2).

In addition, Caltrans recommends that the City in coordination with Caltrans identify ways to leverage investments in information and communications technology and related infrastructure to support both Transportation Systems Management and Operations strategies and other smart, connected community initiatives (e.g., sensors, communications networks, data).

Caltrans would like the MVCPU to consider removing the statement “This impact would remain significant and unavoidable” from all the “Freeway Segment Mitigation Measures.” In consideration of the community plan update, these details should be addressed by individual developments to study direct and cumulative impacts and mitigate a beneficial improvement to the community.

Encroachment Permits

Please be advised that any work (e.g. construction, vegetation management, drainage improvement, etc.), or traffic control that is conducted within or adjacent to or encroaches upon the State Right of Way (ROW) requires an encroachment permit issued by Caltrans. Compliance with CEQA must be completely addressed before an encroachment permit application is submitted to the District Encroachment Permits Office. Before an encroachment permit application package can be deemed complete, all applicable Federal and State statutory requirements including but not limited to Storm Water, Americans with Disabilities Act (ADA), and CEQA must be complied with.

Caltrans appreciates the continued coordination with SD City staff and community representatives on this community plan update. If you have any questions, please contact Trent Clark at (619) 688-3140 or by email at trent.clark@dot.ca.gov.

Sincerely,



MELINA PEREIRA, Acting Branch Chief
Local Development and Intergovernmental Review Branch

A2-6

A2-7

A2-8

A2-9

A2-10



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

March 22, 2019

File Number 3300300

Ms. Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123
dsdeas@sandiego.gov

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
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- Escondido
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- Vista
- and
- County of San Diego

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- 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

Dear Ms. Malone:

Subject: Mission Valley Community Plan Update (Project No. 518009) Draft Program Environmental Impact Report

Thank you for the opportunity to comment on the Mission Valley Community Plan Update (CPU) 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

The CPU project is in five Smart Growth Opportunity Areas (SGOAs) identified on the Smart Growth Concept Map: four Existing/Planned Town Centers (SD MV-1, SD MV-2, SD MV-3, SD MV-4), and an Existing/Planned Community Center (SD MV-6). 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 helps to minimize impacts to regional air quality, and supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Please continue facilitating access to planned transit routes and services within the plan area.

Freeway Impacts

The City of San Diego has previously worked with SANDAG and Caltrans to develop "fair share" mitigation strategies for freeway impacts. SANDAG requests that these strategies are consistent with the City's fair share policy, including connecting mitigation to any proposed transit within the corridor, including the Trolley (Blue, Orange, and Purple lines) and *Rapid* service along Interstate 15 and Highway 163.

A3-1

A3-2

A3-3

Climate and Electric Vehicle Planning

A3-4

Please consider incorporating robust electric vehicle (EV) charging infrastructure into the Mission Valley CPU and Draft PEIR to help mitigate greenhouse gas (GHG) impacts, while also supporting goals of the 2015 Regional Plan and the State of California for EV deployment and uptake. Electric, shared mobility services require fast charging points to support operations; please consider siting future EV charging stations at community destinations.

SANDAG also encourages the City to utilize resources from the Plug-in San Diego (Plug-in SD) program, which implements recommendations from the San Diego Regional Plug-in Electric Vehicle Readiness Plan. Plug-in SD provides a technical expert, known as “the EV Expert,” who is available to assist stakeholders in person, by email, or by phone. SANDAG encourages City staff to contact the EV Expert with any questions regarding EVs and/or EV charging stations at (866) 967-5816 or evexpert@energycenter.org.

A3-5

Furthermore, Plug-in SD prepared a Regional Needs Assessment Mapping Tool (Mapping Tool), which is an interactive web-based planning resource intended to help inform public EV charging infrastructure siting by identifying gaps in the existing public charging network. The Needs Assessment Methodology Report (Report) documents data sources, methodologies, and assumptions used to analyze publicly accessible EV infrastructure needs in the San Diego region today and into the future. The Mapping Tool and Report are available at sandag.org/pluginsd.

In addition, SANDAG supports the climate planning goals outlined in the City’s Climate Action Plan (CAP), adopted in 2015, and appreciates that one of the project objectives of the Mission Valley CPU is to meet the City’s CAP goals. As noted in the Draft PEIR, increasing residential and commercial density along transit corridors and within a Transit Priority Area will support the City in achieving its GHG reduction targets under the CAP. The CPU’s emphasis on planning for measures that support active transportation, transit mode choices, and smart technology also will further the City’s CAP goals.

A3-6

Transportation Demand Management

Please consider incorporating transportation demand management (TDM), parking management, and intelligent transportation system strategies into the Mission Valley CPU and Draft PEIR to help mitigate traffic and parking impacts. Please consider incorporating policies that encourage developers and property managers to integrate TDM strategies through the entitlement process. Please also consider developing a comprehensive parking management plan for the Mission Valley community plan area to help balance the parking demand. This could include reduced parking requirements in areas near transit, shared parking, priced parking, smart parking solutions, and designated curb space for rideshare passenger pick up and drop off.

A3-7

The SANDAG TDM Program, iCommute, can help the City promote regional TDM programs to employers and employees within the Mission Valley community plan area. This includes the SANDAG Vanpool Program, which provides a subsidy of up to \$400 per month for eligible vans; a Carpool Incentive Program with Waze Carpool; and the iCommute GO by BIKE Mini-Grant program, as well as other bike education services. More information on regional TDM programs is available at iCommuteSD.com.

A3-8

Other Considerations

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

- Designing for Smart Growth: Creating Great Places in the San Diego Region
- Parking Strategies for Smart Growth
- Trip Generation for Smart Growth
- Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region
- SANDAG Regional Parking Management Toolbox
- Riding to 2050: The San Diego Regional Bike Plan
- San Diego Regional Plug-In Electric Vehicle Readiness Plan
- Plug-in San Diego Regional Needs Assessment Mapping Tool

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

We appreciate the opportunity to comment on the City of San Diego's Mission Valley CPU Draft PEIR. If you have any questions, please contact me at (619) 699-1943 or at seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/nye



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Comment Letter A4

Rebecca Malone, Environmental Planner
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9485 Aero Drive, MS 413
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PlanningCEQA@sandiego.gov

Project Name: Mission Valley Community Plan Update
Project No.: 518009 / SCH No. 2017071066

San Diego State University (SDSU) appreciates the opportunity to comment on the Mission Valley Community Plan Update Draft Program Environmental Impact Report (MVCPD Draft EIR). We also want to thank you for referencing our proposed campus master plan in the section related to the Stadium site, as the California State University (CSU) is currently engaged in negotiations to potentially purchase the site.

A4-1

General Comments

SDSU is working on a plan for the redevelopment of the SDCCU Stadium site situated in Mission Valley as part of the SDSU Mission Valley Campus Master Plan proposed project, should the University acquire the site. The proposed project entails the acquisition, planning, construction, and operation of a new SDSU Mission Valley mixed-use campus, research park, and stadium to support SDSU’s education, research, entrepreneurial, technology, and athletics programs that can no longer be accommodated at SDSU’s existing 287-acre main campus. Specifically, the proposed project may include:

A4-2

1. approximately 84 acres of open space, including shared SDSU/community active and passive parks recreation fields, and approximately 34-acres of River Park; and pedestrian, hiking, and biking trails;¹
2. approximately 1.6 million square feet of campus uses for education, research, entrepreneurial, and technology programs;

¹ The City would remain the owner of approximately 34 acres of River Park. As required by San Diego Municipal Code section 22.0908, SDSU would revitalize and restore the River Park, which the City would retain in fee ownership.

3. construction of a new, multipurpose 35,000-capacity stadium and the corresponding demolition of the existing San Diego County Credit Union (SDCCU) Stadium (formerly, "Qualcomm Stadium");
4. approximately 4,600 residential homes for students, faculty, and staff, including market-rate, workforce, and affordable homes, in proximity to a vibrant university village atmosphere;
5. two hotels with approximately 400 hotel rooms to support campus visitors and stadium-related events, provide additional conference facilities, and provide academic opportunities for graduate and undergraduate students in SDSU's hospitality and tourism management program;
6. approximately 95,000 square feet of community-serving retail space to support campus, stadium, and related facilities;
7. trolley/transit opportunities to minimize vehicular traffic use by using the existing underutilized Metropolitan Transit System (MTS) Green Line transit station, accommodating the planned Purple Line transit station, and providing an enhanced pedestrian connection to the existing light rail transit center; and
8. associated infrastructure, utilities, facilities, and other amenities.

As part of the SDSU Mission Valley Campus Master Plan proposed project, CSU as lead agency would consider approval of the SDSU Mission Valley Campus Master Plan, which is the physical master plan to guide the future development of CSU facilities, based on academic goals and projected student enrollment levels, for an established time horizon. The new SDSU Mission Valley Campus Master Plan would accommodate 15,000 full-time equivalent students (FTES) over time, resulting in a total student headcount of approximately 20,000 students and resulting in approximately 1,900 total faculty and staff.²

We have been working closely with the City on the SDSU Mission Valley Campus Master Plan proposed project. The following comments are offered to facilitate and coordinate with the City, the MV planning group, and others with regard to the SDSU Mission Valley Campus Master Plan and the MVCPU.

² One full-time equivalent student is defined as one student taking 15 course units (which is considered to be a "full course load"). Two part-time students, each taking 7.5 course units, also would be considered one FTES; and, therefore, the total student headcount enrolled at the university is higher than the FTES enrollment. At buildout, SDSU estimates that when enrollment reaches 15,000 FTES at the SDSU Mission Valley campus, total students enrolled at that campus site would be approximately 20,000 students.

Specific Comments

A4-3

1. **Stadium Site.** The MVCPU Draft EIR states that redevelopment of the Stadium site will occur through a future Specific Plan or Campus Master Plan. This is accurate because SDSU's plan for redevelopment of the Stadium site includes a Campus Master Plan that will use the content requirements of a Specific Plan prepared pursuant to California Government Code section 65451, subdivision (a). Please confirm in the Final EIR.

A4-4

2. **Land Use Assumptions of the Stadium Site.** The MVCPU Draft EIR states: "The proposed CPU assumed that 4,800 dwelling units, two million square feet of office space, 300,000 square feet of retail space, 38.1 acres of active park, and 4.9 acres of open space would be developed on the Stadium site." (MVCPU Draft EIR, p. ES-3 fn. 1, p. 3-5 fn. 1.) However, we understand the MVCPU and its Draft EIR also assumed that a 40,000 +/- seat stadium, 450 hotel rooms and as many as 5,000 residential units would be part of the development of the Stadium site. Please clarify the MVCPU Draft EIR's land use assumptions for the Stadium site, and revise the footnotes found on pages ES-3 and 3-5 of the MVCPU Draft EIR to reflect the land uses assumed for the Stadium site.

A4-5

3. **Future Actions Associated with the Proposed CPU.** The MVCPU Draft EIR anticipates that future development would occur within the CPU area and be subject to applicable development regulations and requirements. The MVCPU Draft EIR includes a non-exhaustive list of discretionary actions that would occur as the proposed CPU is implemented, and includes — as a City of San Diego discretionary action — "Specific Plans (e.g. the future Specific Plan for the Stadium site)." (MVCPU Draft EIR, p. 3-13.) However, the Board of Trustees of the California State University (CSU) is the lead agency on the SDSU Mission Valley Campus Master Plan proposed project. Accordingly, please revise the Draft EIR to clarify the additional discretionary actions to be taken by CSU, namely potential certification of an EIR and approval of the SDSU Mission Valley Campus Master Plan project.

A4-6

4. **Planned Trolley Purple Line.** The MVCPU Draft EIR states that the SANDAG Regional Plan's planned Purple Line Trolley would provide a new north-south transit connection through the Stadium site and generally would parallel I-15. The MVCPU Draft EIR also states that the exact alignment of the Purple Line Trolley is not known at this time. (MVCPU Draft EIR, p. 4.9-39.) Figure 4.13-5, Planned Transit Facilities, shows a planned trolley Purple Line bisecting the Stadium site. (MVCPU Draft EIR, p. 4.13-49.) SDSU could accommodate the Purple Line as shown on Figure 4.13-5, but it has a strong preference for there to be a second alignment option. For purposes of transit ridership, cost, and minimizing impacts to the River Park, the best location and alignment for the planned Purple Line is adjacent to, and parallel with, the I-15. Please realign the Purple Line shown in MVCPU and its Draft EIR, so that it is adjacent to, and parallel with, I-15. Alternatively, at a minimum, please revise the MVCPU and its Draft EIR to reflect one or more proposed alignments, including the alignment proposed in this comment.

5. **Trolley Line Stations.** Please clarify the transit stations within Mission Valley that will serve the planned Purple Line and the planned Red Line. The text of the MVCPU draft Mobility Technical Report indicates that the Purple Line is planned to connect to the Stadium Station; however, Table 5.6 indicates that the Purple Line will connect to the Mission San Diego Station, which is immediately to the east of the Stadium site and the I-15. Please also clarify the Mobility Technical Report as needed.

A4-7

6. **Fenton Parkway Extension.** The MVCPU proposes a 4-lane bridge with a raised median connecting the southern terminus of Fenton Parkway to Mission City Parkway at Camino del Rio N. (See MVCPU Draft EIR, p. 4.13-31.) Based on the City's 2050 MVCP forecast, a 4-lane configuration appears to provide substantial excess capacity for a facility 30 years in the future. In addition, a median on the proposed Fenton Parkway bridge is not deemed necessary from an operational perspective and its elimination would reduce the overall bridge construction cost. Please also clarify the scale/size of the Fenton Parkway extension.

A4-8

7. **Lead Pedestrian Intervals.** The MVCPU Draft EIR lists intersections where Lead Pedestrian Intervals (LPI) are planned. (MVCPU Draft EIR, p. 4.13-58.) LPIs typically give pedestrians a 3–7 second head start when entering an intersection with a corresponding green signal in the same direction of travel. Please clarify whether the LPIs were incorporated into the MVCPU Draft EIR's intersection operations analysis.

A4-9

8. **New Sidewalks.** The MVCPU proposes sidewalk gap closures and enhancements throughout Mission Valley. (See MVCPU Draft EIR, p. 4.13-59.) We request clarifications with respect to the sidewalk facilities planned at the following three roadway segments:

A4-10

- a) Friars Road – Qualcomm Way to EB Friars Road off-ramp at Mission Village Drive (south side)
 - i. Please clarify this is the roadway segment intended to be referenced at page 4.13-60. A sidewalk is already present along this stretch of Friars Road. The intent may be to reference the stretch from Stadium Way to Mission Village Drive, where the sidewalk is made of asphalt instead of concrete.
- b) Friars Road – east of Mission Village Drive ramps to east of I-15 NB ramps (north and south side)
 - i. Please clarify whether sidewalk facilities are planned for both sides of Friars Road. Providing a sidewalk on both sides of Friars Road is deemed less necessary on the north side of the bridge over I-15 given the limited number of pedestrian attractions. Eliminating the sidewalk could reduce the need for any future bridge widening.
- c) San Diego Mission Road – Mission Village Drive to Rancho Mission Road (north side)

- i. Please also clarify the planned sidewalk facilities for this segment. Providing a sidewalk on the north side of San Diego Mission Road is deemed less necessary on the north side of the street because of the limited number of pedestrians expected to use this facility. This improvement would require widening of the bridge, and demand could be accommodated on facilities within the SDSU Mission Valley project site and by the existing sidewalk on the south side of the bridge.

A4-10

9. **Roadway Mitigation Measure Coordination.** The MVCPD Draft EIR identifies roadway mitigation measures in the vicinity of the Stadium site, but does not recommend them, because the City anticipates that the Stadium site will be studied further. The MVCPD Draft EIR concludes that because it is unknown whether the improvements would be compatible with anticipated future planning efforts for the Stadium site, implementation of the City's identified improvements could ultimately become obsolete. (See MVCPD Draft EIR, Appendix D, Transportation Impact Analysis, pp. 131-132, 138, 140-141.) SDSU will continue to work with the City to identify and implement feasible transportation mitigation measures applicable to the SDSU Mission Valley Campus Master Plan proposed project, recognizing that improvements may be required with or without the Campus Master Plan proposed project. As part of this process, SDSU requests the City provide the updated Mission Valley PFFP and Development Impact Fee program when available so SDSU may understand which circulation improvements are funded improvements and to help identify SDSU's fair share contribution to such improvements.

A4-11

10. **Friars Road Classification.** The segments of Friars Road from Ulric Street to Frazee Road, and Frazee Road to Mission Center Road, are referenced in some tables as having a classification of a 6-lane Prime Arterial and 7-lane Expressway (respectively), and in some as a 5- or 6-lane Major Arterial and 6-lane Prime Arterial (respectively). Please clarify the classifications of these Friars Road segments.

A4-12

11. **Signal Timing.** Please clarify the signal timings presented in the MVCPD Draft EIR Transportation Impact Analysis. Specifically, at the following signals, the signal timings coded in Appendix D of the Transportation Impact Analysis do not match our interpretation of the signal timing sheets, which are provided in Appendix B of the Transportation Impact Analysis:

A4-13

- a) River Run Dr & Friars Rd
- b) I-15 Northbound Ramps & Friars Rd
- c) Rancho Mission Rd & Friars Rd
- d) Fenton Pkwy & Rio San Diego Dr/Fenton Marketplace Dwy
- e) Texas St & Camino del Rio S

12. **Mitigation Measure MM-AQ-2.** The MVCPD Draft EIR provides that for a project that includes demolition of the existing stadium, implementation of Mitigation Measure MM-AQ-2 would ensure the reduction of demolition emissions to a level less than significant. Among other things, MM-AQ-2 states that "[e]quipment shall meet USEPA Tier 4 emission standards." While

A4-14

the SDSU Mission Valley Campus Master Plan proposed project will be subject to adopted mitigation measures set forth in that EIR and not mitigation measures identified in the MVCPU Draft Program EIR, to ensure consistency and feasibility of MM-AQ-2, please consider revising this mitigation measure to state Tier 4 equipment should be required “where available” or “if feasible.”

A4-14

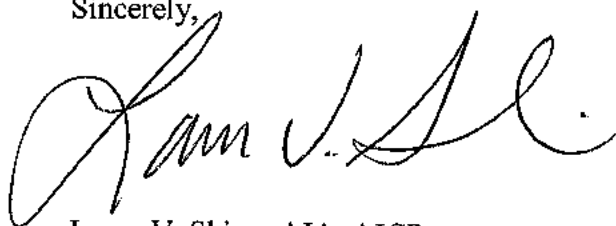
13. **Proposed Aquatics Complex.** The MVCPU notes that a Recreation Center will be located on the Stadium site and that an Aquatics Complex will be located “at a site to be determined within the Mission Valley community.” (MVCPU, Working Draft, Table 5, p. 72.) The MVCPU Draft EIR also notes that the Aquatics Complex location is to be determined. (MVCPU Draft EIR, p. 4.11-20.) However, Figure 4.11-3 of the MVCPU Draft EIR shows both a Recreation Center and an Aquatics Center situated on the same location at the Stadium site. SDSU has reserved space in its proposed development for a City-owned 25,000-square foot Recreation Center, which could include a swimming pool.

A4-15

14. **Water Supply Assessment.** Please confirm that the MVCPU Draft EIR Water Supply Assessment (WSA), Appendix E, anticipated the water demand associated with the SDSU Mission Valley project. Further, please provide the land use statistical breakdown of what was included for water usage at the SDSU Mission Valley project site.

A4-16

Sincerely,



Laura V. Shinn, AIA, AICP
Director, Planning
Planning Design and Construction
San Diego State University



U.S. FISH AND WILDLIFE SERVICE
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF
FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, California 92123

In Reply Refer To:
FWS/CDFW-19B0115-19TA0706

March 28, 2019
Sent electronically

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

Subject: Comments on the Draft Program Environmental Impact Report for the Mission Valley Community Plan Update, City of San Diego, San Diego County, California (Project # 518009, SCH # 2017071066)

Dear Ms. Malone:

The U.S. Fish and Wildlife Service (Service) and the Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the proposed Draft Program Environmental Impact Report (DPEIR) for the Mission Valley Community Plan Update (CPU), dated February 6, 2019 (project). On March 21, 2019, the Wildlife Agencies requested a 2-week extension to provide comments on the project; that same day, personal communication with City staff indicated that comments on the DPEIR could be submitted by March 28, 2019. The comments provided in this letter are based on information provided in the DPEIR and associated documents; information contained within the project NOP; related projects within the Mission Valley Community Plan Update (CPU); meetings and discussions with City staff; our knowledge of sensitive and declining vegetation communities in the County; and our participation in regional conservation planning efforts including the City's Multiple Species Conservation Plan Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The Department is a Trustee Agency and a responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA), and administers the Natural Community Conservation Planning (NCCP) program. The City is participating in the Department's NCCP and the Service's HCP programs through implementation of its SAP.

A5-1

The project analyzed in the DPEIR is the CPU, which is an update to the Community Plan that guides development of the entire Mission Valley community. The proposed CPU is a policy document that describes the community’s vision and identifies strategies for enhancing community character and managing change. The CPU includes goals, policies, and implementing actions to guide local decision-making and future public investments for the CPU area.

Development in Mission Valley will be guided and regulated through the proposed CPU, the City of San Diego Municipal Code (SDMC), the General Plan, and applicable Specific Plans. Specific development standards for projects within the San Diego River Park and Hillside Review areas in the CPU are also proposed to be codified in Chapter 13, Article 2, Division 14 of the SDMC as a Community Plan Implementation Overlay Zone (CPIOZ).

The 3,216-acre Mission Valley Community Plan area is located in the City of San Diego and is surrounded by several other community plan areas including Old Town San Diego, Uptown, Greater Northern Park, Normal Heights, Kensington-Talmadge, College Area, Navajo, Tierrasanta, Kearny Mesa, Serra Mesa, Linda Vista, and Mission Bay Park. The CPU is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and Interstate-5 (I-5) on the west. The San Diego River runs through the center of the community planning area. The CPU is within the City’s MSCP and approximately 341 acres are within the Multiple Habitat Planning Area (MHPA). The CPU area is mostly urbanized, but also supports coastal sage scrub, riparian woodland, riparian scrub, and freshwater marsh.

The Mission Valley Community Plan supports the following federally and/or state listed or species of special concern that are also covered species under the City’s SAP: San Diego ambrosia (*Ambrosia pumila*), least Bell’s vireo (*Vireo bellii pusillus*), southwest willow flycatcher (*Empidonax traillii extimus*), coastal California gnatcatcher (*Polioptila californica californica*), western spadefoot toad (*Spea hammondi*), yellow warbler [*Setophaga (=Dendroica) petechial*], tricolored blackbird (*Agelaius tricolor*), yellow-breasted chat (*Icteria virens auricollis*), Greater western mastiff-bat (*Eumops perotis californicus*), and Mexican long-tongued bat (*Choeronycteris mexicana*).

The Wildlife Agencies have concerns regarding the CPU’s consistency with the City’s SAP. The proposed CPU includes the addition of new roads in the San Diego River flood plain including the Levi-Cushman Street “B”, Street “J”, and the extension of Fenton Parkway. In addition, the CPU proposes to place five new pedestrian bridges across and new development immediately adjacent to the San Diego River. The DPEIR should not assume that a City Essential Public Projects ESL deviation process will be applicable to new roads or bridges as the CPU and DPEIR do not include enough information to fully analyze the potential effects of these facilities and these facilities were not originally contemplated in the City SAP. Therefore, we cannot concur with the conclusions in the DPEIR that impacts to biological resources and the MHPA from these facilities will be less than significant and no mitigation measures will be required. New roads, pedestrian bridges, and other developments should be reviewed individually for consistency with the City’s Biology Guidelines and Sections 1.4 and 1.5 of the City’s SAP.

The DPEIR should also demonstrate how the CPU will be consistent with Guideline B15 of the City’s SAP for Urban Areas (§ 1.2.3) that native vegetation shall be restored as a condition of future development proposals along the current Riverwalk Golf Course portion of the San Diego River. We recommend that wetland restoration be maximized at this location and that all development be at least 100 feet away from existing and/or restored wetlands.

A5-2

A5-3

A5-4

A5-5

Additionally, the CPU presents a prime opportunity and logical juncture to develop or require subsequent projects develop Area Specific Management Directives (ASMDs) as defined by the City MSCP SAP. ASMDs should conform to a previously approved (i.e., "final") Mission Valley Natural Resources Management Plan (NRMP). The NRMP is critical for ensuring compliance with the City's SAP. The Wildlife Agencies considers the development and adoption of the NRMP of such importance to the area's resource management and implementation of the City's SAP that the Department awarded a Local Assistance Grant providing State funds to the City in 2003 to complete the NRMP. Although a draft NRMP was prepared, the City has yet to revise, finalize, or implement the NRMP. The Wildlife Agencies continues to recommend that specific biological resource management objectives be implemented by the CPU through the finalization of the NRMP.

A5-6

Due to the constrained nature of the San Diego River and the limited opportunities to mitigate, it will be difficult to develop a Biologically Superior Alternative as part of a wetland deviation. Therefore, we encourage the City to consider alternatives that do not impact wetlands. However, if a deviation is required, the City should look towards restoring significantly disturbed, developed, or other non-wetland areas within the CPU boundaries thereby increasing the biological value of the San Diego River.

A5-7

The DPEIR identified Alternative 1 as the biologically superior alternative. Alternative 1 does not include the proposed roadway extensions of Street "J" and Fenton Parkway across the San Diego River, and biological impacts would be less than the proposed project. The Wildlife Agencies recommend the City adopt Alternative 1 for project approval, consistent with our other comments and recommendations.

A5-8

The Wildlife Agencies offer further comments and recommendations (Appendix) to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with all applicable requirements of the City's SAP.

A5-9

Thank you for the opportunity to comment on the subject DPEIR. If you have any questions, please contact Eric Weiss of the Department at Eric.Weiss@wildlife.ca.gov or 858-467-4289, or Patrick Gower of the Service at Patrick.Gower@fws.gov or 760-431-9440 ext. 352.

Sincerely,

DAVID
ZOUTENDYK

Digitally signed by
DAVID ZOUTENDYK
Date: 2019.03.28
15:46:31 -07'00'

for Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Gail K. Sevrens
Environmental Program Manager
California Department of Fish and Wildlife

APPENDIX

The U.S. Fish and Wildlife Service and California Department of Fish and Wildlife Comments on the Draft Program Environmental Report for the Mission Valley Community Plan Update, City of San Diego, California

1. The project description does not address habitat and biological factors within the **Community Plan Update’s** (CPU) planning area. The CPU includes areas of sensitive habitats and species, and the Wildlife Agencies urge the City to incorporate biological and resource management considerations into the project objectives to facilitate: a) consistency with the City’s Subarea Plan (SAP), and b) consistency with the CPU’s Notice of Preparation (NOP) scope of work. As originally circulated in the NOP, “[t]he updated Community Plan is anticipated to include policies and actions to ... enhance the San Diego River, and provide additional open spaces”. Omitting enhancement opportunities within the San Diego River and not providing additional open spaces or other measures to guide sensitive biological resource management within the CPU’s project objectives is a meaningful and significant departure from what was originally stated in the NOP. Inclusion of actions and policies to enhance the San Diego River and providing additional open spaces would prevent a shift in focus of the CPU from biological resource management, and from prioritizing fulfillment of/implementation of the City’s SAP.

A5-10

Project design elements or alternative project design elements should be sited to avoid impacts to previous mitigation sites. Figures within the **Draft Program Environmental Report (DPEIR)** should not depict design element alignments with the potential to impact mitigation sites as doing so suggests a final alignment (see the extension of Colusa Street and Via Las Cumbres in Alternative 2 for examples of elements that may impact mitigation sites). The concept of road extensions and other facilities should be introduced in the DPEIR, however, their alignments should be analyzed in a project-specific analysis. By illustrating specific alignments in the DPEIR, the document suggests that those alignments have already been optimally sited and may be construed as preempting the need for further analysis and/or biological resource protections.

A5-11

2. The Sensitive Biological Resources section Table 4.2-3 should be revised to denote species found during protocol survey as “observed” and not as “high potential”. In addition, southwest willow flycatcher should be added to the list of species that have been observed.

A5-12

3. Picnic areas and other public facilities that may generate trash should be placed as far from the San Diego River as possible to reduce the possibility of attracting predators to sensitive areas.

A5-13

4. The DPEIR refers to Figure 4.1-1, however, this figure is missing. The Final Environmental Impact Report should include Figure 4.1-1 or another figure that shows the two proposed Community Plan Implementation Overlay Zone areas in addition to the Multiple Habitat Planning Area A.

A5-14



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Feb 15, 2019

Email and Mail

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San Diego, California 92101
Attn: The Hon. Kevin Faulconer
Mayor of San Diego

San Diego City Councilman Scott Sherman
City Administration Building
202 C Street, 10th Floor
San Diego, California 92101

San Diego Planning Director Mike Hanson
City of San Diego Planning department
9485 Aero Drive MS 413
San Diego, California 92123

Mission Valley Community Planning Board
Board Chair: Jonathan Frankel
Committee co-chairs: Ms. Levental/Mr. Michajlenko

Re: Mission Valley Community Plan Draft EIR update

The Mission Valley Community Plan update has been in the planning stages over the last few years commencing approximately 3 years ago. Over the planning time frame we have experienced ongoing changing needs in the region including the exodus of the SD Chargers vacating the SDCCU Stadium site, regional, City and Mission Valley economic and infrastructure improvements, homeless, SD River Park master plan and the significant need for all types of housing including work force housing to meet the need of both maintaining existing businesses and our ability to recruit the quality new businesses for our City and the Region.

B1-1

The Mission Valley Community Draft Plan has focused primarily on changes to the zoning north of I-8 to Friars Road ignoring the residential opportunities with mixed use development South of I-8 especially along Camino del Rio South between Mission Center Road and QUALCOMM Way/Texas Street. This

B1-2



location offers an ability to accommodate mixed use zoning allowing redevelopment to include existing uses along with residential. A mixed use redevelopment generating much needed work force housing with retail, commercial and other community uses creates an active urban destination 24 hours a day.

B1-2

The Draft Master Plan has designated that Camino Del Rio South include an upgraded bike lane and pedestrian connections which are both residential elements to help connect the South to the North. Redevelopment mixed use residential projects could also be part of a shuttle system connecting the south to the north with a loop with Mission Center to the west, Camino de la Reina to the north, QUALCOMM Way to the East and Camino Del Rio South. This loop would connect to the SD Trolley at the Mission Valley Center Station and bus stops with stops at Mission Valley Shopping Center. Years ago-the Mission Valley Auto Circle Dealers had a shared shuttle system similar to this that picked up customers and took them to the shopping centers in Mission Valley – this worked quite well.

B1-3

DDI is representing both Marvin K Brown Auto Center (MKBAC) at 1441 Camino Del Rio South and John Hine Mazda (JHM) at 1545 Camino Del Rio South to assist them in the community plan update incorporating a zoning category that will allow them to financially redevelop their properties. Nationally and Regionally the Auto retail industry is going through a significant financial downturn. Manufactures are placing new RETAIL brand standards to meet the evolving demographic customer showroom and sales design requirements. More and more customers are shopping online and know what they want before they walk in the doors and don't spend a lot of time walking around the dealership's inventories as before. To stay competitive and retain the Manufacture contracts to represent the auto brands, dealers are required to redevelop the older facilities into the newer requirements. Both MKBAC and JHM will have to spend significant dollars to upgrade their existing facilities. As part of the redevelopment requirements both dealerships want to be able to create a broader highest and best use for their Mission Valley property developing mixed use projects that will transcend the existing facilities into vibrant live, work, play projects. This would not only improve the quality of life in Mission Valley but also activate the Camino Del Rio South properties from Texas St. to Mission Center Road with retail, residential and commercial uses.

B1-4

The California New Car Dealers are driving the California Economy. New Car dealers in California in 2018 had \$123.06 Billion of sales with around a \$1.5 Billion of sales taxes. The statewide payroll to dealership employees is approximately \$8.56 Billion.

B1-5

Dealers play an important role in the state as local businesses and civic leaders including but not be limited to:

- | | |
|---|------------------|
| 1. Total taxes collected or paid | \$9.38 Billion |
| 2. Total spent for products and services from other California businesses | \$2.74 Billion |
| 3. Donations to charitable and civic organizations | \$ 49.28 million |
| 4. Local jobs both direct and indirect | |

San Diego and Mission Valley can have significant financial benefits from auto dealerships as outlined above. To stay competitive and redevelop their properties per the Manufacturer standards, Dealers will be dependent on the zoning incorporated into the draft community plan update to allow for mixed use



projects incorporating the much needed housing zoning with new height limits similar to the existing Sheraton Hotel, Farmers Insurance Building, Hilton Hotel to name a few to create density while achieving open space urban design amenities like pocket parks.

Due to tremendous changes in the retail auto industry, Dealers will likely not require the amount of acreage going forward as in years past. With online shopping and special order vehicles, customers are learning a new way to shop for cars which allows them to look online at the manufacturer's websites and design and build the car they want. This trend will reduce the need for Dealers to have hundreds of cars on their lots over many acres for customers to select from. In many cases now, the customer will design and build what they want and place an order through the dealer – and are called when the car arrives. This creates a perfect situation for both Mission Valley and the Dealers to expand the current use for their properties to allow for mixed use and help with the housing issue.

California and the rest of the country have many award winning and financially successful new auto mixed use projects that would help transcend their existing dealerships into the next generation of a business model that can continue to grow the local tax revenues, provide important jobs, and contribute to the much needed housing for the City and region.

To summarize, we ask that the mixed use designation be included in the sector from Mission Center Road to Texas Street along Camino Del Rio South to allow for a SMART mixed use Retail, Housing and Commercial redevelopment to include the two existing Auto properties at 1441 and 1545 Camino Del Rio South.

We welcome the opportunity to meet with City Planning and the Mission Valley Planning Group Board to be able to include best practices zoning for south of I-8 between Mission Center and Texas Street. Please call (619-977-7757 cell) or email (pdealy@dealydev.com) at your earliest convenience.

Sincerely,

Perry M. Dealy

President CE)

Dealy development, Inc.

cc: Mr. John Hine

Ms. Jennifer Brown

Mr. Paul Robinson

Jacobs Vernon Project, LLC
1904 Hotel Circle North in Mission Valley
(APNs 437-350-05-00 and 437-350-06-00).

Comments to Mission Valley Community Plan Update Draft EIR
SCH # 2017071066 dated 2/6/2019

Our Client has initiated its withdrawal from the Atlas Specific Plan (with no project identified) in anticipation of the City's adoption of the staff recommended MVCPU and the staff proposed RMX zone (see Project Number 523313).

B2-1

In reviewing the Draft EIR Proposed Implementation Section 3.3.3, and the Land Use Section 4.8, it does not appear that there is a comparison or environmental analysis between the land uses as currently authorized by the Atlas Specific Plan for our client's property vs. the proposed MVCPU land uses (MDMU) and the anticipated RMX Zone for our client's property. Please include this discussion and analysis in the response to comments.

The buildout projections within Section 3.4.1, and the accompanying impact analysis within the DEIR should take into consideration our clients pending application to withdraw from the Atlas Specific Plan and then develop their property pursuant to, and consistent with, the MVCPU and the proposed RMX zone utilizing the CPIOZ Type A process. In your response to comments, please include a discussion of the Jacobs Vernon Project LLC's withdrawal from the Atlas Specific Plan in, a) the Implementation Framework Section 3.3.3, b) the Regulatory Setting Section 4.8.1.2 and c) the Impacts Section 4.8.2.3 -- Conflicts with Applicable Plans.

While we understand the reasons for an abbreviated description of Atlas Specific Plan on pg. 4.8-12, the short paragraph is not complete or accurate. Further, the brief references to the amendments on Legacy and

B2-2

Town & Country do not mention the actual removal/withdrawal of the property from the Atlas Specific Plan in 2017.

B2-2

The language incorporated into the Legacy International and Town and Country Planning Commission Staff report and EIR specifically address the inability for the Atlas Specific Plan to be implemented as planned due to Atlas bankruptcy and the selling off of properties to separate owners (see Planning Commission staff report dated 5/4/17 -- PC 17-032 and specifically the excerpt below).

Community Plan Analysis:

The project site is within the MVCP, the City's adopted land use plan for this area. The MVCP designates the property as Commercial Recreation. The property is zoned MV-M/SP, in anticipation that the property would develop with multiple uses through a Specific Plan. In 1988, the City approved the Atlas Specific Plan, which included the subject property as the "Town and Country" site. The Atlas Specific Plan allows for an additional 1,340 hotel rooms and 171,000 square feet of banquet facilities on the Town and Country site beyond existing development, for a total of 2,300 hotel rooms and 229,000 square feet of banquet facilities.

The Atlas Specific Plan sought to leverage the development of seven noncontiguous properties, which were all owned by the Atlas Hotel Group. The plan was designed to coordinate their development, including a phasing of public facilities to support the planned development. Since the adoption of the Atlas Specific Plan, the Atlas Hotel Group filed for bankruptcy and as a result of that action all seven properties in the Atlas Specific Plan were sold to different owners. With the properties under separate ownership, the realization of the Atlas Specific Plan is likely no longer feasible because the plan relied on coordinated phasing across the properties to be economically viable. In recognition that this plan will never come to fruition, City staff recommended to the applicant to prepare a community plan amendment to remove the subject property from the Atlas Specific Plan, amend the land use designation to Multi-Use, and request a rezone of the property to the Multiple Use zone, which is the zone consistent with the Multi-Use designation in the MVCP.

Furthermore, there is language in the PC 17-032 staff report regarding the inconsistency between the recommended Atlas Specific Plan river channel and floodway improvements and the more recently adopted San Diego River Park Masterplan (2013).

B2-3

In the response to comments please address and analyze any conflicts or potential environmental impacts associated with the MVCP implementation as compared to the Atlas Specific Plan implementation including, if any, owner required dedications, offsite improvements,

B2-4

(and/or contribution requirements to on or off site public improvements, facilities, or infrastructure).

B2-4

We assert that withdrawal of our client's property from the Atlas Specific Plan and any future development that is consistent with the MVCPU and RMX Zone will in fact resolve the inconsistencies, and will not result in any adverse environmental impact. We seek City concurrence re: this conclusion in the response to comments.

Traffic, Transportation, and Circulation comments

B2-5

On Figure 4.13-4 CPU Roadway Network, New Street "J" appears to first start as 4 Lane Major from Friars to Riverwalk Drive, then become 2 Lane Major from Riverwalk Drive to Levi Cushman Street "B", then return to a 4 Lane Major from Levi Cushman Street "B" to Hotel Circle South. However, Street "J" was previously represented to be a 2 Lane Major from end to end. The graphic is not accurate or consistent. Please correct the graphics accordingly.

The alignment of Street "J" is also not depicted correct. It is drawn westerly and away from the intended crossing that ultimately terminates within the City accepted ROW at the 1660 Hotel Circle North westerly parking lot (see below).

While we realize that this exhibit is conceptual and likely not to scale, please confirm that Street "J" will be 2 lanes from end to end, and that the alignment will be consistent with, and outside of our client's property within the IOD 1987 RR-268370 (which was accepted by the City on 4/17/17 and recorded as Document 2017-0185066).

An accurate description of new street J on page 4.13-31 needs to be included (as referenced above) and the graphics depicting new Street J need to be corrected consistent with the City accepted street ROW referenced above.

March 22, 2019

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

Re: Mission Valley Community Plan Update Draft PEIR Comments

Dear Ms. Malone:

On March 20, 2019, the Riverwalk Ad Hoc Subcommittee of the Linda Vista Planning Group (LVPG), took up a review of the Program Environmental Impact Report (PEIR) associated with the Mission Valley Community Plan Update draft (CPU) and approved the following comments.

First, by way of background, given that the proposed Riverwalk development is situated along Friars Road, a shared border of the Mission Valley and Linda Vista Community Planning Areas, the Linda Vista Community stands to be greatly impacted by the proposed CPU as it concerns the Riverwalk development area. Therefore, on November 24, 2014, the LVPG created the Linda Vista Riverwalk Ad Hoc Subcommittee to work with the Mission Valley Planning Group and the developer on issues of mutual community interest such as traffic, parking, pedestrian access and safety, and other relevant planning matters, and to make regular reports to the LVPG. The Subcommittee has since been actively engaged in meetings and workshops on the development of the Riverwalk site.

In its ongoing effort to represent the interests of the Linda Vista Community, the Ad Hoc Subcommittee submits this comment letter on the PEIR. Because the PEIR fails to adequately inform of the likely effects of the proposed CPU, offer meaningful mitigation, and indicate a range of reasonable alternatives to the proposed CPU, it should be rejected until such time that it is brought into conformance with CEQA standards.

1. The PEIR Does Not Meet Its Mandated Purpose Under CEQA

“The basic purpose of an EIR is to ‘provide public agencies and the public in general with detailed information about the effect [that] a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be

B3-1

B3-2

minimized; and to indicate alternatives to such a project.’ ” (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 511 (*Sierra Club*)). “ “The EIR is the heart of CEQA” and the integrity of the process is dependent on the adequacy of the EIR.’ ” (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 924.)

“But the question whether an agency has followed proper procedures is not always so clear. This is especially so when the issue is whether an EIR's discussion of environmental impacts is adequate, that is, whether the discussion sufficiently performs the function of facilitating ‘informed agency decisionmaking and informed public participation.’ ” (*Sierra Club, supra*, 6 Cal.5th at pp. 512–513.)

“The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail ‘to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.’ ” (*Sierra Club, supra*, 6 Cal.5th at p. 516, footnote omitted.)

The mobility and land use analyses contained in the PEIR do not adequately address the underlying issues of density, affordable housing, trolley ridership, reliance on the automobile, traffic impacts, and parking requirements in the 30-year horizon of the proposed CPU. Further, the PEIR does not adequately address the newly proposed Street “J” for its impact on the San Diego River. The PEIR fails to address mitigation of significant impacts. Perhaps most significantly, the PEIR fails to meet the CEQA mandate in its omission of a reasonable range of feasible alternatives to the proposed CPU.¹

2. Mobility and Land Use Within the CPU: The PEIR Does Not Adequately Analyze Impacts or Provide For Mitigation

The City’s General Plan has established a City of Villages strategy. Under this strategy, a village is described as the “mixed-use heart of the community” where “ ‘personal transportation choices’ ” are increased and there is an acknowledgment of “ ‘the needs of people traveling by transit, foot, and bicycle, *as well as the automobile.*”” (PEIR at 4.4-19, citing the

¹ The absence of comment on any particular topic in the PEIR should not be construed as tacit approval of the analysis or methodology utilized.

City's General Plan Mobility, italics added.) Significantly, mobility and its improvements are brought about by a “*balanced, multimodal transportation network.*” (*Id.* at 4.4-18, citing the City's General Plan Mobility, italics added.) To be sure, in keeping with balance and the needs of the people, the automobile is not completely abandoned as a component in the implementation of the City of Villages strategy.

The PEIR fails to adequately address these principles in its discussion of mobility and land use. It ignores the balance called for by the City and assumes that vehicle usage does not warrant mitigation measures over the 30-year horizon of the proposed CPU. For example, the PEIR finds that under the proposed CPU, “significant cumulative impact” will result in Linda Vista in transportation on Morena Boulevard and Via Las Cumbres. Yet the PEIR promotes the exclusion of mitigation measures because such measures would require automobile-related improvements. (PEIR at 4.13-35, -38.) This analysis fails to factor in the balanced transportation network contemplated by the General Plan and is insufficient in providing for mitigation of significant impacts.

The PEIR also fails to address the impact of spillover parking resulting from reduced parking or no parking in transit priority areas and particularly the streets of Linda Vista as the southern boundary of that community is directly adjacent to the Riverwalk development area. This boundary is already typically at full capacity with on-street parking. For example, the CPU Final Mobility Existing Conditions Report indicates that the segment on Friars Road from Colusa to Fashion Valley Road has a high rate of on-street parking occupancy of over 85%. (Existing Conditions Report at p. 239.) This segment of Friars Road is accommodating residential parking from existing units. Permitting reduced parking or no parking in this development area will only add to the already high rate of on-street parking occupancy. Compounding these issues, the proposed re-striping of Friars Road to a five-lane major arterial along this segment calls into question the viability of maintaining the existing on-street parking. (CPU, Figure 14 at pp. 62-63.) If that segment of on-street parking was to be omitted by the reclassification of Friars Road, high parking occupancy will be displaced and will only be pushed further into the Linda Vista community. These possible impacts are not adequately addressed in the PEIR.

While the PEIR fails to address mitigation of significant transportation and parking problems the proposed CPU will create on the roadways of Linda Vista, it concludes that the impacts from increased density proposed are “less than significant.” Currently, Mission Valley’s Community Plan allows up to 73 dwelling units per acre. (MVCP at p. 42.) By base year 2012, 11,240 multi-family housing units were developed, and given buildout in the horizon year of 2050, a total of 39,160 units are allowed to be developed. (PEIR, Appendix B, Buildout Methodology, Table B-2.) By contrast, under the proposed CPU, buildout in the horizon year 2050 allows for an additional 27, 910 units to be developed, for a total buildout of 67,070 units, allowing for an increase of 248%. (*Ibid.*)²

With much greater density proposed, a well-reasoned and informative impact analysis should include the impact of the population growth, additional vehicles associated with that growth, and concomitant mitigation measures. Instead, the PEIR works around such analysis and refers to the CPU as largely “self-mitigating.” (PEIR at 4.13-29, -39.) For example, the PEIR mentions that regulations and the use of cleaner technology will help to reduce Green House Gas (GHG) emissions created by vehicles but still assumes overall that dramatically fewer vehicles will be impacting the environment because the intensive density focuses around transit areas and, therefore, any GHG emissions impact is “less than significant.” (PEIR at 4.4-16, -17.) The PEIR also touts the intensive density in transit priority areas as consistent with the City’s Climate Action Plan (CAP) goals but presents no analysis of a trolley ridership study to support that logic. (PEIR at 4.4-20, -21.)

Further, the PEIR does not fairly consider the state, regional, and local trends that support the production of electric vehicles and the availability of electric charging stations, which would make vehicle ownership more attractive to an environmentally conscious resident and the trolley less attractive as a primary mode of transportation. As this clean technology

² In order to fully realize this increase, the proposed CPU allows a total residential high density of 109 dwelling units per acre for residential and 140 dwelling units per acre for high density mixed use. (CPU at pp. 26-27.) As to the Riverwalk development site, the proposed CPU’s maximum allowances potentially increase the Riverwalk developer’s stated 4,300 units by approximately 50% to 100%, depending upon whether the dwelling units are residential or mixed use. Stated differently, the proposed CPU potentially allows a total residential density of 6,322 units (109 DU/Acre at 58 acres) and a total mixed use density of 8,120 units (140 DU/Acre at 58 acres). (CPU at pp. 26-27.) A combination of the two would presumably fall somewhere between.

gains even greater momentum, the PEIR has missed a significant opportunity to analyze the impacts on mobility in the CPU area. The PEIR also fails to acknowledge that while an unknown percentage of residents may use transit for work or school, such usage does not preclude that they will also own vehicles and, realistically, more than one vehicle per unit in a market rate multi-family housing setting. It is unreasonable to assume without study that a significant number of residents housed in such units will not require personal vehicles to carry out other aspects of their daily lives and that, due to other factors, such as the geographical limitations of the bus and trolley systems, traveling at night, and traveling with children, the practicality of trolley ridership is diminished. Indeed, trolley ridership is a central component of the City's goals and the public's multibillion dollar investment in the trolley. But the PEIR assumes that residents will for the most part abandon their cars over the next 30 years without analyzing the possible impacts of a community that actually maintains a greater reliance on the automobile than expected.

B3-7

The premise of a public transit-reliant community would have a stronger foundation if affordable housing was a requirement of more intensive density around transit areas. The PEIR recognizes that affordable housing regulations are intended to provide a "balance of housing opportunities." (PEIR 4.8-15.) Given the importance of this issue and the recognition of the value added to the land when intensive density development is allowed, an increase in the City's minimum 10% inclusionary housing requirement is being taken up by City Council members to achieve greater balance in housing affordability. Because the CPU expressly emphasizes its priority for housing in transit areas, and it is more likely that low- to median-income residents are more apt to either (1) not have vehicles or (2) give them up (and the related expenses) in exchange for proximity to the trolley, the community should not forfeit the opportunity to capture the value of its investment in the trolley; an increased inclusionary housing requirement should be part of development, and especially large-scale development in transit areas, under the proposed CPU. At that point, the PEIR could engage in adequate analysis of the land use designations as those designations relate to mobility.

B3-8

However, notwithstanding the City's anticipated improvements in mass transit, including a new MTS station at the Riverwalk site, and the City's newly proposed no parking requirements for development near transit, there is no substantiation for the proposition that

B3-9

people, especially those in market-rate housing, will give up their cars. The PEIR is inadequate and fundamentally flawed because it assumes too much about trolley ridership --without critical analysis-- and ignores the reality of vehicle ownership over the 30-year horizon. The density proposed in the CPU is not adequately reconciled as having less than significant impacts. Traffic impacts, air quality, GHG, and noise all factor into intensive density. In this regard, the PEIR does not “sufficiently perform[] the function of facilitating ‘informed agency decisionmaking and informed public participation.’ ” (*Sierra Club, supra*, 6 Cal.5th at pp. 512–513.) Absent adequate study of trolley ridership, the PEIR should not be certified.

B3-9

3. The PEIR Newly Proposed Street “J”

Newly proposed Street “J” is addressed separately in this comment letter for its direct impacts on the San Diego River. The PEIR explains that it rejects the Via Las Cumbres extension as “infeasible.” (PEIR at 6-3.) The alternative north-south high water crossing known as Street “J” “would eliminate the need for an elevated roadway within the core of the Mission Valley community.” (*Id.* at 4.13.3, 6-2-6-3.)

B3-10

The PEIR explains that Street “J” provides the desired connectivity under the CPU, and notably, addresses the public safety considerations associated with developing in a floodplain. (PEIR at 4.13.31, 6-29.) However, the PEIR does not adequately analyze the possible impacts, or any mitigation of its impact, on the San Diego River. The PEIR acknowledges this new crossing at the San Diego River has “the potential to increase flooding, erosion, or siltation by direct alteration of the river” but only defers generally to adherence to the City’s drainage and floodplain regulations to ensure less than significant impact. (PEIR at 4.7-23.) The biological resources impact of Street “J” is briefly addressed in Alternative 1, which presents the CPU *without* Street “J.” Alternative 1 states that the removal of Street “J” over the San Diego River “would reduce potential impacts [on] biological resources.” (PEIR at 6-23.)

The newly proposed Street “J” raises serious impact concerns that are not adequately addressed by the PEIR.

4. The PEIR Fails To Provide a Reasonable Range of Feasible Alternatives

B3-11

The PEIR offers (1) No Project Alternative; (2) Alternative I, which differs from the proposed CPU by not providing for new north-south roadway extensions across the San

Diego River; and, (3) Alternative 2, which differs from the proposed CPU by providing for the north-south Via Las Cumbres extension that would result in a bridge over the trolley track and across the San Diego River. (PEIR 6.2-6.4.) The PEIR deems Alternative 1 as the “environmentally superior alternative.” (PEIR at 6.5, 6-38.)

B3-11

The proposed CPU describes “medium” density alternatives to the high density residential and mixed use models it promotes. (CPU at pp.26-27.)³ However, the PEIR fails to address *any* alternatives, or combinations thereof, that allow for less overall density. This omission in the PEIR renders it incomplete as an alternative that provides for less intensive density would fall within the range of reasonably feasible alternatives, remain consistent with the City’s General Plan and goals under CAP, and allow for informed decisionmaking. (*Sierra Club, supra*, 6 Cal.5th at pp. 511–513.) Accordingly, the PEIR cannot be certified without providing for an analysis of an alternative that allows for less density.

B3-12

Conclusion

As discussed, the PEIR fails in its analysis of the impacts anticipated by substantial increases in density, less parking, and the continuing desire, if not need, of the people for vehicles. The PEIR fails to identify an alternative to the proposed CPU that provides for decreased density (and presumably less vehicles), and a study of impacts under that scenario. The potential impacts on biological resources caused by proposed Street “J” require analysis. The PEIR should be resubmitted for further adequate and balanced study of the possible impacts of the CPU as proposed and the additional alternative to it that provides for decreased density.

B3-13

Respectfully submitted,

Felicity Senoski
Linda Vista Planning Group
Riverwalk Ad Hoc Subcommittee Chair

³ “Residential medium” density allows for 44-73 dwelling units per acre with height limits controlled by zoning and “mixed use medium” density allow for up to 85 dwelling units per acre with no height limits. By contrast, “residential high” density allows for 73-109 dwelling units per acre with height limits controlled by zoning and “mixed use high” density allows up to 140 dwelling units per acre with no height limits. (CPU at pp. 26-27.)

MISSION VALLEY PLANNING GROUP

March 22, 2019

Mrs. Nancy Graham
Development Project Manager
City of San Diego, Planning Department
9485 Aero Dr., M.S. 413
San Diego, CA 92123

Mrs. Graham:

Enclosed please find comments on the draft program environmental impact report associated with the Mission Valley community plan update.

The attached comments are the product of three meetings of the standing subcommittee on the community plan update. Each comment was considered by the board of the MVPG at the special meeting of March 20, 2019. Subsequent to the review of these comments, the board voted unanimously to approve transmission of the comments to the City.

Contributions to these comments have been made by over a dozen board members and many members of the public.

Thank you for the opportunity to present these comments. We look forward to the City's responses and our continued work together on the community plan update.

Sincerely,



Jonathan Frankel, Chair
Mission Valley Planning Group

B4-1

MISSION VALLEY PLANNING GROUP

Comments on the Community Plan Update Program DEIR

March 22, 2019

1. Alternatives

- a. The DPEIR fails to analyze a reasonable range of alternatives that could substantially reduce impacts associated with the proposed project. CEQA mandates that “an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would *avoid or substantially lessen* any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” (CEQA Guidelines §15126.6, subd. (a), emphasis added.) The DPEIR includes three alternatives to the proposed project. The two substantive alternatives (Alternative 1 and Alternative 2) presented in the DPEIR do not avoid or substantially lessen any of the identified significant impacts of the project. In fact, the DPEIR concedes “Alternative 1 and the proposed CPU would each have the same number of significant impacts, while Alternative 2 would result in *greater* significant and unavoidable impacts.” (DPEIR, Page ES-5, Section ES.1.6; emphasis added). As such, the DPEIR fails to consider a reasonable range of alternatives, as required by CEQA, because the two substantive alternatives provided either result in the same or greater impacts as the proposed project. Additional alternatives must be analyzed that present a reduced intensity/development scenario in which the significant and unavoidable impacts of the proposed project are significantly lessened or avoided. Analysis of reduced intensity alternative(s) will provide decision makers “with information about how most of the project’s objectives could be satisfied without the level of environmental impacts that would flow from the project.” (Watsonville Pilots Ass’n v. City of Watsonville, 183 Cal. App. 4th 1059 (2010)). Further, the “actual infeasibility of a potential alternative does not preclude the inclusion of that alternative among the reasonable range of alternatives.” (California Native Plant Society v. City of Santa Cruz 177 Cal.App.4th 957, 981, 999–1000 (2009)). For example, the PDEIR may consider the effect of possible land use scenarios that would reduce the amount of planned residential, commercial or retail uses within Mission Valley.

B4-2

2. Biological Resources

- a. Proposed roadway alignments within the Community Plan Update will cross the San Diego River (e.g. J Street and Fenton Parkway). These projects will have undefined environmental impact not analyzed within the Program DEIR. The PDEIR should make clear which projects are subject to future supplemental analysis and which projects (i.e. ministerial) will not need to do any future studies

B4-3

<p>associated with impacts to the San Diego River or biological resources. If no future analysis of impacts to the river will be conducted, the PDEIR must include an analysis of cumulative impacts associated with the proposed river crossings at Fenton Parkway and Via Las Cumbres.</p>	B4-3
<p>b. The San Diego River is the defining natural feature and a treasured public resource within the planning area. As such, the PDEIR project objectives should be revised to include an objective related to the preservation, restoration and enhancement of the San Diego River.</p>	B4-4
<p>3. <u>Land Use</u></p>	B4-5
<p>a. The Land Use Section asserts that implementation of the proposed Land Plan will not have significant impacts however the supporting analysis is vague. Section 4.8-3 notes that future private Development projects are expected to comply with development regulations; however certain public projects that are clearly community and regional facilities (e.g. roadways, parks) should be analyzed as stand-alone projects by the City. Please provide additional data, such as the estimated impacts to the MSCP and the river.</p>	B4-5
<p>b. The proposed land use plan limits mixed-use land development on the South side of Interstate-8 corridor precluding residential uses and undermining general plan policies related to housing. The Community Plan Update should consider additional pedestrian crossings or circulators connecting the South side of I-8 with Central Mission Valley. The Community Plan Update should be amended to allow for mixed-use land development on the South side of I-8 between Mission Center Rd and the I-15 freeway.</p>	B4-6
<p>c. The Program DEIR fails to analyze alternate land use plans which may result in mitigatable thresholds for traffic, air quality, GHG and noise.</p>	B4-7
<p>d. To ensure full disclosure and public awareness of the proposed changes in land uses throughout the planning area, the PDEIR should include a table highlighting the projected changes in residential, commercial, retail, parks and other land uses as compared to existing conditions. This table was included in the draft community plan.</p>	B4-8
<p>4. <u>Transportation</u></p>	B4-9
<p>a. The DPEIR fails to include SB 743 and the adopted CEQA guidelines related to VMT within the relevant regulatory setting (Section 4.13.1.2 of the DPEIR). Further, the DPEIR fails to include recent technical advisories from OPR in the regulatory setting section (Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018) related to the proper evaluation of transportation impacts SB 743, OPR technical guidance, and CEQA guidelines</p>	B4-9

section §15064.3 are relevant regulatory authority and these sections should be included in the regulatory setting section of the Transportation chapter.

B4-9

- b. The DPEIR fails to use a permissible threshold of significance for evaluating transportation impacts. The transportation chapter of the DPEIR relies solely on level of service (“LOS”) to evaluate transportation impacts associated with the proposed project. Public Resources Code §21099(b)(2), which serves to implement SB 743, states: “Upon Certification of the guidelines by the secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestions *shall not* be considered a significant impact on the environment pursuant to this division...” (emphasis added). The secretary of the Natural Resource Agency certified new guidelines related to evaluation of transportation impacts on December 28, 2018. These adopted CEQA guidelines make clear that “A project’s effect on automobile delay shall not constitute a significant environmental impact” (CEQA Guidelines §15064.3(a).) Further, “Generally, vehicle miles traveled is the most appropriate measure of transportation impacts” (CEQA Guidelines §15064.3(a).) As such, the DPEIR cannot solely rely on LOS as a threshold of significance and must consider the use of VMT or other thresholds for evaluating transportation impacts.

B4-10

- c. The DPEIR fails to include any analysis regarding the feasibility of implementing mitigation measures (“MM”) TR-1 through TR-41. The transportation section identifies 41 mitigation measures that could reduce transportation impacts to insignificant levels but concludes none of these MM will be implemented because they are not “appropriate for the roadway network” due to potential conflicts with the General Plan, CAP and Community Plan policies associated with walkability and bicycle usage. Determining the “appropriateness” of a mitigation measure is not the City’s obligation under CEQA. CEQA requires “[e]ach public agency [to] mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so” (Pub. Resources Code, § 21002.1, subd. (b)) and to discuss feasible methods of mitigation in the EIR (id., § 21100, subd. (b)(3); CEQA Guidelines, § 15126.4, subd. (a)(1); see also Pub. Res.Code, § 21002.1, subd. (a) [one purpose of the EIR is “to indicate the manner in which significant effects can be mitigated or avoided”]). If no mitigation measures are feasible, the EIR must say so. (Guidelines, § 15091, subd. (a)(3).) As such, the DPEIR must include an analysis of MM-TR-1 through MM-TR-41 to assess if and whether the identified mitigation is feasible. For purposes of CEQA, feasible means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines §15364). Currently, the DPEIR includes only a conclusory statement that all 41 mitigation measures conflict with pedestrian and bicycle policies found within various regulatory documents. As such, the City effectively concludes, without any particularized analysis of the identified mitigation measures, that all identified MM are legally

B4-11

infeasible. Perhaps this would ultimately be true, but the DPEIR includes no analysis of each MM and its potential conflict with an applicable policy related to walkability or bicycle usage. It may be the case that implementation of some roadway improvements would not be mutually exclusive with the construction of planned pedestrian and bicycle facilities. Without a complete analysis of each MM within the context of these policies, it is improper to conclude that the 41 identified MM are infeasible. Furthermore, the analysis in the DPEIR must discuss the “economic, environmental, social and technological” factors related to the feasibility of MM-TR-1 through TR-41. A singular focus and discussion of the legal barriers to implementation does not provide the analysis required by CEQA. Finally, if the PDEIR has identified legally infeasible mitigation measures, the City must work to identify mitigation that is feasible and can reduce transportation impacts below a level of significance. Or, the City must disclose no feasible mitigation exists. For example, feasible mitigation could require future development to offer free or subsidized transit passes, transportation demand management (“TDM”) features or other transportation amenities.

B4-11

d. The PDIER does not include reference to a facilities financing plan (“FFP”). In assessing the feasibility of MM-TR-1 through TR-41, an FFP is a necessary component of any analysis related to the economic feasibility of the identified mitigation measures.

B4-12

e. The PDEIR fails to include an analysis of consistency with the Pedestrian Master Plan (“PMP”). Given enhanced walkability is a formal objective of the proposed project, the PDEIR should include discussion of the proposed project’s consistency with the PMP.

B4-13

5. Greenhouse Gasses (“GHG”) & Air Quality

B4-14

a. The PDEIR incorrectly concludes that the proposed project is consistent with applicable state plans related to GHG emission reduction targets. Specifically, the adopted CARB 2017 scoping plan identifies the reduction of vehicle miles travelled (“VMT”) as an essential component of the Mobile Source Strategy required to achieve state mandated 2030 GHG emission targets pursuant to AB 32. The scoping plan makes clear “VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this Plan.” (California Air Resources Board (Nov. 2017) *California’s 2017 Climate Change Scoping Plan, Pg. 75*) To evaluate consistency with the Scoping Plan, the PDEIR must analyze and quantify reductions or increases in VMT, and must include a discussion of how the plan achieves actual, quantifiable per-capita reduction in city-wide VMT as a result of the proposed project. Further, the 2017 scoping plan makes clear that “employing VMT as the metric of transportation impact statewide will help to ensure GHG reductions planned under SB 375 will be achieved through on-the-ground development...” (*Scoping Plan, Pg. 76*). By solely relying on LOS as a threshold of significance in evaluating transportation impacts, the PDEIR is inconsistent with the 2017 scoping plan. These conflicts

<p>present a potentially significant impact requiring the evaluation of feasible mitigation. One potential mitigation measure may be the adoption of a reduced VMT project alternative.</p>	B4-14
<p>b. The PDEIR fails to analyze consistency with the VMT reduction targets established in the adopted 2017 CARB Scoping Plan and related Mobile Source Strategy. In developing the 2017 Scoping Plan, CARB determined “that VMT reductions of 7 percent below projected VMT levels in 2030...are necessary. In 2050, reductions of 15 percent below projected VMT levels are needed.” (<i>Scoping Plan</i>, Pg. 101). The PDEIR fails to include an analysis of how the proposed project achieves, or fails to achieve, these mandated reductions in VMT.</p>	B4-15
<p>c. The PDEIR concludes that the proposed project will “improve the active transportation mode share within the area”. (PDEIR, Page 4.4-19) but does not quantify the use of various transportation modes in the community planning area. Mode share data is needed to support this conclusion of consistency with the Regional Plan. Further, any analysis of consistency with strategy 3 of the CAP requires comprehensive quantitative mode share data to evaluate achievement of the 18% bicycle mode share target contained in Action 3.3 of the CAP.</p>	B4-16
<p>d. The proposed project is inconsistent with Action 3.6 of the CAP which seeks to reduce average commute distances and overall VMT. In claiming consistency with Action 3.6, the DPEIR states: “Enhancing the walkability and bicycling facilities through the implementing actions discussed above would promote these transit opportunities, thereby <i>reducing VMT</i>” (DPEIR, Page 4.4-21, emphasis added.) In the Air Quality section, however, the PDEIR concedes that “the future VMT associated with buildout of the proposed CPU would be <i>greater</i> than the... the adopted Community Plan, thereby resulting in greater mobile source emissions.” (DPEIR, Page 4.1-12, emphasis added). The DPEIR attempts to have it both ways: it simultaneously concludes the project both reduces and increases VMT. Incoherently, the GHG section concludes that despite the overall <i>increase</i> in project VMT, the proposed project will <i>reduce</i> vehicle GHG emissions by over 20%. How can the project claim to reduce GHG vehicle emissions when vehicle miles travelled, and the number of vehicles on the road, increase? The DPEIR appears to rely on the unsubstantiated conclusion that GHG emissions from cars will be reduced “due to increased regulations and cleaner technologies that reduce mobile-source emissions.” (DPEIR, Page 4.4-17). These technologies that will achieve GHG reduction must be identified in the PDEIR. Further, because VMT increases under the proposed project, and thus, is inconsistent with Action 3.6 of the CAP, the project results in a potentially significant impact and the City must identify feasible mitigation. Such mitigation could include subsidized transit passes, TDM features, bicycle enhancements or other transportation amenities. In addition, no analysis is provided regarding achievement of the target contained in Action 3.6 related to reductions in average commute distance. The PDEIR must include a quantitative analysis of the proposed project’s impact on the</p>	B4-17

numeric target contained in Action 3.6.	B4-17
e. It is unclear whether the proposed project will increase VMT above existing 2018 baseline levels. The PDEIR should include analysis of not only the increase in VMT above the approved community plan but also quantitatively disclose VMT increases above existing 2018 levels.	B4-18
f. The DPEIR concludes that despite the possibility of localized increases in GHG emissions, the “City of Villages” strategy found within the City’s general plan will reduce per-capita GHG emissions on a city-wide basis. The DPEIR, however, fails to quantify the reduction in per-capita GHG emissions on a city-wide basis as a result of the concentration of new residential units in transit areas. The DPEIR should include a quantitative analysis of per-capita emissions reductions achieved through implementation of the proposed project. As noted in comment 5(b), mode share data is necessary to complete this analysis.	B4-19
g. The Air Quality section of the PDEIR identifies one mitigation measure related to buildout of the current SDCCU stadium site. MM-AQ-2 purports to require certain mitigation measures to be included in the specific plan associated with the stadium project. However, the City is not the lead agency for the stadium project and will have no discretionary authority to require any particular mitigation measures be included in the specific plan. As such, the City cannot compel compliance with any of the features listed in MM-AQ-2 and the mitigation is infeasible.	B4-20
h. In order to ensure the minimization of health impacts to sensitive receptors, The Air Quality section of the PDEIR should include a mitigation measure requiring future development projects to prepare a health risk assessment (“HRA”) as mitigation for potential significant air quality impacts associated with heavy equipment and construction emissions.	B4-21
6. <u>Public Services & Facilities</u>	B4-22
a. Fire Station/ Police Station. <ul style="list-style-type: none"> <li data-bbox="422 1459 1445 1627">i. The Program DEIR does not show emergency response time calculations for first responders. The Program DEIR should include emergency response time analysis reflective of the proposed development density and traffic. <li data-bbox="422 1648 1445 1774">ii. The Program DEIR does not include an analysis of emergency response/ first responder staff to resident ratio. Demonstrate compliance with the City’s General Plan. 	
b. Schools	B4-23

- | | | |
|----------|--|-------|
| i. | The PDEIR does not adequately clarify projected student population and short-fall of classroom seats within the planning area. Clarify the projected student population and demonstrate compliance with San Diego Unified School District guidelines. | B4-23 |
| ii. | The PDEIR fails to analyze safe walkability to schools. Safe walkability to schools reinforces the Community Plan Update goals of increasing walkability, reducing VMT, and meeting the Climate Action Plan (CAP) goals. If students must be transported (bussed) to adjacent communities, the Community Plan Update has failed to achieve its primary objectives of providing for mixed-use, transit oriented, walkable neighborhoods for families to reside, work, play and educate. | B4-24 |
| iii. | The PDEIR should analyze additional land locations for new schools to meet the projected student population within the planning area. | B4-25 |
| iv. | The draft community plan identifies a potential school facility located at the SDCCU stadium site. The PDEIR should include analysis regarding SDSU's specific plan and whether, at this time, a school facility is proposed. | B4-26 |
| c. Parks | | |
| i. | The Draft PEIR indicates a 108 AC population-based parklands shortage at community build-out and identifies the shortage as a significant unmitigable impact. The Table ES-1 Summary of Significant Environmental Impacts reflects no significant impacts. The inconsistency between documents should be corrected. | B4-27 |
| ii. | The Draft PEIR identifies a shortage of population-based parklands in conflict with the City's General Plan. Additional population-based parklands should be identified to achieve conformance with the General Plan. Conflict with the park standards in the general plan may require the City to identify feasible mitigation. | B4-28 |
| iii. | Given the substantial deficit of population-based parkland in the planning area, the PDEIR should analyze the potential for public private partnerships as a means to add additional parklands and serve as feasible mitigation for the failure to meet general plan standards related to parks. | |

7. Noise

- | | | |
|----|---|-------|
| a. | The Draft PEIR references use of landscaping to minimize noise exposure to sensitive receptors. Landscaping does not attenuate noise in any appreciable amount. The Draft PEIR should delete reference to landscaping as a way of minimizing impacts related to noise exposure or quantify the reduction in | B4-29 |
|----|---|-------|

DBL/CNEL achieved through implementation of landscape as noise attenuation.

B4-29

8. Public Utilities & Infrastructure

B4-30

- a. The Draft PEIR fails to analyze alternative land development densities which may present mitigatable impacts to utilities and infrastructure.

9. Historic Resources

B4-31

- a. The PDIER should include, to the extent feasible, an inventory of existing historical sites within the planning area. Further, to provide certainty for future applicants, the PDEIR should attempt to inventory those sites that may require a future analysis of the historic character of the property during the planning horizon covered by the draft community plan.



NORTH PARK PLANNING COMMITTEE

<http://www.northparkplanning.org>

info@northparkplanning.org

March 9, 2019

To: Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123
Via email: PlanningCEQA@sandiego.gov

From: North Park Planning Committee (NPPC)

Re: **PROJECT NAME: Mission Valley Community Plan Update (CPU)**
PROJECT No.: 518009 / SCH No. 2017071066

The North Park Planning Committee (NPPC) hereby submits the following comments on the Mission Valley CPU Draft Program Environmental Impact Report (PEIR)

B5-1

In regards to MM-TR-22 (Texas Street between 1400’ north of Madison Avenue and El Cajon Boulevard), MM-TR-39 #61 (Texas Street/Camino Del Rio South in the AM peak hour), and MM-TR-39 #67 (Texas Street/Madison Avenue in the AM peak hour), the Draft PEIR states that none of the improvements identified in the mitigation measures were added to the proposed CPU because they would be inconsistent with the goals and policies of the Mobility Element of the proposed CPU, the General Plan, and the Climate Action Plan, and therefore the impacts are considered significant and unavoidable.

B5-2

1. NPPC supports adding the following improvements as mitigation measures on the east side of Texas St. from Camino Del Rio South to Madison Avenue in lieu of MM-TR-22 and MM-TR-39 #61 & #67:

B5-3

- (1) Physically protected bike lane
- (2) Sidewalk
- (3) Acorn style lighting to match the west side of Texas St.
- (4) Pedestrian guard rail towards the canyon

2. NPPC opposes widening Texas St. from Camino Del Rio South to El Cajon Boulevard. The segment Texas St. from El Cajon Blvd. to Madison Ave. has single family homes with driveways, and it includes the recently designated “Melhorn and Son” Historic District.

B5-4

3. The outdated methodology of Level of Service (LOS) should not be the only methodology used to determine transportation impacts and mitigation, and other methods should be used such as Vehicle Miles Traveled (VMT) that are consistent with the City General Plan and the Climate Action Plan. | B5-5
4. The following additional recommendations are made for Texas St.: | B5-6
 - (1) The synchronization of traffic lights north of Camino Del Rio South would improve traffic flow
 - (2) Adding protected bike lanes from Camino Del Rio South to Friars Road would improve bicycle utilization
 - (3) Adding a northbound right turn lane at Texas St. and Camino Del Rio South would improve traffic flow

The comments above are consistent with the motion made at the February 19, 2019 NPPC meeting. | B5-7

Sincerely,



René A. Vidales, Chair
North Park Planning Committee



March 23, 2019

TO: Rebecca Malone, Environmental Planner, City of San Diego Planning Department,

VIA EMAIL at: PlanningCEQA@sandiego.gov

SUBJECT: MISSION VALLEY COMMUNITY PLAN UPDATE, SAN DIEGO AUDUBON COMMENTS ON EIR SCH# 2017071066

This Plan will result in major and diverse impacts on the Mission Valley area. The San Diego River is the defining feature of that area. It is also a major East/West wildlife corridor for our region. Much of the River itself is part of the Multiple Habitats Planning Area (MHMP) for our region. The MHPA is land that has been identified as essential for the survival of a large number of at-risk, threatened, and endangered plant and animal species. Much of the River is also mitigation for previous projects. The City has committed to State and Federal agencies that it will protect this land and its wildlife support value for these and the other species that depend on the MHPA. The actions defined in this Update could have substantial negative impacts, individually and cumulatively, on that support value for the many species that depend on it. This document addresses many potential impacts of the Plan, but it specifically excludes analyzing impacts to biological resources. As such, it fails to identify measures that might eliminate, minimize, or mitigation for these impacts. We urge that this document be rescinded and rewritten to fully address these potential impacts to biological resources.

B6-1

To assess the impacts of the project, the EIR must provide information on what wildlife live in, disperse within, and move through the Valley. Without this information, it has no way to substantiate its assertion that the changes from this project will not have a substantial impact on that wildlife. We will discuss a few of the issues that should be fully addressed in the following paragraphs.

NOISE IMPACTS ON WILDLIFE

The songs and calls of wildlife are essential for sounding alarms, attracting mates, locating mates and offspring, protecting habitat, etc. Increased noise and changes in the spectrum of noise can have serious impacts on the ability of wildlife to hear and to benefit from these signals. This has been shown to reduce the amount and type of wildlife that will use a habitat area and their ability to survive and to reproduce there, if they choose to use it. The document totally fails to identify this potentially significant impact on biological resources, either for specific projects or cumulatively. It also fails to provide measures to reduce or avoid the impacts of noise on wildlife or to mitigate for them, in spite of the importance of the area for wildlife and its status as MHPA.

B6-2

WILDLIFE MOVEMENT

To assess the impacts of the project the EIR should provide information on what wildlife live in, disperse within, and move through the Valley. Without this information it has no way to substantiate its assertion that the changes from this project will not have a substantial impact on that wildlife.

B6-3

In our region, our few rivers are the main corridors for east/west wildlife movement for terrestrial animals and many bird species because of their continuity and because they provide much more shelter, forage material, and water than our arid uplands. Reducing the capability of wildlife to move safely will tend to increase the fragmentation among habitat areas along the River. This would be ironic as the original research that has led to the global understanding of the impacts of habitat fragmentation on wildlife was done in San Diego. Measures to maintain and improve wildlife movement in the valley and the MHPA should be identified in the EIR.

B6-3

We especially urge that the EIR address improving, or at least maintaining the wildlife connectivity between Murphy Canyon and the River. Currently wildlife can readily move across the dark and quiet stadium parking lot at night. This is the only tributary canyon with a viable wildlife connection with the River in Mission Valley. When the redevelopment mentioned in the Plan occurs, this connectivity could be lost. We urge the Plan to identify mitigation measures to improve, or at least maintain that connectivity.

CROSSINGS

The project includes additional roads crossing the River and the MHPA, such as J Street and Via los Cumbres. It does not address the potential cumulative impacts to the biological resources of the River or to the MHPA of these crossings, either as separate projects or cumulatively. This is a serious deficiency.

B6-4

These crossing will tend to make East/West movement of wildlife more difficult and riskier. More fatal bird strikes are likely occur to birds flying low over the additional crossings. More road kills are likely to occur to land animals that must cross the additional roads leading up to the bridges during times in which there is too much water in the River for them to move under the bridges.

The bridges and their approaches will shade habitats in the River and in the MHPA resulting in reduced productivity and wildlife support value of the riparian habitat.

The additional crossings will result in litter from pickup trucks and careless drivers in more portions of the River. This will result in reductions in the habitat value of the River in those additional areas.

The cumulative impacts of the additional bridges and their approaches will require mitigation, but the EIR does not show that such mitigation is feasible in the project area.

None of the cumulative and individual impacts on biological resources due to the additional crossings are analyzed in the EIR. Since the viability of the MHPA is at stake, it is likely that each of the impacts should be considered to be significant if they were actually analyzed in the EIR. If the impacts of these additional crossings were fully identified we feel they would be removed from the plan and better means to provide mobility would be identified.

BIRD STRIKES

Because of the River, Mission Valley has a large number and variety of bird life. The Plan will result in taller and more tall buildings in the valley. It will also result in more artificial lighting. Both are likely to result in more collisions between birds and structures. The EIR should include a cumulative analysis of this problem to allow informed future decisions on what design, lighting, and fenestration standards should be applied to projects in the project area to avoid the problem.

B6-5

PARKS

The Plan appears to provide far less park area than City standards require. Areas with dense housing need substantially more park resources than areas dominated by single family residences with their individual yard space. This is likely to result in habitat areas being overused by residents to offset the deficiencies in parks. Overuse of habitat areas has caused significant impacts on the wildlife support value of many of our natural park areas and degraded their value as biological resources. This EIR should identify the park deficiency and its likely impact on biological resources and identify mitigation to fully avoid this impact.

B6-6

FLOOD MAPS

The EIR shows flood maps under existing conditions. It does not show maps of flood conditions and dam break conditions with the additional crossings and development proposed under the Plan. We urge those additional maps be provided in the final document. We also urge that flow paths and velocities for flood condition and dam breaks be shown for the existing conditions and for the additional crossings and development. The analysis should also evaluate whether the hydrologic changes or additional needed bank stabilization would degrade the river's habitat areas and wildlife support value.

B6-7

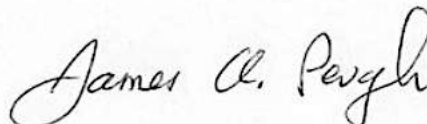
WATER QUALITY

We urge that the water quality discussion be expanded to assess whether the water quality impacts of the additional activity, litter, traffic, leaky dumpsters, dog droppings, etc. will have a negative impact on the fish and other wildlife of the River. This is essential to know whether the implementation of the Plan will reduce the wildlife support value of the MHPA.

B6-8

Please revise this EIR to fully assess the impacts of the Plan on the biological resources of the project area. In case of questions, I can be reached at peugh@cox.net or 619-224-4591.

Sincerely,



James A. Peugh
Conservation Chair
San Diego Audubon Society



Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

Wednesday, March 20, 2019

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

Re: Mission Valley Community Plan Update

Ms. Malone,

Save Our Heritage Organisation (SOHO) acknowledges that a draft Program Environmental Impact Report has been prepared for the Mission Valley Community Plan Update (CPU) as well as a Historic Context Statement and Constraints Analysis.

B7-1

Many historical resources have been identified within the context statement, however, SOHO wants to highlight the National Register eligible San Diego Stadium specifically (also listed on SOHO's 2018 Most Endangered List), and that under CEQA any project involving this resource will require the development of an EIR with various alternatives that retain all or a portion of this historical resource. Second, the CPU draft notes that several areas may be of high interest to Native American communities, which SOHO believes will be highly likely due to the ethnohistoric route through the valley, and encourages any projects that involve this area communicate early in the project timeline to the Native communities.

B7-2

B7-3

Last, the sensitivity map within the Constraints Analysis should be expanded to "high sensitivity" around the San Diego Mission de Alcalá to include the areas that were once the gardens and agricultural fields for the Mission.

B7-4

Thank you for the opportunity to comment,

Bruce Coons
Executive Director
Save Our Heritage Organisation



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March 23, 2019

VIA EMAIL

Rebecca Malone
Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, California 92123
PlanningCEQA@sandiego.gov

Re: Mission Valley Community Plan Update Draft Environmental Impact Report and Draft Plan

Dear Ms. Malone:

Thank you for the opportunity to review and submit comments on the City's Draft Mission Valley Community Plan Update ("Draft Update") and Draft Program Environmental Impact Report ("DPEIR"). Our client, Westfield LLC, has appreciated the opportunity to participate, together with other stakeholders, in the community outreach process for the Draft Update. Westfield looks forward to continued involvement in the Community Plan Update process, including submitting these comments on the Draft Update and the DPEIR. Our detailed comments are provided in **Attachment 1** to this letter.

B8-1

Westfield owns and operates Westfield Mission Valley, a large shopping center in the heart of the Mission Valley Community Plan.¹ Westfield acquired the shopping center in 1994, and since then continued to bring in high-quality tenants that serve neighborhood and regional shopping needs, which generate significant revenues for the City and play an important function in the Mission Valley Community.

In addition to the variety of shopping and dining options provided, Westfield Mission Valley provides much-valued entertainment and community-serving uses, including pop-ups and seasonal events. In the future, Westfield would like to incorporate additional entertainment and community-serving uses into the center to serve the increasing population of Mission Valley.

B8-2

¹ The Westfield sites include (1) "Mission Valley East," which includes the retail center site generally bounded by Camino del Rio North to the south, Mission Center Road to the west, Camino de la Reina to the north, and Qualcomm Way to the east; and (2) "Mission Valley West," which includes the retail site generally bounded by Camino del Rio North to the south and east, Camino de la Reina to the north, and Mission Center Road to the east.

We want to ensure that these types of entertainment and community uses are encouraged by the Community Plan Update.

B8-2

Westfield is also looking to the future in other ways. Westfield is interested in pursuing investment opportunities on the property that may include shopping, dining, entertainment, office, hotel, residential, and community-serving uses, much like Westfield has done at other centers. For example, Westfield Century City Mall is analogous to the Mission Valley Mall in that it was an existing mall in an urban center. Westfield expanded and remodeled the existing facility, updating its look and expanding the retail offering to complement adjacent office, hotel, and residential uses. The existing mall served as the base for development and allowed the mall to modernize while continuing to operate. Westfield Century City is an example of how allowing a broad mix of uses, while respecting the existing facility that will act as the “roots” of the development, can lead to an innovative and dynamic project that catalyzes adjacent development.

A similar development at Westfield Mission Valley would provide a host of new public benefits—especially given the site’s location largely within one-quarter mile of an existing transit stop. We see great potential in Mission Valley, and want to work closely with the City through the Community Plan Update process to help ensure that this potential can be realized on the Westfield sites.

To that end, Westfield has been working with the City since 2015 to share its vision for the long-term success of Westfield Mission Valley as a regional retail center within a larger urban hub. Over the next decade, Westfield anticipates continuing to invest in the existing retail center to further activate the center and provide supporting development in the lesser-developed areas surrounding the existing retail space. We look forward to working further with the City to implement and achieve that vision.

Accordingly, it is imperative that the Community Plan Update reflect that portions of Westfield’s property are developed with existing buildings. This shopping center has been serving the Mission Valley community for decades, is home to more than 100 businesses, and hosts over 14 million visitors per year. The Community Plan Update should provide flexibility for redevelopment or expansion of existing uses, and not require renovation or redevelopment of one portion of a site to impose physical requirements such as internal roads or rights-of-way that would be unduly burdensome or impossible for Westfield to meet given the existing development on site.

B8-3

Westfield also remains particularly interested in the ability of its customers and employees to access the site as the Mission Valley community grows and changes. Therefore, Westfield retained Michael Baker International (“MBI”) to review the DPEIR’s transportation analysis. Based on MBI’s analysis, we have identified several transportation assumptions and conclusions that would benefit from further explanation. These traffic-related comments are also summarized in Attachment 1.

B8-4

We remain excited about the opportunity to participate in the Community Plan Update process and to provide input on the vision of the future of Mission Valley. Given Westfield’s

LATHAM & WATKINS^{LLP}

major holdings in Mission Valley and its desire to continue to invest in Mission Valley, we appreciate the opportunity to submit these comments to ensure that under the Community Plan Update, Westfield will be able to continue to provide a first-class experience at Westfield Mission Valley now and in the future.

B8-4

Very truly yours,



Jennifer K. Roy
of LATHAM & WATKINS LLP

cc: Kim Brewer
Tom Fitzpatrick

**ATTACHMENT 1:
COMMENTS ON THE DRAFT MISSION VALLEY COMMUNITY PLAN UPDATE
AND PROGRAM DRAFT ENVIRONMENTAL IMPACT REPORT**

I. FLEXIBILITY FOR VISIONARY DEVELOPMENT

A. Land Use Designations

B8-5

1. Inconsistency Between Draft Update and DPEIR

Figure 4 of the Draft Update depicts the entire Mission Valley East site as Mixed Use (High Density). However, Figure 3.3-1 of the DPEIR depicts Regional Retail in the center and Mixed Use (High Density) on the east and west edges of the Mission Valley East property. We request that this inconsistency be corrected, and that the DPEIR designations be carried forward in the Draft Update.

2. Potential Zoning Designations

B8-6

We understand that, as part of the Community Plan Update process, the City will be removing the existing zoning designations provided under the Mission Valley Planned District Ordinance, and will be utilizing existing or new City-wide zones in their place. Therefore, we request that the City clarify the following sentence on page 4.8-16 of the DPEIR: “Portions of the CPU area may be zoned according to the Mission Valley PDO base zones or citywide base zoning districts.”

The Draft Update and the DPEIR also do not provide sufficient detail about the potential zones that would be applied within each of the land use designations depicted in Figure 4 of the Draft Update and Figure 3.3-1 of the DPEIR. We request further clarification of the intended zones that would be potentially applicable within each of the land use designations—and in particular, within the Regional Retail and Mixed Use (High Density) zones.

3. Flexibility of Uses

B8-7

As a general theme, we believe that flexibility is necessary to create unique and visionary designs that respond to future trends and opportunities. Accordingly, we request that additional flexibility for use types be included in the Community Plan Update.

For example, the description of the Regional Retail land use designation in the Draft Update does not appear to contemplate office (both medical and professional) and hotel uses. Our experience is that modern centers are activated by such uses. Modern retail centers often include restaurants and entertainment districts where hotels want to locate. This is apparent in many urbanized areas, where hotels are located where visitors can shop, go to dinner or a show, and stay the evening in the area. The same is true for office uses. Office uses connected to the Regional Retail areas allow for employee synergies where an employee can park their car at work and have access to restaurants, health club facilities, and retail services, all in one location.

Precluding this type of use in the Regional Retail area would encourage more vehicle trips to run errands or move between uses. We believe that Westfield Mission Valley could become a one-stop area for living, employment, shopping, dining, and entertainment, and believe that the Regional Retail designation should reflect that broadest diversity of commercial uses possible, including office, fitness, health and wellness, and entertainment uses.

B8-7

In addition to flexibility in use, we request a broader residential density range for the Mixed Use areas of the site. The Draft Update currently shows a residential density on the Westfield Mission Valley East property of 73 to 140 dwelling units per acre, and up to 87 dwelling units per acre on the Westfield Mission Valley West property. We believe that West property density is appropriate but believe that a broader range of 50 to 140 dwelling units per acre is more appropriate for the East property. Providing more flexibility in the Community Plan Update will enable Westfield to take advantage of unique opportunities to use both sites to achieve the City's goals.

B8-8

We are also concerned that the limits on residential density provided in the Community Plan Update may be inconsistent with the City's proposed amendment to the San Diego Municipal Code, Chapter 13, to add Division 7, "Mixed Use Base Zones." The Community Plan Update should be revised to eliminate inconsistencies with the City's existing and planned zoning designations, particularly with respect to density limitations.

B8-9

II. FLEXIBILITY FOR INCREMENTAL REDEVELOPMENT AND RETROFITTING

B8-10

Westfield is excited about the potential for redevelopment of Westfield Mission Valley and looks forward to working with the City on innovative design concepts as the retail center redevelops. This redevelopment will likely be an organic, iterative process that occurs in phases over a period of time. Because Westfield Mission Valley is an existing, operating retail center, there is a practical need to accommodate existing tenants, while being allowed to innovate on the small as well as large scale. Therefore, it is important that policy language be added to the Community Plan Update to allow such incremental development to occur organically, without conditions or obligations compelling future phasing or timeframes for development.

The Community Plan Update should be revised to recognize and protect Westfield's ability to redevelop portions of its property incrementally. Specifically, Westfield should not be required to complete a center-wide comprehensive plan if only a small area of the mall is proposed for renovation. Remodel proposals should be allowed to grow from the existing mall facilities and implement the design goals of the Community Plan Update, as feasible given site constraints and economic constraints.

Similarly, the Community Plan Update should be revised to reflect and incorporate the concept of Previously Conforming Premises and Uses, as set forth in Chapter 12, Article 7, Division 1 of the San Diego Municipal Code, and confirm that nothing in the Community Plan Update abrogates or affects those City-wide protections.

III. FLEXIBILITY FOR PASEOS

The Draft Update reflects a policy goal of breaking up large super-blocks with more direct pedestrian connections through the use of “paseos” or walkways. (Draft Update, pp. 36-39; DPEIR, pp. 4.13-54 to 4.13-55.) Westfield, in concept, supports providing north/south connections to the existing trolley station, but is concerned that the designated “paseos”—particularly the east/west paseos—depicted in the Draft Update will limit design flexibility and could conflict with existing buildings and the operational needs of the retail center.

Specifically, the Draft Update identifies paseos through the center of Westfield’s property. The contemplated paseos divide several existing buildings. We request clarification in the Community Plan Update that the City will not require demolition of an existing building for paseos, including as part of a redevelopment. It is likely that Westfield will renovate and reuse existing on-site structures, and the location of a “paseo” on the community plan map should not preclude the renovation of an existing structure in favor of a paseo. In addition, Westfield contemplates use of the existing retail structures as the base of a re-imagined mall. Retrofitting paseos into an existing retail mall is unworkable from both a practical and a financial perspective. Accordingly, we request that the City delete the paseo network on the Westfield property shown in the Draft Update so as not to restrict Westfield’s ability to create its own pedestrian experience in the mall, which will complement future development, and to respect existing businesses and opportunities for adaptive reuse. To the extent that the City desires to retain a north-south paseo, we request that its location be shown as “conceptual,” and that the Community Plan Update clarify that the ultimate location of the north-south paseo shall be left to Westfield’s discretion.

In addition, Policies BLK-1 through BLK-5 reflect a desire to transition to development in fine-grained block and lot patterns. (Draft Update, p. 158.) We are concerned that, as written, the policies have the potential to impede existing uses and limit future development. For example, Policy BLK-5 provides that a “pedestrian public access easement (paseo) should be provided through projects that are greater than four acres in size.” A requirement for a “public access easement” could preclude Westfield’s ability to operate the retail center in the safe and secure manner required by tenants and expected by customers. The retail center is private property, and it is important that Westfield maintain the ability to create rules and regulations for the property and utilize mall security to enforce those regulations. Accordingly, we ask that the requirement that paseos be public easements be removed from the Community Plan Update, removed with respect to Westfield’s sites, or clarified to provide that the paseos can be closed to the public outside of operating business hours.

IV. PARKS

A. Non-Traditional Park/Urban Amenity

Westfield Mission Valley is identified as a potential location for a “Non-Traditional Park Site,” with acreage to-be-determined. The park is described as a “Proposed Urban Park/Amenity to be developed in conjunction with a redevelopment of the Mission Valley Mall.” The Draft Update states that the City intends to “work with the property owner and developer to build an

B8-11

B8-12

B8-13

on-site urban park/amenity to support any new residential development. The park would be privately owned and privately maintained.” (Draft Update, p. 75.)

B8-13

Westfield is supportive of using its existing gathering spaces and urban open space within the mall area as an Urban Amenity. Westfield has created such spaces throughout Westfield UTC and Westfield Century City and would look to create similar signature spaces at Westfield Mission Valley. Therefore, we request further clarification in the Draft Update providing that the “Urban Amenity” include existing gathering spaces, urban open space, and common areas throughout the Mission Valley East site.

The Mission Valley East site is also identified as a “Potential Future Park” on Figure 15 of the Draft Update, along with a location in Civita and a location at Fenton Marketplace. (Draft Update, p. 77.) It is unclear why these three locations are called out on Figure 15, when other park sites—including the two proposed major park sites—are excluded. In line with the requested clarifications above, we request that the “Potential Future Park” designation on the Mission Valley East site be removed from the Community Plan Update.

B8-14

B. Population-Based Parks

B8-15

General Plan Policy RE-A.8 provides that a minimum of 2.8 acres of population-based parks should be provided per 1,000 residents. The Draft Update indicates that the City anticipates as many as 800 residential units on Mission Valley East and West properties. The population of those units (based upon current SANDAG estimates of persons per household for Mission Valley of 1.93 persons per household) would be 1,544 people. Per the General Plan standard, that would require 4.32 acres of park space. In many communities, projects are able to provide fees toward the development of parks in the community, and are not required to provide those parks on-site. We believe that Westfield should be given that option, especially given the City’s desire for an expansion of retail and residential square footage that will require significant new development on the existing mall site.

C. Park Inputs on Model Runs

We are also very concerned that the City may contemplate an even larger park on the mall property. The City Planning Department shared with Westfield the traffic modeling information provided to SANDAG for the Draft Update. The model run for MGRA 6187 and 6191 (which encompasses the East and West sites) shows an active park area of 480,421 square feet. This equates to an 11-acre park site. We request that the City clarify that the use of this input does not provide a requirement for Westfield to construct an 11-acre park.

B8-16

We believe that it is inappropriate to identify such a large park site on the Westfield property, because it would preclude the high-density, transit-oriented redevelopment contemplated elsewhere in the Draft Update. Adding a large park on Westfield’s property would also preclude retail and other development that is a major generator of revenues for the City. Further, Westfield Mission Valley already serves as a community gathering space for its 14 million annual visitors.

B8-17

In addition, because the City desires significant densification at the Westfield site in light of its proximity to transit, we believe that opportunities to provide park space, recreational centers, and aquatic centers in other locations, such as at the SDCCU stadium site, may be a better use of urban space. The City should investigate maximizing the use of undeveloped sites for parks and recreational opportunities, which would allow for the preservation of development area in the existing urbanized portions of Mission Valley.

B8-18

V. “NO NET LOSS OF JOBS” POLICY

Proposed Policy MXU-2 provides: “When mixed use development is proposed on a previously all commercial site, new projects should strive to facilitate no net loss of jobs on the site while increasing opportunities for housing. Units that integrate job opportunities such as live/work, shopkeeper, and home occupation are encouraged.”

B8-19

We are opposed to the inclusion of such a policy in the Community Plan Update. In addition to concerns about the policy’s implementability, we are concerned that opponents to development projects could abuse Policy MXU-2 to impede the redevelopment of sites in Mission Valley. Therefore, we ask that the City strike Policy MXU-2.

Policy MXU-2 is very ambiguous and would be extremely difficult to implement in practice. We provide the following potential scenarios as examples of the ambiguity in the policy:

- Many retail jobs and even retail tenants are seasonal, with additional employees being brought on during the holiday shopping season or in the summer months. This would make it almost impossible to determine what the “baseline” number of jobs are on a particular site and, in turn, determine what the “net loss of jobs” would be in a redevelopment scenario.
- If the City is considering applying models that determine the number of jobs based on a square footage factor, we are concerned that those models may not accurately reflect the ever-changing retail market. Retail stores are not all the same—two stores of the same size may employ vastly different numbers of employees based on the customer experience desired. Similarly, some clothing stores have become showrooms for on-line retailers where a small number of employees take measurements and do fittings and the garment is delivered to the person’s home. Would a “no net loss of jobs” count for this store include warehouse employees filling on-line orders from the store from a remote location?
- In addition, the nature of work is ever changing, including the rise in co-work or home offices. Would people working in home offices or co-work spaces be seen as “new jobs” that would offset the loss of retail jobs? If not, we are concerned that Policy MXU-2 could be interpreted as making a policy determination that one type of job is better than another.

- Policy MXU-2 could also lead to uncertainty when a retailer vacates a store. Does Policy MXU-2 mean that if a retailer vacates a store, and Westfield would like to replace the store with a condominium development consistent with the City’s policies for residential growth, the City would not allow the residential project to commence until a replacement for the lost retail jobs is found? Would the construction jobs produced by the residential project count towards the “no net job loss” policy?

B8-19

Many other potential scenarios would render Policy MXU-2 problematic, and we would be happy to discuss them with the City.

In sum, Policy MXU-2 is extremely ambiguous as written, and unworkable as a practical matter. While we appreciate that the City values protecting existing jobs, we are concerned that Policy MXU-2 does not take into account ever-changing land use and working trends and could be abused to stifle redevelopment in Mission Valley. Therefore, we do not think it is appropriate to include Policy MXU-2 in the Community Plan Update, and ask that it be stricken.

VI. FLEXIBILITY FOR RETAIL USES

B8-20

We appreciate the Draft Update’s goals of activating street frontages and encouraging ground-floor retail for new developments. However, certain policies appear to conflict with the existing retail experience at Westfield Mission Valley, and could complicate future improvements to the existing shopping center. Specifically, the following policies should be revised to provide additional flexibility for existing centers:

- Policy BPO-5 requires ground-level activation on all streets designated as “Potential Main Street” in the Urban Design section of the Draft Update. The section of Camino de la Reina adjacent to Westfield Mission Valley is designated as a “Potential Main Street.” Westfield Mission Valley East currently fronts Camino de la Reina, with separation by parking lots in some locations. In order to provide flexibility for existing developments and respect existing businesses, this policy should be revised to acknowledge that ground-level retail is not required when existing retail is already in place or when an existing inward-facing retail use expands or is renovated (as was the case with the successful expansions of Westfield UTC and Westfield Century City).

We also request that the designation of the section of Camino de la Reina adjacent to Westfield Mission Valley East as a “Potential Main Street” be removed, given the existing inward-facing retail development on the Westfield Mission Valley East site. At a minimum, the designation should be clarified such that it applies only to the north side of Camino de la Reina.

B8-21

- Policy COM-11 provides that new retail establishments should provide goods and services needed for local area residents and employees, unless placed on a site designated for Regional Retail services. We appreciate the Draft Update’s goals of encouraging neighborhood-serving uses that could reduce vehicle trips and

B8-22

vehicle miles traveled. However, this policy should not be interpreted to preclude the ability of a shopping center to take advantage of unique retail opportunities or respond to market trends. Therefore, we request that the policy be revised to clarify that neighborhood-serving retail uses are encouraged, but not required, in areas other than sites designated for Regional Retail uses.

B8-22

VII. SKYWAYS

B8-23

The Draft Update recommends considering skyways, also referred to as aerial trams, to provide connections between Mission Valley and adjacent neighborhoods. Two potential alignments are depicted, including a connection between the Mission Valley Center Trolley Station to the North Park community via Texas Street. The depiction of the skyway from the Mission Valley Center Trolley Station appears to cut across the eastern portion of the Westfield Mission Valley property.

We appreciate the clarification in the Draft Update that skyway alignments “are for illustrative purposes and will require further study before implementation.” (Draft Update, p. 55.) Given that this alignment is being studied by SANDAG, we request that the City work with SANDAG to identify an alternative alignment that more closely comports with existing roads to reduce impacts and uncertainty for private property owners.

B8-24

Regarding financial feasibility, we understand that the recent feasibility study for the potential downtown skyway estimated that capital costs would range from \$230 million to \$300 million, and annualized O&M costs would range from \$11 million to \$12 million.² We recommend that the City, at its cost, conduct a similar feasibility study for any skyways in Mission Valley to determine their financial viability. We also request that the Community Plan Update provide additional detail about how the skyways would be funded.

B8-25

VIII. IMPACT FEES

B8-26

We understand that the City is in the process of preparing the Mission Valley Impact Fee Study as a companion to the Community Plan Update. The Impact Fee Study will be critical to understanding how to best balance the need for infrastructure without creating a fee that disincentivizes the development needed to generate the fees.

The current Mission Valley Facilities Financing Plan includes a number of infrastructure projects that are to be funded by specific projects at the time of development. It is important that the long-time obligations for these particular projects be maintained and not burden future development at other locations. Westfield is committed to paying its fair share contribution to regional infrastructure; however, existing project-specific obligations in the Mission Valley Facilities Financing Plan should be maintained, including obligations for costly new bridges.

² WSP, Downtown to Airport Skyway Feasibility Study (September 2018), available at https://mediaassets.10news.com/document/2018/10/12/Downtown-AirportSkywayFeasibilityStudy-September%202018_100319181_ver1.0.pdf.

In addition, fee credit programs should also be included in the Mission Valley Facilities Financing Plan to allow infrastructure to be completed more quickly and be phased with development.

B8-26

IX. PARKING

We appreciate the Draft Update’s recognition that less parking (including smaller parking ratios in areas near transit stops) may be required in the future as alternative transportation options become more common. However, certain proposed parking requirements would be unworkable for a large commercial use, such as Westfield Mission Valley.

B8-27

Specifically, Policy COM-6 would require that nearly all parking serving commercial development should be sited behind any buildings facing the primary street, and would prohibit parking fields in front of buildings. The existing site plan at Westfield Mission Valley includes parking lots surrounding all sides of the shopping center. Policy COM-6 should be revised to clarify that it applies only to new developments on vacant sites, or projects that demolish all or most of an existing development, and does not apply to modifications or expansions of existing uses.

B8-28

Similarly, Policy PRK-6 provides that parking areas should be distributed throughout a project site to avoid large contiguous parking areas and to integrate landscaping. Like Policy COM-6, Policy PRK-6 should be revised to clarify that it applies only to new developments on vacant sites, or projects that demolish all or most of an existing development, and does not apply to modifications or expansions of existing uses. The policy should also be clarified to confirm that it would not apply to structured parking.

B8-29

Lastly, the Draft Update reflects a desire to consider below-grade parking for higher-density uses, such as uses in the Mixed-Use High Density designation. Given the relatively high water table and proximity to the San Diego River, much of Mission Valley is not amenable to underground parking. (See DPEIR, p. 4.3-4 [acknowledging “relatively shallow groundwater table . . . susceptible to liquefaction”].) Therefore, sufficient flexibility should be built into parking requirements to reflect the reality that surface or above-grade structured parking may be required.

B8-30

Finally, we support the City’s use of reduced parking ratios in areas near transit stops, which we believe more accurately reflects the benefits of transportation network companies (e.g., Uber and Lyft) and transit.

B8-31

X. BICYCLE INFRASTRUCTURE

We appreciate the Draft Update’s desire to establish a well-connected bicycle network throughout Mission Valley, and are supportive of policies to encourage bicycling and provide bicycle parking. However, from a safety standpoint, we are concerned about the Draft Update’s proposal to improve the existing Class II bike lane along Camino de la Reina to a Class III bike route. We recommend the City maintain the Class II facility and, where necessary, provide Sharrows where the existing right-of-way will not accommodate the Class II facility.

B8-32

Camino de la Reina at the entrance to Mission Valley Center is a busy road with motorists turning into the retail center. We are concerned that a Class III bike route in this location could result in a safety hazard for both motorists and cyclists. Specifically, Caltrans notes that Class III bike routes are generally not appropriate for roadways with higher motor traffic speeds or volumes.³ Therefore, we ask that the City reconsider the proposal to create a Class III bike route along this portion of Camino de la Reina.

B8-32

XI. COMMUNITY CIRCULATORS

B8-33

The Draft Update contemplates the use of community circulators, which would consist of electric vehicles that are smaller than a typical bus, and would offer high-frequency service within a short, closed loop route. A community circulator is proposed for the perimeter of the Westfield Mission Valley site. We encourage the City to consider replacing the community circulator with microtransit improvements (e.g., to include services such as Uber and Lyft). Public/private partnerships with transportation network companies like these have proven successful in providing short trip transit and rideshare services in urban environments. Accordingly, we request further exploration of microtransit as an alternative to community circulator service.

XII. AFFORDABLE HOUSING

B8-34

We appreciate the City's desire to ensure that new housing in Mission Valley reflects the demands and needs of all residents, including providing housing at affordable levels. However, the need to provide affordable housing is a City-wide issue, and different standards should not be imposed for Mission Valley that are not required in other parts of the City. Accordingly, we request that Policy RES-4 be removed to ensure that there is no perceived conflict between the Community Plan Update and the City's Inclusionary Housing Ordinance.

XIII. RESIDENTIAL DEVELOPMENT UNIT SIZE

B8-35

Policy RES-2 provides that new residential development should help to achieve a diverse mix of unit sizes and types to accommodate many lifestyles and family sizes. This policy should be revised to clarify that the policy should be interpreted to mean that the Mission Valley community as a whole should have a range of unit sizes and types, to avoid implying that each individual development must provide such a range.

XIV. FLAT ROOFS

B8-36

Policy BFD-7 would impose certain requirements for flat roof elements on all new structures and enlargements. Policy BFD-7 should be revised to reflect that the requirements only apply to enlargements of existing structures if no structural improvements or retrofits would be required to support the amenities.

³ Caltrans, A Guide to Bikeway Classification (July 2017), available at http://www.dot.ca.gov/d4/bikeplan/docs/caltrans-d4-bike-plan_bikeway-classification-brochure_072517.pdf.

XV. HISTORICAL RESOURCES

B8-37

Policy HSB-1 encourages the preservation and adaptive reuse of historical resources in Mission Valley. As the City is aware, Westfield is in the process of developing plans for the adaptive reuse of the May Company building within the Westfield Mission Valley site, and we appreciate the Historical Resources Board’s guidance in developing that proposal. While Westfield is excited about the adaptive reuse of the May Company building, the designation of historical buildings can provide significant challenges to redevelopment. Further, the preservation of historical buildings is a City-wide issue, and different standards should not be imposed for Mission Valley that are not required in other parts of the City. Therefore, to ensure City-wide consistency, the policy should be revised to clarify that development on sites containing historical resources shall comply with the City’s Historical Resources Regulations.

XVI. STREET TREES

B8-38

Table 9 of the Draft Update contemplates California Sycamore trees planted along Camino de la Reina and Camino del Rio North. We request that there be additional flexibility in the selection of street trees based on existing uses and specific locations.

XVII. BASELINE AND FUTURE GROWTH TRAFFIC MODELING – WESTFIELD SITE

B8-39

Westfield appreciates the City Planning Department sharing the traffic model runs for the Westfield Mission Valley East and West properties (MGRA 6187 and 6191, respectively). Our review of the traffic modeling revealed several concerns, addressed below.

A. Existing Conditions – Westfield Sites

We have reviewed the existing conditions assumptions used in the City’s modeling. However, the floor area numbers used in the model do not accurately reflect existing conditions. We request that City update its modeling to provide an accurate baseline for future development, or explain why revisions to the existing conditions inputs were required for model calibration.

B. Future Conditions – Westfield Sites

B8-40

While we appreciate that the City used best efforts to develop a hypothetical estimate of future conditions, the hypothetical future conditions used in the City’s modeling does not reflect what Westfield views as the future potential of Westfield Mission Valley.

For example, the model’s hypothetical scenario contemplates a reduction in the amount of regional and community retail, and a reduction in the number of employee trips. Westfield believes that there is significant growth potential for retail at Westfield Mission Valley. In addition, the model contemplates a reduction in the amount of Regional Shopping Center use, while the amount of Community Shopping Center use stays the same. We believe that there is potential for both types of retail uses to increase, and we are especially concerned that the Regional Shopping Center floor area has been reduced. In addition, as discussed above

regarding mixed-use flexibility, Westfield believes that office use is a potential use type on both properties. This use type should be included in the modeling, and in the land use designation for the properties. Finally, as discussed in Section IV, above, the placement of a large park on the East site serves to restrict development. Accordingly, the park should be reduced in scope or removed.

B8-40

We also request clarification from the City that the assumed hypothetical future conditions do not impose any restrictions or envelopes on the type or extent of development on the site, to the extent that other uses or densities are permitted by applicable zoning.

B8-41

C. Unexplained Changes in Traffic Volume

B8-42

We understand that the Four-Lane Via Las Cumbres Alternative daily traffic volumes were developed based on SANDAG's Series 13 Year 2050 Regional Model and calibrated for the Mission Valley community. As such, MBI compared the existing daily traffic volumes against to the Four-Lane Via Las Cumbres Alternative in the DPEIR to determine if the future daily volumes and projected growth seem reasonable. MBI's analysis showed that the future traffic volumes were lower than existing traffic volumes in several locations. While the reduction in traffic can be explained in specific areas of Mission Valley (specifically near the new Via Las Cumbres Bridge connection and the Fenton Parkway bridge connection), some reductions in volumes do not seem to be reasonable results. For example:

- Friars Road between SR-163 and Mission Center Road: The daily traffic volume is approximately 9,000 vehicles per day less with the proposed Community Plan Update (Year 2050 condition) compared to the existing daily traffic volume. There appears to be no reason for this reduction in traffic.
- Camino De La Reina between Camino De La Siesta and Mission Center Road: The existing daily volume is 10,730 vehicles per day and the proposed Community Plan (2050 condition) daily volume is forecast to be 10,800 vehicles per day. This represents a growth of 70 vehicles for the next 30 years, which seems unrealistic. However, traffic growth is forecast on Camino Del Rio North between Camino De La Siesta and Mission Center Road by approximately 7,500 vehicles per day. We would expect growth on both Camino De La Reina and Camino Del Rio North based on recent development in this area.

B8-43

We request that the City review the model results for these segments and assess whether corrections to the model are required.

D. Significant and Unavoidable Impacts

B8-44

The DPEIR concluded that numerous roadway segments and intersections will experience significant impacts at build-out of the Community Plan Update, including segments that have the potential to constrain access to and from the Westfield sites. These segments include Camino De La Reina between Avenida Del Rio and Camino De La Siesta, and Mission Center Road near I-805/Phyllis Place. Although the DPEIR lists potential mitigation

improvements to reduce these impacts, the improvements are not included in the Community Plan Update “because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU mobility vision and other proposed CPU and General Plan goals and policies regarding walkability and bicycling, which are consistent with the City of Villages strategy, and were therefore determined not to be appropriate for the roadway network.” (DPEIR, pp. 4.13-38 to 4.13-39.) However, the DPEIR later implies that implementation of such measures may be reviewed as part of “future review of Specific Plan proposals and coordination.” (*Id.*, p. 4.13-39.) These statements appear to reflect inconsistent positions—if the measures are not feasible for policy reasons, it is unclear why the City will require reassessment for project-level development. Therefore, we request clarification of the City’s intended review of the identified improvements in the context of project-specific development.

B8-44

E. Vehicle Miles Traveled

The DPEIR’s Mobility Technical Report estimates that Community VMT per Service Population is estimated to be 24.8 for the base year 2012 and 17.2 for the proposed plan in year 2050. This translates to a reduction in VMT of 30.7 percent. However, the DPEIR does not explain whether this reduction is considered to be reasonable for Mission Valley. For comparison purposes, we request that the City provide the City’s VMT and average trip lengths so that the public may assess the VMT estimates in context.

B8-45



TRUST, SERVICE AND INNOVATION SINCE 1906

March 22, 2019

City of San Diego Planning Department
1222 First Avenue, 4th Floor
San Diego, CA 92101

9485 Aero Drive, MS 413
San Diego, CA 92123

**Subject: MISSION VALLEY DRAFT COMMUNITY PLAN UPDATE
Working Draft (February 6, 2019) and DRAFT PROGRAM ENVIRONMENTAL
IMPACT REPORT Project No. 518009; SCH No. 2017071066**

Dear Mr. Schoenfish, Ms. Graham, and Ms. Malone:

B9-1

H.G. Fenton Company (Fenton) has had an opportunity to review the Revised Draft *Mission Valley Community Plan Update* (CPU) (Working Draft dated February 6, 2019). We appreciate the effort that staff has made in not only responding to many of the comments and requests presented in our January 4, 2019 letter but also for other changes that we believe help to make the CPU a more effective document for laying out a framework that provides policy guidance as Mission Valley develops and redevelops as a 21st century community.

As we reviewed the revised draft of the CPU, we note that there are still some areas where the Plan is lacking and where identification of specific community features is incorrect and should be removed from the CPU. Therefore, this letter restates our previous issues and concerns and identifies where we believe revisions/additions to the CPU are necessary.

We also appreciate the opportunity to review the DRAFT Program Environmental Impact Report for the Mission Valley Community Plan Update. Provided below are also comments and questions relative to our review of the PEIR.

SPECIFIC COMMENTS

1. **Planned Roadway Network – Specifically Street J.** Fenton, like staff, continues to support an additional all-weather north-south connection through the western portion of Mission Valley as part of the Community Plan’s roadway network. Staff has been responsive to options for providing a smaller, less intrusive facility than what Via Las Cumbres would be; and we are supportive of roadway designed in a manner that does not detract from the visual and biological elements of Mission Valley and the San Diego River. Thus, we support Street “J” as providing an efficient addition to the community’s circulation network.

B9-2

Our support, however, is contingent on identifying a funding source for this new roadway that will ensure its construction in the relatively near-term. While Street “J” may be seen as a regional roadway

B9-3

improvement, it directly serves the Riverwalk project and will provide value to future redevelopment of that property. Therefore, we request that the City appropriately identify Street “J” as developer funded and assign the responsibility to developers of the Riverwalk project. B9-3

Future Zoning. We continue to be concerned that zoning for the community has not been provided for review in concert with CPU land uses. Separating the review of land use from zoning does not allow for complete review of the draft CPU. However, most essential is that the CPU needs to clearly state that existing uses that legally operate under current zoning be allowed to continue and to expand or change in accordance with existing approvals and existing zones. We do not see that such language has been added to the CPU. Please add something similar to the following to ensure that existing uses can be retained and redevelop over time, as market conditions allow. B9-4

It is anticipated that the transition to mixed use, transit oriented development will take place through incremental implementation as individual properties are redeveloped. While the shift of land uses occurs over time, Light Industrial land uses that predominate in many areas of the community may locate or relocate to any tenant space on any premises within Mission Valley that retains previously conforming status for such uses through adopted Specific Plans, regardless of the square footage of the tenant space; however, a change in use to a separately regulated use is not permitted. Previously conforming status remains with a premises until such time as all tenant spaces on a premises have been vacant for a period of two years, at such time previously conforming status ceases.

2. **Public Parks.** The CPU should be revised to remove reference to a public park at Mission Valley Heights. There is no space for an Urban Park. Although, public spaces will be an important part of redevelopment in Mission Valley Heights, any public space should be determined at the time redevelopment is brought forward in a manner that makes sense with the overall site plan and redevelopment proposal. B9-5

3. **Area-Specific Design: Hillside/Steep Slope.** This discussion of hillsides and steep slopes is dated and appears to be derived from a time when mining operations had not yet fully reconfigured Mission Valley to the point that natural hillsides and steep slopes only occur – for the most part – in the southern part of the community. There is a lot of focus on “Hillside/Steep Slope” development, and yet there is really limited opportunity in the Valley for any further encroachment into steep slopes and hillsides. Slopes that frame the northern extent of the community have been manufactured as a result of sand and gravel mining operations. Existing development patterns and completion of mining in Mission Valley has pretty much set the development footprint for the Valley. Guidelines for future encroachment and development in hillside/steep slope areas of the community should be made current and then be modified to apply to future redevelopment opportunities. B9-6

For example, future redevelopment of Mission Valley Heights may require manipulation of **manufactured** slopes. The CPU should not include any special requirements that would preclude the redevelopment and re-visioning of Mission Valley Heights. The CPU should include guidelines that reflect the difference in manufactured hillsides and steep slopes from those that remain as a natural and important landform for Mission Valley. A focus on redevelopment in areas where manufactured slopes occur should be on how those slopes can be landscaped and treated in a manner that improves the appearance of the hillsides. Whereas, for natural slopes that rim the southern portions of Mission Valley, guidelines should focus on preservation of these hillsides and requirements to revegetate and restore disturbed portions of the southern slopes.

4. **General Transportation.** Pages 4.13-36 – 4.13-38 – It is unclear why all of the mitigation measures are infeasible. Roadway widenings occur with – and are required for – projects all the time. Just because a mitigation measure would not meet the goals of a plan does not mean they are infeasible. What would it take for some/all of these measures to be implemented?

B9-7

Some key segments to note, but aren't limited to include:

1. I-15/Friars Road Interchange Area including MM-TR-3 and MM-TR-33
2. I-8/Mission Center Road Interchange Area including MM-TR-36, MM-TR-38, and MM-TR-34
3. I-8/Qualcomm Interchange Area including MM-TR-21 and MM-TR-37
4. Camino de la Reina, between Avenida del Rio and Camino de la Siesta including MM-TR-7
5. Friars Road, between Avenida de las Tiendas and Ulric/SB-163 SB ramps including MM-TR-2

As projects are approved in Mission Valley, it is important this the Community Plan Update guides the necessary infrastructure improvements that are critical for Mission Valley to serve as a local and regional hub of live, work, and play. Appropriate infrastructure improvements for cars is still critical to the success of Mission Valley in the future.

B9-8

Infrastructure financing districts, development impact fees, and the leveraging of outside financial resources are critical to the construction of these infrastructure projects and can supplement the financing needed from private developers who can take the lead in implementing these projects.

Specific Transportation. Below are specific comments regarding transportation:

1. At the intersection of River Run Drive at Rio San Diego Drive (Intersection 34) traffic control is to be modified from the current all-way stop to a single-lane roundabout. This intersection is the primary access to the Club River Run Apartments. Although the roundabout is showing to operate at an acceptable level of service, additional analysis will be needed to assess the feasibility of construction including any ROW impacts to the adjacent properties. Why was a roundabout selected at this location?
2. In Table 3 of the CPU (Planned Roadway Classification Modifications), one modification of note is Metropolitan Drive and Mission Valley Road where the roadway classification would change from a 2-lane collector **with** two-way left turn lanes to a 2-lane collector without TWLTL to accommodate bike lanes while retaining the on-street parking. The primary issue is that the center left turn lane is important to the flow of traffic in and out of the businesses here, and if the Mission Valley Heights area adds residential development over time, the designated turn lane will become even more important. We recommend not modifying the road classification here as the forecast daily volume is 10,100 vehicles with a daily capacity of 10,000 vehicles resulting in an unacceptable LOS F service according to Table 5.2 in the PEIR TIA.
3. Two roadway segments have notable changes in traffic volume that need more explanation:

B9-9

B9-10

B9-11

- a. Friars Road between SR-163 and Mission Center Road, where the daily traffic volume is appx 9,000 vehicles less with the proposed CPU in the 2050 Condition compared to the existing traffic volume. There appears to be no reason for this drop in traffic. B9-11
- b. Camino de la Reina between Camino de la Siesta and Mission Center Road, the existing volume is 10,730 vehicles per day and the proposed CPI (2050 condition) daily volume is forecast to be 10,800 vehicles per day. This represents a growth of 70 vehicles for the next 30 years which seems unrealistic. For reference, traffic volume is forecast on Camino del Rio North between Camino de la Siesta and Mission Center Road by 7,500 vehicles per day. B9-12

GENERAL COMMENTS

The CPU is cumbersome and difficult to use as a tool not only for developers and builders that are essential participants in the future of Mission Valley, but also for residents who live, work, play – and love the community. We offer the following general comments for staff's consideration in hopes of creating a final easily understood and user-friendly Community Plan. B9-13

1. **Lack of Land Use Table with Build-out Development Intensities. Specific Plan Areas.** B9-14

Please include a land use table, as included in the Draft Program Environmental Impact Report as Table 3.4-1, that shows build-out development intensities and residential densities for all land uses shown in the CPU.

2. **Community Plan implementation Overly Zones (CPIOZ).** It is unclear how projects that have steep slopes and/or other environmental sensitive lands (ESL), such as parcels that have lots extending into the San Diego River or parcels that are identified as having Special Flood Hazard areas, would be able to be approved ministerially under CPIOZ A. Is the ESL Ordinance being amended in concert with the CPU to exempt the Mission Valley Community? B9-16

Thank you for the opportunity to offer our comments relative to the Mission Valley CPU. We hope that you give our comments honest consideration as you continue to refine the CPU as a functional planning document for our community.

Sincerely,



John LaRaia, Vice President
H.G. Fenton Company

Cc: Mike Hansen, Planning Director
Councilman Scott Sherman

From: Cherie Ross
To: [PLN PlanningCEQA](#)
Subject: Mission Valley Community Plan Update Programmatic EIR Comments
Date: Tuesday, February 19, 2019 6:30:55 AM

As a friend of the San Diego river, I oppose the extension of Via Las Cumbres over the River (or a similar bridge). Without clear definitive reasons for the bridge which will have a significant impact to the river and quality of the planned River Park and paths, it is important to instead improve Fashion Valley Road and other roadways as well as bike and walking pathways and the trolley. Thank you for your attention, Cherie Ross

C1-1

March 17, 2019

City of San Diego Planning Department, et al
9485 Aero Dr., M.S. 413
San Diego, CA 92123

Re: Mission Valley Community Plan Update (draft doc. 2) dated 2/6/19

Dear Mayor Kevin L. Faulconer, Councilmember Scott Sherman, Rep. Scott Peters, and Nancy Graham/Melissa Garcia/Planning Department, Current Director SD Riverwalk LLC, and Hines/Houston

I am in receipt of the Mission Valley Community Plan Update (MVCPU) posted on Building Department website dated 2/6/19. I would like to make comments pertaining to said document and others, and request City tax investment and changes as follows:

C2-1

1. **Via Las Cumbres extension:** According to MV Planning Group minutes 2-6-19 regarding Nancy Graham update as to the preferred City VLC extension, I am confused as to why anyone coming from Linda Vista Road heading south on VLC would want to continue over Friars and into the Riverwalk Development. Will there be a cut-through to Fashion Valley Road or at least a left turn to the Trolley stop?

C2-2

According to the *Mission Valley News*, it appears that Avenue J (proposed) 2-Lane road will traverse Riverwalk Dev and serve *First Responders* instead of the original 4-Lane VLC extension to I-8.

Why would *First Responders* want to take a two-laner (proposed Avenue J) to get anywhere quickly? Will *First Responders* possibly encounter bike riders or pedestrians when they are rushing to an accident scene? The saner thought would be to widen Fashion Valley Road to get them onto I-8 pronto. Avenue J could still be used to improve internal Riverwalk Dev. mobility.

Residents of Riverwalk Dev., The Courtyards at Mission Valley, and Mission Greens do **not** want to listen to the trolley DINGING and the SIRENS WAILING all night. A Noise Control Consultant for Trolley and First Responder noise abatement should be hired by Hines.

C2-3

Here is a humble suggestion if the City insists on traversing Riverwalk Dev. with a First Responders' Road: Do not extend Via Las Cumbres past Friars Road. Instead, make an immediate widening of the east-moving right-hand lane of Friars, creating an extended turn lane into Avenue J (proposed) and beyond to Fashion Valley Rd. This would eliminate the cost for VLC extension through Riverwalk Dev. City funds could be applied instead to the turn lane into signalized Ave. J (proposed), etc. The adding of the eastbound turn lane would relieve traffic congestion at quitting time and provide a big cost-savings to the City. Move the bike lanes over and extend platform sidewalks southward into Riverwalk air space. It would also facilitate First Responder vehicle pass-through. FR vehicles could swoop around the turn lane and access Ave. J (proposed) at the signal.

C2-4

2. Suppositions of the Traffic Report – I found the traffic-increase report to be hilarious. How is it that you can triple the population in Mission Valley and substantially decrease the trip-mile percentages per day? This is a fantasy extrapolation of the statistics. There are few if any large corporations operating out of Mission Valley to make it a true work/play environment. However, there are plenty of vehicles driving to retail properties in the area. I think Planners should cool the POPULATION DENSITY INCREASE until the City has a **viable taxing authority** which will collect a tax on every new apartment rental, retail lease and commercial building lease. This tax will provide funding to avoid swamping our MV roads, electrical grid and water pumping stations.

C2-5

C2-6

This tax must be fully dedicated to Mission Valley to ensure that all traffic lights are timed, paseos are built, sidewalks are flattened and widened, beautiful lighting is installed, overhead gondola is built, potholes are fixed timely, a bridging structure is built on Fashion Valley Road to go over the continually flooded portion of the road which is near Town and Country, the proposed Riverwalk public park is fully funded and beautified with overhead bird watches, overhead picnic platforms, bike trails, and non-floodable raised structures with ramps, and our MV beach park is improved.

This tax should be in range of .25% of the lease value and .1% of any sale. Developers could collect this money at their cost and forward to the City each quarter. This is not an arduous suggestion and would show good faith from developers and ensure residents of Mission Valley a prosperous and beautiful place to live and work.

Specifically, how will the City effectuate a (proposed) dedicated westbound bus turn lane at the corner of Friars and Fashion Valley Road? There are only two lanes at that intersection with the gas station (think pollutants) on the left and a drop-down to Fashion Valley property on the right. Also there is an entrance straight across into an apartment complex besides east and westbound traffic turns onto Friars. Are there plans to widen Fashion Valley Road at this signal? Are there adequate easements?

C2-7

3. I ride the Trolley twice per month to go to Seaport Village and Little Italy to go Salsa dancing. In order to make this a viable alternative means of transportation around the City, the trolley must run every 15 minutes in the evening. There are a fair amount of mentally ill and/or homeless people congregating at Trolley stops. Although I have never personally had a problem, my question is whether the City will address rider's needs by placing Security Guards/Tourist Assistants at each station? This would increase ridership and could be funded from a portion of City Hotel taxes.

C2-8

*The Morena Trolley stop is quite creepy at night. A nice paseo starting from Friars and widening into the station with benches and **good lighting** would increase ridership and retail sales at the stop and encourage an open setting with fewer lurkers*

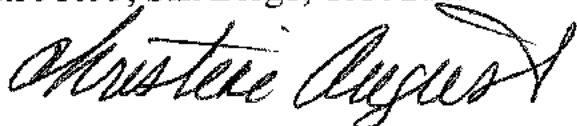
C2-9

4. I was pleased to see that the Planning Department is encouraging a light color palate for Mission Valley buildings. Light building colors and lovely Flame and Jacaranda trees – what could be prettier? *We are not interested in looking like Chicago, Trenton or Houston with their dark and dreary brick buildings. Let there be light in Mission Valley!*

C2-10

Thank you so much for your hard work at the Planning Department!

Sincerely, Christine August - Courtyards at Mission Valley Resident
PO Box 91099, San Diego, CA 92169 – 561-866-7552



Copies: Courtyards at Mission Valley Association, Mission Greens Condo Assoc. William Zounes/Dev. Svcs, CPG

From: Dennis McGibben
To: [PLN PlanningCEQA](#)
Subject: Mission Valley Community Plan Update - Project #518009
Date: Saturday, March 23, 2019 1:33:39 PM

Comment Letter C3

March 23, 2019

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

re: Mission Valley CPU Draft PEIR Comments ,SCH # 2017071066

I would like to start by saying I support both the MVCPCG and the Linda Vista Riverwalk Ad Hoc Sub-committee's comments on the Draft PEIR.

C3-1

My own personal concerns are centered around emergency services. I am a retired firefighter from a large Northern California city, in the heart of Silicon Valley. It seems San Diego has missed a golden opportunity to have these large developments build Fire Stations for the city when and where the need arises. This has been done for years in San Jose where I worked for 30 years. I understand then the city has to staff these stations , but that is always the case with growth. The tax base generated by these large developments should offset some of these costs.

C3-2

Thank you , I know you have a difficult job trying keep this city as the greatest city to live in here in the United States. I know we don't want to be another LA.

DENNIS MCGIBBEN
PARK PLACE ESTATES

Sent from my iPad

RE: Comments on PIER 2nd Draft Mission Valley Community Plan

To: All Parties Concerned

Rebecca Malone

Environmental Planner

PlanningCEQA@SanDiego.gov , MPrinz@SanDiego.gov

#1) My email address is PacificSanDiegoEric@gmail.com
Please respond to my comments this time ??

C4-1

#2) Health impact on Current Residents residing in Mission Valley already, and being subjected to all the construction, dust, toxins, noise, stress and added heavy equipment construction traffic is not being address at all in this report. Please start evaluating this and proposing solutions, e.g., such as only one project will be allowed at one time until it is completely finished ?

C4-2

#3) The report should be completely restarted as three separate reports to make any sense of any of the data collected, analyzed or proposed for construction. There should be a “WEST” Mission Valley PIER -COASTAL, and “CENTRAL” Mission Valley PIER Heavy Business, and an “EAST” Mission Valley PIER, a new university basically, all individually constructed and evaluated. This is because each region has distinctly different demographics, residential quantities and retail/business levels and densities, as well as three distinctly different futures! Just the shape of the Mission Valley geography cutting an east-west cross section right through our city would indicated that is the only way to proceed.

C4-3

#4) Confirmation that there will never be a public recreation center presented again to the area of Mission Valley west of Freeway 163. There are already plenty of Fitness centers and public coastal parks. Though, the area is 25,000 residents under-serviced for a grocery store.

C4-4

#5) DENSITY ISSUES AND DENSITY EXPLORATION ISSUES ARE BEING COMPLETELY IGNORED IN THE REPORTS.

C4-5

#6) There are complete shortfalls in the provisions of infrastructure support and funding sources confirmed for any of this growth ?

C4-6

- #7) Why is RiverWalkSD being ignored, and put under quotation marks “Planned” ? It is the highest density of people proposed per square foot and is NOT approved ?? The impact in combination with other projects need explicit analysis and immediate attention ? | C4-7

- #8) There is not provision for NOISE attenuation ? Trees and shrubs are not NOISE attenuation solutions. REDUCTION in density is! ?? | C4-8

- #9) There is no FINAL IMPACT ANALYSIS on the combined impact of all the proposed construction ? | C4-9

- #10) Density of People per acre, residential units per acre is NOT consistent in any manner in the PLANNING and geographical distribution ? | C4-10

- #11) The density levels of current neighborhoods, “Spirit of the Neighborhood” (CEQA) is not being respected or presented in this plan at all ?? |

- #12) The Impact on the San Diego River is not being evaluated ? | C4-11

- #13) The limitations of FEMA support, or complete lack of FEMA support, due to out flood plain land region ? | C4-12

- #14) Is it 108 Acres short on easily accessible public park area ? | C4-13

- #15) The combined LOSS of Trees, natural light and green view is not being addressed at all, and we are a tourist resort destination CITY ? Where is the natural aesthetics for all of us to enjoy ? | C4-1
4

- #16) Everything that is rushed through on this scale and all the projects in Mission Valley be rushed through results in unforeseen problems because of lack of detail ? Is that not true ? It will create more problems than it solves if not slowed down to collect actual details of singular projects after their individual completion before even considering another project to start ? | C4-15

- #17) Seattle and all successful happy cities had one Cardinal Rule, did they not, before growth, the Transit Systems were FIRST ALL INSTALLED and up and running well before any building was consideredIT IS DONE IN A | C4-16

LINEAR FASHION ?? OVERBUILD THE TRANSIT SUPPORT AND
INFRASTRUCTURE FIRST ! A beautiful city like San Diego deserves it !

C4-16

#18) The Mission Valley Planning group, committee, asked for an extension to reply, which would have allowed everyone the time they needed to reply in a more substantial and detailed fashion. However, Nancy Graham, present at that meeting said even the formal request for an extension would be denied.

C4-1
7

Thank you for considering these issues, I look forward to hearing back from you.

Sincerely,

Eric Albert, PacificSanDiegoEric@gmail.com

From: Felicity Senoski
To: [PLN_PlanningCEQA](#)
Cc: [Noli Zosa](#)
Subject: Mission Valley CPU PEIR Comment Letter
Date: Saturday, March 23, 2019 2:49:36 PM
Attachments: [MVCPU.PEIR.Comment.ltr.approved.pdf](#)
[ATT00001.htm](#)

Hi Rebecca,

I am submitting the attached comment letter on behalf of the Linda Vista Planning Group's Riverwalk Ad Hoc Subcommittee. Please note that I am adopting the comments in this letter as an individual and would add to it the inadequacy of the PEIR on the issues of public safety and storm water. As to public safety, the PEIR fails to provide an adequate emergency response time analysis that takes into consideration the massive increase in density proposed at the west end of Mission Valley, specifically, the Riverwalk development area. Additionally, the cumulative impacts of the adjacent Morena Corridor Specific Plan area on SDPD's Western Division, the proposed collocation for fire and police, are not adequately considered. With respect to storm water, the PEIR fails to adequately analyze the impact of the updates that would be required of the existing infrastructure to make it compatible with new infrastructure that would be required to mitigate the impacts of storm water run off.

C5-1

C5-2

C5-3

Please acknowledge and confirm receipt of this email prior to the expiration of the comment period.

Sincerely,
Felicity Senoski
Linda Vista Planning Group Member
Riverwalk Ad Hoc Subcommittee Chair

happydogz247@yahoo.com

From: Jim Grant
To: [PLN PlanningCEQA](#)
Cc: [Marge Grant](#); [Mary Shepperd](#)
Subject: Mission Valley Community Plan Update - Project #518009
Date: Saturday, March 23, 2019 11:58:13 AM

Comments on the MVCPU Draft PIER

Rebecca Malone
Environmental Planner
City of San Diego Planning Department

Dear Ms. Malone,

Thank you for the opportunity to comment on the MVCPU Draft PIER. My wife and I are property owners on Cirrus St. which is very near the intersection of Friars Road and Via Las Cumbres and we have been part of the San Diego community for over 70 years!

C6-1

First and foremost, we vehemently support the comments of Felicity Senoski for the LVPG. We need to add how disappointed we are that an important study like this does little to offer options to mitigate significant and damaging impacts on our precious environment. We are deeply saddened at the the developmental impact on the San Diego River which floods and closes beaches now with very little rain. The PIER draft simply accepts this worsening situation.

C6-1

Finally, residents will not give up their cars and assumptions to the contrary can not be substantiated in fact. Also, the final environmental impact from the continuing development on east Friars Road will not be known for years, yet future development ignores this and risks compounding irreversible environmental damage.

C6-1

Respectfully,
Jim and Martha Grant

From: June C Krantz
To: [PLN_PlanningCEQA](#)
Subject: Mission Valley Community Plan Update - Project #518009
Date: Friday, March 22, 2019 9:27:17 PM

Comment Letter C7

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

Re: Mission Valley CPU Draft PEIR Comments, SCH #
2017071066

C7-1

Our concerns deal with the size of the development that Riverwalk promises. Schools are already lacking in this area. We wonder how fire, police coverage, and so many things that a real neighborhood requires will be addressed. **We do not want** to have Mission Valley develop into a "downtown" atmosphere with 5+ story buildings and high density comparable to the center of the city.

June and William Krantz
5896 Friars Rd. #5310
San Diego, CA 92110

June and William Krantz

From: Irving Tannenhaus
To: [PLN.PlanningCEQA](#)
Subject: MVPG DRAFT #2 EIR and Mobility Study
Date: Saturday, March 16, 2019 9:51:35 AM

Comment Letter C8

March 16, 2019

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

Re: MVPG Draft #2 EIR and Mobility Study

Dear Ms. Malone,

We live and own in The Courtyards condominiums development in Mission Valley which is comprised 340 Condominiums and have lived here for 26 years . We are right next to the Riverwalk Golf Course. We would like to object to the new Riverwalk development proposal on many grounds. The most significant are:

C8-1

<!-- [if !supportLists]-->1) <!-- [endif]-->Noise and increased traffic. Friars Rd is now completely overwhelmed with cars during rush hours and this huge project will make it unlivable, as well as making it extremely difficult to get emergency medical services to many residents living along

C8-2

Friars Rd (there are many older residents in these condos). The proposed Via Las Cumbres extension from Friars Road to Hotel Circle South as a FOUR lane major bridge arterial roadway will bring non-stop noise and pollution to this area. We invite you to come live in this area if you think it will remain livable with such a huge influx of units.

C8-2

<!-- [if !supportLists]-->2) <!-- [endif]-->Raising the ground for this development will mean that all the other condos – Courtyards, Presidio Place, Mission Greens, etc will now be subject to both flooding and to undermining the strength of the foundations due to liquefaction of the soils.

C8-3

<!-- [if !supportLists]-->3) <!-- [endif]-->There is inadequate parking for the current residents in this area of Friars Rd. Losing more spaces for this project will worsen the problem. From what we have seen, the proposed project will have inadequate provision for those residents. Adding a trolley stop is just ignoring reality if anyone thinks that will have a significant impact on parking in this area.

<!-- [if !supportLists]-->4) <!-- [endif]-->We believe there is inadequate emphasis on obtaining sufficient fresh water for this proposal. Let's start focusing on our real resource crisis for our existing homeowners and current residents and start prudent reports and plans for these

immediate needs first.

<!-- [if !supportLists]-->5) <!-- [endif]-->We believe more time is needed for the affected residents to input their views and concerns for this major, major change in the quality of life here. Informally talking with fellow residents in my complex shows that almost no one knows any details of this proposal. Please extend the time for resident input and increase your efforts to inform the Friars Rd residents before proceeding further.

C8-3

Thank you for your consideration and attention to this very important matter.

Marilyn Lewis

Irving Tannenhaus

March 23, 2019

Comment Letter C9

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

Re: Mission Valley CPU Draft PEIR Comments, SCH # 2017071066

I would like to start by indicating that I fully support and echo the Comments you have received on the Draft PEIR from the Mission Valley Community Planning Group and the Linda Vista Riverwalk Ad Hoc Sub-committee.

C9-1

My own additional personal comments are as follows:

Overall:

Once again, like the Draft #1 MVCPU, this Draft PEIR was completed in a rush to get it published, and it is inadequate and incomplete. There was no attempt to complete the appropriate analysis, and as a result, all impacts are rated either less than significant, or significant and unavoidable. In many critical areas, mitigation is showed as “not feasible.” By avoiding dealing with these issues in the current EIR, the City is inviting inevitable litigation and project delays for the foreseeable future.

C9-2

In many cases the EIR defers to project level analysis that will not be evaluated for their cumulative impact on the San Diego River and Air Quality and Greenhouse Gas Emissions and traffic. Large projects such as Riverwalk and SDSU are not estimated or quantified in ways that are appropriate given their expected large impact on the CPU. These impacts should be estimated and quantified in all sections of Environmental Analysis.

The proposed alternative of Street J crossing the San Diego River has profound negative impacts to the river that cannot be mitigated, and appropriate alternatives have not been brought forward or analyzed. Improvements to Fashion Valley Blvd and addition of police and fire stations on the south side of the west end of Mission Valley have not been proposed or evaluated. Street J will result in wetland deviation that requires mitigation, and once this MVCPU is approved, the analysis/mitigation requirement will be reduced. The devastating impact of Street J and any other cross-river construction on the San Diego River is not addressed, studied and mitigated in the Draft PEIR.

C9-3

All road alignments proposed in the MVCPU need to be analyzed for environmental impact.

C9-4

The intent for the MVCPU to increase ministerial projects will reduce the need for EIR studies of projects down the road and will push individual projects to deal with resulting community opposition and litigation.

C9-5

Traffic:

The vehicle studies associated with this EIR continue to rely on Level of Service metrics instead of Vehicle Miles Traveled (VMT) that will be required by the state starting July 1, 2020. For most of the life of this document, VMT will be the relevant metric, but this document does not provide any VMT metrics that projects can comply to. The traffic studies should be revised to comply with future requirements of VMT measures.

C9-6

The PEIR assumes that building along trolley lines will result in fewer vehicles and more transit ridership without any corresponding studies that would support such a conclusion. The plan for much more and higher housing density in Mission Valley, an area that is already suffering from transit congestion, especially during rainy period when many roads close, is not addressed, with no studies provided that address impact or mitigation.

C9-7

Police and Fire:

One new police facility with 76 new officers is inadequate for anticipated population growth. The plan for a new fire department shared with Linda Vista is not described or analyzed in sufficient detail to determine if it will be adequate for anticipated population growth. Emergency Response Times are already deficient, and this is not addressed in the MVCPU.

C9-8

Schools:

Indicates there will be a new school facility at the SDSU site, but there SDSU indicates that their plan will not include any new schools. At the current time, there are no public schools in Mission Valley. The plan includes an elementary school for Civita, but no other school facilities. All middle and high school students have to be bussed to existing campuses in Serra Mesa, Linda Vista, Kearney Mesa, etc. This is not consistent with the stated desire for a neighborhood that encourages walkability. Bussing creates emissions that are not analyzed, evaluated or mitigated. Safe routes to schools are not addressed. The current MVCPU and associated Draft EIR do not adequately address schools for the level of population growth proposed.

C9-9

Signed,
Mary Shepperd
6003 Cirrus Street
San Diego, CA 92110
(408) 930-3435

March 23, 2019

Comment Letter C10

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

Re: Mission Valley CPU Draft PEIR Comments, SCH # 2017071066

I would like to start by indicating that I fully support and echo the Comments you have received on the Draft PEIR from the Mission Valley Community Planning Group and the Linda Vista Riverwalk Ad Hoc Sub-committee.

C10-1

My own additional personal comments are as follows:

Overall:

C10-2

Once again, like the Draft #1 MVCPU, this Draft PEIR was completed in a rush to get it published, and it is inadequate and incomplete. There was no attempt to complete the appropriate analysis, and as a result, all impacts are rated either less than significant, or significant and unavoidable. In many critical areas, mitigation is showed as “not feasible.” By avoiding dealing with these issues in the current EIR, the City is inviting inevitable litigation and project delays for the foreseeable future.

In many cases the EIR defers to project level analysis that will not be evaluated for their cumulative impact on the San Diego River and Air Quality and Greenhouse Gas Emissions and traffic. Large projects such as Riverwalk and SDSU are not estimated or quantified in ways that are appropriate given their expected large impact on the CPU. These impacts should be estimated and quantified in all sections of Environmental Analysis.

C10-3

The proposed alternative of Street J crossing the San Diego River has profound negative impacts to the river that cannot be mitigated, and appropriate alternatives have not been brought forward or analyzed. Improvements to Fashion Valley Blvd and addition of police and fire stations on the south side of the west end of Mission Valley have not been proposed or evaluated. Street J will result in wetland deviation that requires mitigation, and once this MVCPU is approved, the analysis/mitigation requirement will be reduced. The devastating impact of Street J and any other cross-river construction on the San Diego River is not addressed, studied and mitigated in the Draft PEIR.

C10-4

All road alignments proposed in the MVCPU need to be analyzed for environmental impact.

C10-5

The intent for the MVCPU to increase ministerial projects will reduce the need for EIR studies of projects down the road and will push individual projects to deal with resulting community opposition and litigation.

C10-6

Traffic:

C10-7

The vehicle studies associated with this EIR continue to rely on Level of Service metrics instead of Vehicle Miles Traveled (VMT) that will be required by the state starting July 1, 2020. For most of the life of this document, VMT will be the relevant metric, but this document does not provide any VMT metrics that projects can comply to. The traffic studies should be revised to comply with future requirements of VMT measures.

The PEIR assumes that building along trolley lines will result in fewer vehicles and more transit ridership without any corresponding studies that would support such a conclusion. The plan for much more and higher housing density in Mission Valley, an area that is already suffering from transit congestion, especially during rainy period when many roads close, is not addressed, with no studies provided that address impact or mitigation.

C10-8

Police and Fire:

C10-9

One new police facility with 76 new officers is inadequate for anticipated population growth. The plan for a new fire department shared with Linda Vista is not described or analyzed in sufficient detail to determine if it will be adequate for anticipated population growth. Emergency Response Times are already deficient, and this is not addressed in the MVCPU.

Schools:

C10-10

Indicates there will be a new school facility at the SDSU site, but there SDSU indicates that their plan will not include any new schools. At the current time, there are no public schools in Mission Valley. The plan includes an elementary school for Civita, but no other school facilities. All middle and high school students have to be bussed to existing campuses in Serra Mesa, Linda Vista, Kearney Mesa, etc. This is not consistent with the stated desire for a neighborhood that encourages walkability. Bussing creates emissions that are not analyzed, evaluated or mitigated. Safe routes to schools are not addressed. The current MVCPU and associated Draft EIR do not adequately address schools for the level of population growth proposed.

2.2 Lead Agency Responses

This section includes responses to each comment, in the same order as presented in Table 2-1. The responses are marked with the same number-letter designator as the comment to which they respond.

Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft PEIR or to other aspects pertinent to the potential effects of the proposed CPU on the environment pursuant to CEQA. Comments that address policy issues, opinions or other topics beyond the purview of the Draft PEIR or CEQA are noted as such for the public record. Where comments are on the merits of the proposed CPU rather than on the Draft PEIR, these are also noted in the responses. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final EIR. These revisions are included in Chapter 3 of this Final PEIR: Revisions to the Draft PEIR. Where sections of the Draft PEIR are excerpted in this document, the sections are shown indented. Changes to the Draft PEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

A. AGENCIES

A1 State Clearinghouse

A1-1 Comment noted.

A2 Caltrans

A2-1 Comment noted.

A2-2 Comment noted. One of the major goals of the proposed CPU is to implement the City of Villages strategy through integration of transportation and land use to provide a compact, walkable community that allows for reductions in VMT. The City has incorporated a number of policies related to intelligent transportation systems and TDM in the Draft CPU. Additionally, the City supports and requires implementation of TDM programs for specific projects through implementation of a CAP Consistency Checklist. Furthermore, the PEIR mitigation framework (specifically, MM-TR-63) requires coordination with Caltrans to develop TDM strategies as a means to reduce significant impacts. Likewise, the proposed CPU's policies, implementing actions, and design guidelines support General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, and improved connections to transit. Therefore, as suggested, the CPU encourages strategies to further reduce VMT and GHG emissions. These policies would also support increased safety for all users through support for enhanced pedestrian and accessible amenities within the plan area.

A2-3 Comment noted. See response to comment A2-2. With respect to early coordination with Caltrans, the PEIR states, "... the proposed CPU includes Implementing Actions that provide for continued coordination with regional partners such as SANDAG, Caltrans, and MTS to address regional transportation. The City would continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development

proceeds, to potentially develop ‘fair share’ mitigation strategies for freeway impacts, as appropriate...” (Final PEIR page 4.13-39).

A2-4 Comment noted. The City recognizes the need to process future Encroachments Permits for the construction of facilities that would cross Caltrans right-of-way (see Final PEIR Section 3.6) and will coordinate with Caltrans early in the planning process for any facilities within the right-of-way.

A2-5 The comment does not address the adequacy or completeness of the PEIR. Future projects would be required to provide electric vehicle (EV) charging infrastructure consistent with the California Green Building Standards Code, in addition to the City’s Climate Action Plan Consistency Checklist, as applicable. Siting of EV charging stations would be determined as future specific projects are proposed.

A2-6 through A2-9

As stated on Page 4.13-39 of the PEIR, the proposed CPU includes Implementing Actions that provide for continued coordination with regional partners such as SANDAG, Caltrans, and MTS to address regional transportation.

Additionally, as provided in MM-TR-63 and MM-TR-64, the City would continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development proceeds, to potentially develop “fair share” mitigation strategies for freeway impacts, as appropriate. However, due to uncertainty regarding specific improvements, the significant impact identified in the Mission Valley CPU PEIR will remain significant and unavoidable.

The City plans to include projects in the Mission Valley Infrastructure Fee Study to develop Project Study Reports to determine needed improvements at these locations.

A2-10 Comment noted. The CPU includes policies related to intelligent transportation systems that would support implementation of strategies identified in this comment.

A2-11 Comment noted. At a program level of environmental analysis, the impacts remain significant and unavoidable.

A3 SANDAG

A3-1 Comment noted.

A3-2 Comment noted. As discussed in PEIR Section 4.8.2.3, the proposed CPU’s land use scenario would be consistent with the goals of SANDAG’s Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles.

A3-3 The City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development proceeds, to potentially develop fair share mitigation strategies for freeway impacts, as appropriate. PEIR Section 4.13.2.3 discusses the proposed

mitigation framework for impacts to freeways and on-ramps. As stated therein, while the improvements identified in SANDAG's Regional Plan (2015) would improve operations along the freeway segments and ramps, there is insufficient information regarding future developments' project-level impacts to allow the City to include fair share mitigation within the proposed CPU. Improvements to the I-15 on-ramp require further study in conjunction with the development of the Stadium site under a Specific Plan that would identify direct and cumulative impacts and appropriate mitigation. PEIR MM-TR-63 and MM-TR-64 provide for this future review of Specific Plan proposals and coordination with Caltrans, SANDAG, and MTS (see PEIR pgs. 4.13-39 and 4.13-47-48). See also response to comment A2-2 and A2-3.

- A3-4 The comment does not address the adequacy or completeness of the PEIR. Future projects would be required to provide EV charging infrastructure consistent with the California Green Building Standards Code, in addition to the City's Climate Action Plan Consistency Checklist, as applicable. Siting of EV charging stations would be determined as future specific projects are proposed.
- A3-5 The comment does not address the adequacy or completeness of the PEIR. Comment noted. See response to comment A3-4.
- A3-6 The comment does not address the adequacy or completeness of the PEIR. Comment noted.
- A3-7 The comment does not address the adequacy or completeness of the PEIR. Comment noted. The City has incorporated policies related to intelligent transportation systems and TDM in the Draft CPU. Additionally, the City supports and requires implementation of TDM programs for specific projects through implementation of a CAP Consistency Checklist for specific projects. The PEIR mitigation framework (specifically, MM-TR-62) related to impacts to ramp meters requires coordination with Caltrans to develop TDM strategies to reduce significant impacts. A comprehensive parking management plan is not included in the CPU; however, policies have been incorporated that support parking reductions, repurposing parking for alternative uses, and encouraging unbundled parking.
- A3-8 Comment noted.
- A3-9 Comment noted
- A3-10 Comment noted.
- A4 SDSU**
- A4-1 Comment noted.
- A4-2 The comment does not address the adequacy or completeness of the PEIR. Comment noted.

A4-3 The comment does not address the adequacy or completeness of the PEIR. The PEIR clearly states that the future development of the Stadium site would require a Specific Plan.

A4-4 The assumptions used in the PEIR for the Stadium site were as follows:

- 4,800 dwelling units
- 2 million square feet of office use
- 300,000 square feet of retail use
- 450 hotel rooms
- 38.1 acres of active park
- 4.9 acres of open space
- 40,000 seat stadium

The footnotes mentioned in the comment have been revised to reflect all the assumptions made for the site.

A4-5 PEIR Section 3.6 has been updated to identify that a Specific Plan for the Stadium site prepared by SDSU would be a discretionary action subject to approval by the Board of Trustees of the California State University.

A4-6 PEIR Figure 4.13-5 illustrates a proposed purple line as identified in SANDAG's Regional Plan (2015). It is correct to state that while the purple line would run through the Stadium site, the exact alignment is not presently known. The PEIR analysis of future noise impacts considers that because the alignment is unknown, impacts are significant and unavoidable. Consistent with the PEIR mitigation framework, future discretionary review of the Stadium project would provide supplemental CEQA analysis to disclose the specific alignment of the trolley line, analyze impacts, and identify appropriate mitigation measures.

A4-7 The PEIR does not propose any specific development projects and its analysis is based on future buildout as foreseen by the Mission Valley CPU and other regional plans. Additional planning is needed to identify the location of future LRT stations within Mission Valley that will serve the planned Purple Line and the planned Red Line. The Mobility Technical Report Table 5.6 reflected the traffic model assumptions for future trolley lines in Mission Valley per the Regional Plan. Further planning in terms of detailed alignments and station locations is needed by SANDAG, MTS, and the Stadium Site Specific Plan to maximize transit accessibility and benefits of these regional investments.

A4-8 As stated in the comment, the project proposes the extension of "...Fenton Parkway south from the existing southern terminus to Camino Del Rio North as a 4-Lane Collector with turn lanes as needed, including grade separation and bridge over the San Diego River" (Mission Valley CPU Draft PEIR page 4.13-32). As such, this roadway segment was analyzed as a 4-Lane Collector with Two-Way Left-turn Lane in the Mission Valley CPU Mobility Technical Report (see Mission Valley CPU Mobility Technical Report Table 5.8).

The roadway is proposed because Fenton Parkway provides a crucial north-south connection for the Mission Valley community during a flood or other emergency, as well as providing for event traffic ingress and egress (see Appendix D of the Mission Valley CPU Mobility Technical Report). Therefore, a 4-Lane Collector with Two-Way Left-turn lane was proposed. Two-Way Left-turn Lanes can be accommodated by providing turn pockets where needed, in place of the Two-Way Left-turn Lane.

Consistent with the comment, a median is not proposed for this segment of Fenton Parkway and this error has been corrected in Table 3 of the proposed CPU.

- A4-9 LPIs listed on pages 4.13-61 and 4.13-62 of the Mission Valley CPU Draft PEIR were incorporated into the intersection operational analysis. Analysis results are included as appendices (I, K, L, and N) of the Mission Valley CPU Transportation Impact Analysis and Appendix K of the Mission Valley CPU Mobility Technical Report.
- A4-10 10a. The commenter is correct that the Mission Valley CPU includes the completion of sidewalks between Stadium Way and Mission Village Drive. Stadium Way is also referred to as “Qualcomm Way” on Google Earth.



10b. The Mission Valley CPU includes sidewalks on both sides of Friars Road. Site-specific constraints that may limit the ability to construct sidewalks on both sides of this street would be evaluated at the project level. At that time, all options for providing enhanced and convenient pedestrian and bicycle access and connectivity to and from the future Stadium Specific Plan site would be studied.

10c. The Mission Valley CPU includes sidewalks on both sides of San Diego Mission Road. Site-specific constraints that may limit ability to construct sidewalks on both sides of this street would be evaluated at the project level. At that time, all options for providing enhanced and convenient pedestrian and bicycle access and connectivity to and from the future Stadium Specific Plan site would be studied.

A4-11 The updated Infrastructure Fee Study (formerly known as Public Facilities Financing Plan) is anticipated to be considered by the City Council closely following adoption of the proposed CPU.

A4-12 Table 3 of the Mission Valley CPU has been revised to reflect the correct Existing Roadway functional classification. This revision does not affect the analysis results and does not change the findings of the PEIR.

The Transportation Impact Analysis, PEIR, and Mobility Technical Report correctly refer to these segments as a 6-lane Prime Arterial and 7-lane Expressway, respectively. No revisions are required to those documents.

A4-13 Signalized intersection timing sheets were obtained from the City of San Diego Traffic Engineering and Operation (TEO) Division and from Caltrans. Splits for all actuated-uncoordinated intersections were optimized for all scenarios.

Intersection splits at the Rancho Mission Road and Friars Road intersection were adjusted to match field delays.

Due to an update in signal timing for the following two intersections, new synchro output worksheets have been provided for:

- I-15 Northbound Ramps and Friars Road
- Texas Street and Camino Del Rio South

The updated synchro output worksheets are included with the revised Transportation Impact Analysis. The intersection delay and LOS were not affected as a result of this revision. Therefore, no additional revisions to the EIR are required.

A4-14 In response to this comment, PEIR mitigation measure MM-AQ-2, will be revised as follows: "...Equipment shall meet USEPA Tier 4 emission standards, as feasibly available..." (underlining represents revised language).

A4-15 The inclusion of the recreation center and aquatics complex in the analysis of parks and recreation provides the PEIR a full picture of proposed park/recreational land within the CPU area. While the specific location may not be specified in the PEIR, the inclusion of the acreage allows a broad analysis resulting in a finding that impacts associated with the need for new parks and recreational facilities would be less than significant. It is noted that, as identified in the comment, SDSU has reserved space within its proposed development for the inclusion of a 25,000-square-foot recreation center, the development of which would be further analyzed during review of the Stadium specific plan.

A4-16 The Water Supply Assessment (WSA) prepared for the CPU is found in Appendix L of the PEIR. As shown in Table 3-1 of the WSA, the projected water demand was based on SANDAG Series 13 forecasts through 2040 for dwelling units and employees in the community planning area. Water demand associated with the SDSU Mission Valley project was not included in the WSA. SDSU will prepare its own WSA for the project.

A5 USFWS and CDFW

- A5-1 Comment noted.
- A5-2 Comment noted.
- A5-3 Comment noted.
- A5-4 Comment noted. All future projects would be reviewed for consistency with the City's Biology Guidelines and the City's Subarea Plan.
- A5-5 The PEIR does not include project-specific analysis of consistency with the Subarea Plan as project level details are not known at this time; however, any future development would be required to be evaluated for consistency with the Subarea Plan. Detailed requirements associated with the Riverwalk project are outside the scope of this PEIR.
- A5-6 The comment does not address the adequacy or completeness of the PEIR. Comment noted.
- A5-7 As future plans for river crossings are developed, the City will avoid and/or minimize impacts to sensitive biological resources, including wetlands. As detailed in the Biological Resources section of the PEIR (Impact 4.2-3: Wetlands, page 4.2-29), all wetland habitats within the CPU area are located within the San Diego River CPIOZ, which requires additional discretionary review and supplemental development regulations. If wetland impacts would occur, they would be regulated by applicable agencies and in accordance with the City's Biology Guidelines, Environmentally Sensitive Lands Regulations, and the MSCP Subarea Plan which would ensure impacts would be reduced to a less than significant level.
- A5-8 Comment noted.
- A5-9 Comment noted.
- A5-10 PEIR Section 4.2.1 describes the environmental setting of the project area as it relates to biological resources. Consistent with the Notice of Preparation, the proposed CPU includes policies aimed at protecting and preserving existing open space areas, including, for example:
- IA-53 Interpretation. Preserve and protect City of San Diego-owned open space, canyons, and hillsides within the community by providing interpretive signs to explain the biologic and scenic value of the open space systems.
 - IA-59 Landforms. Protect the natural terrain and drainage systems of Mission Valley's open space lands and resource-based parks to preserve the natural habitat and cultural resources.
 - IA-60 Revegetation. Protect and enhance the natural resources of open space lands by revegetating with native drought tolerant plants and utilizing open wood fences,

where needed, adjacent to sensitive areas to provide additional protection while still allowing views into the area.

- IA-61 Storm water. Encourage all storm water and urban runoff drainage into resource-based parks or open space lands be filtered or treated before entering the area. Creative on-site biofiltration solutions can be considered within parks if limited to less than one quarter of the total park area and the filtration solution contains recreational amenities during dry seasons.
- A5-11 Any alignments provided are not intended to depict final alignments as future site-specific analysis and design would be required. Constraints such as existing mitigation sites would be considered as final alignments are developed. The proposed road extensions and facilities are detailed in the PEIR project description (refer to Section 3.3.3), and are appropriately analyzed programmatically.
- A5-12 PEIR Table 4.2.3 identifies wildlife species known to occur within the CPU area and identifies their potential to occur. Based on the nature of the environmental analysis, the table appropriately identifies the likelihood of occurrence based on data from the California Natural Diversity Database and the resources present within the CPU area. Only those species that were observed during the field reconnaissance completed for this project are noted in the table as “Observed in CPU area.” The text in PEIR Section 4.2, Impact 4.2-1: Sensitive Species, identifies southwestern willow flycatcher as wildlife species that may occur in the CPU area, which was in error as this species would have a low likelihood of occurrence within the CPU area, was not observed, and does not appear in CNDDDB searches. Similarly, tricolored blackbird and light-footed Ridgway’s clapper rail were identified in this section in error as these species would not occur within the CPU area. None of these species would occur because the CPU area does not support suitable habitats for these species, particularly due to the level of human disturbance and development in the area. The southwestern willow flycatcher and tricolored blackbirds require large spans of habitat (multi-tiered riparian forest and dense freshwater marsh, respectively) which do not occur within the CPU area. The southwestern willow flycatcher is present in San Diego County in late spring and summer with two main populations within San Diego County: (1) at the upper San Luis Rey River between East Grade Road and the La Jolla Indian Reservation and (2) at the Santa Margarita River in Camp Pendleton (Unitt 2004). Southwestern willow flycatchers are extremely sensitive to human activity in riparian areas, making the CPU area unsuitable for this species. The tricolored blackbirds also require suitable nearby foraging areas providing upland vegetation including grasslands, agricultural and disturbed areas, and irrigated pastures. The known light-footed Ridgway’s rail populations in San Diego County include: Tijuana River National Estuarine Research Reserve in Imperial Beach, University of California Reserve at Kendall–Frost in San Diego, San Dieguito river valley in Solana Beach, San Elijo Lagoon in Solana Beach, Los Peñasquitos Marsh in San Diego, Agua Hedionda Lagoon in Carlsbad, Batiquitos Lagoon in Carlsbad, the mouth of the San Diego River at the Sweetwater Marsh National Wildlife Refuge in Chula Vista, J Street Marsh in Chula Vista, and the Otay River leading to the San Diego Bay in Chula Vista (CDFW 2011). Although this species can occur within freshwater marsh, its primarily habitat is salt marsh, which is not available within the CPU area. As these species would not occur within the CPU area, the Area Specific Management

Directives for these species have also been removed from FEIR Table 4.2-4. Cooper's hawk which was identified as having a potential to occur within the CPU area in Section 4.2.2.3 of the PEIR, was also added to Table 4.2-3, indicating that it is known to occur within the CPU area.

A5-13 Comment noted. In response to this comment, the following policy has been added to the Mission Valley CPU:

IA-51 Trash Reduction. Place picnic areas and other public facilities that may generate trash as far away from the San Diego River as possible to reduce the possibility of attracting wildlife predators to sensitive areas.

A5-14 A correction to the figure reference has been made to the PEIR in response to this comment. The referenced CPIOZ areas are depicted in Figure 4.2-1, not Figure 4.1-1. MHPA areas are depicted on Figure 4.2-2.

B. ORGANIZATIONS

B1 Dealy Development

B1-1 Comment noted.

B1-2 Comment noted.

B1-3 Comment noted.

B1-4 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B1-5 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B2 Jacobs Vernon Project, LLC

B2-1 The PEIR analysis considers buildout of the entire CPU area based on proposed CPU land uses on a programmatic level.

B2-2 See response to comment B2-1.

B2-3 The information provided regarding the Atlas Specific Plan is general in nature only.

B2-4 The CPU's consistency with the Specific Plans, including the Atlas Specific Plan, is provided in Impact 4.8-1, Conflicts with Applicable Plans.

B2-5 Project-level impacts for specific development impacts will be evaluated once sufficient information is available to conduct meaningful environmental review. Alignments provided are meant to identify the overall roadway network rather than to define specific

limits of disturbance associated with ultimate road construction. No corrections to the figures referenced are needed.

B3 LVPG Riverwalk Ad Hoc Committee

B3-1 Comment is noted.

B3-2 Comment noted.

B3-3 See responses to comments B3-4 through B3-13.

B3-4 Consistency of the proposed CPU with the City's General Plan, including the Mobility Element, is addressed in PEIR Chapter 4.8.2.3, under Impact 4.8-1. The proposed CPU provides a balanced transportation network that supports bicycles, pedestrians, and transit, in addition to vehicles. As future development proceeds, project-specific transportation analysis and corresponding mitigation measures may additionally be identified that would include additional road improvements. The proposed CPU also identifies new roadway configurations and river crossings that would facilitate improved circulation within the CPU area.

B3-5 Parking regulations are applicable Citywide in the San Diego Municipal Code. As future development is proposed, each project would be evaluated individually for applicable parking requirements.

B3-6 This comment asserts that the environmental analysis did not adequately consider growth under the proposed CPU. The PEIR considers the potential impact of growth in relation to GHG emissions in Chapter 4.4. Specifically, Table 4.4-6 discloses the increases in GHG emissions that would occur under buildout of the proposed CPU compared to the existing condition and compared to buildout of the adopted community plan. As shown, the PEIR discloses that GHG emissions would increase compared to both scenarios. However, the analysis concludes that because the increase in density is focused around high-quality transit, the proposed land use densities would support the City of Villages strategy and result in less than significant impacts related to GHG emissions as it directly implements land use goals identified in the City's Climate Action Plan. Planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan and is consistent with SANDAG strategies identified in the Regional Plan.

B3-7 Focusing density within transit priority areas is consistent with the General Plan City of Villages Strategy as well as Strategy 3 of the Climate Action Plan by supporting a more efficient land use and mobility strategy. For purposes of the PEIR impact analysis, conservative trip generation assumptions were used consistent with SANDAG guidance. Regarding electric vehicles, the comment is noted.

B3-8 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

- B3-9 Refer to response to comment B3-7.
- B3-10 The PEIR analysis addresses potential impacts associated with construction of Riverwalk Street J at a program level of analysis. The City's Environmentally Sensitive Lands Regulations, the City of San Diego Biology Guidelines and MHPA Land Use Adjacency Guidelines will apply as applicable to the development of the Riverwalk Street "J" connection. Regarding flooding, the PEIR Section 4.7 provides a discussion of the applicable regulations for future projects. As discussed in the PEIR, impacts associated with river crossings would be less than significant.
- B3-11 Comment noted.
- B3-12 The No Project Alternative represents a land use alternative with less density. An additional lower density alternative was not identified as the assignment of density with the proposed CPU was a critical factor in developing a plan that would meet the goals of the City of Villages strategy and Climate Action Plan and maximize densities in proximity to the high-quality transit that exists and is planned in the CPU area.
- B3-13 Comment noted. See response to comments B3-2 through B3-12.

B4 Mission Valley Community Planning Group

- B4-1 Comment noted.
- B4-2 CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives." The PEIR includes the analysis of three alternative scenarios: (1) the No Project Alternative; (2) Alternative 1: No new roadway extensions of Street "J" or Fenton Parkway over the San Diego River, and (3) Alternative 2: Via Las Cumbres 2-Lane Roadway connection over the San Diego River. Each of these alternatives is discussed in PEIR Chapter 6. These alternatives constitute a reasonable range of alternatives under CEQA.
- B4-3 Future projects implemented within one of the two CPIOZ areas within the CPU area would be required to comply with additional regulations to ensure consistency with local plans and policies. Regarding potential impacts associated with river crossings, refer to response to comment B3-10.
- B4-4 The proposed CPU plans for the vision for Mission Valley taking into account land use and development and environmental characteristics of the planning area in light of changes in demographics, housing needs, community goals and regulatory requirements (see PEIR Chapter 3.1.1). The project objectives were developed to meet the underlying purpose of the CPU. Biological protections are already in place through the City's Municipal Code and regulations implementing the City's MSCP and MHPA.
- B4-5 As a program-level document, the PEIR does not propose any specific development projects and, thus, cannot provide detailed evaluation of future projects. However, the analysis anticipates that future development would occur within the CPU area and would

- be subject to applicable development regulations and requirements of the proposed CPU and the PEIR. Future development within the CPU area would involve subsequent approval of public and private development proposals through both ministerial and discretionary reviews in accordance with zoning and development regulations, and proposed CPU implementing actions and policies. These subsequent activities may be public (i.e., road/streetscape improvements, parks, public facilities) or private projects, and are referred to as “future development” or “future projects” in the text of the PEIR. MHPA lands within the CPU area are shown in Figure 4.2-2 and are evaluated in Chapter 4.2 of the PEIR.
- B4-6 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B4-7 See response to comment B4-2.
- B4-8 The comment requests the inclusion of a table delineating proposed changes in land uses compared to existing conditions. The environmental setting is described in Chapter 2 of the PEIR and in the beginning of each issue specific analysis chapter in Chapters 4.1 through 4.14. For existing zoning, please visit the City website at <https://www.sandiego.gov/development-services/zoning-maps>.
- B4-9 See response to comment C9-6.
- B4-10 See response to comment C9-6.
- B4-11 The PEIR states that mitigation measures MM-TR-1 through MM-TR-41 would not be feasible and impacts would remain. The City Council will consider findings regarding infeasibility and a Statement of Overriding Considerations prior to approval of the proposed CPU.
- B4-12 The Public Facilities Financing Plan is now referred to as an Infrastructure Fee Study (IFS). The IFS for the Mission Valley community will be presented to City Council for consideration subsequent to approval of the proposed CPU. See also response to comment B4-11.
- B4-13 PEIR Chapter 4.13, Transportation, discusses pedestrian facilities proposed within the CPU area and identifies that “[t]he City of San Diego Pedestrian Master Plan defines size route types, each suggesting a level of treatments or features that best supports the specific area’s walking environment. Paseos are one route type that is particularly suitable within the context of Mission Valley.” The discussion explains how implementation of the various pedestrian facilities would affect the pedestrian environment. Figure 4.13-6 identifies proposed CPU pedestrian route types. With respect to developing walkable communities, the proposed CPU is consistent with SANDAG’s Regional Plan, SANDAG Regional Bike Plan, City of Villages Strategies, General Plan Mobility Element, and the City’s Bicycle Master Plan.

B4-14 The City adopted the Climate Action Plan in December 2015, which serves as a Qualified GHG Reduction Plan under CEQA Guidelines §15183.5. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. Through the CAP, the City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Analysis within the PEIR directly tiers off of the CAP's PEIR for cumulative GHG emissions and consistency with the City's CAP is used to evaluate the significance of the proposed CPU's GHG impact. See PEIR Chapter 4.4. Regarding the use of a VMT metric, refer to response to comment C9-6.

B4-15 See responses to comment B4-14 and C9-6.

B4-16 The Daily Mode Share Data from the Regional Model is provided below and shows a doubling in the daily active transportation mode share with the Mission Valley CPU.

Mission Valley Community Planning Area		
Mode	Daily Resident Mode Share	
	2012 (Base Year Scenario)	2050 (Plan Update Scenario)
Drive	82%	65%
Transit	5%	8%
Active	12%	24%
Other	1%	2%

Additionally, the Peak Period Resident Commute Modes Share Data from the Mode Share Planning Tool is provided below and shows a 350 percent increase in peak period resident active transportation mode share.

Mission Valley Community Planning Area		
Mode	Peak Period Resident Commute Mode Share	
	2012 (Base Year Scenario)	2035 (Planning Tool*)
Drive	92%	80%
Transit	6%	13%
Active	2%	7%
Other	0%	0%

B4-17 The proposed CPU accommodates increased growth in the planning area compared to the adopted CPU, which corresponds to an increase in VMT. The comment makes reference

- to a statement in the PEIR that GHG emissions will be reduced due to increased regulations and cleaner technologies that reduce mobile-source emissions. It is correct that while implementation of the proposed CPU would increase VMT, GHG emissions would be reduced over the same period. As detailed in Chapter 4.4.2.2 of the PEIR, annual GHG emissions were calculated for both the adopted Community Plan and the proposed CPU at buildout using CalEEMod and EMFAC. Reductions were taken to account for emission reductions that would result from regulation and cleaner technologies which is customary in GHG emission modeling. Applicable standards are referenced in PEIR Section 4.4.1.2, such as the Corporate Average Fuel Economy (CAFÉ) standards. See also response to comment B4-14.
- B4-18 The PEIR evaluates VMT over the existing (2018) conditions (see PEIR Table 4.4-6). As shown in Table 4.4-6, GHG emissions would be greater for proposed land uses identified within the CPU area (2018) when compared to buildout of the CPU area based on the adopted Community Plan. See also response to comment B4-17.
- B4-19 See responses to comments B4-14 and B4-16.
- B4-20 The feasibility of mitigation measure MM-AQ-2 was demonstrated by the Air Quality Technical Study prepared for the Stadium Reconstruction Project. Notwithstanding the inclusion of this mitigation measure, impacts associated with construction-related air quality impacts would be significant and unavoidable. Any future development by SDSU at the Stadium Site would be subject to additional environmental review under CEQA and air quality impacts and mitigation would be identified.
- B4-21 As detailed in PEIR Chapter 4.1, impacts associated with health risks from exposure of sensitive receptors to toxic air emissions would be less than significant. Therefore, no mitigation measures would be required.
- B4-22 Response time standards are identified in the Public Facilities, Services, and Safety Element of the General Plan. Consistent with relevant policies, the City determines fire station location, timing, and crew size planning as the population of the city grows through identified performance measures (see PEIR Tables 4.11-3 and 4.11-4). If response times are not met, additional facilities may be necessary. As a program-level document, the PEIR does not propose any specific development projects. The proposed CPU contains policies that support identifying funding to support the development and upgrading of fire and police stations within the CPU area; however, implementation of the proposed CPU would result in impacts that would be significant and unavoidable since impacts associated with construction and operation of any future facility are not known at this time.
- B4-23 PEIR Table 4.11-1 shows the total student enrollment of public schools serving the Mission Valley community, including excess and shortfall of capacity versus enrollment. The analysis of potential impacts associated with the proposed CPU is based on San Diego Unified School District (SDUSD) assumed generation rates (see PEIR Table 4.11-5). According to SDUSD, the potential increase in students from implementation of the proposed CPU would likely impact district facilities to the point of reaching capacity. While SDUSD would collect fees from future development to fund school facilities, if needed, this

- impact would be significant and unavoidable since impacts associated with the construction and operation of any future facility are not known at this time and could result in significant environmental impacts. Projected student population was evaluated based on SDUSD guidelines.
- B4-24 Comment noted. For a discussion of walkable communities and the proposed CPU policies associated with meeting General Plan policies, see PEIR Chapter 4.13.
- B4-25 As a program-level document, the PEIR does not propose any specific development projects and, thus, cannot provide detailed evaluation of future school sites. See response to comment B4-23.
- B4-26 See responses to comments B4-23 and B4-25.
- B4-27 The impact analysis contained in PEIR Chapter 4.11 and Table ES-1 are consistent, both stating that the impacts associated with parkland would be significant and unavoidable.
- B4-28 The PEIR acknowledges that there may be a need for additional parkland to serve the community at buildout of the CPU and that additional parkland may be attained through parkland included in new development park equivalencies as provided for through CPU policies. As a program-level document, the PEIR does not propose any specific development projects, and thus cannot provide detailed evaluation of future park sites or parkland equivalencies. See also responses to comments B4-23 and B4-25.
- B4-29 Potential noise impacts associated with the proposed CPU are detailed in PEIR Chapter 4.9 and do not rely on landscaping as noise attenuation. The City acknowledges that landscaping does not attenuate noise. The proposed CPU policy NOI-2 has been revised to remove reference to landscaping as follows: “Support the use of site planning techniques ~~and landscaping~~ for new development to help minimize the exposure of noise sensitive uses to trolley line noise.”
- B4-30 The PEIR presents a range of reasonable alternatives as required pursuant to CEQA Guidelines §15126.6. See PEIR Chapter 6.0.
- B4-31 Designated historical resources are identified in the PEIR in Table 4.6-1. Additionally, the PEIR includes a Historic Context Statement as Appendix H that identifies information about the history and themes applicable to development in the valley and identifies a number of important developers and architects along with specific buildings or developments that relate to an important theme or style. The PEIR is a program-level document and does not include site specific analysis of historic character of individual buildings.

B5 North Park Planning Committee

- B5-1 Comment noted.

- B5-2 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted. The commenter states that neither MM-TR-22 nor MM-TR-39 are included as identified improvements in the proposed CPU. Comment noted. These measures are not included in the proposed CPU because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU and General Plan goals as referenced in Table 1 of the proposed CPU Mobility Element, as well as Climate Action Plan (CAP) goals (see DEIR pages 4.13-38-39).
- B5-3 With respect to the commenter proposed measures, this location is outside of the Mission Valley Community Plan boundary. The recently adopted North Park Community Plan identified Texas Street as 3-Lane Major Arterial with Class II bike lanes.
- B5-4 Comment noted.
- B5-5 See response to comment C9-6.
- B5-6 (1) Synchronization of traffic light north of Camino Del Rio South: As stated on page 120 of the Mission Valley CPU Mobility Technical Report, signal timing was assumed to be optimized under the Proposed Plan 2050 conditions. All traffic signals along Texas Street were optimized.

The proposed CPU Implementing Actions IA-22, IA-29, and I-A-30 state the following:

- IA-22 Interchanges. Coordinate with Caltrans and SANDAG to implement freeway interchange enhancements to improve operations and safety for all modes at Interstate 8 interchanges with Mission Center Road and Qualcomm Way/Texas Street and the I-15 and SR163 interchanges at Friars Road.
- IA-29 Signal Coordination. Coordinate with Caltrans to improve signal coordination at freeway on-/off-ramp locations.
- IA-30 ITS Planning. Continue to implement the City of San Diego Traffic Signal Communications Master Plan.

The intersections of Camino Del Rio North and Qualcomm Way and Rio San Diego Drive and Qualcomm Way are identified for improvements in the City of San Diego Traffic Signal Communications Master Plan. Specific operational improvements such as synchronization and adaptive signal control would be evaluated at the project-level.

- (2) Protected bike lanes from Camino Del Rio South to Friars Road: The proposed CPU proposes a Class II bike lane along Texas Street, north of Camino Del Rio South. Per the proposed CPU IA-22, the City will coordinate with Caltrans and SANDAG to implement freeway interchange enhancements to improve operations and safety for all modes at Interstate 8 interchanges with Qualcomm Way/Texas Street.

(3) Constructing a northbound right-turn lane at Texas Street and Camino Del Rio South: This improvement would require either additional right-of-way or removal of the existing bike lanes along Texas Street. A project study report (PSR) is needed to determine the best configuration to accommodate future pedestrian, bicycle, and vehicular traffic.

B5-7 Comment noted.

B6 San Diego Audubon Society

B6-1 Potential impacts to the San Diego River are evaluated at a program level. See responses to comments B3-10 and B4-3.

B6-2 The potential for noise impacts on wildlife is discussed in PEIR Chapter 4.2. The PEIR Chapter 4.2 includes a discussion of the City's MHPA Land Use Adjacency Guidelines which address the issue of noise as it relates to potential impacts on biological resources. In compliance with these guidelines, projects are required to include design measures to minimize noise impacts. As a program-level document, the PEIR does not propose any specific development projects and, thus, cannot provide detailed evaluation of future projects; however, the proposed CPU would implement the City's Land Use Adjacency Guidelines as detailed in PEIR Table 4.2-5, which provides a detailed consistency analysis showing how future projects within the CPU area, adjacent to MHPA land, would include measures to be incorporated into the design of projects adjacent to the MHPA to reduce potential indirect impacts, including noise impacts on wildlife. Additionally, the San Diego River is located within a heavily urbanized environment that is currently subject to noise.

B6-3 The protection of wildlife corridors is discussed in PEIR Chapter 4.2. The proposed CPU is part of the Urban Habitat Area of the MSCP and the City's MSCP Guidelines require development projects within this area to restore native vegetation along the San Diego River. See responses to comments B3-10 and B4-3.

B6-4 Cumulative biological impacts are evaluated in PEIR Chapter 5.1.2. While future projects could contribute to incremental biological resource impacts, these projects would have to comply with applicable CPIOZ regulations, proposed CPU policies, and the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines. See responses to comments B3-10 and B4-3.

B6-5 The PEIR does not address the potential impacts to birds that may result from individual projects as project level detail is not available. The analysis provides a programmatic framework that would ensure future development is consistent with applicable CPIOZ regulations, proposed CPU policies, the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines. This existing regulatory framework would address potential impacts related to bird strikes. See responses to comments B3-10 and B4-3.

B6-6 The PEIR acknowledges that there may be a need for additional parkland to serve the community at buildout of the CPU and that additional parkland may be attained through parkland included in new development park equivalencies as provided for through CPU policies. It is not clear from the comment what habitat areas may be overused as a result of

parkland deficiency. The river valley and the steep slope areas are the two main habitat areas within the CPU area and only the river valley has a pedestrian/recreational path that could be used. Based on the limited opportunity for recreation within the CPU's biological resources areas, increased impacts to biological resources resulting from parkland deficiencies is not reasonably foreseeable.

B6-7 The proposed project's potential impacts associated with flooding and floodplains is analyzed in PEIR Chapter 4.7. Future projects which propose improvements within the floodplain areas would be required to comply with development requirements within a floodplain. As discussed in PEIR Chapter 4.7.2.3 (Flooding and Drainage Patterns), as a program-level document, the PEIR does not propose any specific development projects and, thus, cannot provide a specific analysis associated with all potential construction/development projects. Therefore, impacts associated with development within areas within the Provisionally Accredited Levee (PAL; those areas located within river flood zones) are considered significant and unavoidable.

B6-8 The proposed project's potential impacts to water quality are analyzed in PEIR Chapter 4.7.

B7 Save Our Heritage Organization

B7-1 Comment noted.

B7-2 Comment noted.

B7-3 Future projects would be required to follow the consultation process required under AB 52.

B7-4 The "high sensitivity" area has since been expanded to address this comment, and the revised figure is included in the Final PEIR as Figure 4.6-1.

B8 Westfield, LLC

B8-1 Comment noted. See responses to comments B8-2 through B8-45.

B8-2 Comment noted.

B8-3 Comment noted.

B8-4 Comment noted.

B8-5 Figure 4 of the CPU will be updated to correctly identify the existing land use designations of the Mission Valley East site, and Figure 3.3.-1 will be updated to match the CPU.

B8-6 The referenced sentence in the DEIR has been corrected to state: "Portions of the CPU area are zoned according to the Mission Valley PDO base zones or citywide base zoning districts." Regarding proposed zoning, refer to <https://www.sandiego.gov/planning/community/cpu/missionvalley/> for a map of the

- proposed zoning. The proposed zoning is consistent with that evaluated in the PEIR and represents an implementation method for future projects under the plan.
- B8-7 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-8 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-9 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-10 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-11 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-12 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-13 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-14 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-15 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-16 This Mission Valley Community Plan identifies the site as a location for a “Potential Future Park/Urban Amenity”. The exact size and design would be identified at a future time through a redevelopment process. The traffic modeling input does not provide a requirement related to park size.
- B8-17 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-18 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-19 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-20 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

- B8-21 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-22 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-23 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-24 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-25 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-26 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-27 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-28 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-29 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-30 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-31 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-32 The commenter misinterpreted the map. The existing Class III facility is proposed to be upgraded to a Class II facility. Comment noted.
- B8-33 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-34 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-35 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B8-36 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

- B8-37 The comment does not address the adequacy or completeness of the Draft PEIR.
- B8-38 The comment does not address the adequacy or completeness of the Draft PEIR.
- B8-39 Actual traffic counts, rather than the base year model outputs, were utilized for the Existing conditions analysis.

Section 4.0 (Modeling and Forecasting) of the MVCPU Mobility Technical Report documented the modeling and adjustment process for the MVCPU. As stated in Section 4.1.3 and 4.1.4 of the MVCPU Mobility Technical Report, model results were compared to historic counts and model inputs were adjusted in order to calibrate the model.

Specifically, due to the unique land use nature of Mission Valley Mall (part-time employment, high turnover restaurants) adjustments were made to the square footage and associated number of employees in order to ensure that traffic volumes projected by the model for roadways adjacent to Mission Valley Mall would meet the calibration criteria.

- B8-40 Redevelopment assumptions were developed and applied throughout the community to identify future CPU land uses, including for the Westfield Mission Valley site since actual land uses are unknown at this time. The exact land uses would be identified when a future project development is proposed and a project-specific traffic analyses would be prepared.

The traffic modeling inputs do not equate to a requirement related to potential land use sizing for the Westfield Mission Valley site.

- B8-41 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

- B8-42 The modeling process included extensive review of future traffic volumes, especially locations where future traffic volumes are projected to be lower than existing. In the vicinity of Friars Road between SR-163 and Mission Center Road, two additional roadway connections are proposed as part of the Mission Valley CPU. The Hazard Center Drive extension and Riverwalk Street “J” will provide alternative routes and further contribute to the reduction in future traffic volumes along Friars Road.

In addition, Section 4.0 of the Mission Valley CPU Mobility Technical Report states that the future year traffic volumes were developed using the SANDAG Series 13 Transportation Forecast Model (Regional Model) for the Year 2050. This model is based off the SANDAG San Diego Forward: The Regional Plan. Based on Appendix N of the Regional Plan, there would be significant changes in the mode share for the San Diego region by the Year 2050. Under the Revenue Constrained program, the percentage of commuters driving to work would decrease, whereas the percentage of workers telecommuting, walking, biking, or taking transit to work would increase. In addition, the Regional Plan proposes a comprehensive active transportation network and improved access to transit which would encourage the change in mode share. This would result in lower or less than otherwise anticipated growth in traffic volumes throughout the San Diego region.

B8-43 See response to comment B8-42. In addition, the Regional Model takes into account several factors when projecting traffic volumes, including roadway capacity, travel time, and access points (zone connectors) available to the Traffic Analysis Zone.

B8-44 Additional study is needed at the project level to evaluate near term conditions and project direct impacts to define needed project-level improvements. Due to uncertainty related to development and traffic impacts that may materialize over time, this is not possible at the programmatic level.

B8-45 See response to comment C9-6.

B9 H.G. Fenton Company

B9-1 Comment noted.

B9-2 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-4 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-5 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-6 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-7 The City is unable to rely on the measures identified to reduce the because they have been determined to be infeasible as discussed in PEIR Section 4.13. Mitigation Measures MM-TR-63 and MM-TR-64 provide for future review of Specific Plan proposals and continued coordination with Caltrans, SANDAG and MTS.

B9-8 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

B9-9 High level feasibility assessment was conducted for the roundabout proposed at the intersection of River Run Drive and Rio San Diego Drive. A concept drawing is included as Figure 3-19 of the Mission Valley CPU Mobility Technical Report. Additional studies would be required at a project level to address potential impacts associated with specific construction plans. A roundabout was proposed at this intersection to reduce delay and emissions, and improve traffic flow and safety.

B9-10 As stated on page 43 of the Mission Valley CPU Mobility Element, one of the Implementing Actions of the proposed CPU is to provide a continuous network of safe, convenient, and attractive bicycle facilities.

The proposed CPU assumes additional residential development around Metropolitan Drive. In order to meet the vision of the community plan update, bicycle facilities were proposed along Metropolitan Drive to provide a comprehensive bicycle network within the community. The PEIR acknowledges that the roadway impact would remain significant and unavoidable; however, as discussed in the PEIR, mitigation to reduce the impacts would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU mobility vision and other proposed CPU and General Plan goals and policies regarding walkability and bicycling, which are consistent with the City of Villages strategy, and are therefore not feasible (see PEIR page 4.13-39).

- B9-11. The proposed CPU proposes several new roadway connections throughout the community, including extending Hazard Center Drive from the existing western terminus to Avenida Del Rio. This new parallel connection provides additional capacity for east-west travel, alleviating traffic from Friars Road, thus resulting in the reduced traffic observed by the commenter.
- B9-12. See response to comment B8-42. The Regional Model takes into account several factors when projecting traffic volumes, including roadway capacity, travel time, and access points (zone connectors) available to the Traffic Analysis Zone (TAZ).
- B9-13 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B9-14 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- B9-15 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C. INDIVIDUALS

C1 Cherie Ross

- C1-1 The commenter's opposition to the Via Las Cumbres extension, referred to as Riverwalk "Street J" in the proposed CPU is noted. The proposed CPU includes Community Plan Implementation Overlay Zones (CPIOZ) to provide supplemental development regulations that are tailored to specific sites within the CPU. The proposed CPU includes two CPIOZs for portions of the CPU area: the Hillside Conservation, Design, and Height Limitation CPIOZ and the San Diego River Subdistrict CPIOZ. The San Diego River CPIOZ would include the River Corridor Area and the River Influence Area and is intended to implement the San Diego River Park Master Plan. The development regulations would apply to future development, including proposed road improvements, within the San Diego River Subdistrict CPIOZ areas. Additionally, any new development that would impact environmentally sensitive lands would require future discretionary review, and the site-specific impacts of such development would be further analyzed at that time.

C2 Christine August

C2-1 Comment noted.

C2-2 As shown in Figure 14 of the Mission Valley Community Plan Working Draft for Community Review (February 6, 2019), Riverwalk Street “J” would provide a direct connection between Friars Road and I-8, providing a more efficient route to the regional transportation network. Additionally, as shown in Figure 14, the Riverwalk development would extend Riverwalk Drive from the existing western terminus point to Street “J” and beyond, providing a connection to Fashion Valley Road and the Fashion Valley Trolley stop. An additional Trolley stop would be provided within the Riverwalk development. The Riverwalk Specific Plan will define additional local roadway connections as a part of the specific plan process.

Riverwalk Street “J” as a four to two-lane major street, grade separated from the San Diego Trolley, will provide a crucial north-south connection for the Mission Valley community in the event of flooding or emergency. In conjunction with the proposed Riverwalk Street “J” four to two-lane connection, Fashion Valley Road is proposed to be widened to a 4-lane major street with cycle track and raised to the 15-year flood level to reduce the frequency that the roadway is impassable due to flooding.

Pedestrians are separated from the traffic flow, as well as cyclists (via the Class II bike lanes); thus, limiting conflicts with first responders.

C2-3 Potential noise impacts associated with implementation of the proposed CPU is addressed in PEIR Chapter 4.9. As discussed therein, Proposed CPU policy NOI-2 supports the use of site planning techniques and landscaping for new development to help minimize the exposure of noise sensitive uses to trolley line noise. Additionally, the General Plan Noise Element contains policies to minimize excess train horn noise through the establishment of train horn “quiet zones.” As a program-level document, the PEIR does not propose any specific development projects. The mitigation framework is provided, giving future projects guidelines for required mitigation measures that would be implemented at a project level. Since the final designs of future projects are unknown, the programmatic analysis conservatively disclosed the impact as significant and unavoidable. Future discretionary projects will be required to provide disclose impacts and identify appropriate mitigation measures (where applicable).

C2-4 The comment does not address the adequacy or completeness of the Draft PEIR.

Under the Mission Valley CPU, an extension of Via Las Cumbres will serve the Riverwalk property and provide additional access from the property to Friars Road. The Mission Valley CPU does not propose to extend Via Las Cumbres beyond the Riverwalk property.

Please see response to comment C2-3. Constructing additional eastbound lanes would not relieve traffic congestion along Friars Road as all traffic congestion during the peak hours occurred at the downstream intersections, especially at the SR-163/Friars Road interchange.

C2-5 As detailed in Chapter 4 of the Transportation Impact Analysis (PEIR Appendix D), transportation analysis was based upon the Regional Model. The Regional Model takes into account projected employment type, destination, land use, accessibility to transit, bike network, and pedestrian network when assigning trips to the transportation network. For example, the model will match income to job when determining whether a person who lives in Mission Valley would match with a job in Mission Valley.

A combination of land use mix and transportation demand management, as well as mode shift (from single occupancy vehicle to carpool, transit, bike, walk, work at home) results in the traffic volumes shown in the TIS and EIR.

The comment related to the City's taxing authority is noted.

C2-6 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR.

C2-7 Site-specific designs for proposed improvements are not included in the proposed CPU. As shown on page 42 of the Mobility Technical Report, one of the existing westbound left-turn lanes would be converted to a transit only lane with transit signal priority. In this case, the transit phase would get a head start before the westbound left-turn lane, giving priority to buses heading toward the Fashion Valley Transit station. There is no proposed project to widen Fashion Valley Road at Friars Road; however, this does not preclude widening of this roadway or intersection concurrent with redevelopment.

C2-8 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR.

C2-9 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR.

C2-10 Comment noted.

C3 Dennis McGibben

C3-1 Comment noted.

C3-2 Potential impacts associated with fire protection services resulting from project implementation of the proposed CPU are detailed in PEIR Section 4.11. As discussed therein, it is noted that implementation of the proposed CPU would result in increased demand for fire protection services due to population growth at buildout resulting in the need for new or altered facilities (see PEIR page 4.11-17). The proposed CPU supports the collocation of a new Fire-Rescue station just outside of the CPU area at 5215 Gaines Road with the existing SDPD facility at that site. Beyond this potential Fire-Rescue station, additional stations may be required to serve the buildout population and future facilities would be planned to meet community needs based on the General Plan's standards. As a program-level document, the PEIR does not propose any specific development projects,

and thus cannot provide detailed guidance relating to timing or locations of new fire stations. Through compliance with existing regulations, and CPU policies aimed at increasing fire safety, any future construction would be required to consider the need to increase or improve fire service facilities which would be subject to a separate environmental review at the time future projects are evaluated.

C4 Eric Albert

- C4-1 Comment noted. See responses to comments C4-2 through C4-17.
- C4-2 Impacts associated with dust and toxins from construction activity are addressed in PEIR Chapter 4.1. Health risks associated with mobile and stationary sources is assessed based on rules and regulations issued by the San Diego Air Pollution Control District. As a program-level document, the PEIR does not propose any specific development project. However, through regulatory compliance, all future projects within the CPU area that could exceed toxic exposure levels, would be required to demonstrate measures to reduce potential health risk exposure. Likewise, the proposed CPU incorporates policy measures to ensure future projects consider air quality in project designs for projects in close proximity to freeways. Overall, future development projects could be required to include project-level health risk assessments to address potentially significant concentrations of diesel particulate matter, high concentrations of which could result in health risks. Impacts related to noise is discussed in PEIR Chapter 4.9, and potential construction traffic (including project phasing) impacts are included in PEIR Chapter 4.13.
- C4-3 The comment does not address the adequacy or completeness of the Draft PEIR. For a complete description of the proposed CPU, see PEIR Chapter 3.0, Project Description.
- C4-4 The comment does not address the adequacy or completeness of the Draft PEIR. See PEIR Figure 3.3-1 for the proposed land uses. Comment noted.
- C4-5 The vision of the CPU is to support higher density residential development near transit. Impacts related to anticipated increases in population density are discussed throughout Chapter 4 of the PEIR.
- C4-6 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR. Infrastructure required to support the anticipated growth is detailed in PEIR Chapter 4.12 (Public Utilities and Infrastructure). As future projects are developed, the need for improvements to facilities and infrastructure will be evaluated. As a program-level document, physical impacts associated with the construction of storm water, sewer, water distribution, and communication systems are found to be significant and unavoidable at this program level.
- C4-7 The Riverwalk development area is identified as the Riverwalk Specific Plan in the proposed CPU. The proposed Levi-Cushman/Riverwalk Specific Plan that has been in process with the City is identified in the land use section of the PEIR. Additionally, the PEIR analysis included assumptions for development of the Riverwalk Specific Plan. Assumptions included development of the site with approximately 4,300 dwelling units,

- 850,000 square feet of office, 129 square feet of retail/commercial, 23 acres of active park, and 80 acres of open space park/preserve areas. The environmental analysis incorporated these assumptions and addresses the cumulative impacts of this project combined with build-out of the CPU area.
- C4-8 Potential noise impacts associated with the proposed CPU are detailed in PEIR Chapter 4.9. As discussed therein, the City’s General Plan includes policies regarding the preparation of acoustical studies and interior noise guidelines that require noise attenuation measures to reduce potential noise levels to acceptable levels. Existing regulations are in place to ensure that future development provides for noise attenuation measures to maximize compatibility between the trolley line and noise sensitive land uses. The proposed CPU policy NOI-2 has been revised to remove reference to landscaping as follows: “Support the use of site planning techniques ~~and landscaping~~ for new development to help minimize the exposure of noise sensitive uses to trolley line noise.”
- C4-9 Therefore, the PEIR provides a mitigation framework, setting forth guidelines for detailed, project-specific analysis and mitigation measures that would be implemented, as needed, at a project level.
- C4-10 See response to comment C4-5.
- C4-11 Potential impacts to the San Diego River are evaluated. Where future development is proposed within the San Diego River area, the requirements of the San Diego River CPIOZ would apply including application of the City’s Environmentally Sensitive Lands Regulations, the City of San Diego Biology Guidelines and MHPA Land Use Adjacency Guidelines. San Diego River Subdistrict CPIOZ includes the River Corridor Area and the River Influence Area and is intended to implement the San Diego River Park Master Plan (see PEIR Section 4.2).
- C4-12 The proposed CPU’s potential impacts associated with flooding and floodplains is analyzed in PEIR Chapter 4.7. As discussed therein, there are a total of 447 acres within the 100-year floodway; however, as delineated in PEIR Table 4.7-5, most of the 100-year floodplain is occupied by land designated for recreation and open space, although there are a number of commercial and residential land uses in the 100-year floodplain including several hotels, car dealerships, and residential developments (see PEIR page 4.7-3). Future projects which propose improvements within the floodplain areas would be required to comply with development requirements within a floodplain. Impacts associated with development within areas within the Provisionally Accredited Levee (PAL; those areas located within river flood zones) are considered significant and unavoidable. Therefore, the PEIR provides a mitigation framework, giving future projects guidelines for detailed, project-specific analysis and mitigation measures that would be implemented, as needed, at a project level.
- C4-13 As stated in Section 4.11 of the PEIR, “[t]he proposed CPU includes approximately 75 additional acres of population-based parkland, bringing the grand total of population-based parks at buildout to approximately 94.15 acres, about 108.85 acres short of the 203-acre goal. Including park equivalencies, the park total at buildout would be 152.79 acres.

- C4-14 Potential impacts to the visual and neighborhood character of the CPU are analyzed in PEIR Chapter 4.14. As discussed therein, future projects in the CPU area would blend in with the existing urban framework through established height and setback regulations and would not result in new obstructions to views from public areas where views exist. Additionally, the CPU includes policies related to blocks and lots, streetscapes, building placement and orientation, and building form and design to ensure the on-going beautification of the neighborhood character of the areas. The proposed CPU includes policies that support the incorporation of street trees into sidewalk buffer areas near schools, transit areas, and private development to increase shade, promote carbon sequestration, shield pedestrian pathways, and provide additional vegetation in the urban environment. Therefore, implementation of the proposed CPU would enhance the neighborhoods of the CPU area.
- C4-15 The CPU is a planning document intended to guide future development throughout the CPU area. It provides detailed policies and implementation guidance that would be applicable to many specific details of future development. The PEIR provides a mitigation framework that would be applicable to future development to ensure that, as feasible, potentially significant impacts would be reduced to less than significant levels.
- C4-16 Comment noted.
- C4-17 Comment noted.

C5 Felicity Senoski

- C5-1 Comment noted. See responses to comments B3-1 to B3-13.
- C5-2 Emergency response time as it relates to public services (i.e., fire and police services) is discussed in PEIR Chapter 4.11). As discussed therein, it is acknowledged that implementation of the proposed CPU would result in an increase in overall population that could require additional fire and police services. Any future construction of police or fire service facilities would be subject to separate environmental review at the time design plans are available. Future development would be required to ensure projects include adequate access for emergency responders. Additionally, the City would collect fees from future development to fund public facilities, and the proposed CPU contains policies that support identifying funding to develop and upgrade these facilities. Notwithstanding future requirements, the project-specific details regarding impacts resulting from the need for new facilities are not known at this time and, therefore, impacts associated with public services are found to be significant and unavoidable.

With respect to cumulative impacts, PEIR Chapter 5.1.11 evaluates population growth in the CPU area along with that anticipated in the surrounding Community Plan areas finding that there would be a cumulative increased demand for public services and facilities. The project's construction of a satellite police station on the former Stadium site and collocation of a new Fire-Rescue station just outside of the CPU area with the existing San Diego Police Department facility at that site would assist in the alleviation of the project's cumulative impact; however, cumulative impacts would remain significant and unavoidable.

- C5-3 All future projects would be subject to the City's regulations addressing storm water and associated infrastructure. Impacts related to storm water and infrastructure are discussed in Chapter 4.11, Public Services and Facilities, and Chapter 4.12, Public Utilities and Infrastructure.

C6 Jim and Martha Grant

- C6-1 Comment noted.
- C6-2 See responses to comment letter B3. With respect to potential impacts to the San Diego River and potential flooding impacts, see responses to comment C4-11 and C4-12, respectively.
- C6-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C7 June and William Krantz

- C7-1 Potential impacts related to fire, police coverage, and public services are discussed in PEIR Chapter 4.11 of the PEIR, Public Services and Facilities. Also see response to comment C8-1.

C8 Marilyn Lewis and Irving Tannenhaus

- C8-1 The proposed CPU provides a framework to guide development in Mission Valley. The Riverwalk development project is being processed independently, within its own CEQA review and thus specific impacts attributable to that project are not addressed in the PEIR.
- C8-2 Potential noise and traffic impacts are discussed in PEIR Chapters 4.9 and 4.13, respectively and address impacts associated with roadway improvements. Emergency services (police, medical, fire) and conflicts with emergency response plans are addressed in PEIR Chapter 4.11, Public Services and Facilities, and Chapter 4.5, Hazards and Hazardous Materials, respectively.
- C8-3 Potential impacts associated with drainage and flooding are discussed in PEIR Chapter 4.7. The proposed CPU includes policies to address storm water runoff to reduce the potential for flooding, as well as infrastructure design to reduce the impact of storm water runoff when it occurs. By adhering to the requirements of the City's Stormwater Standards augmented with the proposed CPU policies, future projects would not be expected to increase the rate or amount of surface runoff generated from the community in a manner which would result in substantial erosion or liquefaction. Parking availability is not a significant impact under CEQA. The availability of adequate water is evaluated in PEIR Chapter 4.12. As discussed therein and illustrated in the Water Assessment Study prepared, there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur within the City by 2040.

C9 Mary Shepperd

- C9-1 Comment noted. See response to comment letter B3.
- C9-2 Future development proposals will originate from private developers, or state and local agencies (public projects), and will be required to comply with standards in place at the time of development. Approval of the proposed CPU would not specifically permit the construction of an individual project, and no specific development details are available at this program level of analysis. CEQA Guideline §15168 provides the basis for the preparation of a Program EIR for projects, like community plans, where future actions would be governed by similar rules, regulations, or plans (see CEQA Guideline §15168(a)). As a program-level document, the CPU PEIR provides a mitigation framework, setting forth future project guidelines for required mitigation measures that would be implemented at a project level. Large projects such as the Riverwalk and Stadium site development are appropriately considered in the analysis as the PEIR assumes buildout of these sites in the analysis.
- C9-3 With respect to potential impacts from crossings of the San Diego River, see response to comment C4-11. Additionally, the PEIR Chapter 6 includes Alternative 1 which differs from the proposed CPU in that it would not include the Fenton Parkway roadway extension or the proposed Riverwalk Street “J” connection over the San Diego River.
- C9-4 Potential impacts associated with proposed mobility improvements are discussed in PEIR Chapter 4.13.
- C9-5 The comment does not address the adequacy or completeness of the Draft PEIR.
- C9-6 The LOS methodology is based on the current City of San Diego’s Traffic Impact Study Guidelines. However, the City is currently in the process of updating the guidelines to use VMT as the threshold in determining transportation impacts consistent with SB 743. Pursuant to the new CEQA Guidelines for analyzing transportation impacts, implementation of the VMT standards need not be in place until July 1, 2020. For reference, the Mobility Technical Report includes a section (Chapter 4.2.1) on VMT for GHG analysis.

The development of the Mission Valley CPU transportation recommendations was not based solely on vehicular LOS analysis. As documented in the Mobility Technical Report, the following analysis was also conducted to develop transportation recommendations: pedestrian demand, pedestrian safety, pedestrian environment quality evaluation (PEQE), and pedestrian connectivity; bicycle demand, bicycle safety, bicycle facility level of traffic stress (LTS) and bicycle connectivity; transit demand, safety near transit, transit quality, and quality connectivity to transit.

Consistent with the Mission Valley Community Plan Vision (Page 17 of the Mission Valley Community Plan), the transportation recommendations were developed to provide a transportation network that is walkable, bikeable, accessible to freeways, transit, recreation and employment opportunities, and shopping. The transportation recommendations

embrace key community resources such as the San Diego River Trail and the Trolley system, leveraging the community's natural landscape and infrastructure investment to enhance regional multimodal connections. The Mission Valley CPU incorporates well connected separated bicycle facilities and landscape buffered sidewalks/paseos to improve active transportation mobility throughout the community and first and last mile connections to trolley stations.

- C9-7 Planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan and is consistent with SANDAG strategies identified in the Regional Plan. PEIR Chapter 4.13 analyzes potential traffic-related impacts associated with buildout of the CPU. The CPU includes certain road improvements and the PEIR provides a mitigation framework aimed to reduce significant impacts. The City will continue to implement emergency and traffic control measures to manage road closures as a result of flooding and other unforeseen events.
- C9-8 Emergency response time at it relates to public services (i.e., fire and police services) is discussed in PEIR Chapter 4.11. As discussed therein, the proposed CPU would result in an increase in overall population, that could require additional fire and police services. New police facilities may be required to achieve and maintain service ratios as the CPU is built out. The proposed CPU supports the development of a satellite police station on the former Stadium site to serve a future dense, active area. Additional stations may be required to serve the buildout population, although actual needs and potential locations would be determined in the future as development occurs. The proposed CPU contains policies that support identifying funding to develop and upgrade these facilities. Notwithstanding future requirements, impacts associated with physical impacts that could result from the need for new facilities and services would be significant and unavoidable.
- C9-9 As discussed in PEIR Chapter 4.11, according to the San Diego Unified School District (SDUSD), the potential increase in students from implementation of the proposed CPU would likely impact district facilities to the point of reaching capacity. To ensure that school space is available for future residential growth, SDUSD may undertake a number of potential measures, including reducing the number of non-resident students or adjusting attendance boundaries. However, as a program-level document, the PEIR cannot adequately anticipate specific requirements related to schools. Furthermore, as development proceeds, each project will be required to pay applicable school fees which would mitigate potential impacts related to school services and capacity. Proposed mobility improvements within the CPU would support enhanced safety for pedestrians and would support safe routes to schools. VMT and emissions associated with school busing is outside the scope of this PEIR.

C10 Richard Manley

- C10-1 Refer to response to comment C9-1.
- C10-2 Refer to response to comment C9-2.

C10-3 Refer to response to comment C9-2.

C10-4 Refer to response to comment C9-3.

C10-5 Refer to response to comment C9-4.

C10-6 Refer to response to comment C9-5.

C10-7 Refer to response to comment C9-6.

C10-8 Refer to response to comment C9-7.

C10-9 Refer to response to comment C9-8.

C10-10 Refer to response to comment C9-9

3 Revisions to the Draft PEIR

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

3.1 Errata

In addition to in-line revisions shown in the revised Draft PEIR, the following figure changes have been made.

REVISION TO THE PROJECT BOUNDARY

The Mission Valley CPU area boundary used in the Draft PEIR has since been revised to correct a mapping error. The boundary previously included a 5-acre freeway interchange south of Sefton Field that is part of the Old Town Community Plan Area. All figures in the Final PEIR have been revised to reflect that this interchange is not part of the Mission Valley Community Plan Area. Additionally, the far eastern edge of the CPU area boundary was minimally adjusted. Note that where the Draft PEIR stated the total acreage of the CPU area to be 3,216, the acreage of the revised CPU area is 3,211. The Draft PEIR CPU area boundary is shown in Figure 3-1.

ZONING FIGURES

The revised Chapter 3: Project Description includes two new figures. Figure 3.3-2 shows existing zoning the CPU area and Figure 3.3-3 shows proposed zoning under the proposed CPU.

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Figure 3-1: Draft PEIR CPU Area Boundary



- Trolley Stops
- Light Rail
- Freeways
- Ramps
- Streams/Creeks
- Lakes/Ponds/Bays
- Parks
- Mission Valley Community Plan Boundary
- Community Planning Areas

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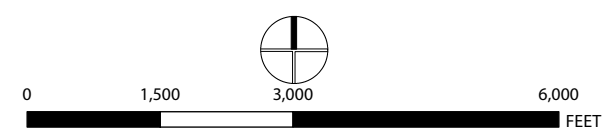
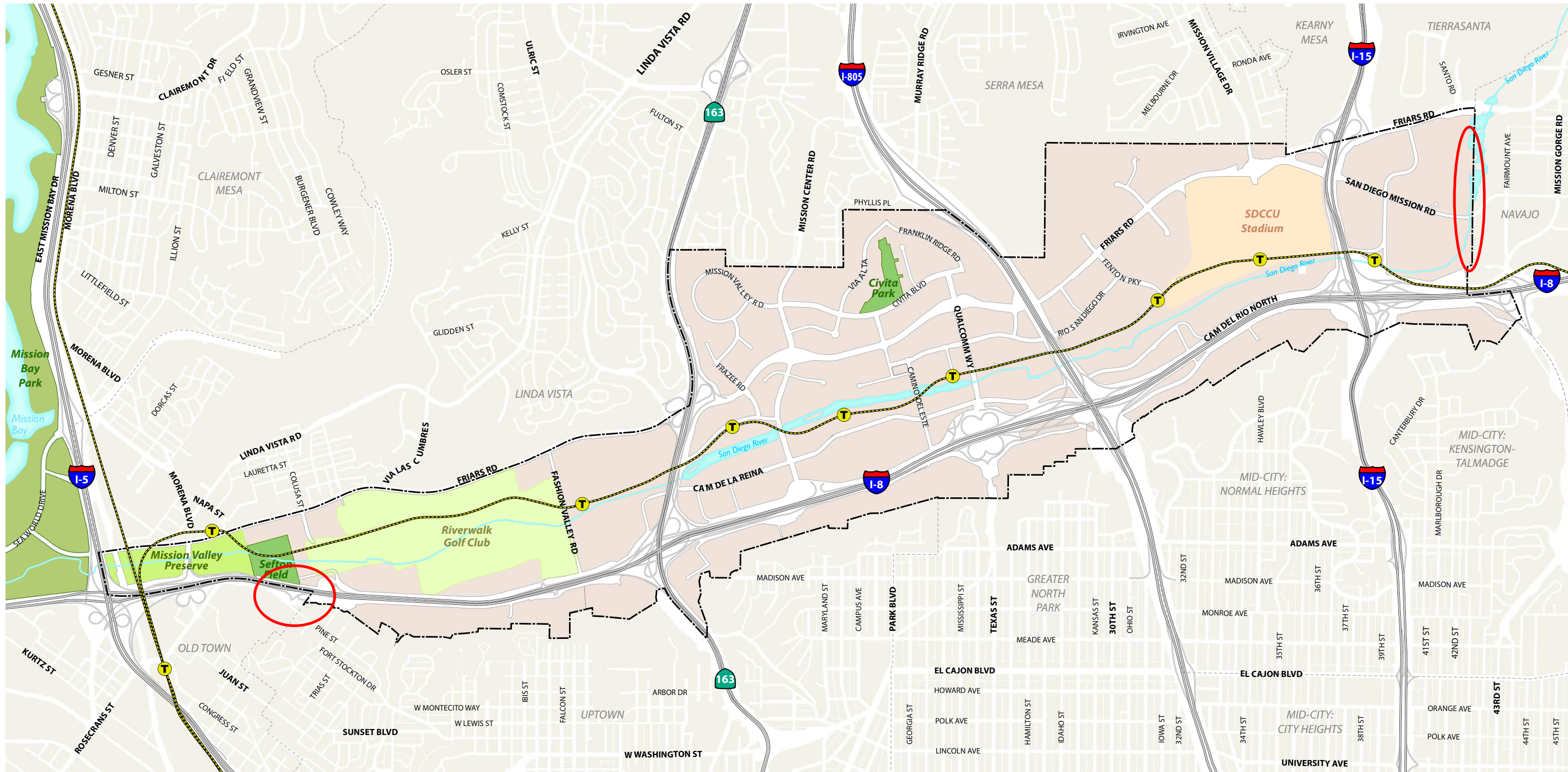


Figure 3-2: Revised PEIR CPU Area Boundary



- Trolley Stops
- Light Rail
- Freeways
- Ramps
- Streams/Creeks
- Lakes/Ponds/Bays
- Parks
- Mission Valley Community Plan Boundary
- Community Planning Areas

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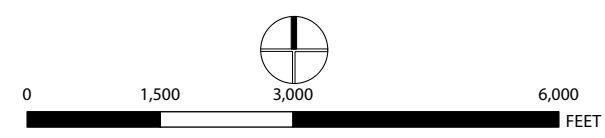


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Executive Summary

This Program Environmental Impact Report (PEIR) for the proposed Mission Valley Community Plan Update and associated discretionary actions (collectively referred to throughout this PEIR as the “proposed CPU”) has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000 et seq.) and in accordance with the City’s 2016 CEQA Significance Determination Thresholds. The City of San Diego is the lead agency responsible for ensuring that the proposed CPU complies with CEQA. The “lead agency” is defined by PRC Section 21067 as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”

The proposed CPU includes a number of legislative actions to be considered by the City Council, but primarily is a comprehensive update of the 1985 Mission Valley Community Plan. The proposed CPU reflects citywide policies and programs developed in the 2008 City of San Diego General Plan.

A PEIR is intended to inform decision-makers and the general public of the potential significant environmental impacts of a proposed project. The PEIR also considers the availability of mitigation measures to minimize significant impacts and evaluates reasonable alternatives to the proposed CPU that may reduce or avoid one or more significant environmental effects.

ES.1 Proposed Project

ES.1.1 PLANNING AREA

The Mission Valley Community Plan area is located in the geographic center of the City of San Diego. The CPU area is surrounded by several other Community Plan areas: Old Town San Diego, Uptown, Greater Northern Park, Normal Heights, Kensington-Talmadge, College Area, Navajo, Tierrasanta, Kearny Mesa, Serra Mesa, Linda Vista, and Mission Bay Park.

The CPU area encompasses roughly 3,216 acres of land. The CPU area is urbanized and generally characterized as a mix of commercial and residential uses, with significant recreational and open space acreage. The CPU area is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and Interstate (I-) 5 on the west.

The San Diego River, which runs westward through Mission Valley, is a significant asset and defining feature of the community. The valley sits at the crossroads of the regional freeway system, enjoying access from I-5, I-8, I-15, I-805 and State Route (SR-) 163.

ES.1.2 PROJECT DESCRIPTION

The proposed CPU is a comprehensive update to the Mission Valley Community Plan, adopted in 1985. The adopted Community Plan has undergone over 20 amendments in the intervening years and was last amended in 2013. The proposed CPU provides detailed, community-specific policy direction to guide development in Mission Valley and brings the Community Plan up to date by analyzing current land use, development, and environmental characteristics; evaluating changes in demographics; understanding the demand for housing and commercial development; working with community members to establish a vision and objectives; evaluating the “fit” of current Community Plan policies to achieve community goals and regulatory requirements; and ensuring policies and recommendations remain in harmony with the General Plan, citywide, and regional policies.

The proposed CPU’s implementation requires adoption of the proposed Mission Valley Community Plan, and other associated discretionary actions, including amendments to the General Plan to incorporate the proposed CPU as a component of the General Plan Land Use Element, amendments to the San Diego Municipal Code and Official Zoning Map to be consistent with the proposed CPU, amendments to existing development agreements; and updates and amendments to other plans and regulatory documents including but not limited to, SANDAG’s Regional Plan, the City’s Pedestrian Master Plan, the City’s Bicycle Master Plan, the City’s Traffic Signal Communications Master Plan, and the Urban Water Management Plan.

The intent of the proposed CPU is for Mission Valley be a vibrant community, renowned for its walk- and bike-ability, accessibility to interstates and transit, recreational and employment opportunities, and a concentration of diverse food and unique shopping. New and creative housing opportunities are envisioned to be a defining feature of a future Mission Valley. Existing sites are re-envisioned to better integrate housing into the area, with a balance between housing, employment, and shopping opportunities. The community’s San Diego River Trail and pedestrian paseos will join with green streets and community parks. New connections and a strengthened grid will improve vehicular mobility, and present and future trolley lines will support easy commuting and transit-oriented development.

The proposed CPU envisions the following major changes related to the community’s vision for specific portions of the CPU area:

- **Western Mission Valley.** To acquire a residential and park focus with complementing office and retail uses.
- **South of I-8.** To be enhanced through higher quality building materials, new opportunities for regional retail development, and restoration of the landscape.

- **The Stadium Site.** Redevelopment to occur through a future ~~Specific Plan or Campus Master Plan, which would use the content requirements of a Specific Plan prepared pursuant to California Government Code Section 65451(a).~~¹
- **Central Mission Valley.** To become an active, mixed-use urban hub and central business district.
- **Eastern Mission Valley.** To support higher density residential development with enhanced multi-modal connectivity.

ES.2 Project Objectives

In accordance with CEQA Guidelines Section 15124(b), the following objectives have been identified to outline the underlying purpose for the proposed CPU. These objectives assisted the City as the lead agency in developing a reasonable range of alternatives to evaluate in this Draft PEIR and will ultimately aid in preparing findings and overriding considerations, if necessary. The primary objectives for the proposed CPU are to:

- Establish a sustainable, walkable community with enriched pedestrian spaces including linear parks and nodes of pedestrian-scale, visually stimulating development that support a mix of uses;
- Establish a strengthened grid system that supports local and regional roadway network efficiency, with a finer grain of streets that provide a second layer of neighborhood mobility more suitable to pedestrian and daily community trips;
- Accommodate new roadway connections within developed areas or areas planned for development for improved connectivity and adequate emergency access and response;
- Provide housing and employment opportunities in close proximity to transit;
- Meet the City's Climate Action Plan (CAP) goals;
- Create a branching park and pedestrian pathway system with the San Diego River as the backbone and organizing framework;
- Establish usable public spaces that provide amenities for recreation and relaxation for community enjoyment;
- Encourage architecture that is distinctive and memorable, with attention paid to building quality, materials, details, and amenities that give back to the community; and
- Enhance and maintain the hillsides that form the edges of the valley.

1. The proposed CPU assumed that 4,800 dwelling units, two million square feet of office space, 300,000 square feet of retail space, 450 hotel rooms, 38.1 acres of active park, ~~and~~ 4.9 acres of open space, and a 40,000-seat stadium would be developed on the Stadium site. The future Specific Plan for the Stadium site will provide more site-specific development details.

ES.3 Areas of Controversy

Environmental impacts classified as significant and unavoidable that may generate controversy have been identified in the resource topics of air quality; historical, cultural, and tribal resources; hydrology and water quality; noise; public services and facilities; public utilities and infrastructure; and transportation inasmuch as they may be controversial to the general public, agencies, or stakeholders. Table ES-1 lists significant and unavoidable impacts, summarizes the results of the impact analysis, and lists applicable mitigation measures.

ES.4 Project Alternatives

To fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed CPU be analyzed. Section 15126.6 of the State CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

Alternatives to the proposed CPU are evaluated in Chapter 6 of this PEIR. The evaluations analyze the ability of each alternative to further reduce or avoid the significant environmental effects of the proposed CPU. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates three alternatives to the project: the No Project Alternative (continuation of the adopted Community Plan), Alternative 1: No new roadway extensions of Riverwalk Street “J” or Fenton Parkway over the San Diego River, and Alternative 2: Via Las Cumbres 2-Lane Roadway connection over the San Diego River.

ES.1.3 NO PROJECT ALTERNATIVE

The purpose of evaluating the No Project Alternative is to allow decision-makers to compare the potential impacts of approving the proposed CPU with the potential impacts of not approving the proposed CPU. The No Project Alternative analysis represents what would be reasonably expected to occur in the foreseeable future if the proposed CPU were not approved.

Under the No Project Alternative, the existing 1985 Mission Valley Community Plan would continue to guide development and would include land use designations as they apply today, including all amendments to the Community Plan from its original adoption in 1985 to its most recent update in 2013. The plan includes goals and actions to improve the transportation system, encourage mixed-use development on large sites, guide urban form and physical development that protects and is responsive to the physical environment, and encourage the development of neighborhood facilities that fulfill the daily needs of local residents.

ES.1.4 ALTERNATIVE 1

Alternative 1 differs from the proposed CPU in that it would not include the proposed Riverwalk Street “J” connection, which would extend from Friars Road to Hotel Circle South, or the extension of Fenton Parkway to Mission City Parkway/Camino Del Rio North. Therefore, there would be no new roadway extensions across the San Diego River. Alternative 1 would include all other policies, land use designations, and mobility improvements included in the proposed CPU. Projected buildout under Alternative 1 would be the same as the projected buildout for the proposed CPU. This alternative was developed to reduce potential impacts related to the construction of the roadway extensions across the river.

ES.1.5 ALTERNATIVE 2

Alternative 2 differs from the proposed CPU in that instead of the two-lane Riverwalk Street “J” connection, the north-south connection would be made 900 feet to the west via a two-lane Via Las Cumbres connection. Like the proposed CPU Riverwalk Street “J” connection, the extension of Via Las Cumbres would include Class II buffered bicycle lanes and a painted median from Friars Road to Riverwalk Street “U” ~~Levi Cushman Street B~~ (with additional lanes at intersections as needed) and would bridge over the San Diego River; plus enhancements to Fashion Valley Road to raise it to the 15-year flood level and widen it to a four-lane major street with Class IV cycle track, which is the same as under the proposed CPU. Differing from the proposed CPU, the profile of this alternative would be much higher, as the Via Las Cumbres extension would be elevated over the MTS trolley track, instead of converting the existing berm into a bridge over Riverwalk Street “J”. For this alternative, the bridge would cross the river further west than under the proposed CPU.

ES.1.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified. Based on a comparison of the alternatives’ overall environmental impacts and their compatibility with the proposed CPU’s goals and objectives, Alternative 1 is the environmentally superior alternative for this PEIR.

While the No Project Alternative would have the least number of significant impacts, per the CEQA Guidelines, another environmentally superior alternative must be identified. Alternative 1 and the proposed CPU would each have the same number of significant impacts, while Alternative 2 would result in greater significant and unavoidable impacts. As Alternative 1 would not include the proposed CPU roadway extensions of Riverwalk Street “J” and Fenton Parkway across the San Diego River, it would result in the following considerations when compared to the proposed CPU:

- Less impacts to biological resources for the Riverwalk Street “J” and Fenton Parkway connections;
- Less potential to impact historical or cultural resources in the vicinity of the river;
- A slightly lower potential for impervious pavement and therefore flooding due to the removal of the proposed river crossings;

- Lower potential for light and glare, as it would not include new street lights along the proposed roadway connections over the San Diego River; and
- Less potential for obstruction of scenic views of the San Diego River.

While implementation of Alternative 1 would result in increased VMT compared to the proposed CPU and, like the proposed CPU, would have significant and unavoidable impacts with regards to air quality; historical, cultural, and tribal cultural resources; hydrology and water quality; noise; public services and facilities; public utilities and infrastructure; and transportation ~~air quality standards and conflicts with applicable air quality plans~~, for the reasons discussed above, Alternative 1 is the environmentally superior alternative.

ES.5 Summary of Significant Impacts and Mitigation Measures that Reduce Impact

Table S-1 summarizes the results of the environmental analysis including the potentially significant environmental impacts of the proposed CPU and proposed mitigation measures to reduce or avoid these impacts. Impacts and mitigation measures are organized by issue in Chapter 4.0, Environmental Analysis. Chapter 4.0 also includes discussions of proposed policies that would reduce identified impacts. Chapter 5.0, CEQA Required Conclusions, includes an analysis of the cumulative impacts of the proposed CPU for each issue.

Pursuant to CEQA Guidelines Section 15126, all components associated with the proposed CPU are considered in this PEIR at the program level when evaluating potential impacts on the environment, including the construction of future development and supporting facilities and utilities. Impacts are identified as direct or indirect, and short-term or long-term, and are assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the proposed CPU compared to existing ground conditions.

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.1 Air Quality			
4.1-1 Would the proposed CPU conflict with or obstruct implementation of the applicable air quality plan?	The proposed CPU would increase residential, commercial, and retail development potential within the CPU area, which would result in greater density. Buildout of the proposed land uses would increase future emissions and therefore would conflict with implementation of the Regional Air Quality Strategy (RAQS) and could have a potentially significant impact on regional air quality. Mitigation Measure MM-AQ-1 would reduce any potential significant impact of the proposed CPU; however, as the effectiveness of this measure cannot be guaranteed at this time, this impact would be significant and unavoidable.	Mitigation Measure MM-AQ-1 as described in 4.1-1 Air Quality	<i>Significant and unavoidable</i>
4.1-2 Would the proposed CPU result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	<p>The exact number and timing of individual development projects that could occur as a result of implementation of the proposed CPU are unknown at this time. Subsequent discretionary development projects would need to analyze specific construction related criteria air pollutant impacts to ensure that emissions remain below the San Diego Air Pollution Control District (SDAPCD) thresholds. However, under the proposed CPU, ministerial projects that would not be subject to CEQA would also occur. Federal, State, and local regulations would provide a framework for developing project-level air quality protection measures for future projects. Due Nevertheless, due to the potential for significant growth in the CPU area, future development could exceed the SDAPCD screening thresholds; therefore, this impact is considered significant and unavoidable.</p> <p>Operational emissions associated with buildout of the proposed CPU would be greater for all pollutants when compared to the adopted land uses and assumptions used to develop the RAQS. Although the City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, there could be projects that would not be able to reduce emissions below the thresholds. Ministerial projects would not be subject to further CEQA review. Therefore Since it is unknown at this time whether</p>	Mitigation Measure MM-AQ-2 as described in 4.1-1 Air Quality	<i>Significant and unavoidable</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	<p><u>new development would be able to reduce emissions below the threshold</u>, this impact would be significant and unavoidable.</p>		
<p>4.1-3 Would the proposed CPU expose sensitive receptors to substantial pollutant concentrations, including toxins?</p>	<p>Implementation of the proposed CPU would not result in any carbon monoxide (CO) hotspots. Exposure of sensitive receptors to diesel particulate matter (DPM) from construction projects would be less than significant as construction activities would occur intermittently and at various locations over the lifetime of the proposed CPU, and DPM is highly dispersive. The proposed CPU policies, implementing actions, and design guidelines support infill, mixed-use, higher density, and transit-oriented development that would benefit regional air quality. Implementation of the proposed CPU would be consistent with the goals of the California Air Resources Board (CARB) handbook and would minimize exposure of sensitive receptors to mobile source emissions. The proposed CPU would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>
<p>4.1-4 Would the proposed CPU create objectionable odors affecting a substantial number of people?</p>	<p>While specific developments within the CPU area are not known at this program level of analysis, proposed land uses would not encourage, or support, uses that would be associated with significant odor generation. As odor generation is generally confined to the immediate vicinity of the source, implementation of the proposed CPU would not create operational-related objectionable odors affecting a substantial number of people. New and existing facilities are required to comply with SDAPCD Rule 51 to prevent nuisances to sensitive land uses. Therefore, impacts related to objectionable odors would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.2 Biological Resources			
<p>4.2-1 Would the proposed CPU result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?</p>	<p>The CPU area contains sensitive upland vegetation communities including coastal sage scrub and disturbed coastal sage scrub (Tier II) and chaparral (Tier IIIA), as well as sensitive plants San Diego ambrosia (<i>Ambrosia pumila</i>) and decumbent goldenbush (<i>Isocoma menziesii</i>). A majority of the sensitive habitats within the CPU area are located within the City’s Multi-Habitat Planning Area (MHPA) and would not be subject to potential impacts associated with future development as limited development is permissible within the MHPA. Future site-specific environmental review and associated compliance with the City’s Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and the provisions of the Multiple Species Conservation Program (MSCP) Subarea Plan including Section 3503 of the California Fish and Game Code are ensured through the requirement for discretionary review for future projects within the designated Community Plan Implementation Overlay Zones (CPIOZ) identified within the CPU area. Potential indirect impacts to sensitive habitats and wildlife species within MHPA would be protected through required implementation of MHPA Land Use Adjacency Guidelines. Impacts to sensitive species would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>
<p>4.2-2 Would the proposed CPU result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development Manual, or</p>	<p>Compliance with the established development standards contained in the City’s ESL Regulations, Biology Guidelines, MSCP Subarea Plan, and MHPA Land Use Adjacency Guidelines would ensure that impacts to sensitive vegetation communities and sensitive plants would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-I: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p>other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?</p>			
<p>4.2-3 Would the proposed CPU result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p>Future development projects would be reviewed on a project-by-project basis to determine if impacts to wetlands would occur. If impacts would occur, projects would be regulated by the U.S. Army Corps of Engineers (USACE) according to Section 404 of the Clean Water Act (CWA), the Regional Water Quality Control Board (RWQCB) in accordance with Section 401 of the CWA, the California Department of Fish and Wildlife (CDFW) under Section 1600 of California Fish and Game Code, and the City in accordance with the Biology Guidelines, the ESL Regulations, and the MSCP Subarea Plan. With implementation of the existing regulatory framework and the proposed supplemental development regulations of the San Diego River CPIOZ, impacts to riparian habitats and wetlands would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>
<p>4.2-4 Would the proposed CPU interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Subarea Plan, or impede</p>	<p>The San Diego River is part of a major wildlife corridor system that allows for wildlife species movement between the Pacific Ocean and inland canyon systems and other major off-site habitat areas. The San Diego River corridor is designated as MHPA, which provides protections from future development. The proposed CPU would not change land uses that would allow development within the San Diego River corridor that could impede wildlife corridors or nursery sites, therefore no impact to wildlife corridors would occur. To avoid impacts on migratory or nesting birds, pre-construction nest survey would be required if construction would occur in potential or known habitat during the typical bird breeding season to ensure that impacts</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
the use of native wildlife nursery sites?	to nesting birds or their eggs, chicks, or nests would be less than significant. No mitigation is required.		
4.2-5 Would the proposed CPU result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region?	The proposed CPU would be generally consistent with existing MHPA preserve areas as existing preserve would remain planned as open space. Minor development within MHPA, such as footings for new pedestrian bridges are a consistent use within the MHPA. Projects that could affect the MHPA would be required to comply with MHPA Land Use Adjacency Guidelines. Implementation of the proposed CPU would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan or local policy protecting biological resources. Therefore, impacts would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.3 Geology, Soils, and Seismicity			
4.3-1 Would the proposed CPU expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?	While the CPU area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, or landslides would be reduced through implementation of site-specific geotechnical requirements through the City of San Diego Municipal Code (SDMC) and the California Building Code (CBC). Adherence to the SDMC, CBC, and other regulatory requirements would reduce impacts related to geologic hazards to an acceptable level of risk and impacts would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.3-2 Would the proposed CPU result in substantial increase in wind or	SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p>water erosion of soils, either on or off the site?</p>	<p>established in the Land Development Manual. Conformance to such mandated City grading requirements would ensure that grading and construction operations for future projects located within the proposed CPU would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions. Thus, impacts would be less than significant, and no mitigation is required.</p>		
<p>4.3-3 Would the proposed CPU be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?</p>	<p>The majority of the CPU is mapped on soils with high potential for liquefaction. While the potential for geologic or soil instability exists in the CPU area, site-specific geotechnical investigations required for future projects would identify any such potential hazards, and provide recommendations to reduce the potential hazards to an acceptable level of risk. Proposed CPU policies and Implementing Actions that address other geologic and seismic hazards would serve to further reduce potential impacts. With adherence to existing SDMC, CBC, and other regulations, and implementation of the proposed CPU, potential impacts associated with expansive soils should be reduced to an acceptable level of risk and impacts would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>
<p>4.3-4 Would the proposed CPU be located on expansive soil, as defined in Table 18-1-B of the</p>	<p>Expansive soils can be found in the CPU area surrounding the San Diego River. While the potential for expansive soils exists in the CPU area, site-specific geotechnical investigations required for future projects should identify expansive soils and recommend measures to mitigate potential impacts. Through compliance with applicable</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
Uniform Building Code (1994)?	regulatory requirements, potential impacts from expansive soils will be reduced and impacts would be less than significant. No mitigation is required.		
4.4 Greenhouse Gas Emissions and Energy			
4.4-1 Would the proposed project CPU generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Greenhouse Gas (GHG) emissions would be greater for the proposed CPU compared to the adopted Community Plan. The increase in emissions would be due to the increased density that would be allowed under the proposed CPU. However, this increase would be a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density along transit corridors and within a TPA would support the City in achieving its GHG emissions reduction targets under the CAP. Therefore, impacts associated with GHG emissions would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.4-2 Would the proposed project CPU conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	The City's Climate Action Plan (CAP) establishes five primary strategies for achieving the citywide CAP goals. The proposed CPU contains policies and design guidelines that are consistent with the CAP and its five primary strategies. The CAP's Monitoring and Reporting Program Measure 1.4 calls for City staff to annually evaluate City policies, plans (including the CAP), and codes as needed to ensure that reduction targets outlined by the CAP are met. The City can therefore amend land use plans or regulations to support more GHG reduction strategies. The proposed CPU would be consistent with and would implement the CAP. Impacts would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.4-3 Would the proposed project CPU develop land uses and patterns that would cause the wasteful, inefficient, and unnecessary consumption of energy or the construction of new or retrofitted buildings that would have excessive energy requirements for daily operation?	Since the proposed project is the adoption of a community plan and does not specifically address any particular development project(s), impacts to energy resources are addressed based on the projected buildout of the proposed CPU. Generally, projected population growth will result in increased development intensity and result in impacts to energy supply. The proposed CPU identifies a number of sustainable design policies that support energy-efficient development and encourage the implementation of sustainable building practices. There are no features of the proposed CPU that would support the excessive use of fuel or other forms of energy during the construction of future projects, nor would it create unnecessary energy waste. Future development implemented under the proposed CPU would be required to meet the mandatory energy requirements of CALGreen and the California Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development. Therefore, long-term operational energy impacts would be less than significant. No mitigation is required.	None Required	Less than significant
4.5 Hazards and Hazardous Materials			
4.5-1 Would the proposed CPU expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	While there is Moderate fire threat throughout the CPU area, implementation of policies and regulations within the General Plan, San Diego Fire Code, San Diego Building Regulations, Off-Site Development Impact Regulations, and Brush Management Regulations, as well as policies within the proposed CPU would serve to reduce the availability of fuels to limit the spread of potential wildfires. Therefore, impacts related to wildfires would be less than significant. No mitigation is required.	None Required	Less than significant

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.5-2 Would the proposed CPU result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	In accordance with City, State, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. For any new schools, it is the responsibility of the school district or private entity to perform an in-depth analysis of any potential hazards at the project level. The proposed CPU also includes policies and implementing actions regarding the management of hazardous waste sites. Through implementation of existing regulations and proposed CPU policies, impacts to schools from hazardous materials, substances, or waste would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.5-3 Would the proposed CPU impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	The land use and circulation changes identified in the proposed CPU would not physically interfere with any known adopted emergency plans. Furthermore, the proposed CPU includes policies and implementing actions to improve the existing transportation infrastructure, which may improve evacuation and emergency response times. Thus, impacts related to emergency plan consistency would be less than significant, and no mitigation is required.	None Required	<i>Less than significant</i>
4.5-4 Would the proposed CPU be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?	According to a search of federal, state, and local regulatory databases, 2,000 documented hazardous material release cases were identified within the proposed CPU area. A final list of 46 sites were selected if they had an unauthorized release of contaminants, were (or had been) under regulatory oversight, and had residual contamination with potential adverse effects in the proposed CPU area. Adherence to existing policies, proposed CPU policies, and federal, state, and local regulations will reduce potential impacts to a less than significant level. No mitigation is required.	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.5-5 Would the proposed CPU expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents?	The CPU <u>area</u> is located in two Airport Influence Area (AIA) review areas. With adherence to existing policies and regulations, compliance with the provisions of the SDIA and Montgomery Field ALUCPs, and implementation of proposed CPU policies, potential hazards from airport operations would be minimized and impacts would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.6 Historical, Cultural, and Tribal Cultural Resources			
4.6-1 Would the proposed CPU result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of an historic building (including an architecturally significant building), structure, object or site?	The CPU area contains known historic resources including resources listed in the NRHP and the San Diego Historical Resources Register. While the SDMC provides for the regulation and protection of both designated and potential historical resources, it is not possible to ensure the successful preservation of all historic resources within the proposed CPU area at a programmatic level. Although the CPU does not propose specific development, future development and related construction activities under the proposed CPU at the project level could result in the alteration of a historic building, structure, object, or site. Mitigation Measure MM-CULT-1 would address potential significant impacts; however, the degree of future impacts and the success of mitigation measures cannot be adequately known for each specific future project at this program level of analysis. This impact would be significant and unavoidable.	Mitigation Measure MM-CULT-1, as described in 4.6-1 Historical, Cultural, and Tribal Cultural Resources	<i>Significant and unavoidable</i>
4.6-2 Would the proposed CPU result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the	The Cultural Resources Constraints Analysis identified 57 recorded archaeological and cultural resources within the proposed CPU area, and much of the area is of moderate or high cultural sensitivity. Future development implemented in accordance with the proposed CPU could result in potential impacts to cultural resources. While existing federal, State, and local regulations, and proposed CPU policies would provide for the regulation and protection of archaeological resources and human remains and avoid potential impacts, these regulations and	Mitigation Measure MM-CULT-2, as described in 4.6-2 Historical, Cultural, and	<i>Significant and unavoidable</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p>disturbance of any human remains, including those interred outside of formal cemeteries?</p>	<p>policies could not guarantee the successful preservation of all archaeological resources, particularly those discovered over the course of future development. While mitigation could reduce the level of significance, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would be minimized but would remain significant and unavoidable.</p>	<p>Tribal Cultural Resources</p>	
<p>4.6-3 Would implementation of the proposed CPU result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, <u>and that is:</u></p> <p>a. <u>Listed or eligible for listing in the California Register of Historical Resources, or in a</u></p>	<p>There is precedent for the potential discovery of tribal cultural resources in the CPU area given the prehistoric and historic activity present in the CPU area, as well as information provided by the Lipay Nation of Santa Ysabel. The proposed CPU includes policies that ensure that project-specific Native American consultation occurs early in the development review process. While existing federal, State, and local regulations, and proposed CPU policies would provide for the regulation and protection of tribal cultural resources and avoid potential impacts, there would be no guarantee that any substantial adverse changes to tribal cultural resources could be avoided. Consultation with culturally affiliated tribal groups is on-going and any additional requirements will be incorporated. While mitigation could reduce the level of significance, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, impacts to tribal cultural resources would be minimized but would remain significant and unavoidable.</p>	<p>Mitigation Measure MM-CULT-2, as described in 4.6-2 Historical, Cultural, and Tribal Cultural Resources</p>	<p><i>Significant and unavoidable</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p><u>local register of historical resources as defined in Public Resources Code Section 5020.1(k), or</u></p> <p><u>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a</u></p>			

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<u>California Native American tribe?</u>			
4.7 Hydrology and Water Quality			
4.7-1 Would the proposed CPU result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?	Flooding sources in the CPU area include local surface runoff from developed areas and riverine flooding from the San Diego River and its tributaries. The majority of the CPU area is developed and highly impervious in the existing condition. Buildout of the proposed CPU would be required to comply with the drainage regulations in the City's Drainage Design Manual and the hydromodification management requirements in the City's Storm Water Standards Manual. Adherence to these regulations and implementation of proposed CPU policies related to storm water runoff would ensure impacts related to local surface runoff are less than significant. Compliance with the City's drainage and floodplain regulations would ensure that riverine flooding impacts are less than significant; however, impacts related to future development located behind the provisionally accredited levees (PALs) would be significant and unavoidable given the level of uncertainty regarding the levees status in the next Flood Insurance Rate Map (FIRM), and there are no mitigation measures available. With continued evaluation of dam stability, compliance with State regulations, and a proposed CPU policy <u>Implementing Action</u> to support ongoing dam maintenance, impacts associated with dam failure would be less than significant. The CPU area is not located within a tsunami inundation zone and seiches pose a minimal threat to the CPU area, therefore, impacts related to seiches and tsunamis would be less than significant. Implementation of design measures related to mud and debris conveyance would ensure impacts associated with mudflows are less than significant.	None Required <u>Feasible</u>	<ul style="list-style-type: none"> • <u>Riverine Flooding:</u> Significant and Unavoidable • <u>Local Surface Runoff, Dam Failure, Other Flood Hazards:</u> Less than significant

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.7-2 Would the proposed CPU result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?	Future development and redevelopment would be subject to current, more stringent storm water regulations, which would ensure water quality would not significantly degrade below current water quality levels. Compliance with storm water best management practices (BMPs) and proposed CPU policies would make impacts to water quality less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.7-3 Would the proposed CPU deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?	The City’s Storm Water Standards Manual establishes guidance on the required water quality improvements for new development and redevelopment projects, including required construction BMPs. The requirements are structured to protect both surface water beneficial uses and groundwater beneficial uses of downstream receiving waters. The proposed CPU does not include or require the extraction of groundwater for purposes of supplying future projects within the CPU area and would therefore not deplete groundwater supplies. Thus, impacts to groundwater supply and quality would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.8 Land Use			
4.8-1 Would the proposed CPU conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an	Land use designations and policies associated with the proposed CPU would be consistent with the SANDAG Regional Plan goals to develop compact, walkable communities close to transit connections and consistent with smart growth principles. This <u>The</u> proposed CPU would also be consistent with and implement the General Plan’s City of Villages Strategy and would retain proposed CPU policies that align closely with General Plan goals for mobility, urban design, public facilities and services, recreation, conservation, and historic preservation. In general, the land use framework of the proposed CPU would accommodate the development proposed in the CPU area’s	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
indirect or secondary environmental impact?	Specific Plans, but would require amendments to the San Diego Municipal Code. The proposed CPU would not conflict with the environmental goals, objectives, or guidelines of applicable land use plans and therefore would have a less than significant impact. No mitigation is required.		
4.8-2 Would the proposed CPU lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	Implementation of the proposed CPU would not change the proportion of parks and open space/undevelopable areas within the CPU area and would include provisions to promote the creation of public parks and open spaces and the integration of new development with existing parks and open spaces. Therefore, there would be a less than significant impact related to the conversion of on open space or farmland. No mitigation is required.	None Required	<i>Less than significant</i>
4.8-3 Would the proposed CPU conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	Proposed CPU policies and actions do not conflict with the provisions of the City's MSCP Subarea Plan or other habitat conservation plans and would support the implementation of applicable requirements of the ESL Regulations, Biology Guidelines, and the MSCP Subarea Plan for the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources. Impacts would be less than significant; no mitigation is required.	None Required	<i>Less than significant</i>
4.8-4 Would the proposed CPU result in land uses which are not compatible with an adopted Airport Land	Future development under the proposed CPU would be subject to the requirements of the adopted ALUCPs for SDIA and Montgomery Field, the SDMC, and associated FAA requirements. Therefore, impacts related to conflicts with an adopted ALUCP would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
Use Compatibility Plan (ALUCP)?			
4.9 Noise			
4.9-1 Would the proposed CPU result in or create a significant increase in the existing ambient noise level?	Future development implemented under the proposed CPU could increase traffic noise along local roadways due to increased density and intensity of use. A significant impact would occur if buildout of the proposed CPU would result in traffic noise levels that exceed the City's significance thresholds. While some projects may adequately attenuate exterior noise, there could still be new noise sensitive land uses located in areas that would experience a significant increase in ambient noise levels exceeding the applicable Land Use-Noise Compatibility Guidelines, and therefore impacts would be significant and unavoidable.	None Feasible	<i>Significant and unavoidable</i>
4.9-2 Would the proposed CPU expose people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?	While some projects may adequately attenuate exterior noise, there could still be new noise sensitive land uses that would experience ambient noise levels that exceed the applicable Land Use – Noise Compatibility Guidelines. Therefore, impacts would be significant and unavoidable.	None Feasible	<i>Significant and unavoidable</i>
4.9-3 Would the proposed CPU result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?	No portion of the CPU area is located within the 60 CNEL noise contours of San Diego International Airport (SDIA) and Montgomery Field. Therefore, impacts would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p>4.9-4 Would the proposed CPU result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?</p>	<p>Implementation of the proposed CPU would promote pedestrian-oriented mixed-use areas and residential uses that would be located in proximity to commercial sites and could result in the exposure to additional noise. Land uses proposed by the CPU would be similar to lands uses that currently exist in the CPU area, although with greater density. Since noise levels in the CPU area are dominated by vehicle traffic on freeways and heavily traveled area roadways, noise levels from stationary sources within the CPU area would not be expected to increase the hourly or daily average sound level with respect to current conditions. Through enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts would be less than significant. No mitigation is required.</p>	<p>None Required</p>	<p><i>Less than significant</i></p>
<p>4.9-5 Would the proposed CPU result in the exposure of people to significant temporary construction noise?</p>	<p>The City regulates construction noise through its Noise Abatement and Control Ordinance, which puts limits on the days of the week and hours of operation allowed for construction. Due to the highly developed nature of the CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive receptors to significant noise levels. Mitigation Measure MM-NOS-1 would help reduce construction-related noise impacts for future discretionary projects implemented under the proposed CPU. For ministerial projects, there is no procedure to ensure that construction-related noise impacts are mitigated. Even with implementation of MM-NOS-1, significant construction noise impacts may still occur <u>because it is not feasible to ensure and enforce implementation for all projects developed per the proposed CPU.</u> therefore <u>Therefore</u>, this impact would be significant and unavoidable.</p>	<p>Mitigation Measure MM-NOS-1, as described in 4.9-5 Noise</p>	<p><i>Significant and unavoidable</i></p>

Table ES-I: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.9-6 Would the proposed CPU result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Potential sources of ground-borne vibration could occur as a result of railway operations. Portions of the Green Line Trolley tracks are on elevated structures and do not cause significant vibration impacts to adjacent development. Areas where noise- and vibration-sensitive uses are located the closest to the tracks (as close as 25 feet) are at the existing trolley stations. Because all trolleys stop at each station, trolley speeds approaching and departing from the stations would be very low and would not cause significant vibration levels over existing levels. The future Purple Line Trolley would run through the Stadium Specific Plan area. The exact alignment is not known at this time; however, vibration impacts and screening distances for the Purple Line Trolley are anticipated to be the same as those for the Green Line Trolley. Impacts would be less than significant. No mitigation is required.	None Required	Less than significant
4.10 Paleontological Resources			
4.10-1 Would the proposed CPU result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?	There are five geologic formations that underlay the CPU area and are considered to be of high sensitivity for paleontological resources. Implementation of future development projects under the proposed CPU would involve excavation into these underlying geological formations and could expose these formations and associated fossil remains. While much of the CPU area is underlain by artificial fill with no potential to uncover paleontological resources, the above-mentioned geologic formations have high resource sensitivity and fossils could be uncovered during future construction-related activities. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC, would ensure that impacts to paleontological resources would be less than significant. No mitigation is required.	None Required	Less than significant

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
4.11 Public Services and Facilities			
<p>4.11-1 Would the proposed CPU promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, schools, libraries, and parks or other recreational facilities), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?</p>	<p>Implementation of the proposed CPU would result in an increase in overall population, which could require the Police and Fire-Rescue Department to expand and construct new facilities. Any future construction of police or fire service facilities would be subject to a separate environmental review at the time design plans are available. The proposed CPU contains policies and implementation actions aimed at reducing potential negative environmental impacts resulting from the construction of police and fire stations. Other proposed CPU policies and implementation actions aim to modernize facilities and equipment to ensure that rights-of-way do not impede access for emergency responders. While the City would collect fees from future development to fund police and fire stations, and the proposed CPU contains policies that support identifying funding to develop and upgrade these facilities, this impact would be significant and unavoidable since impacts associated with the construction and operation of future facilities are not known at this time.</p> <p>Under the proposed CPU, residential population growth would generate an elementary school population that would exceed the existing elementary school capacity, while the estimated middle and high school populations could be accommodated by existing facilities. To ensure that school space is available for future residential growth, SDUSD may undertake a number of potential measures, including a reduction in the number of non-resident students or adjustments to attendance boundaries. Under SB 50 (Chapter 407, Statutes of 1998), a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities. While SDUSD would collect fees from future development to fund school facilities, if needed, this impact would be significant and unavoidable since impacts associated with the construction and operation of any future facility are not known at this time.</p>	<p>None Feasible</p>	<p><i>Significant and unavoidable</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	<p>The proposed CPU does not include construction of new library facilities. Implementation of the proposed CPU could result in additional residents and associated demand for library services. If implementation of the proposed CPU results in the need for new or expanded library facilities, existing development regulations would serve to reduce potential environmental impacts associated with construction. Future projects would be subject to a separate environmental review at the time design plans are available. Nevertheless, this impact would be significant and unavoidable since impacts associated with the construction and operation of future facilities are not known at this time.</p> <p>The proposed CPU includes policies to develop new parks and recreation facilities in the CPU area. There may be a need for additional parkland to serve the community at buildout of the CPU, which may be attained through parkland included in new developments or park equivalencies as provided for through CPU policies. As new recreational facilities are sited, designed, and constructed, existing regulations would serve to reduce potential construction impacts. In addition, future projects would be subject to a separate environmental review at the time design plans are available. Nevertheless, this impact would be significant and unavoidable since impacts associated with the construction and operation of any future park facilities are not known at this time.</p>		
4.12 Public Utilities and Infrastructure			
<p>4.12-1 Would the proposed CPU use excessive amounts of water beyond projected available supplies?</p>	<p>The proposed CPU projections are consistent with water demand assumptions included in the regional water resource planning documents of the San Diego County Water Authority and Metropolitan Water District (MWD). Current and future water supplies, as well as actions necessary to develop those supplies, have been identified in water resources planning documents, in addition to existing and planned future water demand forecasted by the City's</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	Public Utilities Department (PUD). Impacts related to water supply are less than significant. No mitigation is required.		
4.12-2 Would the proposed CPU promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts, in order to maintain service ratios or other performance objectives?	The City's existing built areas are currently served by storm water, wastewater, potable water distribution, and communications systems infrastructure. However, some areas within the CPU area have existing infrastructure deficiencies and may require capacity improvements. No new storm water drains or drainage facilities, sewer collection or wastewater treatment facilities, water distribution/treatment facilities, or communications systems infrastructure are proposed and project-level review for future facilities would be required since details are not currently known. Future development must comply with the City's Storm Water Standards, Sewer Design Guide, SDMC, and other local regulations. Nevertheless, this impact would be significant and unavoidable since impacts associated with the construction of these facilities is unknown.	None Feasible	<i>Significant and unavoidable</i>
4.12-3 Would the proposed CPU result in impacts to solid waste management resulting in the need for construction of new solid waste infrastructure, including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75-percent target for waste diversion, as required	While some land uses would decrease under the proposed CPU, increases in certain types and amounts of other land uses would cause an overall net increase in solid waste generation. Landfills currently serving the CPU area and the City of San Diego have sufficient remaining capacity to handle the increase in solid waste generation resulting from implementation of the proposed CPU. Furthermore, future projects that would occur in the CPU area are required to comply with existing City regulations regarding solid waste management. Impacts on solid waste management would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
<p>under AB 341 and the City's Climate Action Plan?</p>			
4.13 Transportation			
<p>4.13-1 Would the proposed CPU result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?</p>	<p>To provide better connectivity throughout Mission Valley and provide additional access to potential new developments within existing “super blocks,” the proposed CPU roadway network modifications would be designed in accordance with the City of San Diego Street Design Manual and their corresponding classification. All future community conditions were developed based on the project land use and network assumptions within the study area superimposed on the SANDAG 2050 Series 13 Traffic Forecast Model. The project would have significant cumulative impacts on roadway segments and intersections listed in Impact 4.13-1 Traffic Circulation.</p> <p>While Mitigation Measures MM-TR-1 through MM-TR-41 would reduce potentially significant impacts to roadway segments and intersections if implemented, none of the measures are proposed to be included within the proposed CPU because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU mobility vision and other proposed CPU and General Plan goals and policies regarding walkability and bicycling, and were therefore determined not to be appropriate for the roadway network. Therefore, these impacts would remain significant and unavoidable.</p> <p>Mitigation Measures MM-TR-42 through MM-TR-62 are identified for impacts to freeways and onramps. The improvements identified in SANDAG’s Regional Plan (2015) would improve operations along the freeway segments and ramps; however, there is insufficient information regarding the improvements and future developments’</p>	<p>Mitigation Measures MM-TR-1-63 and through MM-TR-64, as described in 4.13-1 Transportation</p>	<p><i>Significant and unavoidable</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	<p>project-level impacts to allow the City to include such improvements within the proposed CPU to form the basis for a fair share mitigation fee for future development at this time.</p> <p>The City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development proceeds, to potentially develop “fair share” mitigation strategies for freeway impacts, as appropriate. MM-TR-63 and MM-TR-64 encourage this inter-agency coordination. However, these impacts would remain significant and unavoidable.</p>		
<p>4.13-2 Would the proposed CPU conflict with adopted policies, plans, or programs supporting alternative transportation?</p>	<p>The proposed CPU would be consistent with the adopted policies, plans, or programs that support alternative transportation and improvements to pedestrian, bicycle, and transit facilities. These improvements include enhancements to pedestrian travel within the CPU area such as implementing the multi-use urban path system, constructing sidewalk and intersection improvements, and installing missing sidewalks and curb ramps. The IFS for the proposed CPU will also include planned pedestrian improvements to install curb ramps, sidewalks, and audible pedestrian signals to meet ADA standards. Implementation of the proposed CPU would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, impacts would be less than significant. No mitigation is required.</p>	<p>None required</p>	<p><i>Less than significant</i></p>
4.14 Visual Effects and Neighborhood Character			
<p>4.14-1 Would the proposed CPU result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?</p>	<p>Implementation of the proposed CPU would not result in a substantial alteration or blockage of public views from critical view corridors, designated open space areas, public roads, or public parks; new development within the community would take place within the constraints of the existing urban framework and development pattern. Thus, future development would not impact view corridors or</p>	<p>None Required</p>	<p><i>Less than significant</i></p>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	viewsheds as viewed from identified public vantage points. Impacts would be less than significant. No mitigation is required.		
4.14-2 Would the proposed CPU result in substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area?	Future development projects would be undertaken in accordance with the General Plan, which provides direction on urban design in accordance with a community vision, and the SDMC, which provides development standards by zone. As an amendment to the General Plan, the proposed CPU maintains existing policies and regulations related to bulk, scale, materials, and style. As part of the proposed CPU implementation, the SDMC will be amended to add CPIOZ regulations from the existing Mission Valley Planned District Ordinance (PDO) to provide consistent development standards. Compliance with the General Plan policies and SDMC regulations, and implementation of proposed CPU policies would ensure new development would be consistent with or enhance the existing neighborhood character. Impacts related to substantial alterations to the existing or planned character of the area would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.14-3 Would the proposed CPU result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?	No distinctive or landmark trees or mature stands of trees have been designated in the CPU area. Adherence to the regulations in the Hillside Conservation, Design, and Height Limitation CPIOZ and the San Diego River CPIOZ regarding the preservation and use of trees, and implementation of proposed CPU policies supporting the incorporation of trees would ensure that impacts are less than significant. No mitigation is required.	None Required	<i>Less than significant</i>
4.14-4 Would the proposed CPU result in a substantial change in the existing landform?	The proposed CPU would entail intensification of uses on the northern and southern hillsides of the CPU area. Through adherence to regulations in the San Diego River CPIOZ; the Hillside Conservation, Design, and Height Limitation CPIOZ; and the SDMC; and through implementation of proposed CPU policies, impacts to the landform	None Required	<i>Less than significant</i>

Table ES-1: Summary of Significant Environmental Impacts

<i>Impact</i>	<i>Results of Impact Analysis</i>	<i>Mitigation</i>	<i>Impact Level after Mitigation</i>
	from future development would be less than significant. No mitigation is required.		
4.14-5 Would the proposed CPU create substantial light or glare which would adversely affect daytime and nighttime views in the area?	Future development implemented in accordance with the proposed CPU would necessitate the use of additional light fixtures and may contribute to existing conditions of light and glare. Glare from new development would be regulated under the SDMC, and lighting impacts to the MHPA that occur adjacent to the CPU area would be addressed through compliance with the MHPA Land Use Adjacency Guidelines. The proposed CPU also includes policies encouraging lighting that is energy efficient and that minimizes light pollution. Therefore, impacts related to light and glare would be less than significant. No mitigation is required.	None Required	<i>Less than significant</i>

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I Introduction

This Program Environmental Impact Report (PEIR) for the proposed Mission Valley Community Plan Update and associated discretionary actions (collectively referred to throughout this PEIR as the “proposed CPU”) has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code [PRC], Section 21000 et seq. and California Code of Regulations [CCR], Title 14, Section 15000 et seq.) and in accordance with the City’s 2016 CEQA Significance Determination Thresholds. The City of San Diego is the lead agency responsible for ensuring that the proposed CPU complies with CEQA. The “lead agency” is defined by PRC Section 21067 as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”

The proposed CPU includes a number of legislative actions to be considered by the City Council, but primarily is a comprehensive update of the 1985 Mission Valley Community Plan. The proposed CPU reflects citywide policies and programs developed in the 2008 City of San Diego General Plan.

1.1 Purpose and Intended Uses

1.1.1 PURPOSE

In accordance with CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant environmental effects of the project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. This PEIR is informational in nature and is intended for use by decision-makers, Responsible or Trustee Agencies as defined under CEQA, other interested agencies or jurisdictions, and the general public. This PEIR contains an analysis of all reasonably foreseeable environmental impacts that would result from implementation of the various policies, land uses, and programs in the proposed CPU, including policies that would serve to avoid or minimize adverse environmental impacts. Where not otherwise included as part of the proposed CPU, this PEIR includes recommended mitigation measures which, if adopted and implemented, would lessen or avoid significant effects of the project on the environment, wherever feasible. In accordance with CEQA, this PEIR also identifies and evaluates alternatives to the proposed CPU, including the No Project Alternative, that could further reduce or avoid significant impacts associated with the project.

1.1.2 INTENDED USES OF THE EIR

CEQA Guidelines Section 15124(d) requires Environmental Impact Reports (EIRs) to identify the agencies that are expected to use the EIR in their decision-making, and the approvals for which the EIR will be used. This PEIR will inform the City, in addition to other Responsible and Trustee Agencies, persons, and the general public, of the potential environmental effects of the proposed CPU and the identified alternatives. The City will use the PEIR as part of its review and approval of the proposed CPU. Other agencies expected to use the PEIR include local and regional agencies such as the County of San Diego, the San Diego Association of Governments (SANDAG), and the San Diego Unified School District (SDUSD); State agencies such as the State Water Resources Control Board and the California Department of Transportation (Caltrans); and resource agencies such as the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW).

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the environmental document for subsequent activities or implementing actions, including future development of public and private projects, to the extent that it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the CPU area, the City finds that no new effects could occur, or no new mitigation measures would be required other than those analyzed and/or required in this PEIR, the City may approve the activity as being within the scope covered by this PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or EIR).

1.2 Legal Authority

1.2.1 LEAD AGENCY

The City of San Diego is the lead agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines Section 15367, is the public agency that has the principal responsibility and authority for carrying out or approving a project. On behalf of the lead agency, the City's Planning Department conducted a preliminary review of the project and decided that an EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

1.2.2 RESPONSIBLE AND TRUSTEE AGENCIES

State law requires that all EIRs be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to CEQA Guidelines Section 15381, includes all public agencies other than the lead agency that have discretionary approval power over the project. A Trustee Agency is defined in CEQA Guidelines Section 15386 as a State agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. Implementation of the proposed CPU would require subsequent actions or consultation from Responsible or Trustee Agencies. A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the project is provided below.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) is responsible for identifying flood hazard areas throughout the United States and its territories by producing Flood Hazard Boundary Maps, Flood Insurance Rate Maps, and Flood Boundary and Floodway Maps. Development permitted under the proposed CPU would be required to be consistent with the conditions of the National Flood Insurance Program (NFIP) per Section 143.0145 of the City of San Diego Municipal Code (SDMC). As a participant in NFIP, the City is required to institute adequate land use and development control measures for preventing and reducing property damage from flooding. In addition, the City ensures that projects within or fringing on a floodway or floodplain comply with FEMA regulations and requirements. Any proposed alterations to FEMA's flood hazard mapping would require FEMA approval.

U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers (USACE) has jurisdiction over development in or affecting the navigable waters of the United States. All permits issued by the USACE are subject to consultation and/or review by USFWS and the U.S. Environmental Protection Agency (USEPA). Drainages occurring within the CPU area may contain streams and wetlands, which may be classified as jurisdictional waters of the United States. No permits from USACE are required at this time; however, future development projects, particularly improvements to infrastructure such as water and sewer lines that could occur with implementation of the proposed CPU, may require review and/or USACE permits in the future.

U.S. Fish and Wildlife Service

Acting under the federal Endangered Species Act, USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, USFWS will provide input to USACE as part of the Federal Clean Water Act (CWA) Section 404 process. The role of USFWS is limited within areas covered by the City's Multiple Species Conservation Program (MSCP) Subarea Plan. For listed species covered by the Subarea Plan, USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, USFWS, and CDFW in 1997. For future projects that are consistent with the City's MSCP, the City has the authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP covered species list, the wildlife agencies retain permit authority. No permits from USFWS are required at this time; however, development projects implemented under the proposed CPU may require review and/or permits in the future.

California Department of Fish and Wildlife

CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to Section 1600 et seq. of the California Fish and Game Code. CDFW generally evaluates information gathered during preparation of the environmental documentation and attempts to satisfy their permit concerns in these documents. Where State-listed threatened or endangered species not covered by the City's MSCP occur on a

project site, CDFW would be responsible for the issuance of a Memorandum of Understanding to ensure the conservation, enhancement, protection, and restoration of State-listed threatened or endangered species and their habitats. No permits from CDFW are required at this time; however, development projects implemented under the proposed CPU may require review and/or permits in the future.

California Department of Transportation

The CPU area is adjacent to Caltrans facilities, including Interstate (I-) 5, I-805, I-15, I-8, and State Route 163 (SR-163). No permits from Caltrans are required at this time; however, Caltrans approval would be required for any encroachments or construction of facilities in a Caltrans right-of-way associated with future projects within the CPU area.

San Diego Regional Water Quality Control Board

The San Diego Regional Water Quality Control Board (RWQCB) regulates water quality through the CWA Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266. The RWQCB is responsible for implementing permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff, including overseeing the development and implementation of Water Quality Improvement Plans as required by the Regional Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region, which includes the City, as well as ensuring that all other MS4 Permit requirements are met. No permits from the RWQCB are required at this time; however, future development projects within the CPU area may require review and/or Section 401 certifications.

San Diego County Regional Airport Authority

The San Diego County Regional Airport Authority (Airport Authority) serves as San Diego County's Airport Land Use Commission (ALUC) and is responsible for land use planning as it relates to public safety surrounding the region's airports. As a Responsible Agency, the Airport Authority, acting as the ALUC, would review future development proposals within the CPU area and make "consistency determinations" with the provisions and policies set forth in the Airport Land Use Compatibility Plans (ALUCPs) for San Diego International Airport (SDIA) and for Montgomery Field up until the time the ALUC determines the proposed CPU and zoning are consistent with the ALUCP for each airport. Future development projects within the CPU area would be subject to the noise, safety, overflight, and airspace protection policies in the ALUCP for the two airports, which also include the Code of Federal Regulations, Part 77 requirement to provide notification to the Federal Aviation Administration as addressed in the ALUCPs for the airports.

1.3 Approach and Scope of the EIR

1.3.1 TYPE OF EIR

This PEIR is a Program EIR as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR examines the environmental impacts of the proposed CPU, which comprise a series of actions which can be characterized as one large project through reasons of geography, similar rules or regulations, or where individual activities will occur under the same regulatory process with similar environmental impacts that can be mitigated in similar ways.

The preparation of this PEIR does not relieve the sponsors of specific projects from the responsibility of complying with the requirements of CEQA (and/or the National Environmental Protection Act for projects requiring federal funding or approvals). The lead agency responsible for reviewing these projects shall determine the level of review needed, and the scope of that analysis will depend on the specifics of the particular project.

1.3.2 PEIR SCOPE AND CONTENT

The City determined the scope of analysis for this PEIR as a result of initial project review, as well as consideration of comments received in response to the Notice of Preparation (NOP) circulated July 28, 2017, and a Scoping Meeting held on August 12, 2017. The NOP for the analysis of the proposed CPU, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. Through these scoping activities, the proposed CPU was determined to have the potential to result in significant environmental impacts related to the following subject areas:

- Air Quality
- Biological Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions and Energy
- Hazards and Hazardous Materials
- Historical, Cultural, and Tribal Cultural Resources
- Hydrology and Water Quality
- Land Use
- Noise
- Paleontological Resources
- Public Services and Facilities
- Public Utilities and Infrastructure
- Transportation
- Visual Effects and Neighborhood Character

The intent of this PEIR is to determine whether implementation of the proposed CPU would have a significant effect on the environment through analysis of each issue identified above. PEIR Sections 4.1 through 4.14 include the environmental analysis for the proposed CPU.

Pursuant to CEQA Guidelines Section 15126, all phases, or in the case of this proposed CPU, all discretionary actions associated with the proposed CPU, are considered at the program level in this PEIR when evaluating potential impacts on the environment, including the construction of future

development and supporting facilities and infrastructure. Impacts are identified as direct or indirect, and short-term or long-term, and are analyzed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the proposed CPU compared to existing conditions on the ground. In some cases, the proposed CPU is also compared with the existing Community Plan to provide context and background for the analysis; however, any impacts identified are impacts that would result from implementation of the proposed CPU compared to existing conditions.

Base Year and Planning Horizon

For analytic purposes in this PEIR, the base year is 2018 unless otherwise noted, and the horizon year representing future buildout conditions under the proposed CPU is 2050. In cases where current data is not available, the most recent known data is used to depict existing conditions. The horizon year of 2050 represents the target year of the proposed CPU when projects and programs are anticipated to be fully implemented. In reality, full implementation of the proposed CPU may take more or less than 30 years.

CEQA Required Conclusions and Alternatives

The PEIR includes all mandatory contents of EIRs as required pursuant to CEQA Guidelines Sections 15120 through 15132. Chapter 5: CEQA Required Conclusions includes discussions regarding cumulative impacts, growth-inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant. Chapter 6: Alternatives Analysis includes a discussion of alternatives that could avoid or reduce potentially significant environmental effects associated with implementation of the proposed CPU. Alternatives discussed in the PEIR include the No Project Alternative, Alternative 1: No new roadway extensions of Street “J” or Fenton Parkway over the San Diego River, and Alternative 2: Via Las Cumbres 2-Lane Roadway connection over the San Diego River. For the purposes of this PEIR, the No Project Alternative would be the continued implementation of the adopted Mission Valley Community Plan.

1.3.3 PEIR FORMAT

A brief overview of the various chapters of this PEIR is provided below.

- ES. **Executive Summary.** Summarizes the PEIR by providing an overview of the proposed CPU, the potentially significant environmental impacts that could result from the proposed CPU, the mitigation measures identified to reduce or avoid these impacts, alternatives to the proposed CPU, and identification of the environmentally superior alternative.
- 1. **Introduction.** Contains an overview of the legal authority, introduces the purpose for the PEIR, explains the PEIR process and intended uses of the PEIR, and describes the overall organization of this PEIR.
- 2. **Environmental Setting.** Provides a description of the proposed CPU’s regional context, location, and existing physical characteristics and land use within the CPU area. More detailed descriptions of the environmental context pertaining to specific environmental topics are provided in each section of Chapter 4: Environmental Analysis.

3. **Project Description.** Describes in detail the proposed CPU, including the CPU area location and planning boundaries, purpose and objectives of the proposed CPU, potential buildout under the proposed CPU land uses, and implementation of the proposed CPU's land use map and policies.
4. **Environmental Analysis.** Analyzes the environmental impacts of the proposed CPU. Impacts are organized by topic area. Each topic area includes a description of the environmental setting, significance criteria, methodology and potential impacts. Where detailed settings have been documented in technical reports completed for the proposed CPU, the relevant Environmental Analysis sections reference the appropriate technical report in the appendices of this PEIR rather than repeat them within the section.
5. **CEQA Required Conclusions.** Summarizes significant environmental impacts, including cumulative impacts, growth-inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant.
6. **Alternatives Analysis.** Presents a reasonable range of alternatives to the proposed CPU, provides a discussion of the environmental impacts associated with each alternative, compares the relative impacts of each alternative to those of the proposed CPU and other alternatives, discusses the relationship of each alternative to the proposed CPU's objectives, and identifies the environmentally superior alternative.
7. **References.** Lists documents and other information sources used in the preparation of the PEIR.
8. **List of Preparers.** Identifies the persons and organizations that contributed to the PEIR.
9. **Appendices.** Appendices to this PEIR include technical information referenced in the Environmental Analysis section as well as supplemental materials such as the NOP and tribal communications.

1.3.4 INCORPORATION BY REFERENCE

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this PEIR and their relationship to this PEIR is described. These documents listed in Chapter 7: References, are hereby incorporated by reference, and are available for review at the City's Planning Department, located at 9485 Aero Drive, M.S. 413, San Diego, CA 92123. Included within the list of materials incorporated by reference into this PEIR are the following:

- City of San Diego General Plan (City of San Diego, 2008)
- City of San Diego Program Environmental Impact Report for the General Plan (Final PEIR) (City of San Diego, 2007)
- City of San Diego Housing Element FY2013-FY2020 (City of San Diego, 2013a)
- City of San Diego San Diego River Park Master Plan (City of San Diego, 2013b)
- City of San Diego Municipal Code (City of San Diego, 2008b)
- City of San Diego Climate Action Plan (City of San Diego, 2015)

- City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego, 1997)

1.4 PEIR Process

1.4.1 NOTICE OF PREPARATION AND PUBLIC PARTICIPATION

The NOP for the PEIR was submitted to the State Clearinghouse on July 28, 2017 and circulated among relevant State and local agencies, as well as to members of the public. The City received comments during a 30-day review period, which ended on August 27, 2017. The NOP and comments received on the NOP are included as Appendix A of this PEIR. A Scoping Meeting was held on August 12, 2017, in the former Bath and Body Works across from Ruby's Diner at the Westfield Mission Valley Mall located at 1640 Camino Del Rio North, San Diego, CA 92108, to receive comments and suggestions on the scope and content for the PEIR; solicit input on potential impacts, mitigation measures, and alternatives to consider; and consult with public agencies responsible for natural resources, other regulatory bodies, neighboring communities, Native American tribes, and members of the public.

1.4.2 PEIR PREPARATION

The City, as lead agency, is responsible for the preparation and review of this PEIR. The EIR process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to comment on the document, and the second stage is the Final EIR.

Draft EIR

In accordance with SDMC Section 128.0306 and CEQA Guidelines Section 15105, the Draft PEIR shall be distributed for review to the public and interested and affected agencies for a review period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated" (CEQA Guidelines Section 15204). SDMC Section 128.0307 allows the Planning Director to approve requests for additional public review time from the affected officially recognized community planning group, in this case the Mission Valley Community Planning Group. Approval of additional review time shall not exceed 14 calendar days.

The Draft PEIR and all related technical studies are available for review during the public review period at the office of the Planning Department, located at 9485 Aero Drive, M.S. 413, San Diego, CA 92123, and on the Planning Department's CEQA Policy and Review webpage:

<https://www.sandiego.gov/planning/programs/ceqa>

Copies of the of the Notice of Availability of the Draft PEIR are also available at public libraries in the City, as listed in Table 1.4-1.

Table 1.4-1 List of Libraries for Distribution of the Draft PEIR

<i>Branch Name</i>	<i>Location</i>
Central Library	330 Park Boulevard, San Diego, CA 92101
Mission Valley	2123 Fenton Parkway, San Diego, CA 92108
Mission Hills/Hillcrest	925 West Washington Street, San Diego, CA 92103
Linda Vista	2160 Ulric Street, San Diego, CA 92111
University Heights	4193 Park Boulevard, San Diego, CA 92103

Final EIR

Following the end of the public review period, the City as lead agency will provide written responses to all comments received on the Draft PEIR per CEQA Guidelines Section 15088. Detailed responses to the comments received during public review, a Mitigation Monitoring and Reporting Program (MMRP), Findings, and a Statement of Overriding Considerations for impacts identified in the PEIR as significant and unavoidable will be prepared and compiled as part of the PEIR finalization process. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR as being complete and in accordance with CEQA, and whether to adopt the MMRP, Findings, and Statement of Overriding Considerations. The Final PEIR will be available for public review for at least 14 days before the City Council public hearing to provide commenters the opportunity to review the written responses to their comment letters.

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2 Environmental Setting

The CPU area encompasses the City of San Diego Mission Valley Community Plan area. This chapter provides a brief overview of the CPU area's location and existing physical characteristics. Further details regarding existing conditions within the CPU area as it relates to individual environmental topics can be found in the Environmental Settings of relevant sections of Chapter 4: Environmental Analysis.

2.1 Project Location

2.1.1 REGIONAL LOCATION

Mission Valley is located in central San Diego along the San Diego River between Mission Bay and the Grantville neighborhood. With hillsides to the north and south, it is an east-west oriented linear valley about five miles in length, bordered by several other Community Plan areas: Old Town San Diego, Uptown, Greater North Park, Normal Heights, Kensington-Talmadge, and College Area to the south; Navajo to the east; Tierrasanta, Kearny Mesa, Serra Mesa, and Linda Vista to the north; and Mission Bay Park to the west.

The San Diego River, which runs westward through Mission Valley, is a defining feature of the community. The valley sits at the crossroads of the regional freeway system, enjoying access from Interstate (I-) 5, I-8, I-15, I-805 and State Route 163 (SR-163). Mission Valley is a regional center of offices, hotels, and retail businesses, as well as a major regional visitor center, with a concentration of hotels located in close proximity to tourist attractions including Mission Bay Park, Sea World, and Balboa Park.

2.1.2 PLANNING AREA

As shown in Figure 2.1-1, the CPU area is generally bounded by Friars Road and the northern slopes of the valley on the north, the eastern banks of the San Diego River on the east, the southern slopes of the valley on the south, and I-5 on the west. The CPU area encompasses approximately 3,216 acres.

2.2 Geography and Topography

The CPU area is located within the coastal portion of the Peninsular Ranges geomorphic province, which extends approximately 920 miles from the Los Angeles Basin to the southern tip of Baja, California, and varies in width from approximately 30 to 100 miles. The topography of the valley is that of a wide, flat floodplain surrounded by steep slopes and mesas to the north and south. The valley gently slopes from about 600 feet above mean sea level on the eastern end of the community, to sea level at the western end. The San Diego River is the lowest point of the drainage basin and flows from east to west through the center of the CPU area before it empties into the Pacific Ocean.

2.3 Existing Land Use

2.3.1 CPU AREA LAND USE

The CPU area is a regional center of offices, hotels, and retail businesses, as well as a major regional visitor center, with a concentration of hotels located in close proximity to tourist attractions including Mission Bay Park, Sea World, and Balboa Park. The following land uses are current as of 2018.

Commercial uses, including: office, retail and general commercial, and hotel, motel, and lodging, constitute the most prominent existing land use in Mission Valley, occupying 814 acres or 25 percent of the CPU area. Commercial uses are generally located along the I-8 corridor and along SR-163. Recreation and open space uses comprise 655 acres or 20 percent of the CPU area and are mostly located within the Mission Valley Preserve and natural areas along the San Diego River. Residential uses cover 473 acres or 15 percent of the CPU area and are generally located north of I-8 and east of SR-163. Residential uses consist almost entirely of multi-family development with some mixed-use development at Rio Vista that is primarily residential. Public and community facilities occupy 290 acres, or 9 percent, of the CPU area, with the majority of this use located at the Stadium. There are about 64 acres of industrial land in the CPU area. Most of these uses are concentrated in a business park setting along Mission Valley Drive and Metropolitan Drive. Vacant land constitutes 116 acres or 4 percent of the CPU area. The majority of vacant land is in the Quarry Falls Specific Plan area, bordered on the south by Friars Road and on the east by I-805, to be developed as part of the Civita project. Existing land uses and zoning within the CPU area are shown in Table 4.8-1: Existing Land Uses in Mission Valley, and Figure 4.8-1: Existing Land Use in Section 4.8: Land Use.

2.3.2 SURROUNDING LAND USES

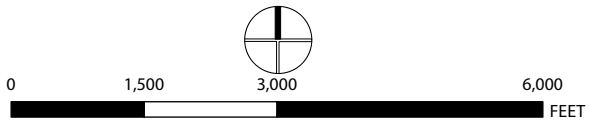
Surrounding land uses include the 4,235-acre Mission Bay Park to the west and a mix of residential and community commercial in Navajo to the east. To the north lie primarily residential neighborhoods within Linda Vista and Serra Mesa, open space and residential in Tierrasanta, and open space and industrial use in Kearny Mesa. Historic, commercial, and recreational areas like Presidio Park and Presidio Hills Golf Course in Old Town San Diego, and residential and open space in Uptown, Greater North Park, Normal Heights, Kensington-Talmadge, and College Area are located to the south. Beaches and other coastal amenities are located around Mission Bay Park to the west.

Figure 2.1-1: Planning Area



- Trolley Stops
- Light Rail
- Freeways
- Ramps
- Streams/Creeks
- Lakes/Ponds/Bays
- Parks
- Mission Valley Community Plan Boundary
- Community Planning Areas

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2.4 Hydrology and Water Quality

2.4.1 DRAINAGE

The CPU area is located within the San Diego River Watershed, within the Mission San Diego Hydrologic Subarea of the Lower San Diego Hydrologic Area of the San Diego Hydrologic Unit. The CPU area encompasses the lower 6.5 miles of the San Diego River and is located in one of the most downstream locations of the San Diego River Watershed, making the CPU area the recipient of storm water runoff from upstream communities. Storm water runoff from Mission Valley generally stays within the boundaries of the CPU area until it drains through storm drain pipes, streets, gutters, cross gutters, or open channels into the San Diego River and from there into the Pacific Ocean. Because the CPU area is mostly developed and highly impervious—with the exception of the San Diego River channel and Riverwalk Golf Course—nearly all rainfall landing on the CPU area can be expected to become runoff. Specific details regarding drainage within the CPU area are described in Section 4.7: Hydrology and Water Quality.

2.4.2 WATER QUALITY

The CPU area is generally developed outside of the San Diego River and is mostly impervious. The land uses that make up the CPU area generate a number of pollutants, including sediment, nutrients, heavy metals, organic compounds, trash, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides. Storm water runoff generated in the CPU area flows to two receiving water bodies: The Lower San Diego River and the Pacific Ocean Shoreline (at the San Diego River Outlet at Dog Beach). These two water bodies are listed as impaired on the current Clean Water Act Section 303(d) List. Specific pollutants for these receiving waters are discussed in Section 4.7: Hydrology and Water Quality.

2.5 Biological Resources

There are 12 vegetation communities/land cover types present in the CPU area, including coastal sage scrub, disturbed coastal sage scrub, chaparral, disturbed land, eucalyptus woodland, urban/developed, disturbed riparian scrub, freshwater marsh, open water, riparian scrub, riparian woodland, and riparian woodland-restoration communities.

The CPU area contains the following sensitive vegetation communities: coastal sage scrub, disturbed coastal sage scrub, chaparral, disturbed riparian scrub, freshwater marsh, open water, riparian scrub, and riparian woodland. Specific information on sensitive biological resources and their location in the CPU area is described in Section 4.2: Biological Resources, and Figure 4.2-1: Vegetation Communities.

Much of the recreation and open space land surrounds the San Diego River and lies within the City's Multi-Habitat Planning Area.

2.6 Geology and Paleontology

Soils in the CPU area consist of artificial fill (both documented and undocumented), young alluvium, young colluvium, old alluvium, old paralic deposits (Bay Point Formation), and formational soils of the San Diego and Mission Valley Formations, Stadium Conglomerate, and the Friars and Scripps Formations. Artificial fill is present in much of the CPU area in association with development such as structures and roadways and exhibits no potential for the occurrence of sensitive paleontological resources.

Alluvial and colluvial deposits are found along the floodplain of the San Diego River, the south side of the valley, and in portions of the eastern side of the valley near the Stadium; these materials exhibit a low potential for the occurrence of sensitive paleontological resources.

The Bay Point Formation, on the north side of the CPU area; the San Diego Formation, exposed on the southern slopes of Mission Valley; the Scripps Formation, Mission Valley Formation, and Stadium Conglomerate, present throughout the CPU area but most exposed on the northern flank of Mission Valley; and the Friars Formation, exposed on the north side of Mission Valley at its eastern end, all exhibit a high potential for the occurrence of sensitive paleontological resources.

Specific information on geologic conditions in the CPU area is provided in Section 4.3: Geology, Soils, and Seismicity, and information pertaining to paleontological resources is described in Section 4.10: Paleontological Resources.

2.7 Historical, Cultural and Tribal Cultural Resources

The CPU area is within the traditional territory of the Kumeyaay people. The Kumeyaay of the prehistoric and contact periods inhabited San Diego County from Agua Hedionda Lagoon in Carlsbad south into Baja California and from the Pacific Ocean east to the Salton Sea.

The CPU area is home to one historic building listed in the National Register of Historic Places and the San Diego Historic Resources Register, the Mission San Diego de Alcalá, located at 10818 San Diego Mission Road.

Development from the 1950s and 1960s is now potentially eligible for listing on the City, State, and national registers. The Historic Context Statement (Appendix H) completed for this analysis identifies one potential historic district along Hotel Circle. Resources that contribute to this potential historic district are hotels and motels built in the 1950s to early 1960s that are one or two stories in height and offer amenities such as swimming pools, including Town & Country and Mission Valley Inn.

The Native American Heritage Commission did not identify any recorded Native American cultural resources within the CPU area; however, given prehistoric and historic activity in the CPU area and information provided through contact with local tribes, there is potential for tribal cultural resources to be encountered in the CPU area. Specific information on historical, cultural, and tribal cultural resources in the CPU area is described in Section 4.6: Historical, Cultural, and Tribal Cultural Resources.

2.8 Transportation Network

2.8.1 ROADWAYS AND ACCESS

The CPU area is served by five freeways: I-5, I-8, I-15, I-805, and SR-163. Major roadways include Friars Road, Camino De La Reina, Mission Center Road, Hotel Circle North and South, Mission Village Drive, Qualcomm Way, Camino Del Rio North and South, and Taylor Street.

2.8.2 TRANSIT

The CPU area is currently served by nine bus routes, including routes 6, 14, 18, 20, 25, 41, 88, 120, and 920. Additional bus routes pass through the community and do not have stops within Mission Valley, but are adjacent to and accessible from Mission Valley, including routes 13, 44, and 105. Most of the CPU area is within a quarter-mile of a transit stop. The Sycuan Green Line, part of the San Diego Metropolitan Transit System's Trolley system, connects the east and south county regions with the Downtown region and bisects the CPU area in the east-west direction.

2.8.3 PEDESTRIAN AND BICYCLE NETWORK

In addition to transit, bikeways and pedestrian sidewalks exist within the CPU area. Class I bike paths are located in the CPU area that include the Murphy Canyon Trail adjacent to Stadium Way, the San Diego River Trail, and the Ocean Beach Bike Path. Class II bike lanes are located along Friars Road, Hotel Circle North and South, Camino del Rio North and South, and Mission Center Road. Class III bike routes are located along Hotel Circle South and Camino de la Reina. A Class IV two-way cycle track exists along the south side of Friars Road from the west end of the community to roughly 900 feet west of Fashion Valley Road. Most streets within the CPU area include sidewalks; though roadways with missing sidewalks include major segments of Friars Road, Hotel Circle North and South, and Camino del Rio North and South. Specific information on alternative transportation in the CPU area is described in Section 4.13: Transportation.

2.9 Air Quality and Climate

The CPU area is located within the San Diego Air Basin (SDAB) of the San Diego Air Pollution Control District. Local climate for the San Diego region, including the CPU area, is influenced by proximity to the Pacific Ocean and semi-permanent high pressure systems that result in warm, dry summers and mild, occasionally wet winters. The average annual precipitation for the area is approximately 10 inches, falling primarily from November to April. The annual average maximum temperature in the CPU area is approximately 67 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56°F. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds blowing pollutants away from the coast toward inland areas.

Motor vehicles are San Diego County's leading source of air pollution. Stationary sources such as gasoline stations, power plants, dry cleaners, and other commercial and industrial uses also contribute to air pollution. The SDAB exceeds thresholds set by the State for Ozone, PM₁₀ (inhalable particulate matter), and PM_{2.5} (fine particulate matter). Information on air quality in the San Diego region, including the CPU area, is described in Section 4.1: Air Quality.

The CPU area is currently a source of anthropogenic greenhouse gases (GHGs), with emissions generated by vehicular traffic and by the energy use, area sources, water use, and solid waste disposal practices of existing development. Specific information on GHG emissions in the San Diego region, including the CPU area, is described in Section 4.4: Greenhouse Gas Emissions and Energy.

2.10 Public Infrastructure and Services

2.10.1 PUBLIC SERVICES AND FACILITIES

Parks and Recreation

There are two population-based parks in the CPU area, Sefton Field and the Civita Central Neighborhood Park. A Site Development Permit has been approved for the San Diego River Discovery Center at Grant Park, a 17-acre area located at the intersection of Qualcomm Way and Camino del Rio (North) along the San Diego River. Just southeast of the CPU area is the 12-acre Presidio Community Park, comprising approximately nine acres leased as a golf course and three acres of usable population-based park land. The CPU area also has access to open space areas including the Mission Valley Preserve, located along the river on the western end of CPU area; additional City-owned open space located along the steep south and north facing hillsides; and Cottonwood Grove Park, located immediately to the west of Sefton Field.

Libraries

The CPU area is served by the Mission Valley Branch Library, which is located south of the Fenton Marketplace and across from the Fenton Parkway trolley station. Generally, the CPU area to the east of SR-163 is within the two-mile service area of the Mission Valley Branch Library, while the remainder of the CPU area is within the two-mile service radii of other branches, including the Mission Hills/Hillcrest, Linda Vista, and University Heights branches. The new Mission Hills/Hillcrest Library is a 15,000-square-foot facility that will replace the existing 3,850-square-foot facility and is scheduled to open in 2019. As of 2018, there are no other plans to build new or expand upon existing libraries in or near the CPU area.

Schools

The CPU area is served by the San Diego Unified School District (SDUSD) and many private, charter, and special education schools in and surrounding the CPU area. All public schools that serve the CPU area are located outside of the CPU area and all public school students who live in the CPU area travel outside of the neighborhood to attend school. As of 2018, SDUSD is in the process of planning a new technology-oriented elementary school to be located at the intersection of Via Alta and Civita Boulevard within the CPU area. The school would educate children in grades pre-K through 5th grade and would accommodate up to 500 students and a staff of up to 40 individuals.

Public Safety

The City of San Diego's Fire-Rescue Department (SDFD) provides fire, emergency medical, lifeguard, and emergency management services for the CPU area. There is one SDFD fire station (Fire Station 45) within the CPU area located near the intersection of Friars Road and Mission Village Drive at 9366 Friars Road. No new fire stations are planned within the CPU area; however, a joint police and fire station is proposed at the existing San Diego Police Department (SDPD) Western Division facility, located at 5215 Gaines Street in the bordering Linda Vista Community Plan area.

Police services in the CPU area are provided by the SDPD. The SDPD groups neighborhoods in the city into nine divisions. The portion of the CPU area west of SR-163 is served by the Western Division, and the portion east of SR-163 is served by the Eastern Division.

2.10.2 UTILITIES

Water

The City's Public Utilities Department (PUD) provides potable water service to the CPU area. The PUD water system extends over 404 square miles and includes both potable and recycled water facilities. The City's water system has nine reservoirs, two water reclamation plants, three water treatment plants, and 29 treated water storage facilities.

Sewer

Wastewater in the CPU area is managed by the PUD's Wastewater Branch, which operates the two components of the City's wastewater system: The Metropolitan Sewerage Sub-System and the Municipal Wastewater Collection Sub-System. Wastewater that is collected is conveyed through various interceptors and pipelines to pump stations, and then to the Pacific Ocean via outfalls.

Storm Water

The City's Transportation and Storm Water Department is responsible for the operation and maintenance of the City's storm drain system. Nearly all storm water and precipitation runoff remains within the CPU area until it drains into the San Diego River and eventually the Pacific Ocean.

Solid Waste

The City's Environmental Services Department manages residential solid waste disposal for eligible residences in the CPU area. Waste generated in the city is primarily taken to three landfills: the West Miramar Sanitary Landfill, Sycamore Landfill, and Otay Landfill. The Miramar and Sycamore landfills are both located in the city, while the Otay Landfill is located in the unincorporated county. Collection services for eligible residences are provided once per week under the People's Ordinance and include curbside recyclable materials and yard waste collection. Refuse not eligible for the City's collection services is collected by privately operated franchised haulers.

Energy

San Diego Gas and Electric (SDG&E) provides electricity and natural gas to the CPU area.

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3 Project Description

The project analyzed in this Draft PEIR is the Mission Valley Community Plan Update (proposed CPU), which is an update to the Community Plan that guides development of the entire Mission Valley community. The proposed CPU is a policy document which describes the community's vision and identifies strategies for enhancing community character and managing change. It includes goals, policies and implementing actions to guide local decision-making and public investments for the CPU area in the future. This Draft PEIR analyzes the environmental effects of the proposed CPU dated February 6, 2019.

Development in Mission Valley will be guided and regulated through the proposed CPU, the City of San Diego Municipal Code (SDMC), the General Plan, and applicable Specific Plans. Specific development standards for development within the San Diego River Park and Hillside Review areas in the CPU area are also proposed to be codified in Chapter 13, Article 2, Division 14 of the SDMC as a Community Plan Implementation Overlay Zone (CPIOZ) as part of the proposed CPU. These standards currently exist as Chapter 15 Article 14 of the SDMC, Mission Valley Planned District, and would become CPIOZ standards upon adoption of the proposed CPU.

This chapter summarizes the key components of the proposed CPU that will be analyzed in this PEIR. The proposed CPU is hereby incorporated by reference into this project description and should be referenced for further detail.

3.1 Purpose and Objectives of the Proposed CPU

The City of San Diego's General Plan, adopted in 2008, is a comprehensive "blueprint" for the City's growth over the next 20 years; it provides the broad citywide vision and framework for development. Central to the plan is the "City of Villages" strategy, which focuses growth into pedestrian-friendly, mixed-use activity centers linked to an improved regional transit system. As a part of this strategy, the General Plan identifies over 50 Community Planning Areas in the city, including Mission Valley, for which Community Plans have been developed to refine citywide goals and policies to address issues unique to each community, and to provide more localized policies.

3.1.1 PURPOSE

The adopted Mission Valley Community Plan provides a detailed framework to guide development in Mission Valley. Originally adopted in 1985, the Community Plan has undergone over 20 amendments in the intervening years. The Community Plan update process has been undertaken to bring the Community Plan up to date by:

- Analyzing current land use, development, and environmental characteristics;
- Evaluating changes in demographics that may affect land use needs;
- Understanding demand for housing and commercial development;
- Working with community members and stakeholders to determine key issues of concern, desires, and preferences to establish a vision and objectives for the proposed CPU;
- Evaluating the “fit” of current Community Plan policies to achieve community goals and regulatory requirements; and
- Ensuring that policies and recommendations remain in harmony with the General Plan and citywide policies, as well as regional policies.

3.1.2 OBJECTIVES

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15124(b), the following objectives have been identified to outline the underlying purpose for the proposed CPU. These objectives were used by the City as the lead agency in developing a reasonable range of alternatives to evaluate in this Draft PEIR and will ultimately aid in preparing findings and overriding considerations, if necessary. The primary objectives for the proposed CPU are to:

- Establish a sustainable, walkable community with enriched pedestrian spaces including linear parks and nodes of pedestrian-scaled, visually stimulating development that support a mix of uses;
- Establish a strengthened grid system that supports local and regional roadway network efficiency, with a finer grain of streets that provide a second layer of neighborhood mobility more suitable to pedestrian and daily community trips;
- Accommodate new roadway connections within developed areas or areas planned for development for improved connectivity and adequate emergency access and response;
- Provide housing and employment opportunities in close proximity to transit;
- Meet the City’s Climate Action Plan goals;
- Create a branching park and pedestrian pathway system with the San Diego River as the backbone and organizing framework;
- Establish usable public spaces that provide amenities for recreation and relaxation for community enjoyment;
- Encourage architecture that is distinctive and memorable, with attention paid to building quality, materials, details, and amenities that give back to the community; and
- Enhance and maintain the hillsides that form the edges of the valley.

3.2 Proposed Community Plan Organization

The proposed CPU document is organized as follows:

- **Introduction.** The Introduction describes the CPU area and how decision-makers, property owners, developers, and the community are to use the plan.
- **Vision.** The Vision section provides a conceptual picture of a future Mission Valley and describes the ways the community is anticipated to change over the planning horizon. The Vision section also presents the Planned Land Use diagram, along with descriptions of each land use designation with the CPU area.
- **Implementation.** This section provides guidance on needed service levels for various community assets at full plan buildout and includes implementing actions (IA) to be completed by the City to help provide for future facilities. It also provides design guidelines (DG), which are policy guidance to streamline development and establish the building blocks for the regulatory mechanisms to implement the Vision section of the proposed CPU. The section is further divided into the following subject areas:
 - *Mobility.* This subsection describes the future pedestrian, bicycle, transit, and vehicular roadway network, and lists planned roadway modifications. Specific direction is provided in a series of implementing actions (IA-1 through IA-40).
 - *Parks and Open Space.* This subsection describes opportunities for active recreation, passive recreation, and resource conservation. Specific direction is provided in a series of implementing actions (IA-41 through IA-6364).
 - *Public Facilities, Services, and Safety.* This subsection outlines the community facilities needed to ensure appropriate levels of public services are maintained, as well as strategies to help manage safety issues. Topics addressed include first responders, schools, geologic and seismic hazards, hazardous materials, flooding/sea rise/storm water, noise, and Smart City San Diego. Specific direction is provided in a series of implementing actions (IA-6469 through IA-9297).
 - *Historic Preservation.* This subsection includes a brief historical context for the CPU area. Specific direction is provided in a series of implementing actions (IA-65 through IA-68).
 - *Urban Design.* This subsection describes requirements and recommendations for achieving high-quality design of the built environment. It addresses design of the public realm (rights-of-way, streetscapes, signage, public open spaces, and views); general design (design of private property throughout the community); and area-specific design (design within specific areas, such as Transit-Priority Areas, river areas, hillsides, community nodes/main streets, freeway-adjacent areas, and south of Interstate 8 [I-8]). Specific guidance is provided in a series of design guidelines (DG-1 through DG-109).
- **Policies for Development.** This section presents development regulations and policies to which all future private development must adhere. Included are the Hillside, Conservation, Design, and Height Limitation CPIOZ; the San Diego River Subdistrict CPIOZ; and

General and ~~Area~~ Site-Specific policies. The two CPIOZs are taken directly from the existing SDMC Chapter 15, Article 14, Division 3 and are presented in the proposed CPU as bullet points, while the General and Site-Specific policies, which were written to ensure private development successfully implements that Plan's vision, are identified by three-letter prefixes corresponding to topic.

Throughout the proposed CPU, a narrative provides context and guidance for implementation of the Vision, while specific direction and guidance is provided through implementing actions (denoted with IA), design guidelines (DG), bullet points in the two CPIOZs, and the policy tables. The specific direction and guidance applies to projects that are the responsibility of the City (rights-of-way, parks, and other development on publicly-owned land) as well as to projects on private development that are the responsibility of the landowner/developer. As noted in the proposed CPU, the IAs address elements that are the responsibility of the City, and the DGs and policies for development address elements that are the responsibility of the landowner/developer.

3.3 Overview of Proposed Community Plan

3.3.1 DIFFERENCES BETWEEN THE ADOPTED COMMUNITY PLAN AND THE PROPOSED CPU

The proposed CPU is an update to the Mission Valley Community Plan, adopted in 1985 and last amended in 2018. The existing Community Plan describes the community's history and environmental context, and presents the various Community Plan elements, including Land Use; Transportation; Open Space; Development Intensity; Community Facilities; Conservation; Cultural and Heritage Resources; Urban Design; and Implementation. In each element, specific direction is provided in the form of Objectives, Proposals, and Development Guidelines.

The proposed CPU includes a brief background on the community's history; however, it does not describe the CPU area's environmental context or provide any information on design alternatives. The proposed CPU is focused on the Vision for Mission Valley and the various ways the City and development community will implement the Vision over the planning horizon, through implementing actions, design guidelines, and policies for development. Notably, the proposed CPU does not include a Development Intensity section, instead relying on development standards as defined in Chapter 13 of the SDMC to limit the developability of any given parcel. The proposed CPU is assumed to have a buildout year of 2050.

The proposed CPU envisions the following major changes related to the community's vision for specific portions of the CPU area:

- **Western Mission Valley.** To acquire a residential and park focus with complementing office and retail uses.
- **South of I-8.** To be enhanced through higher quality building materials, new opportunities for regional retail development, and restoration of the landscape.

- **The Stadium Site.** Redevelopment to occur through a future ~~Specific Plan or Campus Master Plan, which would use the content requirements of a Specific Plan prepared pursuant to California Government Code Section 65451(a).~~¹
- **Central Mission Valley.** To become an active, mixed-use urban hub and central business district.
- **Eastern Mission Valley.** To support higher density residential development with enhanced multi-modal connectivity.

The full range of proposed mixed-use, residential, and non-residential land uses in the proposed CPU is summarized in Table 3.3-1: Mission Valley Land Use Designations. Heights for all uses would be controlled by zone per the SDMC.

Table 3.3-1: Mission Valley Land Use Designations

<i>Land Use Designation</i>	<i>Typical Uses</i>	<i>Typ. Parking Configuration</i>	<i>Allowed Density/Intensity</i>
Residential-Low	Two- and three-story condominium and apartment buildings	Attached garages	Up to 44 du/ac
Residential-Medium	Condominium/apartment buildings with centralized amenities and individual or shared open space areas	Structured parking	44-73 du/ac
Residential-High	Large block condominium/apartment buildings with shared amenities and open space areas	Underground or structured parking	73-109 du/ac
Mixed Use-Medium	Resident- and employee-serving commercial uses. Residential uses in horizontal or vertical mixed-use formats.	Underground or structured parking	Up to 85 du/ac
Mixed Use-High	Employment-based uses that serve residents and workers; Residential uses in horizontal or vertical mixed-use formats.	Underground or structured parking	73-140 du/ac
Public/Institutional	Public serving uses (e.g., aquatic centers, recreation centers, stadiums, universities/schools/classrooms, infrastructure support buildings)	Not specified	Controlled by Zone
Regional Retail	Retail uses in an urban format and plazas for community gathering (e.g., malls, big box stores, car dealerships).	Limited surface parking	
Commercial/Office/Hotel	A variety of commercial uses that provide goods, services, and employment opportunities (e.g., lifestyle centers, main street/strip commercial, professional hub, urban office, flex office, campus office, executive hotel, leisure/resort hotel, high-rise hotel)	Not specified	

1. The proposed CPU assumed that 4,800 dwelling units, two million square feet of office space, 300,000 square feet of retail space, 450 hotel rooms, 38.1 acres of active park, and 4.9 acres of open space, and a 40,000 seat stadium would be developed on the Stadium site. The future Specific Plan for the Stadium site will provide more site-specific development details.

Sources: Dyett & Bhatia, 2018; City of San Diego, 2018.

Table 3.3-1: Mission Valley Land Use Designations

<u>Land Use Designation</u>	<u>Typical Uses</u>	<u>Proposed Zoning designations</u>	<u>Allowed Density/ Intensity</u>
<u>Residential-Low</u>	<u>Two- and three- story condominium and apartment buildings</u>	<u>RS-1-1, RS-1-3, RM-1-1, RM-1-3, RM-2-4, RM-2-5, RM-3-7</u>	<u>Up to 44 du/ac</u>
<u>Residential-Medium</u>	<u>Condominium/apartment buildings with centralized amenities and individual or shared open space areas</u>	<u>RM-3-7, RM-3-8, RM-3-9</u>	<u>44-73 du/ac</u>
<u>Residential-High</u>	<u>Large block condominium/apartment buildings with shared amenities and open space areas</u>	<u>RM-3-9, RM-4-10</u>	<u>73-109 du/ac</u>
<u>Mixed Use-Medium</u>	<u>Resident- and employee-serving commercial uses. Residential uses in horizontal or vertical mixed-use formats.</u>	<u>EMX-1, RMX-1</u>	<u>Up to 85 du/ac</u>
<u>Mixed Use-High</u>	<u>Employment-based uses that serve residents and workers; Residential uses in horizontal or vertical mixed-use formats.</u>	<u>EMX-2, RMX-2</u>	<u>73 -140 du/ac</u>
<u>Public/ Institutional</u>	<u>Public-serving uses (e.g., aquatic centers, recreation centers, stadiums, universities/ schools/classrooms, infrastructure support buildings)</u>	<u>AR-1-2, RS-1-1, RM-1-3, RS-1-14</u>	
<u>Regional Retail</u>	<u>Retail uses in an urban format and plazas for community gathering (e.g., malls, big box stores, car dealerships).</u>	<u>CO-2-2, CR-2-1</u>	<u>Controlled by Zone</u>
<u>Commercial/ Office/Hotel</u>	<u>A variety of commercial uses that provide goods, services, and employment opportunities (e.g., lifestyle centers, main street/strip commercial, professional hub, urban office, flex office, campus office, executive hotel, leisure/resort hotel, high-rise hotel)</u>	<u>CC-3-5, CC-3-8, CC-3-9, CO-1-2, CO-3-3, CV-1-1, CV-1-2</u>	

Sources: Dyett & Bhatia, 2018; City of San Diego, 2018.

3.3.2 VISION AND LAND USE FRAMEWORK

As articulated in the proposed CPU, new and creative housing opportunities will be a defining feature of a future Mission Valley. Existing sites are re-envisioned to better integrate housing into the area, with a balance between housing, employment, and shopping opportunities. The proposed land use plan would create opportunities for housing on sites currently developed with commercial uses, encouraging both vertical and horizontal formats of mixed-use development. Proposed CPU land use designations are described in Table 3.3-1 and the proposed land use diagram is shown in Figure 3.3-1.

3.3.3 ZONING

Properties within the CPU area will be rezoned to implement the updated Mission Valley Community Plan. Currently, properties within the CPU area are regulated by the Mission Valley Planned District Ordinance, which includes special regulations that supplement the regulations of the underlying zones and subdistricts. Through a rezoning ordinance, the regulations of the Mission Valley Planned District Ordinance will be removed and replaced with citywide base zoning. Existing zoning is shown in Figure 3.3-2 and proposed zoning is shown in Figure 3.3-3. The updated zoning will focus density in Urban Village areas along the trolley line, specifically in the areas zoned for mixed-use, shown in purple in Figure 3.3-3.

3.3.4 PROPOSED IMPLEMENTATION FRAMEWORK

Mobility

The Mobility section includes the following subsections: Walkability, Bicycling, Transit, Streets and Freeways, Intelligent Transportation Systems and Transportation Demand Management, and Parking. For each of these subsections, the proposed CPU describes the overall network and provides implementing actions to achieve the vision described. New features include continuous Class I bike paths along the San Diego River; a Class IV cycle track along Friars Road and Hotel Circle North and South; new pedestrian/bicycle bridges and connections; a proposed light rail station as part of the Riverwalk site; a new light rail station at the intersection of the proposed purple line and the existing green line; a new light rail station near the intersection of the existing green line and I-15; and potential skyways leading south from the Fashion Valley and Rio Vista transit stations. New roadways within the CPU area include:

- ~~Levi Cushman Street “B”~~ Riverwalk Street “U” from Fashion Valley Road to the proposed Riverwalk Street “J”;
- Mission City Street “I” that would connect Fenton Parkway to the Stadium Site;
- Riverwalk Street “J” that would connect Friars Road to ~~Levi Cushman Street “B”~~ Riverwalk Street “U” and then continue across the river to Hotel Circle South with a new I-8 interchange;
- An extension of Fenton Parkway across the river to Camino Del Rio North/Mission City Parkway;
- An extension of Hazard Center Drive west to Riverwalk Drive under State Route 163 (SR-163);

- An extension of Riverwalk Drive from Fashion Valley Road to Riverwalk Street “J”; and
- An extension of Frazee Road north to Mission Valley Road/Metropolitan Drive.

In addition, the proposed CPU recommends that local street connections be made through super-blocks with redevelopment such as the extension of Westside Drive from Mission Center Road to Frazee Road. Figures 4.13-3 through 4.13-6 show the proposed mobility network.

Parks and Open Space

The Parks and Open Space section includes the following subsections: Park Development, Park Preservation and Expansion, Park Accessibility, and Open Space and Resource-Based Parks. The proposed CPU identifies two population-based major parks, the planned 34-acre Stadium Park and the planned 27-acre Riverwalk Park. The proposed CPU also identifies the expansion of the Civita Central Neighborhood Park from 16 acres to 37 acres, and a planned park at the Post Office site of 4 acres in size. Smaller parks and park equivalencies, as well as one recreation center and one combined recreation and aquatic center, are also proposed in the CPU (see Table 5 of the proposed CPU).

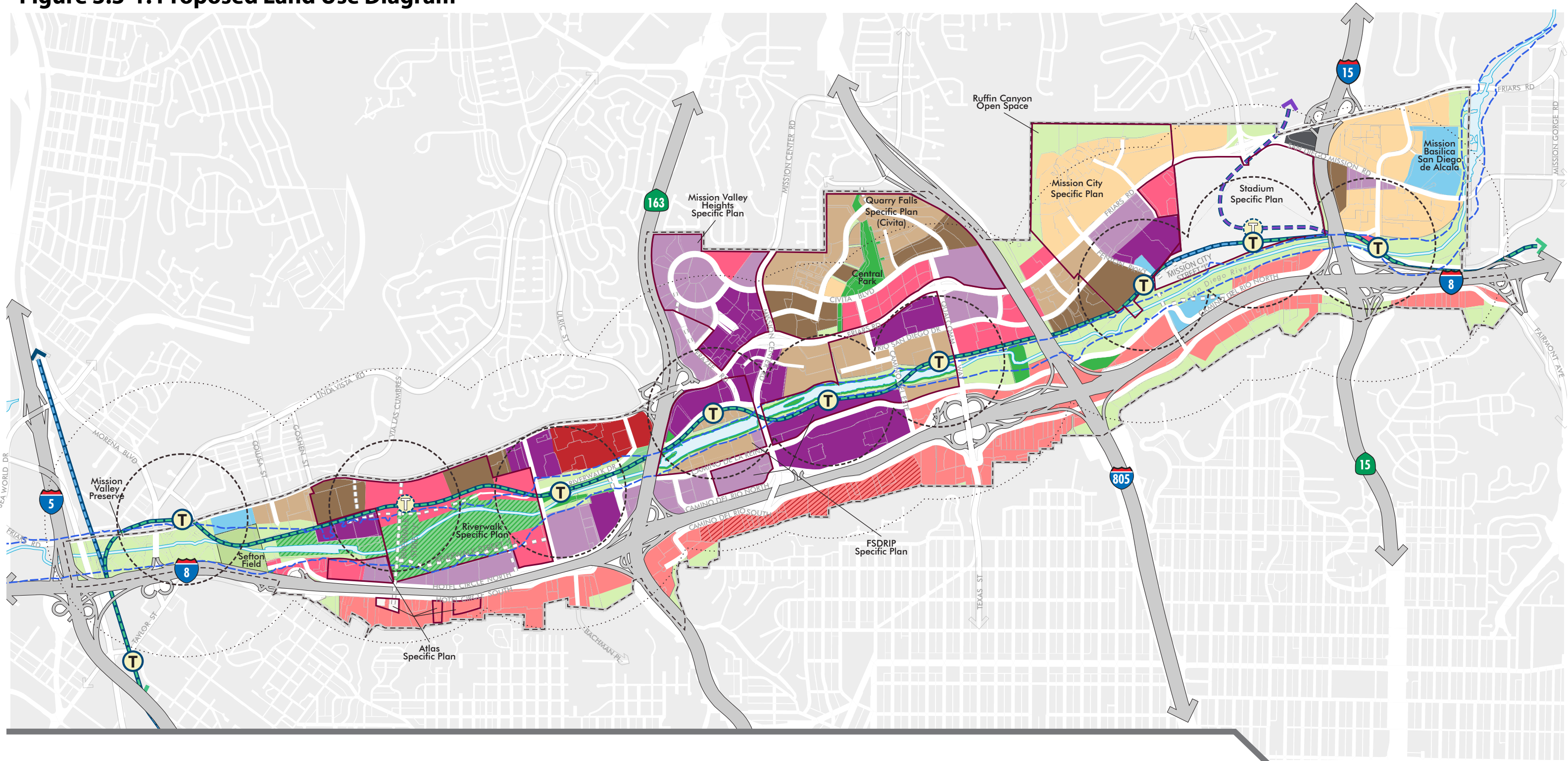
Public Facilities, Services, and Safety

The proposed CPU identifies ~~two~~one proposed/potential school locations within the community; ~~one at Civita and one at the Stadium site.~~ The Quarry Falls Specific Plan also includes plans for a school site on the property. As of 2018, SDUSD is still in the process of planning the new school (San Diego Unified School District, 2018). The proposed CPU also identifies a potential police facility at the Stadium site. The CPU does not propose the construction of new library facilities.

Urban Design

The Urban Design section provides guidance to ensure high-quality project design. The narrative, graphics, and design guidelines encourage projects that have an active public realm and street frontage, usable public open space, safe and easy access and connectivity, and sustainable materials and methods.

Figure 3.3-1: Proposed Land Use Diagram



General Information

- Mission Valley Community Plan Area
- 100 Year Floodway
- Specific Plan
- Parcels
- Planned Roadway
- San Diego River

Transit

- Existing Trolley (Blue Line)
- Existing Trolley (Green Line)
- Planned Trolley (Purple Line)
- Planned Trolley Stop (Riverwalk)
- Trolley Station Design District (1/4 mile)
- Transit Priority Area (1/2 mile)

Land Use

- Mixed Use (HD)
- Mixed Use (MD)
- Residential (HD)
- Residential (MD)
- Residential (LD)
- Public/Institutional

- Office and Visitor Commercial
- Office and Visitor Commercial**
- Regional Commercial**
- Regional Office and Visitor Commercial**
- Industrial

**Residential Prohibited

Park and Open Space

- Existing Park
- Existing Open Space
- Potential Park
- Potential Open Space
- Potential Park/Open Space

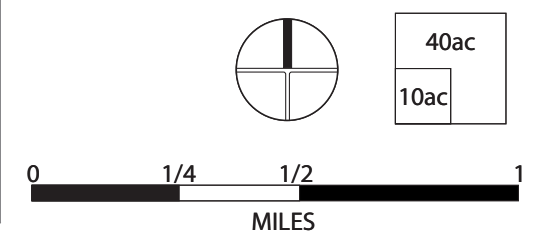
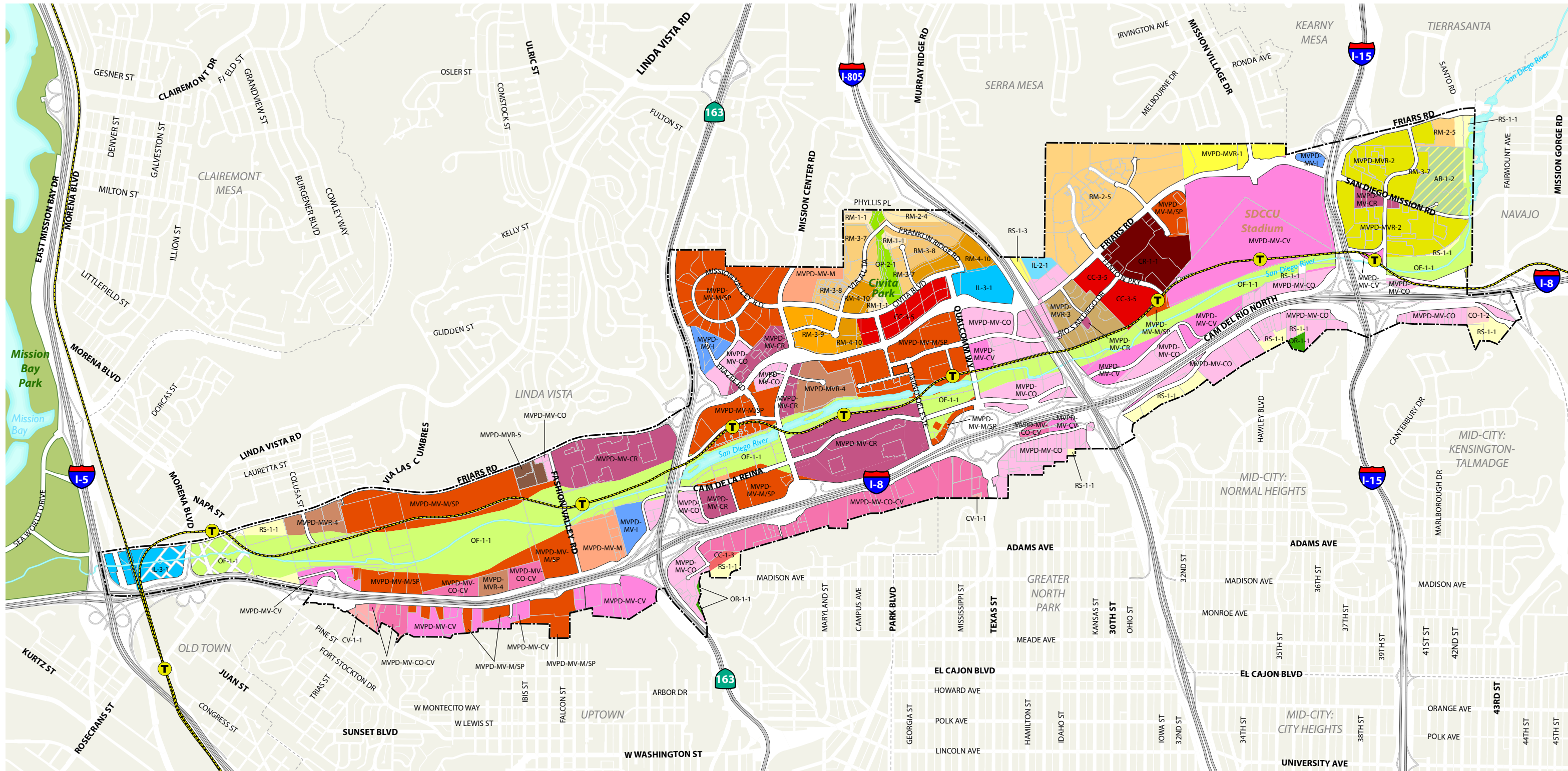


Figure 3.3-2: Existing Zoning



<p>Mission Valley Community Plan Boundary</p> <p>Agriculture/Open Space</p> <ul style="list-style-type: none"> Open Space - Floodplain (OF-1-1) Open Space - Park (OP-2-1) Open Space - Residential (OR-1-1) Agricultural - Residential (AR-1-2) 	<p>Residential</p> <ul style="list-style-type: none"> Residential - Single Unit (RS-1-1) Residential - Single Unit (RS-1-3) Residential - Multiple Unit (RM-1-1) Residential - Multiple Unit (RM-2-4) Residential - Multiple Unit (RM-2-5) Residential - Multiple Unit (RM-3-7) Residential - Multiple Unit (RM-3-8) Residential - Multiple Unit (RM-3-9) Residential - Multiple Unit (RM-4-10) 	<p>Commercial</p> <ul style="list-style-type: none"> Commercial - Office (CO-1-2) Commercial - Visitor (CV-1-1) Commercial - Community (CC-1-3) 	<p>Commercial - Community (CC-3-5)</p> <p>Commercial - Regional (CR-1-1)</p> <p>Industrial</p> <ul style="list-style-type: none"> Industrial - Light (IL-2-1) Industrial - Light (IL-3-1) 	<p>Mission Valley Planned District</p> <ul style="list-style-type: none"> Commercial Office (MVPD-MV-CO) Commercial Visitor (MVPD-MV-CV) Commercial Office or Visitor (MVPD-MV-CO-CV) Commercial - Retail (MVPD-MV-CR) Industrial (MVPD-MV-I) Multiple Use (MVPD-MV-M) 	<p>Specific Plan (MVPD-MV-M/SP)</p> <ul style="list-style-type: none"> Residential (MVPD-MVR-1) Residential (MVPD-MVR-2) Residential (MVPD-MVR-3) Residential (MVPD-MVR-4) Residential (MVPD-MVR-5) 	<p><small>This map/data is provided without warranty of any kind, either express or implied, including but not limited to, the implied warranties of merchantability and fitness for a particular purpose. Note: This product may contain information from the SANDAG Regional Information System which cannot be reproduced without the written permission of SANDAG. This product may contain information reproduced with permission granted by RAND McNALLY & COMPANY to SanGIS. This map is copyrighted by RAND McNALLY & COMPANY. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without the prior, written permission of RAND McNALLY & COMPANY.</small></p> <p><small>Copyright SanGIS 2009 - All Rights Reserved. Full text of this legal notice can be found at: http://www.sangis.org/Legal_Notice.htm</small></p>
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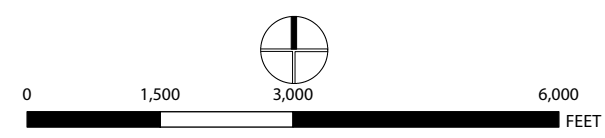
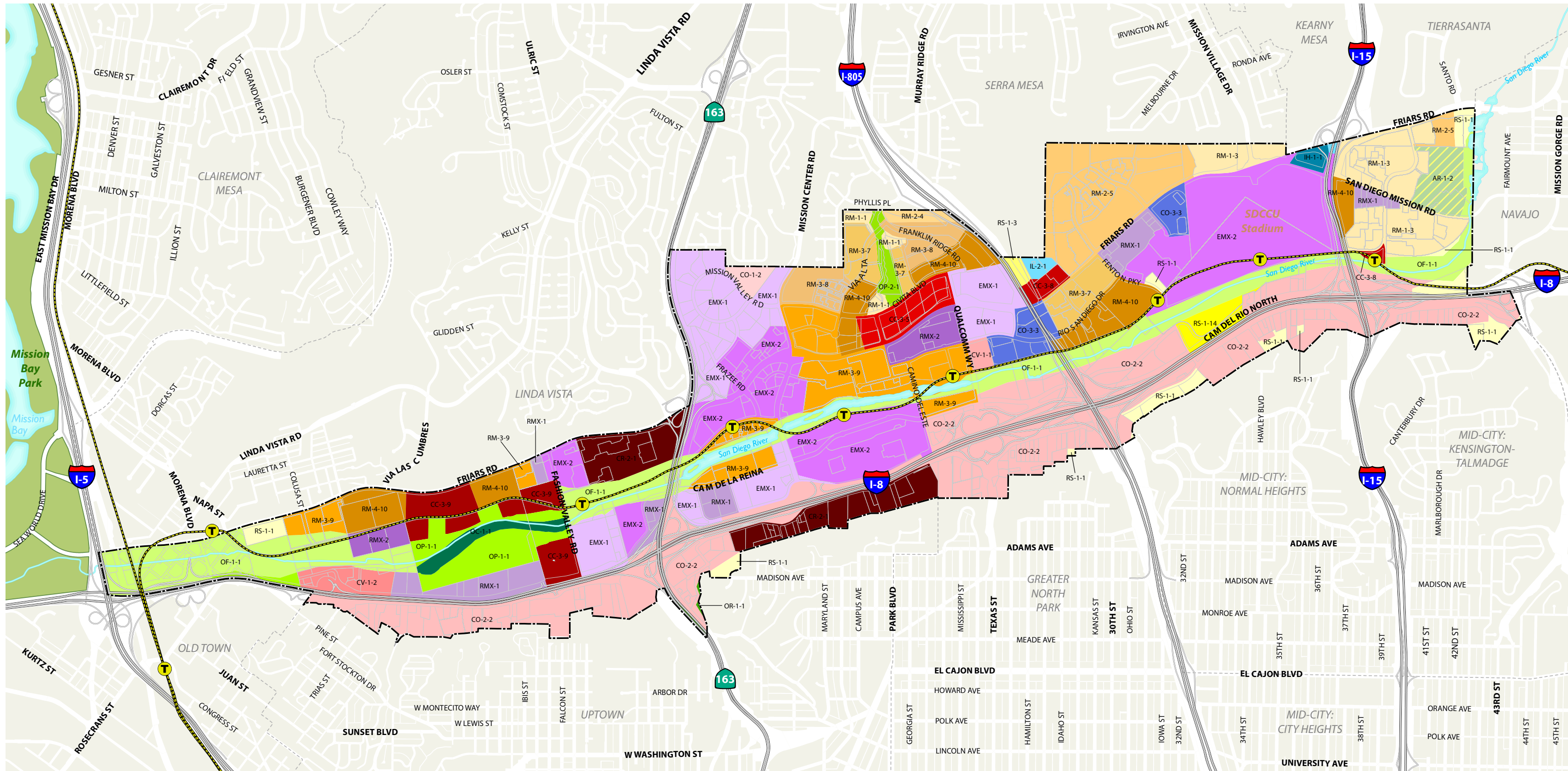


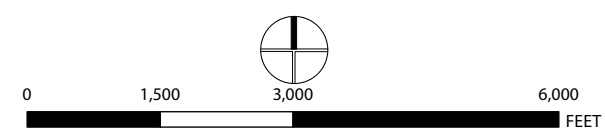
Figure 3.3-3: Proposed Zoning



Mission Valley Community Plan Boundary	Open Space - Conservation (OC-1-1)	Residential - Multiple Unit (RM-1-3)	Commercial	Commercial - Community (CC-3-8)	Other
Agriculture/Open Space	Agricultural - Residential (AR-1-2)	Residential - Multiple Unit (RM-2-4)	Commercial - Office (CO-1-2)	Commercial - Community (CC-3-9)	RMX-1
Open Space - Floodplain (OF-1-1)	Residential	Residential - Multiple Unit (RM-2-5)	Commercial - Office (CO-2-2)	Commercial - Regional (CR-2-1)	RMX-2
Open Space - Park (OP-1-1)	Residential - Single Unit (RS-1-1)	Residential - Multiple Unit (RM-3-7)	Commercial - Office (CO-3-3)	Industrial - Light (IL-2-1)	EMX-1
Open Space - Park (OP-2-1)	Residential - Single Unit (RS-1-3)	Residential - Multiple Unit (RM-3-8)	Commercial - Visitor (CV-1-1)	Industrial - Heavy (IH-1-1)	EMX-2
Open Space - Residential (OR-1-1)	Residential - Single Unit (RS-1-14)	Residential - Multiple Unit (RM-3-9)	Commercial - Visitor (CV-1-2)		
	Residential - Multiple Unit (RM-1-1)	Residential - Multiple Unit (RM-4-10)	Commercial - Community (CC-3-5)		

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3.3.5 POLICIES FOR DEVELOPMENT

Community Plan Implementation Overlay Zones (CPIOZs)

CPIOZs are a tool to provide supplemental development regulations that are tailored to specific sites within Community Planning Areas of the city. The proposed CPU includes two CPIOZs for portions of the CPU area: the Hillside Conservation, Design, and Height Limitation CPIOZ and the San Diego River Subdistrict CPIOZ. Both areas are designated as CPIOZ-Type A. In the areas designated as CPIOZ-Type A, development that is consistent with the Community Plan, the base zone regulations, and the supplemental development regulations identified in each CPIOZ section can be processed ministerially in accordance with the procedures of the CPIOZ. Any development that does not comply with the Community Plan, the base zone regulations, or any of the supplemental development regulations identified in the CPIOZ section is required to obtain a discretionary permit. Standards included as CPIOZ regulations in the proposed CPU currently exist within Chapter 15, Article 14 of the SDMC, Mission Valley Planned District Ordinance. If the proposed CPU is adopted, the Mission Valley Planned District Ordinance regulations would be removed and the CPIOZ standards would go into effect.

Policies for Development

The proposed CPU includes a series of policies for future development that provide guidance to developers and decision-makers for determining whether or not future development is consistent with the proposed CPU's Vision and design guidelines. The policies cover topics such as blocks and lots, streetscapes, building placement and orientation, building form and design, residential development, commercial development, mixed-use development, institutional development, open space protection, green building practices, tribal cultural and archaeological resources, historic buildings, mobility, parks and open space development, emergency access and incident prevention, noise, hazards, smart city strategies, and area-specific development.

3.4 Buildout Under the Proposed CPU

3.4.1 BUILDOUT PROJECTIONS

This section provides a quantification of the future population, housing units, and jobs that could result from buildout of the proposed CPU. The term "buildout" refers to the future scenario in which the proposed CPU is fully implemented. The buildout scenario provides estimates as to the number of new housing units, residents, non-residential square feet, and jobs in Mission Valley. Buildout projections have been developed in order to allow for an evaluation of the "reasonably foreseeable" direct and indirect impacts of the proposed CPU, as required under CEQA, and are used for analytical purposes throughout the PEIR. Table 3.4-1 summarizes buildout projections for the CPU.

Table 3.4-1: Buildout Summary

	<i>Base Year (2012)</i>	<i>Buildout (2050)</i>	<i>Net Increase</i>	<i>Percent Change</i>
Housing Units	11,240	39,160	27,910	248%
Single-Family	<5	<5	0	0%
Multi-Family	11,240	39,160	27,910	248%
Household Population	20,800	72,400	51,600	248%
Non-Residential Square Feet	17,667,000	25,038,000	7,371,000	42%
Commercial/Retail	5,231,350	7,244,347	2,012,997	38%
Office	7,418,523	12,087,208	4,668,685	63%
Motel/Hotel	3,648,880	4,406,391	757,511	25%
Industrial	603,210	120,711	(482,499)	(80%)
Institutional/Community Facilities	158,839	195,358	36,519	23%
Hospital/Clinic	67,223	42,803	(24,420)	(36%)
University and other colleges	247,577	189,163	(58,414)	(24%)
Schools K to 12	96,200	105,650	9,450	10%
Recreational	195,181	646,278	495,097	231%
Employment	45,600	64,700	19,100	42%

Note: Numbers may not sum due to rounding. Total and multi-family housing are rounded to the nearest 10; the single-family unit is not rounded. Duplexes and triplexes are counted as multi-family housing. Population and employment are rounded to the nearest 100. Non-residential square feet are rounded to the nearest 1,000.

Sources: Dyett & Bhatia, 2018; City of San Diego, 2018.

As shown, the proposed CPU is projected to result in a 248 percent increase in population in the CPU area over 2012 conditions. The buildout population takes into consideration the number of housing units estimated in 2012, as well as new units projected in the CPU area in 2050. The 2050 population projection assumes 1.85 persons per household. The total number of future jobs was calculated based on jobs-per-square-foot assumptions for retail/restaurant, hotel, and office jobs. The proposed CPU is projected to result in a 42 percent increase in jobs over 2012 conditions. The methodology used to calculate buildout is included in Appendix B of this PEIR.

3.4.2 PHASING

It is assumed that buildout of the CPU would occur incrementally over a 30-year planning horizon. The CPU does not specify or anticipate when buildout will actually occur. The timeline and buildout scenario will likely vary, because actual development will be determined by a number of factors, including market conditions, site constraints, land availability, and property owner interest. Requirements of the proposed CPU and of applicable zoning (such as required setbacks or height limits) may also limit development below the stated maximum density or intensity allowable under the proposed CPU land use designations.

3.5 Proposed CPU Implementation

3.5.1 PROPOSED CPU ADOPTION

As discussed in Chapter 1: Introduction, following public review of this Draft PEIR, the City will produce a Final PEIR for certification. The Final PEIR will be considered in public hearings with the Planning Commission; if the Planning Commission finds the Final PEIR to be satisfactory, it may recommend that the Final PEIR be considered by the City Council. By certifying the Final PEIR, the City Council would be stating that (CEQA Guidelines Section 15090):

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the City Council and that the City Council reviewed and considered the information contained in the Final EIR prior to approving the Plan; and
- The Final EIR reflects the City Council’s independent judgment and analysis.

Table 3.5-1: Project Components

Adoption of the Mission Valley Community Plan Update
Adoption of amendments to the General Plan to incorporate the Community Plan
Rezone land within the Mission Valley community consistent with the Community Plan
Amendment to the San Diego Municipal Code to amend Chapter 15, Article 14 repealing the Mission Valley Planned District Ordinance
Amendment to the San Diego Municipal Code to amend Ch 13, Article 2 related to the Community Plan Implementation Overlay Zone to add a CPIOZ type A for Mission Valley

Prior to adopting the proposed CPU, CEQA requires the City to make written findings for each significant environmental effect identified in the certified PEIR, including any mitigation measures identified in the PEIR, and adopt certain findings and a statement of overriding considerations regarding the specific reasons to support its action in light of any potential significant impacts (CEQA Guidelines sections 15091 and 15092). If these requirements are met, the City may adopt the proposed CPU. Additional discretionary hearings with the Planning Commission and/or City Council may be required over the planning horizon in order to complete individual implementing actions and to approve future development under the proposed CPU.

3.5.2 RESPONSIBLE AGENCIES

This PEIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed CPU and determine corresponding mitigation measures as necessary. This Draft PEIR is also being prepared to address various actions by the City of San Diego and others needed to adopt and implement the proposed CPU. It is the intent of the Draft PEIR to enable the City of San Diego, other responsible agencies, and interested parties to evaluate the environmental impacts of the proposed CPU, thereby enabling them to make informed decisions with respect to the requested entitlements.

Policy and Regulatory Implementation

The City will use a range of regulatory mechanisms and administrative procedures to implement the proposed CPU, including amendments or updates to the following:

- The San Diego General Plan;
- The SDMC and Official Zoning Map;
- Amendments to existing development agreements; and
- Other plans and regulatory documents, including, but not limited to, the San Diego Association of Government's (SANDAG's) The Regional Plan; the City's Pedestrian Master Plan; the City's Bicycle Master Plan; the City's Traffic Signal Communications Master Plan; and the Urban Water Management Plan.

3.6 Future Actions Associated with the Proposed CPU

Due to a lack of site-specific development proposals associated with the proposed CPU, site-specific environmental analyses of future development anticipated within the proposed CPU area are not undertaken within this PEIR. However, the analysis anticipates that future development would occur within the CPU area and would be subject to applicable development regulations and requirements of the proposed CPU and this PEIR. Future development within the CPU area would involve subsequent approval of public and private development proposals through both ministerial and discretionary reviews in accordance with the zoning and development regulations, and proposed CPU implementing actions and policies. These subsequent activities may be public (i.e., road/streetscape improvements, parks, public facilities) or private projects, and are referred to as "future development" or "future projects" in the text of the PEIR.

A non-exhaustive list of discretionary actions that would occur as the proposed CPU is implemented include the following:

- City of San Diego
 - Subdivision maps
 - Site Development Permits
 - Establishment of public facilities financing mechanisms
 - Coastal Development Permits
 - Conditional Use Permits
 - Neighborhood Development Permits
 - Neighborhood Use Permits
 - Planned Development Permits
 - Variances

- Street vacations, release of irrevocable offers of dedication, and dedications
- Water, sewer, and storm drain infrastructure and road improvements (public right-of-way permits)
- Specific Plans (~~e.g. the future Specific Plan for the Stadium site~~)
- State of California
 - California Department of Transportation (Caltrans) encroachment permits
 - Water Quality Certification Determinations for Compliance with Section 401 of the Clean Water Act
- Federal Actions
 - U.S. Army Corps of Engineers Section 404 permits
 - U.S. Fish and Wildlife Service Section 7 or 10(a) permits
- Other Agencies
 - San Diego Gas & Electric (SDG&E)/Public Utilities Commission approvals of power line relocations or undergrounding
 - Board of Trustees of the California State University adoption of the San Diego State University Mission Valley Campus Master Plan (a future Specific Plan for the Stadium site), including certification of an EIR.

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4 Environmental Analysis

Overview

Sections 4.1 through 4.14 analyze the potential environmental impacts that may occur as a result of implementation of the proposed CPU. The environmental issues analyzed in the following sections include those that were identified by the City as potentially significant in response to the Notice of Preparation (NOP). There are 14 environmental issues addressed in the following sections. A brief discussion of additional impacts that were determined not to be potentially significant is included in Chapter 5: CEQA Required Conclusions. The environmental topics addressed are as follows:

- 4.1 Air Quality
- 4.2 Biological Resources
- 4.3 Geology, Soils, and Seismicity
- 4.4 Greenhouse Gas Emissions and Energy
- 4.5 Hazards and Hazardous Materials
- 4.6 Historical, Cultural, and Tribal Cultural Resources
- 4.7 Hydrology and Water Quality
- 4.8 Land Use
- 4.9 Noise
- 4.10 Paleontological Resources
- 4.11 Public Services and Facilities
- 4.12 Public Utilities and Infrastructure
- 4.13 Transportation
- 4.14 Visual Effects and Neighborhood Character

Programmatic impacts are discussed in broad, qualitative terms. Individual projects implemented under the proposed CPU would be assessed at the time they are proposed to determine whether additional environmental review is warranted in accordance with CEQA.

Impacts Considered

According to the California Environmental Quality Act (CEQA) Guidelines, the following general types of environmental impacts must be considered in this Program Environmental Impact Report (PEIR):

- **Direct or primary impacts**, which are caused by the project and occur at the same time and place as the project.
- **Indirect or secondary impacts**, which are caused by the project and occur later in time or farther removed in distance but are still reasonably foreseeable. Indirect or secondary impacts may include growth-inducing impacts and other impacts related to induced changes in the pattern of land use, population density, or growth rate, and related impacts on air and water and other natural systems, including ecosystems. Indirect or secondary impacts may also include cumulative impacts.
- **Short-term impacts**, which are those of a limited duration, such as the impacts that would occur during the construction phase of a project.
- **Long-term impacts**, which are those of greater duration, including those that would endure for the life of a project and beyond.
- **Significant unavoidable impacts**, which cannot be mitigated to a less than significant level.
- **Cumulative impacts**, which include two or more individual impacts that when considered together are considerable or which compound or increase other adverse environmental effects. The individual impacts may be changes resulting from a single project or a program of projects. The cumulative effect from several projects is the change in the environment that results from the incremental effect of the proposed CPU when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time. Cumulative impacts are addressed in Chapter 5.
- **Irreversible environmental changes**, which may include current or future irretrievable commitments to using non-renewable resources, or growth-inducing impacts that commit future generations to similar irretrievable commitments of resources. Such changes are addressed in Chapter 5.

Organization

Each section is formatted to include a summary of the existing conditions, including regulatory context; the criteria for determining the significance for each impact; an evaluation of potential project impacts; a mitigation framework, if applicable; and a conclusion of significance after mitigation for impacts identified as significant. The goals, policies, and implementation programs of the proposed CPU that are relevant to potential environmental impacts are documented.

Determining Level of Significance

For each potential environmental impact identified in this PEIR, a statement of the level of significance of the impact is provided. Impacts are assessed as one of the following categories:

The term “no impact” is used when the environmental resource being discussed would not be adversely affected by implementation of the proposed CPU. This impact level does not require mitigation.

A “less than significant” impact would cause a minor change in the physical environment, but the impact would not meet or exceed the significance threshold. This impact level does not require mitigation under CEQA.

An impact that is “less than significant with mitigation” would have a substantial adverse effect on the physical environment but can be reduced to a less-than-significant level with mitigation. Under CEQA, mitigation measures must be provided, where feasible, to reduce the magnitude of significant or potentially significant impacts.

A “significant and unavoidable” impact would cause a substantial adverse effect on the environment, and no known feasible mitigation measures are available to reduce the impact to a less than significant level. Under CEQA, a project with significant and unavoidable impacts may be approved, but the lead agency (in this case, the City) must prepare a “statement of overriding considerations” in accordance with Section 15093 of the CEQA Guidelines explaining how the benefits of the project outweigh the potential for significant impacts.

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4.1 Air Quality

An Air Quality Analysis (RECON Environmental, 2018) was prepared which addresses air quality impacts associated with the proposed CPU (Appendix C). The analysis in this section is based on the methodology recommended by the San Diego Air Pollution Control District (SDAPCD) and is based on buildout of the proposed CPU, as modeled using the California Emissions Estimator Model (CalEEMod), the California Air Resources Board (CARB) Emissions Factor model, and vehicle miles traveled (VMT) provided in the Transportation Impact Analysis by Chen Ryan Associates (Appendix D).

4.1.1 Environmental Setting

4.1.1.1 PHYSICAL SETTING

The CPU area is located within the San Diego Air Basin (SDAB). The existing environmental setting in the SDAB is summarized in the Air Quality Analysis (Appendix C).

4.1.1.2 REGULATORY SETTING

“Air pollution” is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health, reduce visibility, and damage our natural environment. The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (USEPA) to set Ambient Air Quality Standards (AAQS) for six common pollutants, known as criteria pollutants. The pollutants regulated as criteria pollutants are: ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead, and particulate matter (PM₁₀ and PM_{2.5}).

Motor vehicles are San Diego County’s leading source of air pollution (SDAPCD, 2016). Other mobile sources include construction equipment, trains, and airplanes. Emission standards for mobile sources are established by CARB at the State level and by USEPA at the federal level. Reducing mobile source emissions requires the technological improvement of existing mobile sources (e.g., retrofitting older vehicles with cleaner emissions technologies) and the examination of cleaner fuels and technologies in the development of future mobile sources. The State of California has developed statewide programs to encourage cleaner cars and cleaner fuels. The regulatory framework described below summarizes the federal and State agencies responsible for monitoring and controlling mobile source air pollutants and the measures currently being taken to achieve and maintain healthful air quality.

In addition to mobile sources, stationary sources also contribute to air pollution. Stationary sources are regulated by the SDAPCD and include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses.

Federal Regulations

AAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal CAA was enacted in 1970 and amended in 1977 and 1990 (42 United States Code [USC] 7401) for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the USEPA developed primary and secondary National Ambient Air Quality Standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone, CO, SO₂, NO₂, lead, and PM. The primary NAAQS "...in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health..." and the secondary standards "...protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 4.1-1 (CARB, 2016).

An air basin is designated as either attainment or non-attainment for a particular pollutant; non-attainment areas may be further classified as marginal, moderate, serious, severe, or extreme non-attainment area. States are required to adopt enforceable plans, known as State Implementation Plans (SIPs), to achieve and maintain air quality meeting the NAAQS. State plans must also control emissions that drift across state lines and harm air quality in downwind states. Once a non-attainment area has achieved the NAAQS for a particular pollutant, it is redesignated as an attainment area for that pollutant. To be redesignated, the area must meet air quality standards for three consecutive years. After redesignation to attainment, the area is known as a maintenance area and must develop a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the CAA. The SDAB is a non-attainment area for the federal ozone standards.

Table 4.1-1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		–		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12 µg/m ³	15 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m ³)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		–	–	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemi- luminescence	100 ppb (188 µg/m ³)	–	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	–	Ultraviolet Fluorescence; Spectro- photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹¹	–	

Table 4.1-1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) ¹¹	–	
Lead ^{12,13}	30 Day Average	1.5 µg/m ³	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

Notes:

ppm = parts per million; ppb = parts per billion; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; mg/m^3 = milligram per cubic meter; – = not applicable.

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM_{10} , $\text{PM}_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10} , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than one. For $\text{PM}_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration is expressed first in the units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius ($^{\circ}\text{C}$) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual $\text{PM}_{2.5}$ primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour $\text{PM}_{2.5}$ standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standards of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM_{10} standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of ppb. California standards are in units of ppm. To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Table 4.1-1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
<p>Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.</p> <p>12. CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.</p> <p>13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.</p> <p>14. In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.</p>						

Source: CARB, 2016.

State Regulations

Criteria Pollutants

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code [H&SC] Section 39000 et seq.). Under the CCAA, CARB has developed the California Ambient Air Quality Standards (CAAQS) and generally has set more stringent limits on the criteria pollutants than the NAAQS (Table 4.1-1). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Similar to the federal CAA, the State classifies "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the CAAQS. The SDAB is a non-attainment area for the State ozone, PM₁₀, and PM_{2.5} standards.

State Implementation Plan

The SIP is a collection of documents that set forth the State's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under the State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220.

The SDAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SIP plans for San Diego County specifically include the Redesignation Request and

Maintenance Plan for the 1997 National Ozone Standard for San Diego County (2012), and the 2004 Revision to the California State Implementation Plan for Carbon Monoxide–Updated Maintenance Plan for Ten Federal Planning Areas.

Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: H&SC sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999) requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through the SDAPCD's Regulation XII.

Of particular concern statewide are diesel-exhaust particulate matter emissions (DPM). DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants program.

Following the identification of DPM as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from DPM. The overall strategy for achieving these reductions is found in the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (CARB, 2000). A stated goal of the plan is to reduce the statewide cancer risk arising from exposure to DPM by 85 percent by 2020.

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB, 2005). The handbook's recommendations are directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). The handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. The CARB guidelines indicate that siting new sensitive land uses within 500 feet

of a freeway or an urban road with 100,000 or more vehicles per day should be avoided when possible. Within the CPU area, only the freeways (Interstate [I-] 5, I-8, I-805, and I-15, and State Route [SR-] 163) currently carry 100,000 or more vehicles per day.

According to the studies used to support the advisory distances, the freeways used in the handbook analysis were I-405 and I-710, both in Los Angeles and both with volumes of over 200,000 vehicles per day along the segments studied. Actual air emissions and concentration levels are more nuanced and varied in the CPU area and depend on local factors such as traffic volumes, wind speed and direction, and meteorological conditions. The handbook recommendations are designed to fill a gap where area-specific information is not available.

Local Regulations

Regional Air Quality Strategy

The SDAPCD is the agency that regulates air quality in the SDAB. The SDAPCD prepared the Regional Air Quality Strategy (RAQS) to address State requirements, pursuant to the CCAA of 1988 (H&SC Section 39000 et seq.). The CCAA requires areas that are designated non-attainment of CAAQS for ozone, CO, SO₂, or NO₂ to prepare and implement State plans to attain the standards by the earliest practicable date (H&SC Section 40911(a)). With the exception of State ozone standards, each of these standards has been attained in the SDAB (SDAPCD, 2016).

Included in the RAQS are the Transportation Control Measures (TCMs) prepared by the San Diego Association of Governments (SANDAG) that control emissions from mobile sources (SDAPCD, 2016). The RAQS and TCM set forth the steps needed to accomplish attainment of the CAAQS for ozone. The most recent update of the RAQS and corresponding TCMs were adopted in 2016.

SPAPCD Rule 51 (Nuisance)

SDAPCD Rule 51 prohibits emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a “considerable” number of persons or businesses in the area will be considered to be a significant, adverse odor impact.

City of San Diego Municipal Code

The City’s Off-Site Development Impact Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 2, Division 7) are intended to provide standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. The division applies to all development that produces air contaminants, noise, electrical/radioactivity disturbance, glare, or lighting in any zone. Section 142.0710 establishes that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

4.1.2 Impact Analysis

4.1.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G, the City's Significance Determination Thresholds (2016), and applicable Air District standards described below, which have been modified to guide a programmatic analysis for the proposed CPU. A significant impact could occur if implementation of the proposed CPU would:

- 1) Conflict with or obstruct the implementation of the applicable air quality plan;
- 2) Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- 3) Expose sensitive receptors to substantial pollutant concentrations, including toxins; or
- 4) Create objectionable odors affecting a substantial number of people.

4.1.2.2 METHODOLOGY AND ASSUMPTIONS

Air Quality Plans

Regarding criterion 1, above, the CAA and the CCAA require air basins that are designated in non-attainment of the State AAQS for criteria pollutants to prepare and implement plans to attain the standards by the earliest practicable date. The air quality plan for the SDAB is the San Diego RAQS. The two pollutants addressed in the RAQS are reactive organic gas (ROG) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the TCMs, were most recently adopted in 2016 as the air quality plan for the SDAB.

The basis for the mobile source emission estimates in the RAQS is the distribution of population in the region as projected by SANDAG. The SDAPCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that are consistent with the General Plan and the assumptions used in the development of the RAQS would not conflict with or obstruct attainment of the air quality levels, which would help the region achieve the AAQS. Projects that propose development at an intensity equal to or less than population growth projections and land use intensity are inherently consistent. Since the focus of the RAQS is on emissions, amending the adopted Mission Valley Community Plan to change the allowable land use development would require further analysis to determine consistency with RAQS and the SIP. Consistency with the RAQS is further evaluated by calculating the increase in emissions. Whether the increase from the existing condition is significant is analyzed by comparing emissions that would occur under buildout of the adopted Community Plan to the emissions that would occur under buildout of

the proposed CPU since the emissions under the adopted Community Plan are accounted for in the RAQS.

Air Quality Standards

Regarding criterion 2 above, the SDAPCD has established trigger levels that determine when a new or modified stationary source would require an air quality analysis. These trigger levels are utilized by the City in its CEQA Significance Determination Thresholds (City of San Diego, 2016) as a consideration when determining the potential significance of air quality impacts for projects within the City. These thresholds would be applicable to future, individual development projects implemented within the CPU area. The air quality impact screening levels are shown in Table 4.1-2.

These project-level thresholds are intended to ensure individual projects would not obstruct the timely attainment of the NAAQS and the CAAQS. Generally, program-level planning activities, such as the proposed CPU, general plans, Community Plans, and Specific Plans, are evaluated for consistency with the local air quality plans as a measure of significance.

Table 4.1-2: Air Quality Impact Screening Levels

Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
NO _x	25	250	40
SO _x	25	250	40
CO	100	550	100
PM ₁₀	--	100	15
Lead	--	3.2	0.6
VOC, ROG	--	137	15
PM _{2.5} ^a	--	67	10

Notes:

a. SDAPCD Resolution 16-041 was adopted on April 27, 2016. It amended Rules 20.1, 20.2, and 20.3 to include a trigger level for PM_{2.5}. The City's significance thresholds have not been updated to reflect this amendment.

SO_x = sulfur oxide; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 microns; VOC = volatile organic compounds; PM_{2.5} = particulate matter less than 2.5 microns in diameter.

Source: City of San Diego, 2016.

Sensitive Receptors

Analysis of criterion 3 includes an analysis of CO hot spots and exposure to toxic air emissions.

Localized Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate State and federal CO standards at intersections, even if the broader basin is in attainment for federal and State levels. Although the SDAB is currently an attainment/maintenance area for CO, exhaust emissions can potentially cause a direct, localized hot spot impact at or near proposed development. Because increased CO concentrations are usually associated with roadways that are congested and with heavy traffic volumes, many agencies have established preliminary screening criteria to determine whether project-generated, long-term operational local mobile-source emissions of CO would result in, or substantially contribute to, emissions concentrations that exceed the State's 1-hour ambient air quality standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm. The analysis of CO hot spots is based on the Transportation Impact Analysis which analyzed the Level of Service (LOS) for the proposed CPU (Appendix D).

Toxic Air Emissions

For SDAPCD-permitted stationary projects, the SDAPCD does not identify a significant impact if the potential health risks from the project would not exceed the health risk public notification thresholds specified by SDAPCD Rule 1210.

For operational impacts, the analysis considers whether the proposed CPU would be consistent with the recommendations of CARB's Air Quality and Land Use Handbook: A Community Health Perspective, which provides guidance on land use compatibility with sources of TACs (CARB, 2005). The handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help protect children and other sensitive members of the population.

Odor

Regarding criterion 4 above, two situations increase the potential for odor problems. The first occurs when a new odor source is located near existing receptors. The second occurs when new receptors are developed near existing sources of odor. SDAPCD Rule 51 (Nuisance) prohibits the emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from the SDAPCD, typically industrial and some commercial projects, are evaluated by SDAPCD staff for potential odor nuisance and conditions, where necessary, to prevent the occurrence of public nuisance.

The occurrence and severity of odor impacts depends on numerous factors including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant,

leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

4.1.2.3 IMPACTS

Impact 4.1-1: Conflicts with Air Quality Plans

Would the proposed CPU conflict with or obstruct implementation of the applicable air quality plan?

Projects that are consistent with the assumptions and emission forecasts used in the development of the applicable air quality plan are considered to not conflict with or obstruct the attainment of the air quality levels identified in the plan. Emissions forecasts rely on projections of VMT by the Metropolitan Planning Organizations, such as SANDAG, and population, employment, and land use projections made by local jurisdictions during development of the area and general plans. While the RAQS acknowledges mobile and area sources, minor changes in the assumptions relative to these sources would not obstruct successful implementation of the strategies for improvement of the SDAB's air quality.

The proposed CPU would increase the number of multi-family residential units and the amount of commercial/retail, office, institutional/community facilities, and recreational uses in the CPU area, while decreasing the amount of hotel/motel, industrial, medical office/clinic, and university uses. Overall, the proposed CPU would increase the residential, commercial, retail development potential within the CPU area. This supports the General Plan's City of Villages strategy to focus growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. Implementation of this strategy can decrease VMT and reduce mobile emissions. The proposed CPU's policies, implementing actions, and design guidelines support General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, improved connections to transit, and sustainable development and green building practices. The proposed CPU would be consistent with the SDAPCD's regional goals of providing infill housing, improving the balance between jobs and housing, and integrating land uses near major transportation corridors.

However, because the proposed CPU would result in greater density, future emissions associated with buildout of the proposed CPU would be greater than future emissions associated with buildout of the adopted Community Plan land uses. Additionally, the future VMT associated with buildout of the proposed CPU would be greater than the VMT associated with buildout of the adopted Community Plan, thereby resulting in greater mobile source emissions. Therefore, emissions of ozone precursors (ROG and NO_x) would be greater than what is accounted for in the RAQS. Thus, the proposed CPU would conflict with implementation of the RAQS and could have a potentially significant impact on regional air quality. Mitigation Measure MM-AQ-1 below is provided to reduce any potential significant impact of the proposed CPU; however, as the effectiveness of the measure cannot be guaranteed at this time, the impact would be considered significant and unavoidable.

Mitigation Measures

Mitigation Measure MM-AQ-1 would help reduce the significant potential impacts related to conflicts with the applicable air quality plans.

MM-AQ-1 Within six months of the certification of the Final PEIR, the City shall provide a revised land use map for the CPU area to SANDAG to ensure that any revisions to the population and employment projections used by the SDAPCD in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed CPU.

MM-AQ-1 would reduce significant impacts of the proposed CPU by requiring the City to provide the information needed to update the RAQS and the SIP. However, as updates to the air quality plans are within the SDAPCD's jurisdiction, the effectiveness of this mitigation measure cannot be guaranteed at this time. The impact would remain significant and unavoidable.

Impact 4.1-2: Air Quality Standards

Would the proposed CPU result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Air quality impacts can result from the construction and operation of a project. Construction impacts are short-term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. In the case of the proposed CPU, operational impacts are primarily due to emissions from mobile sources associated with the vehicular travel along the roadways. Construction and operational impacts of the proposed CPU are discussed below.

Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Approval of the proposed CPU would not specifically permit the construction of an individual project, and no specific development details are available at this program level of analysis. However, in order to assess the potential for future development within the CPU area to result in a significant air quality impact during construction, two hypothetical projects were evaluated that represent a typical construction emissions scenario and a worst-case construction emissions scenario that could occur within the CPU area. The information is presented to illustrate the potential scope of

air impacts for projects that could be reviewed under the proposed CPU. It should be noted that air quality emissions associated with construction activities are evaluated differently from greenhouse gas (GHG) emissions (Section 4.4: Greenhouse Gas Emissions and Energy), because GHG emissions impacts are cumulative in nature. There are no localized impacts associated with GHG emissions as impacts are a phenomenon affecting the global climate. Air quality emissions, on the other hand, can create localized air quality impacts that warrant project-level evaluation based on potential construction scenarios that could occur within the CPU area.

To illustrate the potential construction-related air quality impacts from projects that could occur throughout the CPU area, two hypothetical projects were evaluated. The first hypothetical project analyzed was a 5-acre mixed-use development consisting of the demolition of a 20,000-square-foot structure and the construction of 300 multi-family residential units and 10,000 square feet of retail uses. This represents a typical project that could be constructed in the CPU area. The second hypothetical project analyzed, which represented a worst-case analysis in terms of construction emissions that could occur within the CPU area, was the redevelopment of the 233-acre stadium site with a large mixed-use project, such as a Specific Plan, consisting of 5,000 multi-family units, one million square feet of retail space, two million square feet of office space, a 50-acre park, and a 40,000-seat stadium.¹ This project would include the demolition of the existing stadium. This project represents a worst-case scenario for construction emissions because communitywide, there would be no potential construction projects (either individual or combined) that would exceed the level of construction activity associated with redevelopment of the stadium site. Construction emissions associated with demolition of the existing stadium were obtained from previous studies prepared for the site. All other construction emissions associated with these two hypothetical projects were calculated using California Emissions Estimator Model 2016.3.2 (California Air Pollution Control Officers [CAPCOA], 2017).

A summary of the construction emissions associated with construction of a 5-acre mixed-use project is provided in Table 4.1-3. As shown, the hypothetical 5-acre mixed-use project would not result in air emissions that would exceed applicable thresholds. However, if several of these types of projects were to occur simultaneously, implementation of the proposed CPU could exceed the significance thresholds.

The second hypothetical project analyzed was the demolition of the existing stadium and the redevelopment of the stadium site with 5,000 multi-family units, one million square feet of retail space, two million square feet of office space, a 50-acre park, and a 40,000-seat stadium. A project of this size would likely be constructed in multiple phases. Emissions due to demolition of the existing stadium were obtained from the Air Quality Technical Study prepared for the Stadium Reconstruction Project (AECOM, 2015). The results are summarized in Table 4.1-4.

¹ For the Mobility analysis, the proposed CPU assumed that 4,800 dwelling units, two million square feet of office space, 300,000 square feet of retail space, 450 hotel rooms, 38.1 acres of active park, and 4.9 acres of open space, and a 40,000-seat stadium would be developed on the Stadium site. The future Specific Plan for the Stadium site will provide more site-specific development details.

Table 4.1-3: Construction Emissions--5-acre Mixed-Use Project

Construction Phase	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition	4	40	23	0	3	2
Site Preparation	5	48	23	0	21	12
Grading	3	31	17	0	8	5
Building Construction	4	29	26	0	4	2
Paving	2	15	15	0	1	1
Architectural Coating	38	2	3	0	0	0
Maximum Daily Emissions	38	48	26	0	21	12
<i>Significance Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Source: RECON, 2019.

Table 4.1-4: Stadium Demolition Emissions

Demolition Phase	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>Unmitigated Demolition Emissions</i>						
Abatement	4	32	30	0	2	1
Salvage	8	81	57	0	3	3
Preparation and Implosion	53	624	387	1	128	36
Remove and Sort Debris	45	528	281	1	20	18
Unmitigated Maximum Daily Emissions	53	624	387	1	128	36
<i>Mitigated Demolition Emissions</i>						
Abatement	1	10	24	0	0	0
Salvage	2	25	79	0	1	0
Preparation and Implosion	18	184	468	1	50	11
Remove and Sort Debris	10	88	362	1	2	2
Mitigated Maximum Daily Emissions	18	184	362	1	2	2
<i>Significance Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Source: AECOM, 2015.

As shown, emissions due to demolition activities would exceed the project-level significance thresholds for NO_x and PM₁₀. Emissions could be reduced to less than significant with implementation of standard air quality construction BMPs. Such measures were included in the Air Quality Technical Study prepared for the Stadium Reconstruction Project (AECOM, 2015).

For a project that includes demolition of the existing stadium, implementation of Mitigation Measure MM-AQ-2 would ensure the reduction of demolition emissions to a level less than significant, as was demonstrated in the Air Quality Technical Study prepared for the Stadium Reconstruction Project.

Once stadium demolition is complete, construction emissions were modeled as occurring over five two-year phases, for a total construction period of 10 years. The maximum daily emissions that would occur during each year are summarized in Table 4.1-5.

As shown, with the exception of stadium demolition activities, construction of a stadium redevelopment project would not result in air emissions that would exceed the applicable thresholds. Because these worst-case construction emissions associated with the largest redevelopment project that could occur communitywide would be less than the project-level significance thresholds, there would be no potential construction projects that individually would exceed the project-level significance thresholds.

Table 4.1-5: Construction Emissions–Stadium Site Mixed-Use Project

Year	Pollutant (pounds per day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2020	82	234	277	1	69	24
2021	78	212	260	1	68	21
2022	76	197	245	1	68	26
2023	73	163	230	1	67	20
2024	72	158	219	1	67	25
2025	71	153	209	1	67	19
2026	70	150	201	1	67	25
2027	69	148	194	1	67	19
2028	68	146	188	1	67	25
2029	67	145	182	1	67	19
Maximum Daily Emissions	82	234	277	1	69	26
<i>Significance Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>

Source: RECON, 2019.

The exact number and timing of individual development projects that could occur as a result of implementation of the proposed CPU are unknown at this time. ~~Subsequent discretionary development projects would need to analyze specific construction related criteria air pollutant impacts to ensure that emissions remain below the SDAPCD thresholds. However, under the proposed CPU, ministerial projects that would not be subject to CEQA would also occur.~~

~~Ministerial projects are generally smaller in size than those requiring discretionary review and construction would be less intensive than the scenarios evaluated in this analysis. Federal, State, and local regulations would provide a framework for developing project-level air quality protection measures for future projects.~~ Nevertheless, due to the potential for significant growth in the CPU area, future development could exceed the SDAPCD screening thresholds; therefore, this impact is considered significant and unavoidable.

Operation

Operation emissions are long-term and include mobile and area sources. Sources of operational emissions associated with future projects developed under the proposed CPU include:

- Traffic generated by the project; and
- Area source emissions from the use of natural gas, fireplaces, and consumer products.

Air pollutants generated by all land uses within the CPU area were modeled based on average emissions from land use types. For the purposes of this analysis, it was assumed that the land use changes contained in the proposed CPU would be fully constructed in 2050. Actual emissions would vary depending on future projects and regulations within the CPU area.

Program-level air emissions would exceed the City's project-level thresholds; however, project-level standards are not appropriate for a program-level analysis, as the thresholds are conservative and intended to ensure that multiple simultaneous individual projects would not obstruct the timely attainment of the NAAQS and CAAQS. Generally, discretionary, program-level planning activities, such as general plans, Community Plans, Specific Plans, etc., are evaluated for consistency with the local air quality plan. In contrast, project-level thresholds are applied to individual project-specific approvals, such as a proposed development project. Therefore, the analysis of the proposed CPU is based on the future emissions estimates and determining whether the increased emissions are significant based on their relationship to attainment strategies derived from the adopted Community Plan.

At the program level, the analysis considers emissions from buildout of the proposed CPU in relation to the adopted Community Plan to determine if the emissions would exceed the emissions estimates included in the RAQS. If such an exceedance occurs, then the proposed CPU would obstruct attainment or result in an exceedance of the AAQS and could cause the temporary or permanent exposure of persons to unhealthy concentrations of pollutants. As such, the analysis evaluates the potential for future development within the CPU area to result in, or contribute to, a violation of any air quality standard, based on a comparison of the total change in pollutant emissions projected to result from buildout of the adopted Community Plan in the year 2050 to buildout of the proposed CPU in the year 2050, and determines whether the total change in emissions is significant.

Table 4.1-6 summarizes the estimated total maximum operational emissions for the proposed CPU by source. As shown, operational emissions associated with the proposed CPU would be greater for all pollutants when compared to the adopted Community Plan.

Table 4.1-6: Total Maximum Operational Emissions for the Mission Valley CPU Area

Condition	Source	Pollutant (pounds per day)					
		ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Adopted Community Plan	Area	1,304	368	2,056	2	39	39
	Energy	25	223	172	1	17	17
	Mobile	444	601	3,282	14	261	107
	Total	1,773	1,193	5,510	18	317	163
Proposed CPU	Area	1,948	622	3,468	4	65	65
	Energy	39	353	268	2	27	27
	Mobile	494	627	3,477	14	268	110
	Total	2,481	1,601	7,213	20	360	202
Total Change		708	409	1,703	3	43	39

Source: RECON, 2019.

The regulations at the federal, State, and local levels provide a framework for developing project-level air quality protection measures for future ~~discretionary~~ projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. However, it is possible that ~~for certain discretionary projects,~~ adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. ~~Ministerial projects would not be subject to further CEQA review.~~ Because operational emissions associated with buildout of the proposed CPU would be greater for all pollutants when compared to adopted land uses and the assumptions used to develop the RAQS, and because it is unknowable whether new development ~~there could be certain projects that~~ would not be able to reduce emissions below the thresholds, this impact would be significant and unavoidable.

Mitigation Measures

MM-AQ-2 Measures to reduce construction emissions shall be included in the specific plan for the stadium site and shall include, but not be limited to, the following:

- Equipment shall meet USEPA Tier 4 emission standards, as feasibly available.
- The construction contractor shall maintain and properly tune all construction equipment in accordance with manufacturer's specifications.
- The construction contractors shall minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.

- A blasting execution plan shall be developed and approved prior to any implosion event. This blasting execution plan shall evaluate the feasibility of staged implosion to minimize dust generation and exposure.
- A public notification program shall be instituted prior to the implosion event, which includes recommendations to minimize exposure to airborne dust.
- The implosion shall be scheduled during periods of low/no wind speeds.
- A dust control plan shall be developed to identify measures and equipment necessary to minimize dust from windblown storage piles, offsite tracking of dust, debris loading, truck hauling of debris, vehicle speed limits, and to identify other dust suppression measures.
- An ambient air quality monitoring program shall be implemented proximate to the stadium to measure actual particulate matter concentrations.

Implementation of MM-AQ-2 would reduce construction-related air quality impacts for any future stadium project. However, because operational emissions associated with buildout of the proposed CPU would be greater for all pollutants when compared to adopted land uses and the assumptions used to develop the RAQS, and because there could be certain projects that would not be able to reduce emissions below the thresholds, this impact would be significant and unavoidable.

Impact 4.1-3: Sensitive Receptors

Would the proposed CPU expose sensitive receptors to substantial pollutant concentrations, including toxins?

Localized Carbon Monoxide Hot Spots

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hot spots have the potential to violate State and federal CO standards at intersections, even if the broader basin is in attainment for federal and State levels. The California Department of Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) screening procedures have been utilized to determine if the project could potentially result in a CO hot spot (U.C. Davis Institute of Transportation Studies, 1997). As indicated by the CO Protocol, CO hot spots occur nearly exclusively at signalized intersections operating at LOS E or F. Accordingly, the CO Protocol recommends detailed air quality dispersion modeling for projects that may worsen traffic flow at any signalized intersections operating at LOS E or F.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District (SMAQMD) developed a screening threshold in 2011, which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In 2010, the Bay Area Air Quality Management District developed a screening threshold that states that any project involving an

intersection experiencing 44,000 vehicles per hour would require detailed analysis. This analysis conservatively assesses potential CO hot spots using the lower SMAQMD screening threshold of 31,600 vehicles per hour. Additionally, Sacramento and San Diego have the same federal and State CO attainment designations, and therefore experience similar CO concentrations; thus, these screening volumes are appropriate for evaluating CO impacts in the SDAB. This screening volume has also been utilized by the South Coast Air Quality Management District, which also has the same CO designation.

Based on the Transportation Impact Analysis prepared for the proposed CPU, the following signalized intersections were found to operate at LOS E or F during the AM or PM peak hour with buildout of the proposed CPU.

- I-5 Northbound Ramps/Sea World Drive/Tecolote Road–AM (LOS E)
- I-805 Southbound Ramps/Phyllis Place–PM (LOS E)
- I-805 Northbound Ramps/Phyllis Place–PM (LOS F)
- I-8 Westbound Ramps/Mission Valley Mall Driveway/Camino Del Rio North–PM (LOS E)
- Fashion Valley/Friars Road–PM (LOS E)
- Northside Drive/Friars Road–PM (LOS E)
- Mission Village Drive/Friars Road Westbound Ramps–PM (LOS F)
- Mission Village Drive/Friars Road Eastbound Ramps–AM (LOS E); PM (LOS F)
- I-15 Northbound Ramps/Friars Road–PM (LOS F)
- Mission Center Road/Camino De La Reina–PM (LOS E)
- Fairmount Avenue/Camino Del Rio North/ I-8 Westbound Off-ramp–PM (LOS F)
- Qualcomm Way/Camino Del Rio North/I-8 Westbound Ramps–AM (LOS E); PM (LOS F)
- Mission Center Road/I-8 Eastbound Ramps–PM (LOS E)
- Mission Center Road/Camino Del Rio South–PM (LOS E)
- Texas Street/Camino Del Rio South–AM (LOS E)
- Texas Street/Madison Avenue–AM (LOS F)
- Fashion Valley Road/Riverwalk Drive–PM (LOS F)

Peak hour turning volumes for these intersections were obtained from the Transportation Impact Analysis and compared to the SMAQMD screening threshold of 31,600 vehicles per hour. The intersection with the greatest peak hour volume would be the I-15 northbound ramps at Friars Road with a PM peak hour volume of 7,580 vehicles. Peak hour traffic volume at all intersections would be less than 31,600 vehicles per hour and thus, would not exceed the screening threshold. Therefore, the proposed CPU is not anticipated to result in a CO hot spot, and impacts would be less than significant.

Toxic Air Emissions

Construction

Construction of future projects and associated infrastructure implemented under the proposed CPU would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from project sites.

Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment, 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were a year, the exposure would be three percent of the total exposure period used for health risk calculation.

Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and at various locations over the lifetime of the proposed CPU, DPM generated by construction is not expected to create conditions where the probability is greater than 10 in 1 million of developing cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of USEPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types; the DPM emissions of individual equipment would be substantially reduced over the years as buildout continues. Therefore, impacts related to the exposure of sensitive receptors to toxic air emissions during construction of future projects within the CPU area would be less than significant.

Stationary Sources

The proposed CPU includes land uses that may generate air pollutants affecting adjacent sensitive land uses. In air quality terms, individual land uses that emit air pollutants in sufficient quantities are known as stationary sources. The primary concern with stationary sources is local; however, they also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources are regulated by the local air pollution control or management district through the issuance of permits; in this case, the agency is the SDAPCD.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with Assembly Bill 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Thus, with this regulatory framework, at

the program level, impacts related to the exposure of sensitive receptors to toxic air emissions associated with stationary sources in the CPU area would be less than significant.

Mobile Sources

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB, 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB Handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this study, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

I-8 travels east-west through the center of the CPU area, and I-15, I-805, SR-163, and I-5 travel north-south through and adjacent to the CPU area. Residential uses are currently located within 500 feet of these freeways, and future sensitive land uses could also be located adjacent to these freeways. However, CARB recommendations are advisory and should not be interpreted as defined “buffer zones.” Local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk, where necessary, CARB’s position is that infill development, mixed-use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. Additionally, measures can be incorporated into future project design that would reduce the level of exposure for future residents. CAPCOA published a guidance document, Health Risk Assessments for Proposed Land Use Projects, which provides recommended measures that reduce concentrations of DPM (CAPCOA, 2009). These include planting vegetation between the receptor and the freeway, constructing barriers between the receptor and the freeway, and installing newer electrostatic filters in adjacent receptor buildings. The proposed CPU incorporates appropriate policy measures to ensure future projects consider air quality in project designs. When discussing freeway-adjacent areas in the Implementation section, the proposed CPU states that “air quality...should be considered in all site planning and building design on all sites adjacent to and within 500 feet of a freeway. Residential uses in particular should be buffered from impacts of the freeway by taller buildings placed between the residential uses and the freeway, as well as landscaping.” The proposed CPU also contains policies for development adjacent to freeways, including policies to provide land use buffers such as off-street parking and landscaping between buildings and freeways, orienting buildings adjacent to freeways such that courtyards and residential units with operable windows and balconies face away from the freeway, and locating residential units above freeway elevations.²

Consistent with the goals of CARB’s handbook, the proposed CPU’s policies, implementing actions, and design guidelines support infill, mixed-use, higher density, and transit-oriented development

² See Policies for Development FAD-1 through FAD-3.

that would benefit regional air quality. By promoting this type of development and ensuring site planning and building design minimizes exposure of sensitive receptors to mobile source emissions, implementation of the proposed CPU would be consistent with the goals of CARB and would not expose sensitive receptors to substantial pollutant concentrations. Impacts related to the exposure of sensitive receptors to mobile source emissions would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.1-4: Odors

Would the proposed CPU create objectionable odors affecting a substantial number of people?

A potential odor impact can occur from two different situations: (1) the proposed CPU would introduce receptors (people) in a location where they would be affected by an existing or future planned odor source, or (2) proposed CPU land uses would generate odors that could adversely affect a substantial number of persons.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with construction-generated odors would be less than significant.

The type of facilities that are considered to generate objectionable odors during operation include wastewater treatments plants, landfills, and paint/coating operations (e.g., auto body shops), among others. The proposed CPU would allow for development of multi-family residential, commercial/retail, office, institutional, hotel, industrial, school, and park and open space land uses within the CPU area. While specific developments within the CPU area are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. The proposed CPU applies land uses based on the developed nature of the CPU area that includes residential uses in close proximity to commercial areas. A typical use in the CPU area that would generate odors would be restaurants as they can create odors from cooking activities but would not generally be considered adverse, since odors associated with restaurants or other commercial uses would be similar to existing residential and food service uses throughout the CPU area. Odor generation is generally confined to the immediate vicinity of the source. Thus, implementation of the proposed CPU would not create operational-related objectionable odors affecting a substantial number of people.

The area south of I-8 contains a number of automobile land uses such as car dealerships that include auto body shops. While auto body shops would be permitted, they would be required to comply with SDAPCD Rule 51 (Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. In addition, potential odors would

also be controlled and minimized through compliance with the City's "Air Contaminant Regulations" (SDMC Section 142.0710). Odors generated by new nonresidential land uses are not expected to be significant or highly objectionable. New and existing facilities are required to be in compliance with SDAPCD Rule 51 to prevent nuisance on sensitive land uses. Therefore, impacts related to objectionable odors would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

4.2 Biological Resources

This section analyzes the potentially significant impacts related to biological resources that could result from implementation of the proposed CPU. This analysis relies on secondary source information, existing biological resources databases and literature, and vegetation data available from the SANGIS Regional Geographic Information Systems (GIS) Data Warehouse. In addition, a one-day field reconnaissance was completed to verify the existing vegetation communities present in comparison to SANGIS data, primarily in proximity to accessible areas along the San Diego River. The results of this field reconnaissance survey are discussed in further detail below.

4.2.1 Environmental Setting

4.2.1.1 PHYSICAL SETTING

Vegetation Communities

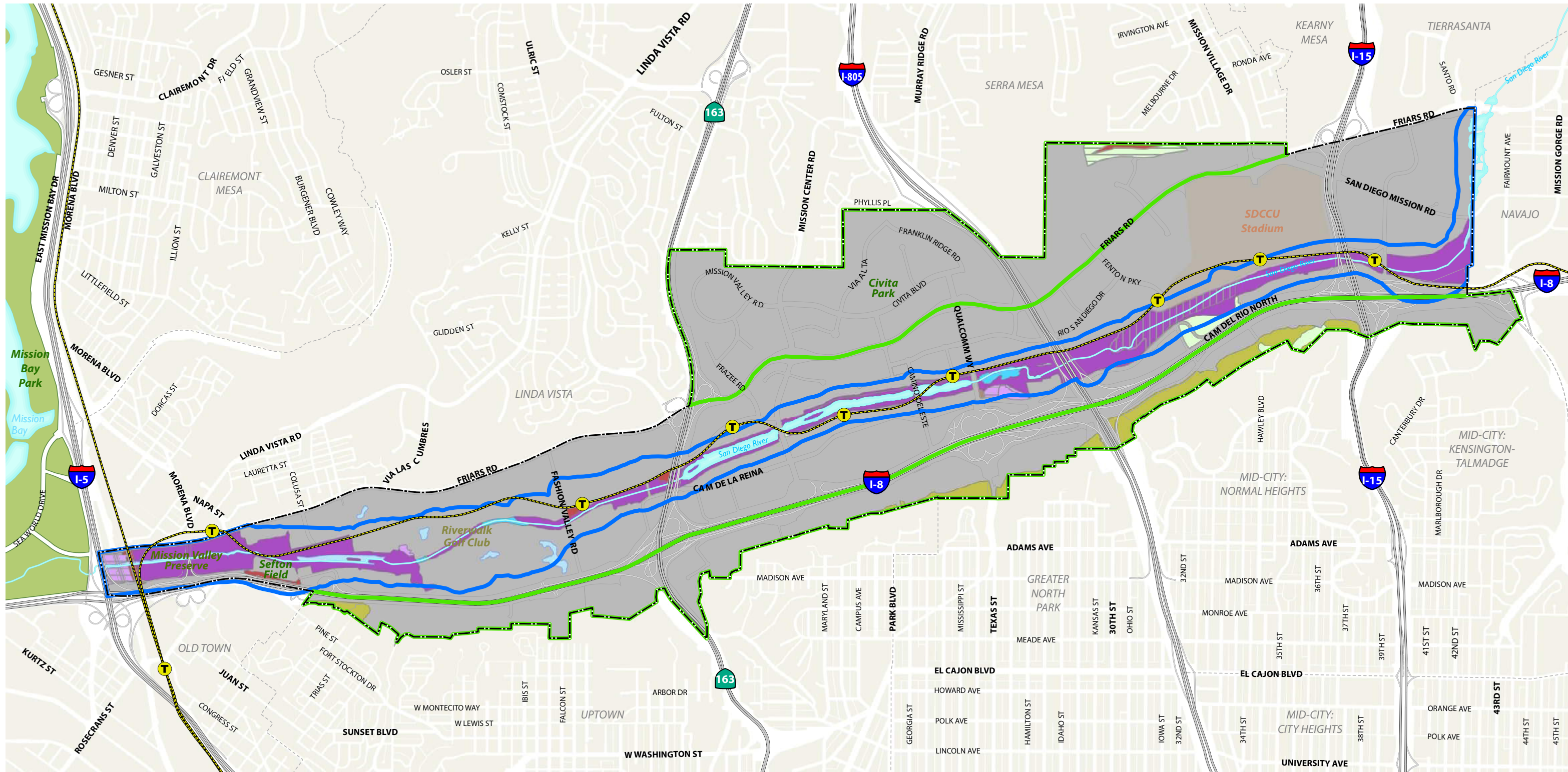
Vegetation communities/land cover types occurring within the CPU area are shown in Figure 4.2-1. Table 4.2-1 lists acreages per vegetation community/land cover type. A general description of each vegetation community and land cover type present within the CPU area is provided below.

Table 4.2-1: Existing Vegetation Communities/Land Cover Types within the Mission Valley CPU Area

Vegetation Community/ Land Cover type		City MSCP Tier	Acres within the MHPA	Acres outside of the MHPA
Upland	Coastal Sage Scrub	II	8	9
	Disturbed Coastal Sage Scrub	II	<1	12
	Chaparral	IIIA	8	54
Other	Disturbed Land	IV	3	7
	Eucalyptus Woodland	IV	<1	<1
	Urban/Developed	-	74	2,705
Riparian & Wetland	Disturbed Riparian Scrub	-	9	2
	Freshwater Marsh	-	5	2
	Open Water	-	30	11
	Riparian Scrub	-	<1	4
	Riparian Woodland	-	178	65
	Riparian Woodland - Restoration	-	25	3
TOTAL			341	2,875
Notes: Totals may not add due to rounding				
MSCP = Multiple Species Conservation Program				
MHPA = Multi-Habitat Planning Area				

Source: SANGIS Regional GIS Data Warehouse, 2015 (in addition to one day of field reconnaissance verification).

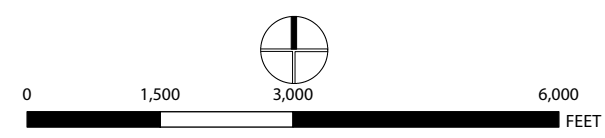
Figure 4.2-1: Vegetation Communities



Trolley Stops	Lakes/Ponds/Bays	San Diego River Subdistrict	Vegetation Communities and Land Cover Types		Disturbed Riparian Scrub
Light Rail	Mission Valley Community Plan Boundary	Hillside Subdistrict	Chaparral	Eucalyptus Woodland	Riparian Woodland
Freeways	Community Planning Areas		Coastal Sage Scrub	Fresh Water Marsh	Riparian Woodland - Restoration
Ramps			Disturbed Coastal Sage Scrub	Open Water	Urban/Dev
Streams/Creeks			Disturbed Land	Riparian Scrub	

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Upland Habitat

Sensitive vegetation communities are those considered rare within the region or sensitive by the California Department of Fish and Wildlife (CDFW) and/or the City. These communities, in any form (e.g., including disturbed), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species.

Within the City's Biology Guidelines, upland vegetation communities are divided into four tiers of sensitivity (the first includes the most sensitive, the fourth the least sensitive) based on rarity and ecological importance (City of San Diego, 2012). Tier I includes rare uplands. Tier II includes uncommon uplands. Tiers IIIA and IIIB include common uplands. Tier IV includes other uplands. Wetland communities are not assigned a tier.

The CPU area contains the following sensitive vegetation communities: coastal sage scrub, disturbed coastal sage scrub, chaparral, disturbed riparian scrub, freshwater marsh, open water, riparian scrub, and riparian woodland. The location of these sensitive vegetation communities within the CPU area are shown on Figure 4.2-1 and are summarized below.

Chaparral

Chaparral is considered a Tier IIIA by the City's Biology Guidelines (2012). Chaparral is a plant community typically dominated by broad-leaved sclerophyllous shrubs or small trees, and characteristically occupies protected north-facing and canyon slopes or ravines where more mesic conditions are present. Dominant shrubs in this community are typically 5 to 10 feet tall and may include lemonade berry (*Rhus integrifolia*), toyon (*Heteromeles arbutifolia*), laurel sumac (*Malosma laurina*), and ceanothus (*Ceanothus* spp.). The vegetation is usually dense, with little or no understory cover, but may include patches of bare soil. Many species in this community are adapted to repeated fires by their ability to stump sprout. Chaparral typically is found in the coastal foothills of San Diego County and Northern Baja California, usually at elevations below 3,000 feet. (Oberbauer et al., 2008)

Diegan Coastal Sage Scrub

Diegan coastal sage scrub (DCSS) is a vegetation community considered sensitive by federal and state resource agencies, and Tier II by the City's Multiple Species Conservation Program (MSCP). DCSS is the southern form of coastal sage scrub and is a plant community consisting of low-growing, aromatic, drought-deciduous soft-woody shrubs that have an average height of approximately three to four feet. The community typically is found on low moisture-availability sites with steep, xeric slopes or clay rich soils that are slow to release stored water. These sites often include drier south- and west-facing slopes and occasionally north-facing slopes, where the community can act as a successional phase of chaparral development. DCSS intergrades at higher elevations with several types of chaparrals, or in drier more inland areas with Riversidean sage scrub. DCSS is found in coastal areas from Los Angeles County south into Baja California, Mexico.

Eucalyptus Woodland

Eucalyptus woodland is Tier IV habitat by the City's Biology Guidelines. It is a prominent component of the City's canyon system. Quite a few eucalyptus species were intentionally introduced from arid portions of Australia to provide a readily grown tree. The understory within eucalyptus woodland is often devoid of all but the most ubiquitous non-native weeds.

Disturbed Habitat

Disturbed habitat is a Tier IV habitat and composed of areas that have been previously disturbed and no longer function as a native or naturalized vegetation community. Vegetation, if present, is dominated by opportunistic non-native species. Disturbed habitat can also include previously graded lands such as firebreaks, off-road vehicle trails, and construction staging sites.

Urban/Developed

Urban/developed areas are considered Tier IV by the City's Biology Guidelines and have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. This includes buildings, roads, parking lots, and landscaping of nonnative vegetation.

Riparian and Wetland Habitat

Wetland vegetation communities are dominated by plant species adapted to soils that have periods of prolonged saturation. Wetland vegetation communities are considered sensitive and regulated by the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), CDFW, Regional Water Quality Control Board (RWQCB), and the City. Several wetland communities occur within the CPU area and are described below.

Freshwater Marsh

Freshwater marsh communities are comprised of perennial emergent monocots typically forming a closed canopy. This habitat occurs in open bodies of fresh water with little current flow, such as ponds, and to a lesser extent around seeps and springs. Freshwater marshes occur in areas of permanent inundation by freshwater without active stream flow. Freshwater marsh communities, as with all wetland habitats, have been greatly reduced throughout their entire range and continue to decline as a result of urbanization and are considered sensitive by state and federal resource agencies.

Open Water

Open water generally consists of non-vegetated channels, floodways, and unvegetated freshwater habitat.

Riparian Woodland

Southern riparian forest is a moderately dense riparian woodland community that contains a majority of small trees and shrubs with a sparse density of tall, riparian trees. This community occurs in larger river and tributary systems in southern California. It has been observed throughout San Diego County and is characterized by western sycamore (*Platanus racemosa*), Cottonwoods (*Populus* spp.), and various willows (*Salix* spp.). This community tends to develop in stream systems with moderate amounts of scour events.

Riparian Scrub

Riparian scrub is a moderately dense riparian habitat that contains a majority of small trees, lacking taller riparian trees (Oberbauer et al., 2008). This community occurs in larger river and tributary systems in southern California. It is characterized by mule fat (*Baccharis salicifolia*), Goodding's black willow (*Salix gooddingii*), and red willow (*Salix lasiandra*). This community tends to develop in major river systems with moderate amounts of scour events.

Disturbed Riparian Scrub

Within the disturbed riparian scrub, the willows are absent, and mule fat is present in smaller amounts. Non-native species, including ngaio tree (*Myoporum laetum*), saltcedar (*Tamarix ramosissima*), and giant reed (*Arundo donax*) dominate this vegetation community.

Jurisdictional Waters/Wetlands

Agencies with jurisdictional authority over wetlands and other jurisdictional water resources within the CPU area include USACE, USFWS (if listed species are present), CDFW, RWQCB, and the City. Riparian and wetland habitats within the CPU area are shown on Figure 4.2-1; however, an assessment of wetland and waters resources would need to be made at the project level for subsequent development proposals. Approximately 334 acres of riparian and wetland habitats occur within the CPU area, as shown in Table 4.2-1.

Sensitive Biological Resources

According to City's Municipal Code (SDMC) (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City of San Diego, 2012), sensitive biological resources refer to upland and/or wetland areas that meet any one of the following criteria:

- (a) Lands that have been included in the MSCP Preserve (i.e., the Multi-Habitat Planning Area [MHPA]);
- (b) Wetlands;¹
- (c) Lands outside the MHPA that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;

1. City wetlands, specifically, are defined by the City's Municipal Code (Chapter 11, Article 3, Division 1)

- (d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations; or the federal Endangered Species Act (ESA), Title 50, Code of Federal Regulations, Section 17.11 or 17.12; or candidate species under the California Code of Regulations;
- (e) Lands containing habitats with MSCP narrow endemic (NE) species as listed in the Biology Guidelines; or
- (f) Lands containing habitats of MSCP covered species as listed in the Biology Guidelines.

Sensitive Plant Species

Sensitive plant species are those that are considered by the federal government, State, or California Native Plant Society (CNPS) as rare, threatened, or endangered; MSCP Covered Species; or MSCP NE species. More specifically, if a species is designated with any of the following statuses (a through c below), it is considered sensitive per the SDMC (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations; or the federal ESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12; or candidate species under the California Code of Regulations;
- (b) A species is a NE species as listed in the Biology Guidelines in the Land Development Manual; and/or
- (c) A species is an MSCP covered species as listed in the Biology Guidelines in the Land Development Manual.

A plant species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS, 2018).

Sensitive plant status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread, but exist naturally in small populations.

A number of special-status plant species have been documented within the CPU area based on a review of the California Natural Diversity Database (CNDDDB). Special-status species reported in the CNDDDB for the CPU area are detailed in Table 4.2-2. However, a majority of the documented species are based on historic locations of their documented occurrence prior to development. Most of the documented plant populations are likely extirpated within the CPU area due to development and elimination of suitable habitat. As detailed in Table 4.2-2, only two species are identified as having a moderate potential to occur (San Diego ambrosia [*Ambrosia pumila*] and decumbent goldenbush [*Isocoma menziesii*]) while the remaining species are identified as having a low or no potential to occur within the CPU area.

Table 4.2-2: Sensitive Plant Species Known or with the Potential to Occur in the Mission Valley CPU Area

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period	Potential to Occur
Agavaceae (Agave Family)					
<i>Agave shawii</i> var. <i>shawii</i> Shaw's agave	--	2B.1	NE, MSCP	Perennial leaf succulent; coastal bluff scrub, coastal sage scrub, maritime succulent scrub; blooms September– May; elevation less than 400 feet.	This species is not expected to occur as it is out of its known range.
Themidaceae (Brodiaea Family)					
<i>Bloomeria</i> [=Muilla] <i>clevelandii</i> San Diego goldenstar	--	1B.1	MSCP	Perennial herb (bulbiferous); chaparral, coastal sage scrub, valley and foothill grassland, vernal pools; clay soils; blooms May; elevation 170–1,500 feet.	There is a low potential for this species to occur within the coastal sage scrub on-site as this habitat is lacking clay soils.
Polygonaceae (Buckwheat Family)					
<i>Nemacaulis denudata</i> var. <i>denudata</i> coast woolly-heads	--	1B.2	--	Annual herb; coastal dunes; blooms April–September; elevation less than 330 feet.	This species is not expected to occur due to the lack of coastal dune habitat.
Cactaceae (Cactus Family)					
<i>Cylindropuntia</i> <i>californica</i> var. <i>californica</i> snake cholla	--	1B.1	NE, MSCP	Perennial stem succulent; chaparral, coastal sage scrub; blooms April–May; elevation 100–500 feet.	This species is not expected to occur as it is out of its known range.
Apiaceae (Carrot Family)					
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button- celery	CE/ FE	1B.1	NE, MSCP	Biennial/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April–June; elevation less than 2,000 feet. Known from San Diego and Riverside counties. Additional populations occur in Baja California, Mexico.	This species is not expected to occur due to the lack of vernal pool, mesic coastal sage scrub, and grassland habitat.
Chenopodiaceae (Goosefoot Family)					
<i>Aphanisma blitoides</i> <i>aphanisma</i>	--	1B.2	NE, MSCP	Annual herb; coastal bluff scrub, sandy soils; blooms March–June; elevation less than 1,000 feet.	This species is not expected to occur as it is out of its known range.
<i>Suaeda esteroa</i> estuary seablite	--	1B.2	--	Perennial herb; coastal salt marshes and swamps; blooms May–October; elevation less than 20 feet.	This species is not expected to occur due to the lack of coastal salt

Table 4.2-2: Sensitive Plant Species Known or with the Potential to Occur in the Mission Valley CPU Area

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period	Potential to Occur
					marsh and swamp habitat.
Poaceae (Grass Family)					
<i>Orcuttia californica</i> California Orcutt grass	CE/ FE	IB.1	NE, MSCP	Annual herb; vernal pools; blooms April–August; elevation 50–2,200 feet.	This species is not expected to occur due to the lack of vernal pool habitat.
Fabaceae (Legume Family)					
<i>Astragalus tener</i> var. <i>titi</i> coastal dunes milkvetch	CE/ FE	IB.1	NE, MSCP	Annual herb; coastal bluff scrub, coastal dunes, sandy soils, mesic coastal prairie; blooms March–May; elevation less than 200 feet. California endemic. Known from fewer than 10 occurrences in San Diego (presumed extirpated), Los Angeles (presumed extirpated), and Monterey counties.	This species is not expected to occur as it is out of its known range and lack of coastal bluff scrub, dune habitat.
Lamiaceae (Mint Family)					
<i>Acanthomintha ilicifolia</i> San Diego thornmint	CE/ FT	IB.1	NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	There is a low potential for this species to occur within the coastal sage scrub and chaparral on-site as these habitats are lacking clay soils.
<i>Pogogyne abramsii</i> San Diego mesa mint	CE/ FE	IB.1	NE, MSCP	Annual herb; vernal pools; blooms April–July; elevation 300–700 feet. San Diego County endemic.	This species is not expected to occur due to the lack of vernal pool habitat.
<i>Pogogyne nudiuscula</i> Otay mesa mint	CE/ FE	IB.1	NE, MSCP	Annual herb; vernal pools; blooms May–July; elevation 300–820 feet. In California, known from approximately 10 occurrences in Otay Mesa in San Diego County. Additional populations occur in Baja California, Mexico.	This species is not expected to occur due to the lack of vernal pool habitat.
Polemoniaceae (Phlox Family)					
<i>Navarretia fossalis</i> spreading navarretia	FT	IB.1	NE, MSCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.	This species is not expected to occur due to the lack of vernal pool habitat.

Table 4.2-2: Sensitive Plant Species Known or with the Potential to Occur in the Mission Valley CPU Area

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period	Potential to Occur
Crassulaceae (Stonecrop Family)					
<i>Dudleya brevifolia</i> short-leaved dudleya [short- leaved live-forever]	CE	IB.1	NE, MSCP	Perennial herb; southern maritime chaparral, coastal sage scrub on Torrey sandstone; blooms in April; elevation less than 1,000 feet. San Diego County endemic. Known from fewer than five occurrences in the Del Mar and La Jolla areas.	This species is not expected to occur due to the lack of southern maritime chaparral and coastal sage scrub on Torrey sandstone.
<i>Dudleya variegata</i> variegated dudleya	--	IB.2	NE, MSCP	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; clay and loamy soils; blooms May–June; elevation less than 1,900 feet.	There is a low potential for this species to occur within the coastal sage scrub and chaparral on-site as these habitats are lacking clay loamy soils.
Asteraceae (Sunflower Family)					
<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i> beach goldenaster	--	IB.1	--	Perennial herb; chaparral (coastal), coastal dunes, coastal scrub; blooms March–December; elevation less than 4,000 feet. Known in California from 12 occurrences presumed to be extant in San Diego County. Additional populations occur in Baja California, Mexico.	This species is not expected to occur as it is out of its known range.
<i>Stylocline citroleum</i> oil nest-straw	--	IB.1	--	Annual herb; chenopod scrub; potentially coastal sage scrub, valley and foothill grasslands; clay soils; blooms March–April; elevation less than 1,300 feet. California endemic. Known from San Diego (presumed extirpated) and Kern counties.	Low – this species is likely extirpated from San Diego county and the habitats present on-site lack clay soils.
<i>Ambrosia pumila</i> San Diego ambrosia	FE	IB.1	NE, MSCP	Perennial herb (rhizomatous); chaparral, coastal sage scrub, valley and foothill grasslands, creek beds, vernal pools, often in disturbed areas; blooms May–September; elevation less than 1,400 feet. Many occurrences extirpated in San Diego County.	There is moderate potential for this species to occur within the coastal sage scrub on-site.

Table 4.2-2: Sensitive Plant Species Known or with the Potential to Occur in the Mission Valley CPU Area

Species	State/ Federal Status	CNPS Rare Plant Ranking	City of San Diego	Habitat/Blooming Period	Potential to Occur
<i>Baccharis vanessae</i> Encinitas baccharis	CE/ FT	IB.1	NE, MSCP	Perennial deciduous shrub; chaparral; maritime; sandstone; blooms August–November; elevation less than 2,500 feet. San Diego County endemic. Known from fewer than 20 occurrences. Extirpated from Encinitas area.	This species is not expected to occur as it is out of its known range.
<i>Deinandra conjugens</i> Otay tarplant	CE/ FT	IB.1	NE, MSCP	Annual herb; clayey soils of coastal scrub openings, valley and foothill grassland; blooms April–June, elevation less than 1,000 feet.	This species is not expected to occur as it is out of its known range.
<i>Isocoma menziesii</i> var. <i>decumbens</i> decumbent goldenbush	--	IB.2	--	Perennial shrub; chaparral, coastal sage scrub; sandy soils, often in disturbed areas; blooms April–November; elevation less than 500 feet.	There is moderate potential for this species to occur within the coastal sage scrub on-site.
FEDERAL CANDIDATES AND LISTED PLANTS		STATE LISTED PLANTS			
FE = Federally listed endangered		CE = State listed endangered			
FT = Federally listed threatened					
CNPS: CALIFORNIA RARE PLANT RANKS (CRPR)					
IB = Species rare, threatened, or endangered in California and elsewhere. Species eligible for state listing.					
2B = Species rare, threatened, or endangered in California but more common elsewhere. Species eligible for state listing.					
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).					
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).					
CITY OF SAN DIEGO					
NE = Narrow endemic					
MSCP = Multiple Species Conservation Program covered species					

Sources: State of California 2018a, 2018b, 2018c.

Sensitive Wildlife Species

Sensitive animal species are those that are considered federal or State threatened or endangered; MSCP Covered Species; or MSCP NE species. More specifically, if a species is designated with any of the following statuses (a through c below), it is considered sensitive per the SDMC (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as endangered or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal ESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (b) A species is a NE species as listed in the Biology Guidelines in the Land Development Manual (City of San Diego, 2012); and/or
- (c) A species is an MSCP covered species as listed in the Biology Guidelines in the Land Development Manual (City of San Diego, 2012).

A species may also be considered sensitive if it is included on the CDFW’s special animals list as a candidate for federal or State listing, State species of special concern, State watch list species, State fully protected species, or federal bird of conservation concern. Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Additionally, avian nesting is protected by the California Fish and Game Code 3503.

Based on a review of CNDDDB data and habitat within the CPU area, seven special-status wildlife species have been documented or have potential to occur (Table 4.2-3). The CPU area contains suitable habitat for these special-status wildlife species, and thus they are considered to have a high potential to occur in CPU area. Additionally, as noted in Table 4.2-3, two of the wildlife species were observed within the CPU area during the field reconnaissance.

Table 4.2-3: Sensitive Wildlife Species Known to Occur in the Mission Valley CPU Area

<i>Species</i>	<i>Listing Status</i>	<i>Habitat/Comments</i>	<i>Potential to Occur</i>
Accipitridae (Hawks, Kites, & Eagles)			
<u>Cooper’s hawk</u> <i>Accipiter cooperii</i>	WL, MSCP	<u>Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.</u>	<u>High</u>
Vireonidae (Vireos)			
Least Bell’s vireo (nesting) <i>Vireo bellii pusillus</i>	FE, CE, MSCP	Willow riparian woodlands. Summer resident.	High
Molossidae (Free-tailed Bats)			

Table 4.2-3: Sensitive Wildlife Species Known to Occur in the Mission Valley CPU Area

<i>Species</i>	<i>Listing Status</i>	<i>Habitat/Comments</i>	<i>Potential to Occur</i>
Western mastiff bat <i>Eumops perotis californicus</i>	CSC	Woodlands, rocky habitat, arid and semiarid lowlands, cliffs, crevices, buildings, tree hollows. Audible echolocation signal.	High
Phyllostomidae (New World Leaf-nosed Bats)			
Mexican long-tongued bat <i>Choeronycteris mexicana</i>	CSC	Low deserts. Caves, mines, buildings. Colonial. Migrational. Mostly near Colorado River in California.	High
Sylviidae (Gnatcatchers)			
Coastal California gnatcatcher <i>Polioptila californica californica</i>	FT, CSC, MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	High
Pelobatidae (Spadefoot Toads)			
Western spadefoot <i>Spea hammondi</i>	CSC	Vernal pools, riparian areas, floodplains, and alkali flats within areas of open vegetation.	High
Parulidae (Wood Warblers)			
Yellow warbler (nesting) <i>Setophaga [=Dendroica] petechia</i>	CSC	Breeding restricted to riparian woodland. Spring and fall migrant, localized summer resident, rare winter visitor.	High – Observed in CPU area
Yellow-breasted chat (nesting) <i>Icteria virens auricollis</i>	CSC	Dense riparian woodland. Localized summer resident.	High – Observed in CPU area
<p>STATUS CODES</p> <p>Listed/Proposed</p> <p>FE = Listed as endangered by the federal government</p> <p>FT = Listed as threatened by the federal government</p> <p>CE = Listed as endangered by the state of California</p> <p>Other</p> <p>CSC = California Department of Fish and Wildlife species of special concern</p> <p>MSCP = City and County of San Diego Multiple Species Conservation Program covered species</p>			

Sources: State of California 2018a, 2018d, 2018e.

Wildlife Movement

Habitat linkages and wildlife corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Habitat linkages and wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies.

The San Diego River corridor that runs through the CPU area functions as a wildlife corridor providing connection of coastal and inland habitats. The City recognized the importance of this riparian corridor as a landscape linkage for amphibians, reptiles, birds, and small- and medium-sized mammals when delineating the MHPA for the City's MSCP. Despite the urbanized surrounding area, the San Diego River riparian habitat is an area of relatively high species diversity and abundance and provides a regional wildlife corridor.

4.2.1.2 REGULATORY SETTING

Federal Regulations

Endangered Species Act

The federal Endangered Species Act (ESA), as amended (16 United States Code [USC] 1531 et seq.), provides for listing of endangered and threatened species of plants and animals and designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from "taking" endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult the USFWS and/or the National Marine Fisheries Service to ensure adequate protection of listed species that may be affected by the project.

Clean Water Act

The federal Water Pollution Control Act (also known as the Clean Water Act [CWA]) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987 (PL 1000-4), is the major federal legislation governing water quality. The purpose of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Discharges into waters of the U.S are regulated under Section 404. Waters of the U.S. include (1) all navigable waters (including all waters subject to the ebb and flow of tides); (2) all interstate waters and wetlands; (3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, or natural ponds; (4) all impoundments of waters mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and (7) all wetlands adjacent to waters mentioned above. In California, the State Water Resources Control Board (SWRCB) and the nine RWQCBs are responsible for implementing the CWA. Important applicable sections of the CWA are discussed below:

- Section 303 requires states to develop water quality standards for inland surface and ocean waters and submit to the U.S. Environmental Protection Agency (USEPA) for approval. Under Section 303(d), the state is required to list waters that do not meet water quality standards and to develop action plans, called total maximum daily loads, to improve water quality.
- Section 304 provides for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the U.S. to obtain certification from the state that the discharge will comply with other provisions of the CWA. Certification is provided by the respective RWQCB.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the U.S. The NPDES program is administered by the RWQCB. Conformance with Section 402 is typically addressed in conjunction with water quality certification under Section 401.

Section 404 provides for issuance of dredge/fill permits by the USACE. Permits typically include conditions to minimize impacts on water quality. Common conditions include USACE review and approval of sediment quality analysis before dredging, a detailed pre- and post-construction monitoring plan that includes disposal site monitoring, and required compensation for loss of waters of the U.S.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 USC 703 et seq.), or MBTA, is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and is listed at 50 Code of Federal Regulations (CFR) 10.13. The regulatory definition of “migratory bird” is broad and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 CFR 10.12). The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11). Pursuant to U.S. Department of the Interior Memorandum M-37050, the federal MBTA is no longer interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

U.S Army Corps of Engineers

The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the CPU area. In this regard, the USACE acts under two statutory authorities, the Rivers and Harbors Act (33 U.S.C., Sections 9 and 10), which governs specified activities in navigable waters, and the CWA (Section 404), which governs specified activities in waters of the U.S., including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, and natural ponds) are a subset of waters of the U.S. and receive protection under Section

404 of the CWA. The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area under statutory authority of the CWA (Section 404). In addition, the regulations and policies of various federal agencies mandate that the filling of wetlands be avoided to the maximum extent feasible. The USACE requires obtaining a permit if a project proposes placing structures within navigable waters and/or alteration of waters of the U.S.

State Regulations

California Endangered Species Act

Similar to the federal ESA, the California ESA of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The California ESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

California Fish and Game Code

The California Fish and Game Code regulates the handling and management of the state's fish and wildlife. Most of the code is administered or enforced by the CDFW (before January 1, 2013, California Department of Fish and Game).

- Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.
- Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.3 of the CDFW Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs (State of California 1991).

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), established the principal California legal and regulatory framework for water quality control. The act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal CWA. The State of California is divided into nine regions governed by their respective RWQCB. The RWQCBs implement and enforce provisions of the California Water Code and CWA under the oversight of the SWRCB.

Local Regulations

Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City signed an Implementing Agreement with USFWS and CDFW. The Implementing Agreement serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The agreement became effective on July 17, 1997 and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

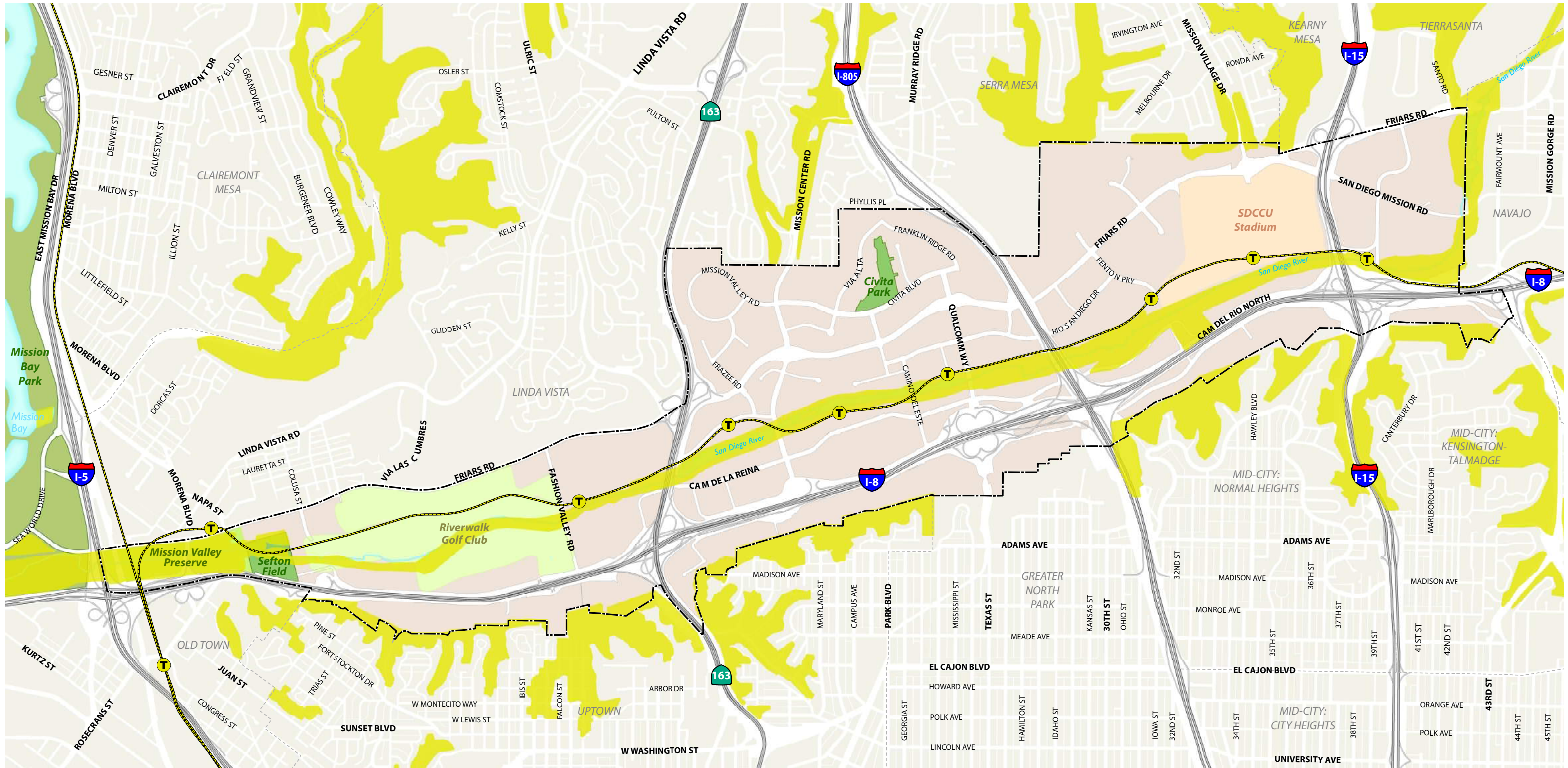
Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]." Portions of MHPA in and around the CPU area are shown in Figure 4.2-2.

Private land wholly within the MHPA is allowed up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.5.2 of the Final MSCP Subarea Plan. All MHPA boundary line adjustments require approval by the USFWS, CDFW, and the City.

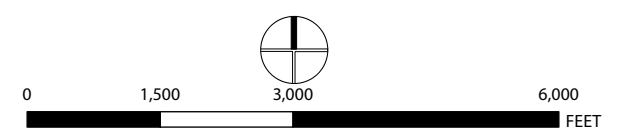
For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biological Guidelines.

Figure 4.2-2: City of San Diego MHPA



	Trolley Stops		Lakes/Ponds/Bays		City of San Diego MHPA
	Light Rail		Parks		Mission Valley Community Plan Boundary
	Freeways		Community Planning Areas		
	Ramps				
	Streams/Creeks				

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The MSCP Section 1.5 Framework Management Plan includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

MHPA Land Use Adjacency Guidelines

MSCP Section 1.4.3 was developed to manage land uses adjacent to the MHPA, as well as address the integrity of the MHPA by alleviating indirect impacts to the MHPA. The MHPA Land Use Adjacency Guidelines are incorporated into applicable permit conditions during the development review phase of a proposed project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/ development, as follows:

LIGHTING

Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

DRAINAGE

All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.

TOXICS

Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.

NOISE

Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and

be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

BARRIERS

New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

INVASIVES

No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

BRUSH MANAGEMENT

New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City's regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

For existing project and approved projects, the brush management zones, standards and locations, and clearing techniques will not change from those required under existing regulations.

GRADING/LAND DEVELOPMENT

Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

MSCP Subarea Plan: Overall Management Policies and Directives for Urban Habitat Area

The proposed CPU is part of the Urban Habitat Areas of the MHPA. The Urban Areas within the City's MHPA include existing designated open space such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon, San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake canyons, Florida Canyon, Chollas Creek, Point Loma and a variety of smaller canyon systems dispersed throughout the more urban areas of the City. The MSCP Subarea Plan describes the Urban Habitat Areas of the MHPA and its vision as a network of open and relatively undisturbed canyons containing a full ensemble of native species and providing functional wildlife habitat and movement capability. Management directives to achieve this vision are provided in the MSCP.

The specific MSCP guidelines for Urban Areas include Guideline B-15 and B-16, as listed below:

- B-15: Native vegetation shall be restored as a condition of future development proposals along this portion of the San Diego River corridor.
- B-16: Management of the least tern area shall be pursuant to the adopted Mission Bay Master Plan and associated Natural Resources Management Plan (1990).

The general MHPA guidelines and management directives identify the major issues listed below (as excerpted from Section 1.5.7 of the City's MSCP Subarea Plan):

- Intense land uses and activities adjacent to and in covered species habitat;
- Dumping, litter, and vandalism;
- Itinerant living quarters;
- Utility, facility and road repair, construction, and maintenance activities;
- Exotic (non-native), invasive plants and animals;
- Urban runoff and water quality.

City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the Environmentally Sensitive Lands (ESL) Regulations is to protect, preserve, and, where damaged restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resources conservation principles and the rights of private property owners.

The ESL Regulations cover sensitive biological resources, including wetlands, within and outside of the coastal zone and MHPA. In addition to protecting wetlands, the ESL Regulations require a wetland buffer be maintained around all wetlands as appropriate to protect the functions and values of the wetland. Section 320.4(b)(2) of the USACE General Regulatory Policies (33CFR 320- 330) list criteria for consideration when evaluating wetland functions and values. These include wildlife habitat (spawning, nesting, rearing, and foraging), food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters.

The ESL present in the CPU area include:

- Sensitive biological resources;
- Steep hillsides; and
- Special flood hazard areas.

Future development proposed in accordance with the proposed CPU would be required to comply with all applicable ESL Regulations.

City of San Diego General Plan Conservation Element

The City's General Plan establishes citywide policies to be cited in conjunction with a Community Plan. The General Plan presents goals and policies for biological resources in the Conservation Element, which generally aim to: protect and conserve the landforms, canyon lands, and open spaces; limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands; manage and/or minimize runoff, sedimentation, and erosion due to construction activity in order to improve watershed management and water quality; manage wetland areas for natural flood control and preserve wetland areas; preserve areas within the MSCP and implement the goals and policies of the City's MSCP Subarea Plan; support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values; and to work with private, State, and federal organizations or people in order to implement an effective wetland management system.

City of San Diego River Park Master Plan

The San Diego River Park Master Plan (SDRPMP), adopted in 2013, provides the vision and guidance to restore the relationship between the San Diego River and surrounding communities by creating a linear river park, stretching from the Pacific Ocean at Ocean Beach Park to the City's jurisdictional eastern boundary at the City of Santee. The SDRPMP covers the 17.5-mile stretch of the San Diego River. Future actions anticipated by the SDRPMP include implementation of design guidelines, parking, landscaping, storm water and water quality improvements, lighting, signage, brush management, structures, and floodway, path, and trail improvements.

4.2.2 Impact Analysis

4.2.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to biological resources are based on the City's CEQA Significance Determination Thresholds (2016), which have been modified to guide a programmatic analysis for the proposed CPU. A significant impact to biological resources could occur if implementation of the proposed CPU would result in:

- 1) A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS;
- 2) A substantial adverse impact on any Tier I habitats, Tier II habitats, Tier IIIA habitats, or Tier IIIB habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;

- 3) A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
- 4) Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Subarea Plan, or impede the use of native wildlife nursery sites; or
- 5) A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region.

4.2.2.2 METHODOLOGY AND ASSUMPTIONS

The analysis of biological resources for the CPU area was performed at the plan level using existing databases and literature as cited in the sections below. In addition, one day of field reconnaissance was completed to verify the existing vegetation communities present in comparison to the map atlas vegetation data prepared by Dyett & Bhatia, which was based on SANGIS Regional GIS Data Warehouse data. The field reconnaissance focused on accessible areas of the river and a visual inspection of slopes containing native vegetation. Vegetation communities and cover types are described in accordance with the Draft Vegetation Communities of San Diego County (Oberbauer et al., 2008), based on the Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland, 1986). Assessments of the sensitivity of habitats are based primarily on the CNPS (CNPS, 2018), the CNDDDB (State of California, 2017), City of San Diego Biology Guidelines (City of San Diego, 2012), and Holland (1986).

4.2.2.3 IMPACTS

Impact 4.2-1: Sensitive Species

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

As detailed in Section 4.2.1.1 of this PEIR, the sensitive wildlife species that may occur in the CPU area include the ~~tricolored blackbird (*Agelaius tricolor*)~~, least Bell's vireo (*Vireo bellii pusillus*), western mastiff bat (*Eumops perotis*), coastal California gnatcatcher (*Polioptila californica*), Mexican long-tongued bat (*Choeronycteris mexicana*), western spadefoot toad (*Spea hammondi*), yellow warbler (*Setophaga petechia*), Cooper's hawk (*Accipiter cooperii*), ~~Light footed Ridgway's clapper rail (*Rallus longirostris levipes*)~~, ~~Southwestern willow flycatcher (*Empidonax traillii extimus*)~~, and the yellow-breasted chat (*Icteria virens*). These sensitive species would have a potential to occur within appropriate habitats along the San Diego River, as well as the slopes along the edges of the CPU area that support native vegetation. While development associated with the proposed CPU planned land uses would largely occur within existing disturbed or urban/developed lands, some sensitive habitats may be impacted as a result of

future development. The Area Specific Management Directives of the MSCP covered species present in the CPU area are identified in Table 4.2-4.

A majority of the sensitive habitats within the CPU area are located within the MHPA, along the San Diego River. Areas within the MHPA should not be subject to potential impacts associated with future development, as limited development is permissible within the MHPA, and only under the specific circumstances detailed in the Regulatory Setting, above. However, some upland and riparian habitats occur outside of the MHPA, along the boundaries of the river corridor and along slopes at the edges of the CPU area (refer to Table 4.2-1 for acreages and types of sensitive habitats located within and outside of the MHPA). Lands outside of the MHPA could be subject to development and associated impacts on sensitive species; additionally, indirect impacts to MHPA lands could occur as a result of development adjacent to MHPA.

Section 3503 of the California Fish and Game Code, which is enforced by the CDFW, makes it unlawful “by any means or in any manner, to Section 3503 of the California Fish and Game Code pursue, hunt, take, capture, [or] kill” any migratory bird or attempt such actions, except as permitted by regulation. During future site-specific project environmental review, if any habitats are present on-site with the potential to support sensitive bird species, the City would require a pre-construction bird survey to be completed to identify the presence or absence of any species identified as a listed, candidate, sensitive, or special status species in the MSCP. If birds are present, the project would be required to limit grading and land disturbance within areas that support active nests to outside of the breeding season for these species (February 1 to September 15) consistent with Section 3503 of the Fish and Game Code and the City’s MSCP Subarea Plan. Alternatively, protective measures such as sound walls and implementation of buffer areas would be required to ensure grading and site disturbance does not adversely affect nesting or breeding birds.

Future site-specific environmental review and associated compliance with the ESL Regulations, the City’s Biology Guidelines, and the provisions of the MSCP Subarea Plan including Section 3503 of the California Fish and Game Code are ensured through the requirement for discretionary review for future projects within one of the two designated Community Plan Implementation Overlay Zones (CPIOZ) identified within the CPU area. All sensitive habitats within the CPU area are located within one of the two proposed CPIOZ areas as show on Figure 4.2-1. The Hillside Subdistrict CPIOZ would be applied in hillside areas to respect, preserve, and/or recreate hillside areas. The San Diego River CPIOZ would include the River Corridor Area and the River Influence Area and is intended to implement the San Diego River Park Master Plan. The proposed CPU identifies a number of supplemental development regulations that would apply to future development within proposed CPIOZ areas, including a requirement that projects shall comply with MHPA Land Use Adjacency Guidelines. The location of proposed CPIOZ areas within the CPU area is shown on Figure 36 of the proposed Mission Valley CPU.

Potential indirect impacts to sensitive habitats and wildlife species would be protected through required implementation of MHPA Land Use Adjacency Guidelines that would be implemented as a requirement of the applicable CPIOZ. Thus, with implementation of existing regulatory protections for biological resources that will be required through a subsequent discretionary action associated with the proposed Hillside Subdistrict and San Diego River Park CPIOZ, impacts to sensitive species resulting from the future development within the CPU area would be less than significant.

Table 4.2-4: Area Specific Management Directives

Species Name	Area Specific Management Directives
Cooper's hawk <i>Accipiter cooperii</i>	Area specific management directives must include 300-foot impact avoidance areas around the active nests, and minimization of disturbance in oak woodlands and oak riparian forests.
Light-footed Ridgway's [=clapper] rail <i>Rallus longirostris</i> <i>levipes</i>	Area specific management directives must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species.
Southwestern willow flycatcher <i>Empidonax traillii</i> <i>extimus</i>	Jurisdictions must require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be impacted and incorporate mitigation measures consistent with the 404(b)1 guidelines into the project. Participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. For new developments adjacent to preserve areas that create conditions attractive to brown headed cowbirds, jurisdictions must require monitoring and control of cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 1 and May 1 (i.e., outside of the nesting period).
Coastal California gnatcatcher <i>Polioptila californica</i>	Area specific management directives must include measures to reduce edge effects and minimize disturbance during the nesting period, fire protection measures to reduce the potential for habitat degradation due to unplanned fire, and management measures to maintain or improve habitat quality including vegetation structure. No cleaning of occupied habitat within the cities' MHPAs and within the County's Biological Resource Core Areas may occur between March 1 and August 15.
Least Bell's vireo <i>Vireo bellii pusillus</i>	Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting period).
Tricolored blackbird <i>Agelaius tricolor</i>	Area specific management directives must include measures to avoid impacts to breeding colonies, and specific measures to protect against detrimental edge effects to this species.

Source: City of San Diego, 1997.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.2-2: Sensitive Habitats

Would the proposed CPU result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development Manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

a. Sensitive Vegetation Communities

As detailed in Section 4.2.1.1, the CPU area contains sensitive upland vegetation communities including coastal sage scrub and disturbed coastal sage scrub (Tier II) and chaparral (Tier IIIA). These vegetation communities are primarily located within the San Diego River and native upland habitat remnants along steep slopes. Sensitive riparian and wetland habitats are also present and discussed under Impact 4.2-3. The remainder of the CPU area is built out and supports very few sensitive vegetation communities. Implementation of the proposed CPU would impact primarily disturbed land and urban/developed land, which are not considered sensitive vegetation communities.

A relatively small acreage of sensitive vegetation is currently located outside of the MHPA or designated open space. It occurs along the edges of steep slopes and within areas that could be subject to Brush Management Zone 1 clearing or re-development of a parcel or its existing structures. Potential impacts to sensitive vegetation communities could include the loss of coastal sage scrub and chaparral habitat (see Figure 4.2-1). However, all projects with sensitive biological resources would require subsequent environmental review associated with the Hillside or San Diego River CPIOZ. Development within these areas would require environmental review including compliance with the City's ESL Regulations prior to disturbance of those lands. Compliance with the established development standards contained in the City's ESL Regulations, Biology Guidelines, MSCP Subarea Plan, and MHPA Land Use Adjacency Guidelines would ensure that impacts to sensitive vegetation communities would be less than significant.

b. Sensitive Plants

Implementation of the proposed CPU would have the potential to impact San Diego ambrosia (*Ambrosia pumila*) and decumbent goldenbush (*Isocoma menziesii*) within the limited areas that development is located within suitable habitat for these species. Implementation of the proposed CPU would result in land use changes that would affect primarily developed areas that lack suitable habitat to support sensitive plants. It is anticipated that sensitive plant species, if they occur, would be located within the San Diego River habitat areas or steep slopes within the CPU area that would require subsequent environmental review associated with their location within proposed CPIOZ areas. As with potential impacts to sensitive habitats, potentially occurring sensitive plant species would be conserved in accordance with ESL Regulations, the City's Biology Guidelines, and the provisions of the MSCP Subarea Plan. Further, due to the limited extent of suitable habitat potentially supporting these plant species, impacts to these species would be minimal within the

CPU area and would not affect their regional populations. Thus, impacts to sensitive plants resulting from build-out of the proposed CPU would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.2-3: Wetlands

Would the proposed CPU result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Wetland habitats in the CPU area consist of disturbed riparian scrub, freshwater marsh, open water, riparian scrub, riparian woodland, and riparian woodland–disturbed. These wetland habitats are largely located in within the San Diego River MHPA, which runs east to west through the central portion of the CPU area (Figure 4.2-2). Wetland habitats would largely be protected due to their location both within existing open space and/or the MHPA. However, where wetlands exist outside of the MHPA, potential impacts could result. However, all wetland habitats within the CPU area are located within the San Diego River CPIOZ and would require a subsequent environmental review. Future development projects implemented under the proposed CPU that are located within a CPIOZ would be reviewed on a project-by-project basis to determine if impacts to wetlands would occur. If impacts to wetlands would occur, they would be regulated by the USACE according to Section 404 of the CWA, the RWQCB in accordance with Section 401 of the CWA, the CDFW under Section 1600 of California Fish and Game Code, and the City in accordance with the biology guidelines, ESL Regulations, and the MSCP Subarea Plan. With implementation of the existing regulatory framework and the proposed supplemental development regulations of the River Subdistrict CPIOZ, impacts to riparian habitats and wetlands would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.2-4: Wildlife Corridors and Nursery Sites

Would the proposed CPU interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Subarea Plan, or impede the use of native wildlife nursery sites?

Within the CPU area, the San Diego River provides for local wildlife movement for birds and small mammals. The San Diego River is part of a major wildlife corridor system that allows for wildlife species movement between the Pacific Ocean and inland canyon systems and other major off-site habitat areas. The San Diego River corridor is designated as MHPA, which provides protections from future development. Additionally, the proposed CPU would not change land uses that would allow development within the San Diego River corridor that could impede wildlife corridors or nursery sites. Thus, no impact to wildlife corridors would occur.

Implementation of the proposed CPU has the potential to result in direct impacts to migratory or nesting birds, as discussed under Impact 4.2-1 above. Where future development areas contain trees or are located adjacent to trees that could serve as nesting habitat for migratory birds, there is a potential for adverse impacts to wildlife nursery sites if construction occurs during the typical bird breeding season (February 1 to September 15). To remain in compliance with Section 3503 of the California Fish and Game Code, pre-construction nest surveys would be required to determine the presence or absence of breeding birds if construction would occur within or adjacent to potentially occupied habitat during the typical bird breeding season. If birds are present, appropriate measures such as construction setbacks and/or noise walls and biological (noise) monitoring during construction would be required to ensure impacts to nesting birds or their eggs, chicks, or nests would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.2-5: Multiple Species Conservation Program

Would the proposed CPU result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region?

MHPA lands within the CPU area are shown in Figure 4.2-2 and are generally located along the path of the San Diego River in addition to some areas along the edges of the CPU area where vegetated slopes occur. While MHPA lands are considered by the City to be a sensitive biological resource, limited development is allowed in the MHPA subject to the requirements of the City's MSCP Subarea Plan (i.e., typically up to 25 percent of a property wholly in the MHPA can be developed and some uses are considered compatible within the MHPA). In cases where previously developed land has been included within the MHPA, the MHPA Boundary Line Correction process can be used to remove developed land. A MHPA Boundary Line Correction may be considered at a project level in close coordination with the City as well as state and federal wildlife agencies that would allow project activities to occur within areas of the MHPA that are developed or disturbed.

Development adjacent to MHPA lands would be subject to the City's MHPA Land Use Adjacency Guidelines, which address indirect effects on the MHPA from adjacent development. Indirect effects can occur wherever development and human activity are adjacent to natural areas. These effects include those due to increased runoff, trampling, and removal of plant cover due to hiking, biking, and other human activities; increased presence of toxins; increased nighttime light levels; redirection or blockage of wildlife movement; and increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. The City's MHPA Land Use Adjacency Guidelines address requirements for grading and land development including drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise. The MHPA Land Use Adjacency Guidelines require certain measures to be incorporated into the design of projects adjacent to the MHPA to reduce potential indirect impacts to the MHPA to less than significant. The proposed CPU would implement the Land Use Adjacency Guidelines as described in Table 4.2-5.

Table 4.2-5: MHPA Land Use Adjacency Guidelines Consistency

<i>Land Use Adjacency Guideline</i>	<i>Consistency Determination</i>
<p>Drainage. All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales, or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.</p>	<p>Consistent. Future development within the CPU area would be required to comply with City regulations including the City’s drainage regulations in the City’s Drainage Design Manual. Buildout of the proposed CPU would also be required to comply with the hydromodification management requirements described in the City’s Storm Water Standards Manual. These requirements have been developed to comply with the Municipal Storm Water Permit, San Diego RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266. Typical features employed on a project site to control the rate and volume of runoff are retention/infiltration basins, biofiltration basins, or detention basins. Future development within the CPU area that drains directly to the San Diego River via hardened conveyance systems may be exempt from the hydromodification management requirements because under the 2011 Final HMP, the San Diego River from the Pacific Ocean to the confluence with San Vicente Creek has been determined to be not susceptible to erosion from increased flow rates and volumes from new impervious areas. Exemption from hydromodification management requirements is for projects that discharge directly to the exempt reach of the San Diego River, and those projects must meet the criteria for direct discharge defined in the City’s Storm Water Standards Manual.</p>
<p>Toxics– Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly-owned property as leases come up for renewal.</p>	<p>Consistent. Future development occurring within the CPU area located adjacent to the MHPA would be located within one of the two CPIOZ areas which would require subsequent environmental review to occur. This review would ensure compliance with the Land Use Adjacency Guidelines, which would ensure drainage from development does not flow into the MHPA and may require the implementation of measures such as drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials.</p>

Table 4.2-5: MHPA Land Use Adjacency Guidelines Consistency

<i>Land Use Adjacency Guideline</i>	<i>Consistency Determination</i>
<p>Lighting. Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.</p>	<p>Consistent. The proposed CPU includes policies for development in the river corridor area related to lighting, and states: “All lighting shall be shielded and directed away from the floodway, the edge of the San Diego River Pathway fronting the river, and the MHPA.” and “All lighting within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.” Additionally, where development would occur adjacent to upland MHPA areas located along hillsides, future environmental review associated with the Hillside District CPIOZ would ensure consistency with Land Use Adjacency Guidelines including lighting requirements adjacent to the MHPA.</p>
<p>Barriers. New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.</p>	<p>Consistent. All MHPA land and land adjacent to the MHPA is located within one of the two CPIOZ areas identified within the CPU area. These areas are subject to supplemental development regulations that require a subsequent environmental review. Future environmental review associated with the CPIOZ would ensure consistency with Land Use Adjacency Guidelines including implementation of barriers, to ensure direct public access is discouraged from the MHPA area.</p>
<p>Invasives. No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.</p>	<p>Consistent. All MHPA land and land adjacent to the MHPA is located within one of the two CPIOZ areas identified within the CPU area. These areas are subject to supplemental development regulations that require a subsequent environmental review. Future environmental review associated with the CPIOZ would ensure consistency with Land Use Adjacency Guidelines to ensure no invasive non-native plant species are introduced into areas adjacent to the MHPA.</p>

Table 4.2-5: MHPA Land Use Adjacency Guidelines Consistency

<i>Land Use Adjacency Guideline</i>	<i>Consistency Determination</i>
<p>Brush Management. New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 and 3 will be combined into one zone (Zone 2) and may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is currently required by the City’s regulations. The amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.</p>	<p>Consistent. All MHPA land and land adjacent to the MHPA is located within one of the two CPIOZ areas identified within the CPU area. These areas are subject to supplemental development regulations that require a subsequent environmental review. Future environmental review associated with the CPIOZ would ensure consistency with Land Use Adjacency Guidelines related to brush management.</p>

Table 4.2-5: MHPA Land Use Adjacency Guidelines Consistency

<i>Land Use Adjacency Guideline</i>	<i>Consistency Determination</i>
<p>Noise. Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.</p>	<p>Consistent. All MHPA land and land adjacent to the MHPA is located within one of the two CPIOZ areas identified within the CPU area. These areas would be subject to supplemental development regulations that require a subsequent environmental review. Future environmental review associated with the CPIOZ would ensure consistency with Land Use Adjacency Guidelines related to exposure of wildlife to noise. Subsequent environmental review would typically require as a project condition the requirement for pre-construction bird surveys to occur to determine the presence or absence of breeding birds, if construction is proposed during bird breeding seasons. Alternatively, species presence can be assumed. If birds are present or their presence is assumed, noise attenuation and biological monitoring would be required that would ensure no adverse noise impacts would occur in or adjacent to the MHPA.</p>
<p>Grading/Land Development. Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.</p>	<p>Consistent. All MHPA land and land adjacent to the MHPA is located within one of the two CPIOZ areas identified within the CPU area. These areas are subject to supplemental development regulations that require a subsequent environmental review. Future environmental review associated with the CPIOZ would ensure consistency with Land Use Adjacency Guidelines to ensure construction limits remain outside the MHPA.</p>

Source: City of San Diego, 2019.

The proposed CPU would be generally consistent with existing MHPA preserve areas as existing preserve would remain planned as open space. Minor development within MHPA, such as footings for new pedestrian bridges (see Chapter 3: Project Description) are a consistent use within the MHPA. In addition, projects that could affect the MHPA would be required to comply with MHPA Land Use Adjacency Guidelines. Therefore, implementation of the proposed CPU would not result in a conflict with the provisions of an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan or local policy protecting biological resources. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

4.3 Geology, Soils, and Seismicity

This section assesses potential environmental impacts from future development under the proposed CPU as it relates to geology, soils, and seismicity, including those related to geologic and seismic hazards and soil stability. This evaluation is based on the Desktop Geological and Geologic Hazard Evaluation (The Bodhi Group, 2017) prepared for the Mission Valley Community Plan Update (see Appendix E).

4.3.1 Environmental Setting

4.3.1.1 PHYSICAL SETTING

Regional Geology

San Diego is located within the western (coastal) portion of the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges encompass an area that roughly extends from the Transverse Ranges and the Los Angeles Basin, south to the Mexican border, and beyond another approximately 800 miles to the tip of Baja California. The geomorphic province varies in width from approximately 30 to 100 miles, most of which is characterized by northwest-trending mountain ranges separated by subparallel fault zones. In general, the Peninsular Ranges are underlain by Jurassic-age metavolcanic and metasedimentary rocks and by Cretaceous-age igneous rocks of the southern California batholith. Geologic cover over the basement rocks in the western-most portion of the province in San Diego County generally consists of Upper Cretaceous-, Tertiary-, and Quaternary-age sedimentary rocks.

Structurally, the Peninsular Ranges are traversed by several major active faults. The Elsinore, San Jacinto, and the San Andreas faults are major active fault systems located northeast of San Diego and the Rose Canyon, San Diego Trough, Coronado Banks and San Clemente faults are major active faults located within or west-southwest of San Diego. Major tectonic activity associated with these and other faults within this regional tectonic framework is generally right-lateral strike-slip movement. These faults, as well as other faults in the region, have the potential for generating strong ground motions in the project area.

Local Geology and Soils

In increasing order of age, soils in the CPU area consist of artificial fill (both documented and undocumented), young alluvium, young colluvium, old alluvium, old paralic deposits (unit 6), and formational soils of the San Diego and Mission Valley Formations, Stadium Conglomerate, and the Friars and Scripps Formations, as shown in Figure 4.3-1. Descriptions of the general characteristics of these units are presented below.

- **Af – Artificial fill (late Holocene).** These consist of fill deposits resulting from human construction, mining, or quarrying activities. These include both documented and undocumented and/or nonengineered fill.
- **Qya – Young alluvial flood-plain deposits (Holocene and late Pleistocene).** Young alluvial floodplain deposits are characterized as poorly consolidated, poorly sorted, permeable floodplain deposits of sandy, silty, or clay-bearing alluvium. These deposits occur along the floodplain of the San Diego River down the central axis of Mission Valley.
- **Qyc – Young colluvial deposits (Holocene and late Pleistocene).** These consist of young poorly consolidated and poorly sorted sand and silt slope wash deposits and are mapped throughout the CPU area (dominantly on the south side of the valley).
- **Qoa – Old alluvial flood-plain deposits (late to middle Pleistocene).** These are dominantly fluvial sediments deposited on canyon floors consisting of moderately well consolidated, poorly sorted, permeable, commonly slightly dissected gravel, sand, silt, and clay-bearing alluvium. These deposits are present in portions of the eastern side of the valley (near the Stadium).
- **Qop6 – Old paralic deposits, Unit 6 (late to middle Pleistocene).** Unit 6 of the old paralic deposits is characterized as poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. These deposits are restricted to small areas on the north side of the CPU area.
- **Tsd – San Diego Formation, undivided (early Pleistocene and late Pliocene).** The San Diego Formation is characterized as predominantly yellowish-brown and gray, fine- to medium-grained, poorly indurated fossiliferous marine sandstone and reddish-brown transitional marine and nonmarine pebble and cobble conglomerate, both divided and undivided. Undivided portions of the formation are exposed on the southern slopes of Mission Valley.
- **Tmv – Mission Valley Formation (middle Eocene).** The Mission Valley Formation is present throughout the CPU area but it is most exposed on the northern flank of Mission Valley. It consists predominantly of light olive-gray, soft and friable, fine- to medium-grained marine and non-marine sandstone containing cobble conglomerate tongues. The Mission Valley Formation has a maximum thickness of nearly 200 feet.

- **Tst – Stadium Conglomerate (middle Eocene).** The Stadium Conglomerate is present throughout the Mission Valley area but it most exposed on the northern flank of the valley. It consists of massive cobble conglomerate with a dark-yellowish brown, coarse-grained sandstone matrix. The conglomerate contains slightly metamorphosed volcanic and volcanoclastic rocks and quartzite. The Stadium Conglomerate is approximately 150 feet thick at its type section, located near the Stadium.
- **Tf – Friars Formation (middle Eocene).** This formation consists of yellowish-gray, medium-grained, massive, poorly indurated non-marine and lagoonal sandstone and claystone with tongues of cobble conglomerate. Within the CPU area it is exposed on the north side of Mission Valley at its eastern end.
- **Tsc – Scripps Formation (middle Eocene).** The Scripps Formation is present throughout the CPU area but it most exposed on the northern flank of the valley. It consists of pale-yellowish-brown, medium-grained sandstone with some interbedded cobble-conglomerate.

Seismic and Geologic Hazards

The City of San Diego Seismic Safety Study documents the City's known and suspected geologic hazards and faults. The 2008 updated Seismic Safety Study maps potential hazards and rates them by relative risk, on a scale from nominal to high. The CPU area encompasses all or portions of map sheets 21, 22, 26, and 27 of the City of San Diego Seismic Safety Study. Identified hazards are described below.

Faults and Seismicity

Southern California is one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. Portions of the City of San Diego are located above active strands of the Rose Canyon Fault. Other active faults in the region include the San Andreas, San Jacinto, Elsinore, Coronado Bank, San Clemente, and San Diego Trough faults. Regional faults are shown in Figure 4.3-2.

An active fault is defined by the State Mining and Geology Board as one that has experienced surface displacement within the Holocene epoch, i.e., during the last 11,000 years. The CPU area is subject to potential ground shaking caused by activity along faults located within and near the CPU area. The Rose Canyon Fault can produce a magnitude 7.2 earthquake. Portions of the Elsinore and San Jacinto Fault zones, located east of San Diego, have the capacity to produce earthquakes at maximum magnitudes from 6.4 to 7.2.

Ground Shaking

Ground shaking during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and the type of geologic material underlying the area. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Areas that are underlain by bedrock tend to experience less ground shaking than those underlain by unconsolidated sediments such as artificial fill or unconsolidated alluvial fill.

As noted, the CPU area is subject to ground shaking hazards caused by earthquakes on regional active faults. The CPU area is located in a zone where the horizontal peak ground acceleration has a 10 percent probability of exceedance in 50 years, ranging from 0.450g (where g represents the acceleration of gravity) to 0.582g,¹ based on a Probabilistic Seismic Hazards Ground Motion Interpolator provided by the California Department of Conservation. Within the CPU area, the higher value occurs at the west end and the lower value occurs at the east end.

Surface Fault Rupture

Surface fault rupture is the result of movement on an active fault reaching the surface. The Rose Canyon fault is the most significant active fault near the CPU area. The Rose Canyon fault is capable of producing a magnitude 7.2 earthquake. Active portions of the Rose Canyon fault, some of which are concealed, are located within and near the western end of the CPU area and are capable of rupturing the ground surface during a large earthquake on the Rose Canyon fault zone. In addition, several faults are noted as being “Potentially Active, Inactive, Presumed Inactive, or Activity Unknown” that lie within the CPU area. Areas underlain by north-south trending faults in this category are located on the south side of Mission Valley near Texas Street and between Mission Center Road and Interstate (I-) 805; and on the north side of Mission Valley near the intersection of I-15 and Friars Road.

Liquefaction, Seismically Induced Settlement, and Lateral Spread

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction. Areas with liquefaction potential are shown in Figure 4.3-3.

Liquefaction-induced ground failure can involve a complex interaction among seismic, geologic, soil, topographic, and groundwater factors. Failures can include ground fissures, sand boils, ground settlement, and loss of bearing strength; buoyancy effects; ground oscillation; flow failure; and complex lateral spread landslides. The three key factors that indicate whether an area is potentially susceptible to liquefaction are the capacity for severe ground shaking, shallow groundwater, and low-density granular deposits (mainly finer grained sands). In these areas, where alluvium is sufficiently loose and groundwater is sufficiently shallow that strong earthquake shaking could cause sediments to lose bearing capacity, severe settlement of surface facilities and in some cases uplift of buried structures (e.g., large pipelines) could occur.

1. Peak ground acceleration is used to measure the effect of an earthquake on the ground. For example, 0.001 g is perceptible by people, 0.02 g causes people to lose their balance, and 0.5 g is very high but buildings can survive if the duration is short and if the mass and configuration has enough damping (Lorant, 2016).

Figure 4.3-1: Regional Geology

ABBREVIATED EXPLANATION
Approximate stratigraphic relationships only; see pamphlet and CMU (Plate 2) for more detailed information

MODERN SURFICIAL DEPOSITS

- af Artificial fill (late Holocene)
- Dw Wash deposits (late Holocene)
- Qls Landslide deposits, undivided (Holocene and Pleistocene)
- Qmc Marine beach deposits (late Holocene)
- Qpe Peralic estuarine deposits (late Holocene)
- Qmo Undivided marine deposits in offshore region (late Holocene)
- Qcf Canyon fill deposits in offshore region (late Holocene)

YOUNG SURFICIAL DEPOSITS

- Qya Young alluvial flood-plain deposits (Holocene and late Pleistocene)
- Qyc Young colluvial deposits (Holocene and late Pleistocene)
- Qct Undivided canyon terrace deposits in offshore region (Holocene and Pleistocene)

OLD SURFICIAL DEPOSITS

- Qoa Old alluvial flood-plain deposits, undivided (late to middle Pleistocene)
- Qop Old peralic deposits, undivided (late to middle Pleistocene)

VERY OLD SURFICIAL UNITS

- Qvop Very old alluvial flood-plain deposits, undivided (middle to early Pleistocene)
- Qvop Very old peralic deposits, undivided (middle to early Pleistocene)

SEDIMENTARY AND VOLCANIC BEDROCK UNITS

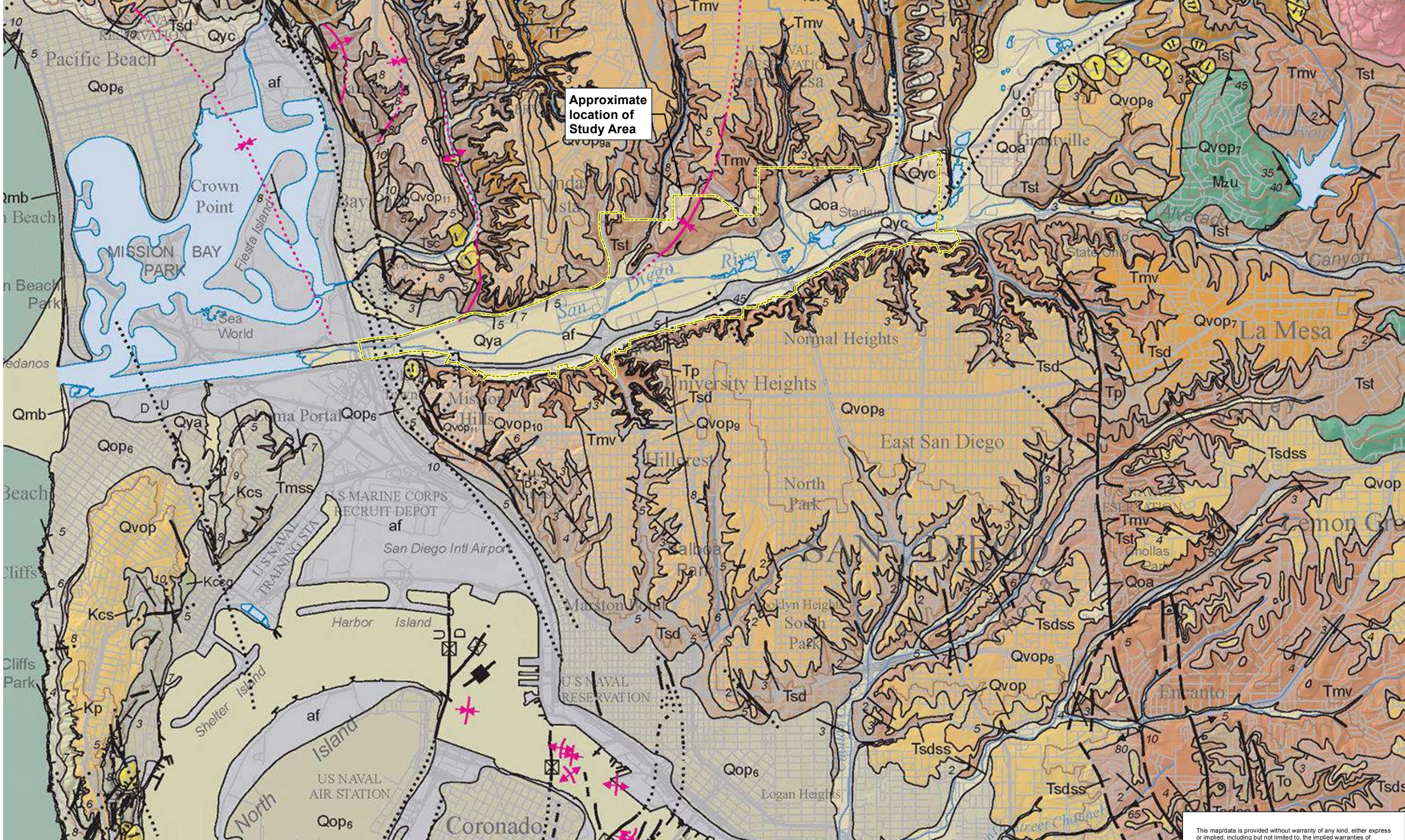
- Qmb Undivided sediments and sedimentary rocks in offshore region (Holocene, Pleistocene, Pliocene and Miocene)
- Tsd San Diego Formation (early Pleistocene and late Pliocene)
 - Tsd-undivided
 - Tsdg transitional marine and nonmarine pebble and cobble conglomerate
 - Tsdss marine sandstone
- Tm Basaltic-andesite dike (Miocene)
- Tmv Undivided sedimentary rocks in offshore region (Miocene)
- Tmss Undivided volcanic rocks in offshore region (Miocene)
- Tmsr Undivided volcanic and sedimentary rocks in offshore region (Miocene)
- Tp Clay Formation (late Eocene)
- Qpomerado Pomerado Conglomerate (middle Eocene)
- Tpm Miramar Sandstone Member
- Qmission Mission Valley Formation (middle Eocene)
- Qstadium Stadium Conglomerate (middle Eocene)
- Qfrans Frans Formation (middle Eocene)
- Qscripps Scripps Formation (middle Eocene)
 - Tecu - upper unit
- Qandath Andath Shale (middle Eocene)
- Qtoney Toney Sandstone (middle Eocene)
- Qdelmar Delmar Formation (middle Eocene)
- Qdelmar Delmar Formation and Frans Formation, undivided (middle Eocene)
- Qmount Mount Soledad Formation (middle Eocene)
 - Tmas - sandstone
 - Tmss - cobble conglomerate
- Qundivided Undivided Eocene rocks in offshore region (Eocene)
- Qcabrillo Cabrillo Formation (Upper Cretaceous)
 - Kcs - sandstone
 - Kccg - cobble conglomerate
- Qpoint Point Loma Formation (Upper Cretaceous)
- Qlusardi Lusardi Formation (Upper Cretaceous)
- Qundivided Undivided rocks of the Rosario Group in the offshore area (Upper Cretaceous)

UNNAMED CRETACEOUS ROCKS OF THE PENINSULAR RANGES BATHOLITH

- Qgr Granodiorite and tonalite, undivided (mid-Cretaceous)
- Qgr Granodiorite, undivided (mid-Cretaceous)
- Qkt Tonalite, undivided (mid-Cretaceous)
- Qkd Diorite, undivided (mid-Cretaceous)
- Qkh Hypabyssal rocks, undivided (mid-Cretaceous)

JURASSIC AND CRETACEOUS METAMORPHOSED AND UNMETAMORPHOSED VOLCANIC AND SEDIMENTARY ROCKS

- Qm Metamorphosed and unmetamorphosed volcanic and sedimentary rocks, undivided (Mesozoic)
- Qmo Undivided metamorphic rocks in offshore region (Mesozoic)



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Data Source: City of San Diego, 2015; SANGIS Regional GIS Data Warehouse, 2015. (www.sangis.org)
Dyett & Bhatia, 2015

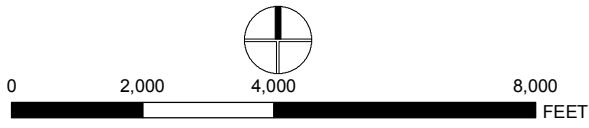
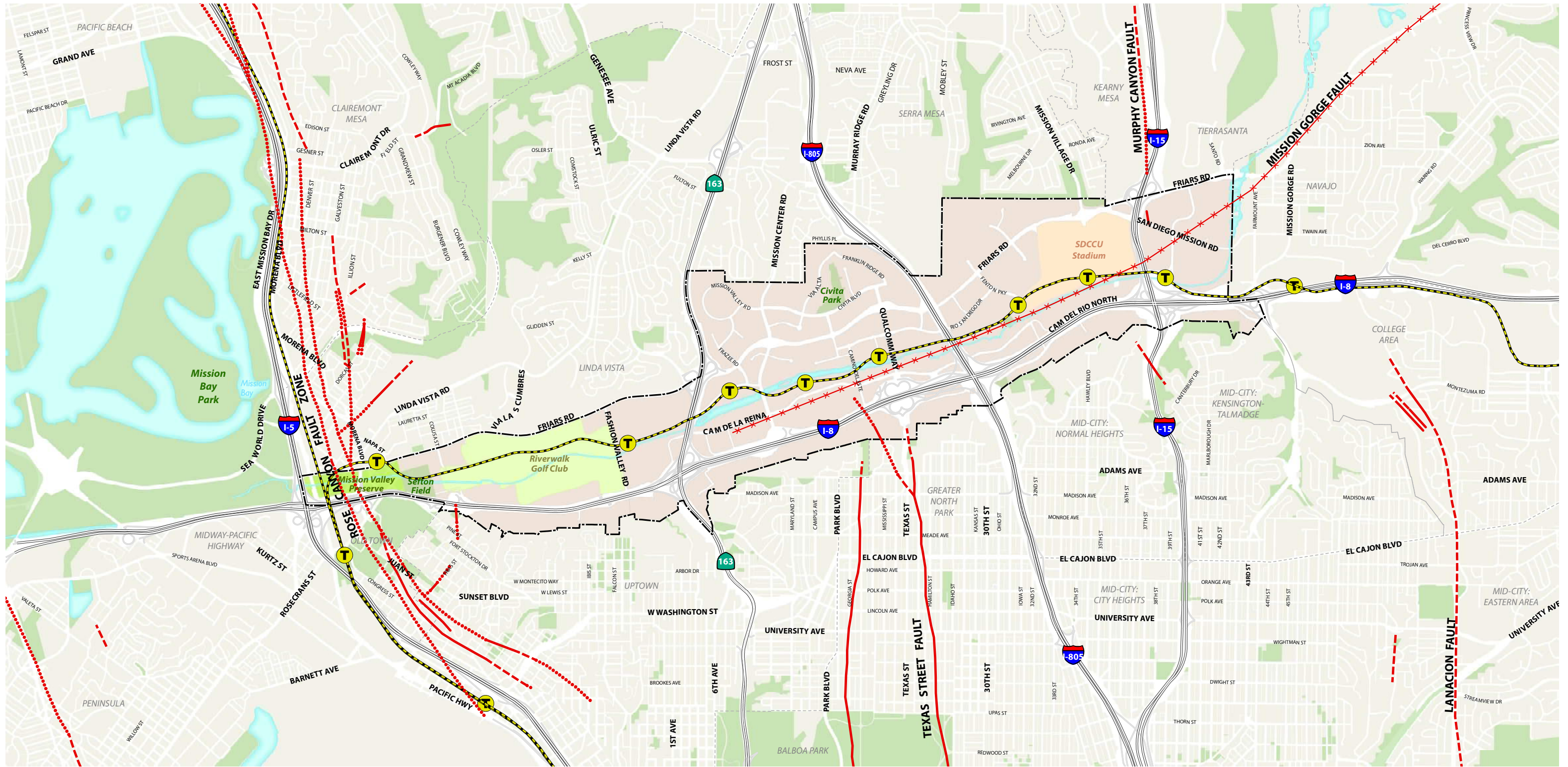


Figure 4.3-2: Faults



- Trolley Stops
- Light Rail
- Freeways
- Ramps
- Streams/Creeks
- Fault
- Inferred Fault
- Concealed Fault
- Uncertain Fault (queried as existence not conclusively established)
- Lakes/Ponds/Bays
- Parks
- Mission Valley Community Plan Boundary
- Community Planning Areas

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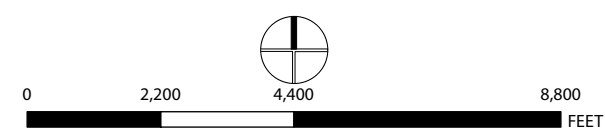
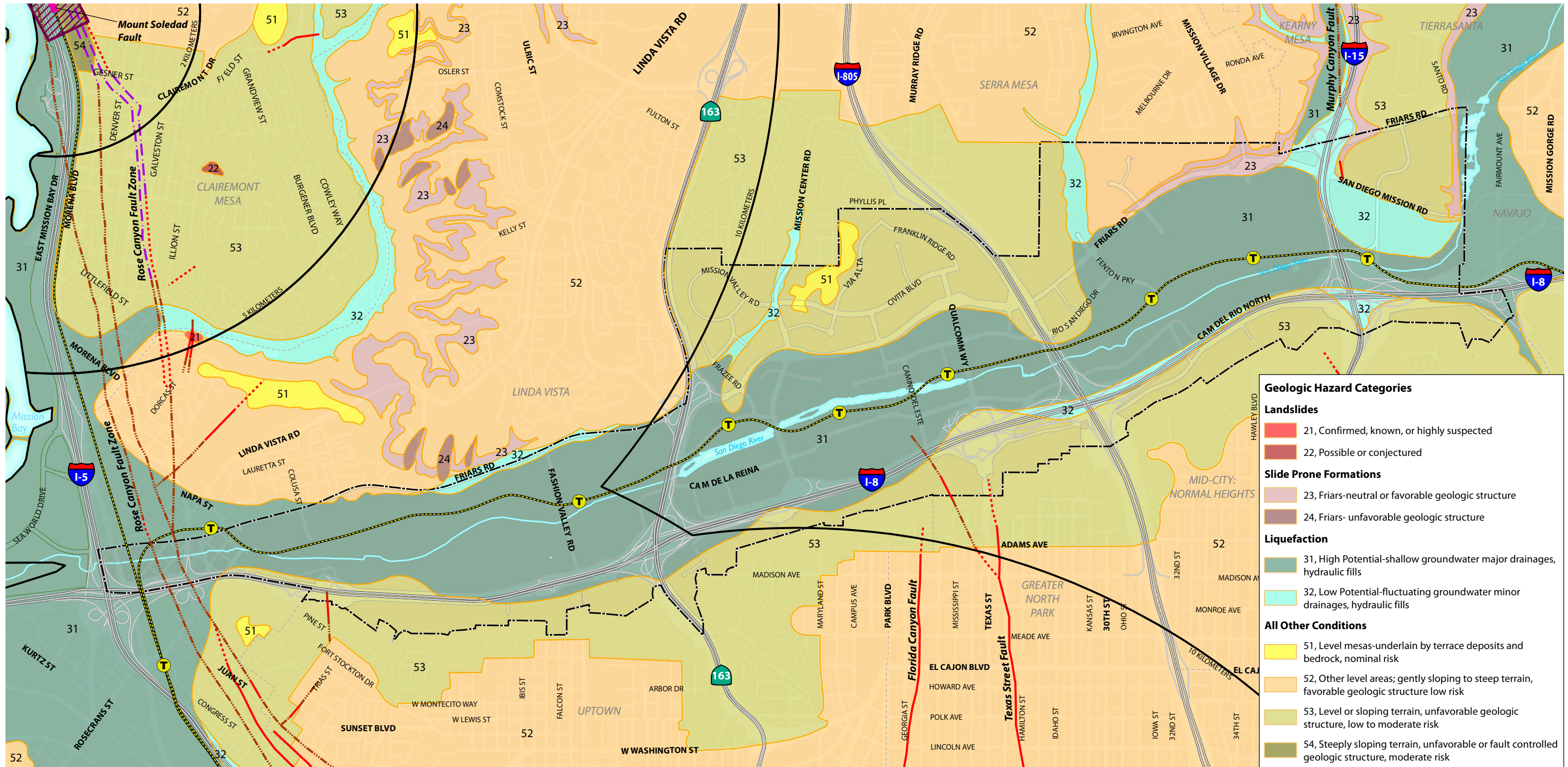


Figure 4.3-3: Geological Hazards



Seismic Hazards

- Active Fault
- Near Source Shaking Zone
- Alquist-Priolo Fault Zone

Earthquake Faults

- Fault
- Inferred Fault
- Concealed Zone
- Shear Zone

Trolley Stops

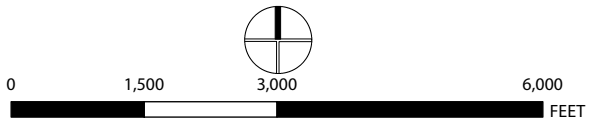
- Trolley Stops
- Light Rail
- Freeways
- Ramps
- Streams/Creeks

Mission Valley Community Plan Boundary

- Mission Valley Community Plan Boundary
- Community Planning Areas

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Among the potential hazards related to liquefaction are seismically induced settlement and lateral spread. Seismically induced settlement is caused by the reduction of shear strength due to loss of grain-to-grain contact during liquefaction, and may result in dynamic settlement on the order of several inches to several feet. Lateral spreading of the ground surface during an earthquake usually takes place along weak shear zones that have formed within a liquefiable soil layer. Lateral spreading has generally been observed to take place in the direction of a free-face (i.e., retaining wall, slope, channel, etc.) but has also been observed to a lesser extent on ground surfaces with gentle slopes. For sites located in proximity to a free-face, the amount of lateral ground displacement is strongly correlated with the distance of the site from the free-face. Other factors such as earthquake magnitude, distance from the earthquake epicenter, thickness of the liquefiable layers, and the fines content and particle sizes of the liquefiable layers will also affect the amount of settlement or lateral ground displacement.

Slope Instability

Slopes steeper than 2:1 (horizontal:vertical) are susceptible to landslides or slope failure. Slope failure is dependent on topography and underlying geologic materials, as well as factors such as rainfall, excavation, or seismic activities that can precipitate slope instability. Earthquake motions can induce significant horizontal and vertical dynamic stresses along potential failure surfaces within a slope.

Landslide hazards are mapped both by the State of California and the City of San Diego. The State of California and City of San Diego use differing systems to indicate the severity of the landslide hazard, and the categories used by the two systems are not coincident. According to the State of California (Tan, 1995), most of the CPU area is classified as being marginally susceptible to landsliding (Designation 2). However, some portions of the CPU area are classified as being generally susceptible or most susceptible to landsliding (Designations 3-1, 3-2, 4-1 and 4-2). These generally susceptible or most susceptible areas occur on the slopes on both the north and south sides of Mission Valley.

According to the City of San Diego Seismic Safety Study, most sloping portions of the CPU area are mapped as being at low to moderate risk for landsliding (Hazard Categories 51, 52, and 53). However, some areas (dominantly on the eastern side of the CPU area) appear to be underlain by the potentially slide-prone Friars Formation exhibiting neutral or favorable geologic structure (Hazard Category 23). Areas with potential landslide hazards are shown in Figure 4.3-3.

Soil Erosion, Expansive Soils, and Settlement or Subsidence

The potential for soil erosion is variable throughout the CPU area. Erosion is most likely on sloped areas with exposed soil, especially where unnatural slopes are created by cut-and-fill activities. However, the potential for soil erosion is reduced once the soil is vegetated or graded and covered with concrete, structures, or asphalt.

Expansive soils are characterized by significant volume changes (shrink or swell) due to variations in moisture content. Expansion of the soil may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or

other factors. Soils with a relatively high fines content (clays dominantly) are generally considered expansive or potentially expansive. These soils may be found in areas underlain by the Friars Formation and in areas underlain by young colluvial or undocumented fill soils.

4.3.1.2 REGULATORY SETTING

State Regulations

Earthquake Fault Zoning Act (Alquist-Priolo Act)

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the Act, the State Geologist has established regulatory zones (known as Earthquake Fault Zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report, prepared by a geologist registered in the State of California, that is directed to the problem of potential surface fault displacement through a project site. The Rose Canyon fault zone crosses the westernmost portion of the CPU area.

California Building Code

The California Building Code (CBC), also known as the California Building Standards Code, is included in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code (IBC), a model building code adopted across the United States. Through the CBC, the State provides a minimum standard for building design and construction. The CBC contains specific requirements for seismic safety, foundations, retaining walls, and site demolition. The CBC also includes provisions for grading, including drainage and erosion control.

The CBC has been amended and adopted by reference in Chapter 14, Article 5 of the City of San Diego Municipal Code (SDMC), which is the Building Regulations for the City.

California Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, passed in 1990, addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. Under this act, seismic hazard zones are to be mapped by the State Geologist to assist local governments in land use planning. The act states that it is a necessity to identify and map seismic hazards so that cities and counties can adequately prepare the safety element of their general plan as well as encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. According to Section 2697(a) of the act, cities and counties shall require a geotechnical report defining and delineating any seismic hazard related to a project, prior to the approval of any project located in a seismic hazard zone.

Local Regulations

City of San Diego Seismic Safety Study

The San Diego Seismic Safety Study includes geologic hazards and fault maps of the City. Areas of the City are identified by geologic hazard category, which reflects the geologic hazard type and related risks. These are generalized maps, and site-specific geologic/geotechnical investigations may be necessary for proposed development or construction. The City's Land Development Code (LDC) ~~Section 145.1803~~ describes when a geotechnical investigation is required, and City of San Diego Development Services Information Bulletin 515 describes the minimum submittal requirements for geotechnical and geological reports that may be required for development permits, subdivision approvals, or grading permits. The CPU area includes the following geologic hazard categories:

- Fault Zones
 - 12 – Potentially Active, Inactive, Presumed Inactive, or Activity Unknown. This category represents an area 100 feet on both sides of mapped faults and is an overlay on top of other hazard categories.
- Slide-Prone Formations
 - 23 – Friars: neutral or favorable geologic structure. This category covers some small areas along I-15 and the eastern edge of the CPU area.
- Liquefaction
 - 31 – High Potential – shallow groundwater major drainages, hydraulic fills. This category covers much of the valley floor surrounding the San Diego River.
 - 32 – Low Potential – fluctuating groundwater minor drainages. This category covers small portions of the valley along the outer edges of the category 31 areas.
- Other Terrain
 - 51 – Level mesas – underlain by terrace deposits and bedrock nominal risk. This category covers a small area at Civita Boulevard and Mission Center Road.
 - 53 – Level or sloping terrain, unfavorable geologic structure, low to moderate risk. This category covers the edges of the CPU area.

Geologic Hazard Categories in the CPU area are shown in Figure 4.3-3.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdiction coordination.

The MJHMP identifies coastal storms/erosion/tsunamis, dam failure, earthquakes, and landslides among the top hazards in the City of San Diego due to the potential loss of life, injuries, and damage

to property, as well as the significance in the disruption of services. The MJHMP includes six goals for the City of San Diego, including the following related to geologic and seismic hazards:

- Goal 1.** Promote public understanding, support, and demand for hazard mitigation.
- Goal 2.** Improve hazard mitigation coordination and communication with federal, state, local, and tribal governments.
- Goal 3.** Reduce the possibility of damage and losses to people, critical facilities/infrastructure, and State-owned facilities, due to wildfire/structural fire, coastal storms/erosion/tsunami, landslide, hazardous materials, and other manmade hazards.
- Goal 5.** Reduce the possibility of damage and losses to people, critical facilities/infrastructure and State-owned facilities due to earthquake and dam failure.

City of San Diego Land Development Code

The City's LDC sets forth the regulations that apply to the development of land in the City, and comprises Chapters 11, 12, 13, 14 and 15 of the SDMC. The LDC describes situations where grading permits are needed, which include grading within a 100-year floodplain or which changes the existing drainage pattern; for grading, geotechnical investigations, well drilling, or agricultural activity on environmentally sensitive lands or on properties with historical resources; for any activity that disturbs soil or vegetation in environmentally sensitive land; if grading is being performed as a condition of a development permit or for restoring damage caused by illegal grading; if the grading is within privately owned open space easements or City-owned open space; for modification of slope on a canyon or excavation of a hillside; for grading of any non-environmentally sensitive land of 1 acre or more; or for fill with more than 5 percent broken concrete, asphalt, masonry or construction debris, or with any single piece larger than 12 inches in any direction.

City of San Diego Building Regulations

The City's Building Regulations (Chapter 14, Article 5) are intended to regulate the construction of applicable facilities and encompasses (and formally adopts) associated elements of the CBC. Specifically, this includes guidelines regulating the "construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within this jurisdiction, except work located primarily in a public way, public utility towers and poles, mechanical equipment not specifically regulated in the Building Code, and hydraulic flood control structures."

City of San Diego General Plan

The goals of the Seismic Safety Element of the General Plan are the protection of public health and safety through abated structural hazards and mitigated risks posed by seismic hazards and development that avoids inappropriate land uses in identified seismic risk areas. The policies of the Seismic Safety Element of the General Plan are intended to protect public health and safety

through the application of effective seismic, geologic, and structural considerations. In addition, the policy is to maintain or improve the integrity of existing and proposed construction.

4.3.2 Impact Analysis

4.3.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts to geologic conditions are based on the City of San Diego's CEQA Significance Determination Thresholds (2016), which have been modified to reflect a programmatic analysis for the proposed CPU. A significant impact to geology, soils, and seismicity could occur if implementation of the proposed CPU would:

- 1) Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;
- 2) Result in substantial increase in wind or water erosion of soils, either on or off the site;
- 3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or
- 4) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

This section does not include an analysis related to the capacity of soils to support septic tanks or alternative wastewater disposal systems, since sewers are available throughout the CPU area.

4.3.2.2 METHODOLOGY AND ASSUMPTIONS

Potential impacts resulting from implementation of the proposed CPU were evaluated based on relevant information from the California Department of Conservation, the California Geological Survey, and the City of San Diego Seismic Safety Study. Based on a review of relevant maps and geologic documentation, the analysis presents the potential for geological impacts to occur within the CPU area.

Because site conditions may change and additional data may become available, data reported and conclusions drawn in this section are limited to current conditions and may not be relied upon on a significantly later date or if changes have occurred in the CPU area. Reasonable efforts were made during the Study to identify geologic hazards. "Reasonable efforts" are limited to information gained from information readily-accessible to the public. Such methods may not identify geologic or geotechnical issues that are not listed in these sources.

4.3.2.3 IMPACTS

Impact 4.3-1: Seismic Hazards

Would the proposed CPU expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?

Seismic hazards are present in the CPU area, thus implementation of the proposed CPU could expose people or structures to seismic hazards such as fault rupture, ground shaking, and ground failure.

Although the CPU area is not within a State of California Earthquake Fault Zone, strands of the active Rose Canyon fault underlie the western end of the CPU area, categorized by the City as Hazard Category 12 (Potentially Active, Inactive, Presumed Inactive, or Activity Unknown). In addition, there are several other Hazard Category 12 faults within the CPU area. The CPU area could be subject to ground shaking in the event of an earthquake along faults in the vicinity and in the Southern California/Northern Baja California region.

Fault rupture is primarily a hazard in areas underlain by faults. As noted, faults in the CPU area have been mapped by the City of San Diego and have been overlaid with the Hazard Category 12 buffer of 100 feet on either side of each fault. Geotechnical investigations are required for proposed subdivisions and structures for human occupancy (2000 person hours per year) within these zones.

Seismically-induced ground failure, such as liquefaction or landslides, have the highest potential in portions of the CPU area identified by the City as slide-prone (Hazard Category 23) or with liquefaction potential (Hazard Category 31 or 32). Portions identified as “level or sloping terrain, unfavorable geologic structure” underlying the CPU area (Hazard Category 53) may also have low to moderate risk of instability. Geotechnical studies are required for proposed subdivisions and most development proposed in areas with liquefaction potential (Hazard Categories 31 and 32), and conditionally in all other areas present in the CPU area. Additionally, geotechnical reports are required for grading permits.

Where geotechnical investigations identify potential geologic hazards, including potential for surface fault rupture, liquefaction, or ground failure, the reports are required to contain appropriate recommendations for hazard mitigation to be incorporated into the design of the project before issuance of a building permit. No building permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards.

The Rose Canyon fault is the active fault considered having the most significant effect from a design standpoint due to its location near the CPU area. Thus, there is potential for damage from ground shaking throughout the CPU area.

The Building Regulations include regulations for structural design intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. Seismic design of future structures would be evaluated in accordance with the 2016 CBC guidelines or those currently adopted by the City of San Diego. Furthermore, as stated above, no building permit shall be issued for construction

where a geotechnical investigation establishes that construction of buildings or structures would be unsafe because of geologic hazards. New building construction would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards and require that a geotechnical investigation be conducted for non-exempt new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803).

Thus, while the CPU area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, or landslides would be reduced to less than significant through implementation of site-specific geotechnical requirements from the SDMC and the CBC.

Additionally, the proposed CPU includes a series of policies intended to minimize potential seismic and related geologic risks to new development, ensuring design to mitigate ground shaking, requiring setbacks from faults, mitigating liquefaction hazards and landslide hazards, and other policies to reduce risks by preventing future development from decreasing slope stability through clearing and grading.² Proposed Implementing Actions also seek to reduce impacts from seismic events by encouraging geotechnical investigations in support of proposed development or construction projects, maintaining and improving seismic resilience of structures by facilitating seismic retrofits, and enforcing construction standards ~~identifying critical infrastructure and structural vulnerabilities and retrofitting development and enforcing existing seismic design regulations.~~³

Therefore, with adherence to the SDMC, CBC and other regulatory requirements, and implementation of the proposed CPU, impacts related to geologic hazards would be reduced to an acceptable level of risk.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.3-2: Erosion or Loss of Topsoil

Would the proposed CPU result in substantial increase in wind or water erosion of soils, either on or off the site?

The CPU area consists of mainly developed and previously graded land with some minimal open space areas. Implementation of the proposed CPU would allow for the intensification of some land uses that could lead to construction and grading activities that could temporarily expose topsoil and increase soil erosion from water and wind. Development of parcels within the CPU area could remove the existing pavement and cover, thereby exposing soils to potential runoff and erosion during construction if protective measures are not taken.

² See Policies for Development GSH-1 through GSH-5.

³ See Implementing Actions IA-81 through IA-83.

SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibit sediment and pollutants from leaving the work site and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 (Storm Water Runoff Control and Drainage Regulations) that address the development's potential erosion and sedimentation impacts. For projects that disturb less than one acre of land, a Water Pollution Control Plan (WPCP) is required to identify the pollution prevention measures that will be taken. The WPCP is required to depict the Best Management Practices (BMPs) to be implemented during construction to reduce/eliminate discharges of pollutants to the storm drain conveyance system. The WPCP shall include, but not be limited to, erosion and sediment control BMPs, phased grading, good housekeeping measures, and site and material management.

Conformance to such mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan (SWPPP) that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions. Compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development.

In addition, policies GSH-1- through 5 and the Hillside Conservation, Design, and Height Limitation CPIOZ would further limit the contribution of future development to erosion of soils in the CPU area by maintaining natural contours, limiting disruption to hillsides, phasing grading activities, requiring runoff control measures during construction, and rehabilitating hillsides as needed. Thus, with adherence to existing regulations and implementation of the proposed CPU, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.3-3: Geologic Instability

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

The majority of the CPU area is mapped by the Seismic Safety Study as Geologic Hazard Category 31, characterized as having a high potential for liquefaction, with some areas categorized as 32, characterized as having low potential for liquefaction, but where conditions could support liquefaction. As noted, liquefiable soils can settle or spread as a result of an earthquake.

Slide-prone formations identified in the CPU area are limited to small areas in the eastern portion near I-15 in Geologic Hazard Category 23, Friars, with neutral or favorable geologic structure. Risk of instability is low to moderate in areas categorized as 53, which is much of the remaining land in the CPU area outside of the areas categorized as 31 and 32. The risk of slope instability is low in the small area categorized as 51.

Geotechnical studies are required to be conducted for subdivisions and development proposed in areas with liquefaction potential (hazard categories 31 and 32), and conditionally in all other hazard categories present in the CPU area. Geotechnical reports are required for all grading permits. Geotechnical investigation reports are required for most proposed buildings per the SDMC and Bulletin 515 (Section 145.1803). Where geologic hazards are identified, reports are required to contain appropriate recommendations for hazard mitigation to be incorporated into the design of the project before issuance of a building permit. No building permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. Thus, while the potential for geologic or soil instability exists in the CPU area, site-specific geotechnical investigations required for future projects would identify any such potential hazards, and provide recommendations to reduce the potential hazards to an acceptable level of risk.

Proposed CPU policies and Implementing Actions intended to address liquefaction and other geologic and seismic hazards through recommendations regarding replacing vulnerable soils, avoiding landslides, and enforcing seismic design provisions ~~would serve to further reduce potential impacts.~~⁴

Thus, with adherence to existing SDMC, CBC, and other regulations, ~~and implementation of the proposed CPU,~~ potential impacts associated with liquefaction and other geologic and seismic hazards should be reduced to an acceptable level of risk.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

⁴ See Policies for Development GSH-1 through GSH-5 and Implementing Actions IA-81 through IA-83.

Impact 4.3-4: Expansive Soils

Would the proposed CPU be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994)?

Expansive soils generally contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. This shrinking and swelling of the soil can cause damage to slabs, foundations, and concrete flatwork. Clay composition can be found in the alluvial soils of the CPU area surrounding the San Diego River.

While the potential for expansive soils exists in the CPU area, site-specific geotechnical investigations required for future projects should identify expansive soils and recommend measures to mitigate potential impacts. Potential impacts from expansive soils will be reduced through mandatory conformance with applicable regulatory requirements and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

4.4 Greenhouse Gas Emissions and Energy

This section addresses the potential significant impacts related to greenhouse gas (GHG) emissions due to the implementation of the proposed CPU. This section describes the existing conditions related to GHG emissions in the CPU area, and provides a summary of relevant plans, policies, and regulations. The analysis incorporates estimates of annual GHG emissions associated with buildout of the proposed CPU calculated using California Emissions Estimator Model (CalEEMod; California Air Pollution Control Officers Association [CAPCOA], 2016) and the California Air Resources Board's (CARB) Emission Factor model (EMFAC; CARB, 2014). CalEEMod and EMFAC results are included in the Air Quality Technical Report (Appendix C).

This section also evaluates potential impacts to energy conservation in accordance with Appendix F of the California Environmental Quality Act (CEQA) Guidelines and federal, State, and regional regulations. The energy conservation analysis consists of a summary of the energy regulatory framework, the existing conditions within the CPU area, a discussion of the proposed CPU's potential impacts on energy resources, and identification of the proposed CPU design features/policy framework that may reduce energy consumption.

4.4.1 Environmental Setting

4.4.1.1 PHYSICAL SETTING

The CPU area is currently a source of anthropogenic GHG, with emissions generated by vehicular traffic and by the energy use, area sources, water use, and solid waste disposal practices of existing development.

State and Regional GHG Inventories

California Air Resource Board Inventory

The California Air Resource Board (CARB) conducts statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high global warming potential (GWP) emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in million metric tons of carbon dioxide equivalent (MMT CO₂E). Table 4.4-1 shows the estimated statewide GHG emissions for the years 1990, 2010, and 2016. Although GHG inventories are available for each year through 2016, these years (1990, 2010, and 2016) are highlighted in Table 4.4-1 because 1990 is the baseline year for established reduction targets, 2010 corresponds to the year for which inventory data for the City is available, and 2016 is the most recent data available.

As shown in Table 4.4-1, statewide GHG source emissions totaled approximately 427 MMT CO₂E in 1990, 448 MMT CO₂E in 2010, and 429 MMT CO₂E in 2016. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. CARB has adopted multiple GHG emission reduction measures, and most of the reductions since 2008 have been driven by economic factors (recession), previous energy-efficiency actions, and the Renewables Portfolio Standard (RPS). Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric carbon dioxide (CO₂; sinks) by photosynthesis, which is then bound (sequestered) in plant tissues.

Table 4.4-1: California GHG Emissions by Sector in 1990, 2010, and 2015

Sector	1990 Emissions in MMT CO ₂ E (% total) ²	2010 Emissions in MMT CO ₂ E (% total) ²	2016 Emissions in MMT CO ₂ E (% total) ²
Electricity Generation	110.6 (25.9%)	90.58 (20.2%)	68.95 (16.1%)
Transportation	150.7 (35.3%)	170.16 (38.0%)	174.01 (40.5%)
Industrial	103.0 (24.2%)	100.93 (22.5%)	100.37 (23.4%)
Commercial	14.4 (3.4%)	20.09 (4.5%)	23.04 (5.4%)
Residential	29.7 (7.0%)	31.26 (7.0%)	28.34 (6.6%)
Agriculture & Forestry	16.9 (4.0%)	34.27 (7.6%)	33.84 (7.9%)
Not Specified	1.3 (0.3%)	0.82 (0.2%)	0.79 (0.2%)
Total⁴	426.6	448.11	429.34

Notes:

1. 1990 data was obtained from the CARB 2007 source and are based on the Intergovernmental Panel on Climate Change (IPCC) second assessment report GWPs. The revised calculation, which uses the scientifically updated IPCC fifth assessment report GWPs, is 431 MMT CO₂E.
2. Percentages may not total 100 due to rounding.
3. 2010 and 2016 data was retrieved from the CARB 2018 source.
4. Totals may vary due to independent rounding.

Sources: CARB, 2007 and 2018.

City of San Diego Climate Action Plan Inventory

A regional emissions inventory prepared as part of the City’s CAP reported GHG emissions totaling approximately 13 MMT CO₂E in 2010. Table 4.4-2 summarizes the sources and quantities of City emissions. The largest source of emissions is transportation, followed by electricity, natural gas, solid waste and wastewater, and water.

Table 4.4-2: City of San Diego GHG Emissions in 2010

Sector	2010 GHG Emissions (MT CO ₂ E)
Transportation	7,141,746 (55%)
Electricity	3,116,398 (24%)
Natural Gas	2,077,599 (16%)
Solid Waste and Wastewater	389,550 (3%)
Water	259,700 (2%)
Total	12,984,993

Source: City of San Diego, 2015a.

Existing CPU Area GHG Emissions

The CPU area is largely developed and is currently a source of GHG emissions. Existing (2018) emissions in the CPU area were calculated using CalEEMod and EMFAC, and the results are summarized in Table 4.4-3. CalEEMod and EMFAC output is included as an appendix to the Air Quality Report.

Table 4.4-3: Existing (2018) CPU Area GHG Emissions

Emission Source	GHG Emissions (MT CO ₂ E per year)
Mobile Sources	269,737
Energy Use	91,429
Area Sources	8,158
Water Use	15,077
Solid Waste Disposal	9,323
Total	393,725

Source: Air Quality Report, Appendix C.

Energy Usage

San Diego Gas & Electric (SDG&E) currently provides natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities' customers have safe and reliable utility service. The project's energy needs would be supplied through the various combinations of energy resources available within the project area, and the analysis in this section takes into account the anticipated future SDG&E energy resource use patterns.

As directed by the California RPS in Senate Bill (SB) 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33 percent renewable energy mix by 2020. Table 4.4-4 summarizes the SDG&E power mix as of 2016. As shown, SDG&E used biomass, solar, and wind sources, and obtained 43 percent of its energy from renewable resources in 2016 (SDG&E, 2018).

Table 4.4-4: SDG&E 2016 Power Mix

<i>Energy Source</i>	<i>Power Mix (%)</i>
Renewables	43
<i>Biomass</i>	1
<i>Solar</i>	21
<i>Wind</i>	21
Natural Gas and Unspecified	57

Source: SDG&E, 2018.

SDG&E supplies customers with electricity generated both locally and outside of the utility's service territory, with local facilities currently capable of generating a total of approximately 3,100 megawatts (MW) of power.

4.4.1.2 REGULATORY SETTING

Federal Regulations

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the U.S. In August 2012, fuel economy standards were increased to 54.5 mpg for cars and light-duty trucks by Model Year 2025.

Federal Energy Policy and Conservation Act and Amendments

The Energy Policy and Conservation Act was enacted in 1975. It established a number of federal programs that play a key role in reducing energy use, most notably the Corporate Average Fuel Economy (CAFE) standards (discussed above) and the Energy Conservation Program for Consumer Products. The Energy Conservation Program for Consumer Products sets energy efficiency standards for certain types of appliances, including air conditioners, refrigerators, water heaters, clothes washers, and dishwashers.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act was enacted in 2007 and contains four key titles to promote energy efficiency and renewable energy generation. Titles 1 and 2 increase the federal CAFE standards, promote renewable energy use in vehicles, and create incentive programs for hybrid vehicles. Title 3 strengthens energy efficiency standards for various appliances and light bulbs, including requiring the phasing out of outdated and inefficient incandescent light bulbs. Title 4 promotes energy efficiency in buildings by establishing several educational and incentive programs.

State Regulations

Executive Order S-3-05—Statewide GHG Emission Targets

This executive order (EO), signed on June 1, 2005, established the following GHG emission reduction targets for the State:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020 reduce GHG emissions to 1990 levels; and
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

This EO also directs the secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets

Executive Order B-30-15—2030 Statewide GHG Emission Goal

This EO, issued by Governor Brown on April 29, 2015, established an interim GHG emission reduction goal for the State: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the pre-existing long-term 2050 goal identified in EO S-3-05 (see discussion above). Additionally, this EO directed CARB to update its Climate Change Scoping Plan (see discussion below) to address the 2030 goal.

California Global Warming Solutions Act

In response to EO S-3-05, the California legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. The heart of AB 32 is its requirement that CARB establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009 indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

Approved in September 2016, SB 32 updates the California Global Warming Solutions Act of 2006 and implements EO B-30-15. Under SB 32, the state would reduce its GHG emissions to 40 percent below 1990 levels by 2030.

Climate Change Scoping Plan

As directed by AB 32, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which identifies the main strategies California will implement to achieve the GHG reductions necessary to reduce forecasted business as usual emissions in 2020 to the state's historic 1990 emissions level (CARB, 2008). In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan; CARB, 2017). The 2017 Scoping Plan identifies the State strategy for achieving the State's 2030 interim reduction target codified by SB 32. Measures under the 2017 Scoping Plan build on existing programs such as the Cap-and-Trade Program, Low Carbon Fuel Standard (LCFS), Advanced Clean Cars (ACC) program, RPS, Sustainable Communities Strategy, and the Short-Lived Climate Pollutant Reduction Strategy.

California Advanced Clean Car Program

The ACC program, adopted January 2012, combines the control of smog, soot-causing pollutants, and GHG emissions into a single coordinated package of requirements for model years 2015 through 2025. Accordingly, the ACC program coordinates the goals of the Pavley, low emission vehicle (LEV), zero emission vehicle (ZEV), and Clean Fuels Outlet programs in order to lay the foundation for the commercialization and support of these ultra-clean vehicles.

AB 1493 (Pavley) directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year. CARB has adopted amendments to its regulations that would enforce AB 1493 but provide vehicle manufacturers with new compliance flexibility.

CARB has also adopted a second phase of the Pavley regulations, originally termed "Pavley II" but now called the "Low Emission Vehicle III" (LEV III) Standards or ACC program, which covers model years 2017 to 2025. CARB estimates that LEV III will reduce vehicle GHG emissions by an additional 4.0 MMT CO₂E for a 2.4 percent reduction over the first phase of Pavley regulations. On August 7, 2012, the final regulation for the adoption of LEV III became effective.

Executive Order S-01-07—Low Carbon Fuel Standard

This EO directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 through a LCFS. The LCFS promotes the use of GHG-reducing transportation fuels (e.g., liquid biofuels, renewable natural gas, electricity, and hydrogen) through a declining carbon intensity standard. The LCFS went into effect on January 1, 2016.

Senate Bill 375—Regional Emissions Targets

The Sustainable Communities and Climate Protection Act, SB 375, was signed in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan measure described above. The purpose of SB 375 is to align regional transportation planning efforts, regional GHG reduction targets, and fair-share housing allocations under state housing law. SB 375 requires Metropolitan Planning Organizations (MPOs)

to adopt a Sustainable Communities Strategy or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO's Regional Transportation Plan. San Diego Association of Governments (SANDAG) is the San Diego region's MPO. In 2010, CARB set targets for the SANDAG region of a 7 percent reduction in GHG emissions per capita from automobiles and light-duty trucks compared to 2005 levels by 2020 and a 13 percent reduction by 2035. These targets are periodically reviewed and updated. CARB's currently proposed targets for the SANDAG region are a reduction of 15 percent by 2020 and 21 percent by 2035.

Renewables Portfolio Standard

The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California's renewable energy mix goal to 50 percent by year 2030.

Assembly Bill 341—Solid Waste Diversion

The Commercial Recycling Requirements mandate that businesses (including public entities) that generate 4 cubic yards or more of commercial solid waste per week and multi-family residences with five units or more arrange for recycling services. Businesses can take one or any combination of the following in order to reuse, recycle, compost, or otherwise divert solid waste from disposal. Additionally, AB 341 mandates that 75 percent of the solid waste generated be reduced, recycled, or composted by 2020.

California Code of Regulations, Title 24 – California Building Code

The California Code of Regulations, Title 24, is referred to as the California Building Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to GHG reductions are the California Building Code's energy efficiency and green building standards as outlined below.

Title 24, Part 6 – Energy Efficiency Standards

Title 24, Part 6 of the California Code of Regulations is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code). This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current version of the Energy Code, known as 2016 Title 24, or the 2016 Energy Code, became effective January 1, 2017. The 2016 Energy Code provides mandatory energy efficiency measures as well as voluntary tiers for increased energy efficiency. The California Energy Commission (CEC), in conjunction with the CPUC, has adopted a goal that all new residential and commercial construction achieve zero net energy by 2020 and 2030, respectively. It is expected that achievement of the zero net energy goal will occur via revisions to the Title 24 standards.

The next version of the Energy Code, known as the 2019 Energy Code, was adopted May 9, 2018 and will take effect on January 1, 2020. The 2019 Energy Code includes provisions for smart residential photovoltaic (PV) systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The new Energy Code aims to reduce energy use in new homes by requiring that all new homes include individual or community solar PV systems or community shared battery storage system that achieves equivalent time-dependent value energy use reduction. Accounting for solar PV requirements, the CEC's preliminary estimates indicate that homes built consistent with the 2019 Energy Code will result in 53 percent less energy use than those built under the 2016 standards.

Title 24, Part 11 – California Green Building Standards Code

Title 24, Part 11 of the California Code of Regulations is the California Green Building Standards Code (CALGreen). Beginning in 2011, CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

The mandatory standards require:

- 20 percent reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- inspections of energy systems to ensure optimal working efficiency;
- low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- dedicated circuitry to facilitate installation of electric vehicle charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- installation of electric vehicle charging stations for at least three percent of the parking spaces for all new multi-family developments with 17 or more units.

California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. To further this policy, the plan identifies a number of strategies, including providing assistance to public agencies and fleet operators.

Local Regulations

San Diego Forward: The Regional Plan

SANDAG is the regional authority that creates region-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's San Diego Forward: The Regional Plan, adopted in 2015, combines two of the region's existing planning documents: the Regional Comprehensive Plan for the San Diego Region and the 2050 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The Regional Comprehensive Plan, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the Regional Plan.

SANDAG 2009 San Diego Regional Energy Strategy

The Regional Energy Strategy (RES) establishes goals for the San Diego region to be more energy efficient, increase use of renewable energy sources, and enhance the region's energy infrastructure in order to meet the growing energy demand. The RES serves as an energy policy guide to support decision-making by SANDAG and its member agencies as the region strives to meet the energy needs of a growing population, housing stock, and number of workers while maintaining and enhancing regional quality of life and economic stability.

SDG&E Long-Term Procurement Plan

As required by the CPUC, utility companies such as SDG&E must prepare Long-Term Procurement Plans (LTPPs) to ensure that adequate energy supplies are available to maintain a reserve margin of 15 percent above the estimated energy demand. These plans outline future energy needs and how those needs can be met. In December 2006, SDG&E filed its LTPP with the CPUC, which included a 10-year energy resource plan that details its expected portfolio of energy resources over the period of 2007 through 2016. The projections included in the current LTPP were based on the CEC's California Energy Demand (CED) 2008-2018 Forecast, dated November 2007. The 2016-2026 CEC CED projections are now lower than what was anticipated in 2007.

City of San Diego General Plan

Policies contained in the Conservation Element of the General Plan are applicable to energy use within the CPU area, as they focus on reducing the City's carbon footprint. Measures to reduce carbon emissions involve reducing vehicular trips through efficient land use and alternative modes of transportation, and maximizing energy efficiency through sustainable building design.

Climate Action Plan

In December 2015, the City adopted the CAP. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a business as usual projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects that GHG emissions will be approximately 15.9 MMT CO₂E in 2020 and 16.7 MMT CO₂E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent by 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO₂E in 2020 and 6.5 MMT CO₂E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below those targets by 1.2 MMT CO₂E by 2020 and 205,462 MTCO₂E by 2035.

In 2016, the City added a GHG emissions significance threshold to the City's CEQA Significance Determination Thresholds and amended the CAP to revise text and incorporate a CAP Consistency Checklist that is required for new development projects subject to CEQA to demonstrate consistency with the City's CAP. Additionally, the Planning Department developed guidance for determining CAP consistency for program-level environmental documents, including the proposed CPU.

4.4.2 Impact Analysis

4.4.2.1 SIGNIFICANCE CRITERIA

GHG Emissions

Based on the City's CEQA Significance Determination Thresholds, a significant GHG emissions impact would occur if implementation of the proposed CPU would do one or more of the following:

- 1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- 2) Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The CAP was originally adopted in December 2015. The City subsequently adopted a new GHG emissions significance threshold and a CAP Consistency Checklist in July 2016. With that subsequent adoption, the CAP PEIR serves as a Qualified GHG Reduction Plan under CEQA Guidelines Section 15183.5 (City of San Diego, 2015b). CEQA Guidelines section 15183.5 permits discretionary projects under CEQA that are consistent with the CAP, to tier off the GHG analysis in the CAP Final EIR, which was certified on December 15, 2015, with an addendum certified on July 12, 2016. Analysis within this PEIR directly tiers off of the CAP PEIR for cumulative GHG emissions under CEQA Guidelines section 15183.5. As such, consistency with the City's CAP is used to evaluate the significance of the proposed CPU's GHG impact.

To determine significance of the impacts associated with implementation of the proposed CPU, an inventory was developed based on the land use designations associated with the adopted Community Plan. Emissions from the proposed CPU were then compared to the GHG emissions inventory for the adopted Community Plan. If emissions under the proposed CPU are less than those that would be generated under the adopted Community Plan, because those emissions were already accounted for in the CAP, impacts related to GHG emissions would be less than significant provided the proposed CPU implements the land use-related strategies identified in the CAP. However, an increase in GHG emissions from the adopted CPU does not necessarily mean that those emissions are not accounted for in the CAP since the CAP is a citywide document. One of the CAP strategies is to implement the General Plan's City of Villages Strategy, which necessarily involves increased GHG emissions in some areas of the City.

The General Plan City of Villages Strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system. Concentrating new growth in an area can result in greater GHG emissions than allowing the less intensive land uses to remain since growth is being directed toward areas that would produce less GHG emissions per capita citywide. Thus, consistency with the City of Villages Strategy can result in one Community Plan area having an increase in GHG emissions, with the result still being an overall decrease in citywide GHG emissions. Therefore, a consistency analysis of the proposed CPU with the CAP is evaluated first through a comparison of the land use and transportation assumption on which the CAP was developed (adopted Community Plan) with the

assumptions in the proposed CPU, and secondly through a qualitative analysis of policies associated with the proposed CPU.

Energy

Section 15126.4(a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy. CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding the potential energy impacts of projects, with a particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency, 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks the inclusion of information in the EIR to the extent relative and applicable to the project.

Consistent with CEQA Guidelines Appendix F, impacts to energy resources could be significant if implementation of the proposed CPU would develop land uses and patterns that would cause the wasteful, inefficient, and unnecessary consumption of energy or the construction of new or retrofitted buildings that would have excessive energy requirements for daily operation. To better analyze the environmental effects associated with the energy use of the proposed project, energy use is evaluated in three distinct categories:

- a) Vehicular and equipment energy use from construction of the proposed project;
- b) Transportation energy use from people traveling to and from the proposed project after buildout; and
- c) Building energy use at the proposed project after buildout.

4.4.2.2 METHODOLOGY AND ASSUMPTIONS

GHG Emissions

Annual GHG emissions were calculated for both the adopted Community Plan and the proposed CPU at buildout using CalEEMod and EMFAC (Air Quality Analysis; Appendix C). Emissions sources include construction (off-road vehicles), mobile (on-road vehicles), area (fireplaces, consumer products [cleansers, aerosols, and solvents], landscape maintenance equipment, and architectural coatings), water and wastewater, and solid waste sources. Where project-specific data was not available at this program level of analysis, model inputs were based on information provided in the CalEEMod User's Guide (CAPCOA, 2017).

GHG emissions are estimated in terms of metric tons of carbon dioxide equivalent (MT CO₂E). CO₂E emissions are the preferred way to assess combined GHG emissions because they give weight to the GWP of different gases. The GWP is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of CO₂. For example, CO₂ has a GWP of 1,

methane (CH₄) has a GWP of 21, and nitrogen oxide (N₂O) has a GWP of 310, which means CH₄ and N₂O have 21 and 310 times greater global warming effect than CO₂, respectively.

a. Construction Emissions

In Section 4.1: Air Quality, the construction emissions estimated to occur were based on samples of typical development projects that could occur within the CPU area. However, construction GHG emissions associated with proposed CPU buildout would include all construction activities through 2050. The reason GHG emissions are evaluated differently from air quality emissions is because GHG emissions impacts are cumulative in nature. There are no localized impacts associated with GHG emissions as impacts are a phenomenon affecting global climate. Air quality emissions, on the other hand, can create localized air quality impacts that warrants project level evaluation based on potential construction scenarios that could occur within the CPU area. Thus, consistent with the methodology used in the San Diego County Updated Greenhouse Gas Inventory 2013, which forecasts that construction emissions would comprise roughly 2.1 percent of total GHG emissions within the County of San Diego, total construction emissions associated with the planning area are estimated at 2.1 percent of the total operational GHG emissions associated with buildout of the CPU.

b. Vehicle Emissions

Vehicle emissions are calculated based on the vehicle type and vehicle miles traveled (VMT) that occur in the base year (2012) and buildout (year 2050) of the adopted land uses and proposed CPU land uses. GHG emissions generated from mobile sources were estimated using emission factors provided by CARB's EMFAC model. EMFAC includes GHG reducing effects from the implementation of Pavley I (Clean Car Standards) and the LCFS, and are thus considered in the calculation of emissions. Based on the Transportation Impact Analysis prepared for the proposed CPU (Appendix D), 1,646,678 VMT are generated in the base year, buildout of the adopted Community Plan would generate 2,299,348 VMT, and buildout of the proposed CPU would generate 2,357,631 VMT.

c. Energy Use Emissions

GHGs are also emitted through activities in buildings for which electricity and natural gas are used as energy sources. GHGs are emitted during the generation of electricity from fossil fuels off-site in power plants. These emissions are considered indirect but are calculated in association with a building's operation. Electric power generation accounts for the second largest sector contributing to both inventoried and projected statewide GHG emissions. Combustion of fossil fuel emits criteria pollutants and GHGs directly into the atmosphere. When this occurs in a building, this is considered a direct emissions source associated with that building. CalEEMod estimates emissions from the direct combustion of natural gas for space and water heating.

CalEEMod estimates GHG emissions from energy use by multiplying average rates of residential and non-residential energy consumption by the quantities of residential units and non-residential square footage entered in the land use module to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider.

Energy consumption values are based on the California Energy Commission-sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey studies, which identify energy use by building type and climate zone. Because these studies are based on older buildings, adjustments have been made in CalEEMod to account for changes to Title 24 Building Codes. CalEEMod 2016.3.2 is based on the California Energy Code (Title 24, Part 6 of the California Code of Regulations). CalEEMod also provides energy consumption rates based on historic data. Energy efficiency is increased with each revision to the Title 24 energy code; thus, depending on when building permits are obtained, new buildings would meet 2016 Title 24 energy code requirements at a minimum. Energy rates in CalEEMod were adjusted to account for a mix of existing development using historic energy values and new development using 2016 Title 24 energy values.

SDG&E’s specific energy intensity factors (i.e., the amount of CO₂, CH₄, and N₂O per kilowatt-hour) are used in the calculations of GHG emissions. The state mandate for renewable energy is 33 percent by 2020 and 50 percent by 2030. However, the energy intensity factors included in CalEEMod by default only represent a 10.2 percent procurement of renewable energy (SDG&E, 2011). The CPUC has indicated that SDG&E has met and exceeded 2020 RPS targets by achieving 43.2 percent in 2015 (CPUC, 2017). Therefore, emission estimates were modeled accounting for reductions achieved by 43.2 percent renewable energy procurement in the existing condition and 50 percent by 2030 and beyond. SDG&E energy intensity factors used in modeling are shown in Table 4.4-5.

Table 4.4-5: San Diego Gas & Electric Intensity Factors

<i>GHG</i>	<i>2009 Factors (lbs/MWh)</i>	<i>Current Factors (lbs/MWh)</i>	<i>2030 to 2050 Factors (lbs/MWh)</i>
Carbon dioxide (CO ₂)	720.49	457.25	401.16
Methane (CH ₄)	0.029	0.018	0.016
Nitrous oxide (N ₂ O)	0.006	0.004	0.003

Notes:

lbs = pound; MWh = megawatt hour

Source: SDG&E, 2011.

d. Area Source Emissions

Area sources include GHG emissions that would occur from the use of landscaping equipment. The use of landscape equipment emits GHGs associated with the equipment’s fuel combustion. The landscaping equipment emission values were derived from the 2011 In-Use Off-Road Equipment Inventory Model (CARB, 2011).

e. Water and Wastewater Emissions

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH₄ and N₂O.

The indoor and outdoor water use consumption data for each land use subtype comes from the Pacific Institute's Waste Not, Want Not: The Potential for Urban Water Conservation in California 2003 (as cited in CAPCOA, 2017). Based on that report, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use (CAPCOA, 2017).

Indirect emissions from water use and wastewater generation are based on the generation rates identified for the CPU area. In addition to water reductions under CalGreen, the GHG emissions from the energy used to transport the water are affected by the RPS. To account for the effects of the RPS, the energy intensity factors included in CalEEMod were reduced by the values shown in Table 4.4-5.

f. Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. The total volume of solid waste was calculated using waste disposal rates identified by California Department of Resources Recycling and Recovery (CalRecycle). The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change (IPCC) method using the degradable organic content of waste. GHG emissions associated with the proposed CPU's waste disposal were calculated using these parameters. Disposal rate assumptions used in CalEEMod are from 2010. According to a CalRecycle report to the Legislature, as of 2013 California has achieved a statewide 50 percent diversion of solid waste from landfills through "reduce/recycle/compost" programs (CalRecycle, 2015). The model accounts for the 50 percent diversion rate documented in 2013 as a conservative assumption. However, AB 341 mandates that 75 percent of the solid waste generated be reduced, recycled, or composted by 2020. Therefore, to account for the continuing actions of recycling requirements under State law (i.e., AB 341), an additional 25 percent solid waste diversion was added into the model to provide for the mandated 75 percent solid waste diversion requirement.

Energy

Energy resources are addressed generally, based on projected buildout of the proposed CPU. Implementation of the proposed CPU has the potential to result in impacts to energy supply due to the development that is anticipated to occur in response to projected population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the proposed CPU would be required to meet the mandatory energy standards of the California Energy Code (Title 24, Part 6 of the California Code of Regulations [CCR]) in effect at the time of issuance of a building permit. Energy resources would be consumed during construction of future development under the proposed CPU. Energy would also be consumed to provide operational lighting, heating, cooling, and transportation for future development. Building-related energy use for the existing condition and buildout of the adopted Community Plan and the proposed CPU was calculated using the California Emissions Estimator Model (CalEEMod; Air Quality Analysis, Appendix C). Transportation-related energy use was analyzed by comparing vehicle miles traveled (VMT) associated with the CPU area.

4.4.2.3 IMPACTS

Impact 4.4-1: Greenhouse Gas Emissions

Would the proposed CPU generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As compared to the existing land uses, the proposed CPU would more than double the number of multi-family residential units in the CPU area. It will also increase the amount of commercial/retail, office, hotel/motel, institutional/community facilities, and recreational uses, while decreasing the amount of industrial, medical office/clinic, and university uses. Overall, the proposed CPU would increase the development potential within the CPU area.

Table 4.4-6 summarizes the estimated emissions for each land use scenario including existing conditions (Existing 2018), buildout of the adopted Community Plan land uses within the CPU area (Adopted 2050), and buildout of the proposed CPU land uses (CPU 2050).

Table 4.4-6: GHG Emissions Comparison for the CPU Area (MT CO₂E per Year)

Emission Source	Existing 2018		Adopted 2050		Proposed CPU 2050		Difference (Proposed - Adopted)	Difference (Proposed - Existing)
	MT CO ₂ E/ yr	% of total emissions	MT CO ₂ E/ yr	% of total emissions	MT CO ₂ E/ yr	% of total emissions	MT CO ₂ E/ yr	MT CO ₂ E/ yr
Vehicles	269,737	69%	242,301	56%	249,864	48%	7,563	-19,873
Energy Use	91,429	23%	129,061	30%	187,113	36%	58,052	95,684
Area Sources	8,158	2%	16,832	4%	28,409	5%	11,577	20,251
Water Use	15,077	4%	21,772	5%	27,111	5%	5,340	12,034
Solid Waste Disposal	9,323	2%	13,797	3%	17,545	3%	3,748	8,222
Construction	--	--	8,899	2%	10,711	2%	1,812	-
Total	393,725	100%	432,662	100%	520,753	100%	88,091	127,028

Note: Totals may vary due to independent rounding.

Source: RECON, 2019.

As shown in Table 4.4-6, GHG emissions would be greater for proposed land uses identified within the CPU area when compared to buildout of the CPU area based on the adopted Community Plan. Emissions from all sources were found to increase from the adopted Community Plan land uses and existing conditions. The increase in GHG emissions is due to the increased density of development that would be allowed within the CPU area. While the proposed CPU would increase development potential, this increase in development intensity would be focused around the existing and future trolley stations. The GHG emissions benefits of this land use pattern are demonstrated by the reduction in the proportion of GHG emissions attributable to vehicle emissions for the proposed CPU land uses compared to the adopted Community Plan land uses. Under the adopted Community Plan land uses, 56 percent of emissions would be attributable to vehicle emissions, while only 48 percent of emissions are attributable to vehicle emissions under the proposed CPU land uses. This is achieved by the proposed CPU's focus on designating high-density mixed-use

development within a 0.5-mile radius of high-quality transit. Future vehicle emissions under both the adopted Community Plan and the proposed CPU would be less than the existing condition due to increased regulations and cleaner technologies that reduce mobile-source emissions.

By targeting new growth along transit corridors, the proposed CPU would be consistent with the General Plan's City of Villages Strategy, and thus, with Action 3.1 of the CAP, which calls for implementation of the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas (TPAs) to increase use of transit. The Mobility Element of the General Plan states that the City of Villages Strategy would support expansion of the transit system by calling for villages to be located in areas that can be served by high-quality transit. Increasing the allowable development intensity and residential densities around the existing and planned trolley stops would lay the groundwork for future transit use as well as provide riders for the existing transit network. By planning Community Villages at these key transit nodes, the proposed CPU would be consistent with the General Plan's Mobility Element Policy ME-B.1, which calls for increased transit service accessibility, and Policy ME-B.9, which calls for transit-supportive land use planning.

The proposed CPU would increase GHG emissions over those of the adopted Community Plan land uses; however, this increase in GHG emissions is a direct result of the implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density along transit corridors and within a TPA would support the City in achieving the citywide GHG emissions reduction targets under the CAP, and thus, impacts associated with GHG emissions would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.4-2: Conflicts with Plans or Policies

Would the proposed CPU conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The regulatory plans and policies discussed in Section 4.4.1.2 aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments. For the energy sector, the reduction strategies aim to reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; and expand research and development.

Consistency with State Plans

Executive Order S-3-05 establishes GHG emission reduction targets for the state, and AB 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. CARB adopted the 2017 Scoping Plan which provided an updated framework for actions to reduce statewide GHG emissions. The 2017 Scoping Plan builds on existing programs and requires CARB and other State agencies to adopt regulations and incentives to reduce GHG emissions. As such, the Scoping Plan is not directly applicable to City planning efforts and projects, although there are several regulatory measures aimed at the identification and reduction of GHG emissions. Most of these regulatory measures focus on area source emissions (e.g., energy usage, high-global warming-potential GHGs in consumer products) and changes to the vehicle fleet (e.g., more fuel-efficient vehicles, reduced VMT, fuel economy). Out of the recommended actions contained in CARB's Scoping Plan, the actions that are most applicable to the proposed CPU would be those that aim to reduce electricity demand by increasing the efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The proposed CPU contains a number of policies, ~~implementation~~ implementing actions, and design guidelines which provide general and site-specific standards for future development to implement to promote green building practices. These include supporting sustainable building practices and Leadership in Energy and Environmental Design (LEED) accreditation, designing buildings to reduce heat gain, and promoting solar access. The Design Guidelines contained in the proposed CPU discuss employing design strategies to allow for passive solar access and energy-efficient installations, clustering buildings to use a common heating/cooling source, using sustainable materials to the maximum extent feasible, integrating energy generation and sustainability, and striving for zero net energy buildings, among other green building practices. Additionally, new construction associated with proposed CPU land uses would be required to include all mandatory green building measures under CALGreen. Therefore, the proposed CPU would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards.

Consistency with Regional Plans

SANDAG's San Diego Forward: The Regional Plan

The proposed CPU would be consistent with the goals of the Regional Plan to develop mixed-use, compact, walkable and bicycle-friendly communities close to transit connections and consistent with smart growth principles. The mobility ~~implementation~~ implementing actions contained in the proposed CPU are closely aligned with the City's General Plan Mobility Element, which seeks to "improve mobility through development of a balanced, multimodal transportation network."

The proposed CPU contains policies,¹ implementing actions, and design guidelines that would promote walkability and bicycling opportunities. ~~Implementation~~ Implementing actions associated with walkability include removing barriers, constructing new pedestrian bridges, establishing

¹ See Policies for Development BLK-2, BLK-4, BLK-5, STS-1, STS-2, BFD-8, WLK-1 through WLK-5, BIC-1 through BIC-4, and STR-1.

paseos between large properties, improving existing and providing new roadway connections, providing streetscape improvements, and implementing intersection improvements such as marked crosswalks and crossing signals.² Implementing actions to promote bicycling include improving the San Diego River Trail connection from Ocean Beach to Navajo Community Plan areas, providing a continuous network of bicycle facilities, constructing new bicycle bridges, improving bicycle connections across I-8, and providing secure bicycle parking at all trolley stations within the community.³

The proposed CPU would also improve the active transportation mode share within the area. Mission Valley is currently served by nine local bus routes and the regional Green Line Trolley with eight trolley stations within the CPU area. A new trolley station is planned at the future Via Las Cumbres extension, and the Regional Plan's planned Purple Line Trolley would provide a new north-south transit connection through the eastern CPU area. Enhancing the pedestrian and bicycle facilities through the implementing actions discussed above would support these planned transit opportunities. Additional implementing actions contained in the proposed CPU would allow coordination with the California Department of Transportation (Caltrans), SANDAG, and the San Diego Metropolitan Transit System to identify and implement transit priority measures, develop mobility hubs, improve interchanges and infrastructure, and continue interagency coordination to optimize transportation services, planning, and implementation efforts.⁴

The proposed CPU policies, implementing actions, and design guidelines would be consistent with the Regional Plan's SCS. Thus, no significant adverse environmental effects would result from the adoption of the proposed CPU in terms of consistency or conflicts with the Regional Plan.

Consistency with Local Plans

City of San Diego General Plan

The General Plan Land Use Element establishes a City of Villages strategy to focus growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. A "village" is defined as the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated. Implementation of this strategy can decrease vehicle miles traveled and reduce GHG emissions. The Mobility Element of the General Plan states:

"Implementation of the City of Villages growth strategy is dependent upon the close coordination of land use and transportation planning. The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system. Villages should increase personal transportation choices and minimize transportation impacts through design that pays attention to the needs of people traveling by transit, foot, and bicycle, as well as the automobile. Focused development and density adjacent

² See Implementing Actions IA-1 through IA-6.

³ See Implementing Actions IA-7 through IA-11.

⁴ See Implementing Actions IA-12 through IA-19.

to transit stops and stations helps make transit convenient for more people, and allows for a more cost-effective expansion of transit services. Housing in mixed-use commercial areas provides opportunities for people to live near their place of work, and helps support the use of neighborhood shops and services. As such, the City of Villages land use pattern is a transportation, as well as a land use, strategy.”

The proposed CPU would support the type of mixed-use development envisioned by the City of Villages strategy.

The ~~implementation~~ implementing actions contained in the proposed CPU are closely aligned with the City’s General Plan. The proposed CPU policies, implementing actions, and design guidelines support General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, improved connections to transit, and sustainable development and green building practices. The proposed CPU also promotes environmentally conscious building practices and materials, increased energy and water efficiency, increased on-site energy generation, and reductions in waste generation. All of these policies correspond with policies set out by the General Plan. Thus, the proposed CPU would be consistent with the City’s General Plan.⁵

City of San Diego Climate Action Plan

The CAP establishes five primary strategies for achieving the citywide CAP goals. Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy consumption. The proposed CPU contains policies and design guidelines to promote green building practices. Green Building Practices policies GBP-1 through -3 address supporting sustainable building practices and LEED accreditation, designing buildings to reduce heat gain, and promoting solar access. Additional design guidelines contained in the proposed CPU discuss employing design strategies to allow for passive solar access and energy-efficient installations, clustering buildings to use a common heating/cooling source, using sustainable materials to the maximum extent feasible, integrating energy generation and sustainability, and striving for zero net energy buildings. Future development would also be required to comply with current Energy Code standards and CALGreen requirements.

CAP Strategy 2 (Clean & Renewable Energy) includes goals for achieving GHG reduction targets through a combination of on-site generation and large-scale renewables. The proposed CPU contains policies and design guidelines to encourage development that incorporates renewable energy, reducing dependence on non-renewable sources, and promoting sustainable building techniques, as discussed above. Additionally, RPS promotes diversification of the state’s electricity supply and decreased reliance on fossil fuel energy sources. SDG&E has already exceeded RPS requirements and has achieved 43 percent renewables.

Strategy 3 (Bicycling, Walking, Transit & Land Use) of the CAP has a number of goals that relate to land use and planning. Action 3.1 in Strategy 3 of the CAP calls for implementation of the

⁵ See Policies for Development BLK-2, BLK-4, BLK-5, STS-1, STS-2, BFD-8, GBP-1 through GBP-3, WLK-1 through WLK-5, BIC-1 through BIC-4, and STR-1; Implementing Actions IA-1 through 19; and Design Guidelines DG-27, DG-28, DG-34, DG-45, and DG-62 through DG-69.

General Plan's Mobility Element and the City of Villages strategy in TPAs to increase the use of transit. As addressed under the discussion of proposed CPU consistency with the Regional Plan and the General Plan, the proposed CPU is consistent with the General Plan's Mobility Element and the City of Villages strategy and is thus consistent with Action 3.1 of the CAP. Further, a vast majority of the CPU area is within a half-mile walking distance to an existing transit stop, and thus, within a TPA. Transit Policies TRN-1 and TRN-2 promote development at densities that would support nearby transit and promote transit use.

Consistent with Actions 3.2 and 3.3 (Commuter Walking and Bicycling), policies have been included promoting walkability and connectivity through the construction of sidewalks and intersections (Blocks and Lots Policies BLK-1 through -5), promoting a pedestrian-scaled streetscape environment (Streetscape Policies STS-1 and -2), promoting internal walkability as well as connectivity with the prioritization of multi-use urban path system improvements (Walkability Policies WLK-1 through -5), and supporting continuous and safe bicycle facilities (Bicycling Policies BIC-1 through -4).

Consistent with Actions 3.4 of Strategy 3, the proposed CPU includes policies to support intelligent transportation systems (~~Policies ITS-1 and ITS-2~~) to improve mobility in the CPU area by including intelligent transportation system improvements such as adaptive signals and by coordinating with the City's Transportation and Storm Water Department and Development Services Department to identify opportunities to incorporate intelligent transportation system technologies to improve transportation efficiency.⁶

Finally, CAP Action 3.6 promotes effective land use to reduce VMT. In addition to the mixed-use, transit-oriented development and policies discussed above, the proposed CPU contains policies related to transportation demand management (Policies TDM-1 through -8) to further promote transit use, walkability, and connectivity to and from other destinations in the community. The proposed CPU would also improve alternative transportation. As discussed, Mission Valley is currently served by nine local bus routes and the regional Green Line Trolley with eight existing and one planned trolley stations within the CPU area, and would be served by the planned Purple Line Trolley. Enhancing the walkability and bicycling facilities through the implementing actions discussed above would promote these transit opportunities, thereby reducing VMT.

The primary goal of CAP Strategy 4 (Zero Waste – Gas & Waste Management) is to divert solid waste and capture landfill CH₄ gas emissions. This strategy is citywide in nature; however, the proposed CPU furthers this strategy by including design guidelines that support the use of recycled materials, including sustainably grown wood products and 'green' materials with post-consumer recycled content in landscaping materials, and providing recycling bins in public spaces and at transit stops.

Strategy 5 (Climate Resiliency) of the CAP calls for further analysis of the resiliency issues that face the various areas of the City. The San Diego River runs through the center of the CPU area to the Pacific Ocean, and is subject to flooding. The proposed CPU contains two policies related to flooding and sea level rise. Policy FRS-1 requires new development and redevelopment to

⁶ See Policies for Development ITS-1 and ITS-2.

incorporate best management practices that address storm water runoff, and Policy FSR-2 promotes the most current federal, state, and local flood proofing standards and siting criteria to prevent San Diego River flow obstruction.

The CAP's Monitoring and Reporting Program Measure 1.4 calls for City staff to annually evaluate City policies, plans (including the CAP), and codes as needed to ensure the CAP reduction targets are met. Through monitoring the effectiveness of CAP actions at reducing GHG emissions, the City would be able to make adjustments to the CAP and other implementing actions, which could include amending land use plans or regulations to reflect more aggressive strategies for GHG reduction. The proposed CPU would be consistent with and would implement the CAP.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.4-3: Energy

Would the proposed CPU develop land uses and patterns that would cause the wasteful, inefficient, and unnecessary consumption of energy or the construction of new or retrofitted buildings that would have excessive energy requirements for daily operation?

Because the proposed CPU is the adoption of a community plan and does not specifically address any particular development project(s), impacts to energy resources are addressed generally, based on projected buildout of the proposed CPU. Implementation of the proposed CPU has the potential to result in impacts to energy supply due to the development that is anticipated to occur in response to projected population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the proposed CPU would be required to meet the mandatory energy standards of the current California Energy Code (Title 24, Part 6 of the CCR).

Energy resources would be consumed during construction of future development under the proposed CPU. Energy also would be consumed to provide operational lighting, heating, cooling, and transportation for future development.

Construction-Related Energy Use

During construction, energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. At the program level, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. Although the exact details of the projects that could be implemented in accordance with the proposed CPU are not known at this time, there are no known conditions in the CPU area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the proposed CPU would not result in the use of wasteful amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

Transportation-Related Energy Use

Buildout of the proposed CPU would be associated with transportation energy use. Trips by individuals traveling to and from the CPU area would largely rely on passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas, and could potentially be fueled by electricity.

At buildout, the proposed CPU would generate 2,357,631 VMT. In the existing condition, the CPU area generates 1,646,678 VMT and buildout of the adopted land uses would generate 2,299,348 VMT (Chen Ryan Associates, 2018). Thus, the proposed land use changes with the proposed CPU would result in increased VMT compared to buildout of the adopted land uses. However, a vast majority of the CPU area is within a half-mile walking distance to an existing transit stop. Mission Valley is currently served by nine local bus routes and the regional Green Line Trolley that has eight existing trolley stations and an additional planned trolley station. Additionally, the CPU area would be served by the planned Purple Line Trolley that would provide a new north-south transit connection through the eastern CPU area generally parallel to I-15. The proposed CPU policies, implementing actions, and design guidelines support General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, and improved connections to transit. The increased development potential within the CPU area is focused around the existing and planned transit stations and is intended to support increased use of these transit stations and reduced overall VMT. Access to the existing and planned trolley stations and bus lines as well as the proximity of homes to services, combined with the mobility and transit improvements, would support a more energy-efficient transportation system and increase opportunities for non-single-occupancy vehicle travel. Long-term buildout of the proposed CPU, therefore, would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of transportation-related energy. Impacts would be less than significant.

Building-Related Energy Use

As future development within the CPU area is implemented, new or renovated buildings would be required to use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand. Residential uses would likely see the most energy use in the evening as people return from work, while most nonresidential facilities would have high energy use during normal business hours and lower levels at other times.

CalEEMod was used to estimate residential and non-residential energy uses, basing consumption on the number of residential units and non-residential square footage expected with buildout of the proposed CPU land uses. Table 4.4-7 shows the anticipated electricity and natural gas use by land use type for the proposed project at buildout compared to the anticipated energy use under buildout of the currently adopted land uses and the existing land use pattern.

Buildout of the proposed CPU would result in an increase of electricity and natural gas usage when compared to both the existing condition and buildout of the adopted Community Plan, as the proposed CPU would allow for increased development intensity within certain areas. Future

development implemented under the proposed CPU, at a minimum, would be required to meet the mandatory energy requirements of CALGreen and the California Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting would be available as incentives for future development.

Table 4.4-7: Existing and Future Electricity and Natural Gas Use in the CPU Area

Land Use	Existing (2018)		Adopted Community Plan (2050)		Proposed CPU (2050)	
	Electricity (kwh)	Natural Gas (kBTU/year)	Electricity (kwh)	Natural Gas (kBTU/year)	Electricity (kwh)	Natural Gas (kBTU/year)
Single-Family Residential	7,249	30,080	7,249	30,080	7,249	30,080
Multi-Family Residential	39,300,000	64,872,500	87,183,000	153,690,000	151,089,000	272,231,000
Commercial/Retail	77,371,700	12,607,600	89,757,900	14,793,900	102,652,000	17,096,700
Office	116,768,000	174,780,000	175,531,000	263,001,000	185,539,000	277,764,000
Motel/Hotel	56,156,300	224,735,000	90,434,200	379,106,000	180,946,000	737,803,000
Industrial	9,494,530	14,211,600	8,331,940	12,471,400	1,899,990	2,843,950
Institutional/Community Facilities	2,500,130	3,742,250	2,718,000	4,071,750	2,990,930	4,479,560
Hospital/Clinic	1,058,090	1,583,770	1,058,090	1,583,770	673,719	1,008,440
University and Other Colleges	2,666,400	10,212,600	2,402,770	9,202,790	2,037,290	7,802,970
Schools K-12	610,870	661,856	610,870	661,856	660,313	717,363
Recreational	1,830,800	2,398,770	1,697,370	2,223,950	5,577,380	7,613,150
Total	307,764,069	509,836,026	459,732,389	840,836,496	634,072,871	1,329,390,213

Source: RECON, 2018.

In addition to the energy efficiencies that would be realized from compliance with current CALGreen and Title 24 standards in new developments, the proposed CPU identifies a number of sustainable design policies that support energy-efficient development. These policies encourage the implementation of sustainable building practices and methods to achieve LEED accreditation, including the use of building designs that achieve heat gain through orienting and configuring buildings to maximize the use of the sun during the summer and winter months for heating and cooling purposes. In addition, these policies aim to prevent new buildings from inhibiting solar access to adjacent buildings and utilizing lighting with adaptive controls to maximize energy efficiency.

There are no features of the proposed CPU that would support the use of excessive amounts of energy or would create unnecessary energy waste. Impacts would be less than significant.

Implementation of the proposed CPU would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the proposed CPU. Thus, short-term construction energy impacts would be less than significant. Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen) and energy conservation policies and design guidelines included in the proposed CPU would support the minimization of energy consumption from operations associated with future development.⁷ Similarly, the focus on multi-modal improvements to encourage non-vehicular transportation options would support reductions in VMT as the proposed CPU is built-out, thus avoiding excessive energy consumption related to transportation. Thus, long-term operational energy impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

⁷ See Policies for Development GBP-1 through GBP-3 and Design Guidelines DG-27, DG-45, DG-63, DG-66, DG-67, DG-69.

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4.5 Hazards and Hazardous Materials

This section analyzes potential impacts from future development under the proposed CPU as it relates to hazards and hazardous materials, including those associated with hazardous emissions, hazardous materials sites, wildland fires, emergency plans, and aircraft hazards. This section provides context regarding hazardous materials, fire hazards, emergency preparedness, and airport hazards in the CPU area, as well as relevant federal, State, and local regulations and programs. For a discussion of geologic and seismic hazards, see Section 4.3: Geology, Soils, and Seismicity. For a discussion of hydrologic and flood hazards, see Section 4.7: Hydrology and Water Quality.

4.5.1 Environmental Setting

4.5.1.1 PHYSICAL SETTING

Hazardous Materials

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Title 22 of the California Code of Regulations (CCR), Division 4.5, Chapter 11, Article 3 groups hazardous materials into four categories based on their properties: toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), and reactive (causes explosions or generates toxic gases). Hazardous materials are commonly used in commercial, agricultural, and industrial applications as well as in residential areas to a limited extent.

See the Hazardous Materials Technical Study for the Mission Valley Community Plan Update (2015) in Appendix H (Hazards Study) for a description of hazardous materials and sites in the CPU area.

Wildfire Hazards

Threat from wildfire hazards is determined based on a number of factors, including fuel loading (vegetation); topography; climatic conditions, such as wind, humidity, and temperature; and the proximity of structures and urban development to fire hazards. Wildland fire hazards are most pronounced in wildland-urban interface areas, or where urban development is located close to open space areas where vegetation can serve as fuel. Generally, the periods of greatest risk for wildland fire are the late summer and early fall when vegetation is at its driest. Human activity, including residential and agricultural burning, campfires, and the use of fireworks can all trigger fires. Natural causes such as lightning strikes may also start fires.

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California. CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The fire threat for the CPU area is shown in Figure 4.5-1. The majority of the CPU area is mapped as having a Moderate threat. This category is typical of large urbanized areas and accounts for fires carried by ornamental vegetation and flammable structures. Areas of High threat are mapped in portions of the CPU area with greater vegetation coverage, including the open spaces along the San Diego River and along the southeastern edge of the CPU area. Areas of Very High fire threat are mapped along the southern edge of the CPU area, corresponding to the vegetated hillsides present there. While these areas are primarily outside of the CPU area boundaries, they are directly adjacent to the CPU area.

Emergency Preparedness

The County of San Diego Office of Emergency Services (OES) coordinates the overall County response to disasters. OES is responsible for notifying appropriate agencies when a disaster occurs, coordinating all responding agencies, ensuring that resources are available and mobilized, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

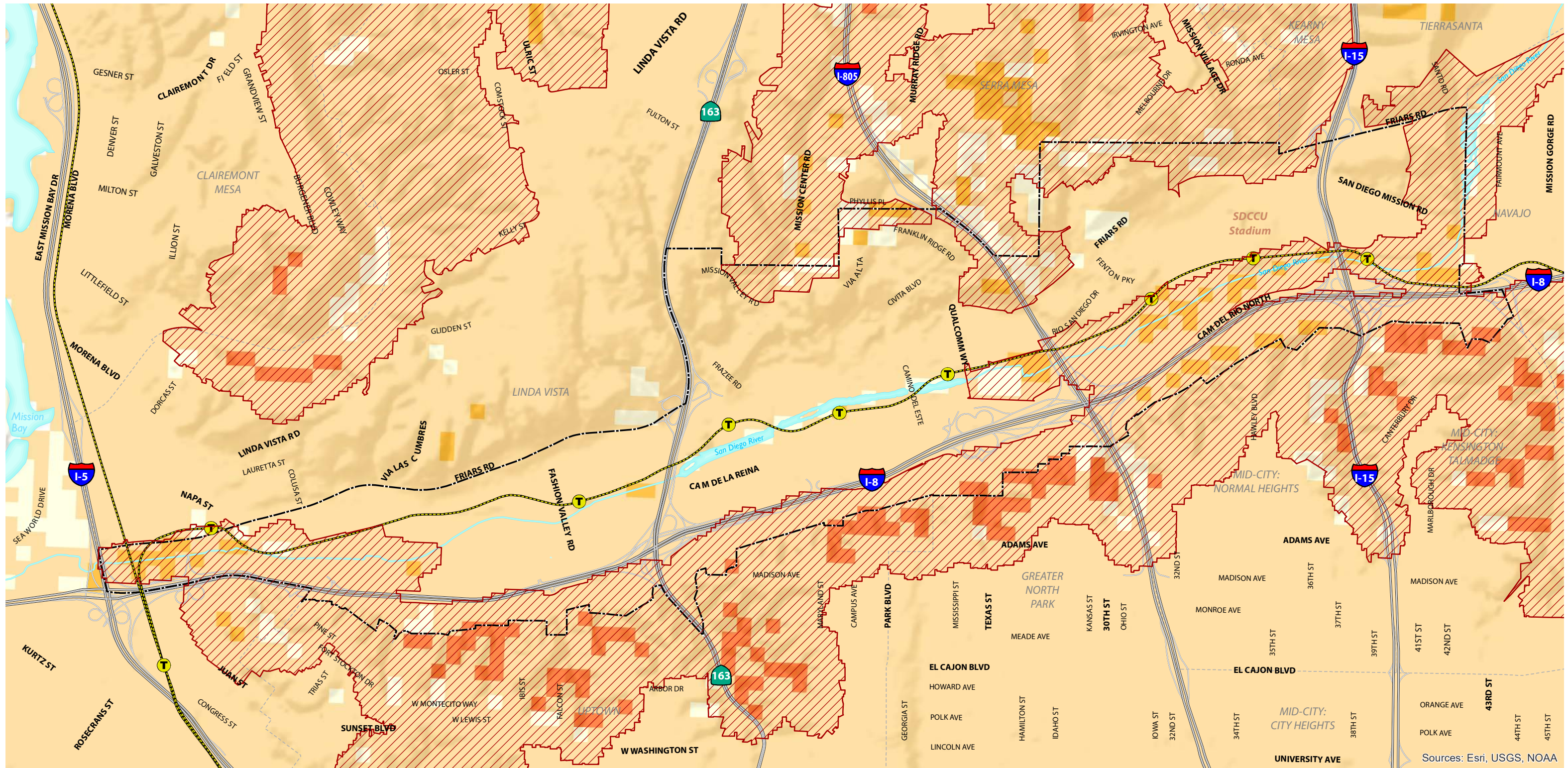
The OES staffs the Operational Area Emergency Operations Center (EOC), a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The UDC, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for the coordination of plans and programs countywide to ensure the protection of life and property.

The City's disaster prevention and response activities are conducted in accordance with the U.S. Department of Homeland Security Office of Domestic Preparedness requirements and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident.

Aircraft Hazards

Risks associated with airport operations include those to people and property located in the vicinity of the airport in the event of an accident, and those to the safety of persons aboard an aircraft. Safety impacts are mitigated through land use policies that specify the types of land uses near airports, thus limiting the number of people exposed to the risk of an accident and protecting airspace from land uses that can create hazards to flight. Airspace protection policies may address the height of objects on the ground and activities that can cause electronic or visual impairment to navigation or attract large numbers of birds (Caltrans, 2011). The CPU area is in the Airport Influence Areas (AIAs) of two airports, the San Diego International Airport (SDIA) and the Montgomery-Gibbs Executive Airport, as shown in Figure 4.5-2.

Figure 4.5-1: Fire Threat



	Trolley Stops	Fire Threat Level (Cal Fire)	Fire Hazard Severity Zones		Lakes/Ponds/Bays
	Light Rail		Very High Threat		Mission Valley Community Plan Boundary
	Freeways		High Threat		Community Planning Areas
	Ramps		Moderate Threat		
	Streams/Creeks		Little or No Threat		
			Very High		
		Local Responsibility Area (LRA)			

Sources: Esri, USGS, NOAA

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Data Source: Fire Threat, Fire and Resource Assessment Program (FRAP), Cal FIRE, 2005; Accessed Online: http://frap.fire.ca.gov/data/frapgisdata-sw-firethreat_download Fire Hazard Severity Zones in LRA (2009) and SRA (2007); SANGIS/SANDAG GIS Data Download, 2017 (www.sangis.org); Dyett & Bhatia, 2018.

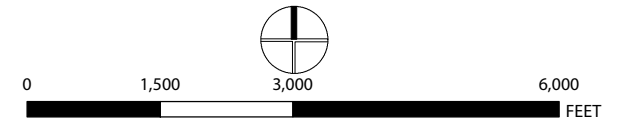
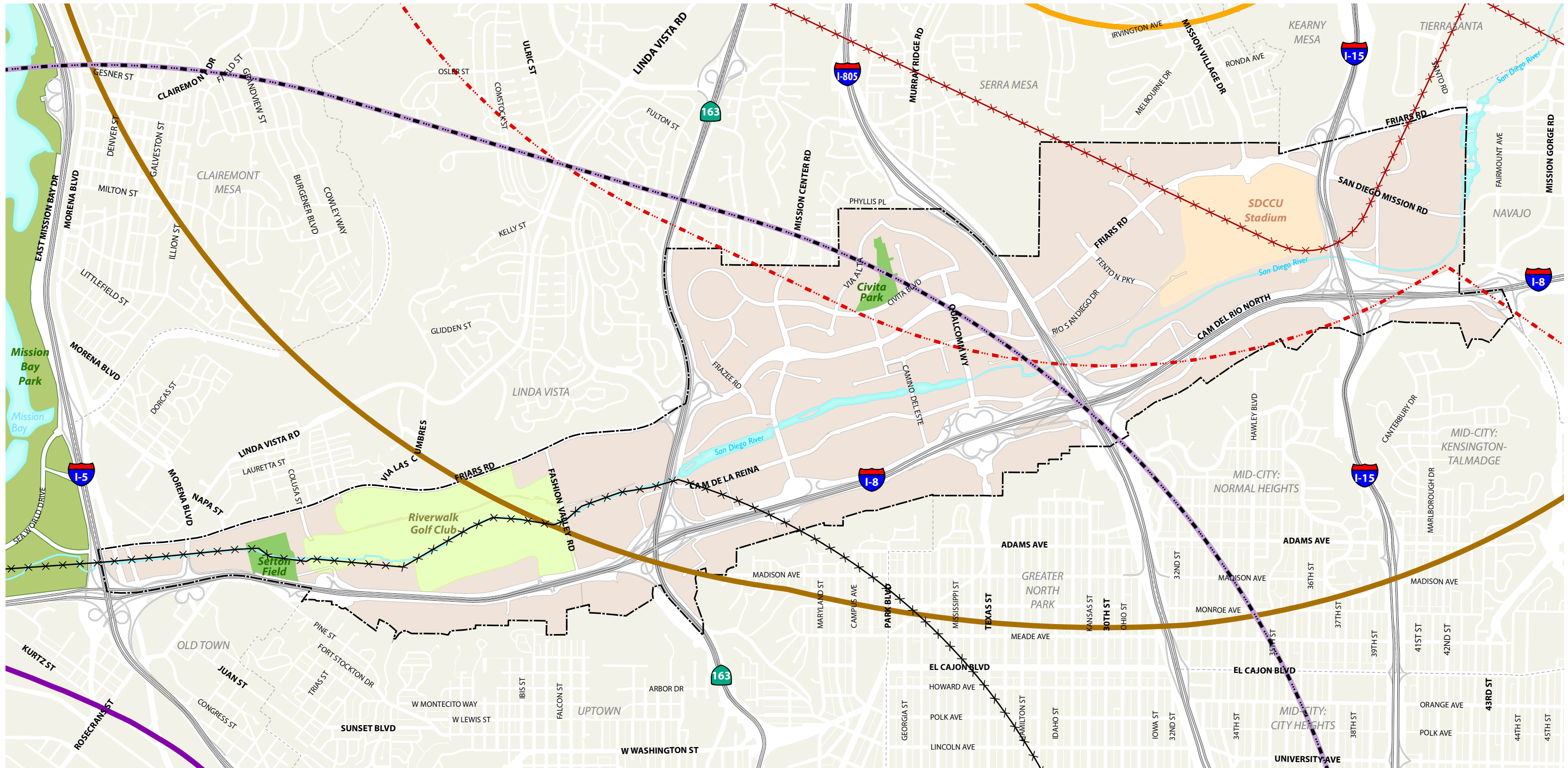
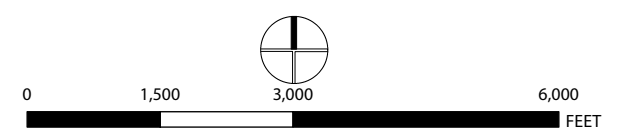


Figure 4.5-2: Airport Compatibility Zones



- | | | | |
|------------------|--|--------------------------|----------------------------------|
| Trolley Stops | Lakes/Ponds | SDIA Overflight Zone | Montgomery Field Overflight Zone |
| Light Rail | Parks | SDIA Airspace | Montgomery Field Airspace |
| Freeways | Mission Valley Community Plan Boundary | SDIA - AIA Review Area 2 | Montgomery Field Review Area 1 |
| Ramps Bottomline | Community Planning Areas | SDIA-AIA Review Area 1 | Montgomery Field Review Area 2 |
| Streams/Creeks | | | |

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San Diego International Airport

SDIA is located approximately 1.2 miles southwest of the CPU area. SDIA is the primary commercial service airport hosting air transportation activity in the San Diego region. The airport has one runway with approaches from the east and west. Aircraft operations averaged 543 per day over a 12-month period ending May 2018. Ninety percent of operations were commercial, and the remainder were air taxi, transient general aviation, and military (Airnav, 2018).

A portion of the CPU area is located within SDIA's AIA Review Area 2 as defined in its Airport Land Use Compatibility Plan (ALUCP), shown in Figure 4.5-2. The ALUCP is further described under Regulatory Setting below.

Montgomery-Gibbs Executive Airport

Montgomery-Gibbs Executive Airport is located approximately 1.5 miles northeast of the CPU area. It is a general aviation airport and is classified by the Federal Aviation Administration (FAA) as a reliever airport for SDIA. A reliever airport is an airport that serves general aviation aircrafts that might otherwise use a congested air carrier airport. The airport has three runways and a helipad. Aircraft operations averaged 567 per day over a 12-month period ending in April 2017. Fifty-one percent of operations were local general aviation, 46 percent were transient general aviation, and the remainder were air taxi, military, or commercial operations (Airnav, 2018).

Most of the CPU area is located within Montgomery-Gibbs Executive Airport's AIA Review Area 2 as defined in the Montgomery Field ALUCP, shown in Figure 4.5-2. The ALUCP is further described under Regulatory Setting below.

4.5.1.2 REGULATORY SETTING

Federal Regulations

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) is the primary federal agency regulating hazardous wastes and materials. USEPA broadly defines a hazardous waste as one that is specifically listed in USEPA regulations, has been tested, and meets one of the four characteristics established by the USEPA (toxicity, ignitability, corrosiveness, and reactivity), or that has been declared hazardous by the generator based on its knowledge of the waste. USEPA defines hazardous materials as any item or chemical that can cause harm to people, plants, or animals when released by spilling, leaking, pumping, pouring, emptying, discharging, injecting, leaching, dumping, or disposing into the environment. Federal regulations pertaining to hazardous wastes and materials are generally contained in Titles 29, 40, and 49 of the Code of Federal Regulations (CFR). The terms hazardous wastes and hazardous materials are used interchangeably in this section.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (42 United States Code sections 6901–6987), including the Hazardous and Solid Waste Amendments of 1984, protects human health and the environment, and imposes regulations on hazardous waste generators, transporters, and operators of treatment, storage, and disposal facilities. The Hazardous and Solid Waste Amendments also

require the USEPA to establish a comprehensive regulatory program for underground storage tanks. The corresponding regulations in 40 CFR 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

Hazardous Materials Transportation Act

The Department of Transportation (DOT), the Federal Highway Administration, and the Federal Railroad Administration are the three entities that regulate the transport of hazardous materials at the federal level. The Hazardous Materials Transportation Act (49 CFR 171, Subchapter C) governs the transportation of hazardous materials. These regulations are promulgated by the DOT and enforced by the USEPA.

Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires that a state mitigation plan, as a condition of disaster assistance, add incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established a new requirement for local mitigation plans.

State Regulations

California Wildland-Urban Interface Code

On September 20, 2005, the California Building Standards Commission approved the Office of the State Fire Marshal’s emergency regulations amending the California Building Code (CBC) (CCR Title 24, Part 2). Section 701A of the CBC includes regulations addressing materials and construction methods for exterior wildfire exposure and applies to new buildings located in State Responsibility Areas or Very High Fire Hazard Severity Zones in Local Response Areas. The CPU area is located in a Local Responsibility Area. As shown in Figure 4.5-1, there are portions of the CPU area identified as Very High Fire Hazard Severity Zones, mainly along Interstate 8 (I-8).

California Fire Code

The 2016 California Fire Code (CCR Title 24, Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas. The City has adopted the California Fire Code as Chapter 5, Article 5 of the City’s Municipal Code (SDMC), including appendices addressing fire-flow requirements for buildings.

Environmental Health Standards for the Management of Hazardous Waste

CCR Title 22, Division 4.5 provides standards applicable to generators and transporters of hazardous wastes, as well as standards for operators of hazardous waste transfer facilities, among other regulations.

Hazardous Materials Release Response Plans and Inventory

Two programs in the California Health and Safety Code (H&SC) Chapter 6.95 are directly applicable to the California Environmental Quality Act (CEQA) issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Prevention (CalARP) program. The County of San Diego Department of Environmental Health (DEH) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulations.

Congress requires EPA Region 9 to make Risk Management Plan information available to the public through USEPA's Envirofacts Data Warehouse. The Envirofacts Data Warehouse is considered the single point of access to select USEPA environmental data.

California H&SC Section 25270, Aboveground Petroleum Storage Act, requires registration and spill prevention programs for aboveground storage tanks (ASTs) that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs implemented by the Regional Water Quality Control Boards (RWQCBs) and the State Water Resources Control Board (SWRCB).

Senate Bill 1889, Accidental Release Prevention Law/Chemical Accident Release Prevention Program

Senate Bill (SB) 1889 required California to implement a federally mandated program governing the accidental airborne release of chemicals listed under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities containing specified hazardous materials that, if involved in an accidental release, could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Response to hazardous material incidents is one part of this plan. The plan is managed by the California Emergency Management Agency, which coordinates the responses of other agencies, including the California Environmental Protection Agency (California EPA), California Highway Patrol, California Department of Fish and Wildlife (CDFW), and RWQCB.

Cortese List

The Cortese List refers to provisions in Government Code Section 65962.5, which requires that the California Department of Toxic Substances Control (DTSC), State Department of Health Services, SWRCB, and designated local enforcement agencies compile and update lists of hazardous materials sites under their purview as specified in the code. The “Cortese List” consists of the information provided by these agencies under the code.

DTSC’s Brownfields and Environmental Restoration Program (Cleanup Program) EnviroStor database provides DTSC’s component of the Cortese List data by identifying State Response, Federal Superfund, and Backlog sites listed under H&SC Section 25356, as well as Certified with Operation and Maintenance sites. The EnviroStor database identifies sites that have known contamination or potentially contaminated sites requiring further investigation, and facilities permitted to treat, store, or dispose of hazardous waste. The EnviroStor database includes lists of the following site types: federal Superfund; State Response, including military facilities and State Superfund; voluntary cleanup; and school sites.

The SWRCB GeoTracker database tracks sites that impact groundwater or have the potential to impact groundwater. It includes sites that require groundwater cleanup such as Leaking Underground Storage Tanks (LUSTs), Department of Defense, and Site Cleanup Program sites, as well as permitted facilities that could impact groundwater such as operating Underground Storage Tanks (USTs), irrigated lands, oil and gas production sites, and land disposal sites.

California Department of Toxic Substances Control

Within the California EPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the State agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law. Since August 1, 1992, DTSC has been authorized to implement the State’s hazardous waste management program for the California EPA.

State Water Resources Control Board

The San Diego RWQCB is authorized by the SWRCB to enforce provisions of the Porter–Cologne Water Quality Control Act of 1969. This act gives the San Diego RWQCB authority to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened and to require remediation of the site, if necessary.

The California Department of Transportation

The California Department of Transportation (Caltrans) manages more than 50,000 miles of California’s highway and freeway lanes, provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Caltrans is also the first responder for hazardous material spills and releases that occur on highway and freeway lanes and inter-city rail services.

State Hazard Mitigation Plan

The State Hazard Mitigation Plan (SHMP) is the State's hazard mitigation guidance document and provides a comprehensive description of California's historical and current hazard analysis, mitigation strategies, goals, and objectives. The SHMP reflects the State's commitment to reduce or eliminate potential risks and impacts of natural and human-caused disasters by making California's families, homes, and communities better prepared and more disaster-resilient. The SHMP is also a federal requirement under the Disaster Mitigation Act of 2000 for the State of California to receive federal funds for disaster assistance grant programs (OES, 2018).

State Aeronautics Act

Through the State Aeronautics Act, every county that contains a public airport must develop and comply with an ALUCP with a 20-year planning horizon. The purpose of an ALUCP is to protect public health, safety, and welfare by providing for the orderly growth and land use development of the area surrounding the airport. ALUCP policies generally set controls on land use and development standards that ensure safe and efficient airport and flight operations and minimize the public's exposure to excessive noise and safety hazards within the airport's vicinity. An ALUCP does not designate land uses, but instead establishes criteria to encourage the development of compatible land uses. It also has no ability to alter existing non-conforming uses; the focus is on future development.

The body responsible for creating and carrying out the ALUCP is each respective county's Airport Land Use Commission (ALUC) or other designated agency. The San Diego County Regional Airport Authority (Airport Authority) serves as the ALUC for San Diego County.

California Underground Storage Tank Regulations

The California Underground Storage Tank Regulations (CCR Title 23, Chapter 16) includes guidelines and standards to protect waters from hazardous substance discharges from USTs. The regulations establish construction requirements for new USTs; establish separate monitoring requirements for new and existing USTs; establish uniform requirements for unauthorized release reporting and for the repair, upgrade, and closure of USTs; and specify variance request procedures. It requires responsible parties to remediate any unauthorized releases from USTs.

Local Regulations

City of San Diego Municipal Code

Hazardous Materials

The Hazardous Waste Establishment section of the San Diego Municipal Code (SDMC) (SDMC Chapter 4, Article 2, Division 8) enables the Health Officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled, and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials section (SDMC Chapter 4, Article 2, Division 9) establishes a system for the provision of information on potential hazards or hazardous

materials in the community, including appropriate education and training for use of information. Elements of the system include the Health Officer's ability to seek advice from the Hazardous Materials Advisory Committee, the filing of a hazardous substance disclosure form, the content of the disclosure form, emergency response information, and penalty for violations.

San Diego Fire Code

The San Diego Fire Code consists of SDMC Chapter 5, Article 5, Sections 55.0101 through 55.9401, which adopt the 2016 California Fire Code with some modifications, and applicable sections of the California Code of Regulations. Provisions of the California Fire Code are described under State Regulations, above.

Explosives

SDMC Chapter 5, Article 3 addresses firearms, dangerous weapons, explosives, and hazardous trades. Included are regulations concerning blasting, firearms, and other hazardous items (pointed missiles, steam boilers, etc.). Specific definitions of various hazardous items and penalties for misuse are listed.

Airport Land Use Compatibility Zone

The SDMC addresses issues related to safety compatibility in the airport land use compatibility overlay zone. Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for Marine Corps Air Station (MCAS) Miramar, Montgomery Field, Brown Field, and Gillespie Airport is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

City of San Diego Building Regulations

The City's Building Regulations (SDMC Chapter 14, Article 5) are intended to regulate the construction of applicable facilities and encompasses (and formally adopts) associated elements of the California Building Code (CBC). Specifically, this includes guidelines regulating the "construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within this jurisdiction, except work located primarily in a public way, public utility towers and poles, mechanical equipment not specifically regulated in the Building Code, and hydraulic flood control structures." The City's Building Regulations also establish acceptable construction materials for development near open space to minimize fire risk through adoption of Chapter 7, "Fire Resistance-Rated Construction," and Chapter 7A, "Materials and Construction Methods for Exterior Wildlife Exposure," of the CBC (SDMC Chapter 14, Article 5, Division 7).

Off-Site Development Impacts

The City's Off-Site Development Impact Regulations (SDMC Chapter 14, Article 2, Division 7) are intended to provide standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. The division applies to all development that produces air contaminants, noise, electrical/radioactivity disturbance, glare, or lighting in any zone. Section 142.0710 establishes that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

Brush Management

The City's Brush Management Regulations (SDMC Section 142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations require the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant maintenance in specific zones, and are implemented at the project level through the grading and building permit process.

Brush management is required in all base zones on publicly or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

1. **Zone One** consists of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone is not allowed on slopes with a gradient greater than 4:1.
2. **Zone Two** consists of the area between Zone One and any area of native or non-irrigated vegetation and consists of thinned native or naturalized vegetation.

County of San Diego Department of Environmental Health

The Hazardous Materials Division (HMD) of the County's DEH regulates hazardous waste and tiered permitting, USTs, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventory, and medical waste. The HMD's goal is "to protect human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed" (County of San Diego, 2016).

California EPA's Unified Program

In 1993, SB 1082 gave the California EPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The purpose of this program is to consolidate and coordinate six different hazardous materials and hazardous waste programs, and to ensure that they are

consistently implemented throughout the state. The California EPA oversees the Unified Program with support from DTSC, the RWQCBs, OES, and the State Fire Marshal.

State law requires the County and local agencies to implement the Unified Program. The agency in charge of implementing the program is called the Certified Unified Program Agency (CUPA). The HMD of the County's DEH is the CUPA for San Diego County.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The 2017 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdictional coordination.

The MJHMP identifies hazardous materials and wildfire/structure fire among the top 11 hazards in the City of San Diego due to the potential loss of life, injuries, and damage to property, as well as the significance in the disruption of services. The MJHMP includes six goals for the City of San Diego.

San Diego County Emergency Operations Plan

The 2018 San Diego County Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, State and federal agencies, and the private sector.

Airport Land Use Compatibility Plans

The Airport Authority serves as the ALUC for San Diego County. The ALUC is responsible for adopting ALUCPs for 16 public-use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the AIA for each airport over a 20-year horizon. The City implements the adopted ALUCPs with the Airport Land Use Compatibility Overlay Zone.

The ALUC does not have jurisdiction over the operation of airports or over existing land uses. Once ALUCPs have been adopted by the ALUC, local agencies with land located within the AIA boundary for any of the airports must amend their planning documents to conform to the applicable ALUCP, unless a local agency makes certain findings in accordance with State law.

The CPU area is located in the AIAs of SDIA and Montgomery-Gibbs Executive Airport, as shown on Figure 4.5-2.

San Diego International Airport ALUCP

The SDIA ALUCP was adopted in 2014 and contains policies and standards related to airspace protection and noise, safety, and overflight compatibility. The SDIA AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60-decibel (dB) Community Noise Equivalent Level (CNEL) noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSS). All policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

Portions of the CPU area that are in the SDIA AIA are all located in Review Area 2, where ALUC review is required for land use plans and regulations proposing increases in height limits and for land use projects that have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements; and/or would create any of the following hazards: glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractants.

The objective of the airspace protection policies and standards is to ensure new development around SDIA does not interfere with safe and efficient air navigation. Policies include requirements limiting construction or objects exceeding 200 feet in height; sources of glare or lighting systems that can distract pilots; sources of dust, vapor, and smoke and thermal plumes; electromagnetic interference; and bird attractants. Overflight compatibility policies require an overflight notification agreement to be recorded for any new dwelling unit within the overflight area.

Montgomery Field ALUCP

The Montgomery Field ALUCP was adopted by the ALUC in 2010. The Montgomery Field AIA is divided into two review areas. Review Area 1 consists of locations where noise and safety concerns may necessitate limitations on the types of land use actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater together with all of the safety zones. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and overflight notification areas. Land uses in Review Area 2 are restricted by Policy 2.6.2 of the ALUCP such that land use actions associated with future projects may be subject to ALUCP review if the proposed project would increase building heights beyond 35 feet, create electrical or visual hazards to aircraft in flight, or increase attraction of birds or other wildlife that could be hazardous to aircraft operation. Additionally, any object which has received a final Notice of Determination from the FAA that the project will constitute a hazard or obstruction to air navigation, to the extent applicable, would be subject to ALUCP review. Restrictions on infill development are not applicable to Review Area 2. The recordation of overflight notification documents is also required in locations within Review Area 2. All portions of the CPU area that are located within the Montgomery Field AIA are all within Review Area 2.

4.5.2 Impact Analysis

4.5.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to hazards and hazardous materials are based on the City's CEQA Significance Determination Thresholds (2016), which have been modified to reflect a programmatic analysis for the proposed CPU. A significant impact related to hazards and hazardous materials could occur if implementation of the proposed CPU would:

- 1) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
- 2) Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;
- 3) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;
- 4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment; or
- 5) Expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents.

4.5.2.2 METHODOLOGY AND ASSUMPTIONS

The Hazards Study prepared for the proposed CPU (see Appendix H) includes an Environmental Data Resources Area search of the CPU area, a search of pertinent federal, State and local regulatory agency database records, a search of regulatory records, and historical land use information from readily available public records. Although the search identified known sites and locations where hazardous materials have been stored, dispensed, conveyed, or spilled, only sites with documented hazardous material releases and oversight by a regulatory agency (local or State agency) are considered to have conditions that could present a risk to human health or the environment. The following section is based on the Hazards Study findings and the associated analysis of potential impacts.

4.5.2.3 IMPACTS

Impact 4.5-1: Wildland Fire Risk

Would the proposed CPU expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

As shown in Figure 4.5-1, there is Moderate fire threat throughout the CPU area, with some risks along the southern edge of the CPU area from adjacent Very High fire threat areas. The CPU area itself is generally urbanized with some vegetated open space areas along the San Diego River that may be classified as High fire threat. Development under the proposed CPU would allow for increased population density in the urbanized parts of the CPU area.

Policy EAI-2 in the proposed CPU would require the management of vegetation within a development. ~~Implementation~~ Implementing Action IA-67-72 would provide for reducing wildfire risks by applying for grants and working with local organizations for clearing and revegetation activities along the San Diego River. Additionally, policies and regulations intended to reduce the risk of wildfires are included in the General Plan, San Diego Fire Code, San Diego Building Regulations, Off-Site Development Impact Regulations, and Brush Management Regulations. Implementation of existing policies and regulations as well as policies within the proposed CPU would serve to reduce the availability of fuels to limit the spread of potential wildfires. Therefore, impacts related to wildfires would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.5-2: Hazardous Emissions and Materials

Would the proposed CPU result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

There are two pre-K to 8th grade private schools (Warren-Walker School and Nazareth School of San Diego) and two special education schools (Cook Education Center and Children's Workshop) within the CPU area. The proposed CPU identifies one potential school location at the Stadium site and the Quarry Falls Specific Plan also includes plans for a school ~~also includes a planned location for one new public school~~ within the Civita development. Proposed land use designations within a quarter-mile radius of existing schools include Commercial/Office/Hotel, Residential (Low Density), Public/Institutional, and Park/Open Space. Proposed land use designations within a quarter-mile radius of the proposed school site include Residential (Medium Density), Residential (High Density), Public/Institutional, Park, and Mixed Use (High Density). While uses allowed under these designations may handle some amount of hazardous materials on a regular basis, they would be unlikely to result in hazardous emissions or exposure to acutely hazardous materials. In addition to schools within the CPU area, there are a number of existing schools located within a quarter-mile of the CPU area and its proposed land uses. Similarly, the proposed CPU would not introduce any land uses, such as industrial, that would be likely to result in hazardous emissions or exposure of schools to hazardous materials.

In accordance with City, State, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such locations until a “no further action” clearance letter from the County DEH, or similar determination is issued by the City’s Fire-Rescue Department (SDFD), DTSC, RWQCB, or other responsible agency.

For any new schools, the individual school district or private entity is responsible for planning, siting, building, and operating the schools. It is the responsibility of the school district or private entity to perform an in-depth analysis of any potential hazards at the project level. The proposed CPU includes policies addressing the need to investigate and properly manage hazardous sites, as well as implementing actions to promote remediation of contaminated sites as well as compliance with State regulations regarding hazardous sites.¹

Through the implementation of existing regulations and implementation of the proposed CPU policies related to hazardous materials and waste sites, impacts to schools from hazardous materials, substances, or waste would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.5-3: Emergency Plan Consistency

Would the proposed CPU impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

The San Diego County Emergency Operations Plan (County of San Diego, 2018) identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation. One interstate identified, I-8, lies within the CPU area, and a second, I-5, abuts the CPU area.

The land use and circulation changes identified in the proposed CPU would not physically interfere with any known adopted emergency plans. Furthermore, as identified in the Mobility Network and Public Facilities, Services, and Safety sections of the Implementation chapter, the proposed CPU includes policies and implementing actions to improve the existing transportation infrastructure, which may improve evacuation and emergency response times.² Thus, impacts related to emergency plan consistency would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

¹ See Policies for Development HZM-1 and HZM-2 and Implementing Actions IA-834 through IA-856.

² See Policies for Development STR-1, STR-2, STR-5, STR-6, EAI-1, EAI-4, and EAI-5; and Implementing Actions IA-20 through IA-27, and IA-734.

Impact 4.5-4: Hazardous Materials Sites

Would the proposed CPU be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

Hazardous materials are typically utilized by land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreational uses, among other activities. According to a search of federal, State, and local regulatory databases conducted for the Hazards Study, over 2,200 sites in or near the proposed CPU area have some documentation of hazardous materials use or storage. Of these, 1,478 sites were considered to have the potential to adversely affect the CPU area based on the type of chemical stored or released, potential pathways of contaminant migration into the CPU area, and data from wells along the CPU area perimeter. The Hazards Study identified a final list of 46 sites that had an unauthorized release of contaminants, were (or had been) under regulatory oversight, and had residual contamination with potential adverse effects in the CPU area. Depending on the degree of adverse effects, each of the 46 sites was assigned a hazard ranking from 5 to 1, with 5 having the highest hazard and 1 having the lowest release (see Hazards Study, Appendix H).

There are no hazardous sites that would result in severe adverse effects (hazard ranking 5) related to the planned use of the CPU area. Of the three sites with Rank 4, two are associated with bulk petroleum releases at the Mission Valley Terminal and the resulting off-site migration and contamination beneath the Stadium site. Remedial measures at these locations have been successful. However, all chemical contamination has not been removed and residual levels remain. These potential adverse effects can be managed for future use in the locations affected by these petroleum releases and would be performed under regulatory oversight. The other site with Rank 4 (former Montgomery Ward site) has a remedial measure in place that would be required to continue to be implemented for future use of this site.

The 10 sites with a Rank of 3 may require additional investigation (possibly a Vapor Intrusion assessment), and remediation, if the current standard of practice indicates significant risks to future receptors. The 26 sites with a Rank of 2 would result in some adverse effects if contaminated media (soil, groundwater) is excavated, extracted, or otherwise disturbed for redevelopment. The seven sites with a Rank of 1 may require no action, other than possible notification to relevant parties.

Federal and State regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with local, State, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a “no further action” clearance letter from the County DEH, or similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency.

The General Plan also includes policies to protect the health, safety, and welfare of residents relating to industrial land uses, documentation of hazardous materials investigations, and requiring soil remediation in land use changes from industrial or heavy commercial to residential or mixed residential development. In addition, the proposed CPU contains policies and implementing

actions that would reduce impacts related to hazardous materials sites. The Policies for Development chapter of the proposed CPU contains a policy for sites with a moderate hazard rank to undergo additional investigation or remediation prior to redevelopment or development of groundwater sources. The Policies for Development chapter contains an additional policy for sites with a low hazard rank to be managed with conditions and proper disposal prior to excavation, extraction, or other disturbance due to redevelopment. Implementing actions within the Implementation chapter of the proposed CPU address funding and compliance with State regulations for contaminated site remediation measures.³

With adherence to existing policies and regulations and implementation of proposed CPU policies, impacts related to hazardous materials sites and health hazards would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.5-5: Aircraft Hazards

Would the proposed CPU expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents?

As discussed above, a portion of the CPU area is located within AIA Review Area 2 for SDIA, and most of the CPU area is located within AIA Review Area 2 for Montgomery-Gibbs Executive Airport. Within these review areas, ALUCP policies regarding airspace protection and overflight notification would apply. Compliance with these policies would serve to ensure that potential hazards related to airport operations would be minimized.

The proposed CPU does not propose any land use actions that would be in conflict with the safety policies of either ALUCP. Implementation of the proposed CPU would not result in any development that would exceed 200 feet in height. Development under the proposed CPU would be subject to SDMC regulations that reduce dust, vapor, smoke, and electromagnetic interference through limits for glare, air contaminants, electrical/radio-activity, and outdoor lighting (Chapter 14, Article 2, Division 7). ~~Proposed CPU Policy BFD-7 addresses the potential for glare in the CPU area.~~ In addition, land use actions and development under the proposed CPU that could pose a hazard to flight operations would be subject to review for compliance by the ALUC.

With adherence to existing policies and regulations, compliance with the provisions of the SDIA and Montgomery Field ALUCPs, and implementation of proposed CPU policies, potential hazards from airport operations would be minimized, and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

³ See Policies for Development HZM-1 and HZM-2 and Implementing Actions IA-834 through IA-856.

4.6 Historical, Cultural, and Tribal Cultural Resources

This section analyzes the potential impacts to historical, archaeological, and tribal cultural resources due to implementation of the proposed CPU. It documents the historical background for the CPU area and addresses prehistoric and historic archaeological resources, the built environment, and tribal cultural resources. The information in this section is based on and references the Cultural Resources Constraints Analysis for the Mission Valley Community Plan Update prepared by Tierra Environmental Services (January 2019) and the Mission Valley Community Plan Update Historic Context Statement prepared by Heritage Architecture and Planning (January 2019), which are included as appendices G and H, respectively, of this PEIR; and the Mission Valley Existing Conditions Map Atlas prepared as part of the CPU process (Dyett & Bhatia, 2016).

4.6.1 Environmental Setting

4.6.1.1 PHYSICAL SETTING

Historical, Archaeological, and Tribal Cultural Resources

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of archaeological sites and built environment resources determined as significant under CEQA.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a Native American tribe and is either on or eligible for listing on the national, State or a local historic register, or which the lead agency, at its discretion, chooses to identify as a Tribal Cultural Resource.

Prehistory and Ethnohistory

The prehistoric cultural sequence for what is now San Diego County is generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay, (also known as the Ipay/Tipay).

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. The coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. The Kumeyaay are the identified Most Likely Descendants for all Native American human remains found in the City.

By the time Spanish colonists began to settle in Alta California in 1769, the areas that are now part of the CPU area and the adjacent community of Old Town were within the territory of the Kumeyaay people, a cultural group comprised of exogamous, nontotemic territorial bands with patrilineal descent. The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. Grass seeds were a staple food resource second only to acorns in the Late Prehistoric native diet, supplemented by other seeds and nuts. Small game such as rabbits, jackrabbits, and rodents were important to the prehistoric diet; deer were somewhat less significant for food, but were an important source of leather, bone, and antlers. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people too. Settlements were moved seasonally to areas where wild foods were in season.

Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which bisects the CPU area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of *Kosaii* (also known as *Cosoy* or *Kosa'aay*) near the mouth of the San Diego River (Gallegos et al. 1998; Kroeber 1925), which took its name from the Kumeyaay word for drying place or dry place (Dumas 2011). This ranchería appears in the earliest of Spanish travelogues for the area, and was the village closest to the Presidio. Although the actual location of the village is unknown, it has been described as being near the mouth of the San Diego River, and also reported by Bancroft in 1884, that a site called *Cosoy/Kosaii/Kosa'aay* by the Native Americans was in the vicinity of Presidio Hill and Old Town. Several investigations have identified possible locations for the village of *Cosoy/Kosaii/Kosa'aay* (Clement and Van Bueren 1993; Felton 1996), but the actual site has

never been found. Several additional large villages have been documented along the San Diego River through ethnographic accounts and archaeological investigations in the area. These include *Nipaquay*, located near present-day Mission San Diego de Alcalá (Kyle 1996); El Corral, located near present-day Mission Gorge; Santee Greens, located in present-day eastern Santee (Berryman 1981); and El Capitan, located approximately 25 miles upstream from the CPU, now covered by the El Capitan Reservoir (Pourade 1961). To the north of the CPU was *onap*, a ranchería of a large settlement located in Rose Canyon; west of the I-5 was a large village known as *hamo, jamo or Rinconada de Jamo*, in present-day Pacific Beach; and further to the north was a prominent rancheria located in present-day Sorrento Valley known as *Ystagua* or *istagua*, a Spanish gloss of *istaawah* or *istawah*, and means worm's (larvae) house.

Native Places and Place Names on the Land

The Kumeyaay have roots that extend thousands of years in the area that is now San Diego County and northern Baja California, and there are hundreds of words that describe a given landform, showing a close connection with nature. There are also stories associated with the land. The San Diego area in general, including Old Town, the River Valley and the City as it existed as late as the 1920s, was known as *qapai* (meaning uncertain). According to Kumeyaay elder Jane Dumas, some native speakers referred to what is now I-8 as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast. The floodplain from the Mission San Diego de Alcalá to the ocean was *hajir* or *qajir* (Harrington; 1925, 1927), and the modern-day Mission Valley area was known as *Emat kuseyaay*, which means spirit land, land with spirits, or place of spirit person, and may have been in reference to the presence of Spanish priests in the valley after 1769 (Robertson 1982). The narrows of Mission Gorge within present-day Mission Trails Regional Park carries the name *Ewiikaakap*, meaning rocks where the river narrows (Robertson 1982).

Although the river valley itself was extensively used and occupied by Native Americans prior to and during the historic periods and well into the 20th century, development prompted by the construction of I-8 has left little evidence of this occupation behind. However, in the culturally rich alluvial nature of the western river valley, the archaeological record has provided evidence demonstrating the importance of this area to the local Kumeyaay community through further research, including testing, data recovery and construction monitoring efforts.

Spanish, Mexican and Early American Periods

Spanish colonization of Alta California began in 1769 (1769-1821). While camp was initially set up near present-day Downtown San Diego, the settlement was soon moved closer to the San Diego River, near the Kumeyaay village of *Kosti/Cosoy/Kosaii/Kosa'aay* below present-day Presidio Park. By 1774, the Mission San Diego de Alcalá was moved up the river valley to its current location in Mission Valley, while the presidio remained on Presidio Hill.

The Spanish period represents a time of European exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the Mission San Diego de Alcalá. The mission system used Native American labor to build the infrastructure needed for European settlement. Traditional lifeways were disrupted, and Native American populations became tied economically to the missions. In addition to providing new construction methods and architectural

styles, the mission system introduced horses, cattle, and other agricultural goods and implements to the area. The cultural systems and institutions established by the Spanish continued to influence the region beyond 1821, when California came under the rule of newly independent Mexico.

The Mexican period (1821-1848) retained many of the Spanish institutions and laws. In 1834 the mission system was secularized, allowing for increased Mexican settlement and the associated dispossession of many local Native Americans. In the 1830s, the Mexican government began to redistribute church lands under the rancho system. The Mexican government granted 29 ranchos in San Diego County to loyal soldiers, politicians, and powerful landowning families (San Diego State University, 2011). The land was used primarily for grazing cattle (Pourade, 1963). Cattle ranching dominated the agricultural activities and the hide and tallow trade flourished in California during the early part of this period.

This redistribution of land also resulted in the creation of a civilian pueblo in San Diego. In 1834, a group of San Diego residents living near present-day Old Town successfully petitioned the governor to formally declare their settlement as a pueblo. San Diego was granted official pueblo status, which came with the right to self-government and exemption from military rule (Crane, 1991). In addition to the creation of a new town government, “A major consequence of San Diego’s being given pueblo status was the eventual acquisition of vast communal lands. In May 1846 Governor Pío Pico confirmed San Diego’s ownership of 48,000 acres including water rights. It was the largest such concession ever given to a Mexican town in California. The grant, a heritage of the Mexican government, was a rich resource that subsidized much of San Diego’s municipal development well into the twentieth century” (San Diego State University, 2011).

The Pueblo Lands of San Diego were divided into 1,350 parcels, ranging in size from 10-acre parcels near Old Town to 160-acre parcels further from town. A large “City Reservation” was set aside for parkland as part of the Pueblo Lands, and still serves the city in that capacity today as Balboa Park (San Diego County Assessor, n.d.). The Mexican period ended when Mexico ceded California to the United States after the Mexican-American War (1846-1848).

Very early in the American period (1848-present), gold was discovered in California. Few Mexican-owned ranchos remained intact because of land claim disputes and the onerous system set up for proving ownership to the U.S. Government. Development of the railroads opened up much of the country. The homestead system encouraged American settlement in the western territories. Throughout the west, the growth and decline of communities occurred in response to an increasing and shifting population, fostering a “boom and bust” cycle. As early as 1868, San Diego was promoted as a natural sanitarium, and many people suffering from tuberculosis came to the area seeking a cure in the moderate climate.

Mission Valley History

The CPU area is home to one historic building, the Mission San Diego de Alcalá located at 10818 San Diego Mission Road, which is listed on the National Register of Historic Places (NRHP), the City of San Diego Register of Historic Resources, and the California Register of Historical Resources (CRHR) as California Historical Landmark No. 242. The designation of one locally listed property, Macy’s (May Company) Mission Valley at 1702 Camino Del Rio North, is currently under appeal and is not yet finalized. These properties are summarized in Table 4.6-1.

The Mission Valley Historical Context Statement (Heritage Architecture & Planning, 2018) in Appendix H of this PEIR discusses the property types—including residential, commercial, industrial, and social/community—associated with the significant themes of different development periods. For each property type, there is a description of character-defining features and significance statement, which discusses the criteria that such properties must meet in order to be eligible for listing in local, State, or national historical registers.

Table 4.6-1: Designated Historical Resources

Site	HRB #	Address	CPU Area
<i>National Register of Historic Places</i>			
Mission San Diego de Alcalá	113	10818 San Diego Mission Road	Mission Valley
<i>California Register of Historic Places</i>			
Mission San Diego de Alcalá CHL No. 242	113	10818 San Diego Mission Road	Mission Valley
<i>San Diego Register of Historic Resources</i>			
Mission San Diego de Alcalá	113	10818 San Diego Mission Road	Mission Valley
Macy’s	1203	1702 Camino Del Rio North	Mission Valley

Note:

HRB = Historic Resources Board

Sources: National Register of Historic Places, 2018; California Register of Historical Resources, 2019; San Diego Register of Historic Resources, 2018.

4.6.1.2 REGULATORY SETTING

Federal Regulations

National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in the Code of Federal Regulations (CFR) (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15065.5) as well.

National Environmental Policy Act

The National Environmental Policy Act (NEPA) was signed into law on January 1, 1970. NEPA created an environmental review process requiring federal agencies to consider the effects of their actions on the environment. Under NEPA, all federal agencies must carry out their regulations, policies, and programs in accordance with NEPA's policies for environmental protection, including project compliance with Section 106 of the National Historic Preservation Act, as previously discussed. Any future federal projects in the CPU area undertaken in accordance with the CPU would be subject to NEPA requirements.

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archeological and historic preservation activities and methods. Federal agency personnel responsible for cultural resource management pursuant to section 110 of the National Historic Preservation Act, State Historic Preservation Offices responsible under the National Historic Preservation Act, local governments wishing to establish a comprehensive approach, and other individuals and organizations needing basic technical standards and guidelines for historic preservation activities are encouraged to use these standards.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 to provide for the protection of Native American graves. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

State Regulations

California Register of Historical Resources

The California Office of Historic Preservation maintains the California Register of Historical Resources (CRHR). The CRHR is the authoritative guide to the state's significant historic and archeological resources. The program provides for the identification, evaluation, registration and protection of California's historical resources. The CRHR encourages public recognition and protection of resources of architectural, historic, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protection to these resources under CEQA.

The CRHR has also established context types to be used when evaluating the eligibility of a property or resource for listing. The four criteria are as follows:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values.
4. It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.

Similar to the NRHP, eligibility for the CRHR requires an establishment of physical integrity, including the four criteria previously described. California's list of special considerations is less stringent than the NRHP, providing allowances for relocated buildings, structures, or objectives as

reduced requirements for physical integrity. CEQA sections 15064.5 and 21083.2(g) define the criteria for determining the significance of historical resources. The term “historical resources” refers to all prehistoric and historic resources, including archaeological sites, traditional cultural properties, and historic buildings, structures, sites, objects, landscapes, etc. Since resources that are not listed or determined eligible for the State or local registers may still be historically significant, their significance shall be determined if they are affected by a project. The significance of a historical resource under Criterion 4 rests on its ability to address important research questions. Most archaeological sites which qualify for the CRHR do so under Criterion 4 (i.e., research potential).

California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one that qualifies for the CRHR or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5025.1(g) of the Public Resources Code (PRC). A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in a historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource, based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- Having a special and particular quality such as being the oldest or best available example of its type; and/or
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

California Public Resources Code

Sections 5097–5097.6 of the PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on State lands. The State agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the California Native American Heritage Commission (NAHC) whenever Native American graves are found. Violations for the taking or possessing of remains or artifacts are felonies.

PRC Section 5097.9-991, regarding Native American heritage, outlines protections for Native American religion from public agencies and private parties using or occupying public property.

Also protected by this code are Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property.

California Health and Safety Code

Section 7052 of the California Health and Safety Code (H&SC) makes the willful mutilation, disinterment, or removal of human remains a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

H&SC Section 8010-8030 constitutes the California Native American Graves Protection and Repatriation Act of 2001 (CALNAGPRA). CALNAGPRA, like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations. The code provides a process and requirements for the identification and repatriation of collections of human remains or cultural items to the appropriate tribes from any State agency or museum that receives State funding.

California Government Code Section 65040.2(g)

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts to places, features, and objects described in sections 5097.9 and 5097.993 of the Public Resources Code; (2) procedures for identifying through the NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

Native American Burials (PRC Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. The Native American Historic Resource Protection Act (PRC sections 5097.993 - 5097.994) makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. In 2006, Assembly Bill (AB) 2641 (Coto) amended the PRC to provide for the protection of human remains when discovered, as well as conferral with descendants to make recommendations or preferences for treatment of human remains. A landowner, upon discovery of human remains, is required to ensure that the immediate vicinity, as described, is not damaged or disturbed, until specific conditions are met, including discussing and conferring, as defined, with the descendants regarding their preferences for treatment. The amended PRC, along with the California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011] ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the

archaeological evaluation process in accordance with CEQA and any applicable local regulations, and that any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, Senate Bill (SB) 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term “California Native American tribe” is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC.” The bill also requires that, prior to the adoption or amendment of a city or county’s general plan, the city or county consult with California Native American tribes for the purpose of preserving specified places, features, and objects located within the city or county’s jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

Assembly Bill 52

AB 52, which created the new category of “tribal cultural resources” that must be considered under CEQA, applies to all projects that file a notice of preparation (NOP) or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

Local Regulations

City of San Diego Municipal Code Historical Resources Regulations

The City’s Historical Resources Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 2) were adopted in January 2000, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, State, and federal policies and mandates. Included in these are the General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City’s regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old and they may have been altered or still be in use.

Compliance with the Regulations begins with the determination of the need for a site-specific survey for a project. Pursuant to SDMC Section 143.0212(a), a historic property (built environment) survey can be required for any parcel containing a structure that is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. SDMC Section 143.0212(b) requires that historical resource sensitivity maps be used to identify properties in the city that have a probability of containing historic or pre-historic archaeological sites. These maps are based on records of the California Historical Resources Information System (CHRIS) maintained by the South Coastal Information Center (SCIC) at San Diego State University, archival research from the San Diego Museum of Man, and site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City would require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. In both cases, the determination for the need to conduct a site-specific survey must be made in 10 days for a construction permit (ministerial) or 30 days for a development permit (discretionary) pursuant to SDMC Section 143.0212(c).

SDMC Section 143.0212(d) states that if a property-specific survey is required, it shall be conducted according to the criteria included in the City's Historical Resources Guidelines. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

Historical Resources Guidelines

Historical Resources Guidelines are incorporated in the San Diego Land Development Manual by reference. The Guidelines establish a development review process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

City of San Diego Historical Resources Register

As compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board [(HRB)] if it meets any of the following criteria:

- Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- Is identified with persons or events significant in local, State, or national history;
- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

- Is listed or has been determined eligible by the National Park Service for listing in the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing in the State Register of Historical Resources; or
- Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.”

City of San Diego General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the HRB, the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans, such as the proposed CPU being analyzed within this PEIR. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Policy HP-A.5.e states that Native American monitors should be included during all phases of the investigation of archaeological resources; this would include surveys, testing, evaluations, data recovery phases, and construction monitoring. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism.

4.6.2 Impact Analysis

4.6.2.1 SIGNIFICANCE CRITERIA

Historical resources significance determinations, pursuant to the City of San Diego's CEQA Significance Determination Thresholds (2016), consist first of determining the sensitivity or significance of identified historical resources and, second, determining direct and indirect impacts that would result from project implementation. Based on the City's CEQA Significance Determination Thresholds, which have been utilized to guide a programmatic assessment of the proposed CPU, impacts related to historical resources would be significant if the proposed CPU would result in any of the following:

- 1) An alteration, including the adverse physical or aesthetic effects and/or the destruction of an historic building (including an architecturally significant building), structure, object or site;
- 2) A substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries; or
- 3) A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The City of San Diego's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under PRC Section 5024.1(g), although even a resource that is not listed in or determined eligible for listing in the CRHR, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process.

As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50-square-meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.
- The determination of significance for historic buildings, structures, objects, and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.
- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

4.6.2.2 METHODOLOGY AND ASSUMPTIONS

The Cultural Resources Constraints Analysis (Appendix G) and the Mission Valley Historic Context Statement (Appendix H) were prepared for the proposed CPU. The Cultural Resources Constraints Analysis describes the prehistory, ethnohistory and importance of the CPU area to the local Kumeyaay community; identifies significant archaeological and tribal cultural resources (prehistoric and historic periods); provides guidance on the identification of possible new significant archaeological and tribal cultural resources; and includes recommendations for treatment of significant resources. The Mission Valley Historic Context Statement (addressing the built environment) provides information regarding the significant historical themes in the development of the CPU area, the property types that convey those themes in an important way, and the location of potential historical resources within the community, including individual resources, and districts.

Prehistoric and Historic Archaeological Resources and Tribal Cultural Resources

Cultural sensitivity levels for the CPU area are rated low, moderate, or high based on the results of an archival records search conducted at the SCIC, a records update at the San Diego Museum of Man, a Sacred Lands File check by the NAHC, and regional environmental factors as further described in the Cultural Resources Constraints Analysis for the Mission Valley Community Plan Update prepared by Tierra Environmental Services (January 2019) with additional information provided by qualified City staff (Appendix G).

A low sensitivity rating indicates few or no previously recorded resources within the area. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate.

Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

Historical Resources

The historical resources analysis is based on information presented in the Mission Valley Historic Context Statement prepared for the Mission Valley Community Plan Update (Appendix H). Research for the Historic Context Statement included a review of previous studies and archival research. Documents reviewed include the NRHP, the San Diego Register of Historical Resources, and previously prepared historic resource surveys and context statements. Archival research included primary and secondary sources such as Sanborn Fire Insurance Maps, newspaper articles, city directories, census data, historic photographs, books and publications, Geographic Information System (GIS) maps, and internet sources. Research took place at local, regional, and online repositories including the San Diego Central Library (California Room), San Diego Historical Society Research Library, San Diego County Assessor's Office, and the City of San Diego Planning Department.

The Mission Valley Historic Context Statement follows guidelines from the following National Park Service publications:

- National Register Bulletin No. 15 How to Apply the National Register Criteria for Evaluation
- National Register Bulletin No. 16A How to Complete the National Register Registration Form
- National Register Bulletin No. 16B How to Complete the National Register Multiple Property Documentation Form
- National Register Bulletin No. 24 Guidelines for Local Surveys: A Basis for Preservation Planning.

Guidelines published by the California Office of Historic Preservation were also consulted, including the State's official Instructions for Recording Historical Resources and a guide entitled "Writing Historic Context Statements." The City of San Diego's Historic Resource Survey Guidelines (July 2008) were also consulted.

4.6.2.3 IMPACTS

Impact 4.6-1: Historic Structures, Objects, or Sites

Would the proposed CPU result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of an historic building (including an architecturally significant building), structure, object or site?

The CPU area contains two known historic resources. The Mission San Diego de Alcalá is listed in the NRHP and the San Diego Historical Resources Register. The Macy's Building (May Company/William Lewis, Jr. Building) may be listed in the San Diego Historical Resources Register, but that designation is currently on appeal. Properties of architectural or thematic interest were noted and include single and multiple family residences, a former bowling alley, four motels, a stadium, and six office buildings. These properties fall under the following themes and sub-themes:

- Establishment of the Mission
- Development of Natural Resources
- Sub-theme: Sports, Recreation, and Leisure
- Sub-theme: Motels/Hotels
- Sub-theme: Commercial Regional Shopping Centers and Office Development
- Sub-theme: Residential – Apartment Buildings

While the SDMC provides for the regulation and protection of designated and potential historical resources, it is not possible to ensure the successful preservation of all historic built environment resources within the proposed CPU area at a programmatic level. Although the CPU does not propose specific development, future development and related construction activities facilitated by the proposed CPU at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts of specific projects may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, sites and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance. Thus, potential impacts to individual historic resources could occur where implementation of the CPU would result in increased development potential. Mitigation Measure MM-CULT-1 is provided below to address potential significant impacts. However, even with implementation of the mitigation framework, as the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the impact would be considered significant and unavoidable.

Mitigation Measures

The City of San Diego's General Plan, combined with federal, State, and local regulations, provide a regulatory framework for project-level historical resources evaluation/analysis criteria and, when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources, such as designated historical resources, historical buildings, districts, landscapes, objects, and structures, are subject to site-specific review in accordance with

the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. Mitigation Measure MM-CULT-1 would be required of all development projects with the potential to impact significant historical resources.

MM-CULT-1 Historic Buildings, Structures, and Objects

Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. The evaluation of historic architectural resources shall be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity as indicated in the Historical Resources Guidelines and Historic Resources Regulations (SDMC sections 143.0201–143.0280).

The preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- Preparing a historic resource management plan;
- Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource;
- Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources, to identify potential impacts from a proposed development and evaluate the significance of any identified historical resources. If potentially significant impacts to an identified historical resource are identified, these reports shall also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

Development implemented in accordance with the Proposed CPU that would potentially result in impacts to significant historical resources would be required to incorporate mitigation measure MM-CULT-1, to be adopted in conjunction with the certification of this PEIR and consistent with existing requirements of the Historic Resources Regulations and Historic Resources Guidelines.

The mitigation framework combined with the proposed CPU policies promoting the identification and preservation of historical resources would reduce the program-level impact related to historical resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to historical resources, including historic structures, objects, or sites, would be significant and unavoidable.

Impact 4.6-2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Would the proposed CPU result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?

According to the Cultural Resources Constraints Analysis, 57 archaeological and cultural resources have been previously recorded within the CPU area. These include 16 historic archaeological sites; 21 prehistoric sites; 2 multi-component sites with both prehistoric and historic period artifacts; 10 isolated prehistoric and historic artifacts; one modern site, and one site of unknown origin. In addition, several key areas have been identified that may be of high interest to local Native American communities because of proximity to the CPU, such as, but not limited to, the prehistoric Rancheria of *Kosti/Cosoy/Kosaii/Kosa'aay*, the Presidio de San Diego, the ethnohistoric route through the valley known today as the Kumeyaay Highway, and the Mission San Diego de Alcalá which is within the CPU boundary. Several of these are listed on the City's Historical Resources Register or identified as "Landmarks" on the California Register of Historic Resources and the National Register of Historic Places, or have not been formally recognized to date. Despite ethnohistoric and historic information about the prehistoric Rancheria of *Kosti/Cosoy/Kosaii/Kosa'aay* and presence of the Kumeyaay in the San Diego River Valley and surrounding area, the Sacred Lands File check from the Native American Heritage Commission (NAHC) indicated that no sacred lands have been identified within the vicinity of the community of Mission Valley.

As discussed in the Constraints Analysis, while much of the community of Mission Valley has been developed, it consists of a heavily active, depositional river valley utilized over thousands of years and the potential for intact cultural deposits at depth is probable at many locations. As is illustrated by the high density of documented cultural resources (Tables 2 and 3 in Section II of the Constraints Analysis), the area represents a prehistorically and historically active environment. Beginning with early Spanish establishment of the Presidio, the areas between present-day Old Town and the Mission San Diego de Alcalá played a pivotal role in the historic development of the San Diego region. Prior to the arrival of the Spanish, the area was extensively occupied and exploited by Native Americans, further contributing to the community's rich cultural heritage and sensitivity for archaeological resources. Considering these factors in conjunction with Native American correspondence, much of the CPU area is of either moderate or high cultural sensitivity. However, due to continued use and development in the CPU area, it is likely that numerous prehistoric and historical resources in the community of Mission Valley have been disturbed over the years, and any remaining undisturbed soils up to several feet deep anywhere along the San Diego River Valley

have the potential to contain sensitive cultural resources. As such, the archaeological sensitivity level for the community of Mission Valley is high.

Participation of the local Native American community is crucial to the effective identification and protection of cultural resources within the community of Mission Valley in accordance with the City's Historical Resources Guidelines (City of San Diego, 2001). Native American participation is required for all levels of future investigations in the community of Mission Valley including those areas that have been previously developed, unless additional information can be provided to demonstrate that the property has been graded to a point where no resources could be impacted. Areas that have not been previously developed should be surveyed to determine potential for historical resources to be encountered, and whether additional evaluation is required. In areas that have been previously developed, additional ground-disturbing activities may require further evaluation and/or monitoring.

Future development and related construction activities could result in the alteration or destruction of prehistoric or historic archaeological resources, objects, or sites, and could impact religious or sacred use or disturb human remains, particularly considering the cultural significance of the CPU area. Direct impacts may include substantial alteration or demolition of archaeological sites from grading, excavation, or other ground-disturbing activities. Indirect impacts may include the potential for vandalism or destruction of an archaeological resource or traditional cultural property.

Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the proposed CPU area, the potential exists for these to be encountered during future construction activities, particularly given the high cultural sensitivity of canyon areas leading into the Mission Valley area, which has been previously identified as an area of concern to the local Native American community, and in proximity to the Presidio and areas bordering Old Town. Several historic period cemeteries containing Native American and Old Town descendent burials have been documented in the adjacent community of Old Town, which were utilized prior to and after the Mission San Diego de Alcalá moved to its current location in Mission Valley. The burial ground associated with the Mission San Diego de Alcalá is the only one documented in the Mission Valley CPU area and is considered sacred to the local Native American community.

Because Native American human remains have been encountered within the CPU area, the potential for encountering human remains outside of the documented cemetery within the CPU area is high, during both archaeological investigations and grading activities. Therefore, tribal consultation in accordance with AB 52 and the Public Resources Code, as well as consultation with the Old Town descendent community has been incorporated into Mitigation Measure MM-Cult-2 for subsequent projects to ensure that tribal cultural resources and descendent community concerns are addressed early in the development review process.

The City has developed Historical Resource Sensitivity Maps that provide general locations of where historical resources are known to occur or have the potential to occur. These maps were developed in coordination with technical experts and tribal representatives. Upon submittal of permit applications, a parcel is reviewed against the Historical Resource Sensitivity Maps

specifically to determine whether the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register (SDMC Section 143.0212). This review is supplemented with a project specific records search of the NAHC Sacred Lands File by qualified staff, and, as stated above, a site-specific archaeological survey would be required.

The proposed CPU is designed to support the historic preservation goals of the City's General Plan, and contains policies for protection and preservation of significant archaeological resources in the proposed Historic Preservation Element. Policy APH-2 to conduct Native American consultation early in the development review process is also included in the proposed CPU to identify prehistoric and historic archaeological cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, State, and federal regulations and guidelines.

Human remains, particularly those interred outside of formal cemeteries, could be disturbed during grading, excavation, or other ground-disturbing activities associated implementation of the Proposed CPU. The treatment of Native American human remains is regulated by PRC Section 5097.98, as amended by AB 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. In addition, H&SC Section 7050.5 includes specific provisions for the protection of human remains in the event of discovery, and Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The H&SC is applicable to any project where ground disturbance would occur.

While existing federal, State, and local regulations, and proposed CPU policies would provide for the regulation and protection of prehistoric and historic archaeological resources and human remains and avoid potential impacts, it is not possible to ensure the successful preservation of all prehistoric and historic archaeological resources. Therefore, implementation of the proposed CPU could adversely impact prehistoric or historic archaeological resources including religious or sacred use sites and human remains. Mitigation Measure MM-CULT-2 is provided to address potential impacts. However, impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

Mitigation Measures

The City of San Diego's General Plan, combined with federal, State, and local regulations, provides a regulatory framework for project-level cultural resources evaluation/analysis criteria and, when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect archaeological and/or tribal cultural resources are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. Mitigation Measure MM-CULT-2 would be required of all development projects with the potential to impact significant archaeological and tribal cultural resources.

MM-CULT-2 Archaeological and Tribal Cultural Resources

Prior to issuance of any permit for a future development project implemented in accordance with the CPU that could directly affect an archaeological or tribal cultural resource; the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst shall determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory System and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A cultural resources sensitivity map was created from the record search data as a management tool to aid in the review of future projects within the CPU area which depicts three levels of sensitivity (Figure 4.6-1). Review of this map shall be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. These levels, which are described below, are not part of any federal or State law.

- **High Sensitivity:** These areas contain known significant cultural resources and have a potential to yield information to address a number of research questions. These areas may have buried deposits, good stratigraphic integrity, and preserved surface and subsurface features. If a project were to impact these areas, a survey and testing program is required to further define resource boundaries subsurface ~~presence~~ presence or absence and determine level of significance. Mitigation measures such as a Research Design and Archaeological Data Recovery Plan (ADRP) and construction monitoring shall also be required.
- **Medium Sensitivity:** These areas contain recorded cultural resources consisting of more site structure, diversity of feature types, and diversity of artifact types, or have a potential for resources to be encountered. The significance of ~~the~~ cultural resources within these areas ~~is not~~ may be unknown. If a project impacts these areas, a site-specific records search, survey and significance evaluation is required if cultural resources were identified during the survey. Mitigation measures may also be required.
- **Low Sensitivity:** These areas are described as having a high level of disturbance due to existing development, with few or no previously recorded resources documented within the area or considered during tribal consultation.

Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. If a project impacts these areas, a records search may be required. These areas have slopes greater than 25 degrees. Steep slopes have a low potential for archaeological deposits because they were not occupied by prehistoric peoples but rather used for gathering and other resource procurement activities. Many of these activities Areas with steep hillsides generally do not leave an archaeological signature and would not require further evaluation. If a project impacts these areas, a survey is needed to confirm the lack of cultural resources. Should cultural resources be identified, a significance evaluation is required followed by mitigation measures.

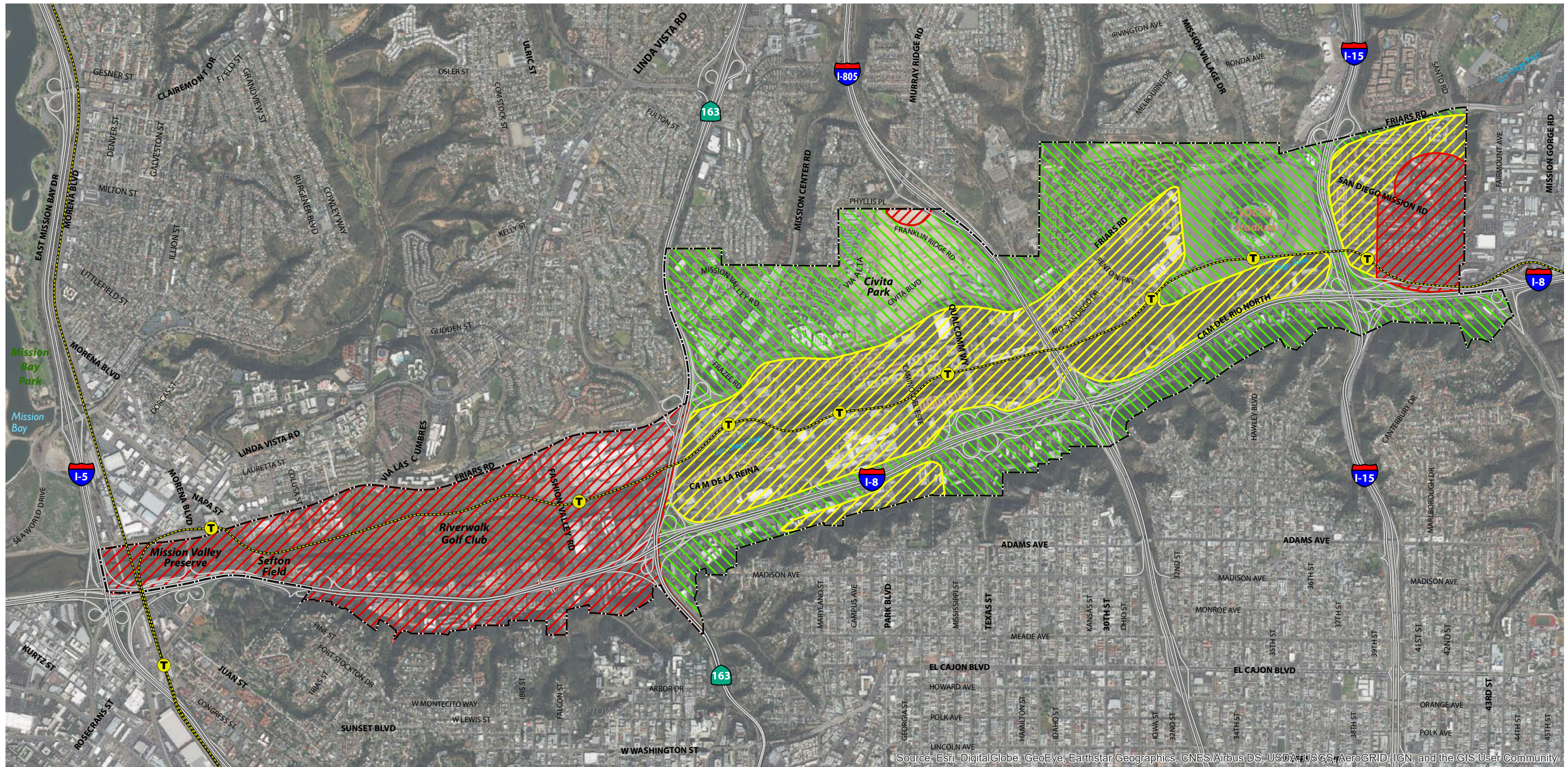
~~Review of this map shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the City's Historical Resources Guidelines. If there is any evidence that the project area contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City's Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program shall meet professional qualifications in accordance with the City's Historical Resources Guidelines.~~

Step 1










Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources, preparation of an evaluation report is required. The evaluation report shall generally include background research, field survey, archaeological testing, and analysis. Before actual field reconnaissance would occur, background research is required that includes a record search at the South Coastal Information Center (SCIC) at San Diego State University. A review of the Sacred Lands File maintained by the NAHC shall also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

In addition to the records searches mentioned above, background information may include, but is not limited to, examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews, including consultation with descendant communities. The results of the background information would be included in the evaluation report.

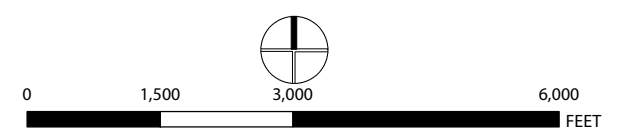
Figure 4.6-1: Cultural Resources Sensitivity



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

 Trolley Stops	Sensitivity	 Mission Valley Community Plan Boundary
 Light Rail	 Low Sensitivity	 Community Planning Areas
 Freeways	 Moderate Sensitivity	
 Ramps	 High Sensitivity	

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Once the background research is complete, a field reconnaissance shall be conducted by individuals whose qualifications meet City standards. Consultants shall employ innovative survey techniques when conducting enhanced reconnaissance including, but not limited to, remote sensing, ground penetrating radar, human remains detection canines, LiDAR, and other soil resistivity techniques as determined on a case-by-case basis by the tribal representative during the project-specific AB 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or tribal cultural resources. If, through background research and field surveys, resources are identified, then an evaluation of significance, based on the City's Guidelines, shall be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or tribal cultural resource (as defined in the PRC) is identified, the City shall initiate consultation with identified California Indian tribes pursuant to the provisions in PRC sections 21080.3.1 and 21080.3.2, in accordance with AB 52. It should be noted that during the consultation process, tribal representative(s) will be involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City of San Diego's Historical Resources Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program shall be evaluated against the Significance Thresholds found in the Historical Resources Guidelines. If significant historical resources are identified within the area of potential effects, the site may be eligible for local designation. However, this process will not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report shall be submitted to Historical Resources Board (HRB) staff for designation. The final testing report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility

for designation under the applicable criteria. This process shall be completed prior to distribution of any draft environmental document.

An agreement with each consulting tribe on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

Step 3

Preferred mitigation for archaeological resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Archaeological Data Recovery Program (ADRP) is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. The data recovery program shall be reviewed and approved by the City's Environmental Analyst prior to distribution of any draft environmental document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations on public or private property, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site, would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, State, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent

project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Historical Resources Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. A confidential appendix must be submitted (under separate cover), along with historical resource reports for archaeological sites and tribal cultural resources, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project, and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information and final reports recovered during public and/or private development projects must be permanently curated

with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with State and federal standards, unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historical deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., Assembly Bill 2641 [Coto] and California Native American Graves and Repatriation Act of 2001 [Cal NAGPRA] [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA [USC 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

Development implemented in accordance with the project could potentially result in impacts to significant archaeological resources, and therefore would be required to implement Mitigation Measure MM-CULT-2, which addresses measures to minimize impacts to archaeological resources. This mitigation, combined with the policies of the General Plan and proposed CPU policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and PRC Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historical Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to prehistoric or historical archaeological resources. However, even with application of the existing regulatory framework and mitigation framework which would reduce and/or minimize future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

Impact 4.6-3: Tribal Cultural Resources

Would implementation of the proposed CPU result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

While much of the Mission Valley community has been developed, it consists of a heavily active, depositional river valley utilized over thousands of years by the Kumeyaay people, and the potential for intact cultural deposits at depth is probable at many locations. As such, a Sacred Lands File Check was requested from the NAHC by City staff with initiation of the community plan update in 2009 in accordance with the provisions of SB 18. The NAHC response indicated that although the search for sacred lands resulted in a negative finding, the absence of specific resources information in the Sacred Lands File does not preclude the presence of Native American cultural resources in the CPU area and an updated list of tribal contacts specific to the CPU area for that purpose was provided by the NAHC for consultation during the environmental review process. Letters were sent via email to the tribal contacts describing the City's CPU process, formally inviting tribal representatives to request consultation or additional information within the 90-day period pursuant to the provisions of SB 18; however, no responses have been received to date.

Additionally, a literature search and archival research was conducted at the SCIC and a Sacred Lands File Check was initiated by Tierra Environmental Services in 2016 to support the Cultural Resources Constraints Analysis for the proposed CPU. Two responses were received, one of which identified the potential for the discovery of tribal cultural resources in the CPU area. Through subsequent email correspondence, Mr. Clint Linton, Director of Cultural Resources for the Iipay Nation of Santa Ysabel noted several areas of concern in the San Diego River Valley associated with the ethnohistoric village of *Kosti/Cosoy/Kosaii/Kosa'aay*, and the potential for impacting human remains. Mr. Linton also identified the need for a large buffer zone around the Mission San Diego de Alcalá, and that all projects within the boundary of this analysis should be subject to Kumeyaay [Native American Monitor] involvement, giving the [Native American Monitors] a chance to review individual projects and request their involvement as appropriate.

In July 2017, the City of San Diego sent the NOP for the PEIR to all culturally affiliated Native American tribes, organizations, and individuals and included notification to all tribal groups in San Diego County. In October 2017, in accordance with AB 52, project notification letters and the draft Cultural Resources Constraints Analysis were sent to Ms. Lisa Cumper, Tribal Historic Preservation Officer (THPO) from the Jamul Indian Village and Mr. Clint Linton, representing the Iipay Nation of Santa Ysabel providing an opportunity to consult on the proposed CPU.

Consultation was initially conducted in 2017 which addressed the CPU scope, proximity of the ethnohistoric village of *Kosti/Cosoy/Kosaii/Kosa'aay* and the importance of the River Valley to the Kumeyaay community, as well as a discussion regarding assurance that human remains would not be impacted with future projects. While this cannot be guaranteed at the program level, the proposed mitigation framework was discussed, including the specific procedures for project review, tribal consultation, and proper treatment of Tribal Cultural Resources at the project level. Consultation was considered “on-going” in order to address pending updated records search information and revisions to the draft Cultural Resources Report. Subsequent consultation with the culturally affiliated tribal groups identified above pursuant to both SB 18 and AB 52 is ongoing was conducted in January/February 2019 with a follow-up presentation/discussion in March 2019. Correspondence was received from Mr. Clint Linton in late January 2019 indicating a request to cross reference the prehistoric archaeological search results to identify sites with known human remains from past projects. Mr. Linton further recommended that all areas with sites should be monitored and those with known human remains should be avoided. any During the follow-up consultation meeting in March, the updated records search review/results and expansion of high sensitivity areas were further discussed, along with tribal cultural identity and the importance of Native American monitoring with respect to the community plan boundaries and associated future development. Staff confirmed the City’s commitment to subsequent implementation of the Mitigation Framework for future projects which assures consultation with culturally affiliated tribes early in the environmental review process. No additional requirements or recommendations were requested will to be incorporated into the Final EIR, and consultation was concluded.

As stated, the Sacred Lands File check from the NAHC indicated that no sacred lands have been identified within the vicinity of the CPU area. Several key areas have been identified, however, that may be of high interest to local Native American communities, such as the Mission San Diego de Alcalá within the CPU area, and the Presidio de San Diego, located in proximity to the CPU area. Both of these resources are already listed on the City’s Historical Resources Register, the CRHR, and the NRHP. For any subsequent projects implemented in accordance with the proposed CPU where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code sections 21080.3.1 and 21080.3.2, in accordance with AB 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the project and appropriate mitigation measures for direct impacts that cannot be avoided.

A policy to ensure that Native American consultation is conducted early in the project review process is also included in the proposed CPU to identify tribal cultural resources, and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, State and federal regulations and guidelines.

While existing regulations, the SDMC, and proposed CPU policies would provide for the regulation and protection of tribal cultural resources, it is not possible to ensure the successful preservation of all tribal cultural resources. Therefore, potential impacts to tribal cultural resources would be significant. Mitigation Measure MM-CULT-2 would address potential significant impacts. However, even with application of the existing regulatory framework and mitigation framework, impacts to tribal cultural resources would be significant and unavoidable.

Mitigation Measures

Development implemented in accordance with the proposed CPU would potentially result in impacts to significant tribal cultural resources, and therefore, would be required to implement Mitigation Measure MM-CULT-2, which addresses measures to minimize impacts to tribal cultural resources. This mitigation, combined with the policies of the General Plan and proposed CPU policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historical Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to tribal cultural resources. However, even with application of the existing regulatory framework and mitigation framework, impacts to tribal cultural resources would remain significant and unavoidable.

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4.7 Hydrology and Water Quality

This section analyzes the potentially significant impacts to hydrology and surface and groundwater quality that would result from implementation of the proposed CPU. It relies on the Hydrology and Water Quality Report Existing Conditions Analysis prepared by Rick Engineering Company (Water Quality Report) (Appendix I), secondary source information, and policies contained within the proposed CPU. This section describes the existing conditions in the CPU area as well as relevant plans, policies, and regulations.

4.7.1 Environmental Setting

4.7.1.1 PHYSICAL SETTING

Hydrology

Drainage

The CPU area is located within the San Diego River Watershed. It is specifically located within the Mission San Diego Hydrologic Subarea (907.11) of the Lower San Diego Hydrologic Area (907.1) of the San Diego Hydrologic Unit (907.00). Figure 4.7-1 shows the San Diego River Watershed. The CPU area encompasses the lower 6.5 miles of the San Diego River and is located in one of the most downstream locations of the San Diego River Watershed, making Mission Valley the recipient of storm water runoff from upstream communities. Surface water bodies within Mission Valley include Alvarado Creek, Murphy Canyon Creek, Murray Canyon Creek, the San Diego River, and a few unnamed creeks.

The CPU area is surrounded by steep hills on its north and south sides, sloping towards the San Diego River. Storm water runoff originating in Mission Valley is conveyed to the San Diego River via streets, gutters, cross gutters, open channels, and storm drain systems, with flows conveyed by the San Diego River to the Pacific Ocean. Existing storm drain locations within the City's storm drain inventory are shown on Figure 4.7-2.

Several existing bridges and road crossings/culverts cross the San Diego River in the CPU area. All of the road crossings/culverts are low water crossings, also known as ford crossings, which are roads designed to allow temporary flooding or overtopping to convey river flow across the roadway during large storm events. The roads with ford crossings operate as normal vehicular river crossings when the river level is normal and during smaller storm events, but flood during heavy rains. Bridges and road crossings/culverts on the San Diego River are listed below and shown in Figure 4.7-3.

Bridges (listed from east to west) include:

- Ward Road
- Interstate (I-) 15
- I-805
- State Route 163 (SR-163)
- Riverwalk Golf Course bridges
- Morena Boulevard
- San Diego Metropolitan Transit System Trolley
- Pacific Highway

Road crossings/culverts (listed from east to west) include:

- San Diego Mission Road
- Qualcomm Way
- Camino Del Este
- Mission Center Road
- Avenida Del Rio
- Fashion Valley Road

Flooding and Floodplains

The primary source of flooding in Mission Valley is the San Diego River, with flooding also associated with the Alvarado, Murphy Canyon, and Murray Canyon creeks. Flooding in Mission Valley can occur during and after heavy rains. Road crossings/culverts and the Ward Road Bridge are impassable during some storm events. Avenida Del Rio, Fashion Valley Road, and San Diego Mission Road are the most susceptible to flooding and typically flood in 5-year storm events and greater. Camino Del Este, Qualcomm Way, and Mission Center Road typically flood in 10-year storm events and greater. Ward Road Bridge is susceptible to flooding during 20-year storm events and greater. The 100-year floodway, 100-year floodplain, and 500-year floodplain for Mission Valley are delineated by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate maps (FIRMs) and are illustrated in Figure 4.7-4. According to FEMA maps, there are a total of 447 acres within the 100-year floodway, 304 acres are outside the floodway but within the 100-year floodplain, and an additional 803 acres are within the 500-year floodplain. The following areas of Mission Valley are within the 100-year floodplain of the San Diego River:

- East of I-15 – portions of Ward Road (bridge), San Diego Mission Road (low water crossing), and Camino Del Rio North;
- West of I-15 – portions of the Stadium parking lot (flooding is due to the San Diego River and Murphy Canyon Creek);

- West of I-805 – a portion of Qualcomm Way, from Friars Road to the San Diego River (low water crossing often flooded during lower storm events);
- Camino Del Este road crossing (low water crossing very frequently flooded during lower storm events);
- Mission Center Road from Friars Road to the San Diego River (low water crossing often flooded during lower storm events);
- Between I-805 and State Route (SR-) 163, south of the San Diego River – portions of Camino De La Reina, Camino Del Rio North, Camino De La Siesta, and Camino Del Arroyo;
- West of SR-163 – Avenida Del Rio and portions of Fashion Valley Road (low water crossings very frequently flooded during lower storm events);
- Portions of Fashion Valley Mall parking (structures on south side of mall and west parking lot south of JC Penney);
- Portions of Camino De La Reina, Town and Country Resort and Convention Center, Riverwalk Golf Club, Handlery Hotel, Hotel Circle North, and Hotel Circle South;
- Portions of I-8 between SR-163 and I-5;
- YMCA along Friars Road; and
- At-grade trolley stations at Morena Boulevard/Linda Vista Road, Mission Valley Center, Fenton Parkway, and Mission San Diego. Additionally, access to elevated stations at Fashion Valley and San Diego County Credit Union Stadium may be interrupted due to flooding on local roads and parking areas.

Figure 4.7-5 overlays the 100-year floodway and floodplain on the adopted Mission Valley Community Plan land use designations. As shown on Figure 4.7-5, the 100-year floodway is mostly, though not completely, occupied by land designated as Open Space. The floodway is also occupied by land designated as Multi-Use, Commercial Recreation, Commercial Retail, Commercial Office, Public Facility, and Public Recreation. While most of the 100-year floodplain is occupied by land designated for Recreation and Open Space, it is also occupied by land designated as Office, Multi-Use, and Residential. Currently, there are a number of commercial and residential land uses in the 100-year floodplain including several hotels, car dealerships, and residential developments.

Improvements along the San Diego River will occur in the future as development projects are implemented, such as the proposed construction of Discovery Place, amendments to the Levi-Cushman/Riverwalk Specific Plan, and recent amendments to the Atlas Specific Plan and Mission Valley Community Plan associated with the Town and Country project (approved March 20, 2018).

Dam Inundation Areas

Dam failure is the collapse or failure of an impoundment that causes significant downstream flooding. Flooding of the area below the dam may occur as the result of structural failure or overtopping of the dam. There are several dams upstream of the CPU area. Based on 2009 SanGIS data, the CPU area is within the inundation pathway of the following dams as shown in Figure 4.7-6:

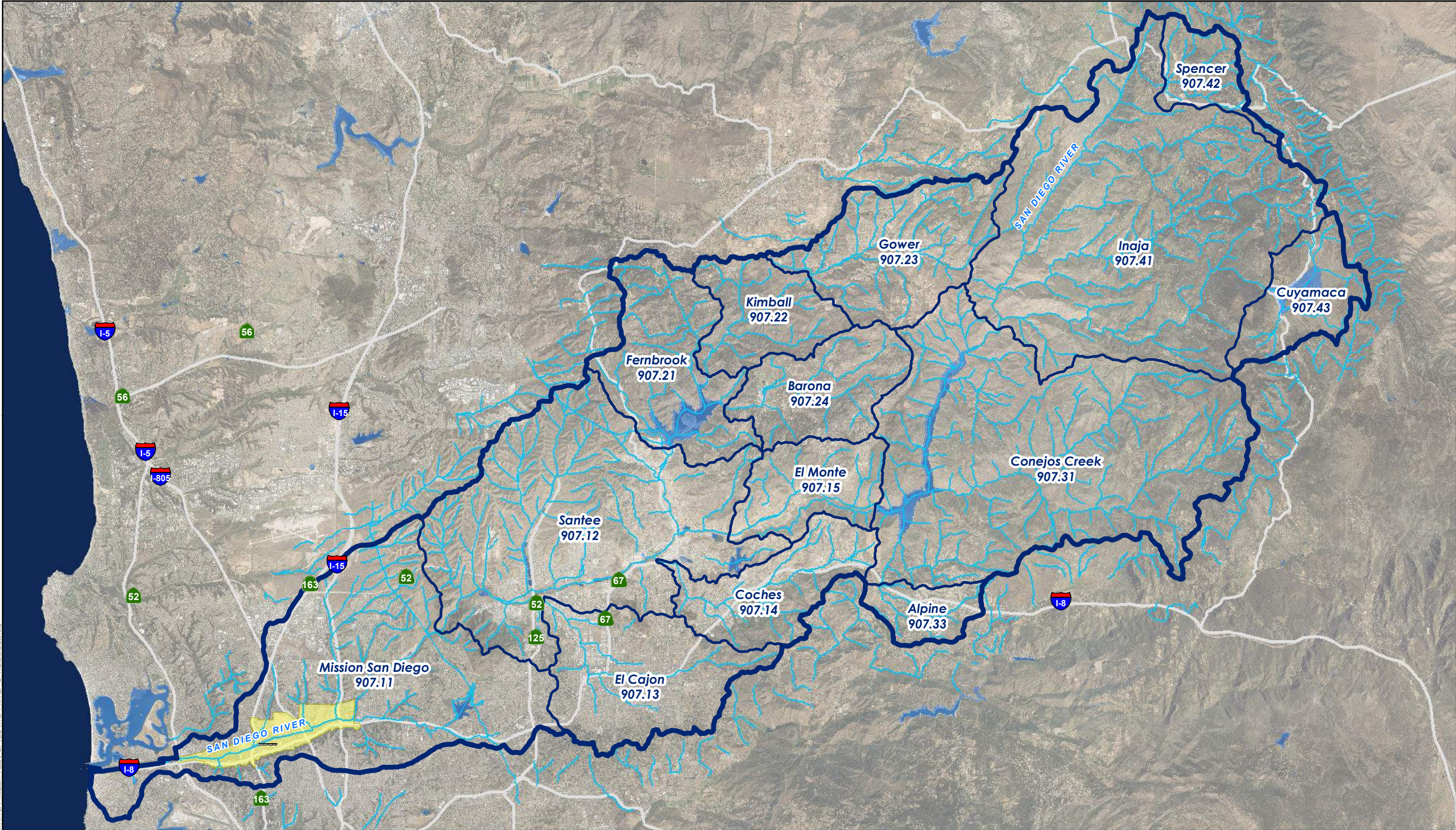
- Grossmont Dam (Grossmont Reservoir), which drains to Alvarado Creek which drains to the San Diego River;
- Murray Dam (Lake Murray), which drains to Alvarado Creek which drains to the San Diego River;
- Cuyamaca Dam (Lake Cuyamaca), which drains to Boulder Creek which drains to the San Diego River;
- Chet Harritt Dam (Lake Jennings), which drains to the San Diego River;
- San Vicente Dam (San Vicente Reservoir), located on San Vicente Creek which drains to the San Diego River; and
- El Capitan Dam (El Capitan Reservoir), located on the San Diego River.

With the exception of Grossmont Dam, the inundation pathways for these dams are wider than the 100-year special flood hazard area of the San Diego River. Flows resulting from dam failure generally are much larger than the capacity of downstream channels and, therefore, can lead to extensive flooding. The inundation pathways for El Capitan Dam and San Vicente Dam are the widest, filling the entire valley floor, generally bounded by steep canyon walls on the south and Friars Road on the north.

Tsunami and Seiche

A tsunami is a sea wave generated by a submarine earthquake, landslide, or volcanic action. No portion of the CPU area lies within a tsunami inundation zone. A seiche is an earthquake-induced wave in a confined body of water, such as a lake, reservoir, or bay. However, no portion of the CPU area lies near a confined body of water on which a seiche could be expected to occur.

Figure 4.7-1: San Diego River Watershed



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Legend

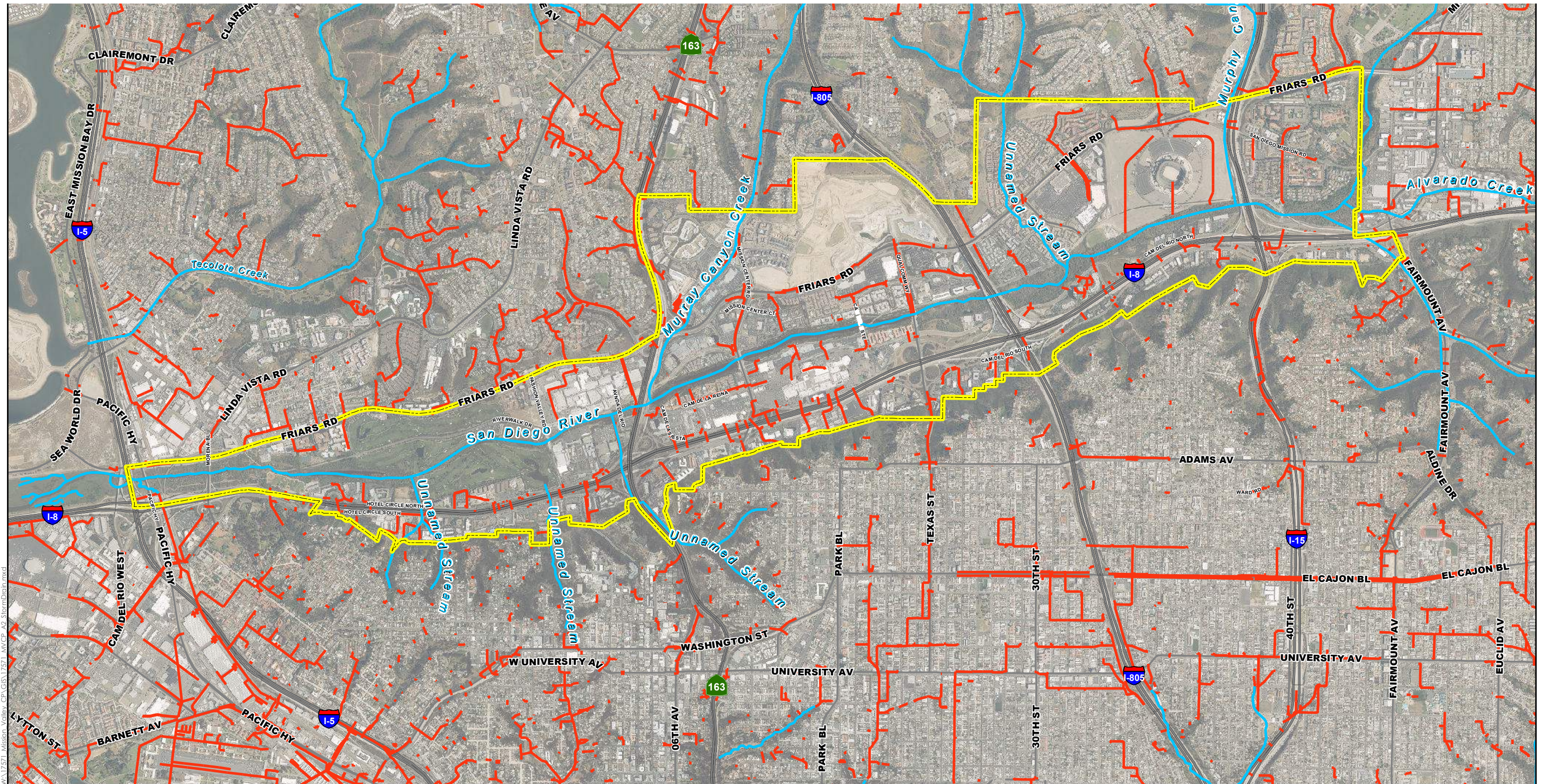
- San Diego Hydrologic Unit (907.00)
- Hydrologic Subarea (e.g. Santee 907.12)
- River, Creek, Stream
- Mission Valley Community

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Data Source: SANGIS San Diego Community Plan, 2014; National Hydrology Dataset (NHD) Flowline; SANGIS Hydrologic Basins per CA Department of Forestry, 2003; Rick Engineering, 2017; Dyett & Bhatia, 2015



Figure 4.7-2: Rivers, Creeks, and Storm Drains



- Legend**
- Mission Valley Community
 - River, Creek, Stream
 - Storm Drain Conveyance

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Data Source: SANGIS San Diego Community Plan, 2014; National Hydrology Dataset (NHD) Flowline; SANGIS Drain Conveyance, 2010; Rick Engineering, 2017; Dyett & Bhatia, 2015

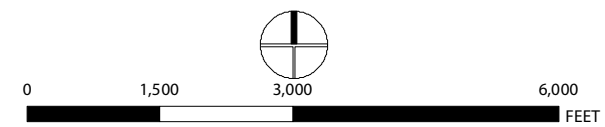
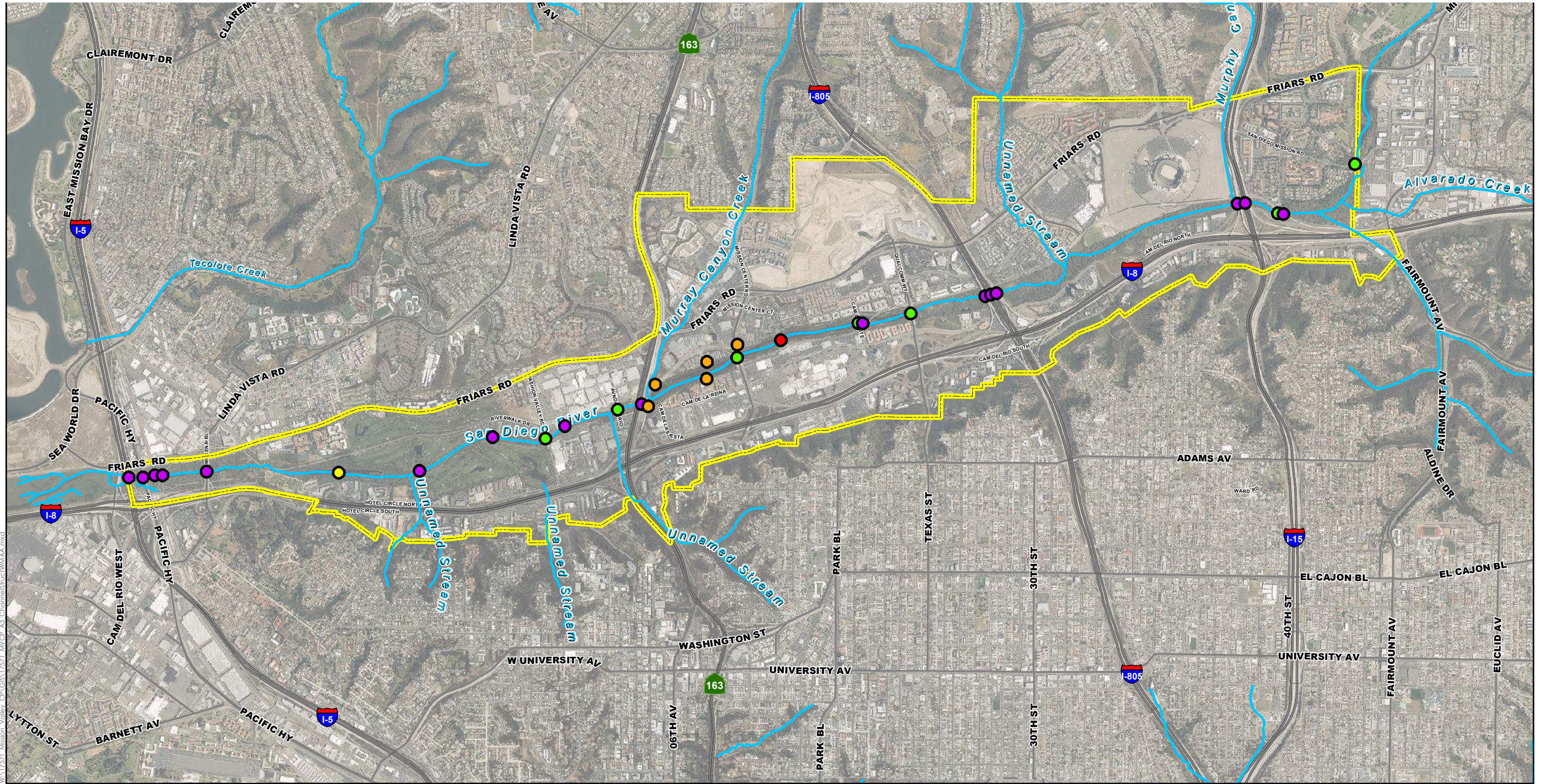


Figure 4.7-3: Channel Structures on San Diego River



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Channel Structures (WMAA)

Legend	Bridge
Mission Valley Community	Culvert
River, Creek, Stream	Drop Structure
	Levee
	Weir

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Data Source: SANGIS San Diego Community Plan, 2014; National Hydrology Dataset (NHD) Flowline; SANGIS Assessor Parcels, 2015; Rick Engineering, 2017; Dyett & Bhatia, 2015

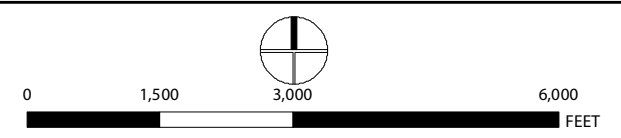
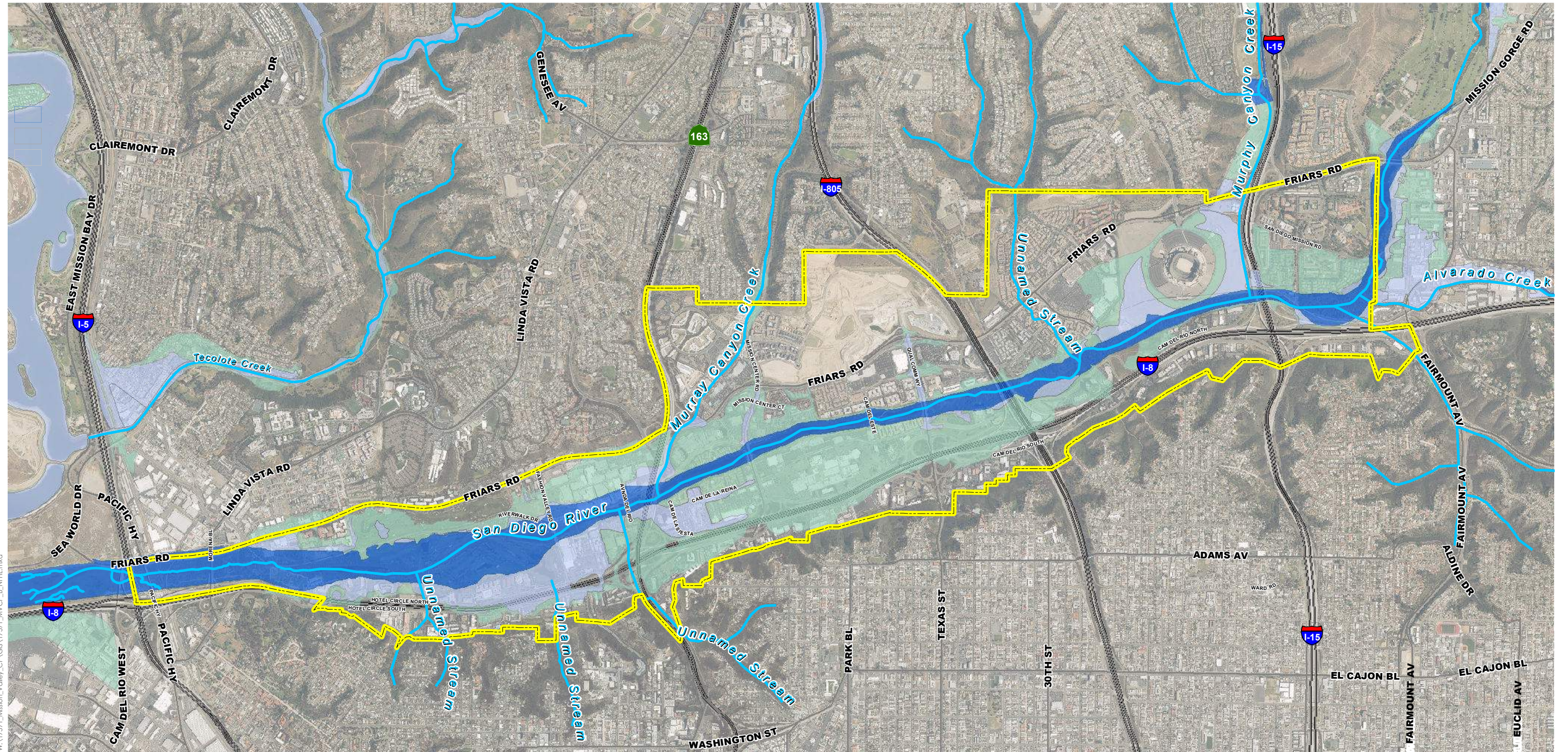


Figure 4.7-4: FEMA Floodplain and Floodways



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- Legend**
- Mission Valley Community
 - River, Creek, Stream

- FEMA National Flood Hazard Layer (NFHL)**
- 100-YR Floodway
 - 100-YR Floodplain
 - 500-YR Floodplain

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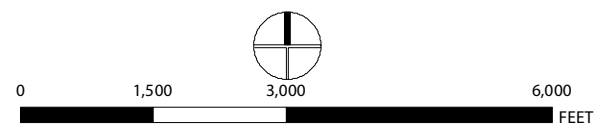
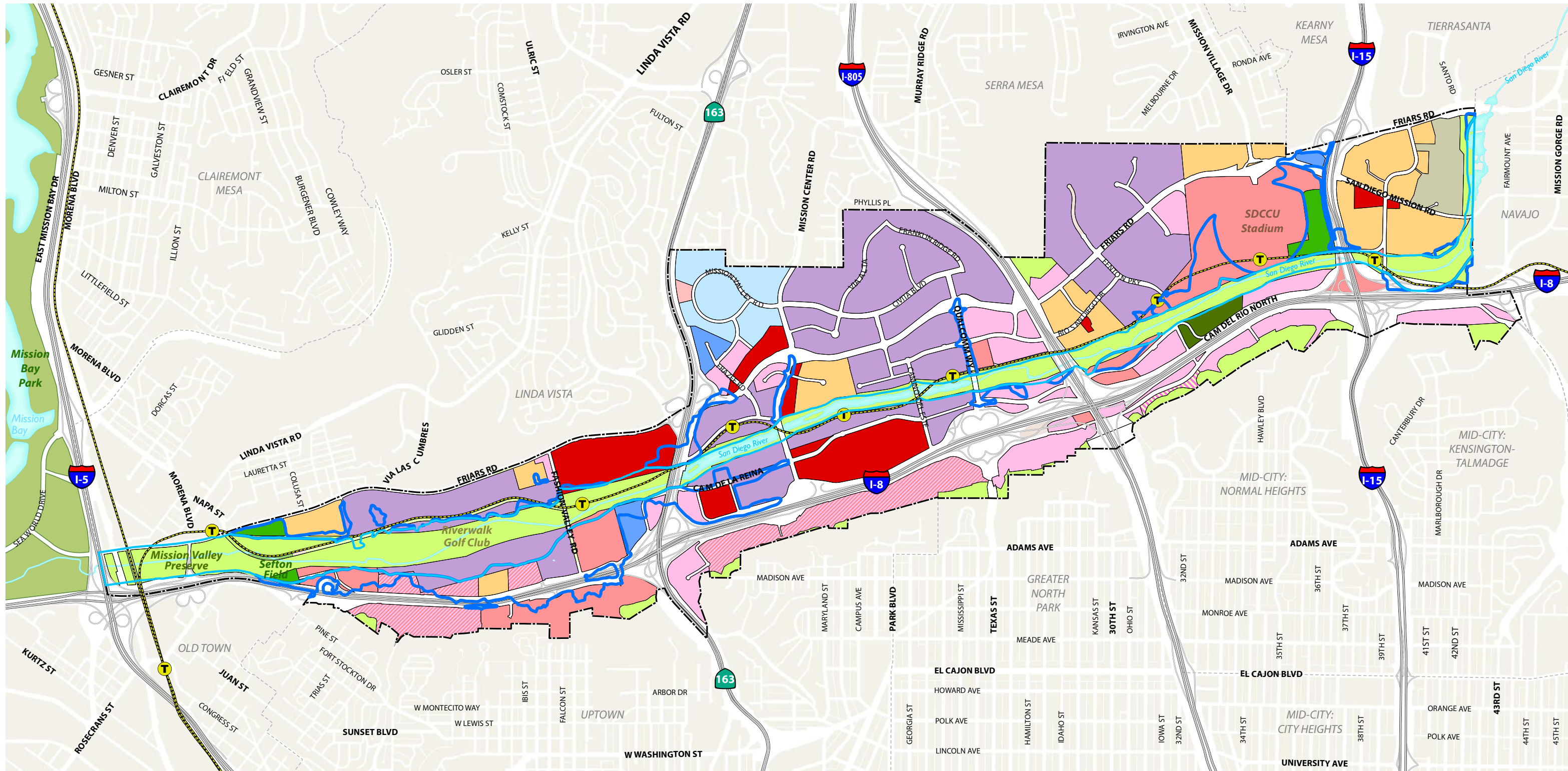


Figure 4.7-5: Existing Community Plan Land Uses within the 100 year Floodplain and Floodway



Trolley Stops	Lakes/Ponds/Bays	FEMA Flood Classification	Community Plan Land Use	Commercial Recreation	Industrial Park
Light Rail	Community Planning Areas	100-year Floodplain	Residential	Office or Commercial Recreation	Mission and School
Freeways	Mission Valley Community Plan Boundary	100-year Floodway	Residential/Office Mix	Visitor Commercial	Open Space
Ramps			Commercial Retail	Multi-Use	Public Recreation
Streams/Creeks			Commercial Office	Business / Industrial	Public Facility

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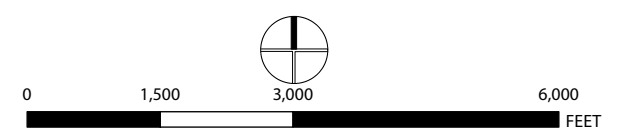
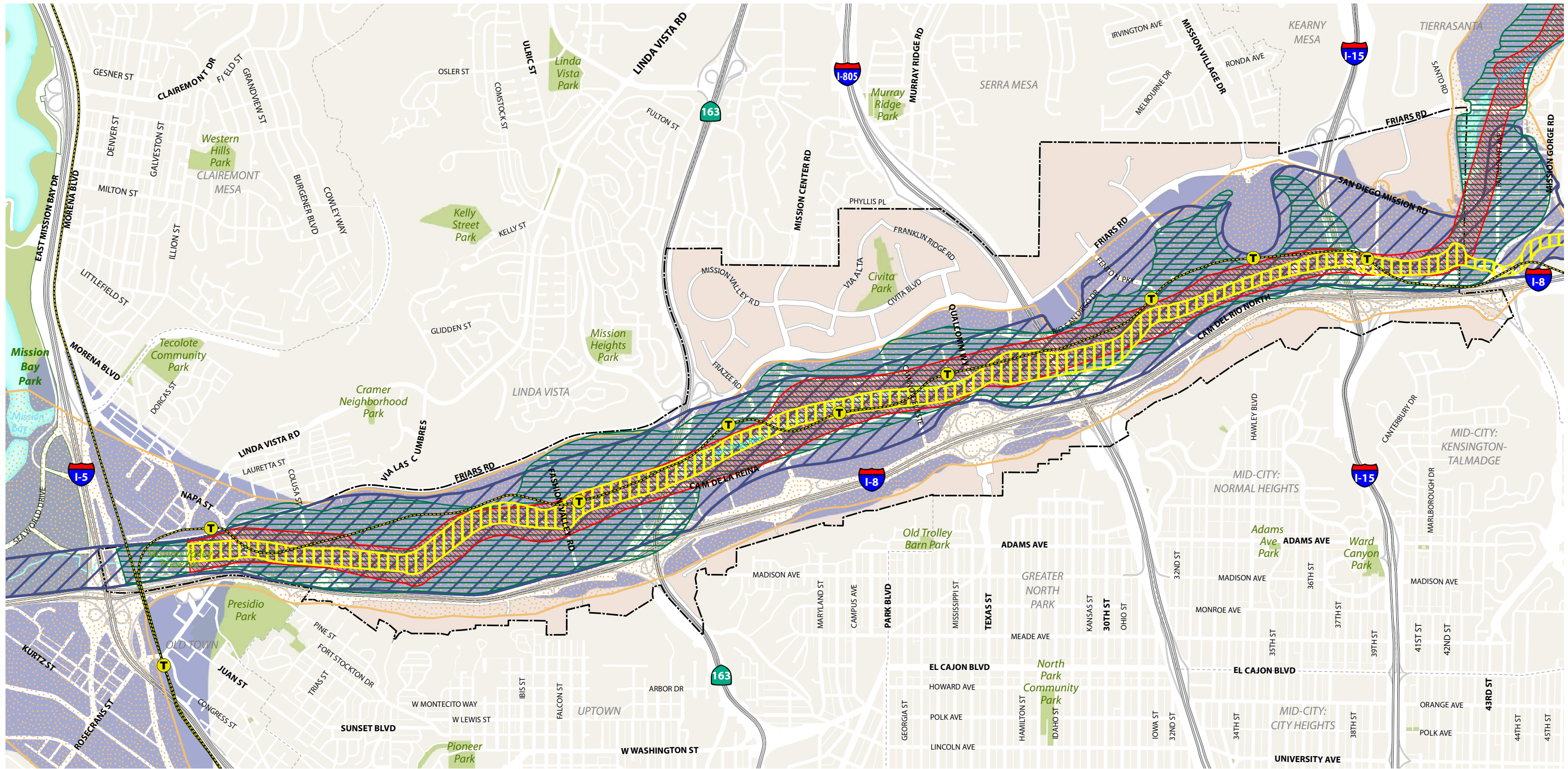
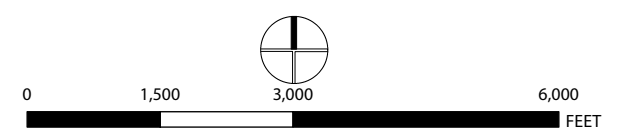


Figure 4.7-6: Dam Inundation Areas



Trolley Stops	Dam Inundation Areas	San Vicente Dam	Parks
Light Rail	Grossmont Dam	El Capitan Dam	Lakes/Ponds/Bays
Freeways	Cuyamaca Dam	Mission Valley Community Plan Boundary	Community Planning Areas
Ramps	Chet Harritt Dam		
Streams/Creeks	Murray Dam		

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Water Quality

The San Diego River and Pacific Ocean at the mouth of the San Diego River are the receiving waters of storm water runoff from the CPU area. The CPU area is mostly developed, resulting in a highly impervious setting. Nearly all rainfall landing on the developed areas of the CPU area becomes runoff due to a lack of infiltration opportunity and is conveyed into the San Diego River. Receiving waters are directly impacted from the quality of storm water runoff from Mission Valley and other communities within the County of San Diego that contribute runoff to the San Diego River and ultimately the Pacific Ocean.

Local Storm Water Quality

The Mission Valley community is generally developed outside of the San Diego River and is mostly impervious. The land uses that make up Mission Valley generate a number of pollutants, including sediment, nutrients, heavy metals, organic compounds, trash, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides. All of these pollutants can have a detrimental impact on the water quality of receiving waters.

Pollutants are conveyed through storm drain systems and streets into receiving waters with generally very little opportunity for infiltration due to the highly developed nature of the community. Most of the existing development within Mission Valley occurred prior to the adoption of current storm water regulations and requirements, resulting in a lack of Best Management Practices (BMPs) that meet current standards, such as source control, low impact development (LID), or structural BMPs, to reduce storm water runoff.

Local Receiving Water Quality

Storm water runoff generated in Mission Valley flows to two receiving water bodies: the Lower San Diego River and the Pacific Ocean Shoreline (at the San Diego River Outlet at Dog Beach). These two water bodies are listed as impaired on the current Clean Water Act (CWA) Section 303(d) List. Pollutants causing impairment for the Lower San Diego River are enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids, and toxicity. Pollutants causing impairment at the Pacific Ocean Shoreline at the Ocean Beach Dog Beach outlet are enterococcus and total coliform. Impaired water bodies are subject to Total Maximum Daily Load (TMDL) regulations, which set the maximum amount of the pollutant of concern that a water body can receive and still attain water quality standards. TMDLs have been established only for enterococcus, fecal coliform, and total coliform for the Pacific Ocean Shoreline, with TMDLs for all other pollutants undetermined at this time.

4.7.1.2 REGULATORY SETTING

Federal Regulations

Clean Water Act

The CWA (33 United States Code §1251 et seq.) (1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

Section 401 of the CWA requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the U.S.

Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop TMDLs to identify the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

National Flood Insurance Act

The National Flood Insurance Act (1968) established the NFIP, which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within Special Flood Hazard Areas (SFHAs). FEMA administers the NFIP. SFHAs are defined as areas that have a 1-percent chance of flooding within a given year. This is also referred to as the 100-year flood.

National Flood Insurance Program

The NFIP is a federal program enabling property owners in participating communities to purchase insurance protection against losses from flooding. This insurance is designed to provide an insurance alternative to disaster assistance to meet the escalating costs of repairing damage to buildings and their contents caused by floods. Participation in the NFIP is based on an agreement between local communities and the federal government that states that, if a community will adopt and enforce a floodplain management ordinance to reduce future flood risks to new construction in SFHAs, the federal government will make flood insurance available within the community as a financial protection against flood losses.

In support of the NFIP, FEMA identifies flood hazard areas throughout the United States and its territories by producing Flood Hazard Boundary Maps, FIRMs, and Flood Boundary and Floodway Maps. Several areas of flood hazards are commonly identified on these maps. One of these areas is

the SFHA or high-risk area defined as any land that would be inundated by the 100-year flood, or a flood with a 1-percent chance of occurring in any given year (also referred to as the base flood).

As a participant in NFIP, the City is required to institute adequate land use and development control measures for preventing and reducing property damage from flooding. In addition, the City ensures that projects within or fringing on a floodway or floodplain comply with FEMA regulations and requirements.

State Regulations

California Department of Fish and Wildlife Code – Streambed Alteration Program

The California Department of Fish and Wildlife (CDFW) regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for any project that would impact CDFW jurisdictional resources. The agreement with CDFW typically requires mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or a combination of the three.

State Water Resources Control Board and Regional Water Quality Control Board

In California, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects include the SWRCB Construction General Permit, Industrial General Permit, and the regional Municipal Separate Storm Sewer System (MS4) Permit Order No. R9-2013-0001 (NPDES Permit No. CAS0109266), as amended by Order No. R9-2015-0001 and R9-2015-0100, administered by the RWQCB.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), established the principal California legal and regulatory framework for water quality control. The act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal CWA. The State of California is divided into nine regions governed by the RWQCBs. Within the CPU area, the San Diego RWQCB implements and enforces the provisions of the California Water Code and CWA under the oversight of the SWRCB. The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and other surface waters and groundwater basins and establish water quality objectives for those waters.

Local Regulations

Regional MS4 Permit

The San Diego RWQCB is responsible for permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff. The Storm Water Management Unit of the RWQCB also provides important assistance in dispersing state grant funds to worthy projects that support activities for the reduction and prevention of storm water pollution. As a co-permittee for the Regional MS4 permit under the NPDES and the CWA, the City must implement several storm water management programs, including those designed to control storm water and other discharges from new development and redevelopment.

The San Diego RWQCB regulates discharges from Phase I MS4s in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego Region. The Regional MS4 Permit, Order No. R9-2013-0001 (NPDES Permit No. CAS0109266), was adopted on May 8, 2013 and initially covered the San Diego County co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the Orange County co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the Riverside County co-permittees. The Regional MS4 Permit expired on June 27, 2018 but remains in effect under an administrative extension until it is reissued by the San Diego Water Board. It is anticipated that the San Diego Water Board will adopt proposed changes to the Regional MS4 Permit in late 2019.

The Regional MS4 Permit requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to portions of Orange County and Riverside County within the San Diego Region (Region 9) and made other modifications.

Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas or units, and 147 hydrologic subareas, extending from Laguna Beach southerly to the United States/Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. Mission Valley is located within the San Diego hydrologic unit and the Mission San Diego hydrologic subarea. The San Diego RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

City of San Diego Jurisdictional Runoff Management Plan

The City's Jurisdictional Runoff Management Plan provides a total account of how the City plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the San Diego RWQCB permit referenced above. The document describes how the City incorporates storm water BMPs into land use planning, development review and permitting, City Capital Improvement Program (CIP) project planning and design, and the execution of construction contracts.

San Diego River Watershed Management Area Water Quality Improvement Plan

The MS4 Permit requires development of Water Quality Improvement Plans (WQIPs) that guide the co-permittees' jurisdictional runoff management programs toward achieving improved water quality in MS4 discharges and receiving waters. A San Diego River WQIP was developed by the Cities of El Cajon, La Mesa, San Diego, and Santee; the County of San Diego; and the California Department of Transportation (Caltrans) (2016). The San Diego River WQIP assesses the impacts of storm drain discharges on receiving water quality and identifies a list of priority water quality conditions for the watershed. The highest priority water quality condition identified for the San Diego River watershed is bacteria, in both dry and wet weather conditions. Other priority water quality conditions are nitrogen and phosphorus, total dissolved solids, eutrophic conditions, and an index of biological integrity in dry weather conditions. Implementation of the WQIP furthers the CWA's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

Storm Water Management and Discharge Control Ordinance

As a co-permittee under the MS4 permit issued by the San Diego RWQCB, the City must implement storm water management programs, including programs designed to control storm water discharges from development projects both during construction and on a permanent post-construction basis. The City's Storm Water Management and Discharge Control Ordinance addresses these requirements by requiring construction measures and permanent post-construction BMPs that are required for development projects.

Final Hydromodification Management Plan (2011)

Since the adoption of the Final Hydromodification Management Plan (HMP) in 2011 for San Diego County, RWQCB Permit Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100 was issued. Provision E.3.c. requires Priority Development Projects to implement structural and hydromodification management BMPs that conform to performance requirements that ensure post-project runoff conditions to not exceed pre-development runoff conditions by more than 10 percent.

San Diego Municipal Code

Storm Water Runoff and Drainage Regulations

Chapter 14, Article 2, Division 2 of the SDMC outlines Storm Water Runoff and Drainage Regulations, which apply to all development in the city regardless of whether a development permit or other approval is required.

Floodplain Management

The City has adopted development regulations for SFHAs in SDMC Sections 143.0145 and 143.0146. Within the floodway, the regulations set limitations on land uses, structures, and channelization or other alteration of the river, and require passage of the base flood. Permanent structures are not allowed, and any development (e.g., road crossing) must be offset by improvements or modifications to enable passage of a base flood. Within flood fringe areas, the regulations allow permanent structures and fill for permanent structures, roads, and other development if certain conditions are met.

Environmentally Sensitive Lands Regulations

The City's Environmentally Sensitive Lands (ESL) Regulations (SDMC Chapter 14, Article 3, Division 1) help protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or SHFAs. The intent of the ESL Regulations is to ensure that development occurs in a manner that protects the overall quality of the resources, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

City of San Diego Drainage Design Manual

Drainage design policies and procedures are provided in the City's Drainage Design Manual updated in January 2017 (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides policies and procedures to attain standardization of drainage design throughout the City. The manual also provides design standards and procedures for storm water conveyance and hydrology analysis for flood management and water quality facilities.

Storm Water Standards Manual

The City's 2018 Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the city. The Storm Water Standards Manual is contained in Appendix O of the City's Land Development Manual and is organized in three key parts:

- Part 1: BMP Design Manual - For Permanent Site Design, Storm Water Treatment and Hydromodification Management
- Part 2: Construction BMP Standards
- Part 3: Offsite Storm Water Alternative Compliance Program For Water Quality and Hydromodification Control

Part 1 of the Storm Water Standards Manual, the BMP Design Manual, addresses and provides guidance for complying with on-site post-construction storm water requirements for Standard Projects and Priority Development Projects (PDPs), and provides procedures for planning, preliminary design, selection, and design of permanent storm water BMPs based on the performance standards presented in the MS4 Permit.

Part 2 of the Storm Water Standards Manual addresses storm water impacts and required controls associated with construction activities in the City. The purpose of these standards is to provide guidance to prevent construction activities from adversely impacting downstream and on-site resources through appropriate planning, installation, and maintenance of BMPs. The construction BMP standards provide guidance on providing the appropriate BMPs to prevent discharges of pollutants associated with construction activity.

Part 3 of the Storm Water Standards Manual addresses the Offsite Storm Water Alternative Compliance Program (Offsite Alternative Compliance Program) developed by the City to allow mitigation of PDP storm water impacts through implementation of off-site structural BMPs. The program allows for offsite control of water quality and hydromodification impacts, provides design options and flexibility in the case of site infeasibility, and provides the potential for more effective regional storm water control solutions to improve watershed scale water quality.

City of San Diego General Plan

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element presents goals and policies related to storm water infrastructure, water quality, and pollution prevention. Overall goals include the protection of beneficial water resources through pollution prevention and interception efforts and implementation of a storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable. Applicable policies address ensuring storm water conveyance systems, structures, and maintenance practices are consistent with federal CWA and California RWQCB NPDES Permit standards; installing infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies; meeting and exceeding regulatory mandates to protect

water quality in a cost-effective manner monitored through performance measures; fostering a comprehensive approach to storm water infrastructure improvements; identifying and implementing BMPs for projects that repair, replace, extend or otherwise affect the storm water conveyance system; and identifying partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements.

Conservation Element

The Conservation Element presents goals and policies related to floodplains, erosion control, and managing runoff and sedimentation during and after development. Applicable goals include preservation and long-term management of the natural landforms and open spaces that help make San Diego complete; protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property.

Associated policies address applying appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands; managing watersheds and regulating floodplains to reduce disruption of natural systems; restoring water filtration, flood and erosion control, biodiversity and sand replenishment benefits; limiting grading and alterations of steep hillsides, cliffs, and shoreline to prevent increased erosion and landform impacts; and limiting and controlling runoff, sedimentation, and erosion both during and after construction activity.

Urban Runoff Management Policies include applying water quality protection measures to land development projects early in the project design process to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff; increasing on-site infiltration, and preserving, restoring or incorporating natural drainage systems into site design; directing concentrated drainage flows away from the Multi-Habitat Planning Area and open space areas; reducing the amount of impervious surfaces through selection of materials, site planning, and street design where possible; increasing the use of vegetation in drainage design; maintaining landscape design standards that minimize the use of pesticides and herbicides; avoiding development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.

Policies support enforcement of maintenance requirements in development permit conditions; requiring contractors to comply with accepted storm water pollution prevention planning practices for all projects; minimizing the amount of graded land surface exposed to erosion and enforcing erosion control ordinances; and continuing routine inspection practices to check for proper erosion control methods and housekeeping practices during construction. Floodplain policies include managing floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.

San Diego River Park Master Plan

The San Diego River Park Master Plan was adopted by the City (Resolution No. R-308196) on May 20, 2013. The Master Plan provides recommendations and guidelines to be considered when updating Community Plans located along the San Diego River and is the primary policy document for land use policies along and adjacent to the San Diego River. The plan includes design guidelines that apply to the River Corridor Area and the River Influence Area only. The River Corridor Area is the 100-year floodway (as mapped by FEMA), plus 35 feet on both sides of the floodway to accommodate a pathway corridor. The River Influence Area extends 200 feet beyond the River Corridor Area on both sides of the river. Further discussion regarding the proposed CPU's consistency with this planning document is provided in Section 4.8: Land Use.

First San Diego River Improvement Project

The First San Diego River Improvement Project (FSDRIP) Specific Plan was intended to implement and maintain a 100-year flood control channel, replant and permanently preserve natural riparian and upland habitat, and provide an urban corridor for transportation and recreation along approximately 7,000 feet (approximately 1.3 miles) of the San Diego River from Qualcomm Way west to SR-163, an area that covers approximately 45 acres. Flood control improvements associated with this Specific Plan include the construction of a flood control channel, institution of buffer zones, and planting and preserving of riparian and upland habitat.

The United States Army Corps of Engineers (USACE) implemented the flood control measures by reconfiguring the existing floodway, narrowing and deepening the floodway (by dredging), and providing ponds for retention during storm events. The channel was revegetated with native plants that are required to be maintained in perpetuity within the limits of FSDRIP. The project was completed in 1988.

On February 2, 2004, the City adopted a Natural Resources Management Plan (NRMP) for FSDRIP to provide for the future protection and sustainable management of the natural resources within FSDRIP, pursuant to the USACE permit and conditions. The NRMP is the operational document for maintenance and management of FSDRIP and is consistent with the adopted Mission Valley Community Plan (1985). The City's Parks and Recreation Department is responsible for NRMP implementation.

Adjacent developments and maintenance activities must follow management and maintenance guidelines outlined in the NRMP. Any activity that could result in habitat disturbance must follow mitigation restoration guidelines in the NRMP. Other guidelines that apply to development projects include fencing of the FSDRIP limits during construction on adjacent properties, replanting of disturbed areas with appropriate native plant species, and limited passive recreation.

4.7.2 Impact Analysis

4.7.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to hydrology and water quality are based on the City's CEQA Significance Determination Thresholds (2016), which have been modified to reflect a programmatic analysis of the proposed CPU. A significant impact to hydrology and water quality could occur if implementation of the proposed CPU would:

- 1) Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff;
- 2) Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or
- 3) Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge.

4.7.2.2 METHODOLOGY AND ASSUMPTIONS

Potential impacts resulting from implementation of the proposed CPU were evaluated based on relevant information from the Water Quality Report Existing Conditions Analysis prepared by Rick Engineering Company (Appendix I) and a review of relevant hydrology and water quality plans, and maps.

4.7.2.3 IMPACTS

Impact 4.7-1: Flooding and Drainage Patterns

Would the proposed CPU result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?

Flooding sources in the CPU area include local surface runoff from developed areas and riverine flooding from the San Diego River and its tributaries. Management of local surface runoff and riverine flooding are discussed separately below, as each type of flooding has different considerations and different management requirements. An additional potential source of flooding is the failure of a dam upstream of the CPU area. Dam failure and other hazards are also discussed individually in this section.

Local Surface Runoff

The majority of the CPU area is developed and is highly impervious in the existing condition. Large areas of impervious surfaces (buildings, roadways, and surface parking) are interspersed with a smaller amount of pervious areas. Future buildout of the proposed CPU could result in new or increased impervious surfaces. For example, the Riverwalk development proposes new commercial/office, mixed-use, and residential uses in an area that is currently pervious (currently

Riverwalk Golf Course), and several proposed new roadways or widening of existing roadways could increase imperviousness affecting surface runoff. However, due to the large amount of impervious surface associated with existing development, buildout of the proposed CPU is not expected to create a substantial increase in impervious surfaces and associated increased runoff. Buildout of the proposed CPU in the form of redevelopment may also decrease impervious surfaces by replacing development constructed prior to current storm water and LID requirements with new development that would be required to adhere to current storm water and LID requirements. Current requirements in the City's current Storm Water Standards Manual were not in effect at the time the majority of the CPU area was initially developed. Implementation of LID practices in previously developed areas would either not exacerbate the rate or volume of surface runoff within the CPU area, or would improve surface runoff conditions.

Where buildout of the proposed CPU would result in increased impervious surfaces, the volume or rate of runoff from the new or increased impervious surfaces would not exceed the capacity of existing or planned storm water drainage systems, result in flooding on- or off-site, or result in substantial erosion or siltation on- or off-site because future development would be required to comply with City regulations, including the drainage regulations in the City's Drainage Design Manual. The basic objectives of these regulations are to collect, transmit, and discharge drainage in a manner to promote public safety and provide for low maintenance. The objectives include comparing and coordinating proposed design with existing structures and systems handling the same flows, and other specific requirements. Adherence to the requirements of the City's Drainage Design Manual would ensure that buildout of the proposed CPU would not increase the rate or amount of surface runoff generated from the community in a manner that would exceed the capacity of existing or planned storm water drainage systems or result in flooding on- or off-site.

Buildout of the proposed CPU would also be required to comply with the hydromodification management requirements described in the City's Storm Water Standards Manual. These requirements have been developed to comply with the Regional MS4 Permit, which requires implementation of on-site BMPs to manage hydromodification that may be caused by storm water runoff discharged from a project. Typical features employed on a project site to control the rate and volume of runoff are retention/infiltration basins, biofiltration basins, or detention basins. Under the 2011 Final HMP, the San Diego River from the Pacific Ocean to the confluence with San Vicente Creek was determined to be not susceptible to erosion from increased flow rates and volumes from new impervious areas. This determination of ~~no risk of flooding~~ means that future development within the CPU area that drains directly to the San Diego River via hardened conveyance systems may be exempt from the hydromodification management requirements. Exemption from hydromodification management requirements is for projects that discharge directly to the exempt reach of the San Diego River, and those projects must meet the criteria for direct discharge defined in the City's Storm Water Standards Manual. Based on these requirements, any changes to runoff flow rates or volumes discharged directly to the San Diego River from future development within the CPU area are not expected to cause erosion. For any areas within the CPU area that do not meet the criteria for direct discharge to the San Diego River, the hydromodification management requirements would apply.

In addition, the proposed CPU includes policies to address storm water runoff to reduce the potential for flooding, as well as infrastructure design to reduce the impact of storm water runoff when it occurs.¹ By adhering to the requirements of the City's Stormwater Standards Manual augmented with the proposed CPU policies, future projects would not be expected to increase the rate or amount of surface runoff generated from the community in a manner which would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

Riverine Flooding

There are four major creeks or rivers within the CPU area that are potential sources of riverine flooding – the San Diego River and three major tributaries of the San Diego River: Alvarado Creek, Murphy Canyon Creek, and Murray Canyon Creek. These water bodies have been studied and documented in the FEMA Flood Insurance Study for San Diego County and Unincorporated Areas, dated May 16, 2012. The reaches of these creeks that are within the CPU area are shown on FIRMs published by FEMA. For a description of riverine flooding in Mission Valley from these water bodies, and copies of the relevant FIRMs, refer to Appendix I.

Riverine flooding impacts could occur from increases in the amount of runoff delivered to the creeks or river, causing an increase to the total flow in the creeks or river; from alterations to local drainage patterns and the manner in which local side drainage (water delivered from the local area as opposed to water already in the river from upstream areas) is discharged to the creeks or river; or from direct alterations to the creeks or river (e.g., construction of crossings and/or placement of fill within the course of the creeks or river). In general, the potential for such riverine flooding impacts is addressed through management of local surface runoff. As discussed above regarding local surface runoff, future development within the CPU area would be required to comply with the City's drainage regulations in the SDMC, which requires comparing and coordinating proposed design with existing structures and systems handling the same flows. By adhering to the requirements of the City's Drainage Design Manual and drainage regulations, future projects would not be expected to increase the rate or amount of surface runoff generated from the community in a manner which would result in riverine flooding, and impacts would be less than significant.

In general, the potential for riverine flooding impacts from direct alterations to the creeks or river is managed through the adoption of development regulations for SFHAs (i.e., areas mapped as 100-year flood hazard areas on federal FIRMs, where the NFIP's management regulations must be enforced) in the SDMC (Sections 143.0145 and 143.0146). These regulations address placement of fill, housing, and structures in areas mapped as SFHAs. A large portion of the CPU area is designated Zone X with a Provisionally Accredited Levee (PAL) note. Zone X is not a SFHA (Zone X is designated "Other Flood Areas"). Zone X is not typically subject to the regulations for the flood fringe. However, the PAL designation means that the levee system may lose its accreditation if FEMA does not receive proof of compliance with NFIP Code of Federal Regulations Section 65.10. This designation will remain in effect until the next revision to the FIRM.

¹ See Policy for Development FSR-1, Implementing Actions IA-90 through IA-94, and Design Guideline DG-65.

Within the floodway, the regulations set limitations on land uses, structures, and channelization or other alteration of the river, and require passage of the base flood. Permanent structures are not allowed. Development in floodways (e.g., road crossings) shall be offset by improvements or modifications to enable the passage of a base flood. Within the flood fringe, permanent structures and fill for permanent structures, roads, and other development are allowed if certain conditions defined in Sections 143.0145 and 143.0146 are met. By adhering to the requirements of the SDMC, future projects would not be expected to alter the course of a stream or river in a manner which would increase flooding on- or off-site or result in substantial erosion or siltation on- or off-site; place housing within a 100-year flood hazard area or place structures within a 100-year flood hazard area which would impede or redirect flood flows. Impacts would be less than significant.

Many of the development areas within the CPU area are within the SFHA of the San Diego River. The nature of the river flooding varies for different locations. Areas that are within SFHA Zone AE are subject to the City's regulations regarding building within SFHAs. However, there are additional areas that may be subject to flooding that are not designated as being within Zone AE. As noted above, there are several developed areas of Mission Valley that FEMA has identified on the FIRM panels as Zone X (shaded) with a note that they are protected by a PAL. PAL designation means that the levee was recognized on FEMA's previous FIRMs; however the regulatory requirement for levee accreditation has since changed, and the community or levee owner must provide certain documentation to certify that the levee continues to provide protection from the base flood, and that the levee meets minimum federal requirements. Based on the FIRM panels, the timeframes for levee accreditation have passed. Therefore, the levees in the CPU area cannot be considered to provide flood protection because they do not meet FEMA's standards. The following areas are affected:

- North of the San Diego River from SR-163 to just west of the westerly terminus of Station Village Lane, including properties along Hazard Center Drive, portion of Frazee Road south of Friars Road, Mission Center Court, Caminito Gabaldon, and Caminito De Pizza.
- South of the San Diego River from SR-163 to Qualcomm Way, including properties along Camino De La Reina, Camino Del Rio North, and Camino Del Este. This includes Mission Valley Mall.

The current FIRM in effect is the document the City enforces. Although not required, the proposed CPU contains policies recommending that development located behind the PAL consider designing to meet the City's regulations regarding buildings within SFHA Zone AE applicable "with out levee" flood zone as determined by the Hydrology and Water Quality Report Existing Conditions Analysis (Appendix I). Designing to Zone AE as encouraged in the applicable flood zone as determined by the Hydrology and Water Quality Report Existing Conditions Analysis per Policy FSR-3 would comply with the floodplain regulations and protection up to the 100-year flood, in the event the levees were removed on the next FIRM revision. Given the level of uncertainty regarding this potential flooding impact, impacts associated with potential future development located behind the PAL would be significant and unavoidable.

The proposed CPU identifies two new road crossings at the San Diego River including the proposed Riverwalk Street "J" and Fenton Parkway extension. Additionally, two new pedestrian crossings of the San Diego River are proposed near Hazard Center and Mission Valley Mall. New crossings have

the potential to increase flooding, erosion, or siltation by direct alteration of the river. In general, the design of each crossing must adhere to the City's drainage and floodplain regulations, which include the objectives that the potential for flooding, erosion, and/or siltation are addressed in the design. Riverwalk Street "J" and the Fenton Parkway extension are planned to be high-water crossings. This would provide new transportation routes available when existing low water crossings including Fashion Valley Road, Avenida Del Rio, Mission Center Road, Camino Del Este, and Qualcomm Road are closed to allow passage of flood water across the roadway. Adherence to the City's drainage and floodplain regulations would ensure that flooding impacts associated with introduction of Riverwalk Street "J" and the Fenton Parkway extension would be less than significant.

Dam Failure

Buildout of the proposed CPU would result in new housing and other development within the inundation pathways of these dams. However, dam failure is considered a low-probability event. All of the dams are inspected annually by the California Division of Safety of Dams (DSOD) to ensure they are in good operating condition. With continued evaluation of dam stability, continued compliance with State regulations, and a proposed CPU Implementing Action policy to support ongoing dam maintenance,² risk associated with flooding due to dam failure is considered minimal, and impacts would be less than significant.

Other Flood Hazards – Seiche, Tsunami, Mudflow

Seiches pose a minimal threat in the CPU area because there are no large confined bodies of water. The most serious consequence of a seiche would be the overtopping and failure of a dam; for example, if a seiche occurred in a lake or reservoir upstream of the community. However, as discussed above, dam failure is considered a low probability event. Review of the Tsunami Inundation Map for Emergency Planning La Jolla Quadrangle, prepared by the California Emergency Management Agency, the California Geological Survey, and the University of Southern California, dated June 1, 2009 shows that the CPU area is not located within a tsunami inundation area. Impacts related to seiches and tsunamis would be less than significant.

Portions of the CPU area are bounded by steep canyon walls to the north and/or south. Consequently, there is a potential for mud and debris from canyon walls to impact developed areas, primarily following a wildfire event. This could present a localized threat to development immediately below the canyon walls. However, implementation of design measures that allow for conveyance of mud and debris where concentrated drainage paths from the canyon walls drain to development areas would ensure that impacts would be less than significant.

² See Implementing Action IA-904.

Mitigation Measures

Impacts related to future development behind located behind the PAL would be significant and unavoidable, and there are no mitigation measures available. All other impacts in this area would be less than significant; therefore, no mitigation measures are required.

Impact 4.7-2: Water Quality

Would the proposed CPU result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

The majority of the existing development within Mission Valley was established prior to the adoption of storm water regulations requiring the protection and treatment of storm water runoff. Therefore, there are few existing BMPs that protect storm water runoff quality or existing BMPs that are not consistent with current standards. Future development projects that could occur under the proposed CPU would have the potential to change pollutant discharges due to site modifications within previously developed land, such as changes in overall permeable/impermeable surfaces. However, as future development occurs, current NPDES permit requirements would require the retention and/or treatment of storm water through the implementation of BMPs. Future development would be required to demonstrate how pollutants such as various trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids would be treated to prevent discharge into receiving waters. As redevelopment occurs, the storm water facilities associated with existing development in the CPU area will be upgraded to comply with current storm water regulations. Thus, future development and redevelopment would be subject to current, more stringent requirements, which would ensure water quality would not significantly degrade below current water quality levels.

Under current storm water regulations in the City, all projects are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new developments include site design, source control, and treatment control practices, many of which overlap with LID practices. Storm water BMPs would reduce the amount of pollutants transported from a future development project to receiving waters. In addition, the proposed CPU includes policies that would further ensure reductions in the impact that runoff could have on water quality, by requiring BMPs and storm water treatment and subsequent projects to be subject to the storm water regulations in place at the time projects are implemented.³ Thus, impacts to water quality would be less than significant.

Mitigation Measures

None required.

³ See Policies for Development FSR-1 and FSR-2.

Impact 4.7-3: Groundwater

Would the proposed CPU deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?

Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit, in which the CPU area is located, has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural, industrial service, and industrial process supply. As previously detailed, the San Diego RWQCB implements the Regional MS4 Permit. This permit implements a watershed-based approach to storm water management with an increased reliance on LID and applies to new development in the San Diego region, including Mission Valley. The City's Storm Water Standards Manual establishes guidance on the required water quality improvements for new development and redevelopment projects, including required construction BMPs. The requirements are structured to protect both surface water beneficial uses and groundwater beneficial uses of downstream receiving waters. Additionally, the proposed CPU does not include or require the extraction of groundwater for purposes of supplying future projects within the CPU area and would therefore not deplete groundwater supplies. Thus, impacts to groundwater supply and quality would be less than significant.

Mitigation Measures

None required.

4.8 Land Use

This section analyzes the potential significant impacts to land use due to the implementation of the proposed CPU. Issues addressed include the potential conflicts with the environmental goals of the City's General Plan and compatibility with the adopted Multiple Species Conservation Program (MSCP) Subarea Plan, the City's Climate Action Plan (CAP), the City's Municipal Code (SDMC), relevant Specific Plans, the City's Vernal Pool Habitat Conservation Plan (VPHCP), the San Diego River Park Master Plan, the San Diego Association of Governments' (SANDAG) Regional Comprehensive Plan (RCP), the Airport Land Use Compatibility Plans (ALUCPs) for Montgomery Field and San Diego International Airport (SDIA), the City's Historical Resources Regulations, and the City's Environmentally Sensitive Lands (ESL) Regulations. Information on existing land use conditions is drawn from the 2018 San Diego County Assessor's data and SANDAG data.

4.8.1 Environmental Setting

4.8.1.1 PHYSICAL SETTING

Existing Land Use Conditions

Existing land uses described below were identified using data from the City and County, including 2018 Assessor's data as well as aerial photography. There are approximately 2,410 acres in the CPU area, excluding utilities and rights-of-way. Among the land uses existing in 2018, commercial uses are the most prominent, followed by recreation and open space uses, residential uses, public and community facilities, industrial uses, and vacant and undeveloped land. Figure 4.8-1 depicts the location of existing land uses. Table 4.8-1 summarizes the proportion of land area occupied by different uses in the CPU area as of 2018.

Commercial

The most prominent land use in the CPU area is commercial, which constitutes 814 acres or 25 percent of the CPU area. Within this general category are office, retail, general commercial, hotel, recreation commercial, service commercial, and auto-related commercial uses. Retail and general commercial uses largely fall in the region between Friars Road and Interstate (I-) 8, and hotel uses are commonly seen along Hotel Circle Drive west of State Route 163 (SR-163). Office uses are scattered throughout the CPU area.

Recreation and Open Space

Recreation and open space is the second most prominent land use category in the CPU area, comprising 655 acres or 20 percent of Mission Valley. Much of the recreation and open space land surrounds the San Diego River and lies within the 100-year floodway and the Multi-Habitat Planning Area (MHPA). The Riverwalk Golf Course, located at the western portion of Mission Valley and classified as a recreational land use, covers 209 acres or 6 percent of the CPU area.

Residential

Residential uses are scattered throughout the CPU area and are generally located north of I-8 and east of SR-163. Residential uses consist almost entirely of multi-family development with some mixed-use development at Rio Vista that is primarily residential. In total, residential uses cover 473 acres or 15 percent of the CPU area.

Public and Community Facilities

Public and community facilities occupy 290 acres or 9 percent of the CPU area, of which 176 acres are the Stadium and its surrounding parking lot.

Industrial

As of 2018, there are about 64 acres of industrial land. Most of these uses are concentrated in a business park setting along Mission Valley Drive and Metropolitan Drive.

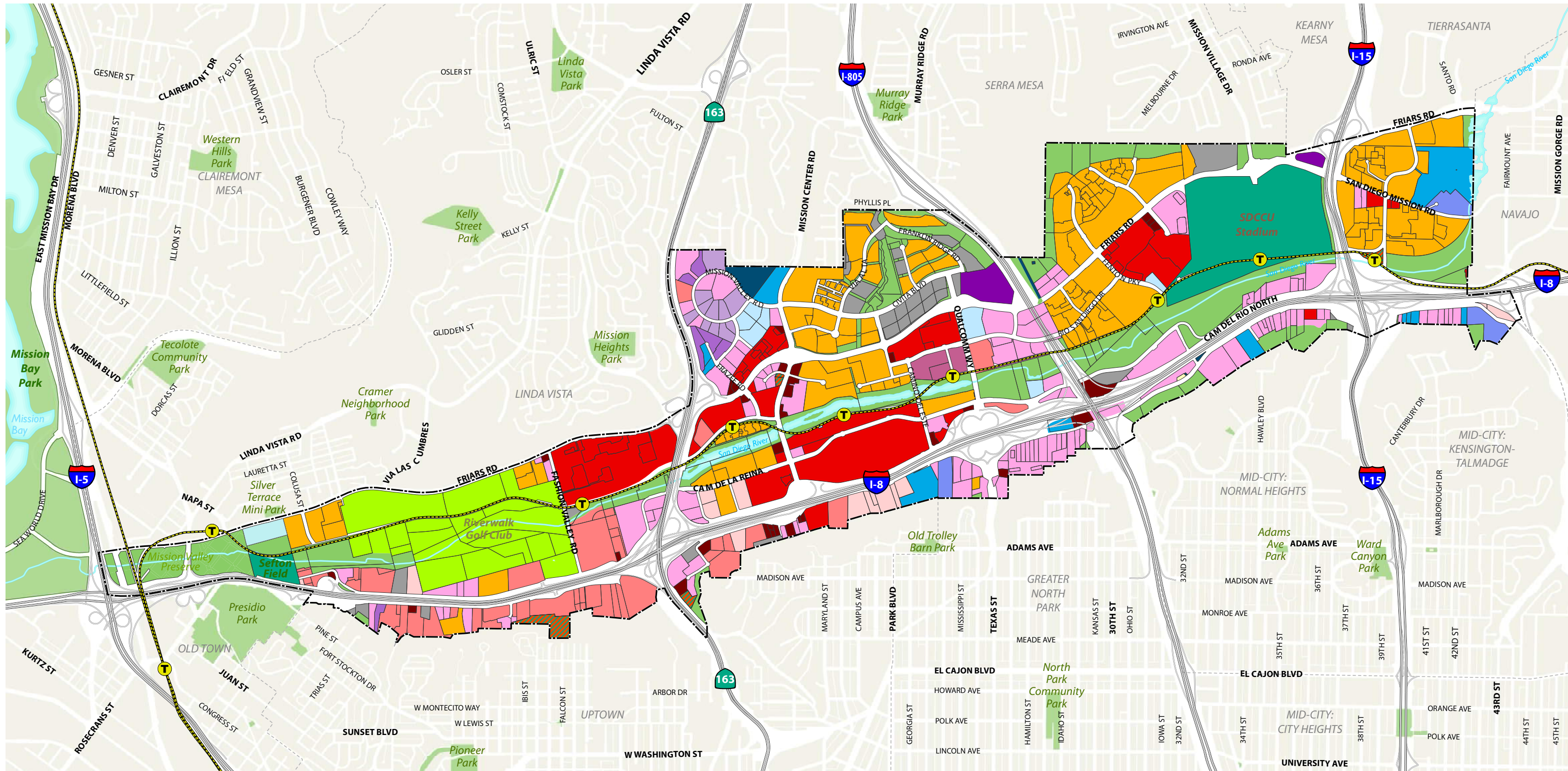
Vacant and Undeveloped Land

As of 2018, there are about 142 acres of vacant land. The vast majority of vacant land is in the Quarry Falls Specific Plan area and is currently being developed as part of the Civita project.

Transportation and Utilities

Transportation and utilities occupy 806 acres or 25 percent of the CPU area. Of the 806 acres, 12 acres are a San Diego Gas and Electric substation on Mission Valley Road. 794 acres constitute roads and transportation rights-of-way.

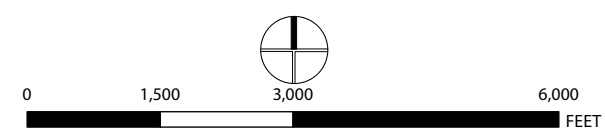
Figure 4.8-1: Existing Land Use



Trolley Stops	Single-Family Residential	Retail/General Commercial	General Industrial/Warehousing	Sports/Recreational Facilities	Lakes/Ponds/Bays
Light Rail	Multifamily Residential	Service Commercial	Heavy Industrial	Golf Course	Mission Valley Community Plan Boundary
Freeways	Mixed Use Residential	Recreation Commercial	Educational/Institutional	Parks/Open Space/Undevelopable Natural Areas	Community Planning Areas
Ramps	Auto Commercial	Office	Religious Facilities	Utilities	
Streams/Creeks	Hotel/Motel/Lodging Commercial	Business Park/Light Industrial	Public/Government	Vacant/Undeveloped Land	

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Table 4.8-1: Existing Land Uses in Mission Valley

<i>Community Plan Land Use</i>	<i>Acres</i>	<i>Percent</i>
Residential	473	15%
Single-Family	<5	0%
Multi-Family	457	14%
Mixed Use	15	0%
Commercial	814	25%
Auto Commercial	37	1%
Hotel/Motel/Lodging Commercial	164	5%
Retail/General Commercial	278	9%
Service Commercial	29	1%
Recreation Commercial	22	1%
Office	284	9%
Industrial	64	2%
Business Park/Light Industrial	25	1%
Heavy Industrial	17	1%
General Industrial/Warehousing	21	1%
Public and Community Facilities	290	9%
Public/Government	24	1%
Educational/Institutional	65	2%
Religious Facilities	25	1%
Sports/Recreational Facilities	176	5%
Recreation and Open Space	655	20%
Open Space/Undevelopable Natural Areas	446	14%
Golf Course	209	6%
Vacant/Undeveloped	116	4%
Transportation and Utilities	806	25%
Utilities	12	0%
Roads ROW/Railroad ROW/Other Transportation	794	25%
Total	3,216	100%

Note: Numbers may not sum due to rounding. Attached housing units are counted as multi-family housing.

Source: 2018 San Diego County Assessor's Data, SANGIS/SANDAG Regional GIS Data Warehouse, 2018; Landuse Current, SANGIS/SANDAG, 2017 (www.sangis.org); Dyett & Bhatia, 2018.

4.8.1.2 REGULATORY SETTING

State Regulations

General Plan Consistency with the Airport Land Use Compatibility Plans

Public Utilities Code Section 21675 requires each airport land use commission (ALUC) to formulate an airport land use compatibility plan (ALUCP). California Government Code Section 65302.3 further requires that general plans and any applicable specific plan be consistent with ALUCPs. In addition, general plans and applicable specific plans must be amended to reflect amendments to the ALUCP. The ALUCPs for SDIA and Montgomery Field are discussed further below.

Sustainable Communities and Climate Protection Act of 2008

The Sustainable Communities and Climate Protection Act of 2008 (Chapter 728, Statutes of 2008), otherwise known as Senate Bill (SB) 375, requires the integration of land use, housing, and transportation planning to achieve regional greenhouse gas (GHG) emission reductions, adopted by the California Air Resources Board. SB 375 requires Metropolitan Planning Organizations (MPOs) to develop a Sustainable Communities Strategy (SCS)—a new element of the regional transportation plan (RTP)—to plan for achieving these GHG reduction targets. The SCS must demonstrate the attainment of the regional GHG emissions reduction targets while accommodating the full projected population of the region.

Local Regulations

San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan, adopted in October 2015 by SANDAG, is a planning document that combines two previously adopted documents: The Regional Comprehensive Plan (RCP) and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP (adopted in 2004) was a long-range planning document that established a planning framework and implementation actions that increased the region's sustainability and encouraged "smart growth while preserving natural resources and limiting urban sprawl" (SANDAG, 2004). The RTP/SCS (adopted in 2011) was a long-range advisory plan for transit, rail, and bus services; express or managed lanes; highways; local streets; bicycling; and walking. The vision presented in the RTP/SCS was for a compact urban core where more people reside and use fewer resources, which reflects a transportation system that supports a robust economy and a healthy and safe environment, reducing GHG emissions as required by the State while providing a higher quality of life for San Diego County residents (SANDAG, 2011). The Regional Plan combined the core principles of both documents and added additional strategies to "provide innovative mobility choices and planning to support a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all" (SANDAG, 2015).

Airport Land Use Compatibility Plans

The San Diego County Regional Airport Authority (Airport Authority) serves as the ALUC for San Diego County. The ALUC is responsible for adopting ALUCPs for 16 public-use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area (AIA) for each airport.

The ALUC has no jurisdiction over the operation of airports or over existing land uses, regardless of whether or not such uses are incompatible with airport activities. Once ALUCPs have been adopted by the ALUC, local agencies with land located within the AIA boundary for any of the airports must, by law, amend their planning documents to conform to the applicable ALUCP. However, if a local agency makes special findings in accordance with State law, it can override the ALUCPs with a two-thirds vote. Since the ALUC does not have land use authority, the City implements the compatibility plans through land use plans, development regulations, and zoning regulations. In addition, development within the ALUC Overlay Zone is required to comply with SDMC Section 132.1550.

The CPU area is located in the AIAs of SDIA and Montgomery-Gibbs Executive Airport, as shown on Figure 4.5-2 in Section 4.5: Hazards and Hazardous Materials.

San Diego International Airport ALUCP

The SDIA ALUCP was adopted in 2014 and contains policies and standards related to airspace protection and noise, safety, and overflight compatibility. The SDIA AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60-decibel (dB) Community Noise Equivalent Level (CNEL) noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSS). All policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

Portions of the CPU area that are in the SDIA AIA are all located in Review Area 2, where ALUC review is required ~~in accordance with the SDIA ALUCP, for land use plans and regulations proposing increases in height limits and for land use projects that have received from the Federal Aviation Administration (FAA) a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements; and/or would create any of the following hazards: glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractants.~~

The objective of the airspace protection policies and standards is to ensure new development around SDIA does not interfere with safe and efficient air navigation. Policies include requirements limiting construction or objects exceeding 200 feet in height; sources of glare or lighting systems that can distract pilots; sources of dust, vapor, smoke, and thermal plumes; electromagnetic

interference; and bird attractants. Overflight compatibility policies require an overflight notification agreement to be recorded for any new dwelling unit within the overflight area.

Montgomery Field ALUCP

The Montgomery Field ALUCP was adopted by the ALUC in 2010. The Montgomery-Gibbs AIA is divided into two review areas. Review Area 1 consists of locations where noise and safety concerns may necessitate limitations on the types of land use actions. Specifically, Review Area 1 encompasses locations exposed to aircraft noise levels of 60 dB CNEL or greater together with all of the safety zones. Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and overflight notification areas. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The recordation of overflight notification documents is also required in locations within Review Area 2. Portions of the CPU area within the Montgomery-Gibbs AIA are all within Review Area 2. The City implements the adopted Montgomery Field ALUCP through the Airport Land Use Compatibility Overlay Zone. Development within the Airport Land Use Compatibility Overlay Zone is required to obtain a consistency determination from the ALUC for certain types of development as described in the current ALUCP and SDMC Section 132.1550.

~~Within Review Area 2, only the following land use actions require ALUC review:~~

- ~~(i) Any object which has received a final notice of determination from the FAA that the project will constitute a hazard or obstruction to air navigation, to the extent applicable.~~
- ~~(ii) Any proposed object in an area of terrain penetration to airspace surfaces which has a height greater than 35 feet above ground level.~~
- ~~(iii) Any project having the potential to create electrical or visual hazards to aircraft in flight, including: electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright lights (including laser lights) in the eyes of pilots or aircraft using the Airport; certain colors of neon lights—especially red and white—that can interfere with night vision goggles; and impaired visibility near the Airport. The local agency should coordinate with the airport operator in making this determination.~~
- ~~(iv) Any project having the potential to cause an increase in the attraction of birds or other wildlife that can be hazardous to aircraft operations in the vicinity of the Airport.~~

City of San Diego General Plan

A comprehensive update of the General Plan was adopted in 2008, incorporating the City of Villages strategy, which in turn was developed and adopted as part of the Strategic Framework Element in 2002. The Strategic Framework Element represented the City's new approach for shaping how the City will grow while attempting to preserve the character of its communities and its most treasured natural resources and amenities. It was developed to provide the overall structure to guide the General Plan update and future CPUs and amendments, as well as the implementation of an action plan.

Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses, mirroring regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

The General Plan includes 10 elements intended to provide guidance for future development. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic Preservation Element; and (10) Housing Element. The Housing Element, which must be updated every 8 years under state law, was last updated in 2013 and is provided under separate cover due to the need for more frequent updates. It is required to be consistent with the General Plan goals and City of Villages strategy.

Land Use and Community Planning Element

The Land Use and Community Planning Element provides the framework for developing Community Plans. Policies call for Community Plans to identify appropriate land uses to meet the goals set by the General Plan and the City of Villages strategy. The policies also indicate that mixed-use areas, villages, and community-specific policies are developed with public input and involvement. The Land Use and Community Planning Element contains five goals related to community planning. These goals are intended to ensure that Community Plans:

- Are clearly established as essential components of the General Plan to provide focus upon community-specific issues;
- Are structurally consistent yet diverse in their presentation and refinement of citywide policies to address specific community goals;
- Maintain or increase planned density of residential land uses in appropriate locations;
- Are accompanied by updated public facilities financing plans; and
- Are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.

Future public and private projects in Community Plan areas are evaluated for consistency with policies in Community Plans.

Mobility Element

The Mobility Element contains policies that seek to promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system.

Urban Design Element

The Urban Design Element of the General Plan emphasizes the creation of transit-focused, walkable village centers; the provision of high-quality public spaces and civic architecture; and the enhancement of the visual quality of office and industrial development.

Economic Prosperity Element

The Economic Prosperity Element contains policies intended to ensure that the economy grows in ways that strengthens San Diego industries and creates jobs with self-sufficient wages, increases average income, and stimulates economic investment in the community.

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element is directed at providing adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. Policies in the Public Facilities, Services, and Safety Element also apply to fire-rescue, police, wastewater collection and treatment, storm water infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, and disaster preparedness.

Recreation Element

The goals and policies of the Recreation Element build on the city's natural environment and resources and existing recreational facilities and services to help achieve an equitable balance of recreational resources and to adapt to future recreation needs. Recreation Element policies address the challenge of meeting the public's park and recreational needs; the inequitable distribution of parks citywide; and the need to achieve a sustainable, accessible, and diverse park and recreation system. The Recreation Element also addresses alternative methods, or "equivalencies," to achieve citywide equity where constraints make meeting City guidelines for population-based parks infeasible, or to satisfy community-specific needs and demands.

Conservation Element

Conservation Element goals and policies guide the conservation of resources that are fundamental components of San Diego's environment, that help define the city's identity, and that are relied upon for continued economic prosperity. Resources addressed in the element include water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy.

Noise Element

The focus of the Noise Element is to minimize excessive noise effects and improve the quality of life of people working and living in the city. The Noise Element identifies goals and related policies with regards to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise.

Historic Preservation Element

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources.

Housing Element

The separately adopted 2013–2020 Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group.

Climate Action Plan

The City's CAP was adopted in December 2015. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a Business as Usual projection for emissions at 2020 and 2035, State targets, and emissions reductions with implementation of the CAP. To achieve its proportional share of the State reduction targets for 2020 and 2050, the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and by 50 percent by 2035. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency.

Specific Plans

Six adopted Specific Plans within the CPU area provide greater specificity for future development and public improvements for several sites within Mission Valley. These Specific Plans are summarized below.

First San Diego River Improvement Project Specific Plan (1982)

The First San Diego River Improvement Project Specific Plan (FSDRIP) area consists of approximately 261 acres bounded by SR-163 on the west, Camino de la Reina and Camino del Rio North on the south, and Friars Road on the north. The eastern boundary is located approximately 700 feet east of I-805.

The FSDRIP contains two key elements:

- Realignment of the San Diego River to create a flood control channel between I-805 and SR-163 to alleviate flooding, open up more land for development, and biologically restore the San Diego River wetlands.
- Four major private developments—Mission Valley West/MBM, Hazard Center, Park in the Valley, and Rio Vista West—adjacent to the river and its floodway. These developments provide for a total of 1.3 million square feet of office space; 815,000 square feet of retail; 875 hotel rooms; and up to 2,535 residential units.

A majority of FSDRIP is built out, but there is still development potential at Park in the Valley near the Mission Valley Center trolley station. The Specific Plan assumed that under the existing Community Plan, Park in the Valley would build out to 500,000 square feet of office; 300,000 square

feet of retail; and a hotel component of 300 rooms. As of the base year (2012), Park in the Valley has built out approximately 280,000 square feet of retail without the office or hotel.

Levi-Cushman/Riverwalk Specific Plan (1987)

The Levi-Cushman/Riverwalk Specific Plan proposes mixed-use development on approximately 200 acres west of Fashion Valley Road, south of Friars Road, and north of I-8 and Hotel Circle North. The site is currently used as a 27-hole golf course.

The Specific Plan proposes a total of 135 acres of future development. North of the San Diego River, the plan features predominantly residential development, with the balance designated for commercial, office, hotel, and community uses. South of the river, the plan proposes primarily office and hotel uses. In addition, the plan proposes the construction of a 12-acre island, which would be the focus of public spaces, office, and retail. The plan also proposes the creation of a 26-foot deep, soft-bottomed, natural-appearing flood control channel in the river; a 25-foot-wide buffer located on each side of the river throughout the project; and habitat areas along the edges and banks of the river channel. An amendment to the Specific Plan was initiated in 2014 to, among other things, revise the plan's land use mix.

Mission Valley Heights Specific Plan (1987)

The Mission Valley Heights Specific Plan is bounded on the east by Mission Center Road, on the south by Friars Road, on the west by SR-163, and on the north by existing residential development at the top of the mesa. The Specific Plan proposes approximately 90 acres of medium- and low-density office and industrial business park development north of Friars Road in an area formerly used for sand and gravel extraction. The plan also proposes the development of approximately 150,000 square feet of retail space, developed as a large community commercial center anchored by a large supermarket, on a 15-acre lot fronting Friars Road. This plan has been fully developed.

Atlas Specific Plan (1988)

The Atlas Specific Plan establishes land uses and intensities for seven non-contiguous sites totaling approximately 86 acres, all of which were previously owned by Atlas Hotels, Inc. The Specific Plan proposes to expand development on three of the seven sites—Town and Country, Mission Valley Inn, and Hanalei Hotel (now Crowne Plaza)—and develop office uses on the vacant Hanalei Tower site. The Specific Plan also has a river improvement element, which includes floodway improvements, a buffer along the San Diego River corridor, and public access.

The Specific Plan has not been implemented, and different owners now own the subject properties. An amendment was approved to redesignate the land use of the approximately 40-acre Town and Country property from Commercial Recreation to Multi-Use. An amendment to the Specific Plan was approved to carry out the mixed-use Legacy Center International Project, to be located at 875 Hotel Circle South.

Mission City Specific Plan (1998)

The Mission City Specific Plan includes a range of medium-low and medium density residential, together with commercial and office land uses, on a 225-acre site located between I-15 and I-805 and north of I-8. The plan provides for medium and low-medium density residential development to the north and a mix of uses to the south of Friars Road. The Specific Plan also provides for an expanded circulation network, including a grade-separated pedestrian crossing of Friars Road and a pedestrian way across the large mixed-use site south of Friars Road (now Fenton Marketplace). The Specific Plan has been developed.

Quarry Fall Specific Plan (2008)

The Quarry Falls Specific Plan encompasses an approximately 225-acre former mining site bordered on the south by Friars Road, on the north by an undeveloped area and the community of Serra Mesa, on the east by I-805, and on the west by Mission Center Road. In what is now known as the Civita Project, the Specific Plan calls for the development of six districts linked by an open space system, stepping down from Serra Mesa to the valley floor. The Specific Plan provides for a mix of housing types to be developed, as well as a school, a large park, and a mixed-use district along Friars Road. Currently, there is either public infrastructure or vertical development in all but one of Civita's districts.

San Diego River Park Master Plan

The San Diego River Park Master Plan, adopted by the City in 2013, is a policy document that communicates a common vision, principles, and recommendations to guide land use decisions within the River Corridor and River Influence Areas along the San Diego River. Thus, the Master Plan informs development along the river in Mission Valley. Notably, the Master Plan envisions the creation of a distinct, identifiable park along the river. This vision for the river is supported by five main principles (City of San Diego, 2013):

- Restore and maintain a healthy river system;
- Unify fragmented lands and habitats;
- Create a connected continuum, with a sequence of unique places and experiences;
- Reveal the river valley history; and
- Reorient development toward the river to create value and opportunities for people to embrace the river.

Specific recommendations for how to achieve this vision are provided within the Master Plan. They include providing interpretive signage at key locations, creating new pedestrian and bicycle connections, and pursuing opportunities to address the hydrology of the river. The Master Plan also provides site-specific recommendations for the Riverwalk Golf Course site to guide any future amendment of the Levi-Cushman Specific Plan, as well as recommendations for any redevelopment of the Stadium site.

City of San Diego Municipal Code

The SDMC implements the policies put forth in the General Plan and the Mission Valley Community Plan through detailed development regulations. Chapters 11 through 15 of the SDMC are referred to as the Land Development Code (LDC) as they regulate the form that development can take and the land uses that are permitted in the City.

Community Plan Implementation Overlay Zone (CPIOZ)

Per Chapter 13, Article 2, Division 14 of the SDMC, the purpose of the CPIOZ is to provide supplemental development regulations that are tailored to specific sites within the Community Plan areas of the city. CPIOZs are intended to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted for these specific areas of the community.

CPIOZs are characterized as either “Type A” or “Type B,” depending upon whether or not the applicable Community Plans contain specific development standards and criteria or policies and guidelines, respectively, to address development proposals within an identified area. The CPIOZ Type A is ministerial, and no discretionary permit is required if the proposed development complies with the development standards or criteria. The CPIOZ Type B means that a discretionary permit is required for all new development. Developments approved under a CPIOZ Type B discretionary permit are required to meet the regulations of the underlying zone and the supplemental development regulations.

Environmentally Sensitive Lands (ESL) Regulations

The LDC also details the City’s ESL Regulations. The purpose of the ESL Regulations is to protect, preserve, and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands (SDMC Chapter 14, Article 1, Division 1; City of San Diego, 2000). These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners. Environmentally sensitive lands include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas (SDMC Chapter 14, Article 3, Division 1). Development on a site containing environmentally sensitive lands requires a Site Development Permit in accordance with Section 126.0502 of the SDMC.

Historic Resource Regulations

The purpose of the City's Historical Resources Regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties/tribal cultural resources (SDMC Chapter 14, Article 3, Division 2). These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners. The Historical Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual, as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a Site Development Permit in accordance with Section 126.0502 of the SDMC.

Affordable Housing Regulations

SDMC Chapter 14, Article 3, Division 7 is titled the Affordable Housing Regulations. The purpose of these regulations is to provide incentives for development that provides housing for very low income, low income, moderate income, or senior households; transitional foster youth; disabled veterans; or homeless persons. Additionally, the purpose is to specify how compliance with California Government Code Section 65915 (State Density Bonus Law) will be implemented, as required by California Government Code Section 65915(a)(1). These regulations are intended to materially assist in providing adequate and affordable housing for all economic segments of the community and to provide a balance of housing opportunities throughout the City. It is intended that the affordable housing density bonus and any additional development incentive be available for use in all residential development of five or more units, using criteria and standards provided in the General Plan as part of the proposed CPU. All requests are required to be processed by the City of San Diego and implemented by the San Diego Housing Commission.

Planned District Ordinances

A planned district is any legally described geographic area: (1) which has historical significance or serves as an established neighborhood or community; or (2) which is, at the time of adoption, developing or substantially undeveloped and for which a program of phased growth is desirable; and (3) which has been designated a planned district by the City Council. The district shall be wholly within the boundaries of a precise plan or coterminous with the boundaries of a Community Plan adopted by the City Council and on file in the office of the City Clerk. The plan must be detailed enough to permit the evaluation of proposed development controls for the district.

Most of the CPU area is governed by the Mission Valley Planned District Ordinance (PDO) (SDMC Chapter 15, Article 14, Divisions 1-4), which implements the existing Mission Valley Community Plan through the use of base commercial, industrial, multiple use, and residential districts that provide development standards; overlay districts that regulate development intensity across Mission Valley; overlay districts that regulate the permitted form and type of development in the

hillsides and adjacent to the river to ensure these areas will be respected and preserved; and special regulations that address needs unique to Mission Valley, such as parking and circulation, design requirements, and landscaping (See Figure 3.3-2).

The San Diego River Subdistrict, a subdistrict within the Mission Valley PDO (SDMC Chapter 15, Article 14, Division 3), includes additional regulations for development along the San Diego River and identifies two areas: the River Corridor Area, including the River, its floodway, and 35 feet on either side; and the River Influence Area, extending 200 feet beyond on both sides. Development in the River Corridor Area is limited generally to the creation of a river pathway and passive recreation areas, where these would not conflict with habitat conservation in the MHPA. In the River Influence Area, land use is established by underlying zones, but the lot coverage, building height, and massing are limited, with allowed building height rising with increasing distance from the river.

The area within the Mission Valley PDO's Hillside Conservation, Design, and Height Limitation Subdistrict covers 843 acres, or 35 percent of the CPU area, including all land north of Friars Road on the northern slope of the valley and all land south of I-8 on the southern slope. The Subdistrict regulates building height, steep slope preservation (gradient 25 percent or greater), signage, and grading limit based on site location and slope.

Portions of the CPU area ~~may be~~ are zoned according to the Mission Valley PDO base zones or citywide base zoning districts. In addition, Chapter 15, Article 4, Division 3 of the SDMC describes planning regulations for the Mission Valley Development Intensity Overlay District. Per the SDMC, the Development Intensity Overlay District covers the entire Mission Valley Community Plan area. Development intensity in this district is limited by the number of average daily trips (ADT) generated by existing and proposed land uses. Development intensity factors, as listed in Table 1514-03B of the SDMC, are used to calculate the ADT generated by any given land use.

Airport Land Use Compatibility Overlay Zone

The City uses the Airport Land Use Compatibility Overlay Zone (SDMC Chapter 13, Article 2, Division 15) to implement the adopted Montgomery Field ALUCP to properties within the city that are located in its AIAs. Pursuant to SDMC Section 132.1505, properties located within Review Area 2 are required to comply with the airspace protection compatibility requirements described in SDMC Section 132.1520. Properties located within the Montgomery Field AIAs are also required to comply with requirements to dedicate aviation easements in accordance with SDMC Section 132.1530.

Per SDMC Section 132.1550, prior to development within the Airport Land Use Compatibility Overlay Zone, an applicant shall obtain a consistency determination from the ALUC for the following types of development:

- (i) Development in the Clear Zone or Safety Zone 1;
- (ii) Development that would deviate from this Division;
- (iii) Development that has been determined to be a hazard by the FAA;

- (iv) Development that includes a rezone or approval of a land use plan;
- (v) Development that would include aviation uses, non-aviation uses located on airport property (public use airport only), or approval of an airport master plan; and
- (vi) Development of a power plant or electrical substation in accordance with the regulations for safety compatibility of Energy Generation and Distribution Facilities in Section 132.1515.

Consistency determinations made by the ALUC may be overruled in accordance with SDMC Section 132.1555.

Multiple Species Conservation Program (MSCP)

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and State Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City signed an Implementing Agreement with The United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). This serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The Implementing Agreement became effective on July 17, 1997 and allows the City to issue Incidental Take Permits to address impacts to listed endangered or threatened species under the provisions of the MSCP. Applicable State and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

For more detail on the MSCP, see Section 4.2: Biological Resources.

Multi-Habitat Planning Area (MHPA)

The primary goal of the City's MSCP Subarea Plan is to conserve viable populations of sensitive species and regional biodiversity while allowing for reasonable economic growth. To carry out this goal, the City's MSCP Subarea Plan establishes an area known as the MHPA from which the permanent MSCP preserve will be assembled. Approximately 90 percent of the MHPA lands (52,727 acres) within the City's subarea will be preserved. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA is defined by a set of "hard-line" maps, with limited development permitted within it based on the development area allowance of the OR-1-2 zone (open space residential zone) (City of San Diego 1997).

The MHPA consists of public and privately-owned lands, much of which has been conserved. Publicly-owned lands may be owned by the City or other agencies. MHPA lands may also have open space, building restrictive, covenant, or conservation easements over them, or be subject to other restrictive uses based on current or prior City regulatory requirements which have protected the overall quality of the biologically sensitive resources.

In most cases, lands wholly within the MHPA are allowed up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be requested. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.4.2 of the Final MSCP Plan (City of San Diego 1998). All MHPA boundary line adjustments require approval by the USFWS, the CDFW, and approval from a City discretionary hearing body.

MSCP Management Policies and Directives

The MSCP includes management priorities as part of its implementation requirements. Those actions identified as Priority 1 Directives protect the resources in the MHPA, including management actions that are necessary to ensure that the Covered Species are adequately protected. The actions identified as Priority 2 are directives other than those required for covered species status and other long-term items that may be implemented during the life of the Subarea Plan as funding becomes available. Relevant sections include the following:

SECTION 1.4.2: GENERAL PLANNING POLICIES AND DESIGN GUIDELINES

MSCP Section 1.4.2 identifies policies and guidelines to be used in the review and approval of development projects within or adjacent to the MHPA for the following areas:

- Land uses allowed within the MHPA;
- Fencing, lighting, and signage;
- Roads and utilities construction and maintenance policies;
- Materials storage;
- Mining, extraction, and processing facilities; and
- Flood control.

SECTION 1.4.3: MHPA LAND USE ADJACENCY GUIDELINES

MSCP Section 1.4.3 was developed to manage land uses adjacent to the MHPA, as well as to address the integrity of the MHPA by alleviating indirect impacts to the MHPA. The MHPA Land Use Adjacency Guidelines are incorporated into applicable permit conditions during the development review phase of a proposed project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/ development. New development adjacent to the MHPA would be required to address means of reducing these indirect impacts through implementation of the MHPA Land Use Adjacency Guidelines.

SECTION 1.5.2: GENERAL MANAGEMENT DIRECTIVES

MSCP Section 1.5.2 addresses directives that apply to all areas of the MSCP Subarea Plan, including:

- Mitigation;
- Restorations;
- Public access, trails, and recreation;
- Litter/trash and material storage;
- Adjacency management issues; and
- Invasive exotics control and removal.

SECTION 1.2.3 AND 1.5.7: SPECIFIC MANAGEMENT POLICIES AND DIRECTIVES FOR URBAN HABITAT LANDS

MSCP Section 1.5.7 provides specific management policies and directives for the urban habitats defined in MSCP Section 1.2.3. Urban areas in the city include existing designated open space such as Mission Bay, Tecolote Canyon, Marian Bear Memorial Park, Rose Canyon, the San Diego River, the southern slopes along Mission Valley, Carroll and Rattlesnake Canyons, Florida Canyon, Chollas Creek and a variety of smaller canyon systems dispersed throughout the more urban areas of the city.

The major issues that require consideration for management in the urban areas include the following, in order of priority, as excerpted from Section 1.5.7 of the City's MSCP Subarea Plan (1997):

- Intense land uses and activities adjacent to and in covered species habitat;
- Dumping, litter, and vandalism;
- Itinerant living quarters;
- Utility, facility, and road repair, construction, and maintenance activities;
- Exotic (non-native) and invasive plants and animals; and
- Urban runoff and water quality.

Additionally, MHPA Guideline B15 states that native vegetation shall be restored as a condition of future development proposals.

Vernal Pool Habitat Conservation Plan

The City adopted the VPHCP in 2018 to implement a comprehensive planning approach to vernal pool species and habitat preservation. The intent is to provide an effective framework to protect, enhance, and restore vernal pool resources within the City's jurisdiction while improving and streamlining the environmental permitting process for impacts to threatened and endangered vernal pool species. The VPHCP provides coverage for threatened and endangered vernal pool species that as of 2018 do not have federal coverage under the City's MSCP Subarea Plan. The VPHCP is compatible with the MSCP and expands upon the City's existing MHPA to conserve additional lands with vernal pool resources. The VPHCP-protected species include the following

seven threatened and endangered species: Otay Mesa mint (*Pogogyne nudiuscula*); San Diego Mesa mint (*Pogogyne abramsii*); spreading navarretia (*Navarretia fossalis*); San Diego button-celery (*Eryngium aristulatum* var. *parishii*); California orcutt grass (*Orcuttia californica*); Riverside fairy shrimp (*Streptocephalus woottoni*); San Diego fairy shrimp (*Branchinecta sandiegonensis*).

Within the CPU boundary, the area adjacent to the San Diego River is included as “Baseline Conservation” in the VPHCP. There are no additional locations with vernal pools resources identified in the CPU area.

4.8.2 Impact Analysis

4.8.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential land use impacts are based on the City’s CEQA Significance Determination Thresholds (2016), which have been modified to reflect a programmatic analysis for the proposed CPU. A significant land use impact could occur if implementation of the proposed CPU would:

- 1) Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact;
- 2) Lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community;
- 3) Conflict with the provisions of the City’s Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan; or
- 4) Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

4.8.2.2 METHODOLOGY AND ASSUMPTIONS

Potential impacts resulting from implementation of the proposed CPU were evaluated based on the proposed CPU’s consistency with the City’s General Plan and MSCP Subarea Plan, the ALUCPs for SDIA and Montgomery Field, and other relevant land use plans, policies, and regulations. Consistency with the City’s MSCP Subarea Plan is further addressed in Section 4.2: Biological Resources. Impacts related to airport hazards are discussed in Section 4.5: Hazards and Hazardous Materials.

4.8.2.3 IMPACTS

Impact 4.8-1 Conflicts with Applicable Plans

Would the proposed CPU conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact?

Regional Plans

San Diego Forward: The Regional Plan

The proposed CPU's land use scenario would be consistent with the goals of SANDAG's Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles, as summarized above. The proposed CPU proposes to establish pedestrian-oriented, urban, and mixed-use community villages that would reduce reliance on the automobile and promote walking and use of alternative transportation. Policies contained within the proposed CPU would serve to promote bus, Rapid Bus, and trolley transit use as well as other forms of mobility, including walking and bicycling. These measures are consistent with the Regional Plan's smart growth strategies. The adoption and implementation of the proposed CPU would not generate any conflict or inconsistencies with the Regional Plan; therefore, impacts would be less than significant.

Local Plans

City of San Diego General Plan

Community Plans are considered part of the General Plan and are intended to further express and refine General Plan goals and policies within Community Plan areas through the provision of site-specific recommendations that implement citywide goals and policies, address community needs, and guide implementation programs and mechanisms, such as zoning. The proposed CPU would establish the framework for growth and development in the CPU area. As discussed in detail below, these goals and recommendations are consistent with the environmental goals, objectives, and guidelines stated in the General Plan.

The proposed CPU would be consistent with and would implement the General Plan's City of Villages strategy. As in the General Plan, the proposed CPU places an emphasis on directing population growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. Multiple policies in the proposed CPU promote mixed uses and walkability along corridors by requiring or encouraging ground floor commercial spaces and by detailing street-level design elements that activate storefronts and create an attractive public realm. The proposed CPU includes policies that promote pedestrian-oriented development along appropriate streets through building diversity and active frontages. Additional policies and implementing actions contained in the proposed CPU support transit-oriented development, such as parking reductions, Transit Demand Management planning, and unbundled parking.

The City of Villages strategy also embraces a commitment to environmental justice, which includes ensuring compatible industrial and residential uses and promoting equal access to healthy food, parks and green spaces, and health care and social services. The proposed CPU supports this approach by laying out policies and measures that protect public health by discouraging fast food outlets and liquor stores from locating near schools; requiring noise mitigation, landscaping, and screening walls; promoting remedial measures at locations affected by the Mission Valley Terminal release to limit adverse effects of residual levels of contaminants on human health; encouraging walking; encouraging the development of community gardens; and designating new park and recreation areas.

The purpose of the General Plan Mobility Element is to improve mobility through the development of a balanced, multi-modal transportation network that minimizes environmental impacts. The General Plan emphasizes the key relationship between its Land Use and Mobility Elements, striving to integrate land use and transportation planning decisions to foster sustainable development patterns. The proposed CPU contains recommendations for walkability, active transportation, multi-modal access, public transit, and parking to support the goals of the General Plan's Mobility Element. Specific policies include promoting bicycling; encouraging transit-oriented development in order to promote transit use; supplying an adequate amount of parking; improving the connectivity and functionality of streets; incorporating Transportation Demand Management techniques; and encouraging the use of intelligent transportation systems.

The General Plan Urban Design Element addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems and targeting new growth into compact villages. Proposed CPU urban design guidelines support and implement the General Plan's vision related to urban design at the community-scale by including specific goals, design guidelines, and policies that encourage creating active and attractive public realms; improving freeway undercrossings; maintaining attractive public open spaces; ensuring attractive, compatible building design; and ensuring safety through streetscape design.

Consistent with the General Plan Public Facilities, Services, and Safety Element, the proposed CPU also includes goals to provide and maintain infrastructure and public services for future growth without diminishing services to existing development. Proposed CPU public facilities policies are designed to supplement existing General Plan policies, which address public utilities, services and safety in depth.

The General Plan Recreation Element provides citywide guidance for the preservation, protection, acquisition, development, and enhancement of public recreation opportunities and facilities throughout the city for all users. The proposed CPU includes community-specific policies and implementing actions addressing park and recreation guidelines, preservation, and accessibility. It also highlights the importance of canyons and hillsides as important open space features and provides for their preservation and enhancement, as well as the importance of the San Diego River Park as an organizing element of the community.

Proposed CPU conservation policies tailored to conditions in the CPU area build on policies within the General Plan Conservation Element. Conservation policies address hillside and open space conservation and habitat protection, and also identify how to meet the sustainability goals of the

General Plan in areas that have been identified as suitable for development.¹ The proposed CPU policies are responsive to State legislation calling for greenhouse gas emissions reductions to be achieved in part through coordinated land use and transportation planning, and more sustainable development practices. The proposed CPU contains specific policies for reducing energy and water consumption, implementing Best Management Practices (BMPs) to preserve resources and Low Impact Development (LID) practices to manage storm water, and planting or maintaining trees to reduce air pollutants.² In addition, the proposed CPU reflects the General Plan's most recent amendment by incorporating policies that promote community gardens and urban agriculture.³

The General Plan Historic Preservation Element is intended to preserve, protect, restore, and rehabilitate historical and cultural resources throughout the city. Consistent with the General Plan, the proposed CPU includes specific policies regarding the identification and preservation of significant tribal, cultural, prehistoric, and historic resources of Mission Valley. These proposed policies including identifying and preserving historical resources and providing educational opportunities and incentives related to historic preservation.

In summary, the proposed CPU provides community-specific goals, recommendations, and policies intended to support and implement the General Plan's environmental goals, objectives, and guidelines; therefore, impacts would be less than significant.

Specific Plans

The proposed CPU's land use framework would generally accommodate the development proposed in the CPU area's Specific Plans. Specific Plan areas are shown on the proposed CPU land use diagram, and the CPU does not propose land uses in those areas that would be inconsistent with the applicable Specific Plans. Therefore, impacts would be less than significant.

Land Development Code

The proposed CPU would be implemented through the SDMC. Implementation of the proposed CPU would require amendments to SDMC Chapter 13 Article 2 Division 14 pertaining to the CPIOZs. Amendments to the SDMC to implement the proposed CPU are included as part of the project analyzed in this PEIR. With those changes, the LDC would continue to be used as an implementation tool for the proposed CPU. Impacts would be less than significant.

City of San Diego Climate Action Plan

The CAP has a number of goals that relate to land use and planning. As the proposed CPU encourages development near transit, promotes walking and biking, and promotes effective land use to reduce vehicle miles travelled (VMT), it would be consistent with action items in the CAP.

¹ See Policies for Development OSP-1 and OSP-2, AOS-1 through AOS-7, and HLS-1 through HLS-7.

² See Policies for Development GBP-1 through GBP-3 and FSR-1; Implementing Action IA-92; and Design Guidelines DG-6, DG-16, DG-25, DG-27, DG-28, DG-45, and DG-63 through DG-70.

³ See Policies for Development BPO-6 and PSD-4.

See Impact 4.4-2 in Section 4.4: Greenhouse Gas Emissions and Energy for further analysis of the proposed CPU's consistency with the CAP. Impacts would be less than significant.

Proposed CPU policies and implementing actions that would reduce impacts related to conflicts with applicable plans include policies BLK-2, STS-1, BPO-1, MXU-4, INT-1, GBP-1, GBP-2, WLK-5, BIC-2, BIC-3, BIC-4, TRN-1, PRK-1, PRK-2, STR-1, ITS-1, ITS-2, TDM-1, TDM-2, PDI-1, SMC-1, SMC-2, TAD-1, TAD-3, and TAD-4; implementing actions IA-2, IA-8, IA-13, IA-16, IA-36, IA-39, IA-40, IA-41, IA-49, IA-52, and IA-75; and design guidelines DG-6, DG-16, DG-27, DG-28, DG-45, DG-64, DG-65, DG-67, DG-68, and DG-69.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.8-2 Conversion of Open Space or Farmland

Would the proposed CPU lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

As of 2018, parks and open space/undevelopable natural areas make up 20 percent of the CPU area. The proposed CPU does not plan for the conversion of any open space for development or other uses. The proportion of parks and open space/undevelopable areas would remain the same with implementation of the proposed CPU. In addition, the proposed CPU includes policies and implementing actions that would promote the creation of public parks and open spaces and the integration of new development with existing parks and open spaces (see proposed CPU policies AOS-3, AOS-5, AOS-6 and implementing actions IA-41, IA-44, IA-49, IA-50, and IA-51).⁴ Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

⁴ See Policies for Development AOS-3, AOS-5, and AOS-6, and Implementing Actions IA-41, IA-42, IA-47, IA-50, IA-53, and IA-54.

Impact 4.8-3 Conflicts with the MSCP Subarea Plan and the Vernal Pool Habitat Conservation Plan

Would the proposed CPU conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

Multiple Species Conservation Program Subarea Plan

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms. The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources.

The CPU area includes land identified as MHPA on either side of the San Diego River as well as some portions along its northern and southern borders. Proposed CPU policies and actions do not conflict with the provisions of the City's MSCP Subarea Plan. Rather, the proposed CPU supports the implementation of applicable requirements of the City's ESL Regulations, Biology Guidelines, and the MSCP Subarea Plan for the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources.

A number of policies and implementing actions under the proposed CPU support implementation of the MSCP Subarea Plan's directives as described in the Regulatory Setting above. Proposed CPU policies that address land uses and activities consider noise exposure mitigation, and preservation of existing parks and open space areas, among others. Proposed policies address compliance with State regulations related to hazardous materials. Proposed policies related to trails, roads, and facilities maintenance include actions to improve trail connectivity and linkages, to integrate ranger stations, and to provide adequate signage. The proposed CPU also includes ~~implementation~~ implementing actions to promote revegetation using native plant species. Other CPU policies and ~~implementation~~ implementing actions seek to ensure adequate infrastructure funding, flood control mitigation, adequate water storage, and storm water best management practices.

Additionally, potential indirect impacts to sensitive habitats and wildlife species within the MHPA could occur if development occurs adjacent to MHPA lands. In areas adjacent to MHPA areas, short-term construction impacts could result in the disruption of nesting and breeding, thus affecting the population of sensitive species. Other indirect effects include increased runoff; trampling and removal of plant cover due to hiking, biking and other human activities; increased presence of toxins; increased nighttime light levels; redirection or blockage of wildlife movement; and increased levels of non-native and invasive plants. To address these concerns, the MSCP includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project level. Adherence to these guidelines would avoid significant impacts to adjacent MHPA lands within the CPU area. The proposed CPU supports the implementation of the MHPA Land Use Adjacency Guidelines through proposed policies OSP-1, FSR-1, FSR-2, and SDR-5 and Implementing Action IA-58 61 related to controlling runoff; policies OSP-2 and AOS-5 and implementing actions IA-53 54 and IA-64 62, related to the provision of trails to prevent trampling and removal of plant cover, to educate users on sensitive natural habitats, and to ensure that wildlife

movement is not blocked; and Implementing Action IA-59 60, which addresses revegetation using native plant species.

Wetland habitats both within existing open space and/or the MHPA and outside of the MHPA would be protected from disturbance through the City's ESL Regulations, which cover sensitive biological resources, including wetlands, within and outside of the coastal zone and the MHPA. Future development projects implemented under the proposed CPU would be reviewed on a project-by-project basis to determine if impacts to wetlands would occur. If impacts to wetlands would occur, they would be regulated by the U.S. Army Corps of Engineers according to Section 404 of the Clean Water Act (CWA), the Regional Water Quality Control Board in accordance with Section 401 of the CWA, CDFW under Section 1600 of California Fish and Game Code, and the City in accordance with the City's Biology Guidelines (see Section 4.2: Biological Resources).

Therefore, the proposed CPU would not conflict with the provisions of the City's MSCP Subarea Plan, and impacts would be less than significant.

Vernal Pool Habitat Conservation Plan

The City's VPHCP provides coverage for threatened and endangered vernal pool species that as of 2018 do not have federal coverage under the City's MSCP Subarea Plan. Within the CPU boundary, the area adjacent to the San Diego River is included as "Baseline Conservation" in the VPHCP. Proposed CPU policies that support implementation of the MSCP Subarea Plan would also support implementation of the VPHCP. Therefore, the proposed CPU would not conflict with the provisions of the City's VPHCP and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.8-4 Conflicts with an Adopted ALUCP

Would the proposed CPU result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

Airspace protection concerns relating to both the SDIA and Montgomery-Gibbs Executive Airport apply to portions of the CPU area in the AIA of each airport. The City requires an FAA determination of no hazard to air navigation for both ministerial and discretionary projects that exceed the Part 77 Notification Surfaces prior to approving or recommending approval pursuant to SDMC Sections 132.0207 and 132.1520. As such, impacts to airspace protection would be less than significant.

Overflight compatibility concerns pertaining to both the SDIA and Montgomery-Gibbs Executive Airport also apply to portions of the CPU area in the AIA of each airport. Per Montgomery Field ALUCP Policy 2.2.29 and SDIA ALUCP Policy O.2, an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. The recording of an overflight notification agreement is not necessary where the dedication

of an aviation easement is required. Alternative methods of providing overflight notification are acceptable if approved by the ALUC.

Thus, implementation of the proposed CPU would be consistent with the adopted ALUCPs as future development within the CPU area would be subject to the requirements of the ALUCPs, the SDMC, and associated FAA requirements. Impacts related to conflicts with an adopted ALUCP would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required

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4.9 Noise

This section addresses the potential noise impacts that would result from implementation of the proposed CPU. It also discusses the regulations applicable to future development that could occur under the proposed CPU. This section is based on the Noise Analysis for the Mission Valley Community Plan Update (RECON Environmental; November 13, 2018), which is included as Appendix J.

4.9.1 Environmental Setting

4.9.1.1 PHYSICAL SETTING

Existing noise sources in the CPU area include transportation and stationary sources. Transportation noise sources include vehicle traffic on freeways and local roadways and trolley traffic. Stationary noise sources include commercial operations. Existing ambient noise levels were measured in the CPU area to provide a characterization of the variability of noise and to assist in determining the constraints and opportunities for future development. Figure 4.9-1 shows noise measurement locations and Table 4.9-1: Noise Measurements, summarizes the noise measurement results.

The specific existing noise conditions for the CPU area are discussed in the Noise Analysis (Appendix J).

Table 4.9-1: Noise Measurements

ID ¹	Location	Date	Time	Leq
MV-1	Friars Road at Goshen Street	9/16/2015	1:07 p.m. – 1:22 p.m.	63.4
MV-2	Hotel Circle North east of the Crowne Plaza	9/16/2015	2:00 p.m. – 2:15 p.m.	65.1
MV-3	Hazard Center Drive west end	9/16/2015	2:41 p.m. – 2:56 p.m.	66.1
MV-4	Friars Road east of Frazee	9/16/2015	3:47 p.m. – 4:02 p.m.	65.2
MV-5	Camino del Rio South at the Scottish Right Event Center	9/16/2015	4:36 p.m. – 4:51 p.m.	73.0
MV-6	I-8 at I-805	9/16/2015	5:28 p.m. – 5:43 p.m.	76.4
MV-7	Rio San Diego Drive east of River Run Drive	9/17/2015	9:22 a.m. – 9:37 a.m.	56.2
MV-8	Fenton Parkway south end	9/17/2015	9:58 a.m. – 10:13 a.m.	59.9
MV-9	Qualcomm Way at Rio San Diego Drive	9/17/2015	11:03 a.m. – 11:18 a.m.	65.4
MV-10	San Diego Trolley east of Mission Valley Center Station	9/17/2015	12:12 p.m. – 12:27 p.m.	60.2

Notes:

1. Measurement locations are shown in Figure 4.9-1 and correspond to the ID provided above.

Leq = one-hour equivalent noise level

Source: RECON, 2019.

4.9.1.2 REGULATORY SETTING

State Regulations

California Code of Regulations

Noise Insulation Standards

Interior noise levels for habitable rooms are regulated by Title 24 of the California Code of Regulations (CCR; 2016), ~~California Noise Insulation Standards~~. Title 24, Part 2, Chapter 12, Section 1207 of the California Building Code (CBC) requires that interior noise levels, attributable to exterior sources, not exceed 45 CNEL (Community Noise Equivalent Level) in any habitable room.

California Green Building Standards Code – Environmental Comfort

~~For nonresidential structures, Title 24, Part 11 Chapter 12, Section 1207.5 (otherwise known as refers to the 2016 California Green Building Standards Code ([CALGreen]), Chapter 5 – Nonresidential Mandatory Measures, Division 5.5 – Environmental Quality, Section 5.507 – Environmental Comfort, Subsection 5.507.4 – Acoustical Control, regulates interior noise for nonresidential structures.~~ Pursuant to these standards, all nonresidential building construction shall employ building assemblies and components that achieve a composite sound transmission class rating of at least 50 or shall otherwise demonstrate that exterior noise shall not result in an interior noise environment where noise levels exceed 50 A-weighted equivalent decibels [dB(A) Leq] in occupied areas during any hour of operation (24 CCR 1207.5 2016).

Figure 4.9-1: Noise Measurement Locations



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Local Regulations

City of San Diego General Plan

The Noise Element of the General Plan specifies compatibility guidelines for different categories of land use. The Land Use – Noise Compatibility Guidelines are summarized in Table 4.9-2. As shown in Table 4.9-2, for a particular land use category, noise levels are either considered compatible, conditionally compatible, or incompatible. A “compatible” land use indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference. Evaluation of land use that falls into the “conditionally compatible” noise environment should have an acoustical study. For land uses indicated as conditionally compatible, structures must be capable of attenuating exterior noise to the indoor noise level shown in Table 4.9-2. For land uses indicated as incompatible, new construction should generally not be undertaken. Due to severe noise interference, outdoor activities are unacceptable and for structures, extensive mitigation techniques are required to make the indoor environment acceptable.

The City specifies that residential structures shall be designed to prevent the intrusion of exterior noises such that interior noise levels attributable to exterior sources do not exceed 45 CNEL in noise-sensitive interior rooms. This conforms to Title 24 of the CCR, which requires interior noise levels for habitable rooms due to exterior sources not to exceed 45 CNEL (see discussion on the California Code of Regulations Noise Insulation Standards). The City also specifies that the interior noise level due to exterior sources is not to exceed 45 CNEL for institutional uses and is not to exceed 50 CNEL for office buildings and commercial uses.

Table 4.9-2: City of San Diego – Land Use – Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure [dB(A) CNEL]			
	60	65	70	75
<i>Parks and Recreational</i>				
Parks, Active and Passive Recreation				
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities				
<i>Agricultural</i>				
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses, Animal Raising, Maintain & Keeping; Commercial Stables				
<i>Residential</i>				
Single Dwelling Units; Mobile Homes		45		

Table 4.9-2: City of San Diego – Land Use – Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure [dB(A) CNEL]			
	60	65	70	75
Multiple Dwelling Units <i>*For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.</i>		45	45*	
Institutional				
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45		
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities)		45	45	
Cemeteries				
Retail Sales				
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50
Commercial Services				
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50
Visitor Accommodations		45	45	45
Offices				
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50
Vehicle and Vehicular Equipment Sales and Services Use				
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking				
Wholesale, Distribution, Storage Use Category				
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution				
Industrial				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries				

Table 4.9-2: City of San Diego – Land Use – Noise Compatibility Guidelines

Land Use Category			Exterior Noise Exposure [dB(A) CNEL]			
			60	65	70	75
Research & Development					50	
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.			
		Outdoor Uses	Activities associated with the land use may be carried out.			
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas. Refer to Section I.			
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.			
	Incompatible	Indoor Uses	New construction should not be undertaken.			
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.			
<p>Note: dB(A) = A-weighted decibels; CNEL = community noise equivalent level</p>						

Source: City of San Diego General Plan 2015.

In addition to the Land Use – Noise Compatibility Guidelines, Section B of the Noise Element provides additional guidance for multi-family and mixed-use residential developments that is applicable to the CPU area. Section B of the Noise Element states that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 CNEL with a requirement to include attenuation measures to ensure an interior noise level of 45 CNEL where a community plan allows multi-family and mixed-use. In addition, the General Plan contains the following policies regarding the preparation of acoustical studies and interior noise guidelines:

- NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.
- NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California’s noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.

- NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.
- NE-E.5. Implement night and daytime on-site noise level limits to address noise generated by commercial uses where it affects abutting residential and other noise-sensitive uses.

City of San Diego Municipal Code

Stationary Noise

Impacts to sensitive receptors generated by activities at a given location are regulated by the City of San Diego's Municipal Code (SDMC). Section 59.5.0401 of the Noise Abatement and Control Ordinance specifies maximum one-hour average sound level limits at the boundary of a property. These maximum one-hour sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. Where two or more zones adjoin, the sound level limit is the arithmetic mean of the respective limits for the two zones. Table 4.9-3 shows the exterior noise limits specified in the City's Noise Abatement and Control Ordinance.

Table 4.9-3: City of San Diego Property Line Noise Limits

Receiving Land Use Category	Noise Level [dB(A)]		
	7:00 a.m. to 7:00 p.m.	7:00 p.m. to 10:00 p.m.	10:00 p.m. to 7:00 a.m.
Single-family Residential	50	45	40
Multi-family Residential (up to a maximum density of 1 dwelling unit/2,000 square feet)	55	50	45
All Other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75

Source: City of San Diego, Municipal Code Section 59.5.0401.

Construction Noise

Construction noise is regulated by SDMC Section 59.5.0404, the Noise Abatement and Control Ordinance, which states that:

- A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise.

- B. . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

4.9.2 Impact Analysis

4.9.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to noise are based on the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (2016), which have been modified to reflect a programmatic analysis for the proposed CPU. A significant impact related to noise could occur if implementation of the proposed CPU would:

- 1) Result in or create a significant increase in the existing ambient noise levels;
- 2) Result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan;
- 3) Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP);
- 4) Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code;
- 5) Result in the exposure of people to significant temporary construction noise; or
- 6) Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

4.9.2.2 METHODOLOGY AND ASSUMPTIONS

a. Vehicle Traffic Noise

Traffic noise occurs adjacent to every roadway and is directly related to the traffic volume, speed, and mix of vehicles. Traffic volumes and speeds for the local roadways were obtained from the Traffic Impact Analysis prepared for the proposed CPU (Appendix D). Existing freeway volumes were obtained from the California Department of Transportation (Caltrans) traffic counts (2016). Future freeway volumes were obtained from the San Diego Association of Governments' (SANDAG) Transportation Forecast Information Center (SANDAG, 2018). Detailed traffic parameters can be found in the Noise Analysis (Appendix J).

The Federal Highway Administration (FHWA) Traffic Noise Model algorithms were used to calculate distances to noise contours for each roadway. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and sensitive receptors; and shielding provided by intervening terrain or structures.

b. Trolley Noise

The San Diego Metropolitan Transit System (MTS) provides trolley service along a railway alignment designated the “Green Line.” The Green Line Trolley generally parallels Interstate (I-) 8 throughout the planning area. The trolleys travel between 15 and 60 miles per hour (mph). This is based on the distances between trolley stations and the average timing between stations obtained from published trolley schedules. Noise associated with trolley operations was modeled using the Federal Transit Administration’s (FTA’s) recommended Chicago Rail Efficiency and Transportation Efficiency (CREATE) railroad noise model (Harris, Miller, Miller & Hanson, Inc., 2006). Noise contour distances were calculated assuming flat-site conditions and no intervening buildings that would provide noise attenuation.

c. Stationary Noise

Stationary sources of noise include activities associated with a given land use. The CPU area includes multiple land uses, including residential, commercial, and mixed-use land uses as well as recreational and institutional uses. Various land uses contain on-site stationary noise sources, including rooftop heating, ventilation, and air conditioning equipment (HVAC); mechanical equipment; emergency electrical generators; parking lot activities; loading dock operations; and recreational activities. Stationary noise is considered a “point source” and attenuates over distance at a rate of 6 A-weighted decibels [dB(A)] for each doubling of distance. The exact location and nature of future stationary noise sources is not known at this time. Impacts are assessed in this analysis by identifying potential types of stationary sources and locations of mixed-use land use interfaces and identifying applicable regulations and a mitigation framework for addressing impacts.

d. Construction Noise

No specific construction or development would occur as a result of the adoption of the proposed CPU; however, future development consistent with the proposed CPU will occur over time as individual projects are proposed. Future development under the proposed CPU could potentially result in temporary ambient noise increases due to construction activities.

Construction noise is generated by diesel-powered construction equipment used for site preparation and grading; removal of existing structures and pavement; and loading, unloading, placing materials, and paving. Diesel engine-driven trucks also bring materials to the site and remove the spoils from excavation. Table 4.9-4 summarizes typical construction equipment noise levels.

Table 4.9-4: Typical Construction Equipment Noise Levels

Equipment	Noise Level at 50 Feet [dB(A) L_{eq}]	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt ampts or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%

Note: dB(A) L_{eq} = A-weighted decibels average noise level

Source: Federal Highway Administration, 2006.

Construction equipment could generate maximum noise levels between 70 and 95 dB(A) maximum sound level (L_{max}) at 50 feet from the source when in operation. During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Average construction noise levels were calculated for the simultaneous operation of three common pieces of construction equipment: the backhoe, excavator, and loader. The usage factors were applied to the maximum noise level at 50 feet for each piece of equipment, and then noise levels were added logarithmically. Hourly average noise levels would be approximately 83 dB(A) L_{eq} (one-hour equivalent noise level) at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. Noise levels would vary depending on the nature of the construction including the duration of specific activities, the equipment involved, location of the particular receiver, and the presence of intervening barriers.

Impacts are assessed in this analysis by identifying potential construction noise levels and buffer distances at which construction noise levels would be less than the noise levels identified in the City's Noise Abatement and Control Ordinance (75 decibels [dB]).

e. Vibration

Potential sources of ground-borne vibration could come from railway operations. For conventional commuter railroad traffic such as the train and freight traffic that occurs on the railway at the western CPU area boundary, the FTA provides generalized screening distances for land uses that may be subject to vibration impacts (FTA, 2018). For Category 1 uses such as vibration sensitive equipment, the screening distance from the right-of-way is 600 feet. For Category 2 land uses such as residences and buildings where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses such as institutional land uses with primarily daytime uses, is 120 feet. These screening distances were used to assess vibration impacts due to the railway at the western CPU area boundary.

The east-west tracks that bisect the CPU area provide only trolley service (Green Line Trolley) and do not include larger commuter trains or freight trains. Trolleys do not generate the same vibration levels as larger trains. Additionally, portions of the Green Line Trolley are elevated above grade and would not cause significant vibration at adjacent uses. Thus, the screening distances discussed above would be overly conservative. Therefore, for portions of the railway that are at-grade, rather than using the generalized screening distances for conventional commuter railroad traffic, FTA methodology and equations provided in their Transit Noise and Vibration Impact Assessment Manual (FTA, 2018) were used to calculate potential site-specific vibration levels within the CPU area.

4.9.2.3 IMPACTS

Impact 4.9-1: Increase in Ambient Noise

Would the proposed CPU result in or create a significant increase in the existing ambient noise level?

As discussed in Section 4.9.1, existing noise levels were measured in the planning area to identify ambient noise conditions (refer to Table 4.9-1). Ambient noise levels at the measurement locations ranged from 60.2 to 76.4 dB(A) L_{eq} .

Traffic noise generally dominates the noise environment around the CPU area. Future development implemented under the proposed CPU would increase traffic along local roadways due to increased density and intensity of uses throughout the CPU area. Traffic noise increases may affect various noise-sensitive land uses, including residences. Using the traffic parameters summarized in the Noise Analysis, a traffic noise analysis was completed for the buildout of the proposed CPU (see Appendix J). Table 4.9-5 summarizes the existing and buildout traffic noise levels along various roadway segments in the CPU area. Roadway noise is measured in CNEL at 50 feet from the roadway centerline.

A significant impact could occur if buildout of the proposed CPU would result in traffic noise levels that exceed the City's significance thresholds for traffic noise. Per the City's significance thresholds, if a land use is currently at or exceeds the significance thresholds for traffic noise, then an increase of more than 3 dB is considered significant.

The CPU area is dominated by freeway noise. There are some roadway segments that experience noise level increases that are 3 dB or greater (see Table 4.9-5); however, given their proximity to a freeway and the associated freeway noise, the actual increase in ambient noise levels attributable to the specified roadway would be less than 3 dB. Additionally, there are areas where there are no noise-sensitive land uses. In order to specifically identify where noise impacts would occur, the surrounding land uses as well as their proximity to freeways were more closely examined to determine if the noise level increase along identified roadway segments would be significant.

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
I-5	Washington Street	Old Town Avenue	85.6	85.2	-0.4
	Old Town Avenue	I-8	85.7	86.2	0.5
	I-8	Sea World Drive	85.7	85.4	-0.3
	Sea World Drive	Clairemont Drive	86.0	86.4	0.4
I-8	Midway Drive	I-5	82.5	82.7	0.2
	I-5	Morena Boulevard	83.7	84.2	0.5
	Morena Boulevard	Hotel Circle/Taylor Street	85.3	85.4	0.1
	Hotel Circle/Taylor Street	Hotel Circle	85.4	85.4	0.0
	Hotel Circle	SR-163	85.7	85.6	-0.1
	SR-163	Mission Center Road	85.8	85.3	-0.5
	Mission Center Road	Texas Street	86.1	85.9	-0.2
	Texas Street	I-805	85.6	85.3	-0.3
	I-805	I-15	86.3	86.3	0.0
	I-15	Fairmount Avenue	85.9	87.1	1.2
I-15	Fairmount Avenue	Waring Road	86.3	86.2	-0.1
	El Cajon Boulevard	Adams Avenue	84.9	85.8	0.9
	Adams Avenue	I-8	85.1	86.0	0.9
	I-8	Friars Road	86.0	87.0	1.0
I-805	Friars Road	Aero Drive	86.1	86.7	0.6
	El Cajon Boulevard	Adams Avenue	85.9	86.5	0.6
	Adams Avenue	I-8	86.3	87.0	0.7
	I-8	Murray Ridge	86.1	87.1	1.0
SR-163	Murray Ridge	Kearny Villa Road	86.0	87.2	1.2
	Washington Street	6th Avenue	83.6	83.7	0.1
	6th Avenue	I-8	84.5	85.3	0.8
	I-8	Friars Road	84.3	85.2	0.9
	Friars Road	Genesee Avenue	85.0	85.8	0.8
Phyllis Place	Genesee Avenue	Mesa College Drive	84.6	85.7	1.1
	Abbotshill Hill Road	I-805 SB Ramps	57.0	68.5	11.5
Sea World Drive	Mission Bay Parkway	Friars Road	75.0	75.8	0.8
	Friars Road	I-5 SB Ramps	72.0	72.7	0.7
Tecolote Road	I-5 SB Ramps	I-5 NB Ramps	72.2	72.7	0.5
	I-5 NB Ramps	Morena Boulevard	69.5	71.0	1.5

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Mission Valley Road	Frazee Road	Metropolitan Drive	62.1	61.5	-0.6
	Metropolitan Drive	Mission Center Road	62.1	65.5	3.4
Civita Boulevard	Mission Center Road	Via Alta	57.3	60.4	3.1
	Via Alta	Qualcomm Way	57.3	59.6	2.3
	Qualcomm Way	Franklin Ridge Road	– ¹	63.8	–
Westside Drive	Mission Center Road	Via Alta	59.5	60.5	1.0
Friars Road	Sea World Drive	Napa Street	72.0	72.6	0.6
	Napa Street	Colusa Street	71.4	71.4	0.0
	Colusa Street	Via Las Cumbres	71.4	72.6	1.2
	Via Las Cumbres	Fashion Valley Road	72.0	72.5	0.5
	Fashion Valley Road	Via de la Moda	72.7	72.9	0.2
	Via de la Moda	Fashion Valley Driveway	72.7	72.8	0.1
	Fashion Valley Driveway	Avenida de las Tiendas	72.8	74.7	1.9
	Avenida de las Tiendas	Ulric Street/SR-163 SB Ramps	74.6	76.2	1.6
	Ulric Street/SR-163 SB Ramps	SR-163 NB Ramps	75.8	76.0	0.2
	SR-163 NB Ramps	Frazee Road	75.9	75.1	-0.8
	Frazee Road	Mission Center Road	76.0	75.8	-0.2
	Mission Center Road	Qualcomm Way	75.4	75.2	-0.2
	Qualcomm Way	River Run Drive	74.9	75.6	0.7
	River Run Drive	Fenton Parkway	73.1	75.7	2.6
	Fenton Parkway	Northside Drive	74.2	75.0	0.8
	Northside Drive	San Diego Mission Road	76.2	76.8	0.6
	San Diego Mission Road	I-15 SB Ramps	77.3	79.0	1.7
	I-15 SB Ramps	I-15 NB Ramps	75.2	77.2	2.0
	I-15 NB Ramps	Rancho Mission Road	75.7	77.0	1.3
	Rancho Mission Road	Santo Road	74.5	76.2	1.7
Santo Road	Riverdale Street	74.9	76.5	1.6	
Riverdale Street	Mission Gorge Road	73.5	74.8	1.3	
Mission Gorge Road	Friars Road	Zion Avenue	74.6	73.8	-0.8
	Avenida del Rio	Hazard Center W. Driveway	–	67.0	–

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Hazard Center Drive	Hazard Center W. Driveway	Mission Center Road	65.4	68.0	2.6
Rio San Diego Drive	Gill Village Way	Qualcomm Way	67.5	69.3	1.8
	Qualcomm Way	River Run Drive	67.9	69.0	1.1
	River Run Drive	Fenton Parkway	66.9	68.8	1.9
San Diego Mission Road	Friars Road EB Ramps	Rancho Mission Road	66.1	68.3	2.2
	Rancho Mission Road	950 feet West of Fairmount Avenue	65.0	67.4	2.4
	950 feet West of Fairmount Avenue	Fairmount Avenue	65.0	67.4	2.4
Taylor Street	Pacific Highway	Morena Boulevard	68.8	62.0	-6.5
	Morena Boulevard	I-8 EB Ramps	68.5	63.0	-4.6
	I-8 EB Ramps	Hotel Circle South	67.6	65.1	-3.2
Hotel Circle North	Hotel Circle South	Fashion Valley Road	68.3	67.5	-1.7
	Fashion Valley Road	I-8 WB Off-ramp	69.2	70.0	5.9
	I-8 WB Off-ramp	Street J Riverwalk Street "J"	64.1	67.8	3.7
	Street J Riverwalk Street "J"	I-8 WB On-ramp	64.1	61.2	-6.7
	I-8 WB On-ramp	Hotel Circle South	67.9	63.4	0.7
Camino de la Reina	Hotel Circle North	Avenida del Rio	62.7	67.3	1.1
	Avenida del Rio	Camino de la Siesta	66.2	62.0	-6.5
	Camino de la Siesta	Mission Center Road	65.3	65.3	0.0
	Mission Center Road	Camino del Este	67.6	67.9	0.3
	Camino del Este	Qualcomm Way	66.3	66.2	-0.1
Camino del Rio North	Camino de la Siesta	Mission Center Road	63.3	67.1	3.8
	Mission Center Road	I-8 WB Ramps	69.8	70.7	0.9
	I-8 WB Ramps	Camino del Este	66.8	66.5	-0.3
	Camino del Este	Qualcomm Way	66.9	69.3	2.4
	Qualcomm Way	Mission City Parkway	68.8	70.5	1.7
	Mission City Parkway	800 feet East of Mission City Parkway	64.0	64.4	0.4
	800 feet East of Mission City Parkway	1,800 feet West of Ward Road	67.6	68.0	0.4
	1,800 feet West of Ward Road	Ward Road	68.1	68.4	0.3

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
	Ward Road	1,000 feet West of Fairmount Avenue	69.3	68.4	-0.9
	1,000 feet West of Fairmount Avenue	Fairmount Avenue	69.8	71.6	1.8
Hotel Circle South	Taylor Street	I-8 EB Off-Ramp	66.8	60.9	-5.9
	I-8 EB Off-Ramp	<u>Riverwalk Street "J"</u>	66.9	67.9	1.0
	<u>Riverwalk Street "J"</u>	I-8 EB On-Ramp	66.9	70.8	3.9
	I-8 EB On-Ramp	Bachman Place	68.4	67.5	-0.9
	Bachman Place	Hotel Circle North	67.9	67.7	-0.2
Camino del Rio South	Western Terminus	1,800 feet west of Mission Center Road	62.0	62.1	0.1
	1,800 feet west of Mission Center Road	Mission Center Road	64.4	64.8	0.4
	Mission Center Road	Texas Street	64.7	65.4	0.7
	Texas Street	Mission City Parkway	65.1	66.5	1.4
	Mission City Parkway	I-15 SB Off-ramp	69.2	70.0	0.8
	I-15 SB Off-ramp	I-15 SB On-ramp	67.1	69.6	2.5
	I-15 SB On-ramp	Fairmount Avenue	65.4	66.2	0.8
West Morena Boulevard	Tecolote Road	Morena Boulevard	-	68.2	-
Morena Boulevard	Tecolote Road	West Morena Boulevard	68.1	-	-
	West Morena Boulevard	Linda Vista Road	69.8	69.4	-0.4
	Linda Vista Road	I-8 WB Off-ramp	73.6	71.9	-1.7
	I-8 WB Off-ramp	Taylor Street	66.6	67.9	1.3
Napa Street	Morena Boulevard	Friars Road	64.7	65.4	0.7
Colusa Street	Linda Vista Road	Friars Road	57.7	57.5	-0.2
Via Las Cumbres	Linda Vista Road	Friars Road	66.4	66.9	0.5
	Friars Road	South End	-	63.0	-
<u>Riverwalk Street "J"</u>	Friars Road	Riverwalk Drive	-	66.5	-
	Riverwalk Drive	Levi-Cushman Street "B" <u>Riverwalk Street "U"</u>	-	68.4	-
	Levi-Cushman Street "B" <u>Riverwalk Street "U"</u>	Hotel Circle North	-	68.5	-

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Fashion Valley Road	Friars Road	Riverwalk Drive	66.0	65.1	-0.9
	Riverwalk Drive	Levi-Cushman Street "B" <u>Riverwalk Street "U"</u>	66.0	68.4	2.4
	Levi-Cushman Street "B" <u>Riverwalk Street "U"</u>	Hotel Circle North	66.0	69.9	3.9
Bachman Place	Hotel Circle South	Lewis Street	66.9	70.5	3.6
Avenida del Rio	Fashion Valley Parking Lot	Camino de la Reina	65.4	68.8	3.4
Ulric Street	Fashion Hills Boulevard	600 feet South of Fashion Hills Boulevard	70.4	71.4	1.0
	600 feet South of Fashion Hills Boulevard	Friars Road	70.4	71.7	1.3
Camino de la Siesta	Camino de la Reina	Camino del Rio North	60.5	63.1	2.6
Metropolitan Drive	Mission Valley Road	Murray Canyon Road	59.2	64.0	4.8
	Murray Canyon Road	Frazee Road	59.2	46.4	-12.8
Murray Canyon Road	Metropolitan Drive	Frazee Road	63.6	62.4	-1.2
Frazee Road	Metropolitan Drive	Murray Canyon Road	-	61.3	-
	Murray Canyon Road	Friars Road	66.6	68.0	1.4
	Friars Road	Hazard Center Drive	67.3	67.8	0.5
Mission Center Road	Murray Ridge Road	1,200 feet West of Murray Ridge Road	69.0	70.2	1.2
	1,200 feet West of Murray Ridge Road	950 feet North of Mission Valley Road	68.9	70.2	1.3
	950 feet North of Mission Valley Road	Mission Valley Road	67.7	69.0	1.3
	Mission Valley Road	Westside Drive	68.8	70.4	1.6
	Westside Drive	Friars Road WB Ramps	71.5	72.5	1.0
	Friars Road WB Ramps	Friars Road EB Ramps	70.9	71.4	0.5
	Friars Road EB Ramps	Mission Center Court	70.2	70.8	0.6
	Mission Center Court	Hazard Center Drive	70.2	71.5	1.3
	Hazard Center Drive	Camino de la Reina	71.7	72.4	0.7
Camino de la Reina	Camino del Rio North	71.0	72.3	1.3	
Camino del Rio North	I-8 EB Ramps	72.7	73.5	0.8	

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Auto Circle	I-8 EB Ramps	Camino del Rio South	70.6	69.9	-0.7
Via Alta	Franklin Ridge Road	Civita Boulevard	54.7	63.8	9.1
	Civita Boulevard	Westside Drive	54.7	61.5	6.8
Murray Ridge Road	Mission Center Road	I-805 NB Ramps	69.0	69.8	0.8
	I-805 NB Ramps	I-805 SB Ramps	66.7	69.9	3.2
Russell Park Way	Friars Road	Civita Boulevard	55.0	63.6	8.6
Camino del Este	Rio San Diego Drive	Camino de la Reina	65.3	67.4	2.1
	Camino de la Reina	Camino del Rio North	63.3	66.0	2.7
Franklin Ridge Road	Phyllis Place	Via Alta	–	68.4	–
	Via Alta	Civita Boulevard	–	65.7	–
Qualcomm Way	Civita Boulevard	Friars Road WB Ramps	– ¹	67.9	–
	Friars Road WB Ramps	Friars Road EB Ramps	65.7	70.8	5.1
	Friars Road EB Ramps	Rio San Diego Drive	66.1	70.2	4.1
	Rio San Diego Drive	Camino del Rio North	69.9	72.3	2.4
	Camino del Rio North	I-8 WB Ramps	69.7	72.9	3.2
	I-8 WB Ramps	I-8 EB Ramps	71.6	73.3	1.7
	I-8 EB Ramps	Camino del Rio South	70.1	71.1	1.0
Texas Street	Camino del Rio South	1,400 feet North of Madison Avenue	72.0	72.5	0.5
	1,400 feet North of Madison Avenue	Madison Avenue	72.0	72.5	0.5
	Madison Avenue	Meade Avenue	65.7	66.5	0.8
	Meade Avenue	El Cajon Boulevard	65.0	65.3	0.3
River Run Drive	Friars Road	Rio San Diego Drive	59.4	59.5	0.1
Fenton Parkway	Portofino Driveway	Friars Road	59.5	60.3	0.8
	Friars Road	Rio San Diego Drive	66.0	66.9	0.9
	Rio San Diego Drive	Del Rio Apartments Driveway	62.3	64.6	2.3
	Del Rio Apartments Driveway	New Mission City Street “I”	–	64.6	–
	New Mission City Street “I”	Camino del Rio North	–	66.4	–

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Mission City Parkway	Camino del Rio North	Camino del Rio South	64.1	66.4	2.3
Northside Drive	Portofino Driveway	Friars Road	61.6	60.5	-1.1
	Friars Road	Fenton Marketplace Driveway	68.0	68.9	0.9
	Fenton Marketplace Driveway	Lowe's Frontage Road	67.0	67.9	0.9
Mission Village Drive	Ronda Avenue	Friars Road WB Ramps	70.9	71.1	0.2
	Friars Road WB Ramps	Friars Road EB Ramps	69.9	73.4	3.5
Rancho Mission Road	Friars Road	San Diego Mission Road	67.1	68.1	1.0
	San Diego Mission Road	Camino del Rio North	65.8	68.9	3.1
Santo Road	Northern Terminus	Friars Road	63.0	66.9	3.9
Riverdale Street	Zion Road	Friars Road	59.4	58.4	-1.0
	Friars Road	Vandever Avenue	64.4	69.2	4.8
Mission Gorge Road	Friars Road	Camino del Rio North	66.6	68.5	1.9
Fairmount Avenue	Camino del Rio North/ I-8 WB Off-ramp	I-8 EB Off-ramp	72.0	73.3	1.3
	I-8 EB Off-ramp	Camino del Rio South	75.2	75.7	0.5
Riverwalk Drive	West of <u>Riverwalk Street "J"</u>		-	61.2	-
	<u>Riverwalk Street "J"</u>	Fashion Valley Road	-	59.2	-
	Fashion Valley Road	Avenida del Rio	-	65.2	-
<u>Levi-Cushman Street "B"</u> <u>Riverwalk Street "U"</u>	<u>Riverwalk Street "J"</u>	Fashion Valley Road	-	66.5	-
Goshen Street	Linda Vista Road	Gaines Street	- ²	59.7	-
	Gaines Street	Friars Road	- ²	58.7	-
<u>New Mission City Street "I"</u>	Mission City Parkway	Eastern End	-	64.1	-

Table 4.9-5: Increases in Ambient Vehicle Traffic Noise (CNEL at 50 feet from Centerline)

Roadway	Segment		Base Year (2012)	CPU (2050)	Δ dB
	From	To			
Gill Village Way	Friars Road	Rio San Diego Drive	– ²	61.0	–
Rio Bonito Way	Friars Road	Rio San Diego Drive	– ²	59.5	–

Note:

Bold = 2050 noise level that would exceed the established exterior noise compatibility level for the surrounding land use and noise levels would increase by 3 dB or more.

¹ Roadway segments were constructed after 2012. Therefore, 2012 noise contours do not exist for these roadway segments.

² Existing conditions traffic data was not collected for these roadway segments.

Source: RECON, 2019.

The Noise Analysis identified 22 roadway segments that were found to have a 3-dB or greater increase in the ambient noise levels. Of the segments identified, the following 19 roadway segments were found to have less than significant noise impacts due to other environmental factors (i.e., surrounding land uses, proximity to freeways, and freeway noise levels). The 17 roadway segments described below include those 19 segments, where adjacent segments of the same roadway have been collapsed into a single segment for clarity.

- **Mission Valley Road from Metropolitan Drive to Mission Center Road.** No noise-sensitive land uses are located adjacent to this segment. Commercial uses are located adjacent to this segment. Noise levels would not exceed the significance threshold of 75 CNEL for commercial land uses; therefore, impacts would be less than significant.
- **Civita Boulevard from Mission Center Road to Via Alta.** Multi-family uses are located adjacent to this segment. However, noise levels would not exceed the significance threshold of 65 CNEL for multi-family residential land uses; therefore, impacts would be less than significant.
- **Two consecutive segments on Hotel Circle North, from I-8 Westbound Off-ramp to I-8 Westbound On-ramp.** Hotel and commercial land uses are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-8 exceed 75 CNEL. Although an increase of 3.7 to 5.9 dB is shown with a future noise level up to 70 CNEL, when combined with existing traffic from I-8, the actual noise increase due to Hotel Circle North would be less than 1 dB. Therefore, impacts would be less than significant.
- **Camino del Rio North from Camino de la Siesta to Mission Center Road.** Multi-family uses are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-8 exceed 75 CNEL. Although an increase of 3.8 dB is shown with a future noise level of 67 CNEL, when combined with existing traffic from I-8, the actual noise increase due to Camino del Rio North would be less than 1 dB. Therefore, impacts would be less than significant.

- **Hotel Circle South from Riverwalk Street “J” to I-8 Eastbound On-ramp.** Hotel and commercial uses are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-8 exceed 75 CNEL. Although an increase of 3.9 dB is shown with a future noise level of 71 CNEL, when combined with existing traffic from I-8, the actual noise increase due to Hotel Circle South would be less than 1 dB. Therefore, impacts would be less than significant.
- **Fashion Valley Road from ~~Levi Cushman Street “B”~~ Riverwalk Street “U” to Hotel Circle North.** Hotel uses and a golf course are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-8 range from 70 to 75 CNEL. Although an increase of 3.9 dB is shown with a future noise level of 70 CNEL, when combined with existing traffic from I-8, the actual noise increase due to Fashion Valley Road would be less than 3 dB. Therefore, impacts would be less than significant.
- **Avenida del Rio from Fashion Valley Parking Lot to Camino de la Reina.** Commercial uses are located adjacent to this segment. Noise levels would not exceed the commercial significance threshold of 75 CNEL. Additionally, existing noise levels due to vehicle traffic on SR-163 are 70 CNEL. Although an increase of 3.4 dB is shown with a future noise level of 69 CNEL, when combined with existing traffic from SR-163, the actual noise increase due to Avenida del Rio would be less than 3 dB. Therefore, impacts would be less than significant.
- **Metropolitan Drive from Mission Valley Road to Murray Canyon Road.** Commercial uses are located adjacent to this segment. Future noise levels would not exceed the significance threshold of 75 CNEL for commercial land uses; therefore, impacts would be less than significant.
- **Two consecutive segments on Via Alta, from Franklin Ridge Road to Westside Drive.** Multi-family land uses are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-805, Friars Road, and Mission Center Road exceed 65 CNEL. Although an increase of 6.8 to 9.1 dB is shown with a future noise level up to 64 CNEL, when combined with existing traffic from I-805, the actual noise increase due to Via Alta would be less than 3 dB. Therefore, impacts would be less than significant.
- **Murray Ridge Road from I-805 Northbound Ramps to I-805 Southbound Ramps.** Single-family land uses are located adjacent to this segment. However, existing noise levels due to vehicle traffic on I-805 exceed 75 CNEL. Although an increase of 3.2 dB is shown with a future noise level of 70 CNEL, when combined with existing traffic from I-805, the actual noise increase due to Murray Ridge Road would be less than 3 dB. Therefore, impacts would be less than significant.
- **Russell Park Way from Friars Road to Civita Boulevard.** The lots adjacent to this segment are currently undeveloped. Existing noise levels due to vehicle traffic on Friars Road exceed 65 CNEL. Although an increase of 8.6 dB is shown with a future noise level of 64 CNEL, when combined with existing traffic from Friars Road, the actual noise increase due to Russell Park Way would be less than 3 dB. Therefore, impacts would be less than significant.
- **Qualcomm Way from Friars Road Westbound Ramps to Friars Road Eastbound Ramps.** This roadway segment is under the Friars Road overpass and there are no existing or planned immediately adjacent land uses. Therefore, impacts would be less than significant.

- **Qualcomm Way from Friars Road Eastbound Ramps to Rio San Diego Drive.** Commercial uses are located adjacent to this segment. Future noise levels would not exceed the significance threshold of 75 CNEL for commercial land uses; therefore, impacts would be less than significant.
- **Qualcomm Way from Camino del Rio North to I-8 Westbound Ramps.** This segment is within the I-8 right-of-way and there are no existing or planned immediately adjacent land uses. Therefore, impacts would be less than significant.
- **Mission Village Drive from Friars Road Westbound Ramps to Friars Road Eastbound Ramps.** This segment is the Friars Road overpass accessing the stadium parking lot, and there are no existing or planned immediately adjacent land uses, as it is within the Friars Road right-of-way. Therefore, impacts would be less than significant.
- **Santo Road from the Northern Terminus to Friars Road.** Multi-family land uses are located adjacent to this segment; however, they are set back approximately 120 feet from the centerline of Santo Road. Noise levels at this distance would be less than 65 CNEL (59 CNEL in the existing condition and 63 CNEL at buildout). Therefore, impacts would be less than significant.
- **Riverdale Street from Friars Road to Vandever Avenue.** Commercial uses are located adjacent to this segment. Future noise levels would not exceed the significance threshold of 75 CNEL for commercial land uses; therefore, impacts would be less than significant.

A potentially significant noise impact was found adjacent to the following three roadway segments.

- **Phyllis Place from Abbots Hill Road to I-805 Southbound Ramps.** Single- and multi-family residential uses are located towards the western terminus of Phyllis Place. Noise levels are dominated by vehicle traffic on I-805, with existing noise contours ranging from 65 to 75 CNEL. However, because noise levels due to vehicle traffic on Phyllis Place would increase from 57 to approximately 69 CNEL and would result in a 3 dB increase in ambient noise levels even when taking existing traffic noise from I-805 into account, noise impacts would be significant.
- **Bachman Place from Hotel Circle South to Lewis Street.** Residential, hospital, and hotel land uses are located adjacent to this segment of Bachman Place. Noise levels currently exceed the significance threshold of 65 CNEL, and future vehicle traffic would increase ambient noise levels by more than 3 dB. Noise impacts would be significant.
- **Rancho Mission Road from San Diego Mission Road to Camino del Rio North.** Residential land uses are located adjacent to this segment of Rancho Mission Road. Existing noise levels due to I-15 would range from 65 to 75 CNEL. However, even when taking existing traffic noise from I-15 into account, future vehicle traffic noise along this roadway segment could increase by 3 dB. Noise impacts would be significant.

Existing Noise Sensitive Land Uses

The increase in ambient noise levels adjacent to these three roadway segments would result in the exposure of existing noise-sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant. As no feasible mitigation measures are available to ensure that impacts could be reduced to below a level of significance, the impact would remain significant and unavoidable.

Future Noise Sensitive Land Uses

An existing regulatory framework and review process exists for new development in areas exposed to high levels of ambient noise. Policies in the proposed CPU and General Plan related to decibel levels, procedures in the SDMC, and regulations including Title 24 would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. Nevertheless, new and existing development adjacent to these three roadway segments could experience exterior noise that cannot be adequately attenuated. Therefore, exterior noise impacts to development located in areas that exceed the applicable land use and noise compatibility level would be significant. Site-specific noise analyses demonstrating that future development implemented under the proposed CPU would not subject sensitive receptors to existing or future noise levels exceeding the Land Use—Noise Compatibility Guidelines of the General Plan would be required as part of the review process for discretionary projects. With the implementation of these regulations and procedures, noise impacts applicable to new discretionary projects would be less than significant as exterior noise would be attenuated. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts attributed to ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be significant. As there is no procedure to ensure that exterior noise is adequately attenuated for ministerial projects, no feasible mitigation measures are available, and the impact would remain significant and unavoidable. Interior noise impacts for all projects, including ministerial projects, would be less than significant because building permit applicants must demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report.

~~For all other street segments in the CPU area, the increase in ambient noise would be less than significant.~~

Mitigation Measures

The proposed CPU includes a policy encouraging retrofitting of older structures with noise sensitive land uses with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance.¹ However, because not all existing noise sensitive land uses would be retrofitted, impacts to existing sensitive land uses would be significant and unavoidable. No feasible mitigation has been identified at the program level to reduce this impact to less than significant.

¹ See Policy for Development BFD-6.

For future noise sensitive land uses, while some projects may adequately attenuate exterior noise, there could still be new noise sensitive land uses located in areas that would experience a significant increase in ambient noise levels exceeding the applicable Land Use – Noise Compatibility Guidelines, and therefore impacts would be significant and unavoidable.

Impact 4.9-2: Land Use Compatibility

Would the proposed CPU expose people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?

A significant impact could occur if implementation of the proposed CPU resulted in an exposure of people to current or future motor vehicle traffic noise levels that exceed standards established in the Noise Element of the General Plan. The CPU proposes multi-family residential, visitor accommodations, commercial, institutional, industrial, and park and open space land uses. The General Plan’s Land Use – Noise Compatibility Guidelines are as follows (City of San Diego 2015):

- Multi-family residential and mixed uses are compatible up to 60 CNEL and conditionally compatible up to 70 CNEL.
- Additionally, as stated in Section B of the Noise Element, although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 CNEL in areas affected by motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 CNEL must include attenuation measures to ensure an interior noise level of 45 CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses.
- Visitor accommodations are compatible up to 60 CNEL and conditionally compatible up to 75 CNEL.
- Sales, commercial services, and office uses are compatible up to 65 CNEL and conditionally compatible up to 75 CNEL.
- Institutional uses are compatible up to 60 CNEL and conditionally compatible up to 65 or 70 CNEL depending on the type of institutional use.
- Industrial uses are compatible up to 75 CNEL.
- Neighborhood parks are compatible up to 70 CNEL and conditionally compatible up to 75 CNEL.

Vehicle Traffic Noise

Traffic noise generally dominates the noise environment around the CPU area. The freeways generating the greatest noise levels in the CPU area are I-5, I-8, I-15, I-805, and SR-163, and the roadway segments generating the greatest noise levels include Friars Road, Mission Center Road, Qualcomm Way, and Fairmount Avenue, among others. The distances to the 60, 65, and 70 CNEL noise contours in the buildout condition for freeways and major roadways in the CPU area are shown in Table 4.9-6. Existing (2018) noise contours for the CPU area are shown in Figure 4.9-2, and future horizon year (2050) noise contours for the CPU area are shown in Figure 4.9-3.

At any specific location the actual existing noise depends on the source noise level and the nature of the path from the source to the sensitive receptor. Buildings, walls, dense vegetation, and other barriers would block the direct line of sight and reduce noise levels at the receptor. As an example, a first row of buildings would reduce traffic noise levels at receptors by 3 to 5 dB(A) behind those structures depending on the building-to-gap ratio. Large continuous structures can provide substantially greater attenuation of traffic noise.

While the General Plan Noise Element identifies a compatibility level of 60 CNEL or less for residential uses, noise levels up to 65 CNEL for single-family residential and up to 70 CNEL for multi-family residential are considered conditionally compatible, since interior noise levels can be reduced to 45 CNEL through simple means, such as closing/sealing windows and providing mechanical ventilation. Additionally, as stated in Section B of the Noise Element, although not generally considered compatible, the General Plan conditionally allows multi-family and mixed-use residential uses up to 75 CNEL in areas affected by motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 CNEL must include attenuation measures to ensure an interior noise level of 45 CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses. Project design features such as noise walls adjacent to freeways and roadways can usually reduce exterior noise levels to comply with General Plan Noise Element guidelines. Some residential land uses planned for the CPU area would be located between the 70 and 75 CNEL contours. Multi-family and mixed-use residential uses that meet the requirements of Section B of the Noise Element would be conditionally compatible up to 75 CNEL and would also be required to provide structural attenuation to reduce interior noise levels.

As shown in Figure 4.9-3, noise levels would exceed 60 CNEL in the entire CPU area at buildout (2050), and noise levels would exceed 65 CNEL in a majority of the CPU area. Noise levels greater than 75 CNEL are generally considered incompatible for all land use types. Land uses located within 239 to 288 feet of I-5, 163 to 320 feet of I-8, 262 to 315 feet of I-15, 292 to 325 feet of I-805, and 190 to 262 feet of SR-163 would potentially be exposed to noise levels greater than 75 CNEL and would be considered incompatible.

The CPU area is generally developed; however, implementation of the proposed CPU would result in changes to the land uses, which would introduce new noise-sensitive land uses in areas exceeding the Land Use – Noise Compatibility Guidelines. Therefore, impacts associated with future development within these areas would be potentially significant.

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
I-5	Washington Street	Old Town Avenue	239	516	1,111	2,393
	Old Town Avenue	I-8	279	601	1,295	2,790
	I-8	Sea World Drive	247	532	1,145	2,468
	Sea World Drive	Clairemont Drive	288	620	1,335	2,877
I-8	Midway Drive	I-5	163	351	757	1,630
	I-5	Morena Boulevard	205	442	953	2,053
	Morena Boulevard	Hotel Circle/Taylor Street	247	532	1,145	2,468
	Hotel Circle/Taylor Street	Hotel Circle	247	532	1,145	2,468
	Hotel Circle	SR-163	254	548	1,181	2,545
	SR-163	Mission Center Road	243	524	1,128	2,430
	Mission Center Road	Texas Street	266	574	1,237	2,665
	Texas Street	I-805	243	524	1,128	2,430
	I-805	I-15	283	610	1,315	2,833
	I-15	Fairmount Avenue	320	690	1,487	3,204
I-15	Fairmount Avenue	Waring Road	279	601	1,295	2,790
	El Cajon Boulevard	Adams Avenue	262	565	1,218	2,624
	Adams Avenue	I-8	271	583	1,256	2,706
	I-8	Friars Road	315	680	1,464	3,155
I-805	Friars Road	Aero Drive	301	649	1,398	3,013
	El Cajon Boulevard	Adams Avenue	292	629	1,356	2,922
	Adams Avenue	I-8	315	680	1,464	3,155
	I-8	Murray Ridge	320	690	1,487	3,204
SR-163	Murray Ridge	Kearny Villa Road	325	701	1,510	3,253
	Washington Street	6th Avenue	190	410	882	1,901
	6th Avenue	I-8	243	524	1,128	2,430
	I-8	Friars Road	239	516	1,111	2,393
	Friars Road	Genesee Avenue	262	565	1,218	2,624
Phyllis Place	Genesee Avenue	Mesa College Drive	258	557	1,199	2,584
	Abbotshill Hill Road	I-805 SB Ramps	–	35	112	354
Sea World Drive	Mission Bay Parkway	Friars Road	60	190	601	1,901
	Friars Road	I-5 SB Ramps	29	93	294	931
Tecolote Road	I-5 SB Ramps	I-5 NB Ramps	29	93	294	931
	I-5 NB Ramps	Morena Boulevard	–	63	199	629

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
Mission Valley Road	Frazee Road	Metropolitan Drive	–	–	–	–
	Metropolitan Drive	Mission Center Road	–	–	56	177
Civita Boulevard	Mission Center Road	Via Alta	–	–	–	55
	Via Alta	Qualcomm Way	–	–	–	–
	Qualcomm Way	Franklin Ridge Road	–	–	38	120
Westside Drive	Mission Center Road	Via Alta	–	–	–	56
Friars Road	Sea World Drive	Napa Street	29	91	288	910
	Napa Street	Colusa Street	22	69	218	690
	Colusa Street	Via Las Cumbres	29	91	288	910
	Via Las Cumbres	Fashion Valley Road	28	89	281	889
	Fashion Valley Road	Via de la Moda	31	97	308	975
	Via de la Moda	Fashion Valley Driveway	30	95	301	953
	Fashion Valley Driveway	Avenida de las Tiendas	47	148	467	1,476
	Avenida de las Tiendas	Ulric Street/SR-163 SB Ramps	66	208	659	2,084
	Ulric Street/SR-163 SB Ramps	SR-163 NB Ramps	63	199	629	1,991
	SR-163 NB Ramps	Frazee Road	51	162	512	1,618
	Frazee Road	Mission Center Road	60	190	601	1,901
	Mission Center Road	Qualcomm Way	52	166	524	1,656
	Qualcomm Way	River Run Drive	57	182	574	1,815
	River Run Drive	Fenton Parkway	59	186	587	1,858
	Fenton Parkway	Northside Drive	50	158	500	1,581
	Northside Drive	San Diego Mission Road	76	239	757	2,393
	San Diego Mission Road	I-15 SB Ramps	126	397	1,256	3,972
	I-15 SB Ramps	I-15 NB Ramps	83	262	830	2,624
	I-15 NB Ramps	Rancho Mission Road	79	251	792	2,506
	Rancho Mission Road	Santo Road	66	208	659	2,084
Santo Road	Riverdale Street	71	223	706	2,233	
Riverdale Street	Mission Gorge Road	48	151	477	1,510	
Mission Gorge Road	Friars Road	Zion Avenue	38	120	379	1,199

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
Hazard Center Drive	Avenida del Rio	Hazard Center West Driveway	–	25	79	251
	Hazard Center West Driveway	Mission Center Road	–	32	100	315
Rio San Diego Drive	Gill Village Way	Qualcomm Way	–	43	135	426
	Qualcomm Way	River Run Drive	–	40	126	397
	River Run Drive	Fenton Parkway	–	38	120	379
San Diego Mission Road	Friars Road EB Ramps	Rancho Mission Road	–	34	107	338
	Rancho Mission Road	950 feet West of Fairmount Avenue	–	27	87	275
	950 feet West of Fairmount Avenue	Fairmount Avenue	–	27	87	275
Taylor Street	Pacific Highway	Morena Boulevard	–	37	117	371
	Morena Boulevard	I-8 EB Ramps	–	–	25	79
	I-8 EB Ramps	Hotel Circle South	–	–	32	100
Hotel Circle North	Hotel Circle South	Fashion Valley Road	–	–	51	162
	Fashion Valley Road	I-8 WB Off-ramp	–	28	89	281
	I-8 WB Off-ramp	Riverwalk Street “J”	–	50	158	500
	Riverwalk Street “J”	I-8 WB On-ramp	–	30	95	301
	I-8 WB On-ramp	Hotel Circle South	–	–	–	66
Camino de la Reina	Hotel Circle North	Avenida del Rio	–	–	35	109
	Avenida del Rio	Camino de la Siesta	–	–	85	269
	Camino de la Siesta	Mission Center Road	–	–	54	169
	Mission Center Road	Camino del Este	–	31	97	308
	Camino del Este	Qualcomm Way	–	–	66	208
Camino del Rio North	Camino de la Siesta	Mission Center Road	–	26	81	256
	Mission Center Road	I-8 WB Ramps	–	59	186	587
	I-8 WB Ramps	Camino del Este	–	–	71	223
	Camino del Este	Qualcomm Way	–	43	135	426
	Qualcomm Way	Mission City Parkway	–	56	177	561
	Mission City Parkway	800 feet East of Mission City Parkway	–	–	44	138
	800 feet East of Mission City Parkway	1,800 feet West of Ward Road	–	32	100	315

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
	1,800 feet West of Ward Road	Ward Road	–	35	109	346
	Ward Road	1,000 feet West of Fairmount Avenue	–	35	109	346
	1,000 feet West of Fairmount Avenue	Fairmount Avenue	–	72	229	723
Hotel Circle South	Taylor Street	I-8 EB Off-Ramp	–	–	–	62
	I-8 EB Off-Ramp	<u>Riverwalk Street “J”</u>	–	31	97	308
	<u>Riverwalk Street “J”</u>	I-8 EB On-Ramp	–	60	190	601
	I-8 EB On-Ramp	Bachman Place	–	28	89	281
	Bachman Place	Hotel Circle North	–	29	93	294
Camino del Rio South	Western Terminus	1,800 feet west of Mission Center Road	–	–	26	81
	1,800 feet west of Mission Center Road	Mission Center Road	–	–	48	151
	Mission Center Road	Texas Street	–	–	55	173
	Texas Street	Mission City Parkway	–	–	71	223
	Mission City Parkway	I-15 SB Off-ramp	–	50	158	500
	I-15 SB Off-ramp	I-15 SB On-ramp	–	46	144	456
	I-15 SB On-ramp	Fairmount Avenue	–	–	66	208
West Morena Boulevard	Teecolote Road	Morena Boulevard	–	33	104	330
Morena Boulevard	West Morena Boulevard	Linda Vista Road	–	44	138	435
	Linda Vista Road	I-8 WB Off-ramp	–	77	245	774
	I-8 WB Off-ramp	Taylor Street	–	31	97	308
Napa Street	Morena Boulevard	Friars Road	–	–	55	173
Colusa Street	Linda Vista Road	Friars Road	–	–	–	–
Via Las Cumbres	Linda Vista Road	Friars Road	–	–	77	245
	Friars Road	South End	–	–	32	100
<u>Riverwalk Street “J”</u>	Friars Road	Riverwalk Drive	–	–	71	223
	Riverwalk Drive	Levi-Cushman Street “B” <u>Riverwalk Street “U”</u>	–	35	109	346
	Levi-Cushman Street “B” <u>Riverwalk Street “U”</u>	Hotel Circle North	–	35	112	354

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
Fashion Valley Road	Friars Road	Riverwalk Drive	–	–	51	162
	Riverwalk Drive	Levi-Cushman Street “B”-Riverwalk Street “U”	–	35	109	346
	Levi-Cushman Street “B”-Riverwalk Street “U”	Hotel Circle North	–	49	155	489
Bachman Place	Hotel Circle South	Lewis Street	–	56	177	561
Avenida del Rio	Fashion Valley Parking Lot	Camino de la Reina	–	38	120	379
Ulric Street	Fashion Hills Boulevard	600 feet South of Fashion Hills Boulevard	–	69	218	690
	600 feet South of Fashion Hills Boulevard	Friars Road	–	74	234	740
Camino de la Siesta	Camino de la Reina	Camino del Rio North	–	–	32	102
Metropolitan Drive	Mission Valley Road	Murray Canyon Road	–	–	40	126
	Murray Canyon Road	Frazee Road	–	–	–	71
Murray Canyon Road	Metropolitan Drive	Frazee Road	–	–	27	87
Frazee Road	Metropolitan Drive	Murray Canyon Road	–	–	–	67
	Murray Canyon Road	Friars Road	–	32	100	315
	Friars Road	Hazard Center Drive	–	30	95	301
Mission Center Road	Murray Ridge Road	1,200 feet West of Murray Ridge Road	–	52	166	524
	1,200 feet West of Murray Ridge Road	950 feet North of Mission Valley Road	–	52	166	524
	950 feet North of Mission Valley Road	Mission Valley Road	–	40	126	397
	Mission Valley Road	Westside Drive	–	55	173	548
	Westside Drive	Friars Road WB Ramps	28	89	281	889
	Friars Road WB Ramps	Friars Road EB Ramps	22	69	218	690
	Friars Road EB Ramps	Mission Center Court	–	60	190	601

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
	Mission Center Court	Hazard Center Drive	–	71	223	706
	Hazard Center Drive	Camino de la Reina	27	87	275	869
	Camino de la Reina	Camino del Rio North	27	85	269	849
Auto Circle	Camino del Rio North	I-8 EB Ramps	35	112	354	1,119
	I-8 EB Ramps	Camino del Rio South	–	49	155	489
Via Alta	Franklin Ridge Road	Civita Boulevard	–	–	38	120
	Civita Boulevard	Westside Drive	–	–	–	71
Murray Ridge Road	Mission Center Road	I-805 NB Ramps	–	48	151	477
	I-805 NB Ramps	I-805 SB Ramps	–	49	155	489
Russell Park Way	Friars Road	Civita Boulevard	–	--	36	115
Camino del Este	Rio San Diego Drive	Camino de la Reina	–	27	87	275
	Camino de la Reina	Camino del Rio North	–	--	63	199
Franklin Ridge Road	Phyllis Place	Via Alta	–	35	109	346
	Via Alta	Civita Boulevard	–	–	59	186
Qualcomm Way	Civita Boulevard	Friars Road WB Ramps	–	31	97	308
	Friars Road WB Ramps	Friars Road EB Ramps	–	60	190	601
	Friars Road EB Ramps	Rio San Diego Drive	–	52	166	524
	Rio San Diego Drive	Camino del Rio North	27	85	269	849
	Camino del Rio North	I-8 WB Ramps	31	97	308	975
	I-8 WB Ramps	I-8 EB Ramps	34	107	338	1,069
	I-8 EB Ramps	Camino del Rio South	–	64	204	644
Texas Street	Camino del Rio South	1,400 feet North of Madison Ave	28	89	281	889
	1,400 feet North of Madison Ave	Madison Avenue	28	89	281	889
	Madison Avenue	Meade Ave	–	–	71	223

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
	Meade Ave	El Cajon Boulevard	–	–	54	169
River Run Drive	Friars Road	Rio San Diego Drive	–	–	–	45
Fenton Parkway	Portofino Driveway	Friars Road	–	–	–	54
	Friars Road	Rio San Diego Drive	–	–	77	245
	Rio San Diego Drive	Del Rio Apartments Driveway	–	–	46	144
	Del Rio Apartments Driveway	New Mission City Street “I”	–	–	46	144
	New Mission City Street “I”	Camino del Rio North	–	–	69	218
Mission City Parkway	Camino del Rio North	Camino del Rio South	–	–	69	218
Northside Drive	Portofino Driveway	Friars Road	–	–	–	56
	Friars Road	Fenton Marketplace Driveway	–	39	123	388
	Fenton Marketplace Driveway	Lowé’s Frontage Road	–	31	97	308
Mission Village Drive	Ronda Avenue	Friars Road WB Ramps	–	64	204	644
	Friars Road WB Ramps	Friars Road EB Ramps	35	109	346	1,094
Rancho Mission Road	Friars Road	San Diego Mission Road	–	32	102	323
	San Diego Mission Road	Camino del Rio North	–	39	123	388
Santo Road	Northern Terminus	Friars Road	–	–	77	245
Riverdale Street	Zion Road	Friars Road	–	–	–	35
	Friars Road	Vandever Avenue	–	42	132	416
Mission Gorge Road	Friars Road	Camino del Rio North	–	35	112	354
Fairmount Avenue	Camino del Rio North/I-8 WB Off-ramp	I-8 EB Off-ramp	34	107	338	1,069
	I-8 EB Off-ramp	Camino del Rio South	59	186	587	1,858
Riverwalk Drive	West of Street “J” Riverwalk Street “J”		–	–	–	66
	Street “J” Riverwalk Street “J”	Fashion Valley Road	–	–	41	32

Table 4.9-6: Future Vehicle Traffic Noise Contour Distances

Roadway	Segment		Distance to Noise Contour (feet)			
	From	To	75 CNEL	70 CNEL	65 CNEL	60 CNEL
	Fashion Valley Road	Avenida del Rio	-	-	52	166
Levi-Cushman Street "B" Riverwalk Street "U"	Street J Riverwalk Street "J"	Fashion Valley Road	-	-	71	223
Goshen Street	Linda Vista Road	Gaines Street	-	-	-	47
	Gaines Street	Friars Road	-	-	-	37
New Mission City Street "J"	Mission City Parkway	Eastern End	-	-	41	129
Gill Village Way	Friars Road	Rio San Diego Drive	-	-	-	63
Rio Bonito Way	Friars Road	Rio San Diego Drive	-	-	-	45

Source: RECON, 2019.

The proposed CPU includes policies that would support site design strategies and noise reduction measures for new development within 500 feet of freeways.² Additionally, policies in the General Plan Noise Element require the reduction of traffic noise exposure because they set standards for the siting of sensitive land uses, while Title 24 requires that projects demonstrate that interior noise levels would be reduced to acceptable levels (45 CNEL or less). General Plan Noise Element policy NE-A.4 requires an acoustical study consistent with the Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines. Future discretionary proposals within the CPU area would therefore be required to conduct site-specific exterior noise analyses to demonstrate that the proposed project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the Land Use - Noise Compatibility Guidelines. ~~Additionally, for all future discretionary and ministerial projects located in areas where exterior noise levels exceed the Land Use - Noise Compatibility Guidelines site specific interior noise analyses demonstrating compliance with the interior noise standards of the General Plan would be required. These requirements for site specific noise analyses would be implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 CNEL. Through implementation of this regulatory framework, exterior traffic noise impacts associated with new discretionary development and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.~~

However, in the case of exterior noise impacts, as noise levels would exceed 60 CNEL throughout the entire CPU area, new development projects could place sensitive receptors in locations where the existing or future exterior noise levels would exceed the Land Use - Noise Compatibility Guidelines. Therefore, exterior noise impacts would remain significant and unavoidable and there are no feasible mitigation measures available. ~~associated with ministerial projects, there is no~~

² See Policies for Development RES-5, NOI-1, and FAD-4.

~~procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas where the noise level exceeds the applicable land use and noise compatibility level would be significant. As there is no procedure to ensure that exterior noise is adequately attenuated for ministerial projects, no feasible mitigation measures are available and impacts would remain significant and unavoidable.~~

Trolley Noise

Figure 4.9-4 shows the existing noise contours for the Green Line Trolley operations. Future Green Line Trolley operations are anticipated to continue similar to the existing schedule and noise contours at buildout would be the same as the existing. The 60, 65, and 70 CNEL noise contour distances for the Green Line Trolley are summarized in Table 4.9-7. As shown, the 60 CNEL contour extends up to approximately 272 feet from the center of the trolley tracks between the Stadium and Fenton Parkway trolley stations, and the 65 CNEL contour extends up to approximately 86 feet of the trolley tracks.

Proposed CPU policy NOI-2 supports the use of site planning techniques and landscaping for new development to help minimize the exposure of noise sensitive uses to trolley line noise. Additionally, the General Plan Noise Element contains policies to minimize excess train horn noise through the establishment of train horn “quiet zones.” Quiet zones are allowed by the federal government through implementation of safety measures to compensate for the loss of train horn usage.

Table 4.9-7: Green Line Trolley Noise Contour Distances

Stations	Noise Level at 50 feet (CNEL)	Distance to Noise Contour (feet)		
		70 CNEL	65 CNEL	60 CNEL
Grantville to Mission San Diego	63	10	33	105
Mission San Diego to Stadium	58	3	10	32
Stadium to Fenton Parkway	67	27	86	272
Fenton Parkway to Rio Vista	64	12	37	117
Rio Vista to Mission Valley Center	63	10	33	105
Mission Valley Center to Hazard Center	63	10	33	105
Hazard Center to Fashion Valley	61	7	22	68
Fashion Valley to Morena/Linda Vista	64	13	41	130
Morena/Linda Vista to Old Town	63	10	33	105

Note:

Calculation data provided in Attachment 3 of the Noise Analysis.

Source: RECON, 2019.

The nearest noise-sensitive land uses would be located on both sides of the trolley alignment, with some uses abutting the right-of-way at distances as close as 25 feet from the centerline. Although noise-sensitive land uses would be in close proximity to the trolley tracks, vehicle traffic noise along the freeways would exceed 60 CNEL in the entire CPU area. The vehicle traffic noise would exceed the contribution of noise from trolley operations. However, although vehicle traffic would be the dominant noise source, trolley noise levels in close proximity to the tracks would contribute to the

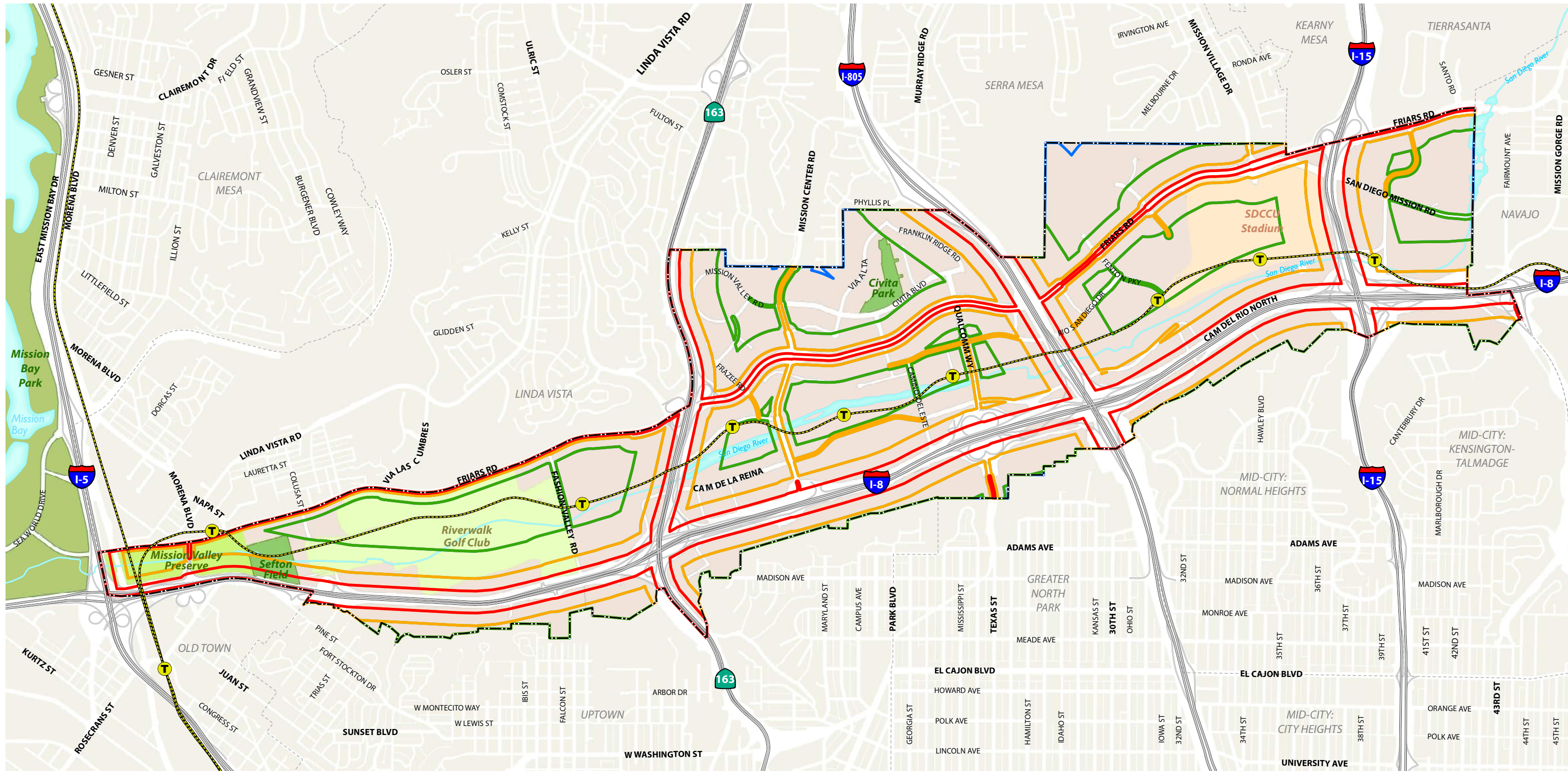
overall exterior noise level, and the combined vehicle traffic and trolley exterior noise levels could exceed the Land Use – Noise Compatibility Guidelines. ~~As discussed above, future discretionary proposals within the CPU area would be required to conduct site-specific exterior noise analyses to demonstrate that the proposed project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the Land Use – Noise Compatibility Guidelines. However, in the case of exterior noise impacts associated with ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial~~ New and existing development projects located in areas where the noise level exceeds the applicable land use and noise compatibility level may not be able to adequately attenuate exterior noise, therefore exterior noise impacts would be significant.

As discussed above, interior noise impacts for new development ~~both discretionary and ministerial projects~~ would be less than significant because building permit applicants must demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report. Therefore, interior noise impacts resulting from trolley operations would be less than significant.

The future Mid-Coast Trolley extension (Blue Line Trolley) is currently under construction along the western CPU boundary. Once constructed, this trolley extension would provide trolley service from the Old Town Transit Center to the University of California, San Diego and University Town Center along the rail corridor parallel to I-5. The closest station to the CPU area would be located at West Morena Boulevard and Tecolote Road. Sound level distances from future San Diego MTS Trolley service were derived from SANDAG's Noise and Vibration Impacts Technical Report for the Mid-Coast Corridor Transit Project (SANDAG 2014). Freight and passenger train noise levels were based on Amtrak, Coaster, and freight train assumptions provided by the Los Angeles–San Diego–San Luis Obispo (LOSSAN) Rail Corridor Agency (LOSSAN 2012). Based on these studies, it is anticipated that rail traffic would generate a noise level of 60 CNEL at approximately 270 feet from the railway centerline. However, no sensitive land uses exist or are proposed in the CPU area adjacent to the Blue Line Trolley extension. The area adjacent to the tracks is designated Open Space (San Diego River). Additionally, noise levels in the vicinity of the western CPU boundary are dominated by vehicle traffic noise from I-5 and I-8. There would be no noise impacts due to future Blue Line Trolley operations. The Mid-Coast Corridor Transit Project noise analysis also found noise impacts in this area to be less than significant (SANDAG 2014).

The Regional Plan's planned Purple Line Trolley would provide a new north-south transit connection through the Stadium Specific Plan area and would generally parallel to I-15. It is anticipated that noise levels due to future Purple Line Trolley operation would be similar to noise levels from the Blue and Green Line Trolleys. Noise levels along I-15 would exceed 70 and 75 CNEL along the future Purple Line Trolley. As with the Blue and Green Line Trolleys, vehicle traffic noise would exceed the contribution of noise from trolley operations. However, the exact alignment of the Purple Line Trolley is not known at this time, and it could be located in close proximity to noise sensitive land uses. As with the Green Line Trolley, although vehicle traffic would be the dominant noise source, trolley noise levels in close proximity to the tracks would contribute to the overall exterior noise level, and the combined vehicle traffic and trolley exterior noise levels could exceed the Land Use – Noise Compatibility Guidelines, resulting in a significant impact.

Figure 4.9-2: Noise Contours (2018)



	Trolley Stops		Lakes/Ponds/Bays	Traffic Noise Contours	
	Light Rail		Parks		60 CNEL
	Freeways		Mission Valley Community Plan Boundary		65 CNEL
	Ramps		Community Planning Areas		70 CNEL
	Streams/Creeks				75 CNEL

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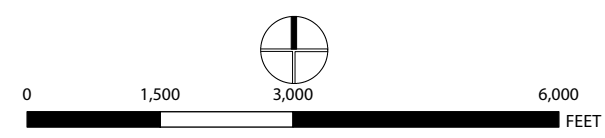
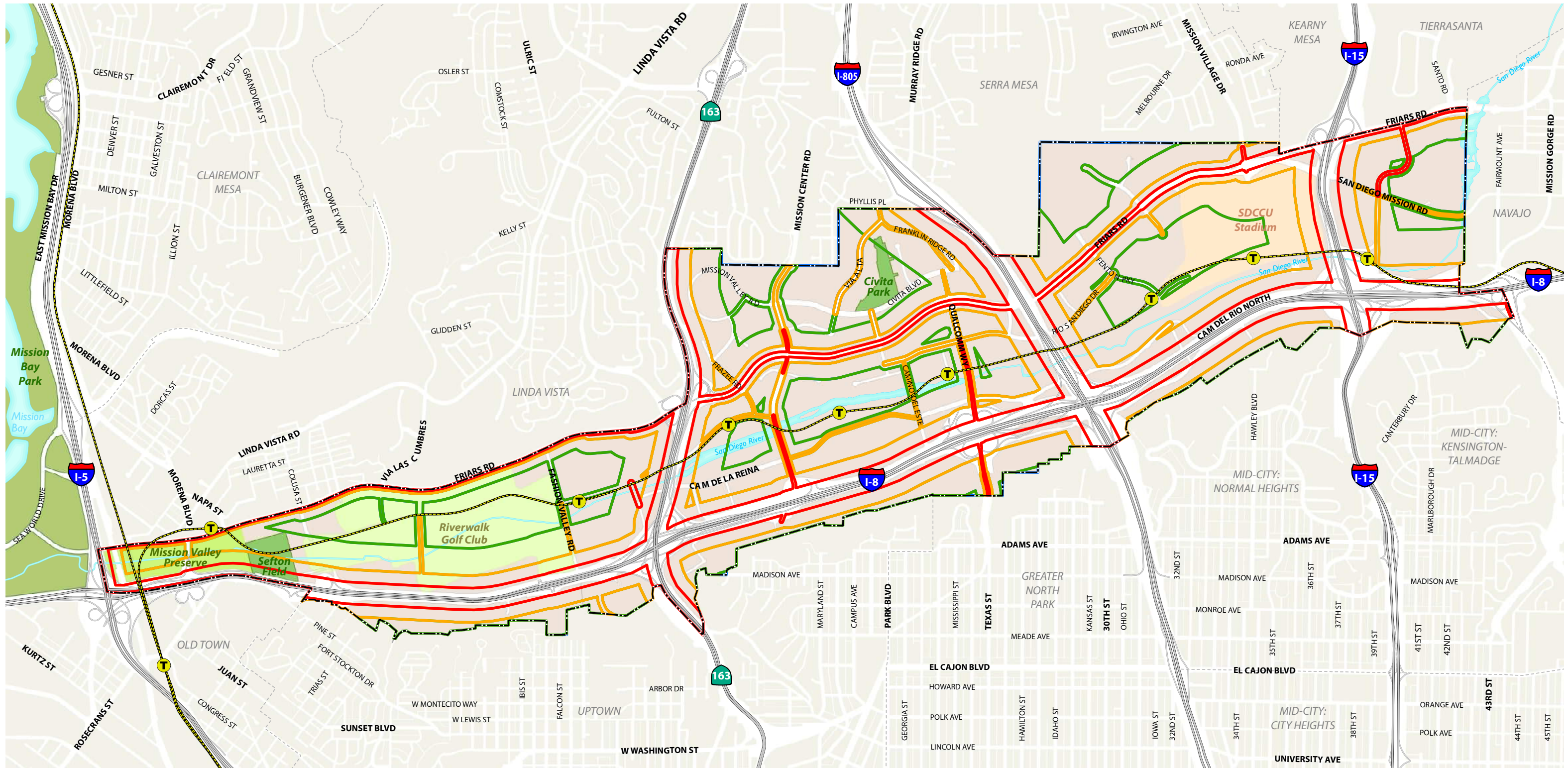


Figure 4.9-3: Noise Contours (2050)



	Trolley Stops		Lakes/Ponds/Bays	Traffic Noise Contours	
	Light Rail		Parks		60 CNEL
	Freeways		Mission Valley Community Plan Boundary		65 CNEL
	Ramps		Community Planning Areas		70 CNEL
	Streams/Creeks				75 CNEL

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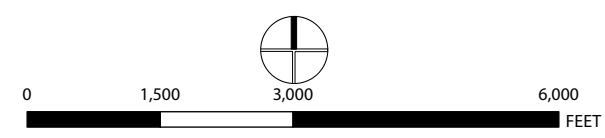
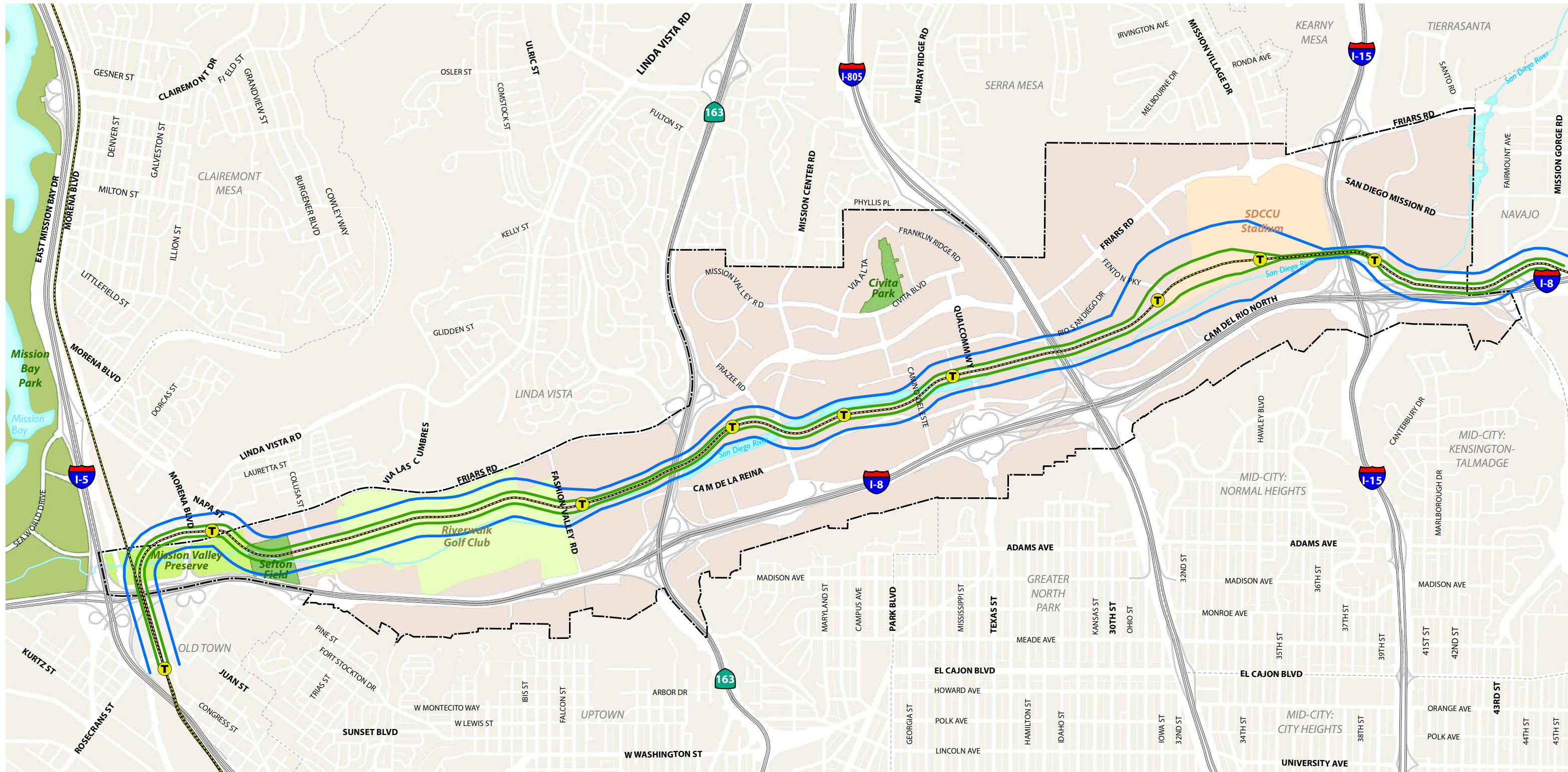
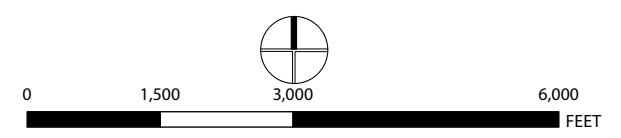


Figure 4.9-4: Green Line Trolley Noise Contours (2018)



	Trolley Stops		Lakes/Ponds/Bays	Trolley Noise Contours	
	Light Rail		Parks		60 CNEL
	Freeways		Mission Valley Community Plan Boundary		65 CNEL
	Ramps		Community Planning Areas		
	Streams/Creeks				

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Mitigation Measures

For future noise sensitive land uses, while some projects may adequately attenuate exterior noise, there could still be new noise sensitive land uses that would experience ambient noise levels that exceed the applicable Land Use – Noise Compatibility Guidelines. Therefore, impacts would be significant and unavoidable.

Impact 4.9-3: Airport Noise

Would the proposed CPU result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?

A significant impact could occur if implementation of the proposed CPU would result in land uses that are not compatible with aircraft noise levels as defined by an adopted ALUCP. Generally, noise sensitive land uses are compatible with aircraft noise levels up to 60 CNEL. Aircraft noise is evaluated based on the noise contours developed by the San Diego County Regional Airport Authority and provided in the Airport Land Use Compatibility Plans (San Diego County Regional Airport Authority 2010 and 2014). The aircraft noise contours are based on year 2030 forecast noise exposure.

The San Diego International Airport (SDIA) is located approximately 1.5-miles south of the CPU area. The western portion of the CPU area is located within SDIA's Airport Influence Area (AIA) Review Area 2, and no portion of the CPU area is located within the 60 CNEL noise contour for the SDIA. Noise levels due to aircraft operations at the SDIA would be less than 60 CNEL, and impacts would be less than significant.

Montgomery Field is located approximately 1.5 miles north of the CPU area. The CPU area is located within Montgomery Field's AIA Review Area 2; however, the entire CPU area is located well outside the 60 CNEL noise contour. Noise levels due to aircraft operations at Montgomery Field would be less than 60 CNEL, and impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.9-4: San Diego Municipal Code – On-Site Generated Noise

Would the proposed CPU result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?

A significant impact could occur if implementation of the proposed CPU resulted in the exposure of people to noise levels that exceed property line limits established in the Noise Abatement and Control Ordinance of the SDMC. Section 59.5.0401 of the SDMC specifies maximum one-hour average sound level limits at the boundary of a property. These maximum one-hour sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries due to activities occurring on the property. Stationary sources of noise include activities associated with a given land use. For example, noise sources from commercial land uses would include car washes, fast food restaurants, auto repair facilities, parking lots, and a variety of other uses.

Implementation of the proposed CPU would result in pedestrian-oriented mixed-use areas and areas where residential uses could be located in proximity to commercial sites that could expose sensitive receptors to additional noise. The noise associated with these types of land uses is generally produced by pedestrian traffic, parking lot activity, and public gatherings, but could also include loading docks, mechanical equipment (such as HVAC equipment and generators), deliveries, trash-hauling activities, and customer and employee use of commercial facilities. Noise generated by residential or commercial uses is generally short-lived and intermittent, while noise generated by auto-oriented commercial and industrial uses is usually sporadic, highly variable, and spatially distributed.

The land uses proposed by the CPU would be similar to the land uses that currently exist in the CPU area, although with greater density. Because noise levels in the CPU area are dominated by vehicle traffic on freeways and heavily traveled area roadways, noise levels from stationary sources throughout the CPU area would not be expected to increase the hourly or daily average sound level with respect to current conditions. While noise-sensitive residential land uses would be exposed to noise associated with the operation of commercial uses, future projects would be required to show compliance with the Noise Abatement and Control Ordinance to ensure noise compatibility between various land uses. The City regulates specific noise level limits allowable between land uses including the requirement for noise studies, limits on hours of operation for various noise-generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. Through enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.9-5: San Diego Municipal Code – Construction Noise

Would the proposed CPU result in the exposure of people to significant temporary construction noise?

A significant impact could occur if implementation of the proposed CPU resulted in the exposure of people to significant temporary construction noise. Future development implemented under the proposed CPU could result in a temporary ambient noise increase due to construction activities.

Although no specific construction or development is proposed at this time, construction noise impacts could occur as future development within the CPU area occurs. Due to the developed nature of the CPU area, there is a high likelihood that construction activities would take place adjacent to existing structures and that sensitive receptors would be located in proximity to construction activities.

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition; land clearing, grading, and excavation; erection). Construction noise would be short term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and the use of power tools. Noise would also be generated by construction equipment use, including earthmovers, material handlers, and portable generators, and could reach high noise levels for brief periods.

As discussed in Section 4.9.2.2, hourly average noise levels would be approximately 83 dB(A) L_{eq} at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. Noise levels would vary depending on the nature of the construction activities including the duration of specific activities, the equipment involved, the location of the sensitive receivers, and the presence of intervening barriers. Construction noise levels of 83 dB(A) L_{eq} at 50 feet would attenuate to 75 dB(A) L_{eq} at 120 feet. Therefore, significant impacts could occur if sensitive land uses are located closer than 120 feet of construction activities.

The City regulates construction noise through its Noise Abatement and Control Ordinance, which puts limits on the days of the week and hours of operation allowed for construction. The City also imposes requirements for building and grading permits related to construction noise. However, there is also a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the highly developed nature of the CPU area with sensitive receptors potentially located in proximity to construction sites, there is a potential for the construction of future projects to expose existing sensitive receptors to significant noise levels. This would result in a potentially significant impact.

Mitigation Measures

The following mitigation measure would be implemented to address potential construction noise impacts:

- MM-NOS-1:** Future discretionary projects within the CPU area shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in the contractor specifications and shall include, but not be limited to, the following:
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
 - Locate stationary noise-generating equipment (e.g., compressors) as far as possible from adjacent residential receivers.
 - Acoustically shield stationary equipment located near residential receivers with temporary noise barriers.
 - Utilize "quiet" air compressors and other stationary noise sources where technology exists.
 - The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
 - Designate a "disturbance coordinator" who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem.

Implementation of MM-NOS-1 would reduce construction-related noise impacts for future discretionary projects implemented under the proposed CPU. ~~However, in the case of ministerial projects, there is no procedure to ensure that construction related noise impacts are mitigated.~~ Even with implementation of MM-NOS-1, significant construction noise impacts may still occur because it is not feasible to ensure and enforce implementation for all projects developed per the proposed CPU. ~~therefore~~ Therefore, this impact would be significant and unavoidable.

Impact 4.9-6: Vibration

Would the proposed CPU result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

As discussed, potential sources of ground-borne vibration could occur as a result of railway operations. For frequent events such as trolley operations, a vibration level of 65 VdB or less at buildings where vibration would interfere with interior operations (Category 1), a vibration level of 72 VdB or less at residential uses and places where people normally sleep (Category 2), and a vibration level 75 VdB or less at institutional uses with primarily daytime use (Category 3) would be considered acceptable (FTA 2018).

There are no Category 1, 2, or 3 land uses located within 600 feet of the right-of-way of the railway located at the western CPU boundary. Additionally, the Mid-Coast Corridor Transit Project noise and vibration analysis also found vibration impacts in this area to be less than significant (SANDAG 2014).

The east-west Green Line Trolley bisects the CPU area, however, no freight trains or larger commuter trains utilize this railway. Vibration levels were calculated using FTA methodology. Vibration levels are a function of trolley speed and distance to the nearest structure, among other factors. Table 4.9-8 summarizes the trolley vibration screening distances. As discussed, portions of the Green Line Trolley tracks are on elevated structures and do not cause significant vibration impacts to adjacent development. Areas where noise- and vibration-sensitive uses are located the closest to the tracks (as close as 25 feet) are at the existing trolley stations. Because all trolleys stop at each station, trolley speeds approaching and departing from the stations would be very low and would not cause significant vibration levels over existing levels. These screening distances are therefore conservative.

Table 4.9-8: Trolley Vibration Screening Distances

Trolley Speed (mph)	Vibration Level at 25 Feet (VdB)	Distance to (feet)		
		75 VdB (Category 3)	72 VdB (Category 2)	65 VdB (Category 1)
15	67	1	9	33
20	70	6	14	48
25	72	11	21	63
30	73	16	28	77
35	74	21	35	90
40	76	26	42	102
45	77	31	49	114
50	78	36	55	125
55	78	41	62	136
60	79	45	68	147

Source: RECON, 2019.

As discussed, the future Purple Line Trolley would run through the Stadium Specific Plan area. The exact alignment is not known at this time, however, vibration impacts and screening distances for the Purple Line Trolley are anticipated to be the same as those for the Green Line Trolley.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

4.10 Paleontological Resources

This section analyzes the potential impacts to paleontological resources due to implementation of the proposed CPU. It documents the geological setting of the CPU area (see Section 4.3: Geology, Soils, and Seismicity for further detail) and provides a description of relevant State and local regulations related to paleontological resources. The following analysis is based on a review of available literature, including the City of San Diego's (City's) General Plan, geological mapping based on Kennedy and Tan, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (2016).

4.10.1 Environmental Setting

4.10.1.1 PHYSICAL SETTING

Regional Paleontological History

Paleontological resources, also referred to as fossils, are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits, or formations, in which they were originally buried. Paleontological resources represent limited, non-renewable, and sensitive scientific and educational resources.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation. To evaluate paleontological resources in the CPU area, the presence and distribution of geologic formations and the respective potential for paleontological resources to occur were evaluated.

The city is underlain by numerous distinct geologic units (i.e., formations) that record portions of the past 450 million years of Earth's history. Over this period of time, the relationship between land and sea has fluctuated drastically, such that today there are ancient marine rocks preserved up to elevations about 900 feet above sea level. In general, time periods late in geologic history are better represented than periods further back in time because the younger rocks are less likely to have been eroded away or metamorphosed. This is the case in San Diego County where a general overview of the geologic setting provides a basis for reasonably predicting the location of paleontological resources. In the city, the geologic record is mostly complete for parts of the past 75 million years, represented by the Cretaceous Period, the Eocene, Oligocene, and Pliocene Epochs of the Tertiary Period, and the Pleistocene Epoch of the Quaternary Period.

Levels of Paleontological Resource Sensitivity

The City’s CEQA Significance Determination Thresholds (2016) establishes a Paleontological Monitoring Determination Matrix provided in Table 4.10-1, which identifies geological deposits, formations, and rock units in the city and describes the potential fossil localities and sensitivity ratings associated with each formation. The sensitivity of the paleontological resource determines the significance of a paleontological impact, described as follows:

- **High Sensitivity.** High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity.** Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations judged to have a strong, but unproven potential for producing important fossil remains.
- **Low Sensitivity.** Low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations produce invertebrate fossil remains in low abundance.
- **Zero Sensitivity.** Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains, or to artificial fill materials that lose the stratigraphic/geologic context of any contained organic remains (e.g., fossils).

Table 4.10-1: Paleontological Monitoring Determination Matrix

<i>Geological Deposit/Formation/ Rock Unit</i>	<i>Potential Fossil Localities</i>	<i>Sensitivity Rating</i>
Alluvium (Qsw, Qal, or Qls)	All communities where this unit occurs	Low
Ardath Shale (Ta)	All communities where this unit occurs	High
Bay Point/Marine Terrace (Qbp) ¹	All communities where this unit occurs	High
Cabrillo Formation (Kcs)	All communities where this unit occurs	Moderate
Delmar Formation (Td)	All communities where this unit occurs	High
Friars Formation (Tf)	All communities where this unit occurs	High
Granite/Plutonic (Kg)	All communities where this unit occurs	Zero
Lindavista Formation (Qln, Qlb) ²	A. Mira Mesa/Tierrasanta B. All other areas	A. High B. Moderate

Table 4.10-1: Paleontological Monitoring Determination Matrix

Geological Deposit/Formation/ Rock Unit	Potential Fossil Localities	Sensitivity Rating
Lusardi Formation (Kl)	A. Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe B. All other areas	A. High B. Moderate
Mission Valley Formation (Tmv)	All communities where this unit occurs	High
Mt. Soledad Formation (Tm, Tmss, Tmsc)	A. Rose Canyon B. All other areas	A. High B. Moderate
Otay Formation (To)	All communities where this unit occurs	High
Point Loma Formation (Kp)	All communities where this unit occurs	High
Pomerado Conglomerate (Tp)	A. Scripps Ranch/Tierrasanta B. All other areas	A. Moderate B. Zero
River/Stream Terrace Deposits (Qt)	A. South Eastern/Chollas Valley/Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro B. All other areas	A. Moderate B. Low
San Diego Formation (Qsd)	All communities where this unit occurs	High
Santiago Peak Volcanics (Jsp) A. Metasedimentary B. Metavolcanic	A. Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/Penasquitos B. All other areas	A. Moderate B. Zero
Scripps Formation (Tsd)	All communities where this unit occurs	High
Stadium Conglomerate (Tst)	All communities where this unit occurs	High
Sweetwater Formation	All communities where this unit occurs	High
Torrey Sandstone (Tf)	A. Black Mountain Ranch/Carmel Valley B. All other areas	A. High B. Low
Sensitivity Rating	Grading Thresholds for Required Monitoring	
High =	> 1,000 cubic yards and 10 feet+ deep	
Moderate =	> 2,000 cubic yards and 10 feet+ deep	
Zero – Low =	Monitoring not required	
Notes:		
1. Baypoint – Broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature.		
2. Lindavista – Broadly correlative with Qvop 1-13 of Kennedy and Tan (2008) new mapping nomenclature.		
Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.		
Monitoring may be required for shallow grading (i.e. <10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.		
Monitoring is not required when grading documented or undocumented artificial fill.		

Source: City of San Diego, 2016.

Geologic Formations in the CPU Area

Geologic formations in the CPU area are shown in Figure 4.3-1 of Section 4.3: Geology, Soils, and Seismicity.

Bay Point Formation (Qop6)

The Bay Point Formation represents a nearshore marine to onshore fluvial sedimentary deposit of middle to late Pleistocene age (700,000 to 10,000 years old). Typical exposures consist of light gray, friable to partially cemented, fine- to coarse-grained, massive to cross-bedded sandstone. This rock unit includes marine-terrace deposits, as well as valley-fill deposits, and, in some cases, river-terrace deposits. The Bay Point Formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils, primarily mollusks, from many localities in the metropolitan San Diego area. Remains of fossil marine vertebrates (e.g., sharks, rays, and bony fishes) and terrestrial mammals (e.g., horse, camel, deer, mastodon, and mammoth) have also been recovered from this rock unit.

Friars Formation (Tf)

The Friars Formation consists mainly of sandstones, siltstone, mudstones, and cobble conglomerate. It is rich in vertebrate fossils, especially terrestrial mammals such as primates, rodents, artiodactyls, and perissodactyls. Well-preserved remains of marine microfossils and macroinvertebrates, and remains of fossil leaves have been recovered from the Friars Formation.

Mission Valley Formation (Tmv)

The Mission Valley Formation is the only Eocene rock unit in southern California to have a radiometric date directly associated with fossil mammal localities. The marine strata of the Mission Valley Formation have produced abundant and generally well-preserved remains of marine microfossils, macroinvertebrates, and vertebrates. Fluvial strata of the formation have produced well-preserved examples of petrified wood and fairly large and diverse assemblages of fossil land mammals. The fact that marine microfossils and land mammals occurred at the same time is extremely important, as it allows for the direct correlation of terrestrial and marine faunal time scales. The Mission Valley Formation represents one of the few instances in North America where such comparisons are possible, and it is assigned high paleontological resource sensitivity. The formation crops out discontinuously from Otay Valley in the south to at least Miramar Reservoir in the north, and from Old Town in the west to Spring Valley, El Cajon Valley, and Santee in the east.

San Diego Formation (Qsd)

The San Diego Formation is a marine sedimentary deposit consisting of rich fossil beds that have yielded extremely diverse assemblages of marine organisms. In addition, rare remains of terrestrial mammals and fossil wood and leaves have been recovered here. This diverse group of fossils represents one of the most important sources in the world of information on Pliocene marine organisms and environments. The formation is exposed extensively from Otay Mesa and Otay Ranch to Mission Valley, with isolated occurrences stretched out along the Rose Canyon Fault Zone

at Tecolote Canyon, Balboa Avenue, Rose Canyon, and all along the southern slopes of Mount Soledad from Interstate 5 to the sea cliffs at Pacific Beach.

Stadium Conglomerate (Tst)

The Stadium Conglomerate is made up of two conglomeratic units that are distinct both with regard to the time period of formation and to the composition of the formation. Because of the diverse and well-preserved fossil remains found in this formation, its level of sensitivity has been determined to be high. Where it occurs in Murphy Canyon, there have been sparse, but well-preserved remains of rhinoceros, primates, and small mammals.

Low and Zero Sensitivity Formations

Low sensitivity is assigned to young alluvial floodplain deposits as these deposits are considered to have little potential to yield scientifically significant fossils. However, on occasion, deeper excavations into sedimentary deposits mapped as younger alluvium do yield fossils. Alluvial deposits in the CPU area include:

- **Qya – Young alluvial flood-plain deposits (Holocene and late Pleistocene).** Young alluvial floodplain deposits are characterized as poorly consolidated, poorly sorted, permeable floodplain deposits of sandy, silty, or clay-bearing alluvium. These deposits occur along the floodplain of the San Diego River down the central axis of Mission Valley.
- **Qyc – Young colluvial deposits (Holocene and late Pleistocene).** These consist of young poorly consolidated and poorly sorted sand and silt slopewash deposits and are mapped throughout the CPU area (dominantly on the south side of the valley).
- **Qoa – Old alluvial flood-plain deposits (late to middle Pleistocene).** These are dominantly fluvial sediments deposited on canyon floors consisting of moderately well consolidated, poorly sorted, permeable, commonly slightly dissected gravel, sand, silt, and clay-bearing alluvium. These deposits are present in portions of the eastern side of the valley (near the Stadium).

Much of the CPU area is mapped as being underlain by artificial fill (af). Fill materials presumably were derived from earlier construction activities and were placed in such a way as to provide topographically high areas for current and future development. No fossils of paleontological interest are located in artificial fill materials. Any contained organic remains have lost their original stratigraphic/geologic context due to the disturbed nature of the artificial fill materials. Artificial fill materials are assigned a zero sensitivity rating due to the loss of the stratigraphic/geologic context of any contained organic remains (e.g., fossils).

4.10.1.2 REGULATORY SETTING

State Regulations

California Environmental Quality Act

Pursuant to Section 15065 of the CEQA Guidelines (California Code of Regulations [CCR] Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment when the project has the potential to eliminate important examples of the major periods of California prehistory, including significant paleontological resources. The City’s CEQA Significance Determination Thresholds (2016) are used to make this determination.

California Public Resources Code

Public Resources Code Section 5097.5 states that a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

Local Regulations

City of San Diego Municipal Code

The City’s Land Development Code (San Diego Municipal Code [SDMC] Chapter 11 through 15) provides detailed development regulations which include regulations related to grading and paleontological monitoring. SDMC Section 142.0151 requires paleontological resources monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

1. Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
2. Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
3. Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources are discovered during grading, all grading in the area of discovery is required to cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources. The General Grading Guidelines for Paleontological Resources are found in Appendix P of the Land Development Manual and do not replace the Significance Determination Thresholds set forth in Land Development Manual Appendix A for Paleontological Resources.

4.10.2 Impact Analysis

4.10.2.1 SIGNIFICANCE CRITERIA

The City's CEQA Significance Determination Thresholds provides guidance for determining the potential significance of paleontological resources. Based on the City's thresholds, a significant impact to paleontological resources could occur if the proposed CPU would result in development that requires:

- Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
- Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Determination Thresholds includes a Paleontological Monitoring Determination Matrix (see Table 4.10-1 above). Additionally, the thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

4.10.2.2 METHODOLOGY AND ASSUMPTIONS

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular formations make it possible to predict where fossils will or will not be encountered. This analysis is based on a review of the Geologic Map of the San Diego Quadrangle (Kennedy and Tan, 2008) and the City's CEQA Significance Determination Thresholds (City of San Diego, 2016).

4.10.2.3 IMPACTS

Impact 4.10-1: Paleontological Resources

Would the proposed CPU result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

The CPU area is underlain by five geologic formations that are considered to be of high sensitivity for paleontological resources: the Bay Point Formation, Friars Formation, Mission Valley Formation, San Diego Formation, and Stadium Conglomerate. Future development projects implemented under the proposed CPU that would involve excavation into the underlying geological formations could expose these formations and associated fossil remains. These

development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified could also result in a significant impact. While much of the CPU area is underlain by artificial fill with no potential to uncover paleontological resources, the above-mentioned formations have high resource sensitivity where fossils could be uncovered during future construction-related activities. Buildout of future projects would likely result in a certain amount of disturbance to the native bedrock within the CPU area. Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the San Diego Municipal Code, would ensure that impacts to paleontological resources would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no additional mitigation measures are required.

4.11 Public Services and Facilities

This section provides an analysis of the potential significant impacts to public services and facilities due to the implementation of the proposed CPU. Issues addressed include police protection, fire/life safety protection, schools, libraries, and parks and recreation facilities. This section describes the existing conditions, as well as relevant plans, policies, and regulations.

4.11.1 Environmental Setting

4.11.1.1 PHYSICAL SETTING

Public Safety

Police Protection

Police services in the CPU area are provided by the San Diego Police Department (SDPD). The SDPD groups neighborhoods in the city into nine divisions. The portion of the CPU area west of State Route (SR-) 163 is part of the Western Division, which in total serves a population of about 129,700 people and encompasses 22.7 square miles (City of San Diego, 2017a). The Western Division station is located at 5215 Gaines Street, immediately north of Friars Road (City of San Diego, 2018a). This station is located just outside the northern boundary of the CPU area in the Linda Vista Community Plan area. The Western Division station is staffed with 81 sworn personnel and two civilian employees (City of San Diego, 2017a).

The portion of the CPU area east of SR-163 is part of the Eastern Division, which in total serves a population of about 155,900 people and encompasses 47.1 square miles (City of San Diego, 2017b). The Eastern Division station is located at 9225 Aero Drive in the Serra Mesa Community Plan area (City of San Diego, 2017b). The Eastern Division is currently staffed with 76 sworn personnel.

The service goal for police services across the entire SDPD service area is to maintain a ratio of 1.48 sworn officers per 1,000 residents (AECOM, 2018). As of 2018, the ratio across the entire service area was 1.3 sworn officers per 1,000 residents, based on the 2016 estimated residential population of about 1,391,700 (AECOM, 2018). Based on a population of 129,700 people and 81 sworn officers, the Western Division, as of 2017, had a service ratio of 0.62. Based on a population of about 155,900 people and 76 sworn officers, the Eastern Division, as of 2017, had a service ratio of 0.48.

SDPD's citywide response time goals are 7 minutes for emergency calls, 12 minutes for Priority 1 calls, 30 minutes for Priority 2 calls, 90 minutes for Priority 3 calls, and 90 minutes for Priority 4 calls (AECOM, 2018). As of 2016, the Western Division's average response times were 6.1 minutes

for emergency calls, 11.8 minutes for Priority 1 calls, 30 minutes for Priority 2 calls, 83.1 minutes for Priority 3 calls, and 156 minutes for Priority 4 calls. The Western Division meets the citywide response time goals for Priority 1 calls, Priority 2 calls, and Priority 3 calls, but not for Priority 4 calls. As of 2016, the Eastern Division's average response times were 8.2 minutes for emergency calls, 18 minutes for Priority 1 calls, 45 minutes for Priority 2 calls, 102.7 minutes for Priority 3 calls, and 177 minutes for Priority 4 calls. The Eastern Division does not meet any citywide response time goals.

Fire/Life Safety Protection

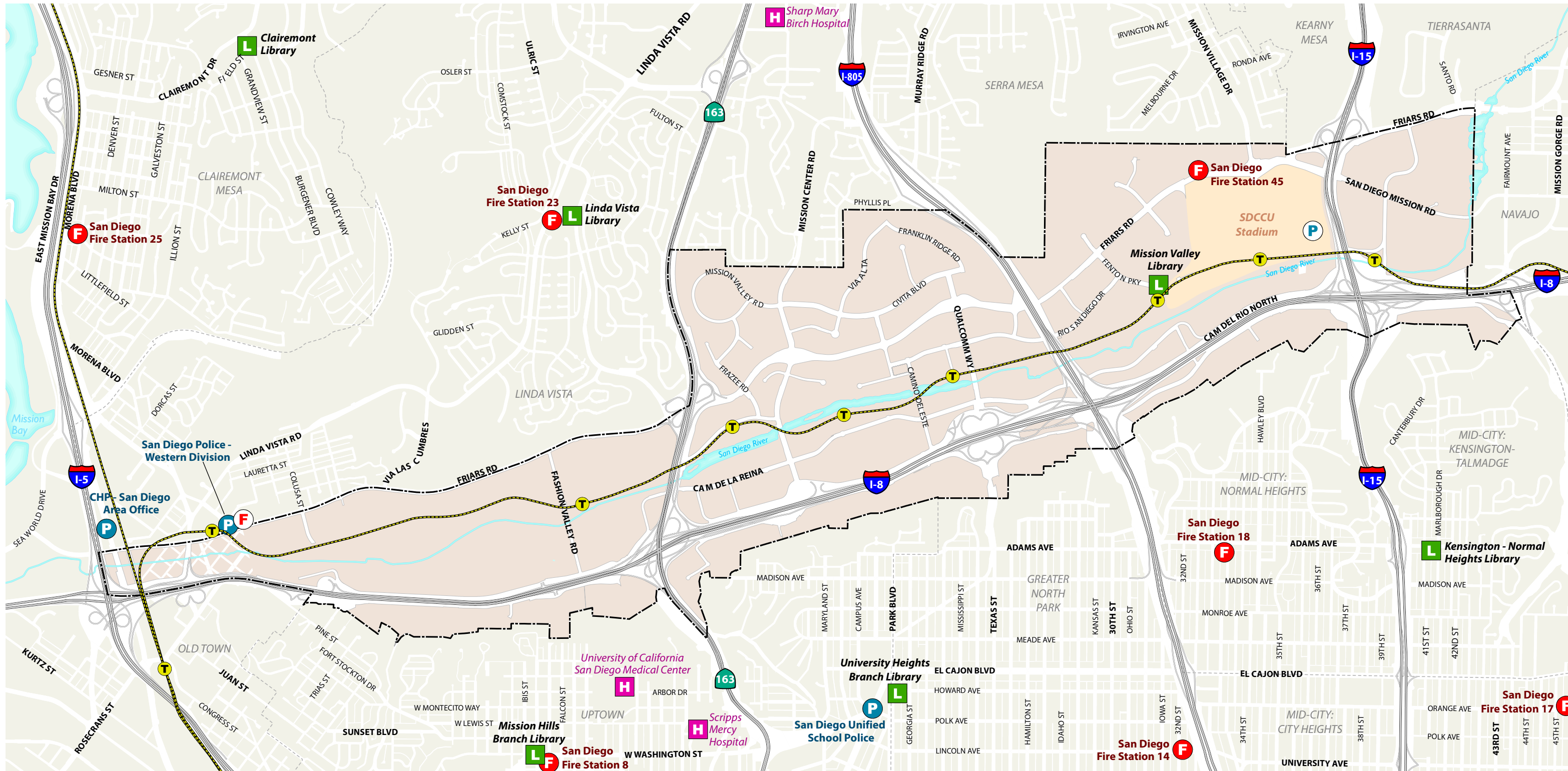
The City of San Diego's Fire-Rescue Department (SDFD) provides fire, emergency medical, lifeguard, and emergency management services for the CPU area. SDFD serves a population of about 1.4 million people over a geographic area of about 343 square miles (City of San Diego, 2018a). SDFD provides emergency/rescue services and hazard prevention and safety education to ensure the protection of life, property, and the environment. This includes education for property owners about managing brush to protect properties from wildfires. There is one fire station (Fire Station 45) within the CPU area, as shown in Figure 4.11-1. Fire Station 45 is located near the intersection of Friars Road and Mission Village Drive at 9366 Friars Road.

Mission Valley is located in fire service zones 2, 3, and 4. Fire Station 45 has a hazardous materials apparatus, one fire engine, and one aerial truck (City of San Diego, 2018b). Fire Stations 5, 17, 18, 20, 23, 25, and 28 are located outside the CPU area but provide service within portions of the CPU area. As of 2017, the City is not planning to construct new stations in the CPU area (Citygate Associates, 2017).

The City of San Diego has established a first-due unit response time of 7.5 minutes for medical emergencies and small fires, 90 percent of the time from the receipt of the 911 call in fire dispatch (Citygate Associates, 2017). This equates to a one-minute dispatch time, 1.5-minute company turnout time, and five-minute travel time in the most populated areas of the city (Citygate Associates, 2017). As of 2016, Fire Station 45 had an average travel time of about seven minutes, above the five-minute goal (Citygate Associates, 2017). Across the entire city, only four out of 47 stations met the five-minute travel time goal (Citygate Associates, 2017); none of these stations serve the CPU area. As of 2016, Fire Station 45 had an average dispatch and crew turnout time of about nine minutes from the time of the 911 call to the time of arrival – above the City's established goal of 7.5 minutes (Citygate Associates, 2017). Citywide, only seven out of 47 stations met this goal (Citygate Associates, 2017); none of these stations serve the CPU area.

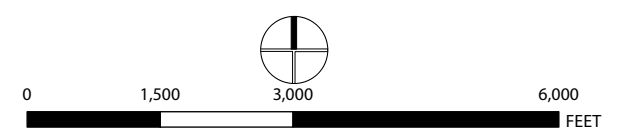
Emergency medical services are provided to the CPU area and throughout the city through a public/private partnership between the City's Emergency Medical Services (EMS) and Rural Metro Corporation, which provides additional personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Calls are prioritized from Level 1 (most serious) to Level 4 (non-emergency).

Figure 4.11-1: Existing and Planned Public Service Facilities



- T Trolley Stops
- F Existing Fire Stations
- L Public Library
- █ Lakes/Ponds/Bays
- Light Rail
- F Planned Fire Station
- H Hospital
- █ Mission Valley Community Plan Boundary
- Freeways
- P Existing Police Stations
- █ Community Planning Areas
- Ramps
- P Planned Police Station*
- Streams/Creeks
- P * Location is approximate.

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Schools, Libraries, and Community Centers

K-12 Schools

The CPU area is served by the San Diego Unified School District (SDUSD) and many private, charter, and special education schools in and surrounding Mission Valley. All public schools that serve Mission Valley are located outside of the CPU area (see Figure 4.11-2). Thus, all public school students who live in the CPU area travel outside of the community to attend school. Students opting for private and special education may be able to attend school within Mission Valley. There are two pre-K to 8th grade private schools (Warren-Walker School and Nazareth School of San Diego) and two special education schools (Cook Education Center and Children's Workshop) in the CPU area.

The SDUSD schools that serve the CPU area have seen a decrease in student enrollment in recent years. Most public schools serving the CPU area have decreased enrollment by at least 10 percent between the 2007-2008 and 2016-2017 school years, resulting in a sizeable amount of excess capacity in schools in the area. Table 4.11-1 shows the total student enrollment of public schools serving the Mission Valley community, which includes enrolled students outside of the CPU area.

In 2017, SDUSD prepared an addendum to the Quarry Falls EIR proposing a new technology-oriented elementary school to be located at the intersection of Via Alta and Civita Boulevard within the CPU area (Placeworks, 2017). Per the Quarry Falls EIR addendum, the school would educate children in grades pre-K through 5th grade and accommodate up to 500 students and a staff of up to 40 (Placeworks, 2017). As of 2018, SDUSD is still in the process of planning the new school (San Diego Unified School District, 2018).

Public Libraries

Mission Valley is served by the Mission Valley Branch Library, which is located south of the Fenton Marketplace and across from the Fenton Parkway trolley station. This 19,760-square foot facility includes a large community meeting room, seminar rooms, a children's library, an outdoor patio with a children's garden and flowing river sculpture, a computer lab, and a mezzanine and terrace (KPBS, 2017).

Generally, the CPU area to the east of SR-163 is within the two-mile service area of the Mission Valley Branch Library, while the remainder of the CPU area is within the two-mile service radii of other branches, including the Mission Hills/Hillcrest, Linda Vista, and University Heights branches. The new Mission Hills/Hillcrest Library is a 15,000 square-foot facility that will replace the existing 3,850 square-foot facility and is scheduled to open in 2019 (City of San Diego, 2018c). As of 2018, there are no other plans to build new or expand upon existing libraries in or near the CPU area (City of San Diego, 2018d).

Table 4.11-1: San Diego Unified School District Enrollment for Schools Serving Mission Valley (2007-08 and 2016-17)

<i>School</i>	<i>Capacity</i>	<i>Enrollment (2007 – 2008)</i>	<i>Enrollment (2016 – 2017)</i>	<i>Excess Room (2016 – 2017) (Capacity minus Enrollment)</i>
Elementary Schools	5,940	4,937	4,823	1,117
Adams	609	387	297	312
Bay Park	497	456	455	42
Birney	432	339	557	-125
Carson	643	498	418	225
Dewey	484	443	342	142
Fletcher	278	258	200	78
Florence	279	281	247	32
Foster	506	425	379	127
Franklin	332	288	326	6
Garfield	471	397	310	161
Grant	632	531	731	-99
Jones	406	320	312	94
Juarez	371	314	249	122
Middle Schools	9,308	6,991	6,076	3,232
Correia	1,062	925	784	278
Dana	1,056	811	804	252
Lewis	1,184	1,052	1,159	25
Marston	1,205	1,098	689	516
Montgomery	969	620	450	519
Roosevelt	1,174	969	1,020	154
Taft	863	734	507	356
Wilson	1,795	782	663	1,132
High Schools	13,453	12,880	11,334	2,119
Clairemont	1,607	1,527	960	647
Henry	2,519	2,438	2,408	111
Hoover	2,321	2,163	2,122	199
Kearny	1,961	1,828	1,480	481
Point Loma	2,052	2,024	1,950	102
San Diego	2,993	2,900	2,414	579
Total	28,701	24,808	22,233	6,468

Source: San Diego Unified School District, 2017.

Parks and Recreation

Population-Based Parks and Facilities

City-designated population-based parks are intended to serve a Community Plan area and include Community and Neighborhood parks. The City's General Plan contains a population-based parks standard of 2.8 acres per 1,000 residents and establishes park guidelines for different facility types. The CPU area, as of 2018, has a total of 20.58 useable acres of population-based parks for its 20,800 residents translating to a ratio of 1.01 acres per 1,000 residents. Key guidelines for population-based parks are described further in the Regulatory Setting below.

Four population-based parks were identified in or near the CPU area, Sefton Field, Civita Park, the Town and Country Park, and Presidio Community Park.

- **Sefton Field.** Located on the west end of the CPU area just north of Interstate (I-) 8, Sefton Field is an Neighborhood Park of 8.05 useable acres that contains four active ballfields, a passive lawn area, a concession stand, parking, and a portion of the San Diego River Pathway.
- **Civita Park.** Civita Park is a Neighborhood Park located at the center of the mixed-use Civita Life development. Civita Central Park opened to the public in May 2017, and included a multi-level park containing 11 acres of park space with an outdoor amphitheater, an interactive water feature, picnic tables, a game area, a community garden, dog parks, and restrooms. The second phase of the park will include additional playgrounds, fields, and gardens and is scheduled to open in 2018. The total planned parkland, including public and private parks, is approximately 17.3 acres.
- **Town and Country Park.** West of SR-163, the Town and Country redevelopment will incorporate a river park pursuant to the San Diego River Park Master Plan. The proposed improvement includes an unbroken, multi-use San Diego River Pathway connecting existing and future open spaces to existing neighborhoods within the 35-foot buffer from the floodway. Along with the proposed mixed-use development, Town and Country will also provide open space and a population-based park in addition to the required habitat restoration area.
- **Presidio Community Park.** Just southeast of the CPU area in the Old Town Community Plan area is the 12-acre Presidio Community Park. The Presidio Community Park contains approximately nine acres leased as a golf course and three acres of usable population-based park land. The population-based park area contains a softball field, picnic area, parking lot, basketball court, passive lawn areas, and a recreation center. While not located in the CPU area, its proximity to the CPU area allows for regular use by Mission Valley residents.

Parks locations are shown in Figure 4.11-3.

Resource-based Parks

Resource-based parks are intended to preserve and make available to all residents and visitors those areas of outstanding scenic, natural, or cultural interest. Resource-based parks are located at, or centered on, notable natural or man-made features (e.g., beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population as well as visitors (City of San Diego, 2015). Resource-based parks in or near the CPU area include the existing San Diego River Park (see Figure 4.11-3).

San Diego River Park is one of four river parks in the City of San Diego and is defined as a resource-based park in the City's General Plan. The San Diego River Park Master Plan, adopted in 2013, provides a vision and recommendations to foster a connected river park system along the 17.5-mile stretch of San Diego River. Within the CPU area, multi-use pathways for bicycles and pedestrians currently exist on both sides of the San Diego River between SR-163 and Qualcomm Way. The pathways were constructed as part of the First San Diego River Improvement Project (FSDRIP). San Diego River pathways can also be found north of the river adjacent to the Fenton Parkway trolley station and south of the river from Sefton Field to the western edge of the CPU area. Accompanying the pathways are a range of facilities including seating areas, bicycle racks, and directional and interpretive signage supporting recreational use.

Planned Parks and Recreation Facilities

There are over 150 acres of potential and planned population-based and joint use parks. Planned parks are parks that have undergone the development approval and design process but have not yet been constructed, where potential parks are locations with park opportunities, but have yet to undergo development approval. Table 4.11-2 provides an inventory of all planned and potential parks within the CPU area.

Recreational Open Space and Trails

Open space refers to lands that are typically free from development and kept in their natural state to protect their natural resources and habitat value; provide responsible, public access through hiking, biking and equestrian trails; provide for managed production of resources; or ensure public safety by limiting activity in hazardous areas. Open space areas in Mission Valley include the Mission Valley Preserve, located along the river on the western end of the CPU area; additional City-owned open space located along the steep south and north facing hillsides; and Cottonwood Grove Park, located immediately to the west of Sefton Field. The Mission Valley Preserve includes interpretive trails, a passive seating and picnic area, and a portion of the San Diego River Pathway along the southern edge. The hillside open spaces have opportunity for trail connections. Open space resources are shown in Figure 4.11-3.

Figure 4.11-2: Existing and Planned School Facilities Serving the Mission Valley Community



	Trolley Stops		Existing Schools		Charter Schools		Lakes/Ponds/Bays
	Light Rail		Public Elementary Schools		Private Schools		Mission Valley Community Plan Boundary
	Freeways		Public Middle Schools		Other Alternative Schools/Special Education		Community Planning Areas
	Ramps		Public High Schools		Planned/Potential Schools		
	Streams/Creeks						

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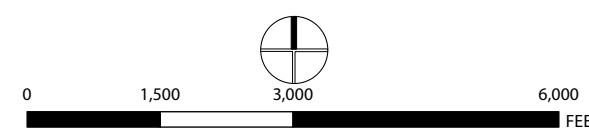
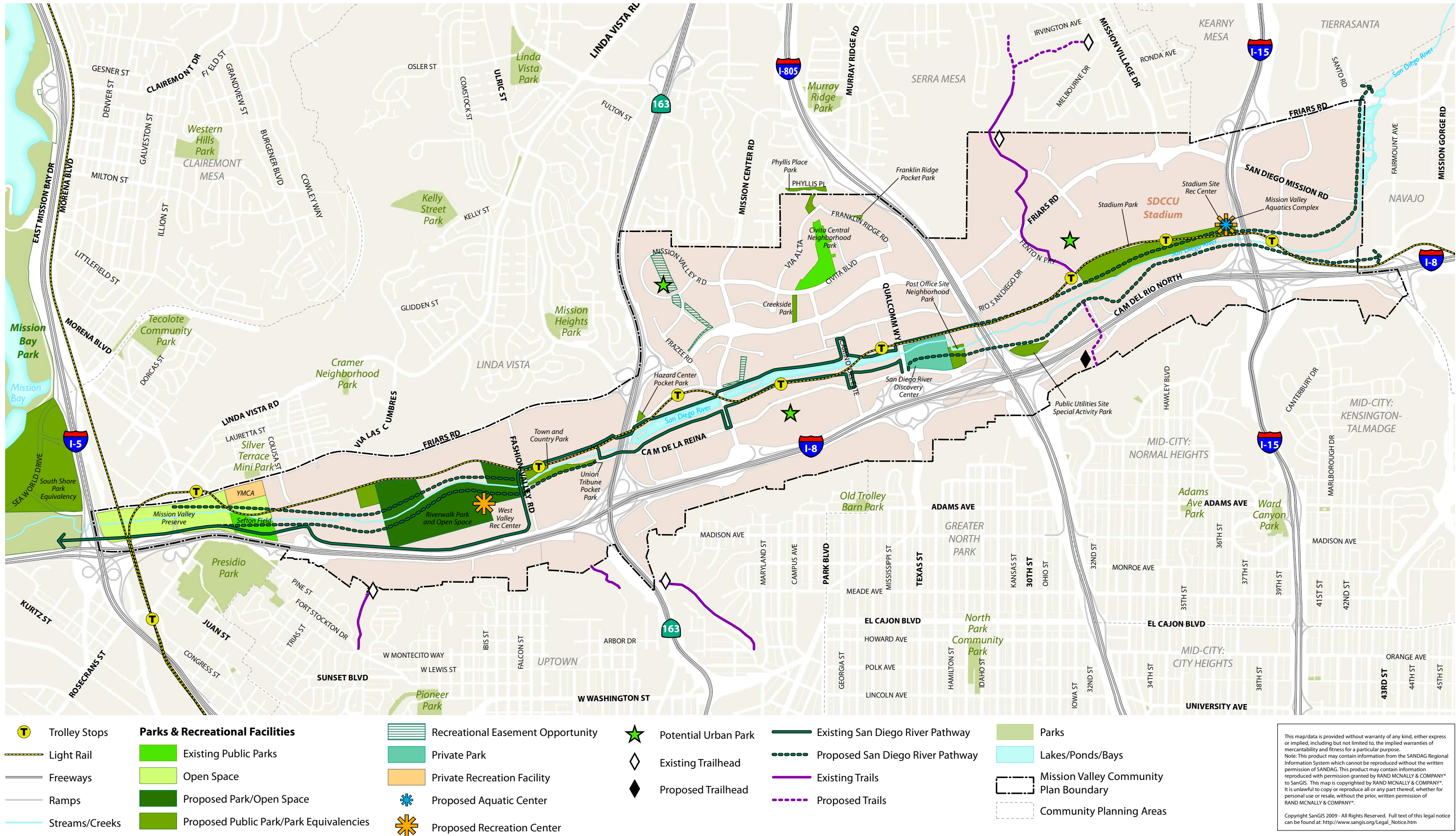


Figure 4.11-3: Existing and Planned Park and Open Space Resources



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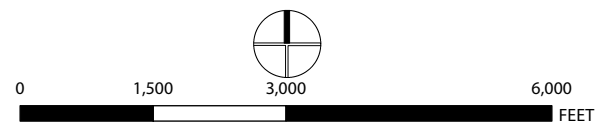


Table 4.11-2: Planned and Proposed Population-Based Park Facilities

<i>Park Name</i>	<i>Current Acres</i>	<i>Future Acres</i>	<i>Total Acres</i>
<i>Parks</i>			
Stadium Park	–	34	34
Riverwalk Park	–	27	27
Civita Central Neighborhood Park	11.03	5.04	16.07
Sefton Field	8.05	0	8.05
Post Office Site Neighborhood Park	–	4.10	4.10
Public Utilities Site Special Activity Park	–	4.10	4.10
Hazard Center Pocket Park	–	0.63	0.63
Franklin Ridge Pocket Park	–	0.20	0.20
Parks Total	19.08	75.07	94.15
<i>Park Equivalences</i>			
Mission Bay Park, South Shores	0	34	34
San Diego River Pathway	5.37	8.53	13.9
Mission Valley Preserve Open Space Trail	–	2.07	2.07
Town and Country Park	–	3.31	3.31
Civita Central Park	–	1.85	1.85
Creekside Mini-Park	–	1.37	1.37
Phyllis Place Park	–	1.33	1.33
Union Tribune Pocket Park	–	0.81	0.81
Park Equivalencies Total	5.37	53.27	58.64

Source: City of San Diego, 2019.

4.11.1.2 REGULATORY SETTING

State Regulations

Assembly Bill 2926

Assembly Bill (AB) 2926, passed in 1986, allows school districts to collect impact fees from developers of new residential and commercial/industrial building space to assist in providing school facilities for students. Development impact fees (DIFs) are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects.

Senate Bill 50 (Statutes of 1998), State School Funding, Education Code Section 17620

California Education Code 17620 establishes the authority of any school district to levy a fee, charge, dedication, or other requirements against any development within the school district for the purposes of funding the construction of school facilities, as long as the district can show justification for the fees. Senate Bill (SB) 50, adopted in 1998, limits the power of cities and counties

to require mitigation of school facilities impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules.

Local Regulations

City of San Diego Municipal Code

Fire Protection

The SDFD has an active program that promotes the clearing of canyon vegetation away from structures in accordance with Section 142.0412 of the SDMC and the SDFD's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on City property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the SDFD (per SDMC Section 142.0412(i)) or a previously recorded entitlement requires a width more or less than the standard 100 feet. Other fire prevention measures include adopting safety codes and an aggressive brush management program.

Development Impact Fees

Per SDMC Section 142.0640, the City requires payment of DIFs to collect a proportional fair share cost of capital improvements needed to offset the impact of development. DIFs are based on community-specific financing plans known as Impact Fee Studies (IFS). The IFS sets community-level priorities for facility financing and ensures that new development pays its proportional fair share of public facilities costs through the payment of DIFs.

City of San Diego General Plan

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element of the General Plan includes policies on the prioritization and provision of public facilities and services, evaluation of new growth, guidelines for implementing a financing strategy, and guidelines for the provision of specific facilities. Relevant standards and policies related to public facilities and services discussed in this section are summarized below.

FIRE PROTECTION

The Public Facilities, Services, and Safety Element of the General Plan establishes fire response goals, standards, and policies. Response time standards are as follows:

- To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5-minute company turnout time, and 5-minute drive time in the most populated areas.

- To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to five medical patients at once.
 - This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas.

Per Policy PF-D.2, the City of San Diego determines fire station location, timing, and crew size planning as the population of the city grows. To direct fire station location, timing, and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones are listed in Table 4.11-3: Deployment Measures for San Diego City Growth by Population Density per Square Mile. If the SDFD is not meeting first-due unit travel times, additional facilities may be necessary.

Table 4.11-3: Deployment Measures for San Diego City Growth by Population Density per Square Mile

	<i>Structure Fire Urban Area</i>	<i>Structure Fire Rural Area</i>	<i>Structure Fire Remote Area</i>	<i>Wildfires Populated Area</i>
	<i>>1,000 people/sq. mi.</i>	<i>1,000 to 500 people/sq. mi.</i>	<i>500 to 50 people/sq. mi.</i>	<i>Permanent Open Space Areas</i>
Ist Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
Ist Alarm Travel Time	8	16	24	15
Ist Alarm Total Reflex	10.5	18.5	26.5	17.5

Source: City of San Diego General Plan, 2015.

Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregate into a population “cluster,” the standards as shown in Table 4.11-4: Deployment Measures to Address Future Growth by Population Clusters, guide the determination of response time measures and the need for fire stations.

Table 4.11-4: Deployment Measures to Address Future Growth by Population Clusters

<i>Area</i>	<i>Aggregate Population</i>	<i>First-Due Unit Travel Time Goal</i>
Metropolitan	> 200,000 people	4 minutes
Urban-Suburban	< 200,000 people	5 minutes
Rural	500 - 1,000 people	12 minutes
Remote	< 500	> 15 minutes

Source: City of San Diego General Plan, 2015.

POLICE PROTECTION

The Public Facilities, Services, and Safety Element establishes average police response time goals. According to Policy PF-E.2, the City’s goal is to maintain average police response times as development increases, and the population grows. Average response time goals are as follows:

- Priority E Calls (imminent threat to life) within seven minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes.
- Priority 4 Calls (minor requests for police service) within 90 minutes.

SCHOOLS

The General Plan seeks to assist school districts and other educational authorities in resolving problems arising over the availability of schools and educational facilities in the city (Policy PF-K.1 of the Public Facilities, Services, and Safety Element). Per Policy PF-K.6, the City seeks to expand and continue the joint use of schools with adult education, civic, recreational, and community programs.

LIBRARIES

General Plan Public Facilities, Services, and Safety Element Policy PF-J.2 establishes a goal of a minimum of 15,000 square feet of dedicated library space for branch libraries. Per Policy PF-J.3, the City should plan for larger library facilities that can serve multiple communities and accommodate sufficient space to serve the larger service area and maximize operational and capital efficiencies.

Recreation Element

The Recreation Element of the General Plan seeks to acquire, develop, operate/maintain, increase, and enhance public recreation opportunities and facilities throughout the city. The element contains population-based guidelines for parks and recreation facilities and presents alternative strategies to meet those guidelines. Per Policy RE-A.8, the City’s standard for population-based parks is 2.8 usable acres per 1,000 residents, which can be achieved through a combination of population-based parks and park equivalencies, which are established in Policy RE-A.9. Per Table

RE-3 of the Recreation Element, the standard for a recreation center is a minimum of 17,000 square feet per recreation center to serve a population of 25,000, and the standard for an aquatic complex is one aquatic complex per 50,000 people or within approximately six miles.

Per Policy RE-A.18, the City seeks to pursue joint use agreements for recreational facilities or other public agency-owned land to help implement the population-based park acreage requirements if they meet the criteria for equivalencies. Table RE-4 of the Recreation Element includes a list of facilities that may be considered as population-based park equivalencies.

4.11.2 Impact Analysis

4.11.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to public services and facilities are based on the City's CEQA Significance Determination Thresholds (City of San Diego, 2016), which have been modified to guide a programmatic analysis of the proposed CPU. A significant impact to public services and facilities could occur if implementation of the proposed CPU would promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, schools, libraries, parks or other recreational facilities), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

4.11.2.2 METHODOLOGY AND ASSUMPTIONS

Potential impacts resulting from implementation of the proposed CPU were evaluated based on a review of relevant public facility and safety standards, policies, student generation rates, and population buildout and capacity estimates.

Population

This analysis uses a buildout population estimate of 72,400 for the proposed CPU, including existing and new development for the entire CPU area derived from a projected dwelling unit count of approximately 39,160 units. With a base year (2012) population of 20,800 and a housing unit count of approximately 11,200 units, the net increase in population and housing units between base year and full buildout is approximately 51,600 and 28,000, respectively.

Police Services

This analysis uses the SDPD's goal of maintaining a ratio of 1.48 sworn officers per 1,000 residents for police services across the entire SDPD service area.

Fire/Life Safety Protection

This analysis uses the SDFD's goal of responding within 7.5 minutes of a dispatch notification at least 90 percent of the time from the receipt of the 911 call in fire dispatch.

Schools

Per correspondence with SDUSD (Appendix K), projected demand for school facilities is based on housing units resulting from buildout of the proposed CPU. The student generation rates provided by SDUSD were used to determine the projected number of elementary, middle, and high school students per housing unit. Student generation rates are based on the number of units, bedroom mix, affordable or senior housing in the community, proximity to schools and other amenities, the neighborhood, and other factors. To determine the number of students in the CPU area in 2050, the student generation rates were applied to the number of housing units in the CPU area. Student generation rates used to project student population at buildout for elementary, middle, and high schools per housing unit are shown in Table 4.11-5: Assumed Student Generation Rates per Housing Unit (2050).

Table 4.11-5: Assumed Student Generation Rates per Housing Unit (2050)

	Low	High ¹
Elementary Schools (K-5)	0.032	0.064
Middle Schools (6-8)	0.009	0.018
High Schools (9-12)	0.012	0.024

1. The high student generation was calculated by doubling the low student generation rate (San Diego Unified School District, 2018).

Source: San Diego Unified School District, 2018.

Parks

This analysis uses the General Plan’s population-based parks standard of 2.8 acres per 1,000 residents. To project the amount of parkland required to meet the standard at buildout, the projected buildout population of approximately 72,400 in the CPU area was divided by 1,000 and multiplied by 2.8 acres. The park service ratio at buildout is compared to the existing park service ratio.

4.11.2.3 IMPACTS

Impact 4.11-1: Public Facilities

Would the proposed CPU promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, fire/life safety protection, schools, libraries, and parks or other recreational facilities), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

Police Protection

Buildout estimates for the proposed CPU assume approximately 51,600 new residents within the CPU area by 2050. In order to serve the CPU area’s buildout population at SDPD’s service ratio goal of 1.48 officers per 1,000 residents, SDPD would need 76 new officers. Thus, new police

facilities may eventually be required to achieve and maintain service ratios. The proposed CPU supports the development of a satellite police station on the former Stadium site to serve a future dense, active area. Additional stations may be required to serve the buildout population, although actual needs and potential locations would be determined in the future as development occurs.

Construction of new police facilities in the future could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. Compliance with existing regulations would serve to reduce potential environmental impacts related to the construction of new police stations. Additionally, any future construction of police facilities would be subject to a separate environmental review at the time design plans are available.

The proposed CPU also includes policies and ~~implementation~~ implementing actions aimed at reducing potential negative environmental impacts resulting from the construction of new police facilities. Policies specify that new buildings should strive to qualify for LEED accreditation and identify building design strategies to minimize the use of building heating and cooling systems. Policies in the proposed CPU require new development and redevelopment to incorporate best management practices (BMPs) that address storm water runoff, and that require development to conform to the most current federal, State, and local flood proofing standards and siting criteria to prevent San Diego River flow obstruction.¹ Other proposed CPU policies and ~~implementation~~ implementing actions aim to modernize facilities and equipment, and ensure that rights-of-way do not impede access for emergency responders.² These policies would work to enhance the effectiveness of existing facilities and reduce the need for increased police service in the CPU area over time.

While the City would collect fees from future development to fund needed infrastructure, such as police stations, and the proposed CPU contains policies that support identifying funding to support the development and upgrading of police stations within Mission Valley, this impact would be significant and unavoidable since impacts associated with construction and operation of any future facility are not known at this time.

Fire/Life Safety Protection

Implementation of the proposed CPU would result in increased demand for fire protection services due to population growth at buildout. This population growth could increase the call volume for fire protection in the CPU area, thereby increasing SDFD response times, and contributing to the need for new or altered facilities. The proposed CPU supports the collocation of a new Fire-Rescue station just outside of the CPU area at 5215 Gaines Road with the existing SDPD facility at that site. Beyond this potential Fire-Rescue station, additional stations may be required to serve the buildout population, although future facilities would be planned to meet community needs based on the General Plan's standards as detailed above in the Regulatory Setting section.

¹ See Policies for Development GBP-1 through GBP-3, FSR-1, and FSR-2, and Design Guidelines DG-28 and DG-45.

² See Policy for Development EAI-1, EAI-4, and EAI-5, and Implementing Actions IA-69 through IA-71, IA-73, and IA-74.

Construction of new fire service facilities in the future could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. Compliance with existing regulations would serve to reduce potential environmental impacts related to the construction of new Fire-Rescue stations. Additionally, any future construction of fire service facilities would be subject to a separate environmental review at the time design plans are available.

The proposed CPU also includes policies and ~~implementation~~ implementing actions aimed at reducing negative environmental impacts resulting from the construction of new fire service facilities. Policies specify that new buildings should strive to qualify for LEED accreditation and identify building design strategies to minimize use of building heating and cooling systems. Policies require that new development and redevelopment incorporate BMPs addressing storm water runoff, and that development conforms to the most current federal, State, and local flood proofing standards and siting criteria to prevent San Diego River flow obstruction.³

Proposed CPU policies and implementing actions aimed at increasing fire safety include siting buildings to provide for adequate emergency access, reducing the potential for wildfire hazards by managing flammable vegetation, applying for grants and working with local organizations that support clearing debris and overgrown vegetation along the San Diego River in order to reduce flammability, modernizing facilities and equipment, and ensuring that rights-of-way do not impede access for emergency responders.⁴ Compliance with these policies and actions would serve to enhance the effectiveness of existing facilities and reduce the need for increased fire service in the CPU area over time.

While the City would collect fees from future development to fund needed infrastructure, such as fire stations, and the proposed CPU contains policies that support identifying funding to support the development and upgrading of fire stations within Mission Valley, this impact would be significant and unavoidable since impacts associated with construction and operation of any future facility are not known at this time.

Schools

At buildout of the proposed CPU, the school-aged population is expected to increase and impact student enrollment totals in SDUSD facilities serving the CPU area. The projected number of students in the CPU area in 2050 is estimated based on student generation rates (see Table 4.11-5). As shown in Table 4.11-6: Student Generation from Housing Units in the CPU Area, residential development from implementation of the proposed CPU could generate approximately 1,500 to 3,000 new students in the CPU area. Table 4.11-7: Potential Students and School Capacity at Buildout, shows excess enrollment capacity based on 2016-2017 enrollment, high and low estimates of potential new students, and the differential between available seats and potential students.

As shown in Table 4.11-7, the projected elementary school population at buildout would exceed the existing capacity while the middle and high school population could be accommodated by

³ See Policies for Development GBP-1 through GBP-3, FSR-1, and FSR-2, and Design Guidelines DG-28 and DG-45.

⁴ See Policies for Development EAI-1 through EAI-5 and Implementing Actions IA-69, IA-70, and IA-72 through IA-

existing facilities. The elementary school capacity shown in Table 4.11-7 does not include enrollment capacity for the planned Civita Elementary School. Per the 2017 Quarry Falls EIR addendum, the planned elementary school would accommodate up to 500 students. As shown in Table 4.11-7, existing elementary school facilities and the planned elementary school would be sufficient to accommodate the low K-5 student estimate of 1,253 students. However, estimated existing and planned elementary school capacity would be exceeded by the high potential student estimate of 2,506.

Table 4.11-6: Student Generation from Housing Units in the CPU Area

	2012-2013 Existing Units: 11,244		Additional Units under CPU: 27,914	
	Student Generation Rates	Number of Students	Student Generation Rates	Number of Students
Elementary Schools (K-5)	0.032	362	0.032 – 0.064	893 - 1,786
Middle Schools (6-8)	0.009	103	0.009 – 0.018	251 – 502
High Schools (9-12)	0.012	133	0.012 – 0.024	335 – 670
TOTAL (K-12)	0.053	598	0.053 – 0.106	1,479 – 2,958

Sources: City of San Diego, 2018; Dyett and Bhatia, 2018; San Diego Unified School District, 2018.

Table 4.11-7: Potential Students and School Capacity at Buildout

	Total Enrollment Capacity (2016-2017)	Excess Enrollment Capacity (2016-2017)	Low Estimate		High Estimate	
			Potential Students	Difference	Potential Students	Difference
Elementary Schools (K-5)	5,940	1,117	1,253	-136	2,506	-1,389
Middle Schools (6-8)	9,308	3,232	352	2,880	705	2,527
High Schools (9-12)	13,453	2,119	470	1,649	940	1,179
TOTAL (K-12)	28,701	6,468	2,075	4,393	4,151	2,317

Note: Total enrollment capacity does not include planned elementary school at Civita.

Sources: City of San Diego, 2018; Dyett and Bhatia, 2018; San Diego Unified School District, 2017; San Diego Unified School District, 2018.

According to SDUSD, the potential increase in students from implementation of the proposed CPU would likely impact district facilities to the point of reaching capacity. The proposed CPU identifies a potential school site at the Stadium site that could help increase existing capacity, and SDUSD is also in the process of planning a new school within the Civita development. ~~To ensure that school space is available for future residential growth,~~ SDUSD may also undertake a number of potential

measures to ensure that school space is available for future residential growth, including reducing the number of non-resident students or adjusting attendance boundaries (SDUSD, 2018).

Under SB 50 (Chapter 407, Statutes of 1998), a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities, and payment of these fees is considered “full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities” (California Government Code Section 65995). The school district will be responsible for the potential expansion or development of new facilities.

While SDUSD would collect fees from future development to fund school facilities, if needed, this impact would be significant and unavoidable since impacts associated with the construction and operation of any future facility are not known at this time.

Libraries

There are no new library branches proposed as part of the CPU. Implementation of the proposed CPU could result in additional residents and associated demand for library services. As noted, the CPU area is generally covered by the two-mile service areas of existing libraries, including the Mission Valley Branch, located in the CPU area, and the Mission Hills/Hillcrest, Linda Vista, and University Heights branches. Additionally, a new 15,000 square-foot Mission Hills/Hillcrest Branch Library is scheduled to open in 2019 which will serve the Mission Valley community. Therefore, the service area of the existing libraries is adequate to meet the Mission Valley community’s needs.

In the event that implementation of the proposed CPU results in the need for new or expanded library facilities, existing development regulations would serve to reduce potential environmental impacts associated with construction. Additionally, future projects would be subject to a separate environmental review at the time design plans are available. Nevertheless, this impact would be significant and unavoidable since impacts associated with the construction and operation of any future facility are not known at this time.

Parks and Recreation

The proposed CPU includes policies to develop new parks and recreation facilities in the CPU area.⁵ Proposed park/open space and proposed public park/park equivalencies under the CPU are shown in Figure 4.11-3 and summarized in Table 4.11-8: Existing and Proposed Parks. The proposed CPU provides for the development of a number of new population-based parks, including two major parks (Stadium Park and Riverwalk Park), two Neighborhood Parks (Civita Central Neighborhood Park and a park on the Post Office site), a mini park in the Civita development, two pocket parks (Franklin Ridge and Hazard Center), and a special activity park (Public Utilities site), as well as several park equivalencies as opportunities arise. The proposed CPU also provides for the construction of two recreation centers—one at the Stadium site and one near the Riverwalk site—

⁵ See Policies for Development PDI-1 through PDI-3, POD-1 through POD-10, and PSD-1 through PSD-7.

and one aquatic complex (location to be determined) in the CPU area. Proposed implementing actions also encourage the development of parks within new developments.⁶

Proposed park equivalencies include the Mission Valley Preserve Canyon Open Space Trail; portions of resource-based parks, including trail amenities to support the San Diego River Pathway and redevelopment of the southeast area of Mission Bay Park; privately-owned park sites, including a proposed pocket park at the Union Tribune site, a three-acre Neighborhood Park as part of the Town and Country Hotel revitalization project, a proposed mini park in the Civita development, and a proposed approximately two-acre Neighborhood Park in the Civita development; and non-traditional parks, including parks to be developed in conjunction with redevelopment projects, including the Mission Valley Heights project, the Mission Valley Mall, and Fenton Marketplace.

Based on the projected population of approximately 72,400 for the proposed CPU, General Plan standards for population-based parks and recreation facilities would involve a minimum of 203 usable acres of parkland at full community development. As of 2018, there are approximately 19 acres of population-based parks in the CPU area. The proposed CPU includes approximately 75 additional acres of population-based parkland, bringing the grand total of population-based parks at buildout to approximately 94.15 acres, about 108.85 acres short of the 203-acre goal. Including park equivalencies, the park total at buildout would be 152.79 acres, still at least 50.21 acres short of the park acreage goal of 203. Thus, there may be a need for additional parkland to serve the community at buildout of the proposed CPU, which may be attained through parkland included in new developments or park equivalencies as provided for in the proposed CPU policies.

Opportunities for additional parkland and recreational facilities within the CPU area are anticipated to come primarily through redevelopment of private and public properties and would thus be unlikely to disturb undeveloped land. As new recreational facilities are sited, designed, and constructed, existing regulations would serve to reduce potential construction impacts. Additionally, future projects would be subject to a separate environmental review at the time design plans are available.

Policies in the proposed CPU would also serve to ensure that recreation facilities in open space areas do not negatively affect biological resources.⁷ Proposed policies also seek to ensure maintenance of existing recreational facilities to ensure that they continue to adequately serve the population and seek opportunities such as joint-use agreements to effectively use existing facilities.⁸ Policies that promote connectivity in the park system would direct recreational activity towards developed park areas and improve access to existing facilities, potentially reducing the risk of visitors negatively impacting undeveloped areas and reducing the need for new facilities in the long-term.⁹

Nevertheless, this impact would be significant and unavoidable since impacts associated with the construction and operation of any future park facilities are not known at this time.

⁶ See Implementing Actions IA-41 through IA-48.

⁷ See Policies for Development AOS-7 and OSP-2.

⁸ See Policy for Development PDI-2 and Implementing Actions IA-45, IA-49, and IA-50.

⁹ See Policies for Development OSP-2 and AOS-5, and Implementing Actions IA-54, IA-56, and IA-62.

Table 4.11-8: Existing and Proposed Parks

	<i>Usable Acres</i>
Population-Based Parks	
Total Proposed at Buildout	94.15
<i>Existing</i>	19.08
<i>Proposed New</i>	75.07
Total Required ¹ at Buildout	203.0
Population-Based Park Deficit at Buildout	108.85
<i>Park Equivalencies²</i>	
Total Proposed at Buildout	58.64
<i>Existing</i>	5.37
<i>Proposed New</i>	53.27
Population-Based Park and Park Equivalency Deficit at Buildout	50.21

Notes:

1. General Plan standard: 2.8 usable acres times a community build-out population of approximately 72,400 divided by 1,000 = 203 usable acres of population-based parks.
2. Park equivalencies include trails, portions of resource-based parks, privately-owned parks, non-traditional parks, and proposed facility expansions.

Table 5 of the proposed CPU contains a detailed inventory of the existing, planned, and proposed population-based parks, which lists the existing usable acreage by park, the proposed usable acreage, existing conditions and amenities, and proposed actions and recommended recreation amenities.

Sources: City of San Diego, 2018, Dyett & Bhatia, 2018.

Mitigation Measures

None available at this time. The impact would remain significant and unavoidable.

4.12 Public Utilities and Infrastructure

This section analyzes potential impacts from future development under the proposed CPU as it relates to public utilities, namely water supply, sewer, storm water, communication systems, and solid waste systems. It provides a discussion of the physical setting and regulations applicable to future development that could occur under the proposed CPU. This section also includes a discussion of the Water Supply Assessment (WSA) prepared by the City's Public Utilities Department (PUD), which is included as Appendix L of this PEIR.

4.12.1 Environmental Setting

4.12.1.1 PHYSICAL SETTING

Water Supply

Metropolitan Water District

The Metropolitan Water District (MWD) is Southern California's wholesale water provider. The MWD service area is approximately 5,200 square miles and includes the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura. There are 26 member agencies of the MWD, including 14 cities and 11 municipal water districts. MWD owns and operates the Colorado River Aqueduct, and the Colorado River is one of their two main water sources. Under the priority system that governs the distribution of Colorado River water made available to California, MWD holds the fourth priority right of 550,000 acre-feet per year (AFY) (City of San Diego, 2016).

MWD's second major water source is the State Water Project (SWP), owned by the State of California and operated by the Department of Water Resources (DWR). The SWP's supply originates in Northern California with water captured from the Feather River Watershed behind Lake Oroville Dam. MWD is the largest, in terms of population served, of the 29 agencies that have long-term contracts for water service from DWR. MWD's contract with DWR provides for the ultimate delivery of 1,911,400 AFY, which is 46 percent of the total SWP entitlement (City of San Diego, 2016).

MWD's existing water supplies have been historically sufficient to meet demands within its service area during years of normal precipitation, and while it manages reserve supplies to account for normal drought conditions, regulatory actions have placed limitations on its ability to provide water to its member agencies. Future population growth, regulatory restrictions, increased

competition for low-cost water supplies, and other factors such as climate change could impact MWD's ability to supply its member agencies even in normal years.

San Diego County Water Authority

The San Diego County Water Authority (SDCWA) is one of the member agencies of MWD. SDCWA is the countywide wholesaler and is made up of 24 public member agencies stretching from the United States/Mexico border to the Orange County and Riverside County borders. SDCWA owns and operates five large-diameter pipelines to deliver imported water to its member agencies. SDCWA has embarked on a multi-year Emergency Storage Plan to provide up to six months of emergency water supplies in the event of a system failure or other issue with receiving imported water from MWD (City of San Diego, 2016).

In November 2012, SDCWA's Board of Directors approved a 30-year Water Purchase Agreement with Poseidon Resources, a private investor-owned company, to purchase water from the proposed Carlsbad Desalination Plant. The plant and conveyance pipeline were completed in 2015 and, as of 2018, meet approximately 10 percent of the region's water demand (SDCWA, 2018).

The SDCWA has encouraged the development of local water supply projects, such as water recycling and groundwater projects, through the award of Local Water Supply Development (LWSD) incentives. The LWSD Program sets a Maximum Contribution Rate of \$200 per acre-foot yielded by each local project. This rate can be revisited and adjusted periodically by the Board of Directors (SDCWA, 2010).

City of San Diego Public Utilities Department

The City's PUD is one of the public member agencies of the SDCWA and serves a population of 1.33 million, which is expected to increase about 1 percent annually over the next 25 years. The PUD's water system extends over 404 square miles and includes both potable and recycled water facilities. The City's water system has nine reservoirs, two water reclamation plants, three water treatment plants, and 29 treated water storage facilities. The City's water system is split into three major service areas: Miramar, Alvarado, and Otay.

The CPU area lies within the PUD's Alvarado service area. The Alvarado Water Treatment Plant (WTP) was originally constructed in 1951 and has a current capacity of 224,028 AFY. Of the City's nine reservoirs, the El Capitan, San Vicente, Sutherland, and Lake Murray Reservoirs (236,311 acre-feet [AF] total capacity) serve the Alvarado WTP in central San Diego. Lake Hodges Reservoir, with a total capacity of 30,251 AF, is connected to Olivenhain Reservoir, which is owned by the SDCWA, and can be delivered to any City treatment plant. The Alvarado WTP generally serves the geographical area from National City to the San Diego River (City of San Diego PUD, 2018).

Surface Water

The PUD maintains and operates nine reservoirs that capture surface water runoff from rainfall within local watersheds. These nine reservoirs provide approximately 19 percent of the City's total water supply. In the San Diego region, approximately 13 percent of local precipitation produces surface run-off to streams that contribute to these reservoirs. Approximately half of this runoff evaporates during reservoir storage, while the other half is used for the municipal water supply. Most of the runoff to reservoirs is produced in years with much greater than average rainfall. As with the local climate, average rainfall is about the minimum required to saturate the soils sufficiently for significant surface runoff (City of San Diego, 2016).

In addition to availability, the use of local surface water is affected by water resource management policies. The PUD's policy is to use local water first to reduce imported water purchases. The PUD also operates emergency and seasonal storage programs in conjunction with its policy. The purpose of emergency storage is to maintain an accessible amount of stored water that could provide an uninterrupted supply of water to the City's water treatment facilities, should an interruption to the supply of imported water occur. The purpose of seasonal storage is to store surplus imported water in the wet winter season for use during the dry summer season. The PUD may also increase use of imported water, in lieu of local water, in the winter so local water may be saved in reservoirs or groundwater basins for summer use (City of San Diego, 2016).

Recycled Water

While the PUD has historically imported nearly all of its water from the SDCWA, it also strives for more local surface water, recycled water, and conservation efforts to meet or offset potable demands. Recycled water is wastewater that has undergone additional treatment to make it suitable for a range of beneficial uses. Recycled water has been used in the City for almost 20 years and is produced by two water reclamation plants: the North City Water Reclamation Plant (NCWRP) and the South Bay Water Reclamation Plant (SBWRP). The total wastewater treatment capacity of the two plants is 50,406 AFY. Landscape irrigation continues to be the leading use of recycled water, but the customer base has become more varied over the years with an increase in the number of industrial and dual plumbed meter connections (City of San Diego, 2016).

The City's Pure Water San Diego Program (Pure Water), approved by City Council in 2014 is intended to provide a reliable drinking water supply that is locally controlled and drought-proof. The program will use advanced water treatment processes to turn recycled water into water of equal or greater quality than the imported sources. The Morena Pump Station and Influent Sewers of the Pure Water project are planned for the westernmost edge of the CPU area and will undergo a separate environmental review process from the proposed CPU. Pure Water will be implemented in phases and is expected to be completed by 2035 (City of San Diego, 2016).

Conservation

Established by the City Council in 1985, the Water Conservation Program has accounted for more than 31,240 AF of potable water savings. These savings have been achieved by adopting programs, policies, and ordinances designed to promote water conservation practices, and by implementing comprehensive public information and education campaigns. The City offers a broad range of conservation tactics to help meet the needs of residential and commercial water customers. These tactics include, but are not limited to, the following:

- Rebate programs for high efficiency toilets, washing machines, and commercial water saving devices;
- Rebates for replacing grass with sustainable landscapes and micro-irrigation systems;
- Residential interior/exterior and commercial landscape survey programs; and
- Public education and outreach.

Planning efforts to increase water conservation is an ongoing process, and these conservation programs undergo periodic reevaluation to ensure the realization of forecasted savings. Table 4.12-1 shows the breakdown of how surface water, conservation, and recycled water have aided water demands in San Diego from 1990 to 2010.

Table 4.12-1: San Diego PUD Historic Imported, Local, and Recycled Water Demands

<i>Fiscal Year</i>	<i>Imported Water (AF)</i>	<i>Local Surface Water (AF)</i>	<i>Conservation (AF)</i>	<i>Recycled Water (AF)</i>	<i>Total (AF)</i>
1990	233,158	22,500	-	-	255,658
1995	162,404	59,024	8,914	-	230,324
2000	207,874	39,098	17,410	3,250	267,632
2005	204,144	26,584	29,410	4,294	264,432
2010	188,337	13,117	34,317	12,173	247,944

Notes:

1. Includes retail and wholesale demands.
2. Conserved water results in savings and is not a direct supply.
3. Total includes water supplied and conserved.

Source: City of San Diego, 2010.

Water Distribution

The PUD's water system consists of more than 3,300 miles of pipelines, including transmission lines up to 84 inches in diameter and distribution lines as small as four inches in diameter. Transmission lines are pipelines 16 inches and larger in diameter that convey raw water to the water treatment plants and convey treated water from the water treatment plants to treated water storage facilities. Distribution lines are pipelines 16 inches and smaller in diameter that directly service the retail users connected to a meter. In addition, the PUD maintains and operates 49 water pump stations that deliver treated water from the water treatment plants to more than 276,000 metered service connections in 130 different pressure zones (City of San Diego PUD, 2018). The PUD also maintains several emergency connections to and from neighboring water agencies, including:

- Santa Fe Irrigation District (Miramar WTP);
- City of Poway (Miramar WTP);
- Olivenhain Municipal Water District (Miramar WTP);
- Cal-American Water Company (Alvarado and Otay WTP);
- Sweetwater Authority (Otay WTP); and
- Otay Water District (Otay WTP).

The NCWRP is located in the Miramar area, and treats an average of 18,482 AFY of wastewater, although the plant has an ultimate treatment capability of 33,604 AFY. The Northern Service Area distribution system consists of 91 miles of recycled water pipeline, two reservoirs, and two pump stations, with service to 574 meters. The SBWRP is located near the International Border with Mexico, and treats an average of 8,961 AFY of wastewater, although the plant has a treatment capability of 16,802 AFY. The Southern Service Area distribution system consists of three miles of recycled water pipeline, one storage tank, one pump station and seven meters. There are currently no recycled water facilities or conveyances within the CPU area (City of San Diego PUD, 2018).

Sewer

Wastewater in the CPU area is managed by the PUD's Wastewater Branch, which operates the two components of the City's wastewater system: the Metropolitan Sewerage Sub-System and the Municipal Wastewater Collection Sub-System. The Metropolitan Sewerage Sub-System treats wastewater for 450 square miles and 2.2 million people. The service area includes the City of San Diego and 15 other cities and districts. The system treats an average of 180 million gallons per day (MGD) of wastewater (City of San Diego PUD, 2018).

The Municipal Wastewater Collection Sub-System is responsible for the collection and conveyance of wastewater from residences and businesses in the City of San Diego, serving a 330 square-mile area with a population of 1.3 million people. There are nine major pump stations and 75 smaller pump stations. Wastewater is conveyed via the pump stations to NCWRP, the Point Loma Wastewater Treatment Plant (PLWTP), and the SBWRP (City of San Diego PUD, 2018).

The PLWTP, located on the coast, processes approximately 175 MGD of wastewater. The plant has a treatment capacity of 240 MGD. The plant discharges to the Point Loma Ocean Outfall, a 4.5-mile long outfall that ends 320 feet below sea level (City of San Diego PUD, 2018).

The PUD also operates the Metro Biosolids Center, a state-of-the-art regional biosolids treatment facility which turns waste into dewatered biosolids that are currently used as soil amendments and landfill cover, but which may also be used to promote growth of agricultural crops. Scum from the PLWTP's surface water is digested and transported through the 17-mile Miramar Sludge Pipeline for treatment at the Biosolids Center along with solids from the NCWRP. Any remaining wastewater from the treatment process is returned to the PLWTP (City of San Diego PUD, 2018).

The PUD anticipates that planned improvements to the wastewater system will increase capacity to serve a population of 2.9 million or 340 MGD of wastewater by the year 2050 (City of San Diego PUD, 2018).

Storm Water Infrastructure

The City's storm water system is maintained by the City's Transportation and Storm Water Department, Storm Water Division. It consists of drainage and conveyance facilities such as underground storm drain pipes, culverts, outfalls, pump stations, open flood risk management channels, and more. This infrastructure collects and conveys storm water and other runoff downstream. Storm drains are designed to handle normal water flow, but occasionally during heavy rain flooding will occur.

The Storm Water Division is responsible for the inspection, maintenance, and repair of the storm drain system in the public right-of-way and in drainage easements. In addition, other City departments, such as the Parks and Recreation Department or PUD, may also have the responsibility and jurisdiction to maintain the drainage systems within their own facilities.

Nearly all storm water runoff remains within the CPU area until it drains into the San Diego River and eventually the Pacific Ocean. Mission Valley is also the recipient of storm water from adjacent communities because of the surrounding area's topography. Mission Valley's storm water channels are included under the City's Master Storm Water System Maintenance Program, which identifies specific channels and detailed methods for maintaining them. Additional discussion of the CPU area's hydrology and runoff can be found in Section 4.7: Hydrology and Water Quality, and in the Hydrology and Water Quality Report prepared for the proposed CPU (Appendix I).

Communications Systems

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. In addition, television services are available from the two satellite services, Direct TV and Dish. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed

development projects. Individual development projects consisting of more than four lots are subject to San Diego Municipal Code (SDMC) Section 144.0240, which requires privately owned utility systems and service facilities to be placed underground.

Solid Waste

The City's Environmental Services Department manages residential solid waste disposal for eligible residences in the CPU area. Refuse not eligible for the City's collection services is collected by privately operated franchised haulers. Waste generated in the City is taken primarily to three landfills: West Miramar Sanitary Landfill, Sycamore Landfill, and Otay Landfill.

- The West Miramar Landfill is located within the City of San Diego and is operated by the City. The landfill is permitted to receive a maximum of 8,000 tons of waste per day. Remaining capacity as of 2014 was 15,527,878 cubic yards. As of 2018, the estimated closure date of the facility was determined to be 2025 (CalRecycle SWIS, 2018).
- The Sycamore Landfill is operated by Republic Services and is located within the City of San Diego. The facility is permitted to receive 5,000 tons of waste per day. As of 2016, remaining capacity at this landfill was estimated to be nearly 114 million cubic yards. As of 2018, the estimated closure date for the facility was determined to be 2042 (CalRecycle SWIS, 2018).
- The Otay Landfill is located within an unincorporated area within the City of Chula Vista and is also operated by Republic Services. The facility is permitted to receive 6,700 tons of waste per day. As of 2016, remaining capacity at this landfill was estimated to be approximately 21 million cubic yards. As of 2018, the landfill's estimated cease operation date was determined to be 2030 (CalRecycle SWIS, 2018).

4.12.1.2 REGULATORY SETTING

Federal Regulations

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA), passed by Congress in 1974, authorizes the federal government to set national standards for drinking water. These National Primary Drinking Water Regulations protect against both naturally occurring and man-made contaminants. Enforceable maximum contaminant levels (MCLs) for drinking water also resulted from the SDWA. All water providers in the United States, excluding private wells serving fewer than 25 people, must treat water to remove contaminants.

The 1986 amendments to the SDWA and the 1987 amendments to the Clean Water Act (CWA) established the U.S. Environmental Protection Agency (USEPA) as the primary authority for water programs throughout the country. The USEPA is the federal agency responsible for providing clean and safe surface water, groundwater, and drinking water, and protecting and restoring aquatic ecosystems. USEPA Region 9 (Pacific Southwest) includes Arizona, California, Hawaii, Nevada, Pacific Islands, and Tribal Nations.

Clean Water Act

The Clean Water Act (CWA) (33 United States Code Section 1251 et seq.) (1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

Section 401 of the CWA requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources. The CWA was amended in 1987 to address urban runoff. One requirement of the amendment was the obligation for municipalities to obtain NPDES permits for discharges of urban runoff from their municipal separate storm sewer systems (MS4s).

State Regulations

California Department of Public Health Drinking Water Program

The California Department of Public Health Drinking Water Program conducts most enforcement activities related to water providers abiding by MCLs set by the SDWA. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers. The Drinking Water Program is within the Division of Drinking Water and Environmental Management, and San Diego falls under the Southern California Field Operation Branch in Region V, District 14. The Drinking Water Program is also responsible for the following tasks:

- Regulating public water systems;
- Certifying drinking water treatment and distribution operators;
- Supporting and promoting water system security;
- Providing support for small water systems and for improving technical, managerial, and financial capacity; and
- Providing funding opportunities for water system improvements.

Department of Water Resources

The California DWR was established in 1956 and is responsible for the operation and maintenance of the California SWP. DWR is also responsible for:

- Overseeing the statewide process of developing and updating the California Water Plan (Bulletin 160 series);
- Protecting and restoring the Sacramento–San Joaquin Delta;
- Regulating dams, providing flood protection, and assisting in emergency management;

- Educating the public about the importance of water and its proper use; and
- Providing technical assistance to service local water needs.

Senate Bills 221 and 610

Senate Bill (SB) 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of a large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential development of more than 500 units, shopping centers or businesses employing more than 1,000 people, shopping centers or businesses having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 people, and/or commercial buildings having more than 250,000 square feet of floor space or occupying more than 40 acres of land. SB 610 requires water suppliers to prepare a WSA report for inclusion by land use agencies during the California Environmental Quality Act (CEQA) process for new developments that are subject to SB 221. SB 221 and SB 610 went into effect in January of 2002 to improve the link between information on water availability and land use decisions made by cities and counties. The WSA for the proposed CPU is included as Appendix L of this PEIR.

Water Conservation Act of 2009

The Water Conservation Act of 2009 was enacted by the California legislature as SB 7 of the 7th Special Legislative Session (SB X7-7) to institute a new set of urban water conservation requirements known as “20 Percent By 2020.” These requirements stipulate that urban water agencies reduce per capita water use within their service areas by 20 percent relative to their use over the previous 10 to 15 years.

State Water Resources Control Board and Regional Water Quality Control Board

In California, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects include the SWRCB Construction General Permit, Industrial General Permit, and the regional MS4 Permit Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and R9-2015-0100, administered by the San Diego RWQCB.

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible primarily through source reduction, recycling and composting activities, and by requiring the participation of the residential, commercial, industrial, and public sectors. AB 939 called for 50 percent reduction of all solid waste from landfill disposal or transformation by January of 2000.

Assembly Bill 341

In 2011, in response to AB 939, the State of California enacted AB 341, which established a policy goal of a 75 percent reduction of solid waste by 2020 through recycling, composting, or source reduction. AB 341 requires that commercial enterprises that generate four cubic yards or more of solid waste weekly and multi-family dwellings of five units or more arrange for recycling services.

Local Regulations

MWD 2015 Regional Urban Water Management Plan

MWD's Urban Water Management Plan (UWMP) describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The plan is updated every five years. Information from MWD's UWMP is used by local water suppliers in the preparation of their own plans. The information included in MWD's UWMP represents the district's most current planning projections of demand and supply capability developed through a collaborative process with the member agencies. The MWD's UWMP does not explicitly discuss specific activities undertaken, which is the role of MWD's Integrated Water Resources Plan. The 2015 MWD UWMP found that within the MWD's service area, retail water demands can be met with local or imported supplies.

MWD 2015 Integrated Water Resources Plan

MWD's Integrated Water Resources Plan is a blueprint for long-term water supply reliability in Southern California. The fundamental goal of the plan is for Southern California to continue to have a reliable water system, considering future challenges related to prolonged droughts and changing climate.

SDCWA 2015 Urban Water Management Plan

The SDCWA developed its 2015 UWMP in coordination with its 24 member agencies. The main components of the UWMP include: baseline demand forecasts under normal weather, dry weather and climate change scenarios, conservation savings estimates and net water demand projections, a water supply assessment, supply reliability analysis, and scenario planning. SDCWA's 2015 UWMP estimates that future water demands will be about 13 percent lower in 2020 and about 12 percent lower in 2035 compared to projections in the 2010 plan.

City of San Diego General Plan

Public Facilities, Services, and Safety Element

The Public Facilities, Services, and Safety Element presents goals and policies related to storm water infrastructure, water quality, and pollution prevention. Overall goals include the protection of beneficial water resources through pollution prevention and interception efforts and implementation of a storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable. Applicable policies include measures

to ensure proper maintenance of infrastructure over time and financing for future Capital Improvement Program (CIP) projects and ensure that storm water conveyance systems, structures, and maintenance practices are consistent with permit standards.

Conservation Element

The Conservation Element addresses the management, preservation, and utilization of natural resources. The Conservation Element works together with the Public Facilities, Services, and Safety Element to provide policies on facility infrastructure and management of resources such as water and energy.

City Council Policies

Council Policy 400-04 outlines the City's Emergency Water Storage Program. The policy mandates that the PUD store sufficient water in active, available storage to meet 7.2 months (six-tenths of the annual) of normal City water demand requirements, excluding conservation. Active, available storage is defined as the portion of water that is above the lowest usable outlet of each reservoir.

Council Policy 400-13 identifies the need to provide maintenance access to all sewers to reduce the potential for spills. This policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized through the use of sensitive design, canyon-proficient maintenance vehicles, and plans that dictate routine and preventative maintenance and emergency access procedures.

Council Policy 400-14 outlines a program to evaluate the potential to redirect sewage flow out of canyons and environmentally sensitive areas to an existing or proposed sewer facility located in City streets or other accessible locations. This policy requires both a physical evaluation and a cost-benefit analysis. If redirection of flow outside the canyon is found infeasible, a Long-Term Maintenance and Emergency Access Plan specific to the canyon evaluated would be required. The plan would prescribe long-term access locations for routine maintenance and emergency repairs, along with standard operating procedures identifying cleaning methods and inspection frequency.

Council Policy 600-43 establishes a set of guidelines for the review and processing of applications for the placement and design of wireless communication facilities in accordance with the City's land use regulations. These guidelines are intended to prescribe clear, reasonable, and predictable criteria to assess applications in a consistent and expeditious manner, while reducing visual and land use impacts associated with the construction of new wireless communication facilities. For applicants seeking the placement of a wireless communication facility on City-owned land, this policy should be used in conjunction with applicable Council policies and SDMC Section 141.0420.

Council Policy 800-04 assigns maintenance of storm water conveyance facilities located on private land to those private landowners, absolving the City of responsibility.

Council Policy 800-14 establishes a prioritization process for CIP projects. Prior to inclusion in the CIP budget, the following prioritization factors are to be considered: risk to health, safety, and

environment and regulatory or mandated requirements; existing conditions, potential annual cost, and longevity; benefit towards under-served communities and economic prosperity; improvement on level and quality of service; sustainability and conservation; funding availability; project readiness; and multiple category benefit. Following inclusion into the CIP budget, the CIP Review and Advisory Committee utilizes a more detailed scoring methodology in the planning and pre-design, design, and construction phases of an infrastructure project to ensure an up-to-date and accurate assessment of the feasibility, cost, and environmental impact and mitigation.

City of San Diego Municipal Code

The SDMC contains a number of ordinances regulating public utilities. These include permitting and requirements for public sewer connections and wastewater facilities, construction waste diversion, recycling amongst City-serviced properties and residential properties, controlling non-storm water discharges, and storm water runoff and drainage from development projects.

City of San Diego Water Facility Design Guidelines

The City's Water Facility Design Guidelines identify general planning, predesign, and design details that provide uniformity in key concepts, equipment types, and construction materials for facilities being built. These design guidelines assist in providing professionally sound, efficient, uniform, and workable facilities – whether pipelines, pressure control facilities, pumping stations, or storage facilities.

Long-Range Water Resources Plan

The City's 2012 Long-Range Water Resources Plan (LRWRP) is a high-level strategy document that evaluates water supply and demand objectives against multiple planning objectives. The 2012 LRWRP was a stakeholder-driven process that evaluated over 20 water supply options such as water conservation, recycled water, groundwater storage, brackish groundwater desalination, rainwater harvesting, graywater, and potable reuse. The plan takes a long-range viewpoint through the year 2035, addressing risks and the uncertainty of future water supply conditions.

City of San Diego Urban Water Management Plan

The City of San Diego's UWMP, adopted by the City Council in June 2016, is the planning document used by water suppliers to meet the standards set forth in SB 610 and SB 221. The UWMP addresses the City's water system and includes a description of the water supply sources, magnitudes of historical and projected water use, and a comparison of water supply to water demands during normal, single-dry, and multiple-dry years. The UWMP serves as a long-range planning document for the City's water supply. The UWMP was used as the basis for the WSA prepared for the proposed CPU.

Regional MS4 Permit

The San Diego RWQCB is responsible for permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff. The Storm Water Management Unit of the RWQCB also provides important assistance in dispersing state grant funds to worthy projects that support activities for the reduction and prevention of storm water pollution. As a co-permittee for the Regional MS4 permit under the NPDES and the CWA (see State Regulations above), the City must implement several storm water management programs, including those designed to control storm water and other discharges from new development and redevelopment.

The San Diego RWQCB regulates discharges from Phase I MS4s in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego region. The Regional MS4 Permit, Order No. R9-2013-0001, was adopted on May 8, 2013 and initially covered the San Diego County co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the Orange County co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the Riverside County co-permittees. The Regional MS4 Permit expired on June 27, 2018 but remains in effect under an administrative extension until it is reissued by the San Diego Water Board. It is anticipated that the San Diego Water Board will adopt proposed changes to the Regional MS4 Permit in late 2019.

The Regional MS4 Permit requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to portions of Orange County and Riverside County within the San Diego Region (Region 9) and made other modifications.

Jurisdictional Runoff Management Plan

The City's Jurisdictional Runoff Management Plan provides a total account of how the City plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the San Diego RWQCB permit referenced above. The document describes how the City incorporates storm water best management practices (BMPs) into land use planning, development review and permitting, City CIP project planning and design, and the execution of construction contracts. See also Section 4.7, Hydrology and Water Quality.

Storm Water Management and Discharge Control Ordinance

As a co-permittee under the MS4 permit issued by the San Diego RWQCB, the City must implement storm water management programs, including programs designed to control storm water discharges from development projects both during construction and on a permanent post-construction basis. The City's Storm Water Management and Discharge Control Ordinance

addresses these requirements by requiring construction measures and permanent post-construction BMPs that are required for development projects.

Watershed Asset Management Program

The City's Storm Water Division has prepared the Watershed Asset Management Plan to identify the broad investments required to maintain the City's storm water management system. The plan is consistent with the City's general asset management practices and addresses both flood risk management and storm water quality. The plan incorporates the strategies identified in the City's Comprehensive Load Reduction Plans as a foundation for meeting the requirements and compliance standards of the MS4 permit issued by the RWQCB on May 8, 2013.

City of San Diego Storm Water Standards Manual

The City's 2018 Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the city. The Storm Water Standards Manual is contained in Appendix O of the City's Land Development Manual and is organized in three key parts:

- Part 1: BMP Design Manual - For Permanent Site Design, Storm Water Treatment and Hydromodification Management
- Part 2: Construction BMP Standards
- Part 3: Offsite Storm Water Alternative Compliance Program for Water Quality and Hydromodification Control

Part 1 of the Storm Water Standards Manual, the BMP Design Manual, addresses and provides guidance for complying with on-site post-construction storm water requirements for Standard Projects and Priority Development Projects (PDPs), and provides procedures for planning, preliminary design, selection, and design of permanent storm water BMPs based on the performance standards presented in the MS4 Permit.

Part 2 of the Storm Water Standards Manual addresses storm water impacts and required controls associated with construction activities in the City. The purpose of these standards is to provide guidance to prevent construction activities from adversely impacting downstream and on-site resources through appropriate planning, installation, and maintenance of BMPs. The construction BMP standards provide guidance on providing the appropriate BMPs to prevent discharges of pollutants associated with construction activity.

Part 3 of the Storm Water Standards Manual addresses the Offsite Storm Water Alternative Compliance Program (Offsite Alternative Compliance Program) developed by the City to allow mitigation of PDP storm water impacts through implementation of off-site structural BMPs. The program allows for offsite control of water quality and hydromodification impacts, provides design options and flexibility in the case of site infeasibility, and provides the potential for more effective regional storm water control solutions to improve watershed scale water quality.

Master Storm Water System Maintenance Program

The City of San Diego maintains a Master Storm Water System Maintenance Program for flood control facilities in neighborhoods across the City. The program allows the City to better identify flood control channels requiring maintenance services over a five-year period. Each fiscal year, the City will identify a small group of channels that have deposits of sediment and overgrowth of vegetation requiring maintenance to restore flood control capacity. The maintenance program was last updated in January 2018 and includes a list of maintenance protocols to be incorporated into maintenance activities to protect sensitive environmental resources per the Mitigation, Monitoring, and Reporting Program established through the PEIR for the maintenance program.

City of San Diego Sewer Design Guide

The City's Sewer Design Guide sets forth criteria to be used for the design of sewer systems, which may consist of pump stations, gravity sewers, force mains, and related appurtenances. The guide includes criteria for determining pump station, gravity sewer, and force main capacity and sizing; alignment of gravity sewers and force mains; estimating wastewater flow rates; designing bridge crossings; and corrosion control requirements.

City of San Diego Climate Action Plan

The City of San Diego's Climate Action Plan (CAP) aims to reduce landfill waste by promoting the 75 percent waste diversion by 2020 goal and a Zero Waste by 2040 goal. To accomplish these goals, the CAP includes measures to implement new water rates and billing structures, as well as other new or updated ordinances and programs, such as a Residential Energy Conservation and Disclosure Ordinance and an Outdoor Landscaping Ordinance.

Waste Management Plans

Pursuant to the City's CEQA Significance Determination Thresholds (2016), land development projects more than 40,000 square feet that may generate approximately 60 tons of waste or more during construction and/or operation are required to prepare a project-specific Waste Management Plan (WMP) to address disposal of waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals.

4.12.2 Impact Analysis

4.12.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to public utilities and infrastructure are based on the City's CEQA Significance Determination Thresholds (2016), which have been adapted to guide a programmatic analysis for the proposed CPU. A significant impact to public utilities and infrastructure could occur if the proposed CPU would:

- 1) Result in the use of excessive amounts of water beyond projected available supplies;
- 2) Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts, in order to maintain service ratios or other performance objectives; or
- 3) Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan.

4.12.2.2 METHODOLOGY AND ASSUMPTIONS

Potential impacts resulting from implementation of the proposed CPU were evaluated based on relevant regulations and development guidelines of the SDMC; existing conditions; San Diego Association of Governments (SANDAG) Series 13 Regional Growth Forecasts; and data on existing facilities and projected capacity needs found in online documentation and the CalRecycle Solid Waste Information System Database (SWIS).

The PUD prepared a WSA for the proposed CPU in January of 2018 (Appendix L). The WSA identifies existing water supply entitlements, water rights, and water service contracts or agreements relevant to the identified water supply for the project. The methodology used to establish assumptions for the WSA is included in Appendix M. The WSA projected water supply and demand based on a normal year, a single-dry year, and a multiple-dry year period.

4.12.2.3 IMPACTS

Impact 4.12-1: Water Supply

Would the proposed CPU use excessive amounts of water beyond projected available supplies?

The MWD and SDCWA have developed water supply plans to improve reliability and reduce dependence on existing imported supplies. MWD's UWMP and Integrated Water Resources Plan, along with the SDCWA's 2015 UWMP and annual water supply report, include water infrastructure projects that meet long-term supply needs by securing water from the SWP, Colorado River, local water supply development, and recycled water.

As discussed in the WSA, the City's 2015 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur within the City by 2040. Based on a normal water supply year, the estimated water supply projected in five-year increments for a 20-year projection would meet San Diego's projected water demand of 200,984 AF in 2020 and 273,408 AF in 2040. Based on a single-dry year forecast, the estimated water supply would meet the City's projected increased water demand of 290,292 AF in 2040. Based on a multiple-dry year water supply, the estimated supply would meet the citywide projected demands of 208,665 AF in 2020 and 284,058 AF in 2040.

As demonstrated in the WSA, there is sufficient water planned to supply the proposed CPU's estimated annual average usage. The WSA considers water demand projections for the CPU area through 2040, based on the City's 2015 UWMP, which used population and employment forecasts provided in the SANDAG Series 13 Forecast for 2040. While projected residential buildout of the proposed CPU is expected to be greater than what the Series 13 Forecast projected for 2040, it is anticipated that demand for, and therefore utilization of, additional units would not occur prior to 2040. As the SANDAG Series 13 Forecast for 2050 only projects demand for 658 additional units above the 2040 forecast, it is assumed that utilization of most of the remaining units would not occur until sometime after 2050 (see Appendix M for further detail regarding the WSA methodology). Because the water demand for the portion of the proposed CPU buildout expected to occur through 2040 is consistent with water supplies projected for 2040 in the 2015 UWMP, the WSA concluded that there would be no water shortages resulting from development under the proposed CPU.

The WSA concluded that the proposed CPU is consistent with the water demand assumptions included in the regional water resource planning documents of the SDCWA and MWD. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve the projected demands of the CPU area, in addition to existing and planned future water demand forecasted by the PUD. The General Plan as well as the proposed CPU also include policies that encourage water conservation. Impacts related to water supply would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.12-2: Utilities

Would the proposed CPU promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts, in order to maintain service ratios or other performance objectives?

Implementation of the proposed CPU would result in redevelopment occurring in villages and districts with their own distinct range of uses. The City's existing built areas are currently served by storm water, sewer, potable water distribution, and communications systems infrastructure. However, some areas within the CPU area have existing infrastructure deficiencies and may require capacity improvements to serve the existing and projected population.

Storm Water

As discussed in Section 4.7: Hydrology and Water Quality, because the proposed CPU covers a highly impervious area and there is limited land available for new development, the volume or rates of runoff are not likely to be substantially increased by new or further development. It is more likely that the volume and rate of runoff could be slightly decreased due to implementation of current City storm water regulations. As new development occurs, implementation of Low Impact Development (LID) practices that help retain storm water on-site for infiltration, re-use, or evaporation would be required by the City's Storm Water Standards.

~~While no storm drains or other community-wide drainage facilities are proposed for construction in conjunction with implementation of the proposed CPU, future development occurring under the proposed CPU could result in a need for the installation of new storm water infrastructure. The need for new storm water infrastructure would rely on the condition of existing infrastructure, development patterns, and development standards. The City assesses the condition of its storm water facilities on a continuous basis through programs such as the Master Storm Water System Maintenance Program and Watershed Asset Management Program.~~

Per Council Policy 800-14, the City's CIP program has established a scoring methodology to prioritize funding for infrastructure projects, including the construction of new stormwater infrastructure. Project-level review for future stormwater facilities would be required since details are not currently known. Physical impacts associated with the construction of storm water facilities from implementation of the proposed CPU could be significant and unavoidable.

Sewer

Sewer line upgrades are administered by the Public Works Department (PWD) and are handled on a project-by-project basis. No new sewer collection or wastewater treatment facilities are proposed in conjunction with the proposed CPU, and the location and extent of future facilities would not be established until such time that individual projects are proposed. Any future development would be required to follow the City's Sewer Design Guide and to comply with SDMC Chapter 6, Article 4 regulations regarding sewer and wastewater facilities. Project-level review for future sewer facilities would be required since details are not currently known. Physical impacts associated with the construction of sewer facilities from implementation of the proposed CPU could be significant and unavoidable.

Water Distribution Facilities

No new water distribution or treatment facilities are proposed in conjunction with the proposed CPU. Nevertheless, as future development takes place in the CPU area, demand for water is likely to increase and create a potential need to increase the sizing of existing pipelines and mains. The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's CIP. These improvements are determined based on continuous monitoring by the PWD Engineering Division to determine remaining levels of capacity. The PWD Engineering Division plans its CIP projects several years prior to pipelines reaching capacity. Such improvements are required of the water system regardless of implementation of the proposed CPU. Project-level review for future water distribution facilities would be required since details are not currently known. Physical impacts associated with the construction of water distribution facilities from implementation of the proposed CPU could be significant and unavoidable.

Communications Systems

Private utility companies currently provide communications systems within the CPU area. New development may result in the need for new communications systems; however, no specific systems upgrades are proposed with this project, and the location and extent of future facilities is not known at this time. Future siting of communications infrastructure would be in accordance with the SDMC, including Section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts in accordance with the City's General Plan. Project-level review for future communications systems facilities would be required since details are not currently known. Physical impacts associated with the construction of communications systems facilities from implementation of the proposed CPU could be significant and unavoidable.

Mitigation Measures

Impacts would be significant and unavoidable since impacts associated with the construction of future utilities are not known. Future development of utilities infrastructure would be subject to project-level review.

Impact 4.12-3: Solid Waste Management

Would the proposed CPU result in impacts to solid waste management resulting in the need for construction of new solid waste infrastructure, including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75-percent target for waste diversion, as required under AB 341 and the City's Climate Action Plan?

CalRecycle provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste created by residences or businesses over a specified amount of time. Waste generation rates include all materials discarded, whether or not they are later recycled or disposed of in a landfill, because under state law the total amount of waste "generated" is considered to be the sum of the waste "disposed of" plus the waste "diverted" from disposal. Waste generation rates can be used to estimate the impact of new development on local solid waste infrastructure. However, it should be noted that impacts to solid waste infrastructure

are not necessarily the amount of waste generated, but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services.

The proposed CPU proposes denser development compared to the current Community Plan (see Table 4.12-2). While some land uses would decrease under the proposed CPU, increases in certain types and amounts of other land uses would cause an overall net increase in solid waste generation. The largest decrease in solid waste generation would come from the expected reduction in hospital/clinic land uses and the largest increase in solid waste generation would come from the expected growth in multi-family residential land use.

Regardless of implementation of the proposed CPU, any future projects that would occur in the CPU area would require compliance with existing City regulations described in the Regulatory Setting above. Additionally, as discussed in the Environmental Setting above, the landfills currently serving the CPU area and City of San Diego have sufficient remaining capacity to handle the increase in solid waste generation resulting from implementation of the proposed CPU as estimated in Table 4.12-2. Thus, the proposed CPU would have less than significant impacts on solid waste management and would not require the construction of new facilities.

Table 4.12-2: Estimated Change in Waste Generation Based on Land Use

<i>Land Use Type</i>	<i>Unit</i>	<i>Waste Generation Rate (lb/unit/day)</i>	<i>Unit Change (2012 to 2050)</i>	<i>Change in Waste Generation (lb/day)</i>
Single Family Residential	Dwelling Unit	10	0	0
Multi-Family Residential	Dwelling Unit	4	27,913	111,652
Commercial/Retail	Square Footage	0.046	2,012,997	92,598
Office	Square Footage	0.006	4,668,685	28,012
Motel/Hotel	Rooms	2	1,553	3,106
Industrial	Square Footage	0.006	-482,499	-2895
Institutional/Community	Square Footage	0.007	36,519	256
Hospital/Clinic	Square Footage	0.18	-24,420	-4396
Universities/Colleges	Square Footage	0.002	-58,414	-117
Schools K-12	Square Footage	0.007	9,450	66
Recreational	Square Footage	0.0312	495,097	15,447
Total				243,729

Sources: City of San Diego, 2018; CalRecycle, 2018.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

4.13 Transportation

This section assesses potential environmental impacts on the transportation system from future development under the proposed CPU, including those related to traffic circulation and the alternative transportation network. The study area for this section includes the CPU area as well as nearby roadway segments and intersections as described in the Physical Setting below. This section describes the existing transportation system, characteristics, and operations of the CPU area, as well as relevant federal, State, and local regulations and programs. Information and analysis presented in this section are based on the Transportation Impact Study (TIS) prepared by Chen Ryan Associates, Inc. in January 2019 for the Mission Valley CPU as well as the Existing Conditions Map Atlas prepared for the CPU (Dyett & Bhatia, 2016). The TIS is included as Appendix D to this PEIR.¹ The TIS results pertinent to the proposed CPU are presented in this section.

4.13.1 Environmental Setting

4.13.1.1 PHYSICAL SETTING

Study Area

The study area for this section includes the CPU area as well as roadways and intersections outside of the CPU area that provide access to the community. Study segments and intersections are as follows:

- All roadways identified in the proposed CPU and the adopted Community Plan (existing, planned, and proposed), and approximately one segment beyond the CPU area.
- All ramp intersections that provide access to the community, and intersections where each street meets one of the following conditions:
 - Four or more lanes;
 - Three-lane roadways carrying more than 15,000 average daily trips (ADT); or
 - Two-lane roadways carrying more than 10,000 ADT.

A total of 67 study intersections were identified based on the above criteria under existing conditions. Due to the projected increase in traffic volumes and new roadway connections under future year conditions, an additional 14 intersections were added for a total of 81 intersections.

1. The Proposed CPU land use and network are referred to as the Cross-Valley Connection Alternative in the TIS.

Existing Roadway and Freeway Network

This section provides a description of the existing roadway and freeway network within the study area. The portions of the roadways described are intended to reflect the areas within the study area and may not reflect the entirety of the roadway. Functional classifications are based on field observations performed in year 2015 during the preparation of the Existing Conditions Map Atlas (Dyett & Bhatia, 2016). Figure 4.13-1 illustrates the existing roadway functional classification for the study area.

Existing East-West Roadways

- **Phyllis Place** is a two-lane roadway with a striped median between the Interstate (I-) 805 northbound ramps and the I-805 southbound ramps. Sidewalk is present on the north side of the roadway. A Class III bike route is provided. Parking is permitted on both sides of the roadway. Speed limits are not posted.
- **Sea World Drive** is a four-lane roadway. Between Mission Bay Parkway and Friars Road, a raised median is present. Class II bicycle facilities are present on both sides of the roadway along this segment. Sidewalks are not present along this segment. Between Friars Road and the I-5 southbound ramps, Sea World Drive has a striped median. Sidewalks are present along the south side of the roadway. On-street parking is prohibited. Speed limits are not posted.
- **Tecolote Road** is a four-lane roadway with a raised median. Class II bicycle facilities and sidewalks are present on both sides of the roadway. On-street parking is prohibited on both sides of Tecolote Road. Speed limits are not posted.
- **Mission Valley Road** is a four-lane roadway with a raised median and a posted speed limit of 25 miles per hour (mph) between Metropolitan Drive and Mission Center Road. Sidewalks and Class II bicycle facilities are present on both sides of the roadway. Parking is prohibited on both sides of the roadway. San Diego Metropolitan Transit System (MTS) routes 25 and 928 run along the roadway between Metropolitan Drive and Mission Center Road.
- **Civita Boulevard** is a four-lane roadway with a landscaped raised median and no posted speed limit. Sidewalks, as well as Class II bicycle facilities, are present on both sides of the roadway. Parallel parking is permitted on both sides of the roadway.
- **Westside Drive** is a two-lane undivided roadway with a posted speed limit of 25 mph. Sidewalks are present on both sides of the roadway, and no bicycle facilities are provided. Parallel and angled parking is permitted on both sides of the roadway.
- **Friars Road** is a four-lane roadway with a striped median and a posted speed limit of 55 mph between Sea World Drive and Napa Street. East of Napa Street, Friars Road becomes a four-lane roadway with a raised median and a posted speed limit of 45 mph until reaching Colusa Street. East of Colusa Street, Friars Road continues as a four-lane roadway, but its median varies between a center left-turn lane and a striped median until reaching Via Las Cumbres. East of Via Las Cumbres, Friars Road is a four-lane roadway with a center left-turn lane and a posted speed limit of 45 mph until reaching Fashion Valley Road. East of Fashion Valley Road, Friars Road transitions to a five-lane roadway with a raised median

and a posted speed limit of 45 mph until reaching Avenida De Las Tiendas. East of Avenida De Las Tiendas, Friars Road transitions into a six-lane roadway with a raised median and no posted speed limit until reaching the State Route (SR-) 163 northbound ramps. East of the SR-163 northbound ramps, Friars Road is a six-lane roadway with a raised median and posted speed limit of 45 mph until reaching Frazee Road. East of Frazee Road, Friars Road is an eight-lane roadway with a striped median for approximately 1,500 feet, then its median transitions into a K-Rail median, and finally changes into a striped median approximately 1,600 feet before reaching Qualcomm Way. East of Qualcomm Way, Friars Road becomes a seven-lane roadway with a raised median until reaching Rio Bonito Drive, then narrowing to six lanes until Northside Drive. East of Northside Drive, Friars Road continues as a seven-lane roadway, and its median transitions from a raised median to a K-Rail median until reaching the I-15 southbound ramps. East of the I-15 southbound ramps, Friars Road has a striped median and a posted speed limit of 45 mph until reaching Santo Road. East of Santo Road, Friars Road is a six-lane roadway with a raised median and a posted speed limit of 45 mph until reaching its eastern terminus at Mission Gorge Road.

Sidewalks are present on both sides of the roadway along the entire extent of Friars Road between Sea World Drive and Mission Gorge Road, with the exception of approximately 577 feet on each side of the road to the east of Sea World Drive, a section near Ulric Street and the SR-163 southbound ramps where sidewalks are only present along the south side of the roadway, expressway segments where sidewalks follow expressway exits, and between Mission Village Drive and the I-15 southbound ramps where sidewalks are not present. Bicycle facilities are present along Friars Road, including a two-way Cycle Track on the south side of the roadway between Sea World Drive and approximately 900 feet west of Fashion Valley Road, as well as Class II bicycle facilities intermittently present on both sides of the roadway. Parking is generally prohibited along the roadway, with some exceptions between Napa Street and Ulric Street/SR-163 southbound ramps. MTS bus route 14 runs along Friars Road between Rancho Mission Road and Mission Gorge Road. Additionally, several transit routes run between Fashion Valley Road and SR-163 to access the freeway, such as route 20 and 41. Route 120 runs between Fashion Valley Road and Ulric Street, and routes 25 and 928 run between Fashion Valley Road and Frazee Road.

- **Mission Gorge Road** is a six-lane roadway with a center left-turn lane between Friars Road and Zion Avenue. On-street parking is prohibited on both sides of the roadway. Sidewalks are present on both sides of the roadway. Class II bicycle facilities are present along the north side of the roadway.
- **Hazard Center Drive** is a four-lane roadway. The median varies between a striped median and a raised median, with no posted speed limit, between its western terminus and Frazee Road. East of Frazee Road, Hazard Center Drive is a four-lane roadway with a raised median and no posted speed limit. Sidewalks are present on both sides of the roadway, but no bicycle facilities are provided. Parking is permitted on both sides of the roadway. As of 2019, Hazard Center Drive is currently under construction.
- **Rio San Diego Drive** is a four-lane roadway with a posted speed limit of 40 mph. The roadway has a raised median between Gill Village Way and Qualcomm Way. East of Qualcomm Way, Rio San Diego Drive is a four-lane roadway with a raised median for approximately 477 feet, after which its median transitions to a center left-turn lane, then to a raised median, until reaching its eastern terminus at Fenton Parkway. Sidewalks are

present on both sides of the roadway. Class II bicycle facilities are present on both sides of the roadway between Gill Village Way and Qualcomm Way. Parking is prohibited between Gill Village Way and Qualcomm Way, but generally permitted between Qualcomm Way and Fenton Parkway.

- **San Diego Mission Road** is a four-lane undivided roadway with a posted speed limit of 40 mph between Mission Village Drive and Rancho Mission Road. East of Rancho Mission Road, San Diego Mission Road is a two-lane roadway with a center left-turn lane and a posted speed limit of 35 mph, until reaching its eastern terminus at Fairmount Avenue. Sidewalks are present intermittently on both sides of the roadway. Class II bicycle facilities are present on both sides of the roadway east of Rancho Mission Road. Parking is intermittently permitted along San Diego Mission Road. MTS route 14 runs along this roadway between Friars Road and the southern terminus of the road, where the roadway's name changes to Ward Road.
- **Taylor Street** is a five-lane roadway with a striped median between Pacific Highway and Morena Boulevard with a posted speed of 35 mph. Sidewalks are present on both sides of the roadway in this segment, although bicycle facilities are not present. Between Morena Boulevard and Hotel Circle South, Taylor Street reduces to a two-lane roadway with a striped median. Class II bicycle facilities are present on the south side of the road between Morena Boulevard and the I-8 eastbound ramps. There are no sidewalks present east of Morena Boulevard. On-street parking is prohibited along Taylor Street. MTS routes 44, 88 and 105 run along the roadway between the Old Town Transit Center and Morena Boulevard, whereas Route 88 continues to run along Taylor Street to the roadway's terminus at Hotel Circle South.
- **Hotel Circle North** is a two-lane roadway with a center left-turn lane and a posted speed limit of 35 mph between Hotel Circle Place and the I-8 westbound ramps. East of the I-8 westbound ramps, Hotel Circle North is a two-lane undivided roadway with a posted speed limit of 35 mph until reaching Fashion Valley Road. East of Fashion Valley Road, Hotel Circle North is a two-lane roadway with a center left-turn lane until reaching its terminus at Camino De La Reina. Sidewalks are present only on the north side of the roadway, with an exception east of Fashion Valley Road, where approximately 800 feet of sidewalk is missing. Class II bicycle facilities are present on both sides of the roadway between Hotel Circle Place and the I-8 westbound ramps. Parking is prohibited along the entire extent of the roadway. Several transit routes run along Hotel Circle North between the I-8 westbound ramps and Fashion Valley Road to access the Fashion Valley Transit Center, such as routes 20 and 120. In addition, Route 88 runs along the entirety of the roadway.
- **Camino De La Reina** is a two-lane roadway with a center left-turn lane and a posted speed limit of 25 mph between Hotel Circle North and Avenida Del Rio. East of Avenida Del Rio, Camino De La Reina continues to be a two-lane roadway with a posted speed limit of 30 mph, but transitions to a striped median for approximately 300 feet, before transitioning to a raised median before reaching Camino De La Siesta. East of Camino De La Siesta, Camino De La Reina is a four-lane roadway with a raised median and a posted speed limit of 35 mph until reaching Mission Center Road. East of Mission Center Road, Camino De La Reina is a four-lane undivided roadway for approximately 930 feet, before its median transitions to a raised median prior to reaching Park In The Valley Driveway. East of Park In The Valley Driveway, Camino De La Reina continues as a four-lane roadway with a

raised median. Sidewalks are present along both sides of the roadway, although there are no bicycle facilities. On-street parking is generally permitted east of Camino De La Siesta. MTS Route 6 runs along Camino De La Reina between Avenida Del Rio and Camino Del Este in both directions, as well as between Camino Del Este and Qualcomm Way in the eastbound direction.

- **Camino Del Rio North** is a two-lane roadway between Camino De La Siesta and Mission Center Road. Between Mission Center Road and the I-8 westbound ramps, Camino Del Rio North becomes a four-lane road. Between the I-8 westbound ramps and Camino Del Este, Camino Del Rio North becomes a three-lane road. Between Camino Del Este and Mission City Parkway, Camino Del Rio South becomes a four-lane roadway, before reducing to two lanes until Ward Road. Between Ward Road and Fairmount Avenue, Camino Del Rio North expands again to four lanes. Camino Del Rio South has a raised median between Camino De La Siesta and Mission City Parkway, and alternates between a striped median and a center left-turn lane between Mission City Parkway and Fairmount Avenue. A posted speed limit of 35 mph is present at the I-8 westbound ramps, with an increase to 45 mph at Qualcomm Way. On-street parking is prohibited, except between Camino De La Siesta and Mission Center Road. Sidewalks are located along the north side of the road between Camino De La Siesta and the I-8 westbound ramps, Camino Del Este and Qualcomm Way, and from approximately 800 feet east of Mission City Parkway to Fairmount Avenue. Sidewalks also exist along both sides of the road between Qualcomm Way and Mission City Parkway. Class II bicycle facilities are intermittent as well and are present along both sides of the roadway between Qualcomm Way and Mission City Parkway, and from approximately 1,800 feet West of Ward Road to Fairmount Avenue. Class III sharrows are present between Camino Del Rio North and 1,800 feet west of Ward Road. MTS Route 6 runs along Camino Del Rio North between Camino Del Este and Qualcomm way in the eastbound direction. MTS Route 14 runs along the roadway between Ward Road and the Grantville Trolley Station. Additionally, Route 18 runs along the roadway between the Grantville Trolley Station and Mission City Parkway in the westbound direction, as well as between Qualcomm Way and Mission City Parkway in the eastbound direction.
- **Hotel Circle South** is a two-lane undivided roadway with a posted speed limit of 35 mph between the I-8 over-cross and approximately 1,270 feet to the east, where Hotel Circle South becomes a two-lane roadway with a center left-turn lane until reaching its eastern terminus at Hotel Circle North. Sidewalks are present only on the south side of the roadway, with the exception of between the I-8 over-cross and approximately 1,270 feet to the east, where sidewalks are missing. Pavement markings indicating a Class III bicycle route are present between the I-8 overpass and the I-8 westbound ramps. East of the I-8 westbound ramps, Class II bicycle facilities are present on both sides of the roadway. Parking is generally prohibited on both sides of the roadway, aside from a short segment west of the I-8 eastbound ramps. Several transit routes run along the roadway between Hotel Circle North and the I-8 eastbound ramps to access the freeway, such as routes 20 and 120. In addition, Route 88 runs along the entirety of the roadway.
- **Camino Del Rio South** is a predominantly two-lane roadway, which widens to three lanes between Mission City Parkway and the I-15 southbound off-ramp. Camino Del Rio South widens to four lanes between the I-15 southbound off-ramp and the I-15 southbound on-

ramp, and narrows to two lanes between the I-15 southbound on-ramp and Fairmount Avenue. Camino Del Rio South has a center left-turn lane from approximately 1,800 feet west of Mission Center Road/Auto Circle to Mission Center Road/Auto Circle, and from Mission City Parkway ramp to Fairmount Avenue. Camino Del Rio South has a posted speed limit of 25 mph between its western terminus and approximately 1,800 feet west of Mission Center Road. There is a posted speed of 35 mph between Mission Center Road and Mission City Parkway, a posted speed of 45 mph between Mission City Parkway and the I-15 southbound off-ramp, and a posted speed of 40 mph between the I-15 southbound off-ramp and Fairmount Avenue. On-street Parking is allowed along the south side of the roadway between approximately 1,800 feet west of Mission Center Road and Texas Street, between Mission City Parkway and the I-15 southbound off-ramp, and between the I-15 southbound on-ramp and Fairmount Avenue. Sidewalks are present along the south side of the entire roadway and are present on both sides of the roadway between the western terminus of Camino Del Rio South and approximately 1,800 feet west of Mission Center Road. Bicycle facilities are not provided, except between Mission Center Road and Texas Street, where Class II bicycle facilities are present on both sides of the roadway.

Existing North-South Roadways

- **Morena Boulevard** is a two-lane roadway with a center left-turn lane and a posted speed limit of 35 mph between Tecolote Road and West Morena Boulevard. Between West Morena Boulevard and the I-8 westbound off-ramps, Morena Boulevard widens to four lanes and has a raised median, with a posted speed limit of 40 mph. Morena Boulevard narrows to three lanes south of the I-8 westbound off-ramps, with two northbound lanes and one southbound lane. On-street parking is only permitted between Tecolote Road and West Morena Boulevard. Sidewalks and Class II bicycle facilities are present on both sides of the roadway, although the I-5 overpass lacks bicycle facilities. MTS routes 44 and 105 run along the roadway between Taylor Street and Linda Vista Road, and Route 105 continues along the roadway to Milton Street, north of Tecolote Road.
- **Napa Street** is a four-lane roadway with a striped median and a posted speed limit of 25 mph. On-street parking is permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, but there are no bicycle facilities.
- **Colusa Street** is a two-lane roadway with a striped median and a posted speed limit of 25 mph. On-street parking is permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, but there are no bicycle facilities.
- **Via Las Cumbres** is a three-lane roadway with two northbound lanes, one southbound lane, and a striped median. A speed limit is not posted in the segment studied, between Linda Vista Road and Friars Road. On-street parking is permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, although segments are missing along the east side of the roadway. Class II bicycle facilities are present on the east side of the roadway.
- **Fashion Valley Road** is a four-lane roadway with a striped median. A speed limit is not posted. On-street parking is not permitted. Sidewalks are present on both sides of the roadway. There are no bicycle facilities present. Fashion Valley Road is used by many

transit routes to access the Fashion Valley Transit Center, including MTS routes 20, 25, 41, 88, 120, and 928.

- **Bachman Place** is a two-lane undivided roadway with a posted speed limit of 40 mph. Sidewalks are present along the west side of the roadway. On-street parking is permitted on the west side of the roadway only. There are no bicycle facilities present.
- **Avenida Del Rio** is a four-lane roadway with a center left-turn lane and no posted speed limit. On-street parking is not permitted. Sidewalks are present along the along both sides of the roadway, although sections are missing along the east side. There are no bicycle facilities present. The roadway is used by MTS Route 6 to access the Fashion Valley Transit Center.
- **Ulric Street** is three-lane roadway with two northbound lanes and one southbound lane and a striped median between Friars Road and approximately 600 feet south of Fashion Hills Boulevard. North of that point, Ulric Street narrows to a two-lane roadway. Ulric Street has a posted speed limit of 40 mph. On-street parking is not permitted. Sidewalks are present along the west side of the roadway, and Class II bicycle facilities are present on both sides of the roadway. MTS Route 120 runs along this roadway between Friars Road and Linda Vista Road.
- **Camino De La Siesta** is a two-lane undivided roadway with a posted speed limit of 25 mph. On-street parking is generally permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, although there are no bicycle facilities present.
- **Metropolitan Drive** is a three-lane roadway with two northbound lanes and one southbound lane. A center left-turn lane is present. There is a posted speed limit of 25 mph. On-street parking is permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, although there are no bicycle facilities present. MTS routes 25 and 928 run along Metropolitan Drive, between Murray Canyon Road and Mission Valley Road.
- **Murray Canyon Road** is a three-lane roadway with two northbound lanes and one southbound lane. A center left-turn lane is present. There is no posted speed limit. On-street parking is permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway, although there are no bicycle facilities present. MTS routes 25 and 928 run along Murray Canyon Road between Frazee Road and Metropolitan Drive.
- **Frazee Road** is a four-lane roadway with a raised median and no posted speed limit. On-street parking is intermittently permitted on both sides of the roadway. Sidewalks are present on both sides of the roadway. There are no bicycle facilities present. MTS routes 25 and 928 runs along Frazee Road between Friars Road and Murray Canyon Road.
- **Mission Center Road** is a two-lane roadway between Murray Ridge Road and approximately 1,200 feet west of Murray Ridge Road. The roadway expands to two northbound and one southbound lanes until approximately 950 feet north of Mission Valley Road. From Mission Valley Road to Westside Drive, Mission Center Road expands to four lanes, and again to five lanes between Westside Drive and the Friars Road westbound ramps. Mission Center Road becomes a four-lane roadway once again until Mission Center Court, and expands to five lanes between Mission Center Court and Camino Del Rio North. Posted speed limits are 45 mph between Murray Ridge Road and

approximately 950 feet north of Mission Valley Road, with a reduction to 40 mph for the remainder of the roadway. There is no on-street parking permitted. Sidewalks are generally present, except between Murray Ridge Road and approximately 950 feet north of Mission Valley Road. Class II bicycle facilities are present along both sides of the roadway. MTS routes 25 and 928 run along Mission Center Road between Mission Valley Road and Murray Ridge Road.

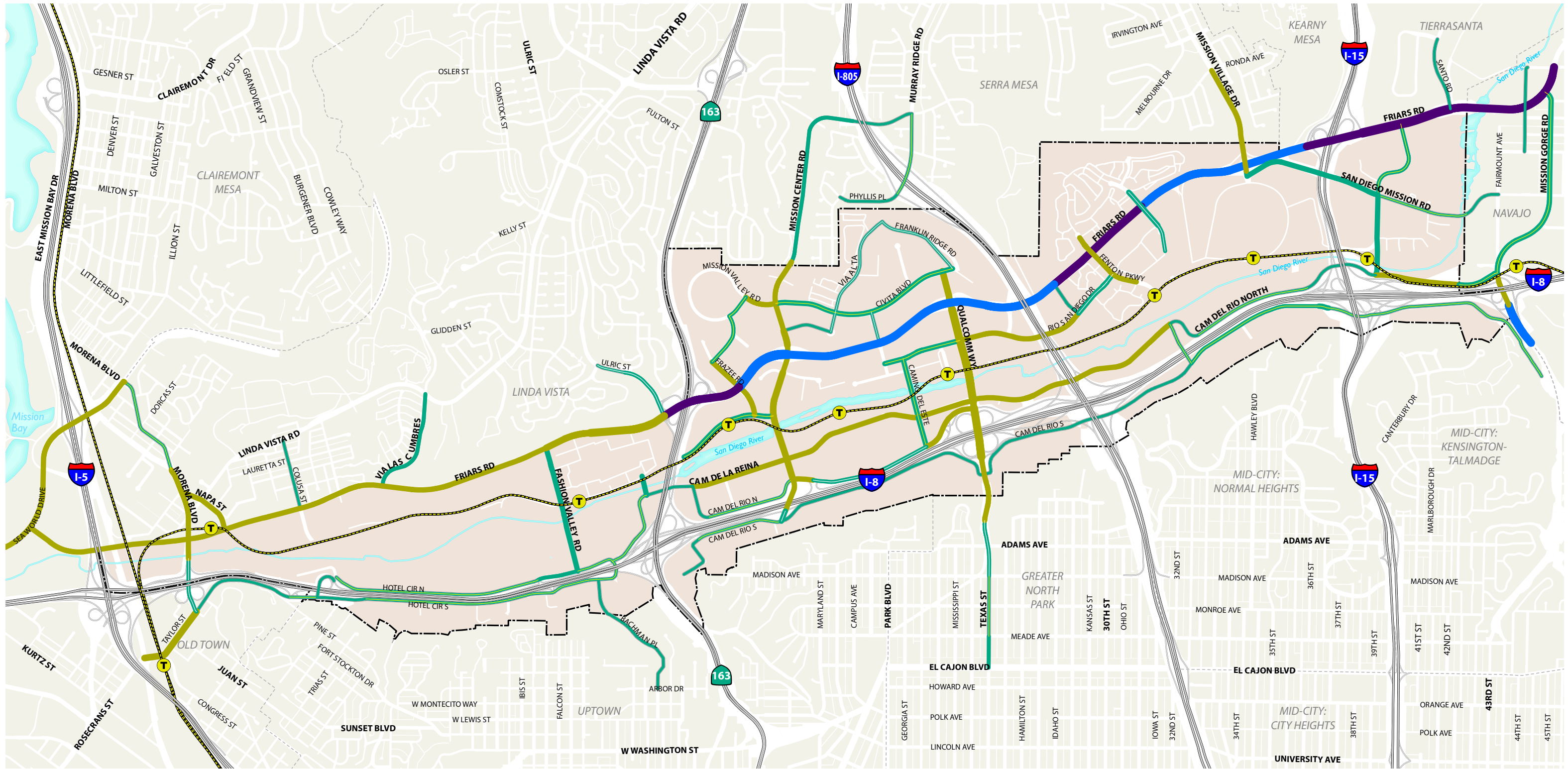
- **Auto Circle** begins at the southern terminus of Mission Center Road and continues to Camino Del Rio South. Auto Circle is a four-lane roadway with a striped median between Camino Del Rio South and the I-8 eastbound ramps, and a raised median south of the I-8 eastbound ramps. There is no posted speed limit along the roadway. Sidewalks are present along the west side of the roadway. Class II bicycle facilities are present between Camino Del Rio North and the I-8 eastbound ramps. On-street parking is not permitted along the roadway.
- **Via Alta** is a two-lane roadway between Westside Drive and Franklin Ridge Road with a raised median. There is no posted speed limit. On-street parking is prohibited. Sidewalks and Class II bicycle facilities are present on both sides of the roadway.
- **Murray Ridge Road** is a two-lane road with a center left-turn lane between Mission Center Road and the I-805 northbound ramps, and a striped median between the I-805 northbound and I-805 southbound ramps. There is a posted speed limit of 25 mph, which increases to 35 mph approximately 250 feet north of Mission Center Road. On-street parking is allowed north of the I-805 northbound ramps. Sidewalks and Class II bicycle facilities are present along both sides of the roadway.
- **Russell Park Way** is a two-lane roadway with a raised median. There is no posted speed limit. On-street parallel parking is permitted on the west side of the roadway. Sidewalks and Class II bicycle facilities are present on both sides of the roadway.
- **Camino Del Este** is a four-lane roadway that alternates between a raised median, striped median, and center left-turn lane. North of Camino De La Reina, the posted speed limit is 35 mph. South of Camino De La Reina, the posted speed limit is reduced to 25 mph. On-street parking is only permitted south of Camino De La Reina. Sidewalks are present along both sides of the roadway. Class II bicycle lanes are present north of Camino De La Reina. MTS Route 6 runs along Camino Del Este between Camino De La Reina and Camino Del Rio North in the northbound direction.
- **Franklin Ridge Road** is a planned roadway that will provide north-south travel as a modified two-lane road with a center median. The roadway will be classified as a two-lane major street. It will begin at the eastern terminus of Civita Boulevard and run northerly to connect with Via Alta. Parking will be prohibited on both sides of Franklin Ridge Road, and it is planned to have Class II bike lanes.
- **Qualcomm Way** is a two-lane roadway between the Friars Road westbound ramps and the Friars Road eastbound ramps. Qualcomm Way widens to six lanes between the Friars Road eastbound ramps and Camino Del Rio North. South of Camino Del Rio North, Qualcomm Way narrows to five lanes, before narrowing again to four lanes through the Camino Del Rio South, where the roadway changes names to Texas Street. Qualcomm Way is generally an undivided roadway, with a center left-turn lane between the Friars Road eastbound

ramps and Friars Road westbound ramps, a raised median between the Friars Road westbound ramps and Rio San Diego Drive, and a striped median between Rio San Diego Drive and Camino Del Rio North. Qualcomm Way has no posted speed limits, and has intermittent on-street parking, generally between the Friars Road eastbound ramps and Rio San Diego Drive. Sidewalks are generally present, except for the east side of the roadway between Camino De La Reina and Camino Del Rio South. Class II bicycle lanes are generally present, except south of Camino De La Reina, where an unsigned paved shoulder is intermittently present. MTS Route 6 runs along Qualcomm Way between Camino De La Reina and the roadway's southern terminus at Camino Del Rio South, where the roadway changes its name to Texas Street. In addition, MTS Route 18 runs along the roadway between Camino Del Rio North and Camino Del Rio South.

- **Texas Street** is a four-lane roadway between Camino Del Rio South and approximately 1,400 feet north of Madison Avenue, where the roadway narrows to three lanes. Between that point and Madison Avenue, there are two southbound and one northbound lanes. Between Madison Avenue and Meade Avenue, Texas Street narrows to a two-lane roadway, before widening again to a three-lane roadway, with two southbound lanes and one northbound lane, between Meade Avenue and El Cajon Boulevard. Texas Street has a raised median between Camino Del Rio South and Madison Avenue, a center left-turn lane between Madison Avenue and Meade Avenue, and is an undivided roadway south of Meade Avenue. There are no posted speed limits along the roadway. There is no on-street parking permitted north of Madison Avenue. Sidewalks are generally present throughout the roadway, but are missing from the east side of the roadway between Camino Del Rio South and approximately 1,400 feet north of Madison Avenue. Class II bicycle facilities lanes are available between Madison Avenue. MTS Route 6 runs along Texas Street from the roadway's northern terminus at Camino Del Rio South to El Cajon Boulevard.
- **River Run Drive** is a two-lane undivided roadway with no posted speed limit. On-street parking is permitted. Sidewalks are present throughout the roadway, however, there are no bicycle facilities present.
- **Fenton Parkway** is a four-lane roadway. A raised median is present through all segments of Fenton Parkway. Speed limits are not posted along the roadway. On-street parking is not permitted, and sidewalks are present along the entire roadway. Class II bicycle facilities are generally present, except between the Portofino Apartments driveway and Friars Road.
- **Mission City Parkway** is a two-lane undivided roadway with a posted speed limit of 35 mph. On-street parking is not permitted. Sidewalks are present along the roadway, although they switch sides halfway through the roadway. There are no bicycle facilities. MTS Route 18 runs along the entirety of the roadway.
- **Northside Drive** is a four-lane roadway between the Portofino Apartments driveway and the Fenton Marketplace Driveway. South of the Fenton Marketplace Driveway, Northside Drive becomes a three-lane roadway, with two northbound lanes and one southbound lane. A raised median is present through all segments of Northside Drive. Speed limits are not posted along the roadway. On-street parking is permitted south of the Fenton Marketplace Driveway, as well as between Friars Road and the Fenton Marketplace Driveway, where a small segment of 15-minute parking exists. Sidewalks are present along the entire roadway. There are no bicycle facilities.

- **Mission Village Drive** is a four-lane roadway with a raised median between Ronda Avenue and the Friars Road westbound ramps. South of Friars Road, Mission Village Drive is an undivided roadway. There is a posted speed limit of 45 mph between Ronda Avenue and Friars Road. On-street parking is not permitted. Sidewalks are present along both sides of the roadway, and Class II bicycle facilities are present north of Friars Road.
- **Rancho Mission Road** is a three-lane road with one southbound lane, two northbound lanes, and a center left-turn lane between Friars Road and San Diego Mission Road. There is a posted speed limit of 35 mph between Friars Road and San Diego Mission Road. On-street parking is permitted on both sides of the roadway. Sidewalks are present between Friars Road and San Diego Mission Road. There are no bicycle facilities between San Diego Mission Road and Camino Del Rio North.
- **Ward Road** is a four-lane undivided roadway with no posted speed limit. On-street parking is permitted along both sides of the roadway. Sidewalks are present along both sides of the roadway. There are no bicycle facilities present. MTS Route 14 runs along Ward Road between Camino Del Rio North and the northern terminus of the roadway, where the roadway name changes to Rancho Mission Road.
- **Santo Road** is a two-lane roadway with a raised median and no posted speed limit. On-street parking is permitted along both sides of the roadway. Sidewalks are present along both sides of the roadway. There are no bicycle facilities present.
- **Riverdale Street** is a two-lane undivided roadway with no posted speed limit. On-street parking is permitted along both sides of the roadway. Sidewalks are present along both sides of the roadway. There are no bicycle facilities present.
- **Mission Gorge Road** is a four-lane roadway with a center left-turn lane and a posted speed limit of 30 mph. On-street parking is generally permitted along both sides of the roadway. Sidewalks are present along both sides of the roadway. There are no bicycle facilities present. MTS Route 13 runs along Mission Gorge Road between Zion Avenue and Mission Gorge Place in both directions, as well as between Mission Gorge Place and the roadway's southern terminus at Fairmount Avenue, in the northbound direction.
- **Fairmount Avenue** is a four-lane roadway with a raised median between the Camino Del Rio North/I-8 westbound off-ramp and the I-8 eastbound off-ramp. Between the I-8 eastbound off-ramp and Camino Del Rio South, Fairmount Avenue widens to a five-lane roadway with three southbound lanes and two northbound lanes and a raised median. Speed limits are not posted. On-street parking is not permitted. Sidewalks are present along the east side of the roadway only. Bicycle facilities are generally present, including Class II bike lanes between the I-8 westbound off-ramp and the I-8 eastbound off-ramp, and a Class I bike path south of the I-8 eastbound off-ramp along the east side of the roadway between the I-8 eastbound off-ramp and Camino Del Rio South. MTS Route 13 runs along the roadway in both directions from the southern community boundary to Camino Del Rio North, as well as in the northbound direction between Camino Del Rio North and Mission Gorge Road. Additionally, MTS Route 18 accesses Fairmount Avenue at Camino Del Rio South, running south to Montezuma Road, and north to the Grantville Trolley Station.

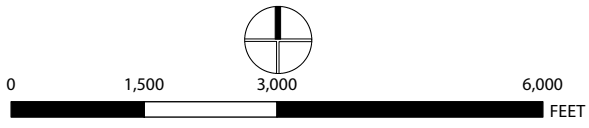
Figure 4.13-1: Existing Roadway Functional Classifications



- | | | | |
|----------------|--------------------------------|----------------|--|
| Trolley Stops | Roadway Classifications | 6-Ln Prime | 3-Ln Collector |
| Light Rail | 7-Ln Expressway | 6-Ln Major | 2-Ln Collector |
| Freeways | 6-Ln Expressway | 5-Ln Major | Fixed Median (on Collector roadways) |
| Ramps | 8-Ln Prime | 4-Ln Major | Two-Way Left Turn Lane (on Collector roadways) |
| Streams/Creeks | 7-Ln Prime | 4-Ln Collector | |

- Lakes/Ponds/Bays
- Mission Valley Community Plan Boundary
- Community Planning Areas

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Existing Freeways

Five freeways run adjacent to or traverse Mission Valley, carrying significant traffic volumes while providing regional mobility. A description of each freeway is provided, within the CPU area context, followed by an operational analysis of freeway segments.

- **I-5** is a north-south facility connecting San Diego County to the US-Mexico International Border to the south and Orange County to the north. The freeway is maintained and operated by the California Department of Transportation (Caltrans). I-5 has eight to nine mixed-flow/general purpose lanes (four northbound lanes, four to five southbound lanes) and two to three auxiliary lanes (one northbound lane, one to two southbound lanes) within the CPU area. Access within Mission Valley is provided by the I-8 interchange, however, I-5 is accessible just outside the community via Sea World Drive/Tecolote Road, Camino Del Rio West, and Old Town Avenue. In 2015, I-5 accommodated between 203,000 and 205,000 ADT between Sea World Drive/Tecolote Road and Old Town Avenue. Heavy vehicle traffic was estimated to account for 3.4 to 4.1 percent of total daily traffic.
- **SR-163** is a north-south facility running from I-15, north of SR-52, to Downtown San Diego. The freeway is maintained and operated by Caltrans. SR-163 varies from five to nine mixed-flow/general purpose lanes (three to five northbound lanes, two to four southbound lanes) and zero to three auxiliary lanes (zero to one northbound lanes, zero to two southbound lanes) within the CPU area. Access within the CPU area is provided at Friars Road and the I-8 interchange. Genesee Avenue and Washington Street provide access to SR-163 just outside of the community. In 2015, SR-163 accommodated between 130,000 and 179,000 ADT along segments adjacent to Mission Valley. Heavy vehicle traffic was estimated to account for 3.0 to 3.7 percent of total daily traffic.
- **I-805** is a north-south facility splitting from I-5 in Sorrento Valley and running parallel to I-5 to just north of the US-Mexico International Border, where the freeways merge back together. The freeway is maintained and operated by Caltrans. I-805 has nine to 10 mixed-flow/general purpose lanes (four to five northbound lanes, four to six southbound lanes) and zero to two auxiliary lanes (zero to one northbound lanes, zero to two southbound lanes) within the CPU area. I-805 is accessible via the I-8 interchange within the CPU area, and at Phyllis Place/Murray Ridge Road and Adams Avenue just outside of the CPU area. In 2015, I-805 carried between 185,000 and 205,000 ADT along segments adjacent to Mission Valley. Heavy vehicle traffic was estimated to account for 6.5 percent of total daily traffic.
- **I-15** is a north-south facility connecting San Diego County to Riverside County to the north and terminating in the Barrio Logan community, near I-5, to the south. South of I-8, I-15 becomes SR-15. The freeway is maintained and operated by Caltrans. The freeway is comprised of seven to nine mixed-flow/general purpose lanes (three to four northbound lanes, three to five southbound lanes) and zero to four auxiliary lanes (one to two northbound, zero to three southbound) within the CPU area. Access within Mission Valley is provided at Friars Road, the I-8 interchange, Camino Del Rio North, and Camino Del Rio South, with Aero Drive and Adams Avenue providing access just outside of the community. In 2015, I-15 accommodated between 166,000 and 212,000 ADT along

segments adjacent to Mission Valley. Heavy vehicle traffic was estimated to account for 2.2 to 5.0 percent of total daily traffic.

- **I-8** is an east-west facility connecting Mission Valley to I-5 and the coastal communities to the west and La Mesa, El Cajon and eventually Imperial County to the east. The freeway is maintained and operated by Caltrans. Adjacent to Mission Valley, I-8 varies from four to nine mixed-flow/general purpose lanes (two to five westbound lanes, two to five eastbound lanes) and zero to four auxiliary lanes (zero to two westbound lanes, zero to two eastbound lanes) adjacent to the community. Access within and adjacent to Mission Valley is provided at the I-5 interchange, Morena Boulevard, Taylor Street, Hotel Circle North (multiple access points), Hotel Circle South (multiple access points), SR-163 interchange, Mission Center Road, Camino Del Rio North, Qualcomm Way, I-805 interchange, Camino Del Rio South, and the I-15 interchange. In 2015, I-8 accommodated between 12,000 and 241,000 ADT along segments adjacent to Mission Valley. Heavy vehicle traffic was estimated to account for 1.0 to 3.5 percent of total daily traffic.

Existing Roadway Segment Conditions

To determine operations and potential impacts on the study area roadway segments, Table 4.13-1 has been developed by the City of San Diego and is used as a reference. The segment traffic volumes under Level of Service (LOS) E as shown in this table are considered at capacity because at LOS E the volume-to-capacity (v/c) ratio is equal to 1.0. The City of San Diego considers LOS D or better to be acceptable levels of service.

Based on planning-level analysis using ADT volumes, it is estimated that all roadway segments within the CPU area function at an acceptable LOS D or better, except for the following 26 segments. The segments listed below have volumes near or above their existing capacity, resulting in periods of congestion:

- Taylor Street, between Morena Boulevard and I-8 eastbound (EB) Ramps (LOS F)
- Taylor Street, between I-8 EB Ramps and Hotel Circle South (LOS E)
- Hotel Circle North, between Hotel Circle South and Hotel Circle Place (LOS F)
- Hotel Circle North, between I-8 westbound (WB) Ramps and Fashion Valley Road (LOS F)
- Camino De La Reina, between Avenida Del Rio and Camino De La Siesta (LOS F)
- Hotel Circle South, between Hotel Circle North and 1200 Feet East of Hotel Circle North (LOS F)
- Hotel Circle South, between I-8 EB Ramps and Bachman Place (LOS F)
- Hotel Circle South, between Bachman Place and Hotel Circle North (LOS F)
- Camino Del Rio South, between Western Terminus and 1800 Feet west of Mission Center Road (LOS E)
- Camino Del Rio South, between Mission Center Road and Texas Street (LOS E)
- Camino Del Rio South, between Texas Street and Mission City Parkway (LOS F)

- Morena Boulevard, between Tecolote Road and West Morena Boulevard (LOS F)
- Morena Boulevard, between Linda Vista Road and I-8 WB Off-Ramp (LOS F)
- Via Las Cumbres, between Linda Vista Road and Friars Road (LOS E)
- Bachman Place, between Hotel Circle South and Lewis Street (LOS E)
- Ulric Street, between Fashion Hills Boulevard and 600 Feet South of Fashion Hills Boulevard (LOS F)
- Ulric Street, between 600 Feet South of Fashion Hills Boulevard and Friars Road (LOS E)
- Mission Center Road, between Murray Ridge Road and 1200 Feet West of Murray Ridge Road (LOS F)
- Mission Center Road, between 1200 Feet West of Murray Ridge Road and 950 Feet North of Mission Valley Road (LOS E)
- Murray Ridge Road, between Mission Center Road and I-805 southbound (SB) Ramps (LOS F)
- Texas Street, between 1400 Feet North of Madison Ave and Madison Avenue (LOS F)
- Texas Street, between Madison Avenue and Meade Ave, (LOS F)
- Texas Street, between Meade Ave and El Cajon Boulevard (LOS F)
- Riverdale Street, between Friars Road and Vandever Avenue (LOS F)
- Fairmount Avenue, between Camino Del Rio North/I-8 WB Off-Ramp and I-8 EB Off-Ramp (LOS F)
- Fairmount Avenue, between I-8 EB Off-Ramp and Camino Del Rio South (LOS F)

Table 4.13-1: City of San Diego Roadway Segment Capacity (ADTs) and Level of Service

Roadway Functional Classification	Lanes	A	B	C	D	E
Expressway	6	30,000	42,000	60,000	70,000	80,000
Prime Arterial	8	35,000	50,000	70,000	75,000	80,000
Prime Arterial	6	25,000	35,000	50,000	55,000	60,000
Major Arterial	7	22,500	31,500	45,000	50,000	55,000
Major Arterial	6	20,000	28,000	40,000	45,000	50,000
Major Arterial	5	17,500	24,500	35,000	40,000	45,000
Major Arterial	4	15,000	21,000	30,000	35,000	40,000
Major Arterial	3	11,250	15,750	22,500	26,250	30,000
Major Arterial	2	7,500	10,500	15,000	17,500	20,000
Major Arterial (one-way)	3	12,500	16,500	22,500	25,000	27,500
Major Arterial (one-way)	2	10,000	13,000	17,500	20,000	22,500
Collector (w/ two-way LT lane)	4	10,000	14,000	20,000	25,000	30,000
Collector (w/ two-way LT lane)	3	7,500	10,500	15,000	18,750	22,500
Collector (w/ two-way LT lane)	2	5,000	7,000	10,000	13,000	15,000
Collector (w/o two-way LT lane)	4	5,000	7,000	10,000	13,000	15,000
Collector (w/o two-way LT lane)	3	4,000	5,000	7,500	10,000	11,000
Collector (w/o two-way LT lane)	2	2,500	3,500	5,000	6,500	8,000
Collector (w/o two-way LT lane) – no fronting property	2	4,000	5,500	7,500	9,000	10,000
Collector (one-way)	3	11,000	14,000	19,000	22,500	26,000
Collector (one-way)	2	7,500	9,500	12,500	15,500	17,500
Collector (one-way)	1	2,500	3,500	5,000	6,500	7,500
Sub-Collector (single-family)	2	-	-	2,200	-	-

Notes:

LT = Left-turn

The volumes and the average daily level of service listed above are only intended as a general planning guideline.

Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Capacities for any classification not identified in the sources noted below were developed based on interpolation from similar classifications.

Source: City of San Diego Traffic Impact Study Manual, 1998. Updated with input from City of San Diego Planning Department Mobility Staff (2017).

Existing Intersection Conditions

The TIS (Appendix D) includes a LOS analysis for the study intersections within the study area under existing conditions. LOS for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay. The LOS for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. The criteria for the various LOS designations for signalized and unsignalized intersections are given in Table 4.13-2.

Table 4.13-2: Level of Service Criteria for Intersections

LOS	Signalized (Control Delay) (sec/veh)	Unsignalized (Control Delay) (sec/veh)	Description
A	≤10.0	≤10.0	Operations with very low delay and most vehicles do not stop.
B	>10.1 and ≤20.0	>10.0 and ≤15.0	Operations with good progression but with some restricted movement.
C	>20.1 and ≤35.0	>15.1 and ≤25.0	Operations where a significant number of vehicles are stopping with some backup and light congestion
D	>35.1 and ≤55.0	>25.1 and ≤35.0	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles stopping increases.
E	>55.1 and ≤80.0	>35.1 and ≤50.0	Operations where there is significant delay, extensive queuing, and poor progression.
F	>80.1	>50.1	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

Note: Sec/veh = seconds per vehicle

Sources: 2010 Highway Capacity Manual, Chapter 18, Page 18-6, Exhibit 18-4; 2010 Highway Capacity Manual, Chapter 19, Page 19-2, Exhibit 19-1.

Within the City of San Diego, all signalized and unsignalized intersections are considered deficient if they operate at LOS E or F. All CPU study area intersections currently operate at LOS D or better during both peak periods, except for the following 13 intersections that operate at LOS E or F:

- #2: I-5 northbound (NB) Ramps and Sea World Drive/Tecolote Road – AM LOS E
- #5: Mission Center Road and Mission Valley Road/Civita Boulevard – PM LOS E
- #16: Frazee Road and Friars Road – PM LOS E
- #23: Northside Drive and Friars Road – PM LOS E

- #26: I-15 SB Ramps and Friars Road – PM LOS E
- #45: Fairmount Avenue/Camino Del Rio North and I-8 WB Off-Ramp – PM LOS E
- #47: I-8 WB Ramps/Handlery Hotel Driveway and Hotel Circle North (E) – AM/PM LOS E
- #55: Hotel Circle North and Taylor Street/Hotel Circle South – PM LOS E
- #56: I-8 EB Ramps and Hotel Circle South – PM LOS F
- #58: Mission Center Road and I-8 EB Ramps – PM LOS E
- #59: Mission Center Road and Camino Del Rio South – PM LOS F; Midday LOS E
- #61: Texas Street and Camino Del Rio South – AM/PM LOS E
- #67: Texas Street and Madison Avenue – AM LOS E

Existing Freeway Segment Conditions

Freeway LOS analysis is based upon procedures developed by Highway Capacity Manual 2010. The procedure for calculating freeway LOS involves estimating the vehicle speed (mi/h) (miles/hour) and density/flow (pc/mi/ln) (passenger car/mile/lane).

HCS 2010 software, developed by McTrans, was used to calculate both the vehicle speed and density/flow along the CPU area freeway segments. The HCS 2010 software required the following inputs to complete the speed and density/flow calculations:

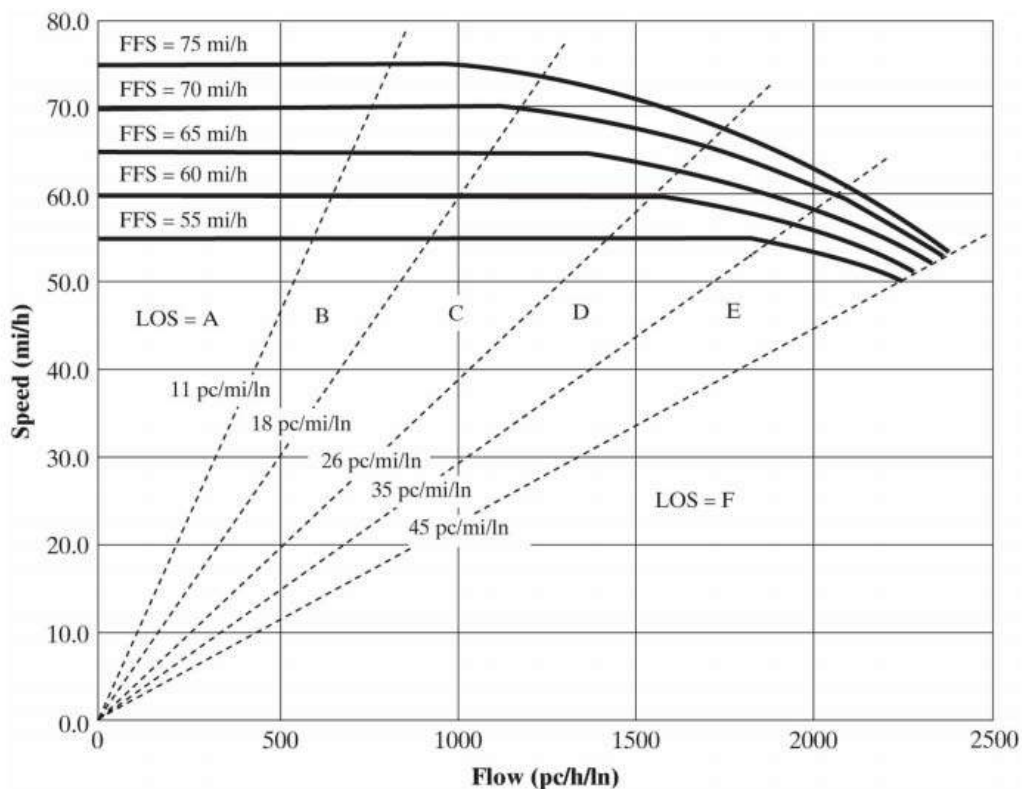
- Annual average daily traffic (AADT) – Caltrans Traffic Census 2015 AADT Volumes Report
- K (peak hour percentage) – Caltrans Traffic Census 2015 AADT Volumes Report
- D (directional split) – Caltrans Traffic Census 2015 AADT Volumes Report
- $AADT_{adj}$ – Calculated using AADT and D values provided by Caltrans using the following equation:
$$AADT_{adj} = \left(\frac{D}{1-D}\right)AADT$$

Represents the direction in the opposite direction of the Peak Direction
- Peak hour factor (PHF) – Assumed to be a typical value of 0.95
- P_T (percent Trucks and Buses) – Caltrans Traffic Census 2015 AADT Truck Volumes Report
- P_R (percent RVs) – Assumed to be 0, HCM 2010 recommends grouping RV volumes with Trucks in Buses as the value is assumed less than a 5:1 ratio
- General Terrain – Assumed to be less than 2 percent grade and therefore Level Terrain (HCM 2010 11-16,17)
- f_p – Driver population factor assumed one as traffic is largely commuter traffic
- E_T – Value of 1.5 as terrain is Level (HCM 2010 11-15)

- E_R – Value of 1.2 as terrain is Level (HCM 2010 11-15)
- Lane Width – Assumed 12' maximum value by Google Earth survey
- Right-Side Lateral Clearance – Assumed 6' maximum value by Google Earth survey
- Total Ramp Density (TRD) – Found in the Caltrans Traffic Census 2015 AADT Ramp Volumes Report
- Density calculated by total number of on/off ramps in single direction within segment length plus 3 miles in both directions, divided by the total length
- Base free-flow Speed (BFFS) – Assumed 75.4 mph (HCM 2010 11-11)

Using the calculated freeway speed and density/flow, the LOS is determined using the chart in Figure 4.13-2.

Figure 4.13-2: Freeway/State Highway Level of Service Standards and Thresholds



Source: Highway Capacity Manual. 2010.

Freeway volumes were obtained from Caltrans (2015). The following 27 directional freeway segments surrounding the Mission Valley CPU area have volumes that exceed the capacity during the AM and/or PM peak hour:

- EB I-8, I-5 Interchange to Morena Boulevard (PM LOS E)
- EB I-8, Morena Boulevard to Taylor Street (PM LOS F)
- EB I-8, Taylor Street to Hotel Circle (PM LOS E)
- EB I-8, SR-163 Interchange to Mission Center Road (PM LOS F)
- WB I-8, SR-163 Interchange to Mission Center Road (AM LOS E)
- EB I-8, Mission Center Road to Qualcomm Way / Texas Street (PM LOS F)
- WB I-8, Mission Center Road to Qualcomm Way / Texas Street (AM LOS F)
- EB I-8, Qualcomm Way / Texas Street to I-805 Interchange (PM LOS F)
- WB I-8, Qualcomm Way / Texas Street to I-805 Interchange (AM LOS E)
- EB I-8, I-805 Interchange to I-15 Interchange (PM LOS E)
- EB I-8, I-15 Interchange to Fairmount Avenue (PM LOS F)
- SB I-5, Sea World Drive / Tecolote Road to I-8 Interchange (AM LOS F)
- NB I-5, I-8 Interchange to Old Town Avenue (AM LOS E)
- SB I-5, I-8 Interchange to Old Town Avenue (AM LOS F)
- SB SR-163, Genesee Avenue to Friars Road (PM LOS E)
- NB SR-163, Friars Road to I-8 Interchange (PM LOS E)
- NB SR-163, I-8 Interchange to 6th Avenue (PM LOS E)
- SB SR-163, 6th Avenue to Washington Street (AM & PM LOS F)
- NB I-805, Mesa College Drive / Kearny Villa Road to Murray Ridge Road / Phyllis Place (AM LOS F)
- SB I-805, Mesa College Drive / Kearny Villa Road to Murray Ridge Road / Phyllis Place (PM LOS F)
- SB I-805, Murray Ridge Road / Phyllis Place to I-8 Interchange (PM LOS F)
- NB I-805, I-8 Interchange to Adams Avenue (AM LOS F)
- SB I-805, I-8 Interchange to Adams Avenue (PM LOS E)
- NB I-805, Adams Avenue to El Cajon Boulevard (AM LOS E)
- SB I-805, Adams Avenue to El Cajon Boulevard (PM LOS F)
- NB I-15, Aero Drive to Friars Road (AM LOS F)
- SB I-15, Aero Drive to Friars Road (PM LOS E)

Existing Freeway Ramp Metering Conditions

Ramp volumes were obtained from intersection turning movements data, ramp metering rates were obtained from Caltrans (2015). The following freeway ramps are currently metered under the existing conditions:

- I-5 NB On-ramp at Sea World Drive – AM & PM peak hours
- I-5 SB On-ramp at Sea World Drive – AM & PM peak hours
- I-805 NB On-ramp at Murray Ridge Road – AM peak hour
- I-805 SB On-ramp at Phyllis Place – PM peak hour
- I-15 NB On-ramp at Friars Road – AM & PM peak hours
- I-15 SB On-ramp at Friars Road (EB approach) – PM peak hour
- I-15 SB On-ramp at Friars Road (WB approach) – PM peak hour
- I-8 EB On-ramp at Texas Street (NB approach) – PM peak hour
- I-8 EB On-ramp at Texas Street (SB approach) – PM peak hour
- I-8 EB On-ramp at Fairmount Avenue (NB approach) – PM peak hour
- I-8 EB On-ramp at Fairmount Avenue (SB approach) – PM peak hour

Ramp metering analyses are provided in the TIS; none of the ramp meters within the study area experience delays in excess of 15 minutes.

Existing Alternative Transportation Facilities

Existing Transit

The CPU area is currently served by nine bus routes, including routes 6, 14, 18, 20, 25, 41, 88, 120, and 920. Additional bus routes pass through the community and do not have stops within Mission Valley, but are adjacent to and accessible from Mission Valley including routes 13, 44, and 105. Mission Valley is also served by the San Diego Trolley (LRT) Green Line, with seven stations within the CPU area located at Mission San Diego, San Diego County Credit Union (SDCCU) Stadium, Fenton Parkway, Rio Vista, Mission Valley Center, Hazard Center, and Fashion Valley. Also, the Old Town Transit Center is located just outside the community and provides additional access to LRT, bus transit, and passenger rail service. The San Diego Trolley connects the Mission Valley community to Downtown, Old Town, University of California San Diego (UCSD), University Town Center (UTC), San Diego State University, El Cajon, Santee, National City, Chula Vista, and San Ysidro.

Existing Bicycle Facilities

The existing bicycle network within the Mission Valley community comprises Class I (Bicycle Path), Class II (Bicycle Lane), Class III (Bicycle Route), and Class IV (Cycle Track) facilities. The network is extensive throughout the community, providing for both inter- and intra-community travel with minor fragmenting. Class I facilities are provided along portions of the San Diego River

and parallel to I-15. Class II facilities run along Friars Road, Civita Boulevard/Mission Valley Road, Rio San Diego Drive, San Diego Mission Road, Hotel Circle North and South, Camino Del Rio North and South, Pacific Highway, Mission Center Road, Russel Park Way, Camino Del Este, Qualcomm Way, Fenton Parkway, and Mission Village Drive. Class III connections are provided along Hotel Circle South, Camino De La Reina, Camino Del Rio North, Friars Road, and Fashion Valley Road. A two-way Cycle Track is provided along the south side of Friars Road, from the western community boundary to just west of Fashion Valley Road. Figure 4.13-3 shows the existing and planned bicycle network for the CPU area.

Large blocks/parcels, high vehicular speeds and traffic volumes, as well as limited north-south connections can make bicycling in Mission Valley challenging. Barriers to bicycle travel are natural and manmade. The San Diego River and steep topography shaping the community's valley location limit connections for all modes across the CPU area and to neighboring communities. Similarly, I-8 spans the length of Mission Valley, limiting bicycle mobility while the SR-163 and I-15 freeway ramps create additional conflict points.

Existing Pedestrian Environment

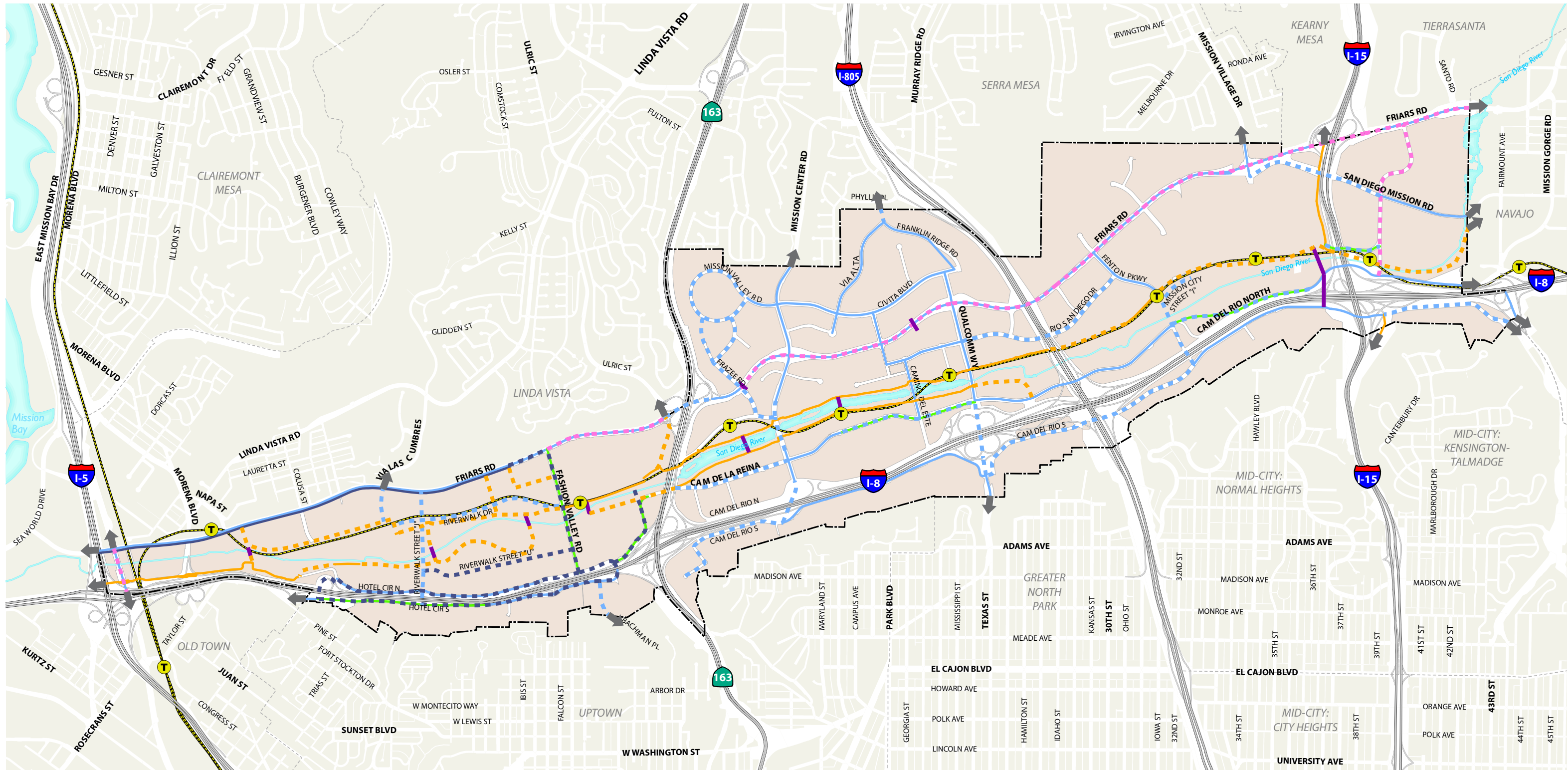
The existing built environment in Mission Valley caters to the automobile. Super blocks, large surface parking lots, high vehicular volume local roadways and multiple regional freeway facilities all contribute to a challenging pedestrian environment. The San Diego River and I-8 act as additional barriers to pedestrian travel within the community, greatly limiting opportunities for north-south mobility.

Issues with the CPU area's pedestrian network include locations with high pedestrian collisions, sidewalk connectivity issues, high existing pedestrian activity, and high pedestrian priority as identified by the updated City of San Diego Pedestrian Priority Model. The central portion of Mission Valley, between SR-163 and I-805, exhibits the greatest concentration of pedestrian collisions within the community. In particular, there are four intersections where two or more pedestrian collisions were reported during the five-year study period (2008-2013), including:

- Friars Road and Frazee Road
- Hazard Center Drive and Frazee Road
- Rio San Diego Drive and Qualcomm Way
- Camino Del Rio South and Qualcomm Way

There are many roadways with missing sidewalks in Mission Valley, including major segments of Friars Road, Hotel Circle North and South, and Camino Del Rio North and South. Some of these streets are served by bus routes, with sidewalk gaps inhibiting transit access.

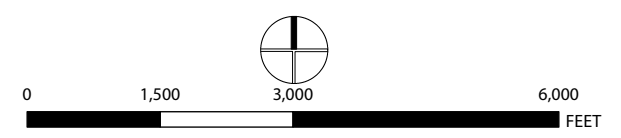
Figure 4.13-3: Existing and Planned Bicycle Network



Trolley Stops	Existing Bicycle Facilities	Class IV - Two Way Cycle Track	Proposed Bicycle Facilities	Class IV - One-Way Cycle Track	Lakes/Ponds/Bays
Light Rail	Class I - Bike Path	Pedestrian / Bicycle Bridge	Class I - Bike Path	Class IV - Two-Way Cycle Track	Mission Valley Community Plan Boundary
Freeways	Class II - Bike Lane		Class II - Bike Lane	Pedestrian / Bicycle Bridge	Community Planning Areas
Ramps	Class III - Bike Route		Class III - Bike Route	Bicycle Facility in Adjacent Community	
Streams/Creeks					

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4.13.1.2 REGULATORY SETTING

State Regulations

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately-owned railroad and rail transit. CPUC staff ensures that highway-rail and pathway-rail crossings are safely designed, constructed, and maintained. The Rail Crossings and Engineering Branch engineers investigate and evaluate requests to construct new rail crossings or modify existing crossings.

California Department of Transportation

Caltrans is the primary State agency responsible for transportation issues. One of its duties is the construction and maintenance of the State highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

California Transportation Commission

The California Transportation Commission (CTC) consists of nine members appointed by the Governor. CTC is responsible for the programming and allocating of funds for the construction of highway, passenger rail, and transit improvements throughout the state. CTC is responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

California Complete Streets Act of 2008

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (Assembly Bill [AB] 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multi-modal perspective, including public transit and walking and biking, which have traditionally been marginalized in comparison to automobiles in contemporary American urban planning.

Local Regulations

San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the regional authority that creates region-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's Regional Plan (RP) combines two of the region's existing planning documents: the Regional Comprehensive Plan for the San Diego Region (RCP) and the Regional

Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the RP.

SANDAG Regional Bike Plan

The Riding to 2050, San Diego Regional Bike Plan adopted by SANDAG supports implementation of the RP. It provides a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce greenhouse gas (GHG) emissions and improve mobility. Goals of the Regional Bike Plan include increasing levels of bicycling; improving bicycling safety; encouraging Complete Streets; supporting reductions in emissions; and increasing community support. In September 2013, the SANDAG Board of Directors approved funding to implement the Regional Bike Plan Early Action Program, which focuses on the region's highest-priority projects. Priority is chosen in part based on proximity to smart growth areas, taking into account that bikeways would be used more often if they connect high-density activity hubs within a short distance of each other, and on whether a project would fill key gaps in the regional bike networks.

City of San Diego General Plan

The Mobility Element of the General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems (ITS), transportation demand management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

City of San Diego Bicycle Master Plan

The City's Bicycle Master Plan Update (City of San Diego, 2013) provides a framework for making cycling a more practical and convenient transportation option for a wider variety of San Diegans with varying riding purposes and skill-levels. The plan update evaluates and builds on the 2002 Bicycle Master Plan so that it reflects changes in bicycle user needs and changes to the City's bicycle network and overall infrastructure.

4.13.2 Impact Analysis

4.13.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to Transportation are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the project. A significant impact could occur if implementation of the project would:

- 1) Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps; or
- 2) Conflict with adopted policies, plans, or programs supporting alternative transportation.

4.13.2.2 METHODOLOGY

The City of San Diego and Caltrans have developed acceptable threshold standards to determine the significance of project impacts to roadway segments, intersections, freeway segments, and freeway ramp metering. Along roadway segments and freeway segments, the measurement of effectiveness (MOE) is based on allowable increases in the v/c ratio. At intersections, the MOE is based on allowable increases in delay. At a freeway ramp meter, the MOE is based on allowable increases in delay, measured in minutes. These thresholds, applicable to the analysis of transportation facilities (Impact 1) are summarized in Table 4.13-3 and further detailed below. In addition to these thresholds, if the project causes any facility to degrade from LOS D or better to LOS E or F, this would be considered a significant impact.

Roadway Segments

For roadway segments forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.02 at LOS E and 0.01 at LOS F. If vehicle trips from the proposed CPU would cause the v/c ratio to increase by more than the allowable threshold, this would be considered a significant impact. Also, if the proposed CPU would cause a street segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

Signalized and Unsignalized Intersections

LOS F is not acceptable for any approach leg except for side streets on an interconnected arterial system. If vehicle trips from the proposed CPU would cause an intersection approach leg to operate at LOS F, except in the cases of side streets on an interconnected arterial system, this would be considered a significant impact. At intersections that are expected to operate at LOS E or F without the proposed CPU, the allowable increase in delay is two seconds at LOS E and one second at LOS F with the addition of the proposed CPU. If vehicle trips from the proposed CPU would cause the delay at an intersection to increase by more than the allowable threshold, this would be considered

a significant impact. Also, if the proposed CPU would cause an intersection that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant project impact.

Table 4.13-3: Significance Criteria for Facilities in Study Area

<i>Facility</i>	<i>Measures of Effectiveness (MOE)</i>	<i>Significance Threshold¹</i>
Roadway Segment	ADT, v/c ratio	> 0.02 at LOS E or > 0.01 at LOS F
Intersection	Seconds of Delay	> 2.0 seconds at LOS E or > 1.0 second at LOS F
Freeway Segment	Speed	Decrease in speed of 1.0 mph for freeway segments operating at LOS E, and decrease in speed of 0.5 mph for freeway segments operating at LOS F
Freeway Ramp Meter	Minutes of delay per vehicle	> 2.0 minutes for freeway segments operating at LOS E, and >1.0 minutes for freeway segments operating at LOS F. The criteria only apply for ramp meters where the delay without project is 15 minutes or higher.

Notes:

ADT = average daily traffic

v/c = volume to capacity

LOS = Level of Service

1. Applies only when the facility operates at LOS E or F

Source: City of San Diego Significance Determination Thresholds 2016; City of San Diego Development Services Department 2007.

Freeway Segments

For freeway segments forecasted to operate at LOS E or F with the proposed CPU, the allowable decrease in average travel speed is 1.0 mph at LOS E and 0.5 mph at LOS F. If vehicle trips from the proposed CPU would cause the average travel speed to decrease more than the allowable threshold, this would be considered a significant impact. Also, if the proposed CPU would cause a freeway segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

Freeway Ramp Metering

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the traffic operations and flow on the freeway main lanes. Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The excess demand, if any, forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate. This approach assumes a static meter rate throughout the course of the peak hour. However, Caltrans has indicated that the meter rates are continually adjusted based on the level of traffic using the on-ramp. To the extent possible, the

meter rate is set such that the queue length does not exceed the available storage, smooth flow on the freeway mainline is maintained, and there is no interference to arterial traffic.

If the proposed CPU would cause a metered ramp to experience 15 minutes per vehicle or higher delay and the proposed CPU increases its delay by more than 2 minutes per vehicle if the downstream freeway segment operates at LOS E, or more than 1 minute per vehicle if the downstream freeway segment operates at LOS F, this would be considered a significant impact.

4.13.2.3 IMPACTS

Impact 4.13-1: Traffic Circulation

Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?

To assess potential impacts, this section provides a description of Future (Year 2050) community conditions for the study area. The analysis considers the existing conditions within the study area and evaluates impacts to applicable facilities within the study area through 2050. Since the analysis is looking at impacts over the long-term, projected traffic volume increases over existing conditions associated with regional growth are included within the analysis. The proposed CPU was developed to be largely self-mitigating from a transportation impact standpoint. The proposed CPU allows for increased density in transit priority areas and a complementary mix of land uses which puts origins and destinations closer together and links them with a complete active transportation network, thus reducing the distances travelled and the need to travel by car.

Proposed CPU Roadway Network

The proposed CPU roadway network is shown in Figure 4.13-4 and includes the following modifications to the existing roadway network.

Proposed Roadway Modifications

- **Fashion Valley Road, from Friars Road to Hotel Circle North.** Widen the roadway to the west as redevelopment occurs from a 4-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane Major Arterial. The roadway widening would also be used to accommodate a Class IV Cycle Track (two-way) along the west side of the roadway.
- **Bachman Place, from Hotel Circle South to the Southern Community Boundary.** Widen this roadway to improve from a 2-Lane Collector to a 4-Lane Collector with Two-Way Left-Turn Lane. Left-turn pockets may be provided at intersection and driveway locations in lieu of a continuous two-way left-turn lane. The widening would also provide for Class II Bike Lanes.
- **Hotel Circle North and Hotel Circle South.** The full length of these two roadways will be transformed from 2-Lane Collector (with two-way left-turn lane), or 2-Lane Collector with no fronting property, or 3-Lane Collector roadways into a one-way couplet with two lanes, running in a counterclockwise direction. The roadways would be classified as 2-Lane

Collector (One-Way). The planned Class IV Cycle Track (two-way) would be accommodated through restriping within the existing roadway width along the land use side of each roadway.

- **Friars Road, from Ulric Street/SR-163 SB Ramps to Mission Center Road.** Consistent with the SR-163 Interchange Project, improve this section from a 5-/6-Lane Major Arterial to an 8-Lane Prime Arterial, which would require limiting future driveway access. The existing Class II Bike Lanes would be maintained from Ulric Street/SR-163 SB Ramps to Frazee Road. The planned Class IV Cycle Tracks (one-way) would be accommodated between Frazee Road and Mission Center Road through lane restriping.
- **Rio San Diego Drive, from River Run Drive to Fenton Parkway.** This segment would be restriped from a 4-Lane Collector to a 2-Lane Collector while maintaining the left-turn pockets. The additional right-of-way would be restriped to accommodate the planned Class II Bike Lanes with buffers between the vehicular travel lane and parking lane. On-street parking would be retained.
- **Camino Del Rio North, from Mission City Parkway to Ward Road.** This segment would be reconstructed to better align with Camino Del Rio North west of Mission City Parkway. The roadway would be classified as a 2-Lane Collector without Two-Way Left-Turn Lane. Class II Bike Lanes would be accommodated/maintained along this segment.
- **Camino Del Rio North, from ~~1000' West of Fairmount Avenue~~ Ward Road to the Eastern Community Boundary.** Reclassify this segment from a 4-Lane Major Arterial to a 4-Lane Collector with Two-Way Left-Turn Lane. No infrastructure changes would be required.
- **San Diego Mission Road, from Mission Village Drive to Rancho Mission Road.** Widen the roadway with redevelopment to improve this segment from a 4-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane with Two-Way Left-Turn Lane and Class II Bike Lanes. Left-turn pockets may be provided at intersection and driveway locations in lieu of a continuous two-way left-turn lane.
- **San Diego Mission Road, between Rancho Mission Road and Fairmount Avenue.** Widen and restripe this section from a 2-Lane Collector to a 4-Lane Collector with Two-Way Left-Turn lane. Left-turn pockets may be provided at intersection and driveway locations in lieu of a continuous two-way left-turn lane. The existing Class II Bike Lanes would be retained.
- **Camino Del Rio South, between the western terminus and Mission City Parkway.** Restripe this section of Camino Del Rio South from a 2-Lane Collector and 2-Lane Collector with Two-Way Left-Turn Lane to accommodate bicycle lanes. Left-turn pockets may be provided at driveway locations as needed in lieu of a continuous two-way left-turn lane. On-street parking would be removed in some locations to facilitate implementation of the two-way left-turn lane or left-turn pockets, and Class II Bike Lanes.
- **Metropolitan Drive, from Mission Valley Road to Frazee Road.** Restripe this roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 2-Lane Collector without Two-Way Left-Turn Lane to accommodate Class II Bike Lanes. On-street parking would be retained.

- **Mission Valley Road, from Frazee Road to Metropolitan Drive (clockwise).** Restripe this roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 2-Lane Collector without Two-Way Left-Turn Lane to accommodate Class II Bike Lanes. On-street parking would be retained.
- **Murray Canyon Road, from Frazee Road to Metropolitan Drive.** Restripe this roadway from a 3-Lane Collector with Two-Way Left-Turn Lane to a 2-Lane Collector without Two-Way Left-Turn Lane to accommodate buffered Class II Bike Lanes. On-street parking would be retained.
- **Rancho Mission Road/Ward Road, between Friars Road and Camino Del Rio North.** The full extent of this roadway will be restriped to a 2-Lane Collector with Two-Way Left-Turn Lane to provide for Class IV Cycle Tracks (one-way) in each direction. Left-turn pockets may be provided at intersection and driveway locations in lieu of a continuous two-way left-turn lane. On-street parking would be largely maintained.

Proposed Roadway Extensions and New Roadways

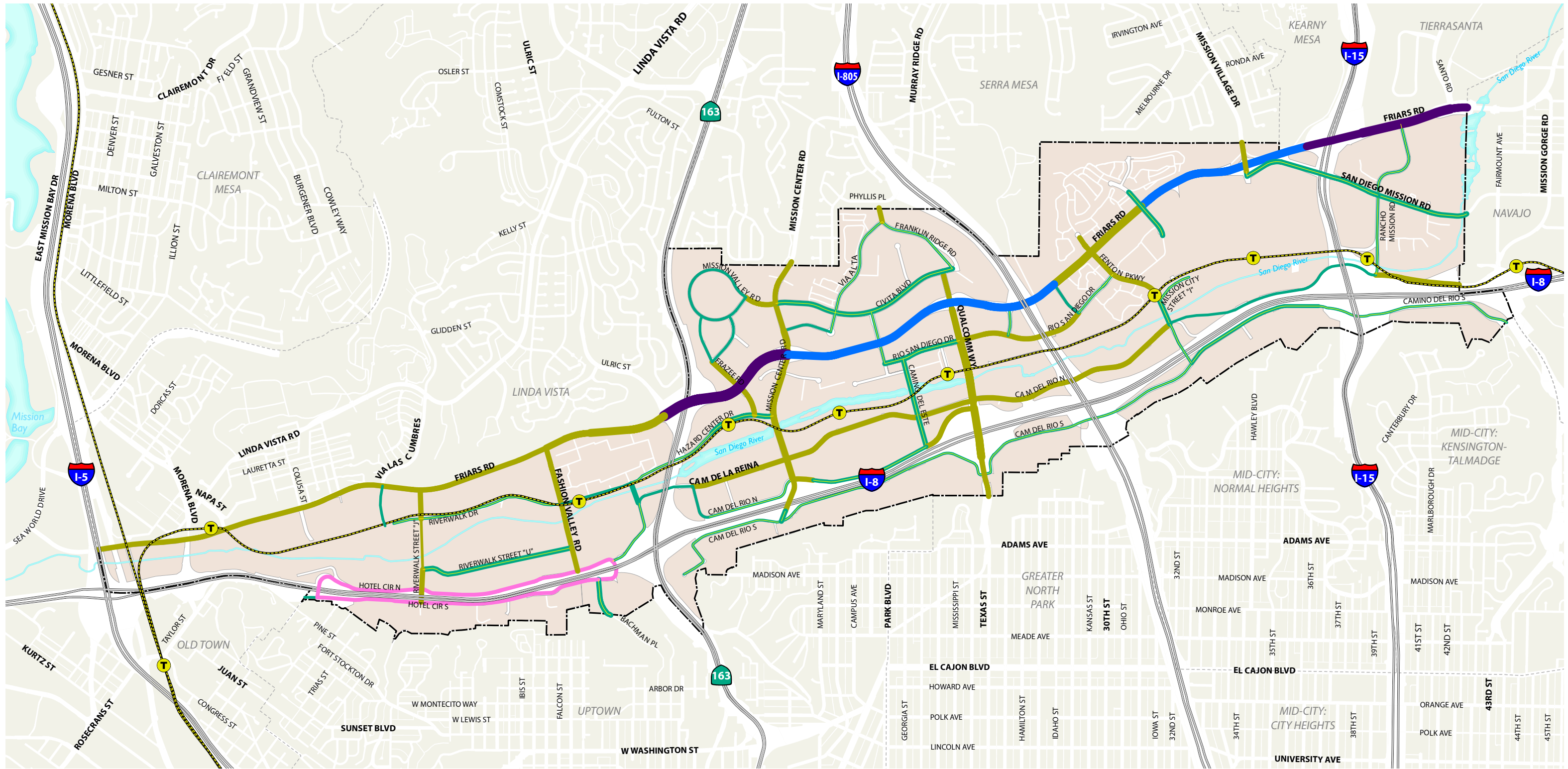
To provide better connectivity throughout the Mission Valley community and provide additional access to potential new developments within the existing “super blocks,” the Proposed CPU ~~proposes~~ includes the following roadway extensions and new roadways:

- **Via Las Cumbres.** Extend Via Las Cumbres south from the ~~southern terminus~~ Friars Road and terminate just north of the Trolley line. This extension would be constructed as a 2-Lane Collector.
- **~~New Riverwalk Street “J”.~~ Riverwalk Street “J”** would be a new road connecting Friars Road to Hotel Circle South. Riverwalk Street “J” would be constructed with ~~two~~ to four travel lanes, a painted median and Class II buffered bicycle lanes. Riverwalk Street “J” would provide for crossing under the MTS trolley tracks (in a manner similar to how Qualcomm Way and Mission Center Road cross under Friars Road), which would eliminate the need for an elevated roadway within the core of the Mission Valley community. Riverwalk Street “J” would also require a bridge over the San Diego River, constructed to allow for the 100-year flood event.
- **Frazee Road.** Extend Frazee Road northwards from Murray Canyon Road to Mission Valley Road/Metropolitan Drive. The extension would be constructed as a 2-Lane Collector without Two-Way Left-Turn Lane (No Fronting Property) and would accommodate the planned Class II Bike Lanes.
- **Franklin Ridge Road.** Extend Franklin Ridge Road north from Via Alta to Phyllis Place. This extension would be constructed as a 4-Lane Major Arterial.
- **Qualcomm Way.** Since completion of the Existing Conditions Report, Qualcomm Way, from Civita Boulevard to EB Friars Road on-/off-ramps has been constructed as a 4-Lane Major Arterial, including Class II Bike Lanes.
- **Fenton Parkway.** Extend Fenton Parkway south from the existing southern terminus to Camino Del Rio North as a 4-Lane Collector with turn lanes as needed, including grade separation and bridge over the San Diego River. Class II Bike Lanes would be provided along the Fenton Parkway extension.

- **Riverwalk Drive.** Extend Riverwalk Drive from Fashion Valley Road to western terminus west of the new Riverwalk Street “J”. This extension would be constructed as a 2-Lane Collector with Two-Way Left-Turn Lane, following the existing Riverwalk Drive alignment and continuing along the south side of the Trolley line. Class II Bike Lanes would be provided along the extension.
- ~~Levi Cushman Street “B.”~~ **Riverwalk Street “U.”** ~~Levi Cushman Street “B”~~ Riverwalk Street “U” would be an east-west running roadway, spanning from Fashion Valley Road in the east to the new Riverwalk Street “J” extension to the west. This roadway would be constructed as a 4-Lane Collector with Two-Way Left-Turn Lane. A Class IV Cycle Track (two-way) would be provided along the new roadway.
- **Hazard Center Drive.** Hazard Center Drive would be extended west from the western terminus to Avenida Del Rio. This extension would be constructed as a 2-Lane Collector with Two-Way Left-Turn Lane or left turn pockets as appropriate.
- ~~Mission City New Street “I.”~~ **New Mission City Street “I”** would be an east-west running roadway, from Fenton Parkway connecting to the future development on the Stadium site. This roadway would be constructed as a 2-Lane Collector with Two-Way Left-Turn Lane. Class II Bike Lanes would be provided along the new roadway.
- **Avenida Del Rio, between Fashion Valley Mall Parking Lot and Camino de La Reina.** This segment would be shifted westward to align with the north-south portion of Camino De La Reina and the Fashion Valley Mall Parking Lot Driveway and would maintain the 4-Lane Collector without Two-Way Left-Turn Lane classification. A Class IV Cycle Track (two-way) would be provided along the realigned roadway.

It should be noted that implementation of these new roadway segments may necessitate additional right-of-way and/or require the redevelopment of adjacent properties. All roadways would be designed in accordance with the City of San Diego Street Design Manual and their corresponding classification.

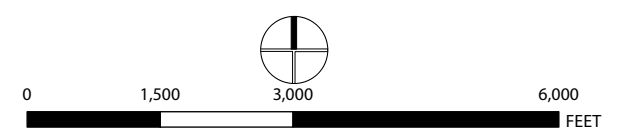
Figure 4.13-4: Proposed CPU Roadway Network



Trolley Stops	Roadway Classifications	6-Ln Major Arterial	3-Ln Collector	Lakes/Ponds/Bays
Light Rail	6-Ln Expressway	5-Ln Major Arterial	2-Ln Collector	Mission Valley Community Plan Boundary
Freeways	8-Ln Prime Arterial	4-Ln Major Arterial	Two-Way Left Turn Lane (on Collector roadways)	Community Planning Areas
Ramps	7-Ln Prime Arterial	2-Ln Major Arterial	2-Ln Collector (One-Way)	
Streams/Creeks	6-Ln Prime Arterial	4-Ln Collector		

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Future Traffic Volumes

The future community conditions were developed based on the project land use and network assumptions within the study area superimposed on the SANDAG 2050 Series 13 Traffic Forecast Model. Future traffic volumes utilized to identify potential traffic impacts associated with the Proposed CPU are provided in the TIS.

Roadway Segment Analysis

Based on the roadway segments LOS analysis results presented in the TIS, the project would have a significant cumulative impact on 27 roadway segments within the CPU area.² ~~Where impacts occur on consecutive segments of the same roadway, these impacts have been combined for clarity.~~

- Sea World Drive, between Mission Bay Parkway and Friars Road
- Friars Road, between Avenida De Las Tiendas and Ulric Street/SR-163 SB Ramps
- Three consecutive segments of Friars Road, between Mission Village Drive and Rancho Mission Road
- Friars Road, between Santo Road and Riverdale Street
- Rio San Diego Drive, between River Run Drive and Fenton Parkway
- Hotel Circle North, between I-8 WB Off-Ramp and Riverwalk Street “J”
- Camino De La Reina, between Avenida Del Rio and Camino De La Siesta
- Camino Del Rio North, between 1800’ West of Ward Road and Ward Road
- Two consecutive segments of Hotel Circle South, between I-8 EB Off-Ramp and I-8 EB On-Ramp
- Camino Del Rio South, between I-15 SB Off-Ramp and I-15 NB On-Ramp
- Morena Boulevard, between Tecolote Road and West Morena Boulevard
- Via Las Cumbres, between Linda Vista Road and Friars Road
- Avenida Del Rio, between Fashion Valley Parking Lot and Camino De La Reina
- Two consecutive segments of Ulric Street, between Fashion Hills boulevard and Friars Road
- Camino De La Siesta, between Camino De La Reina and Camino Del Rio North
- Metropolitan Drive, between Mission Valley Road and Murray Canyon Road
- Two consecutive segments of Mission Center Road, between Murray Ridge Road and Mission Valley Road
- Auto Circle, between Camino Del Rio North and I-8 EB Ramps

² The TIS identified 38 impacted roadway segments. The 27 impacted segments described here include those 38 segments, where adjacent segments of the same roadway have been collapsed into a single segment for clarity.

- Two consecutive segments on Murray Ridge Road, between Mission Center Road and I-805 SB Ramps
- Franklin Ridge Road, between Via Alta and Civita Boulevard
- Two consecutive segments of Qualcomm Way, between Camino Del Rio North and I-8 EB Ramps
- Three consecutive segments of Texas Street, between 1400' North of Madison Avenue and El Cajon Boulevard
- North Side Drive, between Fenton Market Place Driveway and Lowe's Frontage Road
- Two consecutive segments of Rancho Mission Road, between Friars Road and Camino Del Rio North
- Riverdale Street, between Friars Road and Vandever Avenue
- Two consecutive segments of Fairmount Avenue, between Camino Del Rio North and Camino Del Rio South
- Riverwalk Drive, between Fashion Valley Road and Avenida Del Rio

Mitigation measures MM-TR-1 through MM-TR-27 are provided below to address these potential significant impacts; however, none of the improvements identified in the measures were added to the proposed CPU because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU and General Plan goals as referenced in Table 1 of the proposed CPU Mobility Element, as well as Climate Action Plan (CAP) goals. Thus, the impacts are considered significant and unavoidable.

Intersection Analysis

Intersection delay and LOS are presented in the TIS. Future intersection improvements planned in the proposed CPU and assumed in this analysis are shown in Chapter 7.2 of the TIS. As shown in the TIS, the proposed CPU would have a significant cumulative impact at 14 study intersections. Out of the 14 impacts, 4 impacts occur at intersections located outside of the CPU area, but within the study area, as identified within the TIS.

- #3: I-805 SB Ramps / Phyllis Place in the PM peak hour
- #4: I-805 NB Ramps / Phyllis Place in the PM peak hour
- #11: Fashion Valley Road / Friars Road in the PM peak hour
- #24: Mission Village Drive / Friars Road WB Ramps in the PM peak hour
- #25: Mission Village Drive / Friars Road EB Ramps in the AM and PM peak hours
- #27: I-15 NB Ramps / Friars Road in the PM peak hour
- #40: Mission Center Road / Camino De La Reina in the PM peak hour
- #45: Fairmount Avenue / Camino Del Rio North/I-8 WB Off-Ramp in the PM peak hour

- #50: I-8 WB Ramps/Mission Valley Mall Driveway / Camino Del Rio North in the PM peak hour
- #52: Qualcomm Way / Camino Del Rio N/I-8 WB Ramps in the AM and PM peak hour
- #58: Mission Center Road / I-8 EB Ramps in the PM peak hour
- #61: Texas Street / Camino Del Rio South in the AM peak hour
- #67: Texas Street / Madison Avenue in the AM peak hour
- #74: Fashion Valley Road & Riverwalk Drive in the PM peak hour

Mitigation measures MM-TR-28 through MM-TR-41 are provided below to address these potential significant impacts; however, none of the improvements identified in the measures are included within the proposed CPU because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU and General Plan goals as referenced in Table 1 of the CPU Mobility Element, as well as the CAP. In some cases, additional study would be needed in conjunction with future Specific Plan proposals to determine specific appropriate improvements. MM-TR-63 and MM-TR-64 provide for this future review of Specific Plan proposals. Thus, the impacts are considered significant and unavoidable.

Freeway Segment Analysis

The average travel speed and LOS analysis results for the freeway segments within the study area are presented in the TIS. As shown in the TIS, the traffic generated by the land use changes associated with the project in addition to regional growth, would have a significant cumulative impact along 20 freeway segments within the study area.³ The following significant cumulative freeway segment impacts are identified:

- I-8 EB (AM & PM peak hours), between I-5 Interchange and Morena Boulevard
- I-8 EB (AM & PM peak hours), between Morena Boulevard and Taylor Street
- I-8 EB (PM peak hour) and I-8 WB (AM peak hour), between Taylor Street and Hotel Circle
- I-8 EB (PM peak hour), between Hotel Circle and SR-163 Interchange
- I-8 EB (AM & PM peak hours) and I-8 WB (AM peak hour), between Mission Center Road and Qualcomm Way / Texas Street
- I-8 EB (PM peak hour), and I-8 WB (AM peak hour), between I-805 Interchange and I-15 Interchange
- I-8 EB (PM peak hour), between I-15 Interchange and Fairmount Avenue
- I-5 NB (AM and PM peak hours), between I-8 Interchange to Old Town Avenue

³The TIS identified 31 impacted freeway segments. The 20 impacted segments described here include those 31 segments, where directional segments on the same freeway segment have been combined into a single segment for clarity.

- SR-163 NB (AM peak hour) and SR-163 SB (PM peak hour), between Genesee Avenue and Friars Road
- SR-163 NB (AM & PM peak hours), between Friars Road and I-8 Interchange
- SR-163 NB (AM & PM peak hours), between I-8 Interchange and 6th Avenue
- SR-163 NB (AM & PM peak hours) and SR-163 SB (AM & PM peak hours), between 6th Avenue and Washington Street
- I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Mesa College Drive / Kearny Villa Road and Murray Ridge Road / Phyllis Place
- I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Murray Ridge Road / Phyllis Place and I-8 Interchange
- I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between I-8 Interchange and Adams Avenue
- I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Adams Avenue and El Cajon Boulevard
- I-15 NB (AM peak hour) and I-15 SB (PM peak hour), between Aero Drive and Friars Road
- I-15 NB (AM & PM peak hours) and I-15 SB (AM & PM peak hours), between Friars Road and I-8
- I-15 NB (AM and PM peak hours), between I-8 and Adams Avenue
- I-15 NB (AM & PM peak hours), between Adams Avenue and El Cajon Boulevard

Mitigation measures MM-TR-42 through MM-TR-61 are provided below as potential mitigation measures to address these potential significant impacts; however, the improvements identified in these mitigation measures are not included in the proposed CPU for various reasons further detailed below. Therefore, these impacts are considered significant and unavoidable.

Freeway Ramp Metering Analysis

Ramp metering analysis results within the study area are presented in the TIS. As shown, the traffic generated by the land use changes associated with the project and regional growth would have a significant cumulative impact at one ramp meter within the study area:

- I-15 NB On-Ramp at Friars Road (AM and PM peak hours).

Mitigation Measure MM-TR-62 is provided below as a potential mitigation measure to address this potential significant impact; however, this measure would not fully mitigate the impact because it requires further coordination with Caltrans and study in conjunction with the development of the Stadium site under a Specific Plan that would identify direct and cumulative impacts and appropriate mitigation. Therefore, this impact is considered significant and unavoidable.

Mitigation Measures

The TIS identified improvements that would mitigate or reduce roadway segment and intersection impacts. While mitigation measures MM-TR-1 through MM-TR-41 would reduce potentially significant impacts to roadway segments and intersections if implemented, none of the measures are proposed to be included within the proposed CPU because they would require road widening or other automobile-related improvements that would preclude implementation of planned pedestrian and bicycle improvements as well as realization of the proposed CPU mobility vision and other proposed CPU and General Plan goals and policies regarding walkability and bicycling, which are consistent with the City of Villages strategy, and were therefore determined not to be appropriate for the roadway network. Implementation of these measures would also be inconsistent with Strategy 3 of the City's CAP. In some cases, additional study would be needed in conjunction with future Specific Plan proposals and in coordination with Caltrans, SANDAG, and MTS to determine appropriate specific improvements. MM-TR-63 and MM-TR-64 provide for this future review of Specific Plan proposals and coordination. Therefore, these impacts would remain significant and unavoidable.

Mitigation measures MM-TR-42 through MM-TR-62 are identified for impacts to freeways and on-ramps. The improvements identified in SANDAG's RP (2015) would improve operations along the freeway segments and ramps; however, there is insufficient information regarding the improvements and future developments' project-level impacts to allow the City to include such improvements within the proposed CPU to form the basis for a fair share mitigation fee for future development at this time. The RP does not clearly define or schedule freeway operational improvements and in some cases, a project study report is needed to identify specific improvements. Also, the RP does not include fully identified funding required to complete the improvements; therefore, the timing for implementation of these improvements is not known at this time. Given that the need for these improvements is due to regional cumulative impacts beyond those attributable solely to implementation of the proposed CPU, it is not possible to determine a fair share payment for the proposed CPU toward these improvements. Improvements to the I-15 onramp require further study in conjunction with the development of the Stadium site under a Specific Plan that would identify direct and cumulative impacts and appropriate mitigations. MM-TR-63 and MM-TR-64 provide for this future review of Specific Plan proposals and coordination with Caltrans, SANDAG, and MTS.

Advancements in technology such as smart cities, autonomous and connected vehicles and growth in disruptive trends such Mobility-as-a-Service (MaaS), transportation network companies (TNCs), and Micro-Mobility services have already and may continue to significantly affect transportation in the future. Policy and regulatory changes such as reducing parking requirements, have the potential to further affect impacts that may materialize over time. In addition, there is uncertainty regarding the timing of future development to allow the City to include such improvements in the proposed CPU to ultimately form the basis for a fair share mitigation fee at this time.

The proposed CPU was developed to be largely self-mitigating from a transportation impact standpoint. Regional transportation problems have increased due to sprawling development patterns and insufficient development within more location-efficient areas, such as Mission Valley, to meet regional demand for growth. The proposed CPU allows for increased density in transit

priority areas and a complementary mix of land uses which puts origins and destinations closer together and links them with a complete active-transportation network, thus reducing the distances travelled and the need to travel by car. In addition, the proposed CPU includes Implementing Actions that provide for continued coordination with regional partners such as SANDAG, Caltrans, and MTS to address regional transportation. The City would continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development proceeds, to potentially develop “fair share” mitigation strategies for freeway impacts, as appropriate. Therefore, these impacts would remain significant and unavoidable.

Roadway Segments

- MM-TR-1** **Sea World Drive, between Mission Bay Parkway and Friars Road.** Widening the roadway from a 4-Lane Major Arterial to a 6-Lane Major Arterial would improve the operations to LOS D.
- MM-TR-2** **Friars Road, between Avenida De Las Tiendas and Ulric Street/SR-163 SB Ramps.** Widening the roadway from a 6-Lane Major Arterial to an 8-Lane Prime Arterial would improve the operations to LOS C.
- MM-TR-3** **Friars Road, between Mission Village Drive and Rancho Mission Road.**
- Friars Road, Mission Village Drive to I-15 SB Ramps - Widening the roadway from a 6-Lane Expressway to an 8-Lane Expressway would improve the operations to LOS D.
 - Friars Road, I-15 SB Ramps to I-15 NB Ramps - Widening the roadway from a 6-Lane Prime Arterial to an 8-Lane Prime Arterial would improve the operations to LOS D.
 - Friars Road, I-15 NB Ramps to Rancho Mission Road - Widening the roadway from a 7-Lane Prime Arterial to an 8-Lane Prime Arterial would improve the operations to LOS D.
- MM-TR-4** **Friars Road, between Santo Road and Riverdale Street.** Widening the roadway from a 6-Lane Prime Arterial to an 8-Lane Prime Arterial would improve the operations to LOS C.
- MM-TR-5** **Rio San Diego Drive, between River Run Drive and Fenton Parkway.** Widening the roadway to maintain 4-Lane Collector with Two-Way Left-Turn Lane while providing the recommended Class II Bike Lanes would improve the operations to LOS B.
- MM-TR-6** **Hotel Circle North, between I-8 WB Off-Ramp and Riverwalk Street “J”.** Widening the roadway from a 2-lane Collector (one-way) to a 4-lane Collector (one-way) would improve the operations to LOS C.
- MM-TR-7** **Camino De La Reina, between Avenida Del Rio and Camino De La Siesta.** Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane

to a 2-Lane Collector with Two-Way Left-Turn Lane would improve the operations along this roadway segment. This roadway segment would continue to operate at LOS F, however this mitigation would improve the operation to pre-project conditions.

MM-TR-8 Camino Del Rio North, between 1800' West of Ward Road and Ward Road. Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane to a 2-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-9 Hotel Circle South, between I-8 EB Off-Ramp and I-8 EB On-Ramp.

- Hotel Circle South, I-8 EB Off-Ramp to Riverwalk Street “J” - Widening the roadway from a 2-lane Collector (one-way) to a 3-lane Collector (one-way) would improve the operation to LOS C.
- Hotel Circle South, Riverwalk Street “J” to I-8 EB On-Ramp - Widening the roadway from a 2-lane Collector (one-way) to a 4-lane Collector (one-way) would improve the operation to LOS D.

MM-TR-10 Camino Del Rio South, between I-15 SB Off-Ramp and I-15 NB On-Ramp. Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-11 Morena Boulevard, between Tecolote Road and West Morena Boulevard. Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-12 Via Las Cumbres, between Linda Vista Road and Friars Road. Widening the roadway from a 3-Lane Collector without Two-Way Left-Turn Lane to a 3-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-13 Avenida Del Rio, between Fashion Valley Parking Lot and Camino De La Reina. Widening the roadway from a 4-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-14 Ulric Street, between Fashion Hills boulevard and Friars Road.

- Ulric Street, Fashion Hills Boulevard to 600' South of Fashion Hills Blvd - Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS E (better than pre-project conditions).
- Ulric Street, 600' South of Fashion Hills Boulevard to Friars Road - Widening the roadway from a 3-Lane Collector with Two-Way Left-Turn Lane to a 4-

Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS E (better than pre-project conditions).

MM-TR-15 Camino De La Siesta, between Camino De La Reina and Camino Del Rio North. Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane to a 2-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-16 Metropolitan Drive, between Mission Valley Road and Murray Canyon Road. Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane (No Fronting Property) to a 2-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS D.

MM-TR-17 Mission Center Road, between Murray Ridge Road and Mission Valley Road.

- Mission Center Road, Murray Ridge Road to 1200' West of Murray Ridge Road - Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane Collector without Two-Way Left-Turn Lane would improve the operations to LOS E.
- Mission Center Road, 1200' W of Murray Ridge Rd to 950' N of Mission Valley Road - Widening the roadway from a 3-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-18 Auto Circle, between Camino Del Rio North and I-8 EB Ramps. Widening the roadway from a 4-Lane Major Arterial to a 6-Lane Major Arterial would improve the operations to LOS D.

MM-TR-19 Murray Ridge Road, between Mission Center Road and I-805 SB Ramps. Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS D.

MM-TR-20 Franklin Ridge Road, between Via Alta and Civita Boulevard. Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-21 Qualcomm Way, between Camino Del Rio North and I-8 EB Ramps.

- Qualcomm Way, Camino Del Rio North to I-8 WB Ramps - Widening the roadway from a 5-Lane Major to a 6-Lane Major would improve the operation to LOS E.
- Qualcomm Way, I-8 WB Ramps to I-8 EB Ramps - Widening the roadway from a 6-Lane Major to an 8-Lane Prime would improve the operation to LOS C.

MM-TR-22 Texas Street, between 1400' North of Madison Avenue and El Cajon Boulevard.

- Texas Street, 1400' North of Madison Ave to Madison Avenue - Widening the roadway from a 3-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations along this roadway segment. This roadway segment would continue to operate at LOS F, however this mitigation would improve operations to pre-project conditions.
- Texas Street, Madison Avenue to Meade Avenue - Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS D.
- Texas Street, Meade Ave to El Cajon Boulevard - Widening the roadway from a 2-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-23 North Side Drive, between Fenton Market Place Driveway and Lowe's Frontage Road. Widening the roadway from a 3-Lane Collector with Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-24 Rancho Mission Road, between Friars Road and Camino Del Rio North.

- Rancho Mission Road, Friars Road to San Diego Mission Road - Widening the roadway to provide a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.
- Rancho Mission Road, San Diego Mission Road to Camino Del Rio North - Widening the roadway to provide a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

MM-TR-25 Riverdale Street, between Friars Road and Vandever Avenue. Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane to a 4-Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS E.

MM-TR-26 Fairmount Avenue, between Camino Del Rio North and Camino Del Rio South.

- Fairmount Avenue, Camino Del Rio North/I-8 WB Off-Ramp to I-8 EB Off-Ramp - Widening the roadway from a 4-Lane Major Arterial to a 6-Lane Major Arterial would improve the operations along this roadway segment to LOS E.
- Fairmount Avenue, I-8 EB Off-Ramp to Camino Del Rio South - Widening the roadway from a 6-Lane Expressway to an 8-Lane Expressway would improve the operations along this roadway segment to LOS D.

MM-TR-27 Riverwalk Drive, between Fashion Valley Road and Avenida Del Rio. Widening the roadway from a 2-Lane Collector without Two-Way Left-Turn Lane to a 4-

Lane Collector with Two-Way Left-Turn Lane would improve the operations to LOS C.

Intersections

- MM-TR-28 3: I-805 SB Ramps / Phyllis Place in the PM peak hour.** Widen the southbound approach to add an additional southbound right-turn lane.
- MM-TR-29 4: I-805 NB Ramps / Phyllis Place in the PM peak hour.** Widen the northbound approach to add an additional northbound left-turn lane.
- MM-TR-30 11: Fashion Valley Road / Friars Road in the PM peak hour.** Widen the eastbound approach to add an additional eastbound through lane.
- MM-TR-31 24: Mission Village Drive / Friars Road WB Ramps in the PM peak hour.** Widen the westbound approach to add an additional westbound left-turn lane.
- MM-TR-32 25: Mission Village Drive / Friars Road EB Ramps in the AM and PM peak hours.** Restripe the southbound approach to add a third southbound through lane. Widen the northbound approach to add a second northbound right-turn lane.
- MM-TR-33 27: I-15 NB Ramps / Friars Road in the PM peak hour.** Widen the eastbound approach to add a second eastbound left-turn lane.
- MM-TR-34 40: Mission Center Road / Camino De La Reina in the PM peak hour.** Widen the northbound approach to add an exclusive right-turn lane, widen the westbound approach to add an exclusive right-turn lane, widen the eastbound approach to add an exclusive right-turn lane, and convert all right-turn lanes to overlap phasing.
- MM-TR-35 45: Fairmount Avenue / Camino Del Rio North/I-8 WB Off-Ramp in the PM peak hour.** Widen the southbound approach to add a third southbound through lane.
- MM-TR-36 50: I-8 WB Ramps/Mission Valley Mall Driveway / Camino Del Rio North in the PM peak hour.** Widen the westbound approach to construct an additional westbound left-turn lane. Including widening of the I-8 westbound On-ramp to construct an additional lane.
- MM-TR-37 52: Qualcomm Way / Camino Del Rio N/I-8 WB Ramps in the AM and PM peak hour.** Widen the southbound approach to construct an additional two (2) southbound through lanes, widen the northbound approach to construct an additional northbound through lane, widen the westbound approach to construct an additional westbound left-turn lane, and restripe the existing westbound left-through shared lane to a through lane.
- MM-TR-38 58: Mission Center Road / I-8 EB Ramps in the PM peak hour.** Widen the southbound approach to construct an addition southbound through lane.

- MM-TR-39** **61: Texas Street / Camino Del Rio South in the AM peak hour.** Widen the northbound approach to construct an additional northbound through lane.
- MM-TR-40** **67: Texas Street / Madison Avenue in the AM peak hour.** Widen the northbound approach to construct an additional northbound through lane.
- MM-TR-41** **74: Fashion Valley Road & Riverwalk Drive in the PM peak hour.** Widen the westbound approach to construct an additional westbound through lane.

Freeway Segments

- MM-TR-42** **I-8 EB (AM & PM peak hours), between I-5 Interchange and Morena Boulevard.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-43** **I-8 EB (AM & PM peak hours), between Morena Boulevard and Taylor Street.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-44** **I-8 EB (PM peak hour) and I-8 WB (AM peak hour), between Taylor Street and Hotel Circle.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-45** **I-8 EB (PM peak hour), between Hotel Circle and SR-163 Interchange.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-46** **I-8 EB (AM & PM peak hours) and I-8 WB (AM peak hour), between Mission Center Road and Qualcomm Way / Texas Street.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-47** **I-8 EB (PM peak hour), and I-8 WB (AM peak hour), between I-805 Interchange and I-15 Interchange.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.

- MM-TR-48 I-8 EB (PM peak hour), between I-15 Interchange and Fairmount Avenue.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-49 I-5 NB (AM and PM peak hours), between I-8 Interchange to Old Town Avenue.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.
- MM-TR-50 SR-163 NB (AM peak hour) and SR-163 SB (PM peak hour), between Genesee Avenue and Friars Road.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of further measures that would include additional lanes and transportation demand management (TDM) measures.
- MM-TR-51 SR-163 NB (AM & PM peak hours), between Friars Road and I-8 Interchange.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of further measures that would include additional lanes and transportation demand management (TDM) measures.
- MM-TR-52 SR-163 NB (AM & PM peak hours), between I-8 Interchange and 6th Avenue.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of further measures that would include additional lanes and transportation demand management (TDM) measures.
- MM-TR-53 SR-163 NB (AM & PM peak hours) and SR-163 SB (AM & PM peak hours), between 6th Avenue and Washington Street.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of

further measures that would include additional lanes and transportation demand management (TDM) measures.

- MM-TR-54 I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Mesa College Drive / Kearny Villa Road and Murray Ridge Road / Phyllis Place.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network ~~identifies~~ identifies four managed lanes will be added to this segment of I-805, two in each direction. This segment will consist of eight/ten freeway lanes and four managed lanes.~~operational improvements along this segment.~~ These improvements are anticipated to be completed by Year 2050.
- MM-TR-55 I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Murray Ridge Road / Phyllis Place and I-8 Interchange.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies four managed lanes will be added to this segment of I-805, two in each direction. This segment will consist of eight/ten freeway lanes and four managed lanes.~~operational improvements along this segment.~~ These improvements are anticipated to be completed by Year 2050.
- MM-TR-56 I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between I-8 Interchange and Adams Avenue.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies four managed lanes will be added to this segment of I-805, two in each direction. This segment will consist of eight/ten freeway lanes and four managed lanes.~~identifies operational improvements along this segment.~~ These improvements are anticipated to be completed by Year 2050.
- MM-TR-57 I-805 NB (AM peak hour) and I-805 SB (PM peak hour), between Adams Avenue and El Cajon Boulevard.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies four managed lanes will be added to this segment of I-805, two in each direction. This segment will consist of eight/ten freeway lanes and four managed lanes.~~identifies operational improvements along this segment.~~ These improvements are anticipated to be completed by Year 2050.
- MM-TR-58 I-15 NB (AM peak hour) and I-15 SB (PM peak hour), between Aero Drive and Friars Road.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network identifies two managed lanes will be added to this segment of I-15, one in each direction. This segment will consist of eight freeway lanes and two managed lanes. This improvement is anticipated to be implemented by 2035.~~operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.~~
- MM-TR-59 I-15 NB (AM & PM peak hours) and I-15 SB (AM & PM peak hours), between Friars Road and I-8.** SANDAG's 2050 San Diego Forward: The Regional Plan

(2015) Revenue Constrained Managed Lanes and Highway Network identifies two managed lanes will be added to this segment of I-15, one in each direction. This segment will consist of eight freeway lanes and two managed lanes. This improvement is anticipated to be implemented by 2035. operational improvements along this segment. These improvements are anticipated to be completed by Year 2050.

MM-TR-60 **I-15 NB (AM and PM peak hours), between I-8 and Adams Avenue.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of further measures that would include additional lanes and transportation demand management (TDM) measures.

MM-TR-61 **I-15 NB (AM & PM peak hours), between Adams Avenue and El Cajon Boulevard.** SANDAG's 2050 San Diego Forward: The Regional Plan (2015) Revenue Constrained Managed Lanes and Highway Network does not identify operational improvements along this segment. These improvements are anticipated to be completed by Year 2050. The City of San Diego shall coordinate with Caltrans to address freeway capacity at this impacted location. Coordination with Caltrans shall include consideration of further measures that would include additional lanes and transportation demand management (TDM) measures.

Ramp Meters

MM-TR-62: **I-15 NB On-Ramp at Friars Road (AM and PM peak hours).** The City of San Diego shall coordinate with Caltrans to address ramp capacity at this impacted location. The proposed CPU already includes a variety of planned transit, pedestrian, and bicycle facilities that would help to reduce single-occupancy vehicle (SOV) travel and reduce ramp demand. Coordination with Caltrans shall include consideration of further measures that would include additional lanes, interchange reconfigurations, and transportation demand management (TDM) measures. However, specific capacity improvements are still undetermined as these are future improvements that must be defined more over time and implementation of freeway improvements in a timely manner is beyond the full control of the City of San Diego.

All Transportation Facilities

MM-TR-63 Future specific plan proposals shall conduct transportation studies and include coordination between the City of San Diego, Caltrans, SANDAG and MTS to identify needed transportation improvements and transportation demand management measures.

- MM-TR-64** The City of San Diego shall continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level development proceeds, to potentially develop “fair share” mitigation strategies for freeway impacts, as appropriate.

Impact 4.13-2: Alternative Transportation

Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?

The proposed CPU would be consistent with adopted policies, plans, or programs supporting alternative transportation. Additionally, the project would provide policies that support improvements to pedestrian, bicycle, and transit facilities.⁴ Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans, or programs supporting alternative transportation as discussed below, and no mitigation is required.

Transit

Planned transit routes within the CPU area identified in SANDAG’s Regional Plan (2015) include Rapid Bus, LRT, and transit facilities as shown in Figure 4.13-5. The planned changes in existing transit operations to serve the Mission Valley community are as follows:

- **Local Bus Service.** Increase local bus service in key corridors (unidentified) to 10-minute headways. Implementation planned for 2035.
- **Purple Line (Phase I & II).** The initial Purple Line Trolley phase will extend from San Ysidro to Carmel Valley via Kearny Mesa and Chula Vista, National City, Southeast San Diego, Mid-City, and Mission Valley. Within Mission Valley, the alignment will run north-south, just west of I-15. The station within Mission Valley is planned to connect to the existing Green Line Trolley at the Stadium Station. Phase I implementation planned for 2035 (to Kearny Mesa), Phase II implementation planned for 2050 (to Carmel Valley).
- **Red Line.** The Red Line Trolley will run from Pacific Beach to the El Cajon Transit Center via Balboa Avenue and Kearny Mesa. Implementation planned for 2050.
- **Rapid Bus Route 28.** A new rapid bus route will run from Point Loma to Kearny Mesa via Old Town and Linda Vista. Implementation planned for 2035.
- **Rapid Bus Route 41.** A new rapid bus route will run from the Fashion Valley Transit Center to UTC/UCSD via Linda Vista and Clairemont. Implementation planned for 2035.
- **Rapid Bus Route 120.** A new rapid bus route will run from Kearny Mesa to Downtown via Mission Valley. Implementation planned for 2035.

⁴ See Policies for Development WLK-1 through WLK-5, BIC-1 through BIC-4, TRN-1, and TRN-2, and Implementing Actions IA-1 through IA-19.

- **Rapid Bus Route SR-163 Direct Access Ramps (DARs).** Kearny Mesa to Downtown via SR-163. Stations at Sharp/Children’s Hospital, University Avenue and Fashion Valley Transit Center. Implementation planned for 2035.
- **Green Line.** Green Line Trolley frequency enhancements are planned for 2050.

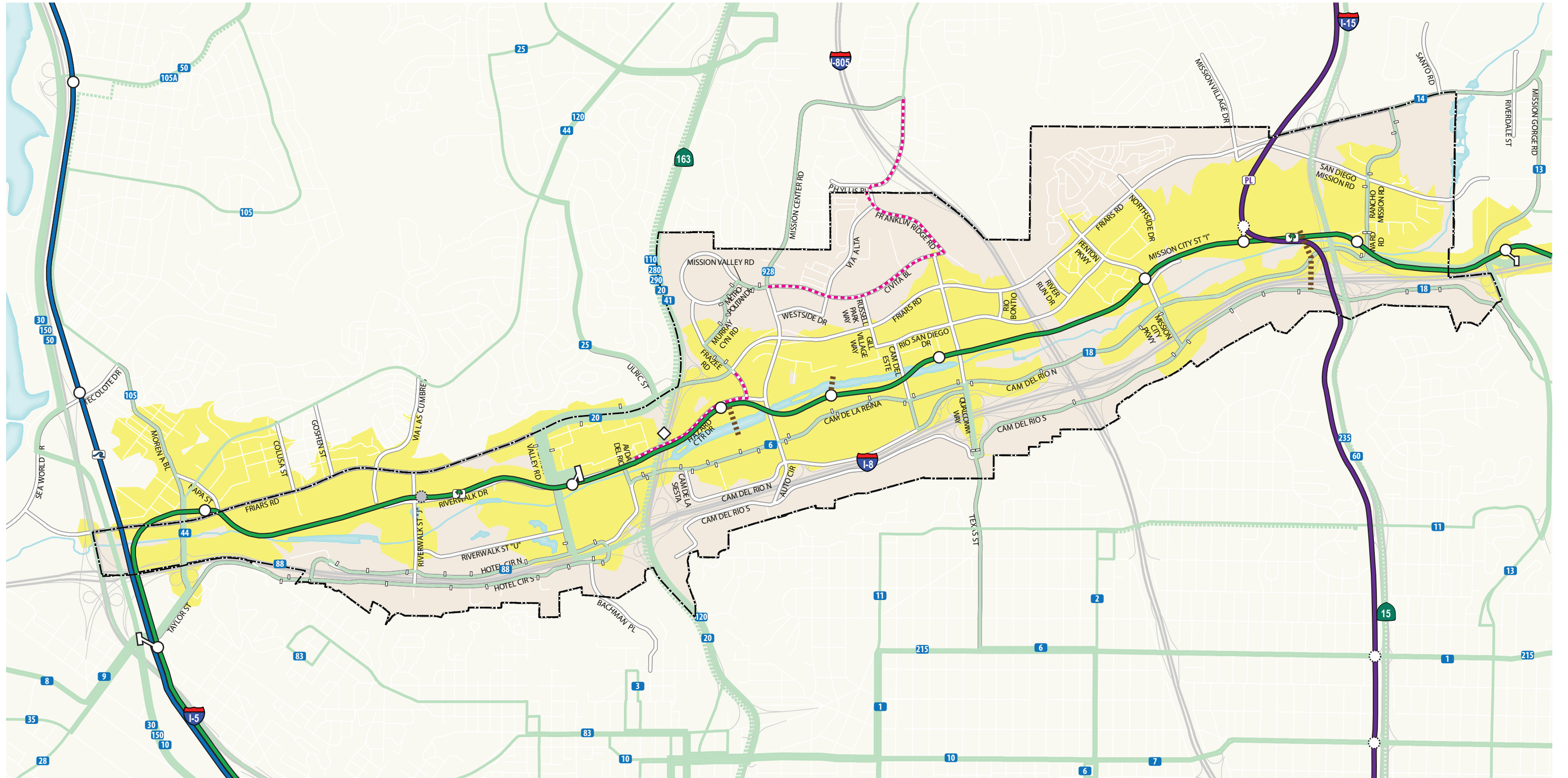
As future Rapid Transit routes and community circulator routes are identified and established, additional transit priority measures will be considered in coordination with MTS and community circulator operators in an effort to maximize route efficiency and on-time performance. The proposed CPU includes the following planned transit priority measures:

- **Qualcomm Way, between Camino De La Reina and Camino Del Rio North.** One northbound through lane would be converted to a Transit Only northbound left-turn lane.
- **Qualcomm Way / Camino De La Reina.** A northbound left-turn lane transit queue jump phase would facilitate priority for the Transit Only lane to bypass other left-turning vehicles.
- **Fashion Valley Road / Friars Road.** One westbound left-turn lane would be converted to a Transit Only lane with transit signal priority.

The proposed CPU would support implementation of the transit improvements identified in the RP by including policies that support prioritizing the transit system and improving efficiency of transit services. For example, a number of transit-focused Mobility Element policies are included in the proposed CPU that would support efforts to develop planned transit facilities. In addition, the proposed CPU provides for a complete bicycle and pedestrian network connecting with and improving access to transit.⁵ Thus, implementation of the proposed CPU would not interfere with implementation of planned transit improvements and would provide policy support for their implementation. Impacts related to conflicts with existing or planned transit facilities would be less than significant.

⁵ See Policies for Development TRN-1 and TRN-2, and Implementing Actions IA-2, IA-11, and IA-12 through IA-19.

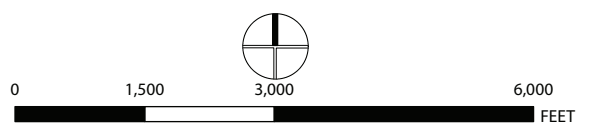
Figure 4.13-5: Planned Transit Facilities



- # Existing Bus Routes
- Existing Bus Stops
- San Diego Trolley Green Line
- San Diego Trolley Purple Line (Planned)
- Existing Light Rail Stations
- Direct Transfer Stations
- Planned Light Rail Station
- Potential Riverwalk Station

- - - Potential Route Adjustments
- - - Potential Bridge Connections to Light Rail Stations
- 0.5 Mile Pedestrian Walk Shed from Light Rail Stations

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Bicycle Facilities

The project would support existing plans and policies relative to the bicycle network. The bicycle facility network in the proposed CPU is shown in Figure 4.13-3. The Mobility Element includes several bicycle-focused policies that support installation of bicycle parking facilities, implementation of new separated and on-street bicycle facilities, and increasing the level of bicycle comfort and safety for all levels of bicycle riders. Policies in the proposed CPU support coordination with SANDAG on the planning and implementation of regional bicycle facilities and support increased bicycle comfort and safety, repurposing right-of-way for bicycle facilities, and bike sharing.⁶ Thus, implementation of the proposed CPU would not conflict with adopted policies, plans, or programs supporting bicycle facilities.

A key focus of the San Diego Regional Bike Plan prepared by SANDAG is to develop an interconnected network of bicycle corridors to improve the connectivity and quality of bicycle facilities and their supporting facilities. Similarly, the City of San Diego Bicycle Master Plan establishes guidance on achieving an ideal bicycle environment throughout the City and refines the Regional Bike Plan to include community-wide bicycle facilities. Together these facilities promote intra-community and inter-community bicycle trips to strengthen connections within the planning area and between adjacent communities. In the Mission Valley community, the Regional Bike Plan identifies the following regional connections:

- **I-15 Bikeway.** Class I path parallel to I-15 from the northern San Diego County limit to University Avenue.
- **San Diego River Bikeway.** Class I path parallel to the San Diego River from the coast to the I-8 Corridor in Santee at Mission Gorge Road.
- **Clairemont-Centre City Corridor.** Connects the Clairemont community to Mission Valley, Uptown, and Downtown San Diego via Genesee Avenue, Linda Vista Road, Ulric Street, Bachman Place, Fourth Avenue and Fifth Avenue.

The City of San Diego Bicycle Master Plan recommends additional facilities on the local street network. The proposed CPU recommends a variety of bicycle facilities, including multi-use paths (Class I), bicycle lanes (Class II), bicycle routes (Class III), and Cycle Tracks (Class IV). The proposed CPU includes facilities that build on those identified in the Regional Bike Plan and City of San Diego Bicycle Master Plan, while also identifying new recommendations and improving upon existing facilities through an emphasis on protected facilities such as multi-use paths and cycle tracks.

The following bicycle facilities are planned for the Mission Valley community as part of the proposed CPU or the San Diego Regional Bike Plan, Riding to 2050.

Class I Bike Path

These include all multi-use bridges discussed under Pedestrian Improvements.

⁶ See Policies for Development BIC-1 through BIC-4 and Implementing Actions IA-7 through IA-11.

- San Diego River Trail extension for the following segments:
 1. From western terminus of Hotel Circle Place to San Diego River Trail terminus
 2. From Sefton Field/Cottonwood Grove Park to Friars Road/YMCA
 3. From YMCA to Fashion Valley Road (North of the River)
 4. Connecting the North and South River Trails (Near Riverwalk Street “J”)
 5. From Friars Road to Fashion Valley Road
 6. Between Hotel Circle Place and Fashion Valley Road (South of the River)
 7. From Town & Country Pedestrian Bridge to SR-163 (South of the River)
 8. From East of the I-805 to Del Rio Apartments Community (North of the River)
 9. From terminus at Qualcomm way to Camino Del Rio North (Discovery Center – South of the River)
 10. From East of Fenton Parkway to Eastern Community Boundary
- Parallel to SR-163 from Riverwalk Drive eastern terminus to Friars Road (Regional Plan)
- I-15 Bikeway, from future San Diego River Trail extension to Camino Del Rio South (Regional Plan)
- Friars Road to Riverwalk Drive
- Multi-Use Bridge over the San Diego River, south of the Hazard Center Trolley Station
- Multi-Use Bridge over Friars Road, east of Frazee Road
- Multi-Use Bridge over San Diego River, north of the Mission Valley Center Trolley Station
- Multi-Use Bridge over Friars Road, west of Qualcomm Way, Connecting Civita development to Rio Vista Shopping Center
- ~~San Diego River Trail extension, from east of I 805 to Del Rio Apartments community~~
~~San Diego River Trail extension, east of Fenton Parkway~~

Class II Bike Lane (buffered where feasible)

- Friars Road, from Ulric Street/SR-163 SB Ramps to Frazee Road
- Bachmann Place, from Hotel Circle South to community boundary
- Camino De La Reina, from west of Camino De La Siesta to Mission Center Road
- Camino De La Reina from Westfield Driveway to Qualcomm Way
- Mission Valley Road/Metropolitan Drive loop (full extent)
- Murray Canyon Road, from Metropolitan Drive to Frazee Road
- Frazee Road, from Mission Valley Road to Murray Canyon Road
- Frazee Road, from Murray Canyon Road to Friars Road (northbound only)

- Frazee Road, from Friars Road to Hazard Center Drive
- Qualcomm Way, from Camino De La Reina to Camino Del Rio South
- Rio San Diego Drive, from Qualcomm Way to Fenton Parkway
- Mission City Parkway, from Fenton Parkway terminus to Camino Del Rio South
- San Diego Mission Road, from Mission Village Drive to Rancho Mission Road
- Camino Del Rio North, from Mission City Parkway to existing Bike Lanes to the east
- Camino Del Rio South, from Auto Circle to approximately 2,100' to the west
- Camino Del Rio South, from Texas Street and Mission City Parkway
- Camino Del Rio South, from I-15 northbound ramps to eastern community boundary
- Riverwalk Drive, from western terminus to Fashion Valley Road
- Rancho Mission Road, from San Diego Stadium to Ward Road
- Auto Circle/Mission Center Road, from Camino Del Rio South to Camino Del Rio North
- Hazard Center Drive, from Frazee Road to Mission Center Road
- ~~New~~ Mission City Street "I", from Fenton Parkway/Mission City Parkway to eastern terminus
- ~~New~~ Riverwalk Street "J" (the Cross-Valley Connection), from Friars Road to Hotel Circle South
- Via Las Cumbres, from Friars Road to southern terminus

Class IV Cycle Track

- Hotel Circle North & Hotel Circle South (two-way cycle track)
- Friars Road, from approximately 900' west of Fashion Valley Road to Fashion Valley Road (two-way cycle track)
- Friars Road, from Fashion Valley Road to Ulric Street/SR-163 SB Ramps (one-way cycle track)
- Friars Road, from Frazee Road to the eastern community boundary (one-way cycle track)
- Fashion Valley Road, from Friars Road to Hotel Circle North (two-way cycle track)
- Avenida Del Rio from Riverwalk Drive to Camino De La Reina (two-way cycle track) – currently in Final Design Phase
- Camino De La Reina from Hotel Circle N to San Diego River Trail extension east of Avenida Del Rio (two-way cycle track) – currently in Final Design
- ~~Levi~~ Riverwalk ~~Cushman~~ Street "UB", Riverwalk Street "J" to Fashion Valley Road (two-way cycle track)
- Rancho Mission Road, Friars Road to Camino Del Rio North (one-way cycle track)
- Pacific Highway, from northern to southern community boundary (one-way cycle track)

Bicycle Signal Phasing (Included with Two-Way Cycle Tracks per the Mission Valley Community Plan Update Mobility Technical Report (2018))

- Via Las Cumbres / Friars Road (north and south legs)
- Fashion Valley Road / Friars Road (all legs)
- Hotel Circle Place / Hotel Circle North (north leg)
- Fashion Valley Road / Hotel Circle North (north leg)
- I-15 Northbound Ramps / Camino del Rio South (*implemented across east leg*)
- Hotel Circle North / Hotel Circle South / Taylor Street (west leg)
- Bachman Place / Hotel Circle South (south leg)
- Fashion Valley Road / Riverwalk Drive (west leg)
- Fashion Valley Road / Riverwalk Levi Cushman Street “UB” (west leg)
- ~~New~~ Riverwalk Street “J” / Hotel Circle North (north leg)
- ~~New~~ Riverwalk Street “J” / Hotel Circle South (north leg)
- Camino De La Reina / Hotel Circle North (east leg)

Pedestrian Facilities

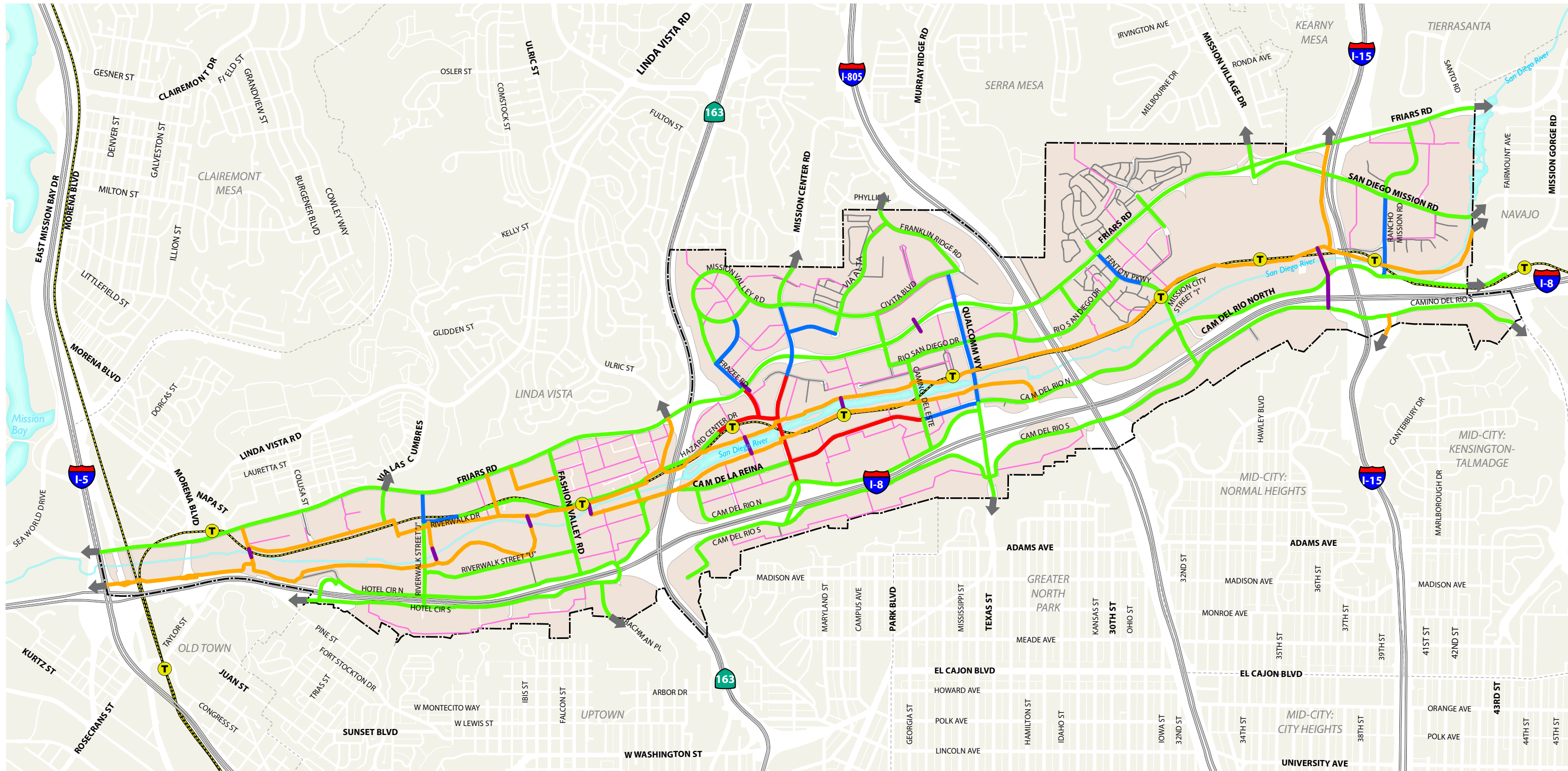
The Proposed CPU includes a network of planned pedestrian facilities to support the level of pedestrian traffic in the area, as shown in Figure 4.13-6. The following pedestrian facilities are planned for the Mission Valley community as part of the Proposed CPU.

Paseos and Pedestrian Route Types

Pedestrian route types are used to categorize pedestrian facilities based on adjacent uses and characteristics of the walking environment. The City of San Diego Pedestrian Master Plan defines size route types, each suggesting a level of treatments or features that best supports the specific area’s walking environment. Paseos are one route type that is particularly suitable within the context of Mission Valley.

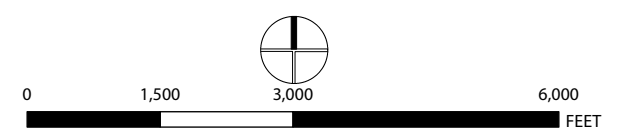
A series of paseos or walkways would help transform large parcels into permeable environments, resulting in more direct and convenient pedestrian connections. The paseos would aid in creating a stronger bicycle and pedestrian grid network, reducing travel times through improved connectivity between trip origins and destinations. The paseos are used to break up large parcels and are concentrated within the center of the community where four Green Line Trolley stations are closely spaced. They would effectively create shorter blocks for pedestrians, reducing the time it takes to access nearby trolley stations. The environments surrounding the paseos will vary, with the exception that adjacent vehicles would either be low-speed vehicles or absent altogether. Paseos cut through large parcels, and may run adjacent to buildings, through parking lots or along parcel peripheries – all away from high speed, high volume roadways.

Figure 4.13-6: Proposed CPU Pedestrian Route Types



Trolley Stops	Pedestrian Route Type	Paseos	Lakes/Ponds/Bays
Light Rail	District	Neighborhood	Mission Valley Community Plan Boundary
Ramps	Corridor	Path	Community Planning Areas
Streams/Creeks	Connector	Bridge	
		Routes in Adjacent Community	

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Connector and Neighborhood route types run along roadways with moderate to high vehicular traffic and low pedestrian levels, requiring the most basic level of treatments such as landscaped buffers between the sidewalk and roadway and mandatory features like curb ramps. The Corridor route types are present along roadways that support business and shopping districts with moderate pedestrian levels and include more enhanced treatments such as pedestrian lighting and trees to shade walkways. District route types support heavy pedestrian levels in mixed-use urban areas, consisting of the premium features like median refuges and controls at crossings, wider minimum walkway widths (>5'), and street furnishings.

Bridge Connections

The Proposed CPU includes six additional planned bridge connections planned solely for use by pedestrians and bicycles, including the following:

- YMCA to Sefton Field (San Diego River Trail extension)
- Hazard Center Trolley Station to the southern San Diego River Trail
- Mission Valley Center Trolley Station to the northern San Diego River
- Frazee Road across Friars Road
- Friars Road, west of Qualcomm Way (Connecting Civita development to Rio Vista Shopping Center)
- I-15 Bikeway, from future San Diego River Trail extension to Camino Del Rio South

In addition to the multi-use bridges, two new roadway connections would greatly benefit pedestrians. The addition of proposed Riverwalk Street "J" from Friars Road to Hotel Circle South would provide a new point for pedestrians to cross under the Green Line Trolley tracks and over the San Diego River and Interstate 8. Riverwalk Street "J" would also provide access to a potential new Green Line Trolley Station.

The extension of Fenton Parkway to Mission City Parkway/Camino Del Rio North would improve access to the Green Line Fenton Parkway Station and better connect the office uses south of the San Diego River to the commercial and residential areas to the north.

Figure 4.13-6 displays the planned pedestrian route types, multi-use bridges, and roadway extensions.

Lead Pedestrian Intervals

Per the Mission Valley Community Plan Update Mobility Technical Report (2018) and IA-5 of the CPU, Lead Pedestrian Intervals (LPIs) are ~~planned~~ a recommended pedestrian treatment to improve pedestrian safety and efficiency at intersection locations along District and Corridor Pedestrian Route Types and at intersections with high existing pedestrian volume locations (defined as sixty or more pedestrians during peak periods). Additionally, locations where Lead Bicycle Intervals are recommended also receive LPIs without any additional modification to the signal timing. LPIs are ~~planned~~ recommended at the following intersections:

- Mission Center Road / Westside Drive (north and east legs)
- Via Las Cumbres / Friars Road (north and south legs)
- Fashion Valley Road / Friars Road (all legs)
- Mission Center Road / Friars Road WB Ramps (south, east, and west legs)
- Mission Center Road / Friars Road EB Ramps (south, east, and west legs)
- Qualcomm Way / Friars Road WB Ramps (north, east, and west legs)
- Qualcomm Way / Friars Road EB Ramps (south, east, and west legs)
- Fenton Parkway / Friars Road (all legs)
- Mission Center Road / Mission Center Court (all legs)
- Qualcomm Way / Rio San Diego Drive (all legs)
- Fenton Parkway / Rio San Diego Drive (all legs)
- Rancho Mission Road / San Diego Mission Road (all legs)
- Mission Center Road / Hazard Center Drive (south and west legs)
- Mission Center Road / Camino De La Reina (all legs)
- Mission Center Road / Camino Del Rio North (north leg)
- Camino del Este / Camino De La Reina (all legs)
- Ward Road / Camino Del Rio South (north leg)
- Hotel Circle North / Hotel Circle Place (north leg)
- Fashion Valley Road / Hotel Circle North (north leg)
- Hotel Circle North / Hotel Circle South / Taylor Street (west leg)
- Bachman Place / Hotel Circle South (south leg)
- Riverwalk Street “J” / Riverwalk Drive (all legs)
- Fashion Valley Road / Riverwalk Drive (west leg)
- Fashion Valley Road / ~~Levi Cushman~~ Riverwalk Street “UB” (west leg)
- Riverwalk Street “J” / Hotel Circle North (north leg)

- Riverwalk Street “J” / Hotel Circle South (south leg)
- Hotel Circle North / Hotel Circle South / Camino De La Reina (east leg)
- Qualcomm Way / Civita Boulevard (west leg)
- Frazee Road / Murray Canyon Road – if signal warrants are met (south and east leg)
- Frazee Road / Friars Road (north, south, and east legs)
- Frazee Road / Hazard Center Drive (north, east, and west legs)
- Napa Street / Friars Road (north and east legs)

New Sidewalks

Per IA-1 and the Mission Valley Community Plan Update Mobility Technical Report (2018) Sidewalk facilities are ~~planned~~ recommended along all new roadways as well as the following segments where missing sidewalks were identified through the existing conditions analysis:

- Pacific Highway, from northern to southern community boundary (west and east side)
- Taylor Street, Hotel Circle South to western community boundary (south side)
- Hotel Circle Place, approximately 330’ east of western terminus, to approximately 430’ to the east (north side)
- Hotel Circle North, Fashion Valley Road to Camino De La Reina (north side)
- Camino De La Reina, Hotel Circle North/South to approximately 1,100’ to the northeast (south side)
- Friars Road, Ulric Street to approximately 350’ west of Frazee Road (north side)
- Hotel Court, south of Hotel Circle South (west side)
- Fashion Valley Road, from approximately 620’ south of Friars Road to southern terminus (west side)
- Camino Del Rio North, from approximately 800’ east of Mission Center Road to Bus Access Road (north side)
- Camino Del Arroyo, full extent (east side)
- Frazee Road, north of Murray Canyon Road (west side)
- Friars Road, from approximately 280’ east of Frazee Road to EB Friars Road off-ramp at Mission Center Road (south side)
- EB Friars Road off-ramp at Mission Center Road, full extent (south side)
- Glasoe Lane, full extent (west side)
- Camino Del Este, from approximately 180’ south of Camino De La Reina to southern terminus – westside
- Qualcomm Way, between Friars Road on- and off-ramps (west and east side)
- Qualcomm Way, Camino De La Reina to Camino Del Rio North (west and east side)

- Qualcomm Way, I-8 WB off-ramp to 100' north of Camino Del Rio South (east side)
- Texas Street, from Camino Del Rio South to southern community boundary (west side)
- WB Friars Road off-ramp at Qualcomm Way, full extent (north side)
- Friars Road, from WB Friars Road off-ramp at Qualcomm Way to approximately 510' west of Rio Bonito Way (north side)
- Camino Del Rio South, Qualcomm Way to approximately 1860' to the east (north side)
- Camino Del Rio South, from approximately 280' west of Mission City Parkway to approximately 570' west of Mission City Parkway (north side)
- Camino Del Rio South, from approximately 1,500' west of Mission City Parkway to approximately 1900' west of Mission City Parkway (north side)
- Mission City Parkway, Camino Del Rio North to I-8 bridge (east side)
- Mission City Parkway, from approximately 490' south of Camino Del Rio North to southern terminus (west side)
- Scheidler Way, south of Camino Del Rio South (east side)
- Friars Road, Qualcomm Way to EB Friars Road off-ramp at Mission Village Drive (south side)
- Friars Road, east of Mission Village Drive ramps to east of I-15 NB ramps (north and south side)
- San Diego Mission Road, from approximately 480' east of Mission Village Drive to Rancho Mission Road (north side)
- San Diego Mission Road, Nazareth Drive to approximately 1,370' to the east (north side) (this segment is currently in Final Design/Construction).

Pedestrian Access Prohibited

Additional segments were identified as missing sidewalks during the existing conditions phase, however, due to the absence of adjacent active land uses or the absence of additional network connections, pedestrian access is not ~~planned~~ recommended along these segments, thus negating the need for sidewalks:

- Camino Del Rio North, from Camino De La Siesta to Qualcomm Way (south side)
- Mission Center Road, from Camino Del Rio North to Camino Del Rio South (east side)
- Friars Road, between Mission Center Road ramps (both sides)
- EB Friars Road on- and off-ramp at Mission Center Road, full extent (north side)
- WB Friars Road on- and off-ramp at Mission Center Road, full extent (south side)
- Friars Road, between Qualcomm Way ramps (both sides)
- EB Friars Road on- and off-ramp at Qualcomm Way, full extent (north side)
- WB Friars Road on- and off-ramp at Qualcomm Way, full extent (south side)

- Friars Road, between Mission Village Drive ramps (both sides)
- WB Friars Road on- and off-ramp at Mission Village Drive, full extent (south side)
- EB Friars Road on- and off-ramp at Mission Village Drive, full extent (north side)
- Camino Del Rio South, from approximately 2,000' west of Auto Circle to Qualcomm Way (north side)
- Camino Del Rio South, from Mission City Parkway to Scheidler Way (north side)

Consistent with the segments, pedestrian access would not be planned across the following intersection legs where no active land uses or network connections are accessed:

- Ward Road / Camino Del Rio North (west leg)
- Camino Del Este / Camino Del Rio North (west leg)
- Theater Driveway / Camino Del Rio North (west leg)

The proposed CPU Mobility Element includes policies that support enhancements to pedestrian travel within the CPU area such as implementing the multi-use urban path system, constructing sidewalk and intersection improvements, and installing missing sidewalks and curb ramps.⁷ In addition, the impact fee study for the proposed CPU will include planned pedestrian improvements to install curb ramps, sidewalks, and audible pedestrian signals to meet ADA standards. Implementation of the proposed CPU would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, impacts would be less than significant.

⁷ See Policies for Development WLK-1 through WLK-5 and Implementing Actions IA-1 through IA-6.

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4.14 Visual Effects and Neighborhood Character

This section analyzes the potential significant impacts to visual effects and neighborhood character due to the implementation of the proposed CPU. This section includes a description of the built and natural resources within the CPU area and describes relevant existing plans, policies, and regulations. Information in this section is based on the existing conditions background studies conducted as part of the CPU process (Dyett & Bhatia, 2016).

4.14.1 Environmental Setting

4.14.1.1 PHYSICAL SETTING

Structure and Built Form

Mission Valley is an approximately one-mile wide river valley trending east-west, through which the San Diego River flows westward to the Pacific Ocean. The San Diego River lies at the valley floor and creates a natural linkage among the community's neighborhoods and open spaces.

The San Diego River takes on a variety of natural forms within the CPU area. The eastern portion of the river is highly vegetated and uninterrupted by urban activities. In central Mission Valley, the river is surrounded by urban development and accommodates a range of recreational amenities including the San Diego River Pathway. In the western portion, the river flows through a golf course and gradually turns into a wetland before emptying into the Pacific Ocean.

North and south of the river corridor, the CPU area slopes up, with hillsides on the north and south sides of the CPU area. North of the river, the CPU area reaches a maximum elevation of 361 feet above sea level in the area near Interstate (I-) 805; and south of the river, near Qualcomm Way/Texas Street, the CPU area reaches a maximum elevation of 307 feet above sea level. Overall, 13 percent of the CPU terrain is at a slope of between 15 and 25 percent, and 14 percent of the CPU area has a slope above 25 percent. The varying topography creates ample vantage points throughout the CPU area for panoramic views of the community, the opposing hillside, and the San Diego River.

In addition to the natural landforms, major structural elements include freeways (I-5, I-8, State Route [SR-] 163, I-805, and I-15) and arterial roads (Friars Road, Mission Center Road, Camino de la Reina, and Qualcomm Way). The area south of I-8 features primarily professional offices, hotels, and auto-related commercial uses against steep hills, with buildings generally oriented towards I-8.

The lack of local north-south connections causes this area to be somewhat isolated from the rest of Mission Valley.

The valley floor encompasses the area between I-8 and Friars Road. This area has mildly sloped terrain and a wide variety of land uses including multi-family residential uses, commercial uses, offices, hotels, and sports/recreational facilities. Most of Mission Valley's landmarks—including the Stadium, Fashion Valley Mall, Westfield Mission Valley, Fenton Marketplace, and the Riverwalk Golf Club—lie within the valley floor. The area north of Friars Road varies in form and structure; this area includes the office development along Mission Valley Drive, the mixed-use Civita development currently under construction, and the residential neighborhoods along Fenton Parkway and Northside Drive. Buildings in this area are generally oriented toward local roadways and drive aisles.

Block sizes and shapes are generally irregular. Some superblocks (generally defined as blocks having lengths over 2,000 feet) as well as some compact, gridded blocks (block lengths under 400 feet) can be found in certain areas, while most block sizes are between 400 and 2,000 feet in length. Most blocks are lined with sidewalks.

Scenic Resources

San Diego River

The San Diego River is a major visual asset of the Mission Valley community. Public views of the river are afforded from the San Diego River Pathway, roadways that traverse the river, and the elevated Green Line trolley route. Elsewhere, views of the river are generally obscured by buildings, roadways, or vegetation. Roadways with views of the river are limited to those that cross it: Qualcomm Way, Camino Del Este, Mission Center Road, Fashion Valley Road, and Morena Boulevard. The images below show the San Diego River from four different locations within the CPU area.



View of the San Diego River corridor from Camino del Este, looking west.



The San Diego River as seen from Camino del Este, looking northeast.



The San Diego River as seen from the River Pathway near Mission Center Road, looking north.



The San Diego River as seen from the trolley above Mission Center Road, looking southwest.

View Corridors and Viewsheds

View corridors and viewsheds in the CPU area are limited to views of the hillsides and ridges to the south. These views are afforded at locations throughout the valley floor, as well as from limited vantage points on the southern slopes themselves. The adopted Mission Valley Community Plan does not designate official view corridors and viewsheds. The images below show vantage points of views of the hillsides and valley from within the CPU area.



View of the hills to the south, looking south along Mission Center Road.



View of the hills to the south from the Fenton Parkway trolley station.



View of the valley from Hillside Professional Center, looking north.



View of the valley from Hotel Court, looking north.

Light and Glare

Light and glare sources within the CPU area are primarily associated with residential, commercial, and industrial land uses. Street lights are provided at greatest frequency along major streets, such as Friars Road. Daytime light and glare from building windows, automobile windshields, and paved surfaces in developed areas are typical for an urban setting. Nighttime light from roadways, billboards, commercial signage, buildings, automobile headlights, and parking lot/security lighting exists throughout the CPU area.

4.14.1.2 REGULATORY SETTING

State Regulations

California Scenic Highways Program

Recognizing the value of scenic areas and the value of views from roads in such areas, the California State Legislature established the California Scenic Highway Program in 1963. This legislation sees scenic highways as “a vital part of the all-encompassing effort...to protect and enhance California’s beauty, amenity and quality of life.” Under this program, a number of state highways have been designated as eligible for inclusion as scenic routes. There are no State-designated Scenic Highways in the CPU area, although I-5 and I-8 are listed as eligible for designation (Caltrans, 2017).

Local Regulations

City of San Diego General Plan

Urban Design Element

The Urban Design Element of the General Plan provides guidance on respecting and elevating the City’s “core values” related to urban form, including the natural environment; unique habitat and topography; compact and environmentally sensitive development patterns; and physical, social, and cultural diversity. The Urban Design Element includes general policies, as well as policies relating to distinctive neighborhoods and residential design, mixed-use villages and commercial areas, office and business park development, public spaces and civic architecture, and public art and cultural amenities. Specifically, policies in the Urban Design Element require that open space

and landscape be used to define and link communities, and that development is designed to highlight and complement adjacent natural features. In terms of building design, the Urban Design Element calls for street frontages with architectural and landscape interest that provide visual appeal to the streetscape and enhance the pedestrian experience. Underground and above-ground parking structures are encouraged to reduce the amount and visual impact of surface parking; similarly, the visual impact of utilities and wireless facilities is to be minimized through their concealment and design. Policies relating specifically to residential design call for design continuity and compatibility with the larger neighborhood community and for subdivision design to maintain community character. Per the Urban Design Element, neighborhood streets are to improve walkability, strengthen connectivity, and enhance community identity. Similarly, mixed-use villages and commercial areas are to exhibit distinctive architectural features to differentiate residential, commercial, and mixed-use buildings and promote a sense of identity to village centers, while the public streetscape is to be designed for greater walkability and neighborhood aesthetics. Policies related to office and business park development require high quality design of buildings, structures, and parking areas, and public and cultural amenities are to be integrated into development to improve the quality of new development and reinforce community identity.

Conservation Element

The Conservation Element of the General Plan guides the sustainable management of the city's natural resources, with sections on open space and landform preservation, wetlands, and the urban forest. Policies call for the conservation of landforms, canyon lands, and open spaces that define the city's urban form, serve as core biological areas and wildlife linkages, or are wetland habitats. Policies related to wetlands require a watershed planning approach that preserves and enhances wetlands, and policies related to urban forestry call for the planting of large canopy shade trees where appropriate and with consideration of habitat and water conservation goals, as well as the retention of significant and mature trees.

San Diego Municipal Code

Planned District Ordinances

The San Diego Municipal Code (SDMC) contains Planned District Ordinances (PDOs) specific to San Diego communities. The Mission Valley PDO (SDMC Chapter 15, Article 14) establishes three districts: the Development Intensity Overlay District, which applies to the entire CPU area and limits development intensity to the levels allowed in the current Community Plan; the San Diego River Subdistrict, which ensures that development along the San Diego River implements the San Diego River Park Master Plan; and the Hillside Conservation, Design, and Height Limitation Subdistrict, which ensures that projects in hillside areas respect, preserve, and/or recreate hillside areas. The Mission Valley PDO also includes sections that establish development regulations for zones specific to Mission Valley, all of which have an MV- prefix. In these sections, the PDO regulates elements such as density; maximum lot coverage; floor area ratios; front, rear, and side yard setbacks; and architectural design. Lastly, the Mission Valley PDO includes general and supplemental regulations that address topics including landscaping, parking, signage, and lighting.

Zones

SDMC Chapter 13 includes land development and design standards by zones not addressed in the Mission Valley PDO (zones that do not begin with an MV- prefix), including the City's base and overlay zones.

Grading Regulations

SDMC Chapter 14, Article 2, Division 1 addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation. Included in this section are development standards for grading and maximum slope gradients.

Landscape Regulations

SDMC Chapter 14, Article 2, Division 4 addresses planting and irrigation requirements; yard planting area and point requirements; street tree requirements; revegetation and erosion control; brush management; and water conservation.

Off-Site Development Impact Regulations

SDMC Chapter 14, Article 2, Division 7 provides standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. Glare Regulations limit the percentage of a building's exterior that may be comprised of reflective material and limit the use of reflective material where it could contribute to traffic hazards, diminish quality of riparian habitat, or reduce enjoyment of public open space. Outdoor Lighting Regulations address lighting design and installation to minimize negative impacts from light pollution to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination.

Environmentally Sensitive Lands Regulations

SDMC Chapter 14, Article 3, Division 1 addresses steep hillsides and Special Flood Hazard Areas (SFHA). Steep hillsides are defined as hillsides at least 50 feet deep with a slope of 25 percent or greater. SFHAs are areas located within the 100-year floodplain.

Green Building Regulations

SDMC Chapter 14, Article 10 details the use of building concepts to reduce negative environmental impacts or create positive environmental impacts, and encourage sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. According to the regulations, new outdoor lighting fixtures must minimize light trespass where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. The regulations prohibit direct-beam illumination from leaving the premises and requires that most outdoor lighting be turned off between 11:00 p.m. and 6:00 a.m. with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 p.m. for public safety).

MHPA Land Use Adjacency Guidelines

To address the integrity of the Multi-Habitat Planning Area (MHPA) and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. These MHPA Land Use Adjacency Guidelines are used during project implementation to address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development.

San Diego River Park Master Plan

Adopted in 2013, the San Diego River Park Master Plan is a policy document that provides a common vision and recommendations to guide land use decisions along the San Diego River. The Master Plan includes “reorient[ing] development toward the river to create value and opportunities for people to embrace the river” as one of the five guiding principles for river-adjacent development. Notably, the Master Plan envisions the creation of a district, an identifiable park along the river, and a designated River Corridor for the river, wildlife, and people. The Master Plan also includes recommendations specific to the river segment within the CPU area, including establishing “Green Gateways” under freeways and providing interpretive signage with the historical context of the San Diego River.

4.14.2 Impact Analysis

4.14.2.1 SIGNIFICANCE CRITERIA

Thresholds used to evaluate potential impacts related to visual effects and neighborhood character are based on the City’s CEQA Significance Determination Thresholds (2016) which have been modified to reflect a programmatic analysis for the proposed CPU. A significant impact to visual effects and neighborhood character could occur if implementation of the proposed CPU would:

- 1) Result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan;
- 2) Result in a substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area;
- 3) Result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;
- 4) Result in a substantial change in the existing landform; or
- 5) Create substantial light or glare which would adversely affect daytime and nighttime views in the area.

4.14.2.2 METHODOLOGY AND ASSUMPTIONS

Visual effects and neighborhood character are generally subjective by nature and, therefore, the level of the proposed CPU's visual impact is difficult to quantify. As such, this analysis was conducted qualitatively, assessing potential implications of growth occurring consistent with the proposed CPU on the existing visual character of the CPU area. Potential impacts resulting from implementation of the proposed CPU were evaluated based on information from the existing conditions assessments of urban design, recreation, and conservation in the CPU area. The assessments were made using data from observation, spatial analysis, and a photographic inventory.

4.14.2.3 IMPACTS

Impact 4.14-1: Obstruction of Vistas or Scenic Views

Would the proposed CPU result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?

While the adopted Mission Valley Community Plan does not identify any official view corridors or viewsheds, numerous scenic vistas and views exist in the CPU area, including views of the San Diego River, the hillsides and ridges at the south edge of the CPU area, and the valley from the southern hillsides. Due to the dense vegetation along both sides of river, existing views of the river are limited to pedestrian- and bicycle-only areas alongside the river and the segments of roadways and the trolley line that cross over it. Views of and from the southern slopes are also limited by vegetation and existing structures.

Given the developed nature of the CPU area, future projects in the CPU area would blend in with the existing urban framework through established height and setback regulations and would not result in new obstructions to views from public areas where views exist. For the area along the San Diego River, ~~SDMC the San Diego River Subdistrict CPIOZ would place restrictions on development within the River Corridor Area, or the "River Subdistrict," would to ensure that existing views from the San Diego River Pathway, roadway bridges, and trolley bridges are not obstructed (SDMC Chapter 15, Article 14, Division 3).~~ For the area south of I-8, the proposed CPU would protect public views of the hillsides by requiring new development above 40 feet to preserve and revegetate natural hillsides and create open public view corridors. Additionally, proposed CPU policies would support development within the River Corridor Area that is consistent with the City's General Plan, San Diego River Parks Master Plan, and the Land Development Code.

Implementation of the proposed CPU would not result in a substantial alteration or blockage of public views from critical view corridors, designated open space areas, public roads, or public parks; new development within the community would take place within the constraints of the existing urban framework and development pattern. Thus, future development would not result in a substantial obstruction of a vista or scenic view from a public viewing area. Impacts would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.14-2: Adverse Alteration to Character

Would the proposed CPU result in substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area?

Mission Valley is largely a developed, urbanized community, thus future development would be in line with the urbanized nature of the CPU area. Future development projects would be undertaken in accordance with the General Plan, which provides direction on urban design, and the SDMC, which provides development standards by zone. As an amendment to the General Plan, the proposed CPU maintains existing policies and regulations related to bulk, scale, materials, and style. As part of the proposed CPU implementation, the SDMC would be amended to add CPIOZ regulations from the existing Mission Valley PDO to provide consistent development standards.

In addition, the proposed CPU includes policies related to blocks and lots, streetscapes, building placement and orientation, and building form and design. Proposed CPU policies would require blocks to be walkable and enhance overall connectivity and access throughout the CPU area. Streetscape policies and implementing actions would result in amenities that are appropriate to the future roadway type, provide ample pedestrian and bicycle amenities, and a wide range of park types (i.e., pocket parks, non-traditional parks, trails, and other open spaces). These policies and guidelines would serve to direct future development in a manner that is consistent with or improves the character of the community.

In terms of building form and character, policies and implementing actions in the proposed CPU would result in buildings that face the street, with building doors, windows, and other openings to reflect pedestrian scale and movement and encourage a lively environment. The length of blank walls would be limited and building mass and roof design would be required to exhibit variation, visual interest, and a range of architectural elements. Implementation of these policies would provide specific policy support to ensure that the bulk and scale of development is not out of character with the existing environment.

Implementation of the proposed CPU would result in development that would be consistent with or enhance the existing neighborhood character. Impacts related to substantial alterations to the existing or planned character of the area would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.14-3: Loss of Trees

Would the proposed CPU result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?

No distinctive or landmark trees or mature stands of trees have been designated in the CPU area. The Hillside Subdistrict Guidelines for Discretionary Review, found in the Hillside Conservation, Design, and Height Limitation CPIOZ regulations, would preserve natural topographic features such as trees. The San Diego River CPIOZ regulations in the proposed CPU requires the use of tall canopy trees along the San Diego River Pathway and requires a mix of native trees in the River Corridor Area. Additionally, the proposed CPU includes policies that support the incorporation of street trees into sidewalk buffer areas near schools, transit areas, and private development in order to increase shade, promote carbon sequestration, shield pedestrian pathways, and provide additional vegetation in the urban environment. Impacts related to the loss of distinctive or landmark trees or mature stands of trees would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.14-4: Change in Existing Landform

Would the proposed CPU result in a substantial change in the existing landform?

The proposed CPU would entail the intensification of uses on the northern and southern hillsides of the CPU area. However, regulations in the San Diego River CPIOZ and the Hillside Conservation, Design, and Height Limitation CPIOZ¹ would ensure that impacts to the existing landform would be less than significant by regulating grading in the river area and on hillsides, supporting the conservation of existing landforms and open space, and supporting the design of buildings that respect existing landforms. Additionally, the proposed CPU contains policies and implementing actions that support minimizing changes to the existing landform by limiting grading, addressing erosion potential, and limiting disruption to the CPU area's hillsides. The proposed CPU would control potential erosion through maintenance of the natural contours of the development sites' terrain, hillside rehabilitation, phased grading, and prompt revegetation of all hillside grading areas with native and drought-resistant vegetation with high erosion control qualities. Implementation of proposed CPU policies regarding runoff control measures, grading, and resurfacing would provide specific policy support to minimize potential impacts related to the construction of new roadways and the resurfacing of existing roadways on future landforms.

As development within the CPU area occurs, any grading would comply with the San Diego River CPIOZ; the Hillside Conservation, Design, and Height Limitation CPIOZ; and the SDMC's grading and landscape regulations. Therefore, impacts to the landform from future development would be less than significant.

1. These regulations are currently part of the Mission Valley PDO and would be moved to the CPIOZ section of the SDMC as part of the proposed CPU implementation process.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

Impact 4.14-5: Light or Glare

Would the proposed CPU create substantial light or glare which would adversely affect daytime and nighttime views in the area?

Sources of light in the CPU area currently include those typical of an urban community, such as building lighting for residential and non-residential land uses, roadway infrastructure lighting, and signage. Future development implemented in accordance with the proposed CPU would necessitate the use of additional light fixtures and may contribute to existing conditions of light and glare. New light sources may include residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas.

Lighting policies included in the proposed CPU call for adequate lighting on new roadways and pedestrian pathways while encouraging lighting that is energy efficient and that minimizes light pollution. These policies would support existing lighting regulations in the SDMC. Outdoor lighting is regulated by the Off-Site Development Impact Regulations and Green Building Regulations of the SDMC to address negative impacts from light pollution and minimize conflict caused by unnecessary illumination.

Glare from new development under the proposed CPU would be regulated under SDMC Section 142.0730, which limits the area of reflective material permitted on buildings to ensure public safety. Lighting impacts to the MHPA that occur adjacent to the CPU area, including areas along the San Diego River, would be addressed through compliance with the MHPA Land Use Adjacency Guidelines, which require lighting of all developed areas adjacent to an MHPA to be directed away from the MHPA. To increase energy efficiency and minimize light pollution, proposed CPU policies recommend the installation of lighting with adaptive controls in new and infill development and LED streetlights with adaptive controls and smart sensors along roadways. Impacts associated with lighting and glare would be less than significant.

Mitigation Measures

Impacts would be less than significant; therefore, no mitigation measures are required.

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5 CEQA Required Conclusions

This section presents a summary of the cumulative impacts, growth-inducing impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant for the proposed CPU. These findings are based in part on the analysis provided in Chapter 4: Environmental Analysis.

5.1 Cumulative Impacts

Section 15355 of the California Environmental Quality Act (CEQA) Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” These individual effects may entail changes resulting from a single project or from a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects occurring over a period of time.

Section 15130 of the CEQA Guidelines requires that an EIR discuss the cumulative impacts of a project when the project’s incremental effect could be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects and the effects of probable future projects. Where a lead agency determines the project’s incremental effect would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts “...need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” Additionally, one of the following two possible approaches is required for considering cumulative effects:

- A list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the

cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

Pursuant to CEQA Guidelines Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, and may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans, and the lead agency determines that the regional or area-wide cumulative impacts of the project have already been adequately addressed in a certified EIR for that plan.

The cumulative impacts assessment in this section primarily relies on the cumulative impact determinations in the City's General Plan PEIR. The following issues were identified as cumulatively significant in the General Plan PEIR: agricultural resources, air quality, biological resources, geological conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, transportation/traffic/circulation/parking, visual effects and neighborhood character, water quality, and global warming (GHGs). Consistent with CEQA Guidelines Section 15130(e), where the significance of cumulative impacts was previously identified for the General Plan PEIR, and the proposed CPU is consistent, those impacts do not need to be analyzed further. The proposed CPU would add incremental effects to several of the issues identified above; however, the effects associated with the proposed CPU would also be cumulatively significant. Based on the noted considerations, the following issue areas identified as cumulatively significant in the General Plan PEIR are assessed below: Air Quality; Biological Resources; Geology, Soils, and Seismicity; Greenhouse Gas Emissions and Energy; Hazards and Hazardous Materials; Historical, Cultural, and Tribal Cultural Resources; Hydrology and Water Quality; Land Use; Noise; Paleontological Resources; Public Services and Facilities; Public Utilities and Infrastructure; Transportation; and Visual Effects and Neighborhood Character.

5.1.1 AIR QUALITY

Air Quality Plans

For purposes of this issue, the cumulative study area would be the San Diego Air Basin (SDAB). The analysis provided under Impact 4.1-1 is a cumulative analysis by nature because it discusses the proposed CPU's consistency with the air quality plan for the SDAB (i.e. the Regional Air Quality Strategy [RAQS]), which relies on the land use plans of the jurisdictions within the SDAB. Buildout of the proposed CPU would generate more criteria air pollutant emissions compared to buildout of the adopted Community Plan. Thus, the proposed CPU would result in greater emissions than what was anticipated when the RAQS were developed and would conflict with implementation of the air quality plan. Cumulative impacts related to conflicts with air quality plans would be significant.

Air Quality Standards

Construction

The cumulative study area for this issue would be the CPU area. As discussed in Section 4.1, individual construction projects that could occur within the CPU area would not exceed project level significance thresholds. Stadium demolition activities would likely exceed project level significance thresholds for air emissions, however measures would be implemented through the discretionary review process to ensure air emissions ~~association~~associated with demolition are mitigated. While the City would impose emissions reduction measures during individual project reviews, the actual future discretionary decisions of City decisionmakers cannot be mandated through the proposed CPU. As implementation of the proposed CPU could involve demolition and construction of a large stadium project, and would involve the construction of up to 27,910 additional housing units and 2,012,997 additional square feet of commercial uses, impacts are considered significant.

Operation

Regarding operational emissions, for purposes of this program level of analysis, consistency with the RAQS was considered the applicable threshold since the City's project-specific air quality impact screening levels shown in Table 4.1-2 would not be applicable to a Community Plan update. As discussed, buildout of the CPU area would result in emissions greater than what was used in the assumptions used to develop the RAQS; thus, overall buildout of the CPU area would result in operational emission impacts. Since the RAQS are established for the SDAB, which is the cumulative study area for air quality emissions, buildout of the land uses within the CPU area would have the potential to result in a significant cumulative impact. Thus, cumulative operational emissions associated with buildout of the proposed CPU would be significant.

Sensitive Receptors

Carbon Monoxide Hot Spots

As discussed under Impact 4.1-3, implementation of the proposed CPU is not anticipated to result in a carbon monoxide (CO) hot spot. Since CO hot spots are a localized phenomenon, development within the region would not contribute to a cumulative CO hot spot impact.

Toxic Air Emissions

CONSTRUCTION

Considering the highly dispersive nature of diesel particulate matter (DPM) and the fact that construction activities would occur intermittently and at various locations over the lifetime of the proposed CPU, construction activities under the proposed CPU are not anticipated to expose sensitive receptors to substantial DPM concentrations, and would not result in a cumulative health risk impact.

Stationary Sources

As discussed under Impact 4.1-3, the San Diego Air Pollution Control District would require an emissions inventory and health risk assessment in accordance with Assembly Bill 2588 prior to issuance of any permits to construct or operate a stationary emissions source. These requirements would extend to land uses within the CPU area in addition to land uses within the SDAB as a whole. Thus, existing laws are in place that require the evaluation and reduction of risks for individual projects developed in accordance with applicable land use plans. A site-specific evaluation of health risks associated with stationary sources cannot be conducted at this program level of review, as the proposed CPU does not include specific development proposals. Nevertheless, existing regulations would ensure that cumulative impacts associated with stationary emissions sources would be less than significant.

Mobile Sources

The evaluation of mobile sources in Section 4.1 of this PEIR is a cumulative analysis by nature as it considers the mobile emissions associated with buildout of the CPU area and associated vehicle emissions that could affect land uses in proximity to freeways. Consistent with California Air Resources Board recommendations, the proposed CPU incorporates appropriate policies to ensure future projects consider air quality in project designs. For example, the proposed CPU includes policies for development adjacent to freeways to provide land use buffers such as off-street parking and landscaping between buildings and freeways, orienting buildings adjacent to freeways such that courtyards and residential units with operable windows and balconies face away from the freeway, and locating residential units above freeway elevations. Thus, cumulative impacts related to the exposure of sensitive receptors to mobile source emissions would be less than significant.

Odors

For purposes of this issue, odor impacts, the cumulative study area would be the CPU area. Odors are typically confined to the immediate area surrounding their source and individual odor sources would not combine to produce a cumulative impact. Additionally, the proposed CPU does not include land uses that are associated with the generation of substantial odors. Thus, cumulative odor impacts would be less than significant.

5.1.2 BIOLOGICAL RESOURCES

Preservation of the region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City are managed through the City's Multiple Species Conservation Plan (MSCP) Subarea Plan, which is incorporated by reference in the City's General Plan.

The CPU area currently supports a number of sensitive biological resources including coastal sage scrub, chaparral, wetlands, and sensitive plants and wildlife. Surrounding communities such as North Park, Old Town, and Linda Vista contain similar resources that are primarily limited to canyon areas. However, these resources are protected through open space designations and/or their location within the City's Multi-Habitat Planning Area (MHPA), in addition to protections provided by the City's Environmentally Sensitive Lands (ESL) Regulations. Future development

projects with the potential to impact sensitive biological resources would be located within the Hillside Conservation, Design, and Height Limitation Community Plan Implementation Overlay Zone (CPIOZ) or the San Diego River CPIOZ. Future development projects in these areas are required to comply with the development standards and/or criteria under the applicable CPIOZ. Adherence to these development regulations would lessen potential impacts to sensitive biological resources. The Community Plans of surrounding communities (Uptown, Linda Vista, Old Town, North Park, Normal Heights, Serra Mesa, Tierrasanta, Kensington-Talmadge, and Navajo) also incorporate policies related to the protection of biological resources, focusing primarily on each Community Plan's consistency with the City's ESL Regulations, Biology Guidelines, and MSCP Subarea Plan's Management Policies to protect the area's sensitive plants and animals.

Cumulative development that would occur within the CPU area and in the surrounding communities would result in less than significant cumulative impacts to biological resources due to the developed nature of these communities combined with the existing regulatory framework that would ensure that impacts to sensitive biological resources are avoided. Although individual future projects could contribute to incremental biological resource impacts, compliance with applicable CPIOZ regulations, proposed CPU policies, and the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines would ensure that cumulative impacts from future development would be less than significant.

5.1.3 GEOLOGY, SOILS, AND SEISMICITY

Cumulative impacts related to geologic hazards within the CPU area and surrounding Community Planning Areas would be less than significant with implementation of recommendations included in site-specific geotechnical investigations required under the California Building Code (CBC) and San Diego Municipal Code (SDMC), as discussed in Section 4.3. As discussed, geologic hazards occur from mapped faulting and site-specific soil or geologic conditions.

Development of the proposed CPU in combination with surrounding Community Planning Areas would not compound or worsen potential geologic hazards. Geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere in the county. Thus, as each individual development would be required to comply with remedial measures identified in a site-specific geotechnical investigation, as required by the SDMC and CBC, cumulative impacts related to geologic hazards would be less than significant.

5.1.4 GREENHOUSE GAS EMISSIONS AND ENERGY

The analysis under Impact 4.4-1 is a cumulative analysis by nature because greenhouse gas (GHG) emissions are a cumulative issue caused by global GHG emissions, not individual projects. Cumulatively, there exists a significant impact related to GHG emissions at the global level. However, as discussed under Impact 4.4-1, the proposed CPU's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable. As discussed under Impact 4.4-2, City policies, plans, and codes will be continually evaluated as needed to ensure that Climate Action Plan (CAP) GHG emissions reduction targets are met. If implementation of the proposed CPU, cumulatively with other planning efforts, would be inconsistent with the CAP or other plans/policies that work to reduce GHG emissions, the City could amend those land use plans

to include more aggressive strategies for GHG reduction. Thus, cumulative impacts related to conflicts with GHG plans and policies would be less than significant.

Future development within the CPU area and planned growth in the City would require additional energy demand. However, as new development and redevelopment occurs, buildings will be required to comply with the California Energy Code, Title 24 requirements in place at the time of building permit issuance. Each update to the Energy Code has historically incorporated more stringent energy efficiency requirements, and the state is headed towards a net-zero energy goal for new development. Thus, as redevelopment occurs, older, less energy efficient buildings will be replaced with more energy efficient buildings that meet current energy efficiency standards. Furthermore, the City's CAP includes additional energy efficiency requirements that would be required of future discretionary developments, and all development is required to comply with Title 24 requirements. Policies within the proposed CPU are supportive of the General Plan City of Villages strategy, which intends to focus development intensity near transit and supports development of increased multi-modal transportation options. Other planning efforts in the City would similarly be required to be consistent with the City's overall framework for growth, which includes reducing vehicle miles traveled (VMT) and supporting sustainable energy-efficient development. Therefore, cumulative impacts related to energy consumption would be less than significant.

5.1.5 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Section 4.5, compliance with federal, State, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfires, hazardous substances, emergency response and evacuation plans, and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the CPU area and the surrounding communities (Uptown, Linda Vista, Old Town, North Park, Normal Heights, Serra Mesa, Tierrasanta, Kensington-Talmadge, and Navajo). Wildfire impacts on the urbanized CPU area would be limited as future projects implemented under the proposed CPU will be required to follow the City's Brush Management regulations, the City's Fire Code requirements, Statewide regulations. Additionally, the proposed CPU includes policies that support the management of vegetation and minimization of hazards. Similarly, potential hazards associated with hazardous material sites are site specific and would not combine with hazards in other Community Planning Areas to create a cumulative impact. Therefore, implementation of the proposed CPU would not result in a cumulatively significant impact related to hazards and hazardous materials.

5.1.6 HISTORICAL, CULTURAL, AND TRIBAL CULTURAL RESOURCES

As discussed in Section 4.6, while the proposed CPU could result in direct impacts to historical resources, the goals, policies, and recommendations enacted by the City, combined with federal, State, and local regulations, provide a framework for developing project-level historical resources mitigation measures for future discretionary projects. All future discretionary project submitted under the proposed CPU shall be subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines. The City's process for evaluating discretionary projects includes environmental review and documentation pursuant to

CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. As individual future projects may contribute to incremental historical resource impacts, and the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the cumulative impact on historical resources would be considered significant.

The General Plan PEIR states that the continued pressure to develop or redevelop areas in the county would result in incremental impacts to the historic record in the San Diego region, which was determined to be a cumulatively significant impact. Regardless of the efforts taken to avoid impacts to cultural resources, the more land that is converted to developed uses, the greater the potential for impacts to cultural resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore could result in a cumulatively significant impact.

As stated in Section 4.6, impacts to archaeological resources, sacred sites, human remains, and tribal cultural resources would be considered significant with the implementation of the proposed CPU. While federal, State, and local regulations, as well as goals and policies developed by the City would reduce impacts to these resources, future development in the CPU area could still result in significant impacts. Impacts to archaeological and tribal cultural resources from future development projects, in conjunction with impacts from development in surrounding Community Plan areas, could result in a significant cumulative impact to these resources. Implementation of the mitigation measures discussed in Section 4.6 could minimize the impacts of development under the proposed CPU, but cumulative impacts to archaeological resources, sacred sites, human remains, and tribal cultural resources would remain significant.

5.1.7 HYDROLOGY AND WATER QUALITY

Future projects within the CPU area and surrounding Community Planning Areas could have a cumulative impact on hydrology and water quality, including downstream problems associated with flooding, sizing of drainage facilities, erosion, and sedimentation. However, all future development within the City and surrounding Community Planning Areas would be required to comply with all National Pollutant Discharge Elimination System (NPDES) permit requirements, including the development of a storm water pollution prevention plan (SWPPP) if the disturbed area covers one acre or more, or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design, and BMPs for treatment. Improvements along the San Diego River will occur in the future as development projects are implemented. Future improvements to the river corridor may have the effect of changing the floodway or floodplain; however, all developments and improvements will be required to comply with City and the Federal Emergency Management Agency (FEMA) standards to ensure protection of hydrology and water quality and avoidance of flood hazards. In the existing condition, there is a cumulative flooding impact within the CPU area due to the volume of water entering rivers during major storm events, combined with the level of development within the CPU area. However, as future development would be required to adhere to the aforementioned standards to ensure runoff and flooding impacts are minimized, buildout of the proposed CPU would not make a cumulatively considerable contribution to the existing

cumulative impact associated with flooding. Thus, cumulative water quality, runoff, and flooding impacts would be less than significant.

5.1.8 LAND USE

As discussed in Section 4.8, the proposed CPU contains goals and policies that are consistent with citywide zoning classifications, development design guidelines, mobility guidelines, and programs in accordance with the goals of the General Plan and the regulations in the SDMC. The proposed CPU would accommodate existing development as well as encourage development consistent with community goals and character.

The proposed CPU is consistent with and would also implement the environmental goals and objectives of the San Diego Association of Government's (SANDAG's) Regional Plan. The proposed CPU's land use framework is consistent with the City's MSCP Subarea Plan and the MHPA Land Use Adjacency Guidelines and would accommodate the development proposed in the CPU area's Specific Plans. Development implemented in accordance with the proposed CPU would not result in conflicts with the City's ESL Regulations, as the proposed CPU contains policies that support these regulations. Any development within the CPU area that would encroach into environmentally sensitive lands would be subject to review in accordance with the ESL Regulations (SDMC Section 143.0101 et seq.). Future development would also be required to comply with the City's Historical Resources Regulations, which protect designated and eligible historical resources throughout the City. Future development projects within the Airport Influence Areas for San Diego International Airport (SDIA) or Montgomery Field would be submitted to the San Diego County Regional Airport Authority, acting as the Airport Land Use Commission (ALUC), to ensure the consistency of future development with the Airport Land Use Compatibility Plan (ALUCP) for the relevant airport, until the ALUC determines that the updated community plan and development regulations are consistent with the relevant ALUCPs, or the City Council takes action to overrule the ALUC. Based on the compatibility of the proposed CPU with the General Plan policy framework and other applicable regulations and land use plans, cumulative land use impacts would be less than significant.

5.1.9 NOISE

The analysis provided in Section 4.9 for each issue area is cumulative in nature, because the analysis considers noise and vibration impacts associated with buildout of the entire CPU area, and the traffic assumptions used in the analysis include cumulative traffic associated with the buildout of neighboring communities. Noise impacts associated with growth in neighboring communities would be localized in nature. For example, construction of restaurants or commercial uses in Linda Vista would not affect residences in the CPU area with the exception of development that may occur at the boundary of the CPU area. However, land uses within the CPU area would be subject to the same General Plan policies, noise ordinance requirements, and Title 24 standards discussed in this PEIR. Thus, cumulative noise impacts associated with stationary noise would be less than significant, and cumulative impacts associated with ambient noise increases and land use compatibility would be significant and unavoidable as discussed in the analysis in Section 4.9.

5.1.10 PALEONTOLOGICAL RESOURCES

Development under the proposed CPU could involve excavation of previously undeveloped areas, some of which may consist of unique paleontological resources with fossil-bearing potential. Potential cumulative impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the county as the county continues to develop in response to projected population growth. Likewise, development of the CPU area may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring. This regulation would apply to projects within and outside of the proposed CPU, and thus, cumulative impacts would be less than significant.

5.1.11 PUBLIC SERVICES AND FACILITIES

Population growth in the CPU area and in the surrounding Community Plan areas would result in increased demand for public services and facilities. Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth. As discussed in Section 4.11, implementation of the proposed CPU would include construction of a satellite police station on the former Stadium site, collocation of a new Fire-Rescue station just outside of the CPU area with the existing San Diego Police Department facility at that site, and new parks, and recreation facilities, and ~~the planned Civita Elementary School~~ schools. Construction of these proposed facilities would be subject to environmental review pursuant to CEQA at the time of facility design and approval. Additionally, the specific public services and facilities improvements that would be constructed in the cumulative area of the CPU are and adjacent Community Plan areas and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. Therefore, cumulative impacts related to public services are considered significant and unavoidable.

5.1.12 PUBLIC UTILITIES AND INFRASTRUCTURE

Water Supply

The Water Supply Assessment (WSA) prepared for the proposed CPU concluded that the proposed CPU would be consistent with the water demand assumptions included in the regional water resource planning documents of the San Diego County Water Authority (SDCWA) and the Metropolitan Water District (MWD). Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the City's Public Utilities Department (PUD), the SDCWA, and MWD to serve the projected demands of the CPU area, in addition to existing and planned future water demand of the City. Thus, cumulative impacts related to water supply would be less than significant.

Utilities

Some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve additional population. However, the specific utilities improvements that would be constructed in the cumulative area of the CPU area and adjacent Community Plan areas, the degree of future impacts, and the applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. Therefore, cumulative impacts related to utilities are considered significant and unavoidable.

Solid Waste and Recycling

The proposed CPU would generate solid waste through demolition/construction activities and ongoing operations that would increase the amount of solid waste generated within the region. Future projects within the CPU area would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with the SDMC and consistency with General Plan policies promoting waste diversion would help preserve the City's solid waste capacity. Discretionary projects of 40,000 square feet or more generating more than 60 tons of waste would be required to develop and implement waste management plans, targeting 75 percent waste diversion. Therefore, cumulative solid waste impacts would be less than significant.

5.1.13 TRANSPORTATION

Due to the long-range planning nature of the project being an update to the adopted Community Plan with no specific development project being proposed at this time, the transportation and circulation analysis provided in Section 4.13 of this PEIR is considered cumulative in nature. Thus, as discussed in Section 4.13, impacts to roadway segments, intersections, freeway segments, and freeway ramp meters under the proposed CPU would result in a significant cumulative impact. See Section 4.13 for mitigation and significance conclusions.

5.1.14 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Future growth within the CPU area has the potential to cumulatively impact the visual environment through the design and location of future buildings. Changes in visual effects and neighborhood character from individual development projects within the CPU area could contribute incrementally to cumulative impacts with regard to aesthetics. However, this would not result in a cumulatively significant impact since the CPU area is already urbanized and includes existing development of the type that would be further developed under the proposed CPU. Development under the proposed CPU that could potentially impact existing views within the River Corridor Area, and area south of I-8, would be restricted under proposed policies that limit development and building heights, and create open public view corridors.

Future development in the CPU area and surrounding communities is likely to take place on infill sites in previously developed locations. The proposed CPU contains policies to ensure that any new development is consistent with the existing character and protects public views. The proposed policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as canyons and hillsides. The proposed CPU contains policies to preserve,

protect, and restore existing landforms. Compliance with the SDMC would ensure that cumulative light and glare impacts are avoided. Based on the existing urbanized character of the CPU area and implementation of existing regulations and policies in the proposed CPU, cumulative impacts would be less than significant.

5.2 Growth-Inducing Impacts

The CEQA Guidelines require that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines Section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

According to the City’s CEQA Significance Determination Thresholds, growth inducement “is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly, which may result in the construction of major new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment.” In addition, the Thresholds state that “the analysis must avoid speculation and focus on probable growth patterns or projects.”

The General Plan PEIR notes that “population in San Diego will grow whether or not the Draft General Plan is adopted...” and a number of the General Plan policies are in place to “...encourage business, education, employment and workforce development...preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses...and facilitate expansion and new growth of high quality employment opportunities in the City.” The General Plan incorporates the previously adopted City of Villages strategy, which notes that a “village” is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact mixed-use areas that are pedestrian-friendly and linked to the regional transit system (City of San Diego, 2008b). Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. Implementation of the City of Villages strategy relies on the future designation and development of village sites through comprehensive community plan updates.

The proposed CPU serves as a comprehensive long-term plan for the physical development of the CPU area and is intended to manage and address future growth of the community through 2050.

The proposed CPU would be consistent with and implement the General Plan’s City of Villages Strategy as it would place an emphasis on directing population growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. Multiple policies in the proposed CPU promote mixed uses and walkability along corridors by requiring or encouraging ground floor commercial spaces, and by detailing street-level design elements that activate storefronts and create an attractive public realm. The proposed CPU includes policies that promote pedestrian-oriented development along appropriate streets through building diversity and active frontages. Additional policies and implementing actions contained in the proposed CPU

support transit-oriented development, such as parking reductions, Transit Demand Management planning, and unbundled parking. The proposed CPU also embraces the City of Villages commitment to environmental justice, by including policies and mitigation that embrace compatible industrial and residential uses, and promote equal access to healthy food, parks and green spaces, and health care and social services.

The proposed CPU is intended to provide guidance on orderly growth and redevelopment in accordance with smart growth principles. Through the placement of higher density residential development in areas in and around transit and commercial corridors, the proposed CPU would foster a mixed-use urban environment that supports transit and pedestrian activity. The proposed CPU would designate land uses to accommodate residential and non-residential growth, although additional housing units and non-residential space would not be built without demand. Other potential environmental impacts associated with population growth in the CPU area (e.g., transportation/traffic, air quality, noise, GHG emissions) are addressed in the relevant sections of this PEIR.

The proposed CPU promotes infill residential, commercial, and office development in proximity to transit services and residential uses, and encourages the use of local and State programs to incentivize business retention and expansion. Additional proposed policies are intended to facilitate the economic well-being of locally owned and operated businesses, and create ample job opportunities for residents in the CPU area. These policies would serve to facilitate expansion and new growth of high-quality employment opportunities with bicycle or pedestrian access to transit. Therefore, the proposed CPU would provide comprehensive planning for the management of population growth, necessary economic expansion to support development efforts, and allow an appropriate balance of managed population, housing, and economic growth to accommodate community development while maintaining related community and environmental standards.

5.3 Significant and Unavoidable Impacts

In accordance with CEQA Guidelines 15126.2(b), an EIR must discuss any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to be low a level of significance. Chapter 4 identifies significant unavoidable impacts related to air quality (conflicts with air quality plans, and air quality standards); historical, cultural, and tribal cultural resources (historic structures, objects, or sites; prehistoric and historic archaeological resources, scared sites, and human remains; and tribal cultural resources); hydrology and water quality (flooding and drainage patterns – riverine flooding); noise (increase in ambient noise; land use compatibility; and San Diego Municipal Code - construction noise); public services and facilities (public facilities); public utilities and infrastructure (utilities); and transportation (traffic circulation). All other significant impacts identified in Chapter 4 can be reduced to below a level of significance with implementation of the mitigation framework identified, and through compliance with General Plan and proposed CPU policies.

5.4 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of the significant irreversible environmental changes which would occur should the project be implemented. Irreversible changes typically fall into one of three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Primary and secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with future development under the project.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the proposed CPU would not result in significant irreversible impacts to agricultural land, biological habitat, mineral deposits, water bodies, or land use. Although sensitive biological resources are identified within the CPU area, direct and indirect impacts can be offset through strict compliance with CPU policies and regulatory compliance (i.e. the MHPA Land Use Adjacency Guidelines and the ESL Regulations). Similarly, as discussed in Section 4.7, future development in the CPU area would be required to demonstrate how pollutants would be treated to prevent discharge into receiving waters (i.e. the Lower San Diego River and the Pacific Ocean Shoreline). As discussed in Section 5.5: Impacts Found Not to be Significant, implementation of the proposed CPU would not impact agricultural, forestry, or mineral resources. The CPU area is almost completely built out and is accessible via regional transportation facilities. No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Pedestrian bridges and walkways are proposed to increase accessibility and connectivity, but these areas are not currently inaccessible. Therefore, implementation of the proposed CPU would not result in a significant irreversible commitment with regards to unplanned land use.

Future development pursuant to the proposed CPU could impact important historical, tribal cultural, or archaeological resources given the presence of known and potential resources within the CPU area. Potential impacts to historical, tribal cultural, or archaeological resources can be mitigated through strict adherence to proposed CPU policies, regulatory compliance (i.e. the City's Historical Resource Regulations), and implementation of the mitigation framework described in Section 4.6. However, impacts to historical, tribal cultural, and archaeological resources would remain significant and unavoidable.

Construction activities associated with the proposed CPU would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while recyclable in part at some long-term future date, would for practical

purposes be considered permanently consumed. Energy derived from nonrenewable sources, such as fossil fuels, would be consumed during construction and from operational lighting, heating, cooling, and equipment and transportation uses. However, technological improvements in automobiles, including the growth of the electric vehicle market share, has the potential to reduce fossil fuel consumption. The proposed CPU includes policies aimed at improving energy efficiency, reducing water use, minimizing impacts on other natural resources, and encouraging renewable energy generation as discussed in Section 4.4: Greenhouse Gas Emissions and Energy. Additionally, the State of California continues to set aggressive vehicle efficiency and renewable energy targets, including sourcing all electricity from zero-carbon sources by 2045. As regulations become more stringent over time, energy use associated with the proposed CPU could decrease.

With respect to environmental accidents, and as further discussed in Section 4.5, potential impacts related to hazardous materials and associated health hazards from implementation of the proposed CPU would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes. The majority of the CPU area is mapped as having a Moderate fire threat, with areas of High fire threat and Very High fire threat present in the southeastern and southern edge of the CPU area. However, future development would be subject to applicable State and City regulations related to fire hazards and prevention, and the proposed CPU contains policies aimed at reducing the availability of fuels to limit the spread of wildfire. The CPU area contains a minimal amount of undeveloped land along the San Diego River. Accidents related to flood hazards would not be significant because all development would be subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual.

5.5 Impacts Found Not to Be Significant

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore were not discussed in detail in the EIR. Impacts associated with Agriculture and Forestry Resources, Mineral Resources, and Population and Housing were found not to be significant.

5.5.1 AGRICULTURE AND FORESTRY RESOURCES

Farmland Mapping and Monitoring Program

Based on farmland mapping prepared by the California Department of Conservation Farmland Mapping and Monitoring Program (2017), the CPU area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The CPU area is classified entirely as urban and built-up land. Therefore, there would be no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Agricultural Zoning/Williamson Act

The CPU area is not zoned for agriculture and there are no lands under a Williamson Act contract. No impact is identified for this issue area.

Forest, Timberland, Timberland Production Zone

The CPU area is located within an urbanized area. There are no existing forestlands, timberlands, or timberlands zoned for Timberland Production Zone either within the CPU area or in the immediate vicinity that would conflict with existing zoning or the proposed rezoning. Therefore, no impact is identified for this issue area.

Loss of Forest Land

The CPU area is located within an urbanized area. There are no existing forestlands either within the CPU area or in the immediate vicinity. Implementation of the proposed CPU would not result in the loss of forestland or conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

Natural Conversion of Farmland or Forest

The CPU area is located within an urbanized area; there are no existing forestland uses either on-site or in the immediate vicinity. Implementation of the proposed CPU would not involve any other changes that could result in the conversion of farmland to non-agricultural use or the conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

5.5.2 MINERAL RESOURCES

According to the California Geological Survey Special Report 240, areas classified as Mineral Resource Zone 1, 2, 3, and 4 (MRZ-1 through MRZ-4) have been mapped for the City of San Diego. These categories are described as follows:

- **MRZ-1.** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2.** Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or areas where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.
- **MRZ-3.** Areas containing mineral occurrences of undetermined mineral resource significance.
- **MRZ-4.** Areas where available information is inadequate for assignment to any other MRZ category.

The CPU area is classified as MRZ-1, MRZ-2, and MRZ-3 (California Geologic Survey, 2017). The CPU area is located entirely within a developed urban area and does not require the acquisition of additional land. Implementation of the proposed CPU would not affect or result in the loss of identified mineral resources, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on any local or general plan. Therefore, no impact to mineral resources would occur.

5.5.3 POPULATION AND HOUSING

While population projections for the CPU area indicate that the population will increase over time under the proposed CPU, population growth would not introduce an impact. The proposed CPU serves as a comprehensive, long-term plan for the physical development of the Mission Valley community and is intended to manage and address future growth in the community to support transit use and multi-modal mobility. The proposed CPU would not displace people or existing housing, as the project would designate planned land uses and zoning that would accommodate future development within the CPU area. Therefore, no impact to population and housing would occur.

6 Alternatives Analysis

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the proposed CPU. According to the CEQA Guidelines, the range of alternatives “shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts” (CEQA Guidelines Section 15126.6 (d) (2)). The discussion must also include an evaluation of the No Project Alternative to allow decision-makers to compare the impacts of approving the Proposed Project against the impacts of not approving it.

The alternatives discussion need not be exhaustive and is subject to a construction of reasonableness. The impacts of the alternatives may be discussed “in less detail than the significant effects of the project proposed” (CEQA Guidelines Section 15126.6 (d)). The CEQA Guidelines do not specify what constitutes an adequate level of detail, though an EIR must provide sufficient information to allow meaningful evaluation, analysis, and comparison of each alternative. The CEQA Guidelines require that this analysis identify the environmentally superior alternative among those analyzed.

6.1 Background on Development of Alternatives

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which each alternative would feasibly accomplish most or all of the basic objectives of the proposed CPU;
- The extent to which each alternative would avoid or substantially lessen any of the identified significant environmental impacts of the project;
- The feasibility of each alternative, taking into account site suitability, economic viability, availability of infrastructure, General Plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of each alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

The following specific objectives for the project support the underlying purpose of the project, assisted the City as the lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary.

- Establish a sustainable, walkable community with enriched pedestrian spaces including linear parks and nodes of pedestrian-scaled, visually stimulating development that support a mix of uses;
- Establish a strengthened grid system that supports local and regional roadway network efficiency, with a finer grain of streets that provide a second layer of neighborhood mobility more suitable to pedestrian and daily community trips;
- Accommodate new roadway connections within developed areas or areas planned for development for improved connectivity and adequate emergency access and response;
- Provide housing and employment opportunities in close proximity to transit;
- Meet the City's Climate Action Plan goals;
- Create a branching park and pedestrian pathway system with the San Diego River as the backbone and organizing framework;
- Establish usable public spaces that provide amenities for recreation and relaxation for community enjoyment;
- Encourage architecture that is distinctive and memorable, with attention paid to building quality, materials, details, and amenities that give back to the community; and
- Enhance and maintain the hillsides that form the edges of the valley.

The August 2018 Draft Mission Valley CPU proposed the extension of Via Las Cumbres as a four-lane Major street from Friars Road on the north to Hotel Circle South on the south, connecting with a one-way couplet proposed for Hotel Circle North and Hotel Circle South. The extension of Via Las Cumbres over the San Diego River was intended to improve connectivity and public safety for the community by providing a new north-south connection, as well as a high-water crossing during flooding events. However, it was determined that the Via Las Cumbres extension would result in significant impacts associated with biological resources, land use, noise, and visual effects and neighborhood character. The extension would have been constructed as an elevated roadway over the MTS trolley track to provide adequate clearance for the trolley and associated infrastructure. Due to grade constraints, the presence of the San Diego River, and the intent to connect over I-8, the connecting bridge would have been required to stay elevated through the entirety of its length, approximately 2,000 feet.

To continue to provide an additional north-south high-water crossing for the community, while reducing or eliminating the significant environmental impacts that would occur with a Via Las Cumbres extension, an alternative roadway crossing is proposed as part of the proposed CPU. Under the proposed CPU analyzed in this PEIR, Street "J" would provide the north-south connection as a two- to four-lane major roadway with buffered bicycle lanes and a painted median approximately 900 feet east of the original potential Via Las Cumbres extension, still connecting from Friars Road on the north to Hotel Circle South on the south. Like the potential Via Las

Cumbres extension, Street “J” would require a bridge over the San Diego River, constructed at an elevation of at least two feet above the floodplain to allow for the 100-year flood event. In contrast to the Via Las Cumbres extension, Street “J” would provide a single lane of travel in each direction, in some locations, instead of two lanes of travel in each direction, and would be shorter in length by approximately 1,800 feet. Additionally, this connection would not need to be elevated over the MTS mitigation site and would appear to cross the valley closer to ground level, similar to other bridge crossings of the San Diego River within Mission Valley. Incorporation of Street “J” into the proposed CPU is intended to reduce the visual impact of the roadway width, promote a more pedestrian-oriented experience, and minimize shading of the San Diego River from the bridge crossing, therefore resulting in fewer impacts than those that would result from a Via Las Cumbres extension. Street “J” would achieve the same project objectives as a Via Las Cumbres extension with fewer environmental impacts. Thus, the Via Las Cumbres extension is an alternative that was considered but rejected as infeasible.

As discussed in Sections 4.1 through 4.14 and Chapter 5, the proposed CPU would result in significant and unavoidable impacts related to the following topic areas:

- Air Quality
- Historical, Cultural, and Tribal Cultural Resources
- Hydrology and Water Quality
- Noise
- Public Services and Facilities
- Public Utilities and Infrastructure
- Transportation

This section identifies and analyzes a No Project Alternative and two additional alternatives in comparison to the potential environmental impacts associated with the Proposed CPU. The No Project Alternative is the continuation of the current Mission Valley Community Plan. The land use diagram for the No Project Alternative is depicted in Figure 6.1-1. The roadway network for the No Project Alternative is depicted in Figure 6.1-2.

Alternative 1 differs from the proposed CPU in that it would not include the Fenton Parkway roadway extension or the proposed Street “J” connection over the San Diego River. The roadway network for Alternative 1 is shown in Figure 6.1-3.

Alternative 2 differs from the proposed CPU in the proposed configuration of the proposed high-water crossing roadway connection from Friars Road to Hotel Circle South. The proposed CPU provides the connection via Street “J” and Alternative 2 provides a two-lane connection via an extension of Via Las Cumbres. The roadway network for Alternative 2 is shown in Figure 6.1-4.

Alternatives 1 and 2 would include all other policies, land use designations, and mobility improvements included in the proposed CPU. The two alternatives identified aim to support the basic objectives of the proposed CPU, while showing varying approaches to the circulation network. Each major issue area included in the detailed impact analysis of this PEIR has been given

consideration in the alternatives analysis. Table 6.1-1, Summary of Impacts for the Proposed CPU and Alternatives, provides a side-by-side comparison of the potential impacts of the alternatives to the proposed CPU impacts. As required under CEQA Guidelines Section 15126.6 (e)(2), the PEIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. The environmentally superior alternative is discussed in Section 6.5, below.

Table 6.1-1: Summary of Impacts for the Proposed CPU and Alternatives

Impact	Level of Significance			
	Proposed CPU	No Project	Alternative 1	Alternative 2
<i>Air Quality</i>				
Conflict with Air Quality Plan	SU	LTS	SU	SU
Air Quality Standards	SU	LTS	SU	SU
Substantial Pollutant Concentrations	LTS	LTS	LTS	LTS
Odors	LTS	LTS	LTS	LTS
<i>Biological Resources</i>				
Sensitive Species	LTS	LTS	LTS	LTS
Sensitive Habitats	LTS	LTS	LTS	LTS
Wetlands	LTS	LTS	LTS	LTS
Wildlife Corridors and Nursery Sites	LTS	LTS	LTS	LTS
Multiple Species Conservation Program	LTS	LTS	LTS	LTS
<i>Geology, Soils, and Seismicity</i>				
Seismic Hazards	LTS	LTS	LTS	LTS
Erosion or Loss of Topsoil	LTS	LTS	LTS	LTS
Geologic Instability	LTS	LTS	LTS	LTS
Expansive Soils	LTS	LTS	LTS	LTS
<i>Greenhouse Gas Emissions and Energy</i>				
Greenhouse Gas Emissions	LTS	LTS	LTS	LTS
Conflicts with Plans or Policies	LTS	LTS	LTS	LTS
Energy Consumption	LTS	LTS	LTS	LTS
<i>Hazards and Hazardous Materials</i>				
Wildland Fire Risk	LTS	LTS	LTS	LTS
Hazardous Emissions and Materials	LTS	LTS	LTS	LTS
Emergency Plan Consistency	LTS	LTS	LTS	LTS
Hazardous Materials Sites	LTS	LTS	LTS	LTS
Aircraft Hazards	LTS	LTS	LTS	LTS
<i>Historical, Cultural, and Tribal Cultural Resources</i>				
Historic Structure, Object, or Sites	SU	SU	SU	SU

Table 6.1-1: Summary of Impacts for the Proposed CPU and Alternatives

<i>Impact</i>	<i>Level of Significance</i>			
	<i>Proposed CPU</i>	<i>No Project</i>	<i>Alternative 1</i>	<i>Alternative 2</i>
Prehistoric or Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	SU	SU	SU
Tribal Cultural Resources	SU	SU	SU	SU
<i>Hydrology and Water Quality</i>				
Flooding and Drainage Patterns	SU ¹	SU	SU	SU
Water Quality	LTS	LTS	LTS	LTS
Groundwater	LTS	LTS	LTS	LTS
<i>Land Use</i>				
Conflicts with Applicable Plans	LTS	LTS	LTS	LTS
Conversion of Open Space or Farmland	LTS	LTS	LTS	LTS
Conflicts with the MSCP Subarea Plan	LTS	LTS	LTS	LTS
Conflicts with an Adopted ALUCP	LTS	LTS	LTS	LTS
<i>Noise</i>				
Ambient Noise	SU	SU	SU	SU
Land Use Compatibility	SU	SU	SU	SU
Airport Noise	LTS	LTS	LTS	LTS
Noise Ordinance Compliance	LTS	LTS	LTS	LTS
Temporary Construction Noise	SU	SU	SU	SU
Vibration	LTS	LTS	LTS	LTS
<i>Paleontological Resources</i>				
Paleontological Resources	LTS	LTS	LTS	LTS
<i>Public Services and Facilities</i>				
Police Protection	SU	SU	SU	SU
Parks and Recreation	SU	SU	SU	SU
Fire/Life Safety Protection	SU	SU	SU	SU
Libraries	SU	SU	SU	SU
Schools	SU	SU	SU	SU
<i>Public Utilities and Infrastructure</i>				
Water Supply	LTS	LTS	LTS	LTS
Utilities	SU	SU	SU	SU
Solid Waste Management	LTS	LTS	LTS	LTS
<i>Transportation</i>				
Traffic Circulation	SU	SU	SU	SU
Alternative Transportation	LTS	LTS	SU	LTS

Table 6.1-1: Summary of Impacts for the Proposed CPU and Alternatives

Impact	Level of Significance			
	Proposed CPU	No Project	Alternative 1	Alternative 2
<i>Visual Effects and Neighborhood Character</i>				
Obstruction of Vistas or Scenic Views	LTS	LTS	LTS	LTS
Adverse Alternation to Character	LTS	LTS	LTS	LTS
Loss of Trees	LTS	LTS	LTS	LTS
Change in Existing Landform	LTS	LTS	LTS	LTS
Light or Glare	LTS	LTS	LTS	LTS

Notes:

LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and Unavoidable

- Impacts associated with Riverine Flooding would be significant and unavoidable. Impacts associated with Local Surface Runoff, Dam Failure, or Other Flood Hazards (Seiches, Tsunamis, or Mudflows) would be less than significant.

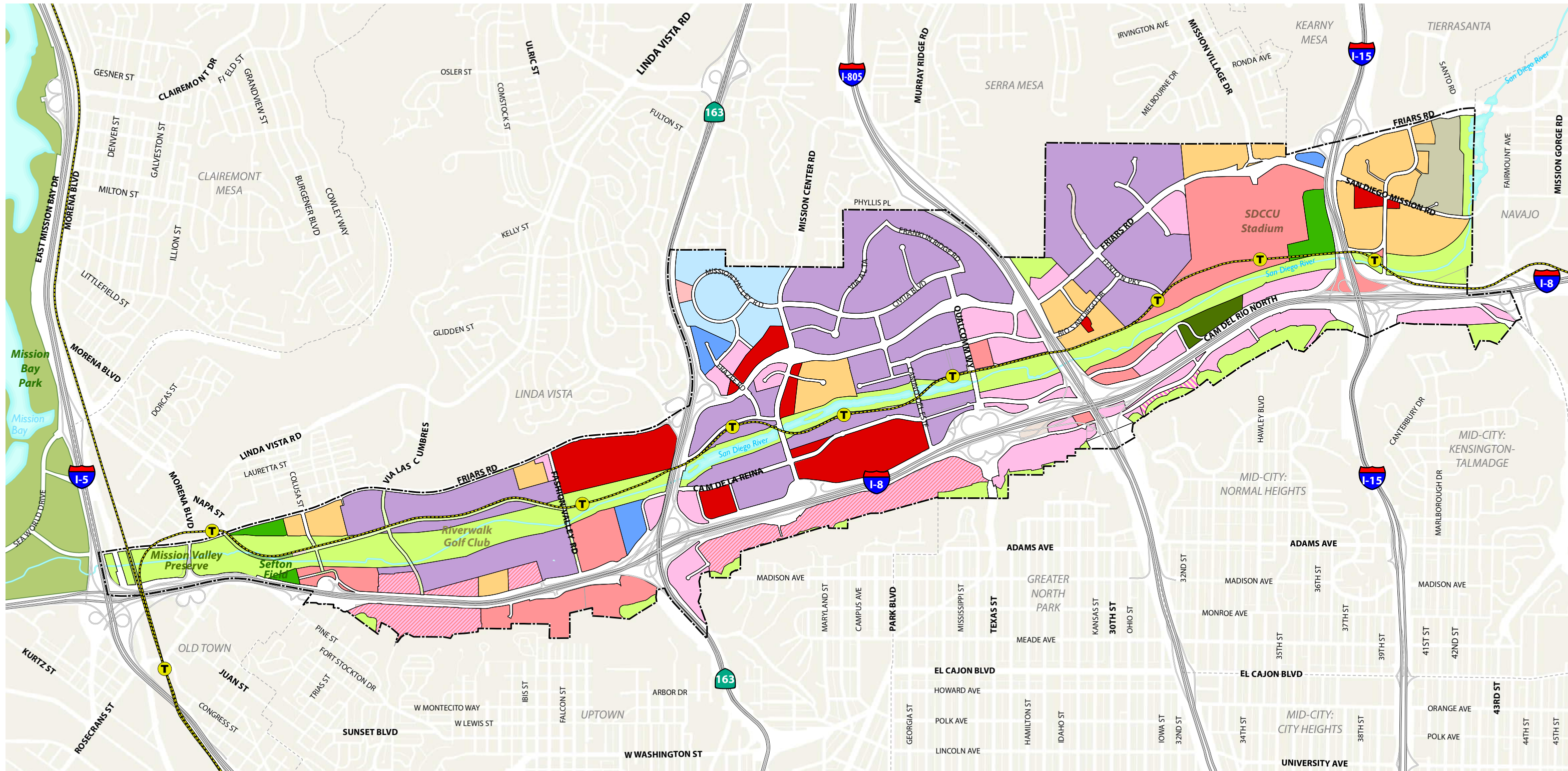
Source: Dyett & Bhatia, 2018.

Table 6.1-2: No Project Alternative and Proposed CPU Land Use Designation Comparison, provides a comparison of the future land uses under the No Project Alternative and the proposed CPU. Alternative 1 and Alternative 2 would have identical land use designations as the proposed CPU.

Table 6.1-2: No Project Alternative and Proposed CPU Land Use Designation Comparison

No Project Alternative	Proposed CPU
Residential	Residential-Low
	Residential-Medium
	Residential-High
Commercial Retail	Regional Retail
	Commercial
Commercial Recreation	
Commercial Visitor	Hotel
Commercial Office	Office
Business/Industrial	
Industrial Park	<u>Industrial – Light/Industrial - Heavy</u>
Multiple Use	Mixed Use-Medium
	Mixed Use-High
Mission and School	Public/Institutional
Open Space	Park and Open Space

Figure 6.1-1: No Project Alternative Land Use Diagram



Trolley Stops	Residential	Office or Commercial Recreation	Mission and School	Lakes/Ponds/Bays
Light Rail	Residential/Office Mix	Visitor Commercial	Open Space	Mission Valley Community Plan Boundary
Freeways	Commercial Retail	Multi-Use	Public Recreation	Community Planning Areas
Ramps	Commercial Office	Business / Industrial	Public Facility	
Streams/Creeks	Commercial Recreation	Industrial Park		

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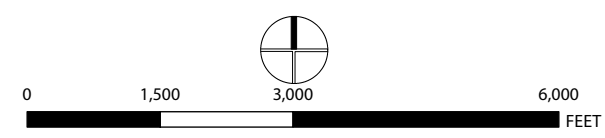
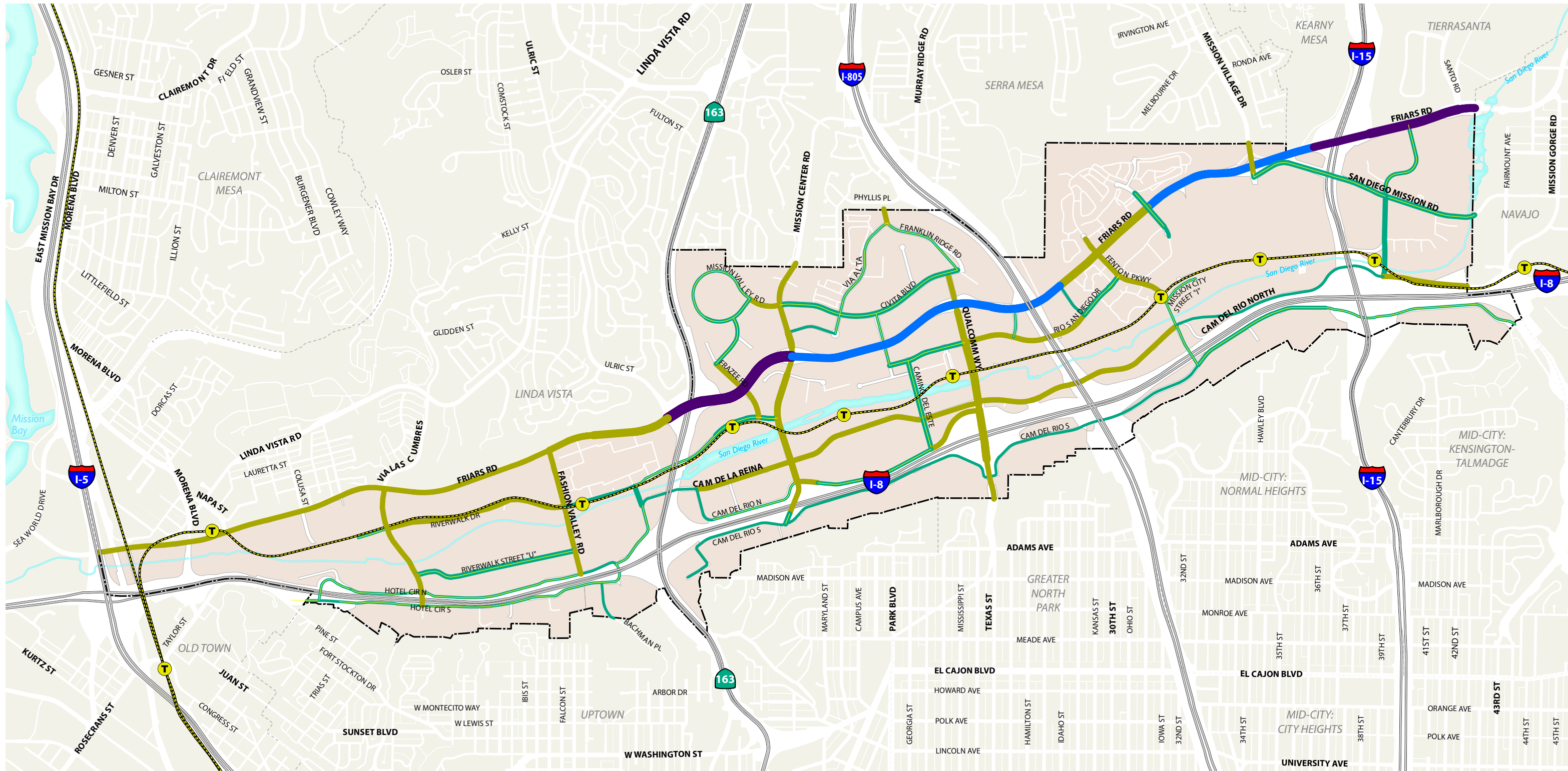


Figure 6.1-2: No Project Alternative Roadway Classifications



Trolley Stops	Proposed Plan Roadway Classifications	6-Ln Prime Arterial	4-Ln Collector	Lakes/Ponds
Light Rail	6-Ln Expressway	6-Ln Major Arterial	3-Ln Collector	Mission Valley Community Plan Boundary
Freeways	8-Ln Prime Arterial	5-Ln Major Arterial	2-Ln Collector	Community Planning Areas
Ramps	7-Ln Prime Arterial	4-Ln Major Arterial	Two-Way Left Turn Lane (on Collector roadways)	
Streams/Creeks				

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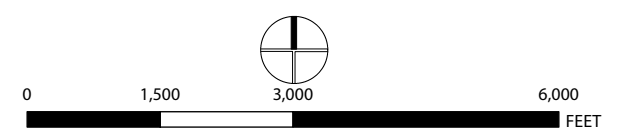
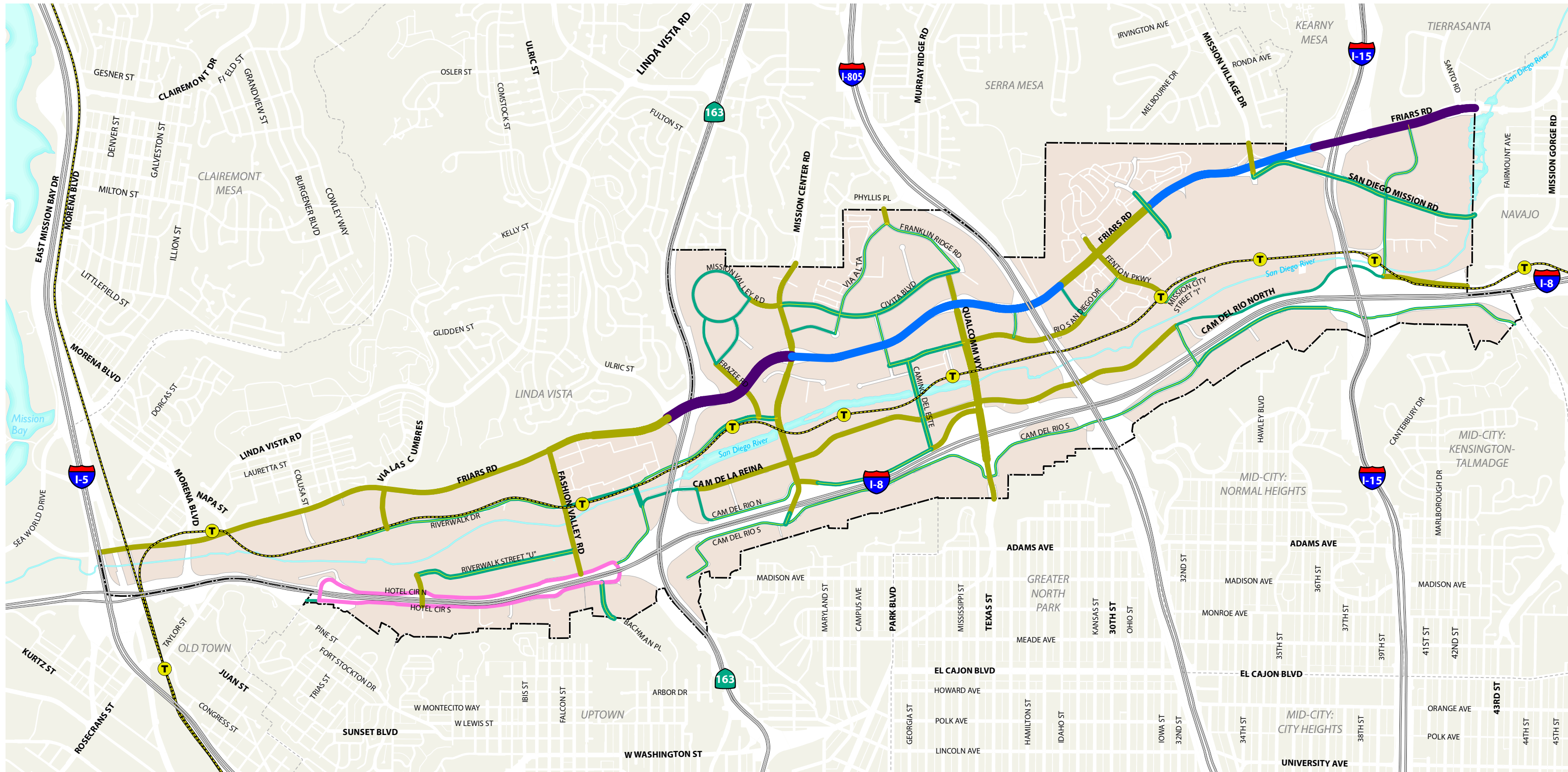


Figure 6.1-3: Alternative 1



Trolley Stops	Roadway Classifications	6-Ln Major Arterial	3-Ln Collector	Lakes/Ponds
Light Rail	6-Ln Expressway	5-Ln Major Arterial	2-Ln Collector	Mission Valley Community Plan Boundary
Freeways	8-Ln Prime Arterial	4-Ln Major Arterial	Two-Way Left Turn Lane (on Collector roadways)	Community Planning Areas
Ramps	7-Ln Prime Arterial	4-Ln Collector	2-Ln Collector (One-Way)	
Streams/Creeks	6-Ln Prime Arterial			

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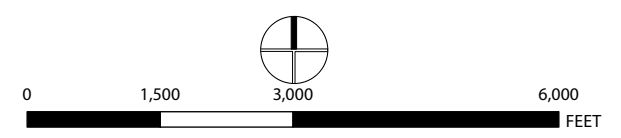
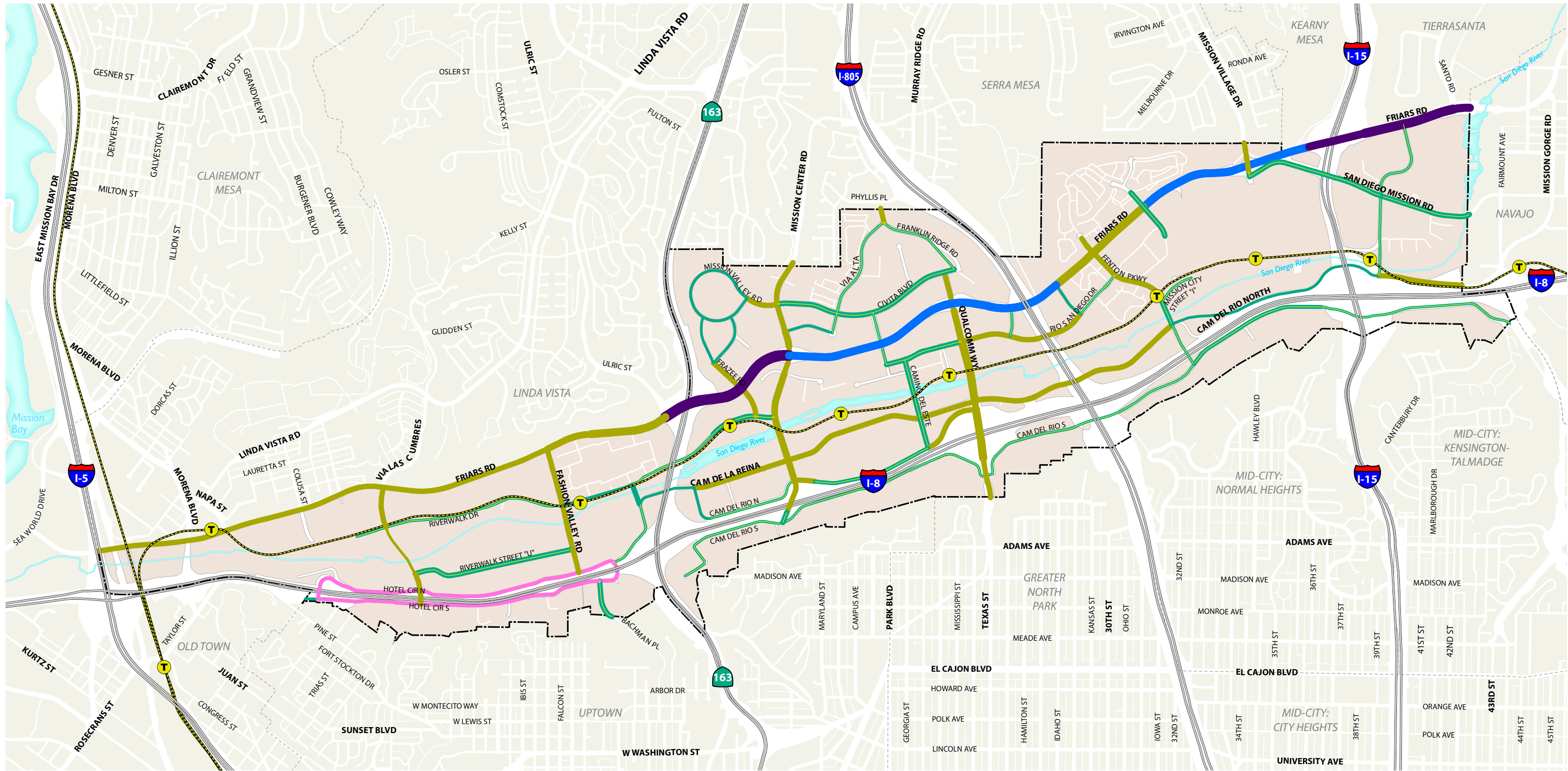


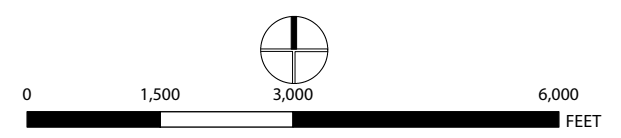
Figure 6.1-4: Alternative 2



Trolley Stops	Roadway Classifications	6-Ln Major Arterial	3-Ln Collector	Lakes/Ponds/Bays
Light Rail	6-Ln Expressway	5-Ln Major Arterial	2-Ln Collector	Mission Valley Community Plan Boundary
Freeways	8-Ln Prime Arterial	4-Ln Major Arterial	Two-Way Left Turn Lane (on Collector roadways)	Community Planning Areas
Ramps	7-Ln Prime Arterial	2-Ln Major Arterial	2-Ln Collector (One-Way)	
Streams/Creeks	6-Ln Prime Arterial	4-Ln Collector		

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6.2 No Project Alternative

6.2.1 DESCRIPTION

The purpose of evaluating the No Project Alternative is to allow decision-makers to compare the potential impacts of approving the proposed CPU with the potential impacts of not approving the proposed CPU. The No Project analysis represents what would be reasonably expected to occur in the foreseeable future if the proposed CPU were not approved. The No Project Alternative land use diagram is depicted in Figure 6.1-1. The No Project Alternative roadway network is shown in Figure 6.1-2.

Under the No Project Alternative, the existing Mission Valley Community Plan would continue to guide development. The plan includes goals and actions to improve the transportation system, relate development intensity to the capacity of the transportation system, encourage mixed-use development on large sites, guide urban form and physical development that protects and is responsive to the physical environment, and encourage the development of neighborhood facilities that fulfill the daily needs of local residents.

The No Project Alternative includes a different set of land use designations from the proposed CPU, as described in Table 6.1-2. Buildout for the No Project Alternative is shown in Table 6.2-1 compared to existing conditions and the proposed CPU.

Table 6.2-1: Buildout Summary

	Base Year (2012)	Proposed CPU		No Project Alternative		Net Proposed CPU Change from No Project Alternative
		Buildout (2050)	Net Increase from Base Year	Buildout (2050)	Net Increase from Base Year	
Housing Units	11,240	39,160	27,910	23,200	11,960	15,960
Single-Family	0	0	0	0	0	0
Multi-Family	11,240	39,160	27,910	23,200	11,960	15,960
Household Population	20,800	72,400	51,600	42,900	22,100	29,500
Non-Residential Square Feet	17,667,000	25,038,000	7,371,000	25,570,000	7,903,000	(532,000)
Commercial/ Retail	5,231,000	7,244,000	2,013,000	6,216,000	985,000	1,028,000
Office	7,419,000	12,087,000	4,669,000	11,788,000	4,370,000	299,000
Motel/Hotel	3,649,000	4,406,000	758,000	6,293,000	2,644,000	(1,887,000)
Industrial	603,000	121,000	(483,000)	529,000	(74,000)	(408,000)
Institutional/ Community Facilities	159,000	195,000	37,000	175,000	16,000	20,000
Hospital/Clinic	67,000	43,000	(24,000)	67,000	0	(24,000)
University and other colleges	248,000	189,000	(58,000)	223,000	(24,000)	(34,000)
Schools K to 12	96,000	106,000	9,000	96,000	0	10,000
Recreational	195,000	646,000	495,000	181,000	(14,000)	465,000
Employment	45,600	64,700	19,100	65,200	19,700	(500)

Note: Numbers may not sum due to rounding. Total and multi-family housing are rounded to the nearest 10; the single-family unit is not rounded. Duplexes and triplexes are counted as multi-family housing. Population and employment are rounded to the nearest 100. Non-residential square feet is rounded to the nearest 1,000.

Sources: Dyett & Bhatia, 2018; City of San Diego, 2018.

6.2.2 ANALYSIS

6.2.2.1 Air Quality

The No Project Alternative would retain the existing adopted land uses throughout the Mission Valley Community Plan area and would, therefore, not conflict with or obstruct implementation of the applicable air quality plan. Nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation, because the land uses under the existing community plan would be consistent with the adopted Regional Air Quality Strategy (RAQS). As detailed in Section 4.1, the proposed CPU would result in significant and unavoidable impacts associated with conflicts with air quality plans and standards. Thus, impacts related to conflicts with an applicable air quality plan or violation of an air quality standard associated with this alternative would be less compared to the proposed CPU. Additionally, because build-out under the No Project Alternative would be less dense than under the proposed CPU, impacts associated with exposure of sensitive receptors to pollutants would be less than the anticipated impacts of the proposed CPU. Odor impacts would be the same under both the No Project Alternative and the proposed project. The No Project Alternative would result in *less than significant* impacts associated with air quality plan conflicts, air quality standards, sensitive receptors, and odors and would avoid the significant and unavoidable impacts of the proposed CPU associated with air quality plan conflicts and air quality standards.

6.2.2.2 Biological Resources

Under the No Project Alternative, no changes to the existing land use designations throughout the CPU area would occur. Areas designated for growth and development are generally already developed and do not support significant biological resources. Development under both the proposed CPU and No Project Alternative would be subject to all applicable federal, State, and local regulations regarding the protection of biological resources, ensuring that biological resources are protected, preserved, or mitigated at appropriate ratios to maintain viable ecological communities. Thus, impacts to biological resources would result in *less than significant* impacts related to sensitive species, sensitive habitats, wetlands, wildlife corridors and nursery sites, and the City's Multiple Species Conservation Program (MSCP), the same as the proposed CPU.

6.2.2.3 Geology, Soils, and Seismicity

While seismic hazards are present in the planning area, compliance with State and local safety codes and ordinances would reduce the risk of loss, injury, or death from these hazards under the No Project Alternative to *less than significant*, similar to the proposed CPU. As with the proposed CPU, adherence to City-mandated grading requirements would ensure that impacts from the No Project Alternative related to the erosion of soil associated with future development would be *less than significant*, similar to the proposed CPU. Therefore, development under the No Project Alternative would have a *less than significant* impact related to landslide, lateral spreading, liquefaction, subsidence, collapse, or expansive soils, and impacts would be the same as under the proposed CPU.

6.2.2.4 Greenhouse Gas Emissions and Energy

The No Project Alternative would result in 432,662 metric tons of carbon dioxide equivalent (MT CO₂E) greenhouse gas (GHG) emissions at buildout, which would be less than the estimated 520,753 MT CO₂E GHG emissions anticipated with buildout of the proposed CPU. However, 56 percent of emissions would be attributable to vehicle emissions under the adopted Mission Valley Community Plan's land use designations, while only 48 percent of emissions would be attributable to vehicle emissions under the proposed CPU. This is due to the CPU's focus on designating high-density mixed-use development within a 0.5-mile radius of high-quality transit. Like the proposed CPU, future vehicle emissions under the No Project Alternative would be less than the existing condition due to increased regulations and cleaner technologies that reduce mobile source emissions. While the No Project Alternative includes higher density development around transit corridors, it does not do so to the extent of the proposed CPU. Therefore, while impacts under the No Project Alternative would be less than significant, its overall GHG emissions would be greater compared to the proposed CPU. Additionally, like the proposed CPU, the No Project Alternative would result in less than significant impacts related to conflicts with plans and policies addressing GHGs; however, the No Project Alternative would not achieve the level of consistency with the Climate Action Plan (CAP) that the proposed CPU would achieve. Thus, although less than significant, impacts related to conflicts with plans or policies would be greater under the No Project Alternative compared to the proposed CPU.

In regards to energy use associated with construction and operation of future development under the No Project Alternative, energy would be consumed during construction operations and to provide operational lighting, heating, cooling, and transportation for future development. However, similar to the proposed CPU, future development projects occurring under the No Project Alternative would be required to meet the mandatory energy standards of the current California Energy Code (Title 24, Part 6 of the California Code of Regulations [CCR]), and implementation of the No Project Alternative would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the proposed CPU. In regards to operational energy use, future development occurring under the No Project Alternative would be required to implement energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen). While the No Project Alternative would not implement the sustainable design policies proposed under the CPU, future development would still be energy-efficient consistent with current building code standards and CAP requirements. Thus, although the No Project Alternative would not implement CPU design policies, short term construction and long-term operational energy impacts would be less than significant under the No Project Alternative, the same as the project.

In regards to transportation energy usage, under the No Project Alternative, the multi-modal improvements included as part of the proposed CPU that support reductions in VMT and assist in reducing excessive energy consumption related to transportation would not be implemented, and could therefore result in increased energy consumption related to transportation. However, the No Project Alternative would result in a reduction in overall development potential and vehicle trips compared to the proposed CPU. Thus, overall impacts related to transportation energy usage would be *less than significant*, the same as the proposed CPU.

6.2.2.5 Hazards and Hazardous Materials

The CPU area faces a Moderate fire threat, with some risk along the southern edge of the CPU area from adjacent Very High fire threat areas. As with the proposed CPU, compliance with General Plan policies and State and local regulations intended to reduce wildfires risks would serve to reduce wildfire-related impacts under the No Project Alternative to *less than significant*. Through the implementation of existing regulations and adherence to General Plan policies related to hazardous materials and waste sites, impacts to schools from hazardous materials, substances, or waste would also be *less than significant*. The No Project Alternative would neither impair implementation of nor interfere with San Diego County's Emergency Operations Plan and would have a *less than significant* impact. Compliance with existing regulations, including design standards related to emergency vehicle access in the San Diego Municipal Code (SDMC), would ensure that development under the No Project Alternative would have a *less than significant* impact on emergency evacuation or response plans. As there are no hazardous sites that would result in severe adverse effects within the CPU area, adherence to federal and State regulations and General Plan policies would reduce impacts related to hazardous materials sites to *less than significant*. All impacts under the No Project Alternative would be similar to those under the proposed CPU.

6.2.2.6 Historical, Cultural, and Tribal Cultural Resources

Implementation of the No Project Alternative would not directly result in the destruction of or damage to historical resources, archaeological resources, human remains, or tribal cultural resources. However, future development and redevelopment allowed under this alternative could have direct or indirect impacts on these resources. There is a moderate to high potential that as-yet-undiscovered archaeological or Native American resources could be found in the future, given that similar resources have been found around the CPU area.

The SDMC does not include regulations that ensure the successful preservation of all historic built environment resources in the CPU area. Therefore, impacts to historical resources are considered *significant and unavoidable*. For archeological resources, human remains, and tribal cultural resource impacts, current regulations and policies, including the City's Historical Resources Regulations and Historical Resources Guidelines, would not guarantee the successful preservation of all resources particularly those discovered over the course of future development. Therefore, potential impacts to archaeological and tribal cultural resources are considered *significant and unavoidable*. Impacts would generally be similar to those under the proposed CPU; however, as the No Project Alternative would not include the construction of the roadway crossings across the San Diego River, there would be less potential for this alternative to impact historical, cultural, or tribal cultural resources in the vicinity of the river.

6.2.2.7 Hydrology and Water Quality

Due to the existing built nature of the CPU area, the pattern and distribution of development under the No Project Alternative would be similar to the existing condition. Although development allowed under the proposed CPU would be slightly greater than what could occur under the No Project Alternative, the amount of impervious surface would likely be the same under the No Project Alternative and the proposed CPU due to the developed nature of the CPU area, and impacts associated with local surface runoff would be *less than significant*. Removal of policy

support for bridge crossings over the San Diego River under the No Project Alternative would have the same *less than significant* impact related to flooding and drainage patterns as the proposed CPU as any potential future bridge would not affect the flow of water. However, there are several developed areas within the CPU area that may be subject to flooding and are protected by provisionally accredited levees (PALs), which are not considered to provide flood protection because they do not meet FEMA's standards. Given the level of uncertainty regarding potential flooding impacts, development that occurs behind these PALs in accordance with the No Project Alternative would experience *significant and unavoidable* impacts associated with riverine flooding, similar to the proposed CPU. Future development under both the No Project Alternative and the proposed CPU would be required to comply with existing federal, State, and local regulations relative to runoff and water quality at the project level. Additionally, water quality impacts could be slightly reduced compared to the proposed CPU by removing the potential for trash and waste to enter the river from users of the proposed bridges. Thus, impacts under the No Project Alternative related to flooding and drainage patterns, water quality, and groundwater would be *less than significant*, similar to the proposed CPU and slightly less than under the proposed CPU with respect to potential water quality impacts.

6.2.2.8 Land Use

The No Project Alternative would retain the land use designations of the existing Mission Valley Community Plan and would be subject to the City's General Plan policies and SDMC regulations. In general, the land use framework of this alternative would accommodate the development proposed in the CPU area's Specific Plans. As with the proposed CPU, this alternative would not conflict with the environmental goals, objectives, or guidelines of applicable land use plans and therefore would have a *less than significant* impact on the environment. Compared to the proposed CPU, this alternative would be less successful in supporting the mobility or conservation goals of the applicable land use plans as it would not include proposed CPU policies aimed at increasing density, improving bicycle and pedestrian connectivity and accessibility, and reducing the biological impacts of development.

Implementation of the No Project Alternative would retain the existing Mission Valley Community Plan land use designations and therefore would have a *less than significant* impact regarding the development or conversion of designated open space to a more intensive land use, or a physical division of the community (as discussed in Chapter 5, there is no prime farmland in the CPU area), similar to the proposed CPU. The No Project Alternative would not conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other habitat conservation plans, nor would it conflict with the implementation of applicable requirements of the City's Environmentally Sensitive Lands (ESL) Regulations, or Biology Guidelines regarding the preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources. Impacts related to conflicts with the City's MSCP Subarea Plan or other habitat conservation plans would be *less than significant*, similar to the proposed CPU. Development under the No Project Alternative within the CPU area would be subject to the requirements of the airport land use compatibility plans (ALUCPs) for San Diego International Airport (SDIA) and Montgomery Field and associated FAA and City requirements and therefore impacts related to conflicts with an adopted ALUCP would be *less than significant*, similar to the proposed CPU.

6.2.2.9 Noise

Similar to the proposed CPU, under the No Project Alternative, sensitive noise receptors would be impacted by ambient noise increases from traffic on area roadways and exposure to vehicular noise from freeways as the CPU area is built out. While the No Project Alternative does not contain the proposed CPU policy changes intended to improve compatibility with the General Plan, both the No Project Alternative and the proposed CPU would be required to follow the City's noise regulations as well as State regulations such as the CCR Title 24. However, even with implementation of these regulations, existing noise sensitive land uses and future noise sensitive land uses would be subject to potential noise impacts from ambient and transportation noise. Therefore, impacts associated with land use compatibility would be *significant and unavoidable* under both the No Project Alternative and the proposed CPU. Likewise, airport noise issues would have the same *less than significant* impact under the No Project Alternative and the proposed CPU. Construction-related noise impacts would also *significant and unavoidable* under both the No Project Alternative and proposed CPU. While all future projects under either scenario would comply with the City's Noise Abatement and Control Ordinance, there is a potential for the construction of future projects to expose existing sensitive receptors to significant noise levels resulting in significant unavoidable impacts. Groundborne vibration and noise impacts under both the No Project Alternative and the proposed CPU would be *less than significant* as current trolley operations do not cause significant vibration levels and new development would be required to comply with CCR Title 24 requirements associated with interior noise levels attributable to exterior sources. Overall, the No Project Alternative would result in the same impacts as the proposed CPU. Impacts related to ambient noise increases, land use compatibility (traffic noise exposure), and temporary construction noise would be *significant and unavoidable*, while impacts related to airport noise, noise ordinance compliance, and groundborne vibration and noise would be *less than significant*.

6.2.2.10 Paleontological Resources

The CPU area is underlain by five geologic formations that are considered to be of high sensitivity for paleontological resources. Buildout of future projects could result in a certain amount of disturbance to the native bedrock and could expose these formations and their associated fossil remains. Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC, would ensure that impacts to paleontological resources under both the No Project Alternative and the proposed CPU would be *less than significant*.

6.2.2.11 Public Services and Facilities

Implementation of the No Project Alternative would result in a lower residential population than estimated at buildout of the proposed CPU; therefore, this alternative would be expected to have fewer impacts related to public services and facilities than the proposed CPU. Overall population growth under the No Project Alternative could contribute to the need for new police and fire facilities to maintain the San Diego Police Department's (SDPD's) service ratio goal and ensure adequate fire protection. The No Project Alternative would not include proposed CPU

implementing actions that support the development of a satellite police station or the collocation of a new Fire-Rescue station just outside of the CPU area with the existing SDPD facility at that site. Construction of any new police and fire service facilities deemed necessary under the alternative could result in environmental impacts but would be subject to existing regulations that would reduce impacts. However, as specific details regarding the construction and operation of new police and fire service facilities are not known at this time, this impact would be *significant and unavoidable*, although slightly less than the proposed CPU.

As buildout of the No Project Alternative would result in lower residential population growth than that estimated at buildout of the proposed CPU, it would generate a smaller student population and thus have fewer impacts on school capacity than the proposed CPU. As with the proposed CPU, residential population growth under the No Project Alternative would generate middle and high school populations that could be accommodated by existing facilities. Residential population growth could generate an elementary school population that would exceed existing capacity but to a lower extent than the proposed CPU. To ensure that school space is available for future residential growth, the San Diego Unified School District (SDUSD) may undertake a number of potential measures, including a reduction in the number of non-resident students or adjustments to attendance boundaries. Pursuant to SB 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities. While SDUSD would collect fees from future development to fund school facilities, if needed, this impact would be *significant and unavoidable* under both the No Project Alternative and the proposed CPU since impacts associated with the construction and operation of any future facility are not known at this time.

Neither the proposed CPU nor the No Project Alternative proposes construction of new library facilities, though either would result in an increase in residents and demand for library services. The CPU area is generally covered by the two-mile service area of existing libraries, one of which is currently under construction to be expanded. In the event that implementation of the No Project Alternative results in the need for new or expanded library facilities, existing development regulations would serve to reduce potential environmental impacts associated with construction. Nevertheless, impacts to libraries resulting from implementation of the No Project Alternative would be *significant and unavoidable*, similar to the proposed CPU, as impacts associated with the construction and operation of any future facility are not known at this time.

Implementation of the No Project Alternative would not impact existing parks and open space. However, this alternative would not include proposed CPU provisions to promote the creation of public parks and open spaces or the integration of new development with existing parks and open spaces, and would result in less available parkland than the proposed CPU. Although the No Project Alternative would result in lower population growth than estimated at buildout of the proposed CPU, the availability of parkland under implementation of the No Project Alternative does not meet General Plan standards for population-based parks and recreation facilities. Overall impacts related to parks and recreation facilities would be *significant and unavoidable*, similar to the proposed CPU, as specific details regarding the construction and operation of facilities need to serve the community are not known at this time; however, under the No Project Alternative may be slightly less since potentially less facilities would need to be constructed.

6.2.2.12 Public Utilities and Infrastructure

The Metropolitan Water District (MWD) and San Diego County Water Authority (SDCWA) have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. As discussed in the Water Supply Assessment (WSA) for the CPU (Appendix L), the City's 2015 Urban Water Management Plan (UWMP) demonstrates that there would be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur within the CPU area by 2040. Implementation of the No Project Alternative would result in a lower population than estimated at buildout of the proposed CPU. Implementation of the No Project Alternative would result in an increased water demand consistent with assumptions included in the regional water resource planning documents of the Public Utilities Department (PUD), SDCWA, and MWD. Thus, impacts related to water supply would be *less than significant* and would likely be less significant than the proposed CPU. The No Project Alternative could require the construction of additional storm water, sewer, or water distribution infrastructure or communications systems as future development occurs. As specific details are currently unknown, physical impacts related to the construction of utilities infrastructure would be *significant and unavoidable* under the No Project Alternative, similar to the proposed CPU. As with the proposed CPU, the No Project Alternative would not have any significant solid waste impacts but would not include proposed CPU policies that provide for efficiencies in solid waste management. Thus, overall, the impact on solid waste management is *less than significant*, similar to the proposed CPU.

6.2.2.13 Transportation

The No Project Alternative assumed the buildout of the 1985 Mission Valley Community Plan. Roadway classification assumptions were largely based on the currently adopted Community Plan *Horizon Year Recommended Street Classification* (Figure 13 and Page 83 of the *1985 Mission Valley Community Plan*). Exceptions were made based on high-level feasibility review of the adopted plan classifications. For example, Riverwalk Drive is classified as a four-lane roadway in the adopted Community Plan, but there is insufficient right-of-way (ROW) to accommodate more than two lanes due to the Trolley ROW. These exceptions were documented in Section 4.1 of the Mission Valley Community Plan Update TIS, which is included as Appendix D of this PEIR. Chapter 4 of the Mission Valley Community Plan Update TIS also provides results of the traffic impact analysis for the No Project Alternative. The No Project Alternative would result in a LOS E or F along 46 roadway segments, and have a significant traffic impact to 44 of those 46 roadway segments, when comparing to the existing conditions. Implementation of the No Project Alternative would result in a significant impact on 35 of directional freeway segments.

With regard to bicycle facilities, the No Project Alternative (currently adopted community plan) proposed the following improvements to the existing conditions:

Class II (Bike Lane) Facilities:

- Riverwalk Drive, between Friars Road and Fashion Valley Road
- Camino Del Rio North, between Mission City Parkway and 1800 feet west of Ward Road
- Camino Del Rio South, between the western terminus and Mission Center Road
- Bachman Place, between Hotel Circle South and the southern community boundary

- Mission Center Road, between Camino Del Rio North and Camino Del Rio South
- Fenton Parkway, between the northern terminus and Friars Road
- Fenton Parkway, between the southern terminus and Camino Del Rio North
- Northside Drive, between the northern terminus and the Lowe's frontage road

Class III (Bike Route) Facilities:

- San Diego Mission Road, between Mission Village Drive and Rancho Mission Road
- Rio San Diego Drive, between Qualcomm Way and Fenton Parkway
- Camino De La Reina, between Avenida Del Rio and Mission Center Road
- Camino Del Rio South, between Mission City Parkway and Fairmount Avenue
- Avenida Del Rio, between Riverwalk Drive and Camino De La Reina
- Mission City parkway, between Camino Del Rio North and Camino Del Rio South

With regard to pedestrian facilities, the No Project Alternative (currently adopted community plan) proposed the following improvements to the existing conditions:

- Above or below grade crossing along Via Las Cumbres across Friars Road
- Above or below grade crossing along Avenida De Las Tiendas across Friars Road
- Above or below grade crossing along Frazee Road across Friars Road
- Above or below grade crossing along Santo Road across Friars Road
- Above or below grade crossing along Camino Del Este across Rio San Diego Drive
- Above or below grade crossing along Rio Bonito Way across Rio San Diego Drive
- Above or below grade crossing along San Diego River trail across Mission Center Road
- Above or below grade crossing at Mission Gate Driveway across Camino De La Reina
- Above or below grade crossing along Mission Center Road across Camino De La Reina
- Above or below grade crossing along Qualcomm Way across Camino Del Rio South
- Major Pedestrian path along Mission Village Drive, between Friars Road and Camino Del Rio North
- Major Pedestrian path along I-15 Northbound, between Friars Road and Camino Del Rio North
- Major Pedestrian path along Santo Road, between Friars Road and San Diego Mission Road
- Major Pedestrian path along Fairmount Avenue, between Friars Road and San Diego Mission Road
- Major Pedestrian path along Rio San Diego Drive, between Mission Center Road and Camino Del Este

- Major Pedestrian path along San Diego Mission Road, between Rancho Mission Road and Fairmount Avenue
- Complete the San Diego River Trail between the following segments:
 - North Side of the San Diego River Trail, between Friars Road and Fashion Valley Road
 - North Side of the San Diego River Trail, between Qualcomm Way and Rancho Mission Road
 - South side of the San Diego River Trail, between Qualcomm Way and Rancho Mission Road
 - South Side of the San Diego River Trail, between Taylor Street and Camino De La Reina
- Major Pedestrian path along Hotel Circle North, between Fashion Valley Road and Camino De La Reina
- Major Pedestrian path along Camino Del Rio North, between Mission Center and Camino Del Este
- Major Pedestrian path to Mission Hill at approximately Hotel Court
- Major Pedestrian Path along Colusa Street extension between Friars Road and Hotel Circle North, including pedestrian crossing across the San Diego River.
- Major Pedestrian path along Via Las Cumbres extension between Friars Road and Hotel Circle North, including pedestrian crossing across the San Diego River.
- Major Pedestrian Crossing along Fenton Parkway extension between the current southern terminus and Camino Del Rio North
- Complete sidewalk along Qualcomm Way between Camino Del Rio North and Camino Del Rio South

The No Project Alternative would result in significant and unavoidable impacts to 44 roadway segments and 35 directional freeway segments. In comparison, the proposed CPU would have a significant and unavoidable impact to 27 roadway segments and 20 directional freeway segments. The transportation and circulation improvements that are included for the proposed CPU are described in Section 4.13 of this PEIR and include the implementation of a system of active transportation facilities that accommodate bicyclists and pedestrians. The proposed CPU's transportation and circulation improvements focus on providing mobility facilities that support walking and bicycling and that connect to transit and recreational opportunities within the Mission Valley community and in adjacent communities. Regarding consistency with applicable plans and policies related to alternative transportation, the No Project Alternative would not include all of the proposed CPU policies that support increasing multi-modal opportunities consistent with SANDAG's Regional Plan, as well as the City's General Plan and the CAP. These guiding documents all have been created or updated since the current Mission Valley Community Plan was adopted in 1985. While the No Project Alternative would not result in significant impacts related to conflicts with plans and policies addressing alternative transportation, this alternative would not achieve the level of consistency with the applicable guiding plans and policies that the proposed CPU would achieve. Thus, impacts related to alternative transportation would be *less than*

significant and slightly greater with the No Project Alternative when comparing to the proposed CPU.

Both the No Project Alternative and the proposed CPU would help meet the project objectives to ~~create~~ by planning for a complete mobility system that promotes access for pedestrians, bicycles, and transit. However, the proposed CPU would meet these objectives to a greater degree because infrastructure called for in the CPU includes ~~it focuses~~ bicycle and pedestrian improvements ~~on those~~ that provide connections to transit; ~~provides~~ a greater number of separated or protected (Class I and Class IV) bicycle facilities; and ~~provides~~ enhanced pedestrian facilities, including pedestrian prioritized intersection crossings.

6.2.2.14 Visual Effects and Neighborhood Character

Implementation of the No Project Alternative would be consistent with existing land use designations and would not result in a substantial obstruction of a vista or scenic view within the planning area. Non-residential development under the No Project Alternative would be similar to that of the proposed CPU, while the increase in residential development over existing conditions would be less significant under the No Project Alternative compared to the proposed CPU. Thus, similar to the proposed CPU, the No Project Alternative would have a *less than significant* impact on views and scenic vistas in the CPU area, but may have less of an impact due to lower amounts of residential development. Development under the No Project Alternative would be in line with the urbanized nature of the CPU area and would have a *less than significant* impact on the existing neighborhood character, similar to the proposed CPU. There are no distinctive or landmark trees or mature stand of trees designated within the CPU area and development under the No Project Alternative is required to comply with regulations within the Hillside Conservation, Design, and Height Limitation Subdistrict and the San Diego River Subdistrict regulations of the Mission Valley PDO regarding the preservation and incorporation of trees. Therefore, buildout of the No Project Alternative would result in a *less than significant* impact on distinctive, landmark, or mature trees, similar to the proposed CPU. Development in the river area and on hillsides within the CPU area would need to comply with the SDMC's grading regulations and existing Mission Valley Community Plan policies and PDO addressing grading and development on hillsides, and therefore would have a *less than significant* impact on the existing landform. Given that the No Project Alternative would not include the proposed CPU's roadway extensions across the San Diego River, this alternative would potentially have less of an impact on the existing landform compared to the proposed CPU. Development under this alternative would necessitate the use of additional light fixtures but would have a *less than significant* impact on light and glare given compliance with SDMC restrictions on light and glare, similar to the proposed CPU.

6.3 Alternative I

6.3.1 DESCRIPTION

Alternative 1 differs from the proposed CPU in that it would not include the proposed Street “J” connection, which would extend from Friars Road to Hotel Circle South, or the extension of Fenton Parkway to Mission City Parkway/Camino Del Rio North. Therefore, there would be no new roadway extensions across the San Diego River. Alternative 1 would include all other policies, land use designations, and mobility improvements included in the proposed CPU. Projected buildout under Alternative 1 would be the same as the projected buildout for the proposed CPU. This alternative was developed to reduce potential impacts related to the construction of the roadway extensions across the river. The roadway network for Alternative 1 is shown in Figure 6.1-3.

6.3.2 ANALYSIS

6.3.2.1 Air Quality

The proposed land use designations under Alternative 1 would be the same as those under the proposed CPU. Thus, emissions associated with construction, area, and energy sources would be the same as what would occur under implementation of the proposed CPU. However, without the Street “J” and Fenton Parkway connections across the river, trip lengths would increase, resulting in greater mobile source emissions under this alternative. Specifically, buildout of the proposed CPU would generate 2,357,631 vehicle miles traveled (VMT), while buildout of Alternative 1 would generate 2,372,227 VMT, which is an increase of 14,596 VMT over the proposed CPU. Like the proposed CPU, Alternative 1 would result in greater development intensities, and would generate future VMT that is greater than buildout of the adopted Community Plan. Thus, both Alternative 1 and the proposed CPU would conflict with implementation of the RAQS, resulting in a *significant and unavoidable* air quality impact related to consistency with the RAQS. Impacts associated with air quality standards (*significant and unavoidable*), sensitive receptors (*less than significant*), and odor (*less than significant*) under Alternative 1 would be the same as under the proposed CPU.

6.3.2.2 Biological Resources

Like the proposed CPU, Alternative 1 would result in land use designation changes that would affect primarily developed areas. Therefore, Alternative 1 would result in similar impacts to biological resources as those anticipated under the proposed CPU. The removal of the Fenton Parkway and Street “J” connections over the San Diego River under Alternative 1 would reduce potential impacts biological resources compared to the proposed CPU, as these river crossings would no longer be proposed. Like the proposed CPU, subsequent development under this alternative would be required to adhere to all applicable federal, State, and local regulations regarding the protection of biological resources. Therefore, impacts to sensitive species, sensitive habitats, wetlands, wildlife corridors and nursery sites, and the City’s MSCP under Alternative 1 would be *less than significant*, the same as the proposed CPU.

6.3.2.3 Geology, Soils, and Seismicity

While seismic hazards are present in the planning area, adherence to applicable State and local safety codes and ordinances would reduce the risk of loss, injury, or death from these hazards under this alternative to *less than significant*, similar to the proposed CPU. Adherence to City-mandated grading requirements would ensure that cumulative impacts related to the erosion of soil associated with future development would be *less than significant*, similar to the proposed CPU. City policies require preparation of a geotechnical report and relevant mitigation measures for development in areas with liquefaction potential and conditionally in all other hazard categories present in the CPU area, and no Building Permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. Therefore, development under Alternative 1 would have a *less than significant* impact related to landslides, lateral spreading, liquefaction, subsidence, collapse, or expansive soils, similar to the proposed CPU.

6.3.2.4 Greenhouse Gas Emissions and Energy

The land use designations under Alternative 1 would be the same as those under the proposed CPU. Thus, the GHG emissions associated with construction activities, energy use, area sources, water use, and solid waste generation would be the same compared to the proposed CPU. However, as discussed under Section 6.3.2.1, Air Quality, because trip lengths under Alternative 1 would be slightly longer, GHG emissions associated with mobile sources would be greater when compared to the proposed CPU. However, Alternative 1 would include the same land use designations and policies to implement the City's CAP and the General Plan's City of Villages Strategy as the proposed CPU. Thus, impacts associated with conflicts with GHG plans or policies under Alternative 1 would be *less than significant*, the same as the proposed CPU.

In regard to energy use associated with the construction and operation of future development under Alternative 1, energy would be consumed during construction operations and to provide operational lighting, heating, cooling, and transportation for future development. However, similar to the proposed CPU, future development projects occurring under Alternative 1 would be required to meet the mandatory energy standards of the current California Energy Code (Title 24, Part 6 of the CCR), and implementation of Alternative 1 would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the proposed CPU. In regard to operational energy use, future development occurring under Alternative 1 would be required to implement energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen). Short term construction and long-term operational energy impacts would be less than significant under Alternative 1, the same as the project.

In regards to transportation energy usage, the improvements included as part of the proposed CPU that support reductions in VMT and assist in reducing excessive energy consumption related to transportation would not be fully implemented, as it would not include the proposed CPU's "Street J" connection, which would extend from Friars Road to Hotel Circle South, or the extension of Fenton Parkway to Mission City Parkway/Camino Del Rio North. Although this alternative would not implement these features included as part of the proposed CPU and would therefore result in increased energy consumption related to increased vehicle trip lengths, overall long-term

operational energy impacts would be *less than significant* under Alternative 1, the same as the proposed CPU.

6.3.2.5 Hazards and Hazardous Materials

As with the proposed CPU, policies and regulations intended to reduce risk of wildfires are included in the General Plan and State and local regulations, reducing wildfire-related impacts under the alternative to *less than significant*. Through the implementation of existing regulations and adherence to proposed CPU policies related to hazardous materials and waste sites, impacts to schools from hazardous materials, substances, or waste would be *less than significant*. This alternative would neither impair implementation nor interfere with San Diego County's Emergency Operations Plan, and would thus have a *less than significant* impact. Compliance with existing regulations, including design standards related to emergency vehicle access in the SDMC, and new policies proposed in the CPU would ensure that associated development would have a *less than significant* impact on emergency evacuation or response plans. As there are no hazardous sites that would result in severe adverse effects within the planning area, adherence to federal and State regulations and General Plan policies would reduce impacts related to hazardous materials sites to a level that is *less than significant*. All impacts under this alternative would be similar to those under the proposed CPU.

6.3.2.6 Historical, Cultural, and Tribal Cultural Resources

Implementation of this alternative would not directly result in the destruction of or damage to historical resources, archaeological resources, human remains, or tribal cultural resources. However, future development and redevelopment allowed under this alternative could have direct or indirect impacts on these resources. There is a moderate to high potential that as-yet-undiscovered archaeological or Native American resources could be found in the future, given that similar resources have been found around the CPU area.

The SDMC does not include regulations that could ensure successful preservation of all historic built environment resources in the CPU area. Therefore, impacts to historical resources are considered *significant and unavoidable*. For archeological resources, human remains, and tribal cultural resource impacts, current regulations and policies, including the City's Historical Resources Regulations and Historical Resources Guidelines, does not guarantee the successful preservation of all resources particularly those discovered over the course of future development. Therefore, potential impacts to archaeological and tribal cultural resources are considered *significant and unavoidable*. Impacts would generally be similar to those under the proposed CPU; however, as Alternative 1 would not include the construction of Street "J" or the Fenton Parkway extensions across the San Diego River, there would be less potential for this alternative to impact historic or cultural resources in the vicinity of the river.

6.3.2.7 Hydrology and Water Quality

The land use development pattern for Alternative 1 would generally be the same as the proposed CPU. However, a nominal decrease in the potential for impervious pavement under Alternative 1 would occur due to the removal of the Street “J” connection and the Fenton Parkway river crossings when compared to the project. There are several developed areas within the CPU area that may be subject to flooding and are protected by provisionally accredited levees (PALs), which are not considered to provide flood protection because they do not meet FEMA’s standards. Given the level of uncertainty regarding potential flooding impacts, development that occurs behind these PALs in accordance with Alternative 1 would experience *significant and unavoidable* impacts associated with riverine flooding, similar to the proposed CPU. Future development under both Alternative 1 and the proposed CPU would be required to comply with existing federal, State, and local regulations related to runoff and water quality at the project level. Thus, impacts related to flooding and drainage patterns, water quality, and groundwater would be *less than significant*, the same as the proposed CPU.

6.3.2.8 Land Use

Land use designations and policies associated with Alternative 1 would be consistent with the San Diego Association of Governments (SANDAG) Regional Plan goals to develop compact, walkable communities close to transit connections and consistent with smart growth principles. This alternative would be consistent with and implement the General Plan’s City of Villages Strategy and would include proposed CPU policies that align closely with General Plan goals for mobility, urban design, public facilities and services, recreation, conservation, and historic preservation. In general, the land use framework of this alternative would accommodate the development proposed in the CPU area’s Specific Plans. As with the proposed CPU, implementation of this alternative would require updates to the SDMC. Similar to the proposed CPU, this alternative would not conflict with the environmental goals, objectives, or guidelines of applicable land use plans and therefore would have a *less than significant* impact on the environment.

Implementation of this alternative would not change the proportion of parks and open space/undevelopable areas within the CPU area and would include provisions to promote the creation of public parks and open spaces and the integration of new development with existing parks and open spaces. It would have a *less than significant* impact related to open space and physical division of the community, similar to the proposed CPU.

Proposed CPU policies and actions included under this alternative do not conflict with the provisions of the City’s MSCP Subarea Plan or other habitat conservation plans and would support the implementation of applicable requirements of the ESL Regulations, Biology Guidelines, and the MSCP Subarea Plan regarding the preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources. Therefore, impacts would be *less than significant* under Alternative 1, similar to the proposed CPU. As discussed, subsequent development under this alternative and the proposed CPU would be required to adhere to all applicable federal, State, and local regulations regarding the protection of biological resources. Therefore, impacts to biological resources under Alternative 1 would be similar to those under the proposed CPU. Development under this alternative within the CPU area would be subject to the requirements of the ALUCPs for SDIA and Montgomery Field and associated FAA and City

requirements, and therefore impacts related to conflicts with an adopted ALUCP would be *less than significant*, similar to the proposed CPU.

6.3.2.9 Noise

As this alternative would have the same land use designations as the proposed CPU, anticipated noise impacts would be similar. Future development would be subject to increases in ambient noise levels and traffic noise as the CPU area is built out. Although Alternative 1 would result in greater VMT compared to the proposed CPU, it would generate the same number of daily trips as the proposed CPU and there would be no perceptible difference in traffic noise compared to the proposed CPU. As with the proposed CPU, impacts associated with ambient noise and land use compatibility under both scenarios would be *significant and unavoidable*. Additionally, temporary construction noise would be *significant and unavoidable* under both Alternative 1 and the proposed CPU. Future development implemented under both this alternative and the proposed CPU would be required to comply with applicable City and State noise regulations including CCR Title 24 building code requirements. Therefore, interior noise levels would meet regulatory standards and there would be a *less than significant* impact, similar to the proposed CPU. Impacts related to airport noise would be the same under both Alternative 1 and the proposed CPU, *less than significant*. Construction-related noise impacts would also be *significant and unavoidable* under both Alternative 1 and the proposed CPU. While all future projects under either scenario would be required to comply with the City's Noise Abatement and Control Ordinance, there is a potential for the construction of future projects to expose existing sensitive receptors to significant noise levels resulting in significant unavoidable impacts. Groundborne vibration and noise impacts under both the No Project Alternative and the proposed CPU would be *less than significant* as current trolley operations do not cause significant vibration levels and new development would be required to comply with CCR Title 24 requirements associated with interior noise levels attributable to exterior sources.

Overall, impacts related to ambient noise increases, land use compatibility (traffic noise exposure), and temporary construction would be *significant and unavoidable*, while impacts related to airport noise, noise ordinance compliance, and groundborne vibration and noise would be *less than significant*, similar to the proposed CPU.

6.3.2.10 Paleontological Resources

The CPU area is underlain by five geologic formations that are considered to be of high sensitivity for paleontological resources. Buildout of future projects could result in a certain amount of disturbance to the native bedrock and could expose these formations and their associated fossil remains. Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC, would ensure that impacts to paleontological resources under both Alternative 1 and the proposed CPU would be *less than significant*.

6.3.2.11 Public Services and Facilities

Implementation of Alternative 1 is projected to result in the same residential population at buildout as the proposed CPU; therefore, this alternative would have similar impacts on public services and facilities as the proposed CPU. In order to serve the CPU area's buildout population at the SDPD's service ratio goal, SDPD would need new officers, and new police facilities may eventually be required to achieve and maintain service ratios. This population growth could also increase the call volume for fire protection in the CPU area, thereby increasing San Diego Fire-Rescue Department response times, and contributing to the need for new or altered facilities. The alternative would include implementation actions of the proposed CPU supporting the development of a satellite police station on the former Stadium site and the collocation of a new Fire-Rescue station with an existing SDPD facility just outside of the CPU area. While the City would collect fees from future development to fund needed infrastructure, such as police and fire stations, and the proposed CPU contains policies that support identifying funding to support the development and upgrading of police and fire stations within the CPU area, this impact would be *significant and unavoidable* under both Alternative 1 and the proposed CPU since impacts associated with the construction and operation of future facilities are not known at this time.

As with the proposed CPU, residential population growth under the alternative would generate an elementary school population that would exceed existing capacity while the middle and high school populations estimated at buildout could be accommodated by existing facilities. To ensure that school space is available for future residential growth, SDUSD may undertake a number of potential measures, including a reduction in the number of non-resident students or adjustments to attendance boundaries. Pursuant to SB 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities. While SDUSD would collect fees from future development to fund school facilities, if needed, this impact would be *significant and unavoidable* under both Alternative 1 and the proposed CPU since impacts associated with the construction and operation of any future facility are not known at this time.

Neither Alternative 1 nor the proposed CPU proposes the construction of new library facilities, though both would result in an increase in residents and demand for library services. The CPU area is generally covered by the two-mile service area of existing libraries, one of which is currently under construction to be expanded. In the event that implementation of the alternative results in the need for new or expanded library facilities, existing development regulations would serve to reduce potential environmental impacts associated with construction. Nevertheless, impacts to libraries resulting from implementation of the alternative would be *significant and unavoidable*, similar to the proposed CPU, as impacts associated with the construction and operation of any future facility are not known at this time.

The alternative would include proposed CPU policies and implementing actions to develop new parks, trail amenities, and recreation facilities in the planning area. Based on the projected population for the proposed CPU, existing and proposed new parkland introduced under this alternative may not satisfy General Plan standards for population-based parks and recreation facilities. Thus, there may be a need for additional parkland to serve the community at buildout of this alternative, which may be attained through parkland included in new developments or park equivalencies as provided for in the proposed CPU policies. Potential environmental impacts associated with the construction of new parks, park equivalencies, and recreation facilities would

be reduced by existing regulations and proposed CPU policies aimed at reducing the potential biological impacts of recreation facilities. Nevertheless, this impact would be *significant and unavoidable*, similar to the proposed CPU, since impacts associated with the construction and operation of any future park facilities are not known at this time.

6.3.2.12 Public Utilities and Infrastructure

The MWD and SDCWA have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. As discussed in the WSA for the proposed CPU, the City's 2015 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur within the CPU area by 2040. As projected buildout for Alternative 1 would be the same as the proposed CPU, projected demand for public utilities would also be expected to be the same. Therefore, as with the proposed CPU, impacts related to water supply for Alternative 1 would be *less than significant*. No new storm water, sewer, or water distribution facilities or communications systems are proposed under Alternative 1 or the proposed CPU; however, the construction of these facilities may occur as future development occurs in the CPU area. As specific details are currently unknown, physical impacts related to the construction of utilities infrastructure would be *significant and unavoidable* under both Alternative 1 and the proposed CPU. Given the same projected buildout and land use pattern as the proposed CPU, the alternative would have the same *less than significant* impacts related to solid waste management.

6.3.2.13 Transportation

Alternative 1 would generate identical amount of vehicle trips when compare to the proposed CPU as they share the same land use plan. Appendix G of the Mission Valley CPU Traffic Impact Study (TIS) summarizes an assessment of the need for the two high-water roadway connections that would be provided in the proposed CPU which are not included in Alternative 1. Concerns with not including either of these high-water roadway connections include public safety considerations – providing for adequate emergency response and access, including during flood conditions when all other roadways crossing the San Diego River are impassable; and providing for adequate active transportation, access to transit, and traffic and transit operations. Based on these issues, Alternative 1 would not meet the project objective to accommodate new roadway connections within developed areas or areas planned for development for improved connectivity and adequate emergency access and response.

Chapter 8 of the Mission Valley Community Plan Update TIS (included as Appendix D of this EIR), provides the results of the traffic impact analysis based on the Alternative 1 roadway network. Implementation of Alternative 1 would result in a LOS E or F along 45 roadway segments, and have a significant traffic impact to 41 of the 45 roadway segments, when comparing to the existing conditions. Alternative 1 would result in a significant impact on ~~32~~ 31 directional freeway segments. Similar to the proposed CPU, Alternative 1 would result in significant and unavoidable impacts to the 41 roadway segments and ~~32~~ 31 directional freeway segments. Alternative 1 would result in 3 more impacted roadway segments than the proposed CPU (41 roadway segments would be significantly impacted under Alternative 1 whereas 38 [Section 4.13 collapsed these 38 segments into 27 segments by combining adjacent segments along the same roadway] roadways would be significantly impacted under the proposed CPU). The number of significantly impacted freeway segments would be the same (~~32~~ 31 directional segments) as the Proposed CPU. Therefore,

Alternative 1 impacts to roadway and freeway facilities would be *significant and unavoidable*, and higher than the proposed CPU.

Regarding consistency with applicable plans and policies related to alternative transportation, Alternative 1 would include the same planned mobility improvements and policies as in the proposed CPU, including those that support increasing multi-modal opportunities consistent with SANDAG's Regional Plan, as well as the City's General Plan and the CAP except it would not provide direct bicycle, pedestrian, and transit connections across the San Diego River to the proposed Riverwalk transit station and existing Fenton Parkway Station. Therefore, Alternative 1 would not implement the project objectives to create a better connected mobility system that promotes access for pedestrians, bicycles, and transit, as well as not accommodating new roadway connections within developed areas or areas planned for development for improved connectivity and adequate emergency access and response. Unlike the proposed CPU, Alternative 1 would result in significant impacts related to conflicts with plans and policies addressing alternative transportation. Thus, impacts related to alternative transportation would be *significant and unavoidable*.

6.3.2.14 Visual Effects and Neighborhood Character

Implementation of this alternative would not result in substantial obstruction of a vista or scenic view within the CPU area. The alternative would not include the proposed CPU's roadway extensions crossing the San Diego River and therefore would have a less substantial impact on scenic views from existing roadways, critical view corridors, and open spaces; the impact would be *less than significant*. As with the proposed CPU, development under the alternative would be in line with the urbanized nature of the CPU area and would be subject to proposed CPU policies related to blocks and lots, streetscapes, building placement and orientation, and building form and design, thus having a *less than significant* impact on the existing or planned character of the CPU area, similar to the proposed CPU. There are no distinctive or landmark trees or mature stand of trees designated within the CPU area and development under Alternative 1 is required to comply with regulations within the Hillside Conservation, Design, and Height Limitation CPIOZ and the San Diego River CPIOZ regarding the preservation and incorporation of trees. Alternative 1 would also have the same proposed CPU policies in place that incorporate trees into site plans and along roadways, ultimately increasing the urban forestry canopy within the CPU area, resulting in a similar *less than significant* impact to the proposed CPU. As with the proposed CPU, grading in the river area and on hillsides within the CPU area would need to comply with the San Diego River CPIOZ; the Hillside Conservation, Design, and Height Limitation CPIOZ; and the SDMC's grading regulations, and therefore would have a *less than significant* impact on the existing landform. As this alternative would not include the proposed CPU's roadway extensions crossing the San Diego River, it would have less of an impact on the existing landform of the river area compared to the proposed CPU. Development under the alternative would necessitate the use of additional light fixtures like the proposed CPU, but would have a *less than significant* impact on light and glare given compliance with proposed CPU policies encouraging lighting that is energy efficient and that minimizes light pollution and SDMC restrictions on light and glare. Development under this alternative may result in less of an impact regarding light and glare compared to the proposed CPU as it would not include new street lights along the proposed CPU roadway extensions crossing the San Diego River.

6.4 Alternative 2

6.4.1 DESCRIPTION

Alternative 2 differs from the proposed CPU in that instead of the ~~two-lane Street “J”~~ connection, the north-south connection would be made 900 feet to the west via a two-lane Via Las Cumbres connection. Like the proposed CPU Street “J” connection, the extension of Via Las Cumbres would include Class II buffered bicycle lanes and a painted median from Friars Road to ~~Levi-Cushman Street~~ ~~B-Riverwalk Street~~ “U”(with additional lanes at intersections as needed) and would bridge over the San Diego River; plus enhancements to Fashion Valley Road to raise it to the 15-year flood level and widen it to a four-lane major street with Class IV cycle track, which is the same as under the proposed CPU. Differing from the proposed CPU, the profile of this alternative would be much higher, as the Via Las Cumbres extension would be elevated over the MTS trolley track, instead of converting the existing berm into a bridge over Street “J”. For this alternative, the bridge would cross the river further west than under the proposed CPU. The roadway network for Alternative 2 is shown in Figure 6.1-4.

6.4.2 ANALYSIS

6.4.2.1 Air Quality

Alternative 2 proposes similar land uses and overall roadway network as the proposed CPU, except that the north-south connection would be provided via Via Las Cumbres. Both the proposed CPU and Alternative 2 would have similar impacts on air quality. Therefore, impacts associated with conflicts with air quality plans and air quality standards would be *significant and unavoidable*, similar to the proposed CPU. This alternative would generate a similar level of VMT as the proposed CPU and would result in the same development potential in the CPU area. Therefore, emissions associated with construction and operation of Alternative 2 would be the same as those associated with the proposed CPU. Impacts to sensitive receptors and odor impacts would also be the same. For Alternative 2, impacts associated with conflicts with air quality plans and air quality standards would be *significant and unavoidable*, while impacts related to sensitive receptors and odors would be *less than significant*, similar to the proposed CPU.

6.4.2.2 Biological Resources

Like the proposed CPU, Alternative 2 would result in land use designation changes that would affect primarily developed areas. Therefore, development occurring under Alternative 2 would result in similar impacts to biological resources as those anticipated under the proposed CPU. The construction and development associated with this Via Las Cumbres connection would result in permanent impacts to adjacent MHPA-designated lands associated with the San Diego River, as well as riparian woodland habitat. Therefore, implementation of Alternative 2 would result in potentially significant impacts to sensitive species, sensitive habitats, and wetlands, which would be greater compared to the proposed CPU. Future development under both the proposed CPU and Alternative 2 would be required to adhere to all applicable federal, State, and local regulations regarding the protection of biological resources. However, impacts under this alternative would have more of a conflict with the City’s MSCP because development associated with the road configurations would encroach into and /or permanently impact MHPA lands. As with the

proposed CPU, the MHPA Land Use Adjacency Guidelines would require certain measures to be incorporated into the design of projects adjacent to the MHPA to reduce potential indirect impacts to the MHPA to less than significant. However, as this this alternative would have the potential to impact a greater area of the MHPA, biological impacts would be greater under this alternative compared to the proposed CPU.

The biological impacts associated with wildlife corridors and nursery sites would be *less than significant*, the same as the proposed CPU. Impacts associated with sensitive species, sensitive habitats, wetlands, and conflicts with the City's MSCP would also be *less than significant*, but still greater than with the proposed CPU.

6.4.2.3 Geology, Soils, and Seismicity

While seismic hazards are present in the planning area, adherence to applicable State and local safety codes and ordinances would reduce the risk of loss, injury, or death from these hazards under this alternative to *less than significant*, similar to the proposed CPU. Adherence to City-mandated grading requirements would ensure that cumulative impacts related to the erosion of soil associated with future development would be *less than significant*, similar to the proposed CPU. City policies require the preparation of a geotechnical report and relevant mitigation measures for development in areas with liquefaction potential and conditionally in all other hazard categories present in the CPU area, and no Building Permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. Therefore, development under Alternative 2 would have a *less than significant* impact related to landslides, lateral spreading, liquefaction, subsidence, collapse, or expansive soils, similar to the proposed CPU.

6.4.2.4 Greenhouse Gas Emissions and Energy

The land uses and overall roadway network under Alternative 2 would be the same as the land uses under the proposed CPU. This alternative would also generate similar VMT as the proposed CPU. Thus, the GHG emissions associated with construction activities, mobile sources, energy use, area sources, water use, and solid waste generation would be the same as would occur under implementation of the proposed CPU. Alternative 2 would include the same land use designations and policies to implement the City's CAP and the General Plan's City of Villages Strategy as the proposed CPU, and would include the same bicycle network improvements as the proposed CPU. Thus, overall impacts related to GHG would be the same as the proposed CPU. Impacts under this alternative associated with GHG emissions and conflicts with plans or policies would be *less than significant*, the same as the proposed CPU.

In regards to energy use, Alternative 2 would consume a similar amount of energy during the construction and operation of future projects as the proposed CPU because the land use and transportation network would be the similar. Similar to the proposed CPU, implementation of Alternative 2 would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects under the proposed CPU. Future development occurring under Alternative 2 would be required to implement energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen). In addition, Alternative 2 would implement the energy conservation policies included as part of the proposed CPU that support the

minimization of energy consumption from operations associated with future development. Similar to the proposed CPU, short-term construction energy and operational energy use impacts would be *less than significant*.

In regards to transportation energy usage, under Alternative 2, the additional multi-modal improvements including Class II buffered bicycle lanes would further support reductions in VMT and assist in reducing excessive energy consumption related to transportation. Overall long-term operational energy impacts would be *less than significant* under Alternative 2, the same as the proposed CPU.

6.4.2.5 Hazards and Hazardous Materials

As with the proposed CPU, policies and regulations intended to reduce risk of wildfires are included in the General Plan and State and local regulations, reducing wildfire-related impacts under this alternative to *less than significant*. Through the implementation of existing regulations and adherence to proposed CPU policies related to hazardous materials and waste sites, impacts to schools from hazardous materials, substances, or waste would be *less than significant*. This alternative would neither impair implementation nor interfere with San Diego County's Emergency Operations Plan, and would thus have a *less than significant* impact. Compliance with existing regulations, including design standards related to emergency vehicle access in the SDMC, and new policies proposed in the CPU would ensure that associated development would have a *less than significant* impact on emergency evacuation or response plans. As there are no hazardous sites that would result in severe adverse effects within the planning area, adherence to federal and State regulations and General Plan policies would reduce impacts related to hazardous materials sites to a level that is *less than significant*. All impacts under this alternative would be at a similar level as those under the proposed CPU.

6.4.2.6 Historical, Cultural, and Tribal Cultural Resources

Implementation of this alternative would not directly result in the destruction of or damage to historical resources, archaeological resources, human remains, or tribal cultural resources. However, future development and redevelopment allowed under this alternative could have direct or indirect impacts on these resources. There is a moderate to high potential that as-yet-undiscovered archaeological or Native American resources could be found in the future, given that similar resources have been found around the CPU area.

For historic resource impacts, the existing SDMC does not include regulations that could ensure the successful preservation of all historic built environment resources in the CPU area. Therefore, impacts to historical resources are considered *significant and unavoidable*, the same as under the proposed CPU. For archeological resources, human remains, and tribal cultural resource impacts, current regulations and policies do not guarantee the successful preservation of all resources, particularly those discovered over the course of future development. Therefore, potential impacts to archaeological and tribal cultural resources are considered significant, and mitigation is required. Though mitigation measures requiring site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines would reduce these impacts, even with the application of this mitigation framework, impacts to archeological and tribal resources would remain *significant and unavoidable*, similar to the proposed CPU.

6.4.2.7 Hydrology and Water Quality

The proposed land use pattern for Alternative 2 is the same as the proposed CPU. There are several developed areas within the CPU area that may be subject to flooding and are protected by provisionally accredited levees (PALs), which are not considered to provide flood protection because they do not meet FEMA's standards. Given the level of uncertainty regarding potential flooding impacts, development that occurs behind these PALs in accordance with Alternative 2 would experience *significant and unavoidable* impacts associated with riverine flooding, similar to the proposed CPU. Future development under both Alternative 2 and the proposed CPU would be required to comply with existing federal, State, and local regulations relative to runoff and water quality at the project level. Thus, hydrology and water quality impacts under both Alternative 2 would be *less than significant*, the same as the proposed CPU.

6.4.2.8 Land Use

Land use designations and policies associated with Alternative 2 would be consistent with the SANDAG Regional Plan goals to develop compact, walkable communities close to transit connections and consistent with smart growth principles. This alternative would be consistent with and would implement the General Plan's City of Villages Strategy and would include proposed CPU policies that align closely with General Plan goals for mobility, urban design, public facilities and services, recreation, conservation, and historic preservation. Similar to the proposed CPU, this alternative would not conflict with the environmental goals, objectives, or guidelines of applicable land use plans and therefore would have a *less than significant* impact on the environment.

Implementation of the alternative would not change the proportion of parks and open space/undevelopable areas within the CPU area and would include provisions to promote the creation of public parks and open spaces and the integration of new development with existing parks and open spaces. It would have a *less than significant* impact related to open space and physical division of the community, similar to the proposed CPU.

Proposed CPU policies and actions included under this alternative do not conflict with the provisions of the City's MSCP Subarea Plan or other habitat conservation plans and would support the implementation of applicable requirements of the City's ESL Regulations, Biology Guidelines, and MSCP Subarea Plan regarding the preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources; therefore, there would be a *less than significant* impact regarding conflicts with these plans. Development under this alternative within the CPU area would be subject to the requirements of the ALUCPs for SDIA and Montgomery Field and associated FAA and City requirements and therefore impacts related to conflicts with an adopted ALUCP would be *less than significant*, similar to the proposed CPU.

6.4.2.9 Noise

The land use designations and policies under Alternative 2 would be the same as those under the proposed CPU. This alternative would also generate a similar level of VMT as the proposed CPU. Thus, noise impacts associated with Alternative 2 would be anticipated to be the same as those identified for the proposed CPU. While this alternative would extend Via Las Cumbres rather than provide a north-south connection via Street "J," such modification would not create perceptible

changes in noise compared to the proposed CPU, especially since these areas are dominated by vehicle traffic noise from I-8 and Friars Road. Future development implemented under both this alternative and the proposed CPU would be required to comply with applicable City and State noise regulations including Title 24 building code requirements. Therefore, the resulting noise impacts for both Alternative 2 and the proposed CPU would be the same. Impacts related to ambient noise increases, land use compatibility (traffic noise exposure), and temporary construction noise would be *significant and unavoidable*, while impacts related to airport noise, noise ordinance compliance, and groundborne vibration and noise would be *less than significant*.

6.4.2.10 Paleontological Resources

The CPU area is underlain by five geologic formations that are considered to be of high sensitivity for paleontological resources. Buildout of future projects could result in a certain amount of disturbance to the native bedrock and could expose these formations and their associated fossil remains. Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC, would ensure that impacts to paleontological resources under both Alternative 2 and the proposed CPU would be *less than significant*.

6.4.2.11 Public Services and Facilities

Implementation of Alternative 2 is projected to result in the same residential population at buildout as the proposed CPU; therefore, this alternative would have similar impacts on public services and facilities as the proposed CPU. In order to serve the CPU area's buildout population at the SDPD's service ratio goal, SDPD would need new officers and new police facilities may eventually be required to achieve and maintain service ratios. This population growth could also increase the call volume for fire protection in the CPU area, thereby increasing San Diego Fire-Rescue Department response times, and contributing to the need for new or altered facilities. The alternative would include implementation actions of the proposed CPU supporting the development of a satellite police station on the former Stadium site and the collocation of a new Fire-Rescue station with an existing SDPD facility just outside of the CPU area. Construction of new police and fire service facilities under the alternative could result in environmental impacts but would be subject to existing regulations and proposed CPU policies and implementation actions aimed at reducing potential negative environmental impacts resulting from the construction of new facilities. Additionally, the alternative would retain proposed CPU policies that would increase fire safety, provide access for emergency responders, and enhance the effectiveness of existing facilities to reduce the need for increased police service in the CPU area over time. Nevertheless, this impact would be *significant and unavoidable* under Alternative 2 and the proposed CPU since impacts associated with the construction and operation of future facilities are not known at this time, similar to the proposed CPU.

As with the proposed CPU, residential population growth under this alternative would generate an elementary school population that would exceed existing capacity while the middle and high school populations estimated at buildout could be accommodated by existing facilities. To ensure that school space is available for future residential growth, SDUSD may undertake a number of potential measures, including a reduction in the number of non-resident students or adjustments to

attendance boundaries. Pursuant to SB 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities. While SDUSD would collect fees from future development to fund school facilities, if needed, this impact would be *significant and unavoidable* under Alternative 2 and the proposed CPU since impacts associated with the construction and operation of any future facility are not known at this time, similar to the proposed CPU.

Neither Alternative 2 nor the proposed CPU proposes construction of new library facilities, though both would result in an increase in residents and demand for library services. The CPU area is generally covered by the two-mile service area of existing libraries, one of which is currently under construction to be expanded. In the event that implementation of the alternative results in the need for new or expanded library facilities, existing development regulations would serve to reduce potential environmental impacts associated with construction. Nevertheless, impacts to libraries resulting from implementation of the alternative would be *significant and unavoidable*, similar to the proposed CPU, as impacts associated with the construction and operation of any future facility are not known at this time.

The alternative would include proposed CPU policies and implementing actions to develop new parks, trail amenities, and recreation facilities in the planning area. Based on the projected population for the proposed CPU, existing and new parkland introduced under this alternative may not satisfy General Plan standards for population-based parks and recreation facilities. Thus, there may be a need for additional parkland to serve the community at buildout of the alternative, which may be attained through parkland included in new developments or park equivalencies as provided for in the proposed CPU policies. Potential environmental impacts associated with the construction of new parks, park equivalencies, and recreation facilities would be reduced by existing regulations and proposed CPU policies aimed at reducing the potential biological impacts of recreation facilities. Nevertheless, this impact would be *significant and unavoidable*, similar to the proposed CPU, since impacts associated with the construction and operation of any future park facilities are not known at this time.

6.4.2.12 Public Utilities and Infrastructure

The MWD and SDCWA have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. As discussed in the WSA for the proposed CPU, the City's 2015 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur within the CPU area by 2040. As projected buildout for Alternative 2 would be the same as the proposed CPU, projected demand for public utilities would also be expected to be the same. Therefore, as with the proposed CPU, impacts related to water supply for Alternative 2 would be *less than significant*. No new storm water, sewer, or water distribution facilities or communications systems are proposed under Alternative 2 or the proposed CPU; however, the construction of these facilities may occur as future development occurs in the CPU area. As specific details are currently unknown, physical impacts related to the construction of utilities infrastructure would be *significant and unavoidable* under both Alternative 2 and the proposed CPU. Given the same projected buildout and land use pattern as the proposed CPU, the alternative would have the same *less than significant* impacts related to solid waste management, similar to the proposed CPU.

6.4.2.13 Transportation

Alternative 2 would generate identical amount of vehicle trips when compare to the proposed CPU as they share the same land use plan. Aside from road alignment of the Street “J” connection and engineering design, this alternative essentially is the same as the proposed CPU from a traffic impact assessment perspective since both provide a single two-lane connection from Friars Road to Hotel Circle South. Chapter 6 of the Mission Valley Community Plan Update TIS (included as Appendix D of this EIR), provide the results of the traffic impact analysis based on the Alternative 2 roadway network. Implementation of Alternative 2 would result in a LOS E or F along 39 roadway segments, and have a significant traffic impact to 38 of the 39 roadway segments (as in Section 4.13, the 38 segments can be collapsed into 27 segments by combining adjacent segments along the same roadway), when comparing to the existing conditions. Alternative 2 would result in a significant impact on ~~32~~ 31 directional freeway segments. Similar to the proposed CPU, Alternative 2 would result in significant and unavoidable impacts to the ~~38~~ 27 roadway segments and ~~32~~ 31 directional freeway segments. The number of significantly impacted roadway segments and freeway segments would be the same as the proposed CPU. Therefore, Alternative 2 impacts to roadway and freeway facilities would be *significant and unavoidable*, and the same as the proposed CPU.

Regarding consistency with applicable plans and policies related to alternative transportation, Alternative 2 would include the same planned mobility improvements and mobility policies as in the proposed CPU policies, including those that support increasing multi-modal opportunities consistent with SANDAG’s Regional Plan, as well as the City’s General Plan and the CAP. Therefore, Alternative 2 would implement the project objectives to create a complete mobility system that promotes access for pedestrians, bicycles, and transit to the same degree as the proposed CPU. Similar to the proposed CPU, Alternative 2 would not result in significant impacts related to conflicts with plans and policies addressing alternative transportation. Thus, impacts related to alternative transportation would be *less than significant* and similar to the proposed CPU.

6.4.2.14 Visual Effects and Neighborhood Character

As with the proposed CPU, implementation of this alternative would not result in a substantial obstruction of a vista or scenic view within the CPU area. The introduction of Class II buffered bicycle lanes along Via Las Cumbres under this alternative would create an additional view corridor that the proposed CPU lacks. The impact on vistas or scenic views would be *less than significant*. Compared to the proposed CPU, this alternative would have a greater impact on the visual character of the CPU area, as Street “J” under the proposed CPU would be reduced in overall length and would not require crossing over the MTS trolley site. The Via Las Cumbres roadway extension under this alternative, unlike the proposed Street “J” connection, would have a greater visual impact and would increase shading of the San Diego River. As with the proposed CPU, development under this alternative would be in line with the urbanized nature of the CPU area and would be subject to proposed CPU policies related to blocks and lots, streetscapes, building placement and orientation, and building form and design, thus having a *less than significant* impact on the existing or planned character of the CPU area, similar to the proposed CPU. There are no distinctive or land mark trees or mature stand of trees designated within the CPU area and development under Alternative 2 is required to comply with regulations within the Hillside Conservation, Design, and Height Limitation CPIOZ and the San Diego River CPIOZ regarding preservation and incorporation of trees. Adherence to proposed CPU policies requiring the addition of trees into site plans and along

roadways, would ultimately increase the urban forestry canopy within the CPU area to a similar extent as the proposed CPU, resulting in a similar *less than significant* impact related to trees. As with the proposed CPU, grading in the river area and on hillsides within the CPU area is required to comply with the San Diego River CPIOZ, the Hillside Conservation, Design, and Height Limitation CPIOZ, and the SDMC's grading regulations, and therefore would have a *less than significant* impact on the existing landform. Development under this alternative would necessitate the use of additional light fixtures but would have a *less than significant* impact on light and glare given this alternative would have the same CPU policies encouraging lighting that is energy efficient and that minimizes light pollution, and would comply with SDMC restrictions on light and glare, similar to the proposed CPU.

6.5 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. CEQA Guidelines Section 15126.6[e] also requires that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified.

Table 6.1-1 summarizes the alternatives' overall environmental impacts for each environmental topic in Sections 6.2, 6.3, and 6.4. The No Project Alternative would have the least number of significant impacts, making it the environmentally superior alternative. However, per the CEQA Guidelines, another environmentally superior alternative must be identified. Alternative 1 and the proposed CPU each have the same number of significant impacts, while Alternative 2 would result in greater significant and unavoidable impacts. As Alternative 1 would not include the proposed CPU roadway extensions of Street "J" and Fenton Parkway across the San Diego River, it would result in the following considerations when compared to the proposed CPU:

- Less impacts to biological resources for the Street "J" and Fenton Parkway connections;
- Less potential to impact historical or cultural resources in the vicinity of the river;
- A slightly lower potential for impervious pavement and therefore flooding due to the removal of the proposed river crossings;
- Lower potential for light and glare, as it would not include new street lights along the proposed roadway connections over the San Diego River; and
- Less potential for obstruction of scenic views of the San Diego River.

While implementation of Alternative 1 would result in increased VMT compared to the proposed CPU, and, like the proposed CPU, would have a significant and unavoidable impact in regards to air quality standards and conflicts with applicable air quality plans, for the reasons discussed above, Alternative 1 is the environmentally superior alternative.

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9 Abbreviations

AADT: Annual average daily trips

AAQS: Ambient Air Quality Standards

ACC: Advanced Clean Cars

ADT: Average daily trips

AF: Acre-feet

AFY: Acre-feet per year

Airport Authority: San Diego County Regional Airport Authority

AIA: Airport Influence Area

ALUC: Airport Land Use Commission

ALUCP: Airport Land Use Compatibility Plan

AST: Aboveground storage tank

BMP: Best Management Practice

CAA: Clean Air Act

CAAQS: California Ambient Air Quality Standards

CAFE: Corporate Average Fuel Economy

CAL FIRE: California Department of Forestry and Fire Protection

CalARP: California Accidental Release Prevention

CalEEMod: California Emissions Estimator Model

CALGreen: California Green Building Standards Code

California EPA: California Environmental Protection Agency

CALNAGPRA: California Native American Graves Protection and Repatriation Act

CalRecycle: California Department of Resources Recycling and Recovery

Caltrans: California Department of Transportation

CAP: Climate Action Plan

CAPCOA: California Air Pollution Control Officers

CARB: California Air Resources Board

CCAA: California Clean Air Act

CCR: California Code of Regulations

CDFW: California Department of Fish and Wildlife

CEC: California Energy Commission

CED: California Energy Demand

CEQA: California Environmental Quality Act

CFR: Code of Federal Regulations

City: City of San Diego

CNDDDB: California Natural Diversity Database

CNEL: Community Noise Equivalent Level

CNPS: California Native Plant Society

CO: Carbon monoxide

CO₂E: Carbon dioxide equivalent

CPIOZ: Community Plan Implementation Overlay Zone

CPU: Community Plan Update

CPUC: California Public Utilities Commission

CREATE: Chicago Rail Efficiency and Transportation Efficiency

CRHR: California Register of Historical Resources

CTC: California Transportation Commission

CUPA: Certified Unified Program Agency

CWA: Clean Water Act

dB: Decibel

dBA: A-weighted decibels

DCSS: Diegan Coastal Sage Scrub

DEH: County of San Diego Department of Environmental Health

DG: Design Guideline

DIF: Development impact fee

DOT: United States Department of Transportation

DPM: Diesel particulate matter

DTSC: California Department of Toxic Substances Control

DWR: California Department of Water Resources

EB: Eastbound

EIR: Environmental Impact Report

EMFAC: Emission Factor model

EMS: Emergency Medical Services

EMT: Emergency Medical Technician

EO: Executive Order

EOC: Emergency Operations Center

ESA: Endangered Species Act

ESL: Environmentally Sensitive Lands

FAA: Federal Aviation Administration

FEMA: Federal Emergency Management Agency

FIRM: Federal Insurance Rate Map

FSDRIP: First San Diego River Improvement Project

FTA: Federal Transit Administration

GHG: Greenhouse gases

GWP: Global warming potential

H&SC: California Health and Safety Code

HCS: Highway Capacity Manual

HMBP: Hazardous Materials Business Plan

HMD: Hazardous Materials Division

HRB: San Diego Historic Resources Board

HVAC: Heating, ventilation, and air conditioning

I-: Interstate

IA: Implementing Action

IPCC: Intergovernmental Panel on Climate Change

ITS: Intelligent transportation systems

LCFS: Low Carbon Fuel Standard

LDC: San Diego Land Development Code

LEED: Leadership in Energy and Environmental Design

L_{eq} : One-hour equivalent noise level

LEV: Low emission vehicle

LID: Low impact development

L_{max} : Maximum sound level

LOS: Level of Service

LRT: San Diego Trolley

LRWRP: Long-Range Water Resources Plan

LTPP: Long-Term Procurement Plan

LUST: Leaking underground storage tank

MaaS: Mobility-as-a-Service

MBTA: Migratory Bird Treaty Act

MCAS: Marine Corps Air Station

MCL: Maximum contaminant level

MGD: Million gallons per day

MHPA: Multi-Habitat Planning Area

MJHMP: Multi-Jurisdictional Hazard Mitigation Plan

MMRP: Mitigation Monitoring and Reporting Program

MMT: Million metric tons

MMT CO₂E: Million metric tons of carbon dioxide equivalent

MOE: Measurement of effectiveness

MPH: Miles per hour

MPO: Metropolitan Planning Organization

MS4: Municipal Separate Storm Sewer System

MSCP: Multiple Species Conservation Program

MTS: San Diego Metropolitan Transit System

MW: Megawatt

MWD: Metropolitan Water District

NAAQS: National Ambient Air Quality Standards

NAGPRA: Native American Graves Protection and Repatriation Act

NAHC: Native American Heritage Commission

NB: Northbound

NCWRP: North City Water Reclamation Plant

NE: Narrow endemic

NEPA: National Environmental Protection Act

NFIP: National Flood Insurance Program

N₂O: Nitrogen oxide

NO₂: Nitrogen dioxide

NO_x: Oxides of nitrogen

NOP: Notice of Preparation

NPDES: National Pollutant Discharge Elimination System

NRHP: National Register of Historic Places

NRMP: Natural Resources Management Plan

OES: County of San Diego Office of Emergency Services

PAL: Provisionally Accredited Levee

PDO: Planned District Ordinance

PDP: Priority Development Project

PEIR: Program Environmental Impact Report

PLWTP: Point Loma Wastewater Treatment Plant

PM_{2.5}: Fine particulate matter

PM₁₀: Inhalable particulate matter

PRC: Public Resources Code

PUD: City of San Diego Public Utilities Department

PV: Photovoltaic

PWD: City of San Diego Public Works Department

RAQS: Regional Air Quality Strategy

RCP: Regional Comprehensive Plan

REC: Regional Energy Strategy

ROG: Reactive organic gas

RP: Regional Plan

RPS: Renewables Portfolio Standard

RTP: Regional Transportation Plan

RWQCB: Regional Water Quality Control Board

SANDAG: San Diego Association of Governments

SB: Senate Bill

SB: Southbound

SBWRP: South Bay Water Reclamation Plant

SCIC: South Coast Information Center

SCS: Sustainable Communities Strategy

SDAB: San Diego Air Basin

SDAPCD: San Diego Air Pollution Control District

SDCCU: San Diego County Credit Union

SDCWA: San Diego County Water Authority

SDFD: San Diego Fire-Rescue Department

SDG&E: San Diego Gas and Electric

SDIA: San Diego International Airport

SDMC: San Diego Municipal Code

SDPD: San Diego Police Department

SDRPMP: San Diego River Park Master Plan

SDUSD: San Diego Unified School District

SDWA: Safe Drinking Water Act

SFHA: Special Flood Hazard Area

SHMP: State Hazard Mitigation Plan

SIP: State Implementation Plan

SMAQMD: Sacramento Metropolitan Air Quality Management District

SO₂: Sulphur dioxide

SO_x: Sulphur oxide

SR-: State Route

SWIS: CalRecycle Solid Waste Information System Database

SWP: State Water Project

SWRCB: State Water Resources Control Board

TAC: Toxic air contaminant

TCM: Transportation Control Measure

TDM: Transportation demand management

TNC: Transportation network company

TIS: Transportation Impact Study

TMDL: Total Maximum Daily Load

TPA: Transit Priority Area

TSS: Threshold Siting Surfaces

UCSD: University of California San Diego

UDC: Unified Disaster Council

USACE: United States Army Corps of Engineers

USC: United States Code

USEPA: United States Environmental Protection Agency

USFWS: United States Fish and Wildlife Service

UST: Underground storage tank

UTC: University Town Center

UWMP: Urban Water Management Plan

VdB: Vibration decibel

VMT: Vehicle miles traveled

VOC: Volatile organic compound

VPHCP: Vernal Pool Habitat Conservation Plan

WB: Westbound

WMP: Waste Management Plan

WQIP: Water Quality Improvement Plan

WSA: Water Supply Assessment

WTP: Water Treatment Plant

ZEV: Zero emission vehicle

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