#332
3-30-93

City of San Diego
Planning Department

Development and Environmental
Planning Division
236-6460

Environmental Impact Report

DEP No. 89-1222
SCH No. 91061052

SUBJECT: Rancho Peñasquitos Community Plan Update. COMMUNITY PLAN AMENDMENT, AMENDMENT TO THE CITY OF SAN DIEGO PROGRESS GUIDE AND GENERAL PLAN, and related REZONES for the purpose of updating the currently adopted Peñasquitos East Community Plan text and land use plan (now referred to as the Rancho Peñasquitos Community Plan). The update involves comprehensive revisions to the community plan text and land use plan, including updating the existing conditions discussion, re-evaluating certain land use designations, and expanding the discussion of resource management. Rezoning proposals include applying the Institutional Overlay Zone to public facilities, applying the Community Plan Implementation Overlay Zone to some commercially-designated sites, and possibly downzoning certain undeveloped areas currently included within the Hillside Review Overlay Zone. The update also proposes to delete from the plan the proposal to extend Camino Ruiz across Los Peñasquitos Canyon, resulting in the need to amend the General Plan. The Rancho Peñasquitos Community, which encompasses approximately 6,500 acres, is located immediately to the west of Interstate 15, between Los Peñasquitos Canyon Preserve on the south and Rancho Bernardo Community on the north. Applicant: City of San Diego.

BACKGROUND:

Subsequent to public review of the draft EIR, there were several changes to the draft Plan. A summary of the changes and the revised land use plan (Figure A) follows these conclusions. Based on the Plan revisions, some of the draft conclusions of potential environmental impacts have changed.

Specifically, the fragmentation of habitat which was identified in the Black Mountain neighborhood has been substantially reduced due to reconfiguration of Paseo Valdear and designated residential development areas. In addition, the Plan has incorporated language identified in EIR alternative 4c regarding open space policies. With these two Plan revisions, implementation would no longer result in significant habitat fragmentation in the Black Mountain neighborhood.

The Plan has been revised to protect vernal pools and associated landforms and watersheds. Therefore, implementation of the Plan would not have a significant impact on vernal pools.

Also due to the reconfiguration of residentially designated areas and the redesign of Paseo Valdear, landform alteration and impacts on visual quality would be reduced substantially in the Black Mountain neighborhood. In the Penasquitos Creek and Parkview neighborhoods, Camino Ruiz has been reclassified from a 4-lane major street to a 4-lane collector. The reclassification would result in reduced grading requirements and the road would be narrower and less visible. Thus, project-specific landform and visual quality impacts would be reduced to below a level of significance; however, the cumulative impacts would remain significant because of the incremental loss in native landforms and the conversion of natural habitat and landscapes to urban uses.

SUMMARY AND CONCLUSIONS:

The proposed Rancho Peñasquitos Community Plan is an update of the Peñasquitos East Community Plan. The purpose of the update is mainly to address the public facility needs of the community which did not keep pace with the rapid development of the community in the 1980s. The community is approximately 85 per cent built out and the remaining undeveloped areas are largely designated for residential use.

A significant aspect of the draft plan involves the elimination of the connection of Camino Ruiz between Mira Mesa and Rancho Peñasquitos. The Camino Ruiz connection across Los Peñasquitos Canyon is identified in the Circulation Element of the City's Progress Guide and General Plan.

SIGNIFICANT IMPACTS

The following is a summary of the potential environmental impacts as a result of implementation of the draft plan. Some issues are associated with incremental impacts only.

BIOLOGY: Implementation of the draft plan would have significant project-specific and incremental impacts on biological resources. Development according to the plan would result in the direct loss of coastal sage scrub vegetation, the primary habitat for the California gnatcatcher, a candidate species for federal endangered species listing. The potential isolation of the coastal sage scrub habitat on Hilltop Community Park from other open space, due to development of roads and an elementary school, would have a significant impact on the gnatcatchers known to occupy the park site. Development of residential neighborhoods and roads according to the land use plan proposed for the Black Mountain area would result in fragmentation of habitat. In the Peñasquitos Creek and Parkview Neighborhoods, implementation of the plan would result in the direct loss of vernal pools; this is a significant impact because of the magnitude of the regional loss of this resource. In addition, in these two neighborhoods, the potential disturbance of a major wildlife movement corridor would have a significant impact on wildlife.

While implementation of the policies and plan proposals in the draft Rancho Peñasquitos Community Plan, as well as the Resource Protection Ordinance, would reduce the extent of impact to the sensitive biological resources, the actual impact of plan implementation can only be evaluated in

association with the processing of future discretionary permits. It is likely, however, that some portion of the existing sensitive resources will be lost to development, thereby contributing to the incremental loss of sensitive resources throughout the region. The EIR includes alternatives to reduce the impact.

LANDFORM ALTERATION/VISUAL QUALITY: Residential development of remaining undeveloped parcels in the community would result in significant landform/visual quality impacts. The most significant visual and landform alteration would be in the Black Mountain Neighborhood, where there is existing native vegetation on steep terrain with many rock outcrops. Development would replace the natural topography with manufactured slopes, streets, and urban structures. Millions of yards of earth would be moved and preliminary engineering indicates that fill slopes of up to 180 feet and cut slopes of up to 80 feet in height would be required for some of this development.

In the southern portion of the community, a second major significant visual impact would be associated with the construction of a stretch of Camino Ruiz, north of Los Peñasquitos Canyon. The road would result in the loss of native vegetation in a tributary canyon that is used as a wildlife corridor. The proposed alignment is along this canyon and then up the sideslopes onto the mesa. The new road would be visible from the park preserve and would attract much visual attention.

The conversion of native landforms and vegetation to manufactured urban forms would have a significant adverse impact on the visual nature of the community. The encroachment of development on such a prominent landmark as Black Mountain and the loss of another important canyon area contributes incrementally to the reduction in visual diversity in the City as a whole.

TRAFFIC: Direct traffic impacts would not result from implementation of the plan. The City's Engineering and Development Department has recommended specific street improvements which would be necessary to accommodate future traffic volumes. Provided those improvements are implemented, development according to the draft plan would not result in projected traffic which is substantial in relation to the capacity of the street system.

The proposal to not extend Camino Ruiz across Los Peñasquitos Canyon would not have a significant impact on traffic circulation in Rancho Peñasquitos. However, there would be significant impacts on traffic circulation in Mira Mesa due to increased volumes on already overloaded Black Mountain Road, Mira Mesa Boulevard, and Mercy Road. In addition, there would be a significant impact on the regional circulation system due to the elimination of an additional arterial parallel to Interstates 15 and 5. The severity of the impact to the regional transportation system of this proposal is partially related to the intensity of development ultimately permitted in the Future Urbanizing Area (FUA).

AIR QUALITY: Implementation of the draft plan would have significant project-specific and incremental impacts on air quality in the San Diego Air Basin. Both project-direct and incremental impacts are associated with

congestion that would result on Mira Mesa roadways if Camino Ruiz is not connected with Rancho Peñasquitos to provide an additional north-south arterial.

Implementation of the land use plan included within the proposed Rancho Peñasquitos Community Plan update would not directly adversely impact the ability of the region to attain federal air quality standards, because the proposal is to reduce permitted development from the adopted plan. However, any additional development in the region results in additional emissions which incrementally affect regional air quality standards.

LAND USE: The analyses for development suitability and consistency with the Resource Protection Ordinance, as required by City Council Policy 600-40, were not conducted. Therefore, a potentially significant impact on land use could occur if future development proposals which are consistent with the community plan but are not consistent with adopted resource protection regulations are proposed.

NOISE: Implementation of the draft plan would not have a significant impact on the acoustical environment in the community. Since all of the roadway segments expected to produce noise levels in excess of 60 dB(A) would be at least four-lane major roads, no homes would front directly on the roadways. Where the major roads are adjacent to single-family residential neighborhoods, large building setbacks or barriers such as berms and walls have already been or would be constructed to reduce exterior noise levels.

GROWTH-INDUCING IMPACT: The draft plan proposes the construction of two public schools in the Future Urbanizing Area adjacent to the western boundary of the community. Should residential development be proposed in the urban reserve, school facilities would already be proximate, and roads and public utilities would have to be extended a shorter distance. Therefore, public school construction in the urban reserve induces growth by providing services and facilities, the absence of which could make future development more difficult.

SIGNIFICANT CUMULATIVE IMPACTS:

Traffic: There would be significant incremental impacts on traffic circulation in Mira Mesa as a result of not connecting Camino Ruiz across Los Peñasquitos Canyon. Three intersections would operate at a Level of Service "D" or worse, even after implementation of recommended improvements.

Air Quality: There would be significant incremental impacts on air quality in the San Diego Air Basin as a result of the increased emissions due to backups at three intersections in Mira Mesa if Camino Ruiz is not constructed as a through arterial. In addition, the increased emissions due to development of currently undeveloped land in Rancho Peñasquitos would have a significant cumulative impact on air quality in the region.

Biological Resources: The loss of sensitive biological resources due to development of currently undeveloped residential- and commercial-designated sites would contribute incrementally to regional losses of these resources.

Landform Alteration: Just as biological resources are declining in the region, so are native landforms due to grading for development. The conversion of native landforms to urban development would contribute incrementally to the loss of unique characteristic landforms in San Diego.

SUMMARY OF ALTERNATIVES:

1. The "No Project" alternative would result in the retention of the goals and recommendations of the adopted community plan.

2. Public Facilities

   a. Retention of the planned extension of Camino Ruiz across Los Peñasquitos Canyon to Rancho Peñasquitos. This alternative would mitigate significant traffic and air quality impacts in Mira Mesa, but would result in significant impacts on biological resources and visual quality with bridge construction.

   b. Retention of the Camino Ruiz right-of-way. This alternative would achieve essentially the same goals as the prior alternative but delay the visual and biological impacts. In addition, it would delay the decision to construct the road until it was determined that resolution of traffic and air quality impacts outweigh potential visual and biological impacts.

   c. Elimination of Camino Ruiz in Peñasquitos Creek Neighborhood. This alternative would only be feasible if it is determined that Camino Ruiz will not be constructed as a through arterial. This alternative would eliminate a section of Camino Ruiz that may not be critical to circulation in the community. Adoption of the alternative would provide an opportunity to avoid loss of a critical wildlife corridor and sensitive coastal sage scrub habitat, as well as alleviating a potentially significant visual impact.

   d. Elimination of the extension of Paseo Valdear in the Black Mountain Neighborhood. This alternative would eliminate a section of Paseo Valdear which may not be critical to community circulation, but was planned to provide access to a designated residential area. The adoption of this alternative would result in major alleviation of significant visual impacts due to probable grading on the upper slopes of Black Mountain and the visual impact of a road across highly visible and steep terrain.

3. Black Mountain Neighborhood

   a. Very low density (Retention of A-1-10 Zone). This alternative involves reducing densities over the entire remaining portion of the area. Proposed zoning according to the alternative would be one dwelling unit per acre with guidelines for landform-sensitive development. This alternative would reduce impacts to biological resources, visual quality, and landform alteration.

b. Compacted development. This alternative involves maintaining the permitted number of units but clustering development near existing development rather than spreading over the upper slopes of Black Mountain. This alternative would also reduce impacts to biological resources, visual quality, and landform alteration.

c. Open Space Policies. This alternative provides that language be included in the community plan which would encourage use of the lower-value habitat "islands" and thus, retain the higher habitat values of the "connected" open spaces. Enhancing people/pet access to the "islands" created by development would relieve the pressure to accommodate these uses in high quality habitat that would be preserved for wildlife. Adoption of this alternative would further mitigate impacts to biological resources.

SIGNIFICANT IMPACTS LIKELY TO BE MITIGATED WITH FUTURE DISCRETIONARY PERMITS

HYDROLOGY/WATER QUALITY: Development of the undeveloped parcels in Rancho Peñasquitos could result in incremental impacts to downstream water quality by increased siltation in Los Peñasquitos Lagoon. Adherence to the Better Management Practices Program being developed by the City would reduce future development's contribution to project-direct and cumulative water quality and hydrology impacts.

CULTURAL RESOURCES: There is a potential for impacts to cultural resources as the remaining vacant parcels are developed; however, preservation of resources or mitigation of such impacts would be formulated in association with future discretionary permits.

LAND USE: Implementation of the draft plan would result in the conversion of approximately 10 acres of designated open space to industrial use for the development of a recreational vehicle parking/mini-storage facility. This proposed conversion would not have an impact on land use or biological resources. However, there would be a potential for a significant impact on visual quality because the proposed site is highly visible from some major roadways.

This impact on visual quality could be mitigated either by a sensitively designed project which is well screened, or by development of the needed facility in the industrially-zoned area of nearby Sabre Springs.

MITIGATION MEASURES INCORPORATED INTO THE PROJECT

TRAFFIC

The following measures are considered incorporated into the project because they are street improvements which will be implemented as part of the City's Capital Improvement Projects Program, rather than being contingent upon future discretionary approvals.

The following recommendations regarding specific roadway improvements have been developed by the City Engineering and Development Department.

Implementation of these improvements would avoid any potentially significant impact of traffic circulation which may be the result of proposed revisions to the adopted community plan.

1. State Route 56. SR 56 should be constructed as a six-lane freeway from I-15 to the western boundary of Rancho Peñasquitos.

2. Black Mountain Road. Improve from a four-lane major to a six-lane primary arterial from just north of Twin Trails Drive to the southern community boundary.

3. Rancho Peñasquitos Boulevard. Adopted classification is six-lane major between Carmel Mountain Road and Paseo Montril and is six-lane primary arterial between Paseo Montril and I-15. Change classification between Carmel Mountain Road and Azuaga Street to five-lane major street (3EB, 2WD), and between Azuaga Street and Interstate 15 to four lane major street.

4. Salmon River Road. The adopted community plan recommends improving the existing two-lane collector street to four-lane collector standards. However, the two-lane roadway is sufficient to accommodate forecasted volumes. Therefore, the proposed classification is a two-lane collector.

5. Peñasquitos Drive. The adopted plan designates this road as a four-lane major from Paseo Valdear to the northern community boundary. The recommendation in the draft plan is to retain as a local street due to topography and environmental impacts.

6. Carmel Mountain Road. Improve from a six-lane major to a six-lane primary arterial between Peñasquitos Drive and Interstate 15. Improve from a five-lane major to a six-lane major between Paseo Montalban and Rancho Peñasquitos Boulevard.

The EIR includes a discussion of recommended mitigation measures and alternatives that could reduce some of the identified impacts. A determination that the mitigation measures would be implemented in association with future discretionary actions, where appropriate, cannot be assured at this level of review. Additional environmental review, which would include the formation of project-specific mitigation measures, would be required for all future discretionary projects. A discussion of impacts and potential mitigation measures is provided in the attached EIR.

Lawrence C. Monserrate, Principal Planner
Environmental Analysis Section/Public Projects
Development & Environmental Planning Division

March 18, 1992
Date of Draft Report

November 9, 1992
Date of Final Report

Analyst: Myers

PUBLIC REVIEW:

The following individuals, organizations, and agencies received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency:

U.S. Government
- U.S.Fish & Wildlife Service
- Bureau of Land Management
- N.A.S., Miramar, Office of Community Planning

State of California
- CALTRANS, District 11
- California Coastal Commission
- Department of Fish & Game
- Regional Water Quality Control Board
- State Air Resources Board
- Department of Conservation

County of San Diego
- Department of Planning and Land Use
- Department of Parks & Recreation
- Air Pollution Control District

City of San Diego
- Engineering and Development Department
- Fire Department
- Office of Noise Abatement
- Planning Department
- Police Research & Analysis
- Property Department
- Water Utilities Department
- Parks & Recreation Department
- General Services Department
- Councilmember Behr, District 5
- Councilmember Wolfscheimer, District 1
- Mayor's Office

Other Agencies
- San Diego Association of Governments
- San Diego Transit Corporation
- Metropolitan Transit Development Board
- San Diego Gas & Electric
- Poway Unified School District
- Sierra Club
- San Diego Regulatory Alert
- North City Transportation Management Association
- Los Peñasquitos Canyon Citizens Advisory Committee
- Ellen Bauder
- Citizens Coordinate for Century 3
- League of Women Voters
- San Diego County Archaeological Society

Mira Mesa Community Planning Group
Mira Mesa Town Council
Homeowners of Peñasquitos Association
Peñasquitos News
Los Peñasquitos Lagoon Foundation
Friends of Los Peñasquitos Preserve
Mira Mesa Branch Library
Rancho Peñasquitos Planning Board
Rancho Peñasquitos Town Council
Rancho Bernardo Planning Board
Scripps-Miramar Ranch Planning Group
Miramar Ranch North Planning Group
Torrey Pines Community Planning Group
Rancho Santa Fe Association
Fairbanks Ranch Association
City of Del Mar
City of Poway

Copies of the draft EIR may be reviewed in the office of the Development and Environmental Planning Division, or purchased for the cost of reproduction.

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.

( ) Comments addressing the accuracy or completeness of the EIR were received during the public input period. The letters and responses follow.

REVISIONS TO DRAFT COMMUNITY PLAN:

Following the public review of the Draft EIR, the Draft Rancho Penasquitos Community Plan was revised. Below is a summary of the revisions to the Plan.

Plan revisions reflected in the November 1992 draft

1. Transportation Element: The street classification map (Figure 7) following page 13 has been revised. Changes include the reclassification of Camino Ruiz from Park Village Drive to Carmel Mountain Road from a 4-lane major to a 4-lane collector; Paseo Valdear in the Black Mountain neighborhood has been redesigned to satisfy only emergency vehicle access requirements on a portion between two areas designated for residential areas (this redesign responds to open space connectivity issues); collector street "J" in the Black Mountain neighborhood has been deleted.

2. The 1991 phasing plan for transportation and other public facilities has been deleted in the November 1992 draft plan. The phasing plan will appear in the Public Facilities Financing Plan and Facility Benefit Assessment, which is updated annually with community input.

3. Neighborhood Element: In the Black Mountain neighborhood the configuration of open space and low density residential development has been reconfigured in response to the deletion of "J" Street. In the northeastern area of the Black Mountain neighborhood designated for residential development, all development has been designated outside the Hillside Review Overlay Zone. The density permitted in this area is reduced from the July 1991 draft Plan by approximately one-half. In the Ridgewood neighborhood, the proposed pedestrian bridge over Black Mountain Road has been deleted.

4. Commercial and Industrial Elements: The previous draft recommendation to apply the Community Plan Implementation Overlay Zone (CPIOZ) to all commercial sites and the industrial site has been deleted.

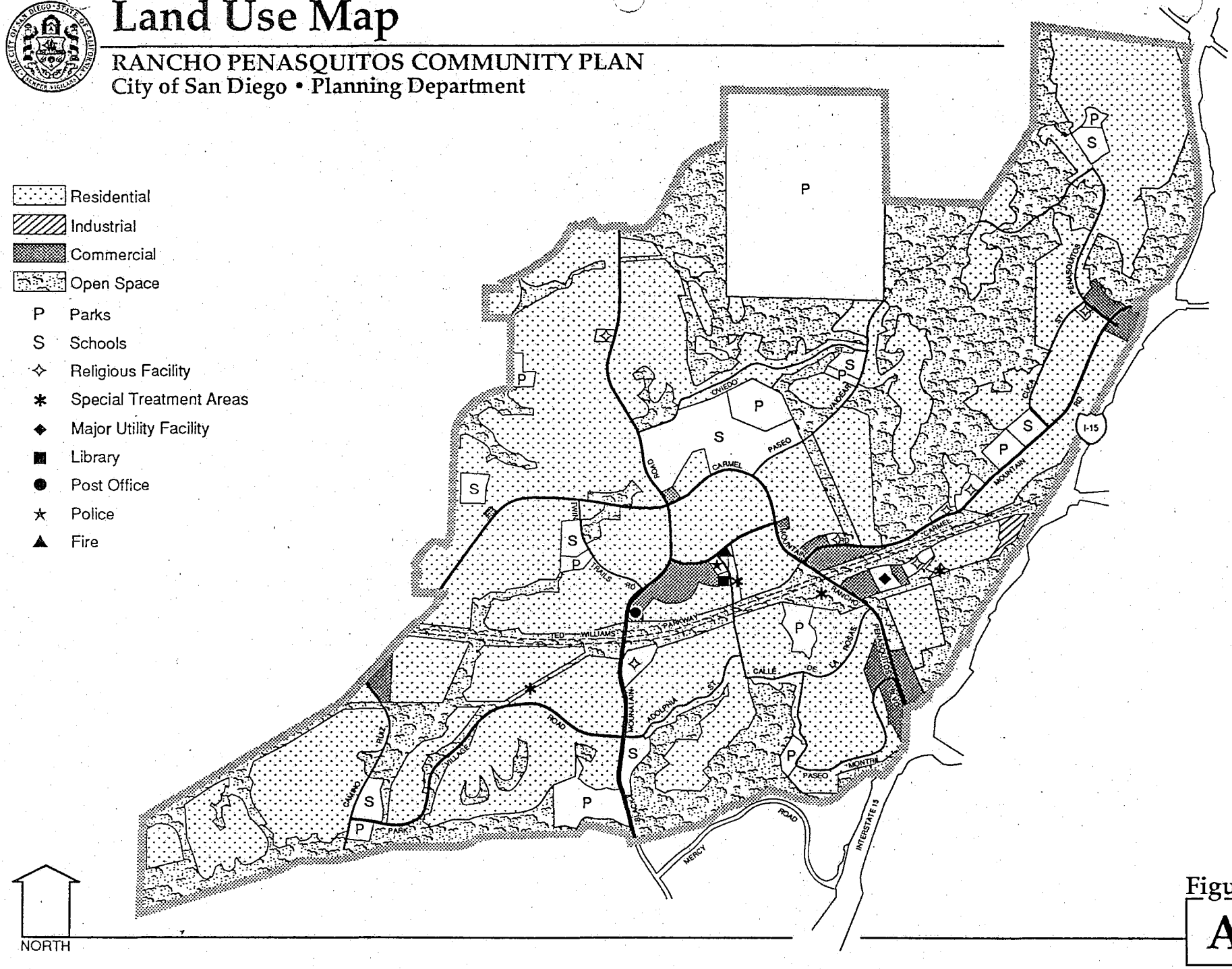
5. Open Space and Resource Management Element: The policies and implementation sections have been amended to include language which recommends retaining the larger, interconnected open spaces in the community as wildlife habitat, and encourages the use of isolated open space with reduced biological value for moderate impact activities. In addition, vernal pools and associated landforms/watersheds are also protected.

6. Existing Conditions data has been updated to reflect the latest information regarding build-out and progress in completing public facilities.

Land Use Map

RANCHO PENASQUITOS COMMUNITY PLAN

City of San Diego • Planning Department



Figure

A

STATE OF CALIFORNIA PETE WILSON, *Governor*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

RECEIVED
MAY 6 1992
DEVELOPMENT AND ENVIRON. PLANNING

May 04, 1992

JANET MYERS
CITY OF SAN DIEGO
202 C STREET
SAN DIEGO, CA 92101

Subject: RANCHO PENSAQUITOS COMMUNITY PLAN UPDATE
SCH # 91061052

Dear JANET MYERS:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call Tom Loftus at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

Christine Kinne

Christine Kinne
Acting Deputy Director, Permit Assistance

0322k

STATE OF CALIFORNIA — RESOURCES AGENCY PETE WILSON, Governor

DEPARTMENT OF PARKS AND RECREATION

Southern Region Headquarters
8885 Rio San Diego Drive, Suite 270
San Diego, California 92108
(619) 237-7961

May 4, 1992

Mr. Lawrence Monserrate
Environmental Analysis Section
Development Environmental
Planning Division
City of San Diego
202 "C" Street, Mail Station 4C
San Diego, California 92101

Dear Mr. Monserrate:

Rancho Penasquitos, Community Plan Update (SCH No. 91061052)

The California Department of Parks and Recreation, Southern Region Headquarters, has reviewed the referenced document which has implications for Los Penasquitos Marsh Natural Preserve (a unit of Torrey Pines State Reserve), that forms the downstream end of the Penasquitos, drainage. Overall, the EIR presents an adequate description of existing conditions, potential impacts and possible mitigation measures.

Our predominant concerns about the update are the potentially significant impacts on: biology, landform alteration, land use, hydrology and sediment/erosion dynamics, growth-inducement, and cumulative changes. Many of the proposed mitigation measures are appropriate and would reduce impacts to a non-significant level. Our specific comments on the EIR follow:

1. The Traffic Circulation Section proposes several roadway improvements as well as an option to not construct Camino Ruiz across Penasquitos Creek Canyon. Eliminating this connection preserves significant coastal sage scrub and other sensitive habitat/species and retains the integrity of the canyon. These benefits are offset by impacts to traffic circulation. Because the biological and visual losses would be permanent, and there are measures that could reduce traffic demand or increase efficiencies in the future, we support the alternative to not construct the Camino Ruiz connector section.

2. Air quality concerns are addressed in the proposed update by reducing the permitted development and, thereby, the total vehicle use. The air quality impact attributable to not connecting Camino Ruiz is addressed by the proposed the adoption of mitigation measures. Additional traffic system management incentives should be pursued to further reduce total vehicle use and polluting emissions.

3. The proposed plan should include an Industrial Land Use Element, but the most appropriate finding should be to utilize existing industrially-zoned land for the purpose of R.V./ministorage uses. Currently designated open space should remain so to serve as sites for future recreational or similar uses.

4. An analyses must be completed to determine the proposed plan's consistency with the Resource Protection Ordinance: the Community Plan must be revised to reflect the intent of that Ordinance.

5. Many significant biological impacts would occur under the existing Community Plan. The proposed plan includes mitigation measures that we believe are necessary to reduce development impacts.

   Maintaining viable habitats and linkages between the project area and Los Penasquitos Lagoon and Marsh are critical to the continued biological health of both areas. Appropriate mitigations for biological impacts include: elimination the connection of Camino Ruiz, specific protective language for the vernal pools, conditions to require maximum (optimum) preservations of sensitive habitats; reduction of the development/extension of Paseo Valdear, and maximization of wildlife habitat linkages.

6. Landform impacts can best be minimized by adopting alternative land use plans for the Black Mountain area. These alternatives including extending Black Mountain Park to incorporate the upper slopes, clustering developments, not extending Paseo Valdear, and not re-zoning open space to accommodate commercial uses.

7. Hydrology and water quality characteristics are important for the proper functioning of Los Penasquitos Lagoon. Project development could increase surface runoff, erosion and sedimentation. The lagoon has sustained and continues to receive substantial sedimentation that degrades salt marsh and channel habitats. The proposed plan suggests alternatives to reduce grading volumes, but should also include requirements that prevent runoff and sedimentation from exceeding natural (pre-development) rates. Flow detention and sediment retention ponds, reduced paved areas and similar alternatives should be considered.

The quality of runoff water should be addressed in the proposed plan through a Better Management Practices program. This could include using small, artificial wetlands to treat storm water runoff, requiring oil and grease filter traps to capture contaminated runoff from parking lots, and other techniques.

8. The adopted plan, and to a lesser extent the proposed plan, is growth inducing for the reason identified in the EIR: construction of schools within the Future Urbanizing Area will permit additional residential development to occur more easily.

The EIR addresses major issues of concern to this Department. As discussed in our response, the alternatives to the adopted plan are consistent with our suggestions for mitigating the most significant development impacts. Additional mitigation suggestions provided in this response address specific concerns that we have regarding downstream impacts to Los Penasquitos Lagoon and Marsh.

Please contact Mr. William E. Tippets, Senior Resource Ecologist, at the above address or phone (619) 237-7252 if you wish to discuss our response.

Sincerely,

Kenneth B. Jones
Regional Director

cc: Los Penasquitos Lagoon Foundation
P.O. Box 866
Cardiff, California 92007

Department of Parks and Recreation
Mr. Richard G. Rayburn, Resources Protection Division
Mr. William V. Fait, La Costa District

San Diego Biodiversity Project
P.O. Box 1944 Julian, CA 92036

May 25, 1992

City of San Diego
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Attn: Ms. Janet Myers
Re: Rancho Penasquitos Community Plan Update

Dear Ms. Myers,

Thank you for the opportunity to comment on the above project. We have several concerns regarding impacts to sensitive biological resources outlined below:

1) We support the planning department's proposal to aquire an additional 240 acres adjacent to Black Mountain Regional Park for inclusion in the park. Presently, proponants of the San Dieguito River Valley Park are discussing options for the placement of wildlife corridors through large land holdings in the Urban Reserve towards Black Mountain, Del Mar Mesa, and Penasquitos Canyon. Any acquisition and protection of lands in this area are important.

However, the development of land on either side of the proposed Paseo Valdear will seriously compromise the integrety of the Black Mountain biological system. Land south and east of this road will be isolated from that protected in the regional park, greatly reducing its value to wildlife. At least one large corridor must be protected to maintain the connection of these lands. The elimination of Paseo Valdear as a through road in the community plan would help accomplish this goal. Remaining details are best worked out at the project level.

2) Several actions must be accomplished to allow for wildlife movement and protection in remaining open areas of the Penasquitos Creek and Parkview Neighborhoods. One; the corridor connecting eastern Penasquitos Canyon Preserve with Del Mar Mesa and Deer Canyon to the north must remain open. To accomplish this, a bridge structure must be constructed at the terminus of the "Camino Ruiz Canyon" and Park Village Road. As the Penasquitos Creek Neighborhood is built out, increasing traffic volumes on Park Village Road will cause numerous wildlife fatalities because of the "at grade" crossing. A bridge at this location with a revegetated underpass will allow for uninhibited wildlife movement. This could be accomplished through mitigation for the loss of a wildlife corridor elsewhere in nearby communities.

If at all possible, the school proposed for the mouth of the "Camino Ruiz Canyon" should be moved to a location within the Penasquitos Creek Neighborhood.

The alignment of Camino Ruiz crossing Penasquitos Canyon and north through the "Camino Ruiz Canyon" must be dropped as an alternative. This road would cause severe biological impacts to both canyons, as well as completely eliminating the wildlife corridor to Del Mar Mesa and Deer Canyon.

The remaining eighty acres of undeveloped land in the Penasquitos Creek Neighborhood should remain undeveloped, as much of this project site (Vista Alegre) is severely constrained by sensitive habitats and species. A portion of the site has been cleared of vegetation, and development of this area would cause less impacts, but buffers between this area and the remainder of the site and the CalTrans Preserves must be left in place to minimize the pressure of an increased number of humans in the area. At this point, the wildlife corridor passes directly through the undisturbed portion of the Vista Alegre project site and on to the CalTrans Preserves and Deer Canyon. The protection of the undisturbed portion of the Vista Alegre site is critical to the continued viability of this corridor.

Sensitive resources not accounted for in the Vista Alegre Draft EIR include the Orcutt's brodiaea (Brodiaea orcuttii) and the San Diego fairy shrimp (Branchinecta sandiegensis). Both of these species, along with the abundant patches of San Diego mesa mint (Pogogyne nudiuscula) in the SDG&E easement would be negetively impacted by nearby increased human presence. As further information, the San Diego fairy shrimp is under consideration for listing as an endangered species by the US Fish and Wildlife Service. An emergency petition was submitted by the San Diego Biodiversity Project in January this year.

We appreciate the steps taken by the planning department to minimize impacts to sensitive habitats, species, and wildlife movement corridors, and we hope the above recommendations will help in the creation of a balanced final document.

Sincerely,

David Hogan

David Hogan, Coordinator

SDSU

DEPARTMENT OF BIOLOGY
COLLEGE OF SCIENCES
SAN DIEGO STATE UNIVERSITY
SAN DIEGO CA 92182-0057

(619) 594-6767

Ms. Janet Myers
Planning Department
Development and Environmental Planning
202 C Street, Mail Station 4 C
San Diego, CA 92101

Dear Ms. Myers:

I am writing to comment on the DEIR for the Rancho Penasquitos Community Plan Update. I applaud the recommendation to delete the connection of Camino Ruiz across Penasquitos Canyon. The substantial adverse environmental impacts of such a roadway have been discussed thoroughly, and I will add no further comment at this time. However, the elimination of the cross canyon road means that the proposed northward extension of Camino Ruiz between the Penasquitos Creek and Parkview Neighborhoods is no longer part of a regional transportation network. Its prime function will be to provide access to proposed SR 56 for these two neighborhoods, because much of the open land to the west of the proposed Camino Ruiz/SR 56 interchange is part of the Caltrans Vernal Pool Preserve. Alternative access planned approximately 1 mile to the east, renders this interchange an expensive redundancy.

Furthermore, construction of this portion of Camino Ruiz will destroy an important wildlife corridor between Deer Canyon and the Caltrans Vernal Pool Preserve on the north and Penasquitos Canyon to the south. To my knowledge, no other such corridor exists between this area and I-15. Consequently, it serves all of the eastern end of the Penasquitos Preserve. The eastern end of the canyon could become "dead" for larger animals and animal movements would become concentrated in corridors farther west, some of which are smaller and less desirable. Elimination of this corridor will also directly impact the eastern portion of the Caltrans Vernal Pool Preserve by severing one of its major connections with Penasquitos Canyon. This preserve is part of a county-wide program to preserve representative examples of vernal pools, Mima mound topography, and associated slopes and canyons. For the reasons cited above, as well as those stated in the DEIR, I concur with the

recommendation that the portion of Camino Ruiz north of Park Village Road be deleted from the community plan.

I am not certain of the appropriate time or place to make recommendations regarding enhancement of the existing wildlife corridor which has been compromised by previous planning decisions. The Penasquitos Creek Elementary School is proposed for the lower end of the corridor itself, and Park Village Road creates an exceedingly hazardous grade crossing for the animals. The corridor to the north of Park Village Road and between the school and residential development should be screened with stout, high fencing and plantings of dense, preferably native, shrubs. In Figure 13 a pedestrian pathway is sited within the lower, most constricted portion of this corridor. This conflicts with the maintenance of this as an active corridor for large vertebrates and could be dangerous for animals and humans alike. The pathway should be eliminated or rerouted. Enlarging the culvert to create a below grade animal crossing ought to have been required as part of the approval process of nearby developments. In any case, the value of this wildlife corridor to both the Caltrans Vernal Pool Preserve and the Los Penasquitos Canyon Preserve needs to be recognized in the community plan, and maintenance of this as an effective wildlife corridor should be a high priority.

In addition, the plan needs to state explicitly the regional importance of the vernal pool habitat on the nearby mesa to the southwest of the proposed intersection of Camino Ruiz and SR 56. These pools abut the Caltrans Vernal Pool Preserve and their preservation should be a high priority. The inclusion of the pools in open space, where appropriate, would augment the wildlife corridor to the east, as well as preserve the pools themselves.

The recommendations for mitigating impacts of development in the Black Mountain area by clustering, elimination of portions of Paseo Valdear, and the "graded" use of open space, are innovative and ought to be included in the final plan (Sections IV D and IX 2 d and 4 c). Cut and fill slopes of 80 and 180 feet, respectively, are unacceptable, and to me represent an admission that wise planning is not within our grasp and mountainsides are unprotected. Such alterations of natural landforms will have far reaching negative impacts on vegetation, wildlife, watersheds, and views. The impacts on views will extend well beyond the community plan boundaries, and the regional as well as local impacts are rightly noted.

Sincerely,

Ellen T. Bauder

Adjunct Professor of Biology

San Diego County Archaeological Society, Inc.

Environmental Review Committee
P.O. Box A-81106 San Diego, CA 92138

March 28, 1992

To: Ms. Janet Myers
Development and Environmental Planning Division
Planning Department
City of San Diego
202 C Street, Mail Station 4C
San Diego, California 92101

Subject: Draft Environmental Impact Report
Rancho Peñasquitos Community Plan Update
DEP No. 89-1222

Dear Ms. Myers:

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

Based on the information contained in the DEIR, we concur in the proposed approach to treatment of cultural resources by future projects.

Thank you for including SDCAS in the distribution of this DEIR for review and comment.

Sincerely,

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

cc: SDCAS President
file

GATZKE, MISPAGEL & DILLON
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MARK J. DILLON
PARTNER

May 1, 1992

Lawrence C. Monserrate
City of San Diego
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, California 92101

By Telecopier, Federal Express and Messenger

Re: *Comments of Newland California on the Draft Environmental Impact Report (SCH No. 91061052)*

Dear Mr. Monserrate:

Newland California has asked us to submit written comments on its behalf to the Draft Environmental Impact Report ("Draft EIR") for the proposed Rancho Peñasquitos Community Plan Update. The enclosed comments will require a written response from the City of San Diego in accordance with the California Environmental Quality Act ("CEQA") (Pub.Res.Code §§21000 *et seq.*) and the CEQA Guidelines (14 Cal.CodeRegs. §§15000 *et seq.*).

The enclosed comments identify numerous deficiencies with respect to the legal adequacy of the Draft EIR. In light of those deficiencies, we believe that the Draft EIR requires significant revision and recirculation.

If you have any questions regarding the enclosed comments, or if we can provide you with any additional information, please do not hesitate to contact me or James M. Delhamer at (619)455-1230.

Very truly yours,

Mark J. Dillon
of
Gatzke, Mispagel & Dillon

MJD:tlf
Enclosure
cc: James M. Delhamer, Newland California
Arthur B. Shurtleff, Newland California
Lyle F. Gabrielson, Rick Engineering Company

COMMENTS TO THE DRAFT EIR FOR THE PROPOSED
RANCHO PEÑASQUITOS COMMUNITY PLAN UPDATE
(DEP No. 89-1222; SCH No. 91061052)

1.0 DRAFT REPORT DATED MARCH 18, 1992

Because the Draft Report (dated March 18, 1992) is part of the Draft EIR, and because that report will be "finalized" in response to comments on the Draft EIR, we request that City staff separately respond to the following comments:

1.1 At page 1, first paragraph, City staff incorrectly states that the Rancho Peñasquitos Community is "east" of Interstate 15. The community is west, not east, of Interstate 15.

1

1. Location is noted and corrected in FEIR.

1.2 At page 1, second paragraph, City staff characterizes the "purpose" of the proposed project as addressing the "public facility needs" of the community. This project description conveys the misleading impression that the Draft EIR will address the public facilities needed to complete build-out of the community. In fact, the Draft EIR does not adequately identify and describe the public facilities needed for the community. In the nearly five years it has taken for City staff to prepare the proposed Update and related Draft EIR, almost $100 million dollars of new public improvements in the Rancho Peñasquitos Community are either completed, under construction or guaranteed for completion through some contract mechanism (development agreement, *etc.*). The Draft EIR must identify and describe the many public improvements provided in the community since City staff first began the process of updating the Rancho Peñasquitos Community Plan. Attached to these comments is a list describing the specific public improvements, the current status of each improvement and the approximate amount of money committed to each improvement. After discussing the existing "physical" conditions with respect to the new public improvements, the Draft EIR must then identify and discuss the need for additional public improvements during final build-out of the community. Please respond by revising the Draft EIR to add this significant new information.

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2. The EIR states the purpose of the community plan update (the "proposed project") is mainly to address the public facility needs of the community. The purpose of the EIR is not to identify the public facilities needed to complete build-out of the community.

1.3 At pages 2 and 3, the Report summarizes the potentially significant effects resulting from implementation of the proposed Update. This summary is misleading because it implies that certain statements are supported by technical studies which are part of the Draft EIR. In fact, we contacted City staff (Janet Myers) to obtain copies of the technical studies which we assumed would be part of the "appendices" to the Draft EIR. We were told that the Draft EIR does not include any technical appendices. In light of that fact, the following unsubstantiated statements, at pages 2 and 3, should be deleted from the Report:

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3. There is no implication that technical appendices are part of the EIR. CEQA states an EIR is not a technical document that can be prepared only by a registered professional (Guideline Sect. 15149 (b)). The specified statements are substantiated by qualified City staff and technical reports completed for projects within the community and explain the effects of the proposed project on the environment.

1.3.1 "Development of residential neighborhoods and roads according to the land use plan proposed for the Black Mountain area would result in fragmentation of habitat."

1.3.2 "In the Peñasquitos Creek and Parkview Neighborhoods, implementation of the plan would result in the direct loss of vernal pools; this is a significant impact because of the magnitude of the regional loss of this resource."

1.3.3 "In addition, in these two neighborhoods, the potential disturbance of a major wildlife movement corridor would have a significant impact on wildlife."

1.3.4 "The road would result in the loss of native vegetation in a tributary canyon that is used as a wildlife corridor."

1.3.5 "The new road would be visible from the park preserve and would attract much visual attention."

1.3.6 "The encroachment of development on such a prominent landmark as Black Mountain and the loss of another important canyon area contributes incrementally to the reduction in visual diversity in the City as a whole."

1.4 At page 2, the Report contains inaccuracies regarding the description of slopes. The engineering data indicates that fill slopes are 120 feet -- not 180 feet; and cut slopes are 95 feet -- not 80 feet. 4

1.5 At page 2, fifth paragraph, the Report refers to development "encroachment" on Black Mountain. In fact, no development is proposed on or within 1,800 feet (1/3 of a mile) of the peak of Black Mountain. Revision is required. 5

1.6 At page 3, fifth paragraph, City staff suggests that no attempt has been made to apply the Resource Protection Ordinance to development proposals in the community. In fact, City staff has attempted to apply the Resource Protection Ordinance to both Vista Alegre and Montaña Mirador -- despite the fact that both of those proposed projects are *exempt* from that ordinance. Revision is required to point out that Vista Alegre and Montaña Mirador are exempt from the Resource Protection Ordinance. Please respond. 6

1.7 At page 5, the Report refers to a clustered development alternative "rather than spreading over the upper slopes of Black Mountain." This statement is too subjective. Revision is required. (*See,* ¶1.5, above.) 7

1.8 At page 8, the Report lists the public agencies, organizations and individuals who received a copy or notice of the Draft EIR and who were invited to comment on its accuracy and legal sufficiency. City staff, of course, is aware that there are three areas remaining to be developed in the Rancho Peñasquitos Community. Newland California is the owner of two sites proposed for residential development (Vista Alegre and Montaña Mirador). However, Newland California is not included on the distribution list for the Draft EIR, and Newland California did not receive actual notice of the Draft EIR. Certainly,

4. The EIR is consistent with the general planning level of the community plan and is not intended to be project-specific. The information regarding manufactured slope heights and gradients was included here to provide a general picture of the magnitude of landform alteration that would be required to implement the road alignments shown in the draft plan.

5. The EIR does not take a position regarding a line demarking the "bottom" of a mountain. Development is proposed on the slopes of the topographic feature identified a Black Mountain.

6. The EIR states that the Development Suitability Analysis required by Council Policy 600-40 for all long-range land use plans was not conducted by the Long Range Planning Division. The purpose of the analysis is to determine whether future development proposals, consistent with the long range plan, would be able to obtain a Resource Protection Ordinance permit if required. It is not relevant to the EIR to include whether specific projects are subject to RPO.

7. The community plan shows residential use designations on the upper slopes of Black Mountain; at the community plan scale it cannot be determined precisely how close to the peak development would be allowed. The intent of the alternative is to limit the extent of development and avoid wrapping development around the upper slopes as is shown in the plan.

Newland California -- a property owner in the community -- could have been included on the distribution list. In the future, Newland California requests that it receive actual notice of any proposed action to be taken with respect to the Draft EIR for the proposed Update.

1.9 At page 9, the Report incorrectly states that "[c]opies of . . . technical appendices may be reviewed in the office of the Development and Environmental Planning Division." Because the Draft EIR does not include any technical appendices, this statement should be deleted. Please respond.

2.0 DRAFT EIR -- INTRODUCTION

2.1 At page 2, first paragraph, the Draft EIR refers to the proposed Update as the update to the adopted 1978 Peñasquitos East Community Plan. No mention is made of the history and background leading up to adoption of the plan. No mention is made of the 1987 Peñasquitos East Community Plan Update. Revision is required to provide significant, relevant background concerning the Rancho Peñasquitos Community Plan.

2.2 At page 2, first paragraph, the Draft EIR refers to previously prepared EIRs, as well as other technical data, which are supposedly "incorporated by reference." The Draft EIR does not comply with the incorporation by reference requirements of the CEQA Guidelines (Guidelines §15150). Revision is required.

2.3 Neither the "summary" (*i.e.*, Draft Report dated March 18, 1992) nor the "introduction" make any attempt to summarize areas of controversy, mitigation measures or unresolved issues. CEQA requires that an EIR address those issues in the summary section of an EIR (Guideline §15123). This significant new information should be added to the Draft EIR.

3.0 ENVIRONMENTAL SETTING

3.1 At page 2, second paragraph, the Draft EIR identifies Rancho Peñasquitos as a 65,000-acre community. There are approximately 6,500 acres in this community.

3.2 At page 4, first paragraph, the Draft EIR makes reference to a "vernal pool habitat . . . located on the mesa north of Los Peñasquitos Creek and east of the CALTRANS Vernal Pool Preserve, . . ." This reference is to Newland California's Vista Alegre site. City staff is aware that no competent biological information has been presented at this time to confirm the presence or absence of vernal pools within the proposed development area of Vista Alegre. City staff is also aware that they have not yet disclosed the standards or criteria that they will seek to employ in defining "vernal pools." In short, no substantial evidence exists to support the statements made in the Draft EIR that "vernal pools" exist within the proposed development area of Vista Alegre. Unless and until a competent biology survey confirms the presence or absence of vernal pools within the proposed development areas of Vista Alegre, City staff should not publicly circulate an environmental document which gives the misleading impression that a particular area contains vernal pools. Revision is required to delete *all* references to the existence of vernal

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8. In general, the distribution list for draft environmental documents includes public agencies rather than private enterprises. In compliance with CEQA, the distribution of the Draft EIR was noticed in a local newspaper, *The Daily Transcript*.

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9. Conclusions corrected to reflect that the EIR is not accompanied by a Mitigation Monitoring and Reporting Program or technical appendices.

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10. The EIR briefly summarizes the history leading to the current proposed project. The purpose of this EIR is to disclose the environmental impacts of the currently proposed community plan update. The project description section of the EIR gives adequate detail about the proposed plan to provide a frame of reference for the reader. If further historical information or greater detail about the project is required, the reader is directed to previous documents incorporated by reference in the EIR, or to the draft community plan.

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11. FEIR includes the State Clearinghouse Number of the EIR for the Penasquitos East Community Plan, as required by CEQA Guidelines, on page 2 (Guideline Sect. 15150).

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12. There were no apparent areas of controversy to disclose and no unresolved issues relating to the community plan at the time the draft EIR was distributed. In addition, mitigation measures are not available at this level of planning detail. There is no new significant information related to these issues.

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13. FEIR reflects 6,500 acres in the community.

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14. The EIR refers to vernal pools which occur in that particular area of the community and is not specifying a particular ownership or development. Vernal pools have been identified within the San Diego Gas & Electric easement located in that area. In addition, Newland's biological surveys state that vernal pools occur within the SDG&E easement and are available for public review in the City Planning Department.

pools. If the requested revision is not made, we ask that City staff disclose all of the technical biology surveys that they relied upon to support the statements contained in the Draft EIR.

3.3 Our request for biological data to confirm the presence or absence of "vernal pools" within the proposed development areas of Vista Alegre is consistent with a written request the City received from the U.S. Fish and Wildlife Service. In a letter dated October 17, 1991, the Service suggested that the City confirm the presence or absence of vernal pools within the proposed development areas of Vista Alegre. Please respond by providing the biological data relied upon by the City in the Draft EIR.

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15. Refer to response No. 14.

3.4 At page 6, second paragraph, the Draft EIR makes statements about the number of residential units "allowed" under both the adopted plan and the proposed Update. The numbers are inaccurate. They do not represent any numbers developed during the 5-year effort to prepare the proposed Update. Please revise by accurately disclosing the residential units "allowed" under each plan.

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16. The EIR has been revised to accurately show the maximum number of dwelling units that would be permitted in the Black Mountain area according to the adopted plan and mid-range density ordinance, and according to the draft community plan. (page 6)

3.5 The Draft EIR should also explain why it is inconsistent with the text at page 28 of the Draft Rancho Peñasquitos Community Plan, which states that, "within the portion of Montaña Mirador available for development, no more than 575 units will be constructed."

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17. Refer to response No.16.

3.6 At page 6, second paragraph, the Draft EIR should be revised to reflect the fact that the adopted plan, as revised, allows 647 units on the 635-acre Montaña Mirador site -- not 275 units.

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18. Refer to response No.16.

3.7 At page 6, second paragraph, the Draft EIR should correctly state that the proposed Update allows 575 units on the Montaña Mirador site -- not 470 units.

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19. Refer to response No.16.

3.8 At page 6, fifth paragraph, the Draft EIR contains a brief description of the Los Peñasquitos Canyon Preserve. This section should be revised to disclose the fact that over 2,000 acres of property was dedicated to the City by Newland California, as successor in interest to Genstar, for inclusion in the Preserve in return for development rights under the adopted 1978 Peñasquitos East Community Plan.

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20. This information is not considered germane to the description of surrounding land uses.

4.0 PROJECT DESCRIPTION

4.1 At page 9, the Draft EIR discusses the "project description"; however, this section omits information required by CEQA, the Guidelines and relevant case law. For example, the current project description section fails to describe the public facilities and infrastructure in Rancho Peñasquitos which are either completed, under construction or guaranteed for completion, such as roads, traffic improvements, parks, recreational centers, schools and libraries. This type of analysis would certainly be consistent with the proposed Update's stated "purpose," which is "mainly to address the public facility needs of the community." Revision is required to add significant new information concerning the new public improvements in the community since 1987 -- along with an analysis of their capacities and current levels of service.

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21. The project description section is intended to describe elements of the proposed plan, not the public facilities and infrastructure which exist in the community. Information relating to traffic improvements is in Section IV.A of the EIR because there would be significant impacts on traffic circulation with implementation of the plan. No potentially significant environmental impacts were identified in relation to public facilities in the community. Therefore, the EIR does not discuss this issue.

4.2 At page 9, the existing "project description" section fails to describe the relevant background leading to adoption of the 1978 Peñasquitos East Community Plan. The section also fails to make any reference to the 1987 Peñasquitos East Community Plan Update. In short, there is no attempt to provide the public or the decisionmakers with any factual information about the project background. Revision is required. (*See,* ¶2.1, above.)

4.3 Contrary to the stated purpose of the proposed Update, the Draft EIR fails to address the current "public facility needs" of the Rancho Peñasquitos Community. Instead, the Draft EIR focuses upon City staff's principal intent -- which appears to be the planning for development of the remaining 15 percent of the community. Because of this analytical approach, the existing project description section is inaccurate, incomplete and in violation of applicable law. Revision is required.

4.4 The existing "project description" section does not contain a detailed, preferably topographic, map showing the precise location and boundaries of the proposed project -- including the proposed modifications to the adopted plan.

4.5 The existing "project description" section does not contain a *statement of objectives* sought by the proposed project. CEQA, of course, requires that the project description section of an EIR contain a statement of objectives of the proposed project. A statement of objectives is particularly critical given the recent holdings in the *Goleta* cases which evaluated alternatives in light of the project objectives.

4.6 The existing "project description" section does not contain a statement describing the intended uses of the EIR, including a list of agencies that are expected to use the EIR in their decisionmaking, and a list of the approvals (permits) for which the EIR will be used. *See,* Guidelines §15124(d). Revision is required.

5.0 ENVIRONMENTAL ANALYSIS

5.1 In general, the existing "environmental analysis" section is extremely generic and subjective. The section does not appear to be based upon any technical biology, visual, or hydrology/water quality studies prepared for the proposed Update. The existing biology section, in particular, seems to be based almost entirely upon anecdotal, speculative, incomplete and inaccurate information. In short, the "environmental analysis" section must be rewritten to add new, objective, and quantitative information.

5.2 Each impact analysis section (*e.g.,* traffic, air quality, land use, biology, landform alteration/visual quality, hydrology/water quality and noise) should begin with a complete citation to the technical study or studies relied upon, and an appropriate appendix reference for each study utilized in the preparation of the Draft EIR.

5.3 At page 13, the Draft EIR refers to the traffic methodology utilized by the City Engineering and Development Department. This methodology should be explained in detail.

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22. Refer to response No.10.

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23. The purpose of the draft community plan is to resolve deficiencies in the previous plan. The EIR addresses environmental impacts associated with implementation of the proposed draft community plan, not previous plans. There would be no significant environmental impacts associated with implementation of the proposed plan in the area of public facilities.

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24. The graphics are considered adequate for this level of planning.

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25. The objective of the proposed project is an update of the previously adopted community plan. This is stated clearly on page 9 of the EIR, and following pages. Further, the EIR describes in detail the elements of change involved in the update. The document is considered to be in compliance with CEQA and relevant case law.

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26. The subject block of the EIR conclusions indicates that the purpose of the EIR is for City Council approval of a "COMMUNITY PLAN AMENDMENT TO THE CITY OF SAN DIEGO PROGRESS GUIDE AND GENERAL PLAN, and related REZONES." Further on page 1, Introduction, first paragraph, the EIR states " This is an informational document intended for both the decision maker and the public, and, as such, represents relevant information concerning the proposed update to the Penasquitos East Community Plan... associated rezonings, and an amendment to the City of San Diego Progress Guide and General Plan to delete the extension of Camino Ruiz across Los Penasquitos Canyon". Literal compliance with CEQA is not required; no restatement of this information in the Project Description section of the EIR is considered necessary. There are no responsible agencies that would be using this EIR.

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27. The EIR was prepared by qualified City staff, and the level of analysis is consistent with the generalized level of planning being conducted at this time.

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28. All sources are correctly cited in the document. No revision required.

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29. The information in an EIR shall include summarized technical data...and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public (CEQA Guidelines Sect. 15147). The details of traffic study methodology can be obtained from the City Engineering and Development Department and is not considered germane to the EIR.

5.4 At page 13, the Draft EIR states that the City Engineering and Development Department "assumed" a density of 2.5 dwelling units per acre in the Future Urbanizing Area. What is the basis for that assumption? Please respond. 30

5.5 Figure 6, at page 14, illustrates the average daily trips ("ADT") "based on build-out of the community with development according to the community plan update." Because the Draft EIR incorrectly identified the allowable development densities under the proposed Update, City staff should explain what development densities were utilized in preparing Figure 6. Figure 6 should also contain a reference to the "source" for the ADT information. 31

6.0 LAND USE

6.1 At pages 26 and 27, the Draft EIR discusses the desire of the residents in the community to include an Industrial Element in the proposed Update to allow for a recreational vehicles/mini-storage warehouse facility *in the community*. However, the Draft EIR concludes that a potentially significant "visual quality" impact may exist if the proposed facility were permitted. This conclusion is not substantiated. 32

6.2 At page 29, the Draft EIR concludes that "significant" visual impacts resulting from the proposed facility could be "mitigated" by locating it "in the Sabre Springs industrial area." In essence, then, the Draft EIR states that *another* community should provide the proposed facility for the Rancho Peñasquitos Community. Common sense suggests that the residents in Peñasquitos would more likely park their recreational vehicles on local streets -- as they do now -- rather than drive to *another* community to park their vehicles. Certainly, the Draft EIR should *first* consider other more obvious and reasonable mitigation measures -- such as landscaping and buffering techniques for the site identified *within* the community. These mitigation measures should be included and analyzed to determine if the unsubstantiated references to "visual" impacts can be mitigated to below a level of significance. 33

6.3 At page 29, the Draft EIR concludes that the proposed Update involves a potentially significant land use impact "if the future development plans [such as Vista Alegre and Montaña Mirador] are consistent with the Rancho Peñasquitos Community Plan, but are inconsistent with the adopted resource protection policies and ordinances." The Draft EIR should disclose that *both* Vista Alegre and Montaña Mirador are exempt from the Resource Protection Ordinance. As a result, no potentially significant land use impact exists. 34

7.0 BIOLOGICAL RESOURCES

7.1 This discussion should provide reference to the technical biological study relied upon by City staff, and provide an appropriate appendix reference to that study. If City staff did not prepare a biology study for the proposed Update, the Draft EIR should disclose that fact. If the study was not prepared, City staff should prepare the appropriate biological study for the proposed Update, revise the Draft EIR to include the results of that study and recirculate the document. If City staff is relying upon the biology study used for the 1978 35

30. The Draft Mid-County Transportation Study Interim Report (SANDAG April 1992) states that for the Mid-County region, SANDAG staff developed a focused subarea transportation model. Dual land use assumptions were used for the FUA where no current land use plan is in effect. One scenario used 2.5 dwelling units per acre. That number was derived from the North City Sphere Study. The 2.5 du/acre assumption was used by E&DD because it is a more conservative assumption than using the current zoning which permits a maximum of one du/acre.

31. Figure 6 was prepared by the City Engineering & Development Department, the source of all the community plan traffic analyses and recommendations. It was based on current information provided by the Long Range Planning Division to E&DD. It is assumed that E&DD was provided with accurate information and the illustration in Figure 6 is accurate. The EIR Project Description section has been revised to reflect consistent densities.

32. As stated in the EIR on page 29, a potentially significant visual impact could occur if the site is converted from open space designation to industrial designation. On page 42 the EIR states the impact could occur if the intended use of the highly visible site, a parking/storage facility, is not sensitively designed and screened. The document concludes the impact could occur and it is likely to be able to be mitigated.

33. At this generalized level of planning and analysis, only possible mitigation methods are discussed; specific measures cannot be committed to with a long range planning policy, such as a community plan. The EIR presents possible measures for mitigating a potentially significant impact on visual quality which may occur if appropriate design is not used.

34. The EIR presents analysis of a proposed community plan, not individual projects. It is not intended to, and does not focus on Newland's private development projects.

As stated in the EIR, the development suitability analysis for long range plans which is required by Council Policy 600-40 was not conducted by the Planning Department. Future projects may or may not be subject to the RPO; this EIR is not making a determination of which projects are subject to the RPO.

35. The biology study conducted for the previous EIR is incorporated by reference. Field reconnaissance surveys were conducted by qualified staff in preparation of this EIR.

adopted plan, City staff should prepare an updated biology study, revise the Draft EIR to include the results of the updated biology study and recirculate the document. Please respond.

7.2 At page 31, first paragraph, the Draft EIR makes the unsubstantiated statement that, "[b]ecause the community is 85 percent built, biological resources have been depleted substantially." No biological report is offered in support of this statement. In fact, biological resources are not "substantially" depleted. Approximately one-third of the Rancho Peñasquitos Community has been, or will be, set aside for park and open space purposes. Based on this information, the sensitive biological resources have been "substantially" protected. Revision is required.

7.3 In addition, the Draft EIR fails to acknowledge that over 2,000 acres of the Los Peñasquitos Canyon Preserve were dedicated to the City by Newland California, as successor in interest to Genstar, as part of the agreement to allow development in accordance with the adopted plan. Revision is required to add this information.

7.4 The Draft EIR fails to acknowledge that permissible development on the 635-acre Montaña Mirador site (Black Mountain Neighborhood) has been reduced by 67 percent from the original entitlement (from 1724 to 575 units), and that plans for development of Montaña Mirador have been in the planning process for nearly five years.

7.5 At page 31, third paragraph, the Draft EIR incorrectly describes the Los Peñasquitos Canyon Preserve. The Preserve is approximately 3,000 acres -- not 50,000 acres.

7.6 At page 31, third paragraph, the Draft EIR fails to provide relevant background information regarding acquisition of the Los Peñasquitos Canyon Preserve. Revision is required.

7.7 At page 31, fourth paragraph, the Draft EIR discusses the southern part of the community -- concluding that the roads in the area do not currently carry large volumes of traffic and thus a "viable connection with the preserve still exists." It appears that City staff is trying to establish the existence of an "important" wildlife corridor up the Camino Ruiz Canyon from Peñasquitos Canyon. The problem, however, is that the area is blocked by Park Village Road, a park and a school. Park Village Road is projected to have at least 10,000 ADTs at build-out of the community. If City staff's alternative of eliminating the Camino Ruiz extension is accepted, additional ADTs will be added to Park Village Road -- further impeding the so-called "corridor." Please respond.

7.8 At page 33, the Draft EIR again refers to the existence of "vernal pools" within the proposed development areas of Vista Alegre. The statements are unsubstantiated. These statements should be deleted from the document.

7.9 At page 33, last paragraph, the Draft EIR states that the "loss or isolation" of "any" coastal sage scrub vegetation on Vista Alegre and Montaña Mirador "would be considered a significant impact." This statement is without precedent. We are not aware

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36. Loss of two-thirds of the existing native habitat is considered a substantial depletion of resources.

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37. Refer to response No.20.

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38. No response is required.

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39. The EIR is revised to reflect the accurate acreage of the preserve, approximately 3,400.

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40. Refer to response No.20.

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41. The EIR states as an existing condition that there is an active wildlife corridor in the same canyon where a stretch of Camino Ruiz is proposed. The corridor is still significant because Park Village Road is not being used to full capacity now; traffic volumes are low enough that the use of the corridor has not been disturbed. The EIR further states that construction of Camino Ruiz as shown in the plan would have a significant impact on the corridor. There would be a significant impact on wildlife and a potential traffic safety impact if the corridor remains intact combined with traffic volumes on Park Village Road reaching capacity levels in the future.

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42. Refer to response No.14.

43

43. The EIR addresses the proposed community plan; it does not address impacts related to specific projects in process. The EIR discloses that if development is implemented according to the proposed plan, impacts would occur to coastal sage scrub habitat that would be significant given the magnitude of loss of this vegetative community in the region. The EIR is not stating a policy of "no net loss."

of any federal, state or local agency that has adopted a "no net loss" coastal sage scrub habitat policy. If City staff is attempting to establish this "no net loss" policy, the Draft EIR should clearly identify this policy as a staff-proposed action for consideration and approval by *both* the Planning Commission and the City Council. Unless and until *both* the Commission and the Council adopt staff's proposed "no net loss" policy, it should not be used as though it were an adopted policy of the City. Please respond.

7.10 At page 35, first paragraph, the Draft EIR discusses the "importance" of wildlife corridors, and suggests that it is "important to identify the location of active corridors and to maintain suitable connections between open space." The EIR then identifies an "active corridor" in the vicinity of Vista Alegre. We are not aware of any competent biological data confirming the existence of an "active" wildlife corridor in that area. The Draft EIR should be revised to identify the biological surveys relied upon for the conclusions regarding "active" wildlife corridors. Unless there is competent biological data confirming the existence of a wildlife corridor in the vicinity of Vista Alegre, this reference should be deleted. Please respond.

44. Technical information regarding wildlife corridors in the southern part of the community has been submitted to the City. This information has been confirmed in the field by qualified staff.

7.11 At page 38, second paragraph, the Draft EIR describes the grading for Paseo Valdear as requiring "massive excavation." This statement is too subjective. The area is not being "excavated." While earth moving will take place, the proposed street has been realigned to reduce grading impacts in direct response to prior comments made by City staff. Revision is required.

45. Significant excavation is anticipated for construction of this roadway.

7.12 At page 38, fourth paragraph, the Draft EIR again refers to the loss of "vernal pools" -- without any reference to the biological data relied upon to support the statement. Please provide the biological data relied upon by City staff.

46. Refer to response No.14.

7.13 At page 38, sixth paragraph, the Draft EIR again makes unsubstantiated statements about the existence of a wildlife corridor. If these statements are not supported by competent biological surveys, the Draft EIR should be revised to either delete the statements or disclose the fact that the information about these wildlife corridors is not based upon biological surveys or studies.

47. Refer to response No.14.

7.14 At pages 39 and 40, the Draft EIR discusses the "significance" of the biological impacts and the proposed "mitigation." These sections must be rewritten in light of our comments concerning the deficiencies of the existing biology section. As a predicate to revising the Draft EIR, however, City staff must prepare the necessary biology report for the proposed Update. Please respond.

48. The draft plan is a general level land use planning policy, and the biology section of the EIR is consistent with that level of planning. The sources of information in the EIR include recent field reconnaissance surveys by qualified staff, project-specific technical reports submitted for projects in process (available for review at the Planning Department), and technical reports prepared for previous community plan EIRs. More detailed biological information will be provided for future specific project proposals.

7.15 At page 40, second paragraph, the Draft EIR again makes unsubstantiated statements about "vernal pools."

49. Refer to response No.14.

7.16 At page 40, third paragraph, the Draft EIR states that the "fragmentation of open space in the Black Mountain neighborhood would be mitigated by adoption of an alternative land use plan which eliminates the full extension of Paseo Valdear to Peñasquitos Drive." Please provide references to the traffic studies which substantiate this conclusion.

50. The issue of habitat fragmentation could not be addressed or resolved by a study relating to vehicular traffic circulation.

7.17 At page 40, fourth paragraph, the Draft EIR states that the "value" of the open space southeast of Paseo Valdear would be "significantly reduced" if that road is constructed. Please provide the biology studies relied upon to support this statement. 51

7.18 The Draft EIR should be revised to include the biological data supporting the open space "island" concept. 52

8.0 LANDFORM ALTERATION/VISUAL QUALITY

8.1 At page 40, the Draft EIR should be revised to identify the technical study relied upon in preparing the "landform alteration/visual quality" section. The study should also be included as an appendix to the Draft EIR. 53

8.2 At page 41, last paragraph, the Draft EIR contains inaccuracies regarding the description of the slopes. The engineering data indicates that fill slopes are 120 feet -- not 180 feet; and cut slopes are 95 feet -- not 80 feet. In addition, the gradient is 2:1 not 1.5:1. 54

8.3 At page 42, first paragraph, the proposed development is approximately 800 dwelling units -- not 700 units. 55

8.4 At page 42, second paragraph, the Draft EIR discusses the visual impacts of Camino Ruiz -- without acknowledging the fact that mitigation measures have been adopted at the request of City staff to minimize potential visual impacts. Please respond. 56

8.5 At page 43, first paragraph, the Draft EIR incorrectly states that Paseo Valdear "is required only to serve a single subdivision; therefore, by compacting development, the need for the extended alignment is eliminated." A quick review of a map of the community confirms that Paseo Valdear will serve the entire community by providing a useful circulation link that is currently missing. Please respond. 57

8.6 At page 43, fourth paragraph, the Draft EIR again discusses open space "islands." The Draft EIR should disclose the technical studies relied upon in support of the open space "island" concept. Please respond. 58

9.0 HYDROLOGY/WATER QUALITY

9.1 At page 44, fifth paragraph, the Draft EIR states that a potential exists for approximately 6,000 acres to be developed in the community. According to page 6 of the Draft EIR, however, approximately 1,000 acres are available for development in the community -- not 6,000. Please eliminate this inconsistency. 59

10.0 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

10.1 At page 48, the Draft EIR concludes that public school construction in the Future Urbanizing Area "induces growth by providing services and facilities, the absence of which would make future development more difficult." This section is inadequate. CEQA 60

51. A biology study was not prepared for the update of the community plan. However, a well-documented ecological principle is that road development interferes with habitat viability to a significant degree.

52. Refer to Soule, M.E. (ed.) Conservation Biology: the Science of Scarcity and Diversity, Sinauer Associates,Inc. 1986.

53. Typically technical studies are not prepared to address landform alteration and visual quality. The draft plan is prepared for general level land use planning, and the EIR is consistent with that level of planning. Future project-specific development proposals will analyze landform alteration and visual quality at a more detailed level.

54. Refer to response No.4.

55. The FEIR is revised accordingly.

56. The project referred to in the comment is not approved.

57. According to preliminary general information from the Engineering & Development Department, it appears that the loss of the Paseo Valdear extension would not have a significant adverse impact on circulation because the anticipated average daily trip volume of 4,000 could be redistributed to other roads without overloading. A final determination would be made with project-specific studies, rather than at the more generalized community planning stage.

58. Refer to response No.52.

59. The FEIR has been revised accordingly.

60. The CEQA Guidelines state the EIR must include a discussion of whether a project would have growth inducing impacts or not (Sect. 15126(g)). Neither the guidelines or the statute require analysis of whether the impact would be significant.

and the Guidelines require that an EIR state whether or not the proposed project will have *significant* growth-inducing impacts. If so, the Draft EIR should substantiate the growth-inducing "significance" finding. If not, the Draft EIR should state that, while public school construction could induce growth in the Future Urbanizing Area, the proposed Update will not result in significant growth-inducing impacts.

11.0 CUMULATIVE IMPACTS

11.1 The existing "cumulative impacts" discussion is inadequate. A legally adequate cumulative impacts analysis requires an assessment of the proposed project viewed over time and in conjunction with other related past, present or reasonably foreseeable probable future projects whose impacts might compound or interrelate with those of the project at hand. *See also,* Guidelines §15130. The cumulative impacts section should be rewritten. To be adequate, the revised analysis must include either: (i) a list of past, present and reasonably anticipated future projects, including those outside the control of the City, that have produced or are likely to produce, related or cumulative impacts; or (ii) a summary of projections contained in adopted general plans or other related documents that are designed to evaluate regional or area-wide conditions, provided, of course, that such documents are referenced and made available for public inspection at a specified location. The revised analysis should also examine reasonable options for mitigating or otherwise avoiding significant cumulative impacts. Revision is required.

12.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

12.1 This section is inadequate under CEQA and the Guidelines and should be revised in light of all the comments provided above.

13.0 ALTERNATIVES

13.1 The Draft EIR fails to include a true "no project" alternative, as required by CEQA, the Guidelines and applicable case law. An adequate "no project" alternative must be analyzed based upon the continuation of the status quo -- *e.g.,* the nature and extent of development under the adopted plan -- including an analysis under the adopted plan of existing development opportunities and public facility needs. Revision is required.

13.2 An EIR must describe a range of reasonable alternatives to the proposed project, or to its location, which could feasibly attain the project's basic objectives, and evaluate the comparative merits of the alternatives. Guidelines §15126(d). The discussion must focus on alternatives capable of either eliminating any significant adverse effects or reducing them to a level of insignificance, even if such alternatives would be more costly or, to some degree, would impede the project's objectives. Guidelines §15126(d)(3). If there is a specific proposed project or a preferred alternative, the EIR must explain why other alternatives were rejected, if they were considered in developing the proposal. Guidelines §15126(d)(1). The existing "alternatives" section is inadequate because it does not satisfy any of these legal requirements.

61

61. The analysis of incremental traffic and air quality impacts included area-wide plans such as the planning for the North City Future Urbanizing Area. The documents used by the Engineering & Development Department in their analysis are on file in that department. Consistent with the general level of planning, the analysis of cumulative impacts included development which is foreseeable according to surrounding adopted community plans.

62

62. Revisions are not considered necessary.

63

63. The Alternatives section of the EIR has been revised to include a second No Project alternative which would maintain the *status quo* i.e. no additional development. Please refer to Section IX.1. of the FEIR.

64

64. All project alternatives acheive the project's objective which is to update the adopted community plan. The alternatives address reduction or avoidance of significant impacts including traffic and air quality, biological and landform alteration. Findings will address the feasiblity of the alternatives.

13.3 The existing alternatives section is inadequate under CEQA, the Guidelines and applicable case law because it fails to identify and analyze the plan alternatives presented in the proposed Update. There is also no attempt in the Draft EIR to compare the plan alternatives to the land use plan proposed in the Update. Revision and recirculation are required.

65

13.4 At page 53, the Draft EIR refers to a significant loss of coastal sage scrub habitat. The statement is incorrect. Newland California conducted an analysis of extending Camino Ruiz through Vista Alegre. Based on that analysis, there was a 2/10ths of an acre loss of coastal sage scrub habitat -- which was not considered significant. To our knowledge, City staff has never taken the position that the impact upon coastal sage was "significant." Please respond.

66

13.5 At page 53, the Draft EIR again refers to an "important" wildlife corridor that has never been established by any competent biology surveys. From a common sense standpoint, it is hard to imagine that this so-called corridor is "significant," since it is blocked from Peñasquitos Canyon by Park Village Road. Please respond.

67

13.6 At page 53, last paragraph, the Draft EIR again discusses the alternative of eliminating Camino Ruiz because of the existence of an "important" wildlife corridor, which to our knowledge has never been established to exist by any competent biological surveys. Please respond.

68

13.7 At page 54, second paragraph, the Draft EIR states that a "traffic study" would be required in connection with a "development proposal" to construct a portion of Camino Ruiz. There is no basis for requiring a future development proposal to conduct the traffic study based upon alternatives presented in *this* document. In fact, the Draft EIR is itself inadequate because it has not conducted the traffic study called for by the alternatives identified. The City should perform the traffic study. After completing the study, the results should be discussed in a recirculated Draft EIR.

69

13.8 At page 54, third and fourth paragraphs, the Draft EIR refers to the elimination of Paseo Valdear. Reviewing a map of the community confirms that Paseo Valdear will serve Peñasquitos by providing a useful circulation link that is currently missing. Please respond.

70

13.9 At page 54, the Draft EIR concludes that elimination of the Paseo Valdear extension "would likely not affect traffic circulation in the community." This statement cannot reasonably be made without conducting a traffic study to determine the effects upon the community if the Paseo Valdear extension is eliminated. Unless and until that study is performed, the alternative of eliminating the Paseo Valdear extension is inadequate. Once the work is performed, the results of the traffic study should be discussed in a recirculated Draft EIR. If the study has been performed already, the recirculation Draft EIR should discuss the results of that study. Please respond.

71

65. The purpose of the alternatives section is to discuss those alternatives which would reduce or avoid significant impacts and acheive the project goals. The project objective is to update the adopted community plan. Thus, it was not required to address the plan alternative of continuing the pattern of existing land use plan (1978 community plan) in the EIR. Alternative B is the draft community plan which is the subject of the EIR. Alternative C would increase impacts because it permits greater development intensity; it does not not need to be addressed in the EIR because it is not environmentally superior to the proposed project. Alternative D is a reduced density alternative, a version of which was included in the EIR.

66. The EIR discloses a potential loss of coastal sage scrub habitat in connection with a particular alternative, without drawing a conclusion of whether the impact is significant. The discussion does not relate to a particular project in process.

67. The impacts on the wildlife corridor have probably been minimized becuae of the low traffic volumes on Park Village Road. There have probably been impacts on the smaller animals that will not cross pavement. The corridor is still being used by bobcat, mountain lion, deer, and coyote. From the tracks noted on both sides of Park Village Road, there is a significant amount of animal use.

68. Refer to response No.47.

69. Historically, City of San Diego decision makers have adopted alternatives with a condition subsequent that a study be conducted. Therefore, the alternative of deleting a stretch of road could be adopted on the condition that E&DD conduct a traffic analysis to identify detailed engineering measures that may be necessary. Preliminary indications show that no impacts would occur.

70. Refer to response No.57.

71. Refer to response No.69 which applies to the alternative of deleting Paseo Valdear extension.

13.10 At page 54, last paragraph, the Draft EIR again refers to the "no industrial element" alternative. This is not a reasonable or feasible alternative because it is not an alternative which avoids or otherwise minimizes environmental impacts. Instead, the alternative simply transfers potential impacts, if any, to the neighboring Sabre Springs Community. Please respond.

13.11 At page 55, the Draft EIR also contains numerous conclusions about different development scenarios, less grading, narrower streets, *etc.* These assertions appear to be entirely theoretical. No land use plans are presented. No statistical analysis is included. No comparison is made between the alternative and the proposed project. In short, the analysis is inadequate, incomplete and inaccurate.

13.12 At page 55, the Draft EIR discusses a "very low density" alternative for the Black Mountain Neighborhood. This alternative is *not* addressed in the proposed Update. What studies have been performed by City staff to assess the reasonableness and feasibility of this "alternative"? Please respond.

13.13 The "very low density" would probably be more severe than the recommended alternative in the Update. The one dwelling unit per acre proposal would also require more road construction, which means more extensive grading. What studies have been performed by City staff to assess these probable effects? Please respond.

13.14 At page 56, the Draft EIR devotes three sentences to a "compacted development/increased density" alternative. This analysis is inadequate, incomplete and inaccurate.

13.15 At pages 56 through 58, the Draft EIR discusses the open space "island" concept. Again, the Draft EIR should disclose the technical data relied upon in support of this concept.

13.16 Why doesn't the Draft EIR evaluate the "recommended alternative" set forth in the proposed Update? Revision and recirculation are required to add the Draft EIR's analysis of the proposed Update's "recommended alternative."

72. Eliminating the industrial element would avoid the impact of a conversion of open space to development and a potentially significant impact on visual quality if a future project is not sensitively designed and screened. Impacts would not be "transferred" because the site would be located within an existing industrial area.

73. The alternative applies to all areas in the Black Mountain neighborhood that are designated for residential development and as yet undeveloped, as stated in the EIR.

74. City staff is currently reviewing and considering adoption of these alternatives for the draft plan.

75. Qualified staff developed the alternatives consistent with policies and practices observed with all projects.

76. The description of the alternative is considered complete and accurate.

77. Refer to response No.52.

78. The recommended alternative in the draft plan is the subject (or "proposed project") of the draft community plan itself. This EIR addresses the proposed project.

PUBLIC IMPROVEMENTS TO THE RANCHO PEÑASQUITOS COMMUNITY PLAN (SINCE APPROXIMATELY 1986)

A. SUBDIVISION IMPROVEMENTS

Specific Improvement	Status	Amount
1. Widen Black Mtn Rd from SR-56 to southern community boundary.	Complete	$ 200,000
2. Construct Black Mtn Rd bridge southbound.	Complete	$ 1,500,000
3. Widen Black Mtn Rd to 4 lanes from Oviedo to northern community boundary.	Complete	$ 2,500,000
4. North City Parkway	Complete	$ 1,600,000
5. Construct Park Village Rd. from Camino Ruiz to Black Mtn Rd.	Complete	$ 4,500,000
6. Traffic Signal @ Black Mtn Rd and Carmel Mtn Rd.	Complete	$ 100,000
7. Traffic Signal @ Black Mtn Rd and Park Village Rd.	Complete	$ 100,000
8. Traffic Signal @ Carmel Mtn Rd and Peñasquitos Drive.	Complete	$ 100,000
9. Traffic Signal @ Carmel Mtn Rd and Twin Trails Drive	Complete	$ 100,000
10. Traffic Signal @ PQ Blvd and Via del Sud.	Complete	$ 100,000
11. Traffic Signal @ Carmel Mtn Rd and Sparren Avenue.	Complete	$ 100,000
12. Traffic Signal @ Carmel Mtn Rd and Entreken	Complete	$ 100,000
(Approximate) Subtotal:		$ 11,000,000

B. FBA AND STATE FUNDED IMPROVEMENTS

Specific Improvement	Status	Amount
1. Improve Peñasquitos Drive to modified 4 lane major street.	Complete	$ 600,000
2. Construct SR-56 from I-15 to Black Mtn Road. (Note: cost estimate includes state funds, estimated right of way value, and FBA contributions)	Under Construction	$ 20,000,000
3. Carmel Mtn Road @ Peñasquitos Drive widening.	Completed	$ 750,000
4. Pedestrian Bridge @ Park Village Drive.	In Design	$ 1,050,000
5. Traffic Signal @ Cuca St. and Carmel Mtn. Road	Complete	$ 100,000
6. Traffic Signal @ Paseo Valdear & Carmel Mtn. Road.	Complete	$ 100,000
7. Traffic Signal @ Paseo Cardiel & Carmel Mtn. Road.	Complete	$ 100,000
8. Canyonside Park Recreation Building	In Design	$ 2,200,000
9. Ridgewood Neighborhood Park	Complete	$ 1,100,000
10. Canyon View Elementary School	Complete	$ 5,200,000
11. Deer Canyon Elementary School	Complete	$ 8,100,000
12. Adobe Bluffs Elementary School	Under Construction	$ 7,700,000
13. Mesa Verde Middle School	In Design	$ 20,000,000
14. Peñasquitos Branch Library	Under Construction	$ 2,400,000
(Approximate) Subtotal:		$ 69,400,000

C. DEVELOPMENT AGREEMENT IMPROVEMENTS

Specific Improvement	Status	Amount
1. Teen Center/Peñasquitos Family YMCA.	In Design	$ 650,000
2. Donation of SR-56 Right of Way (Included above)	Complete	$ 0
3. Traffic Signal Reconstruction @ Oviedo and Black Mtn. Road.	Complete	$ 50,000
4. Traffic Signal @ Paseo Montalban and Salmon River Road.	Complete	$ 100,000
5. Traffic Signal @ Stoney Creek Road and Carmel Mtn Road.	Complete	$ 100,000
6. Traffic Signal @ Freeport Road and Carmel Mtn Road.	Complete	$ 100,000
7. Funds for SR-56 west of Black Mtn Road.	Available	$ 3,700,000
8. Black Mtn. Middle School Gymnasium	Complete	$ 900,000
9. Views West Park	Under Construction	$ 5,600,000
10. Peñasquitos Creek Park	Complete	$ 1,300,000
11. Hilltop Park Grading & Improvement of Oviedo Way	Complete	$ 1,500,000
12. Other Park & Recreation Financing.	Complete Available	$ 800,000 $ 1,400,000
13. Donation to Peñasquitos Branch Library	Complete	$ 2,000,000
14. Towne Centre Park	In Design	$ 400,000
(Approximate) Subtotal:		$ 18,600,000
(Approximate) Total All Public Improvements:		$ 99,000,000

Rancho De Los Peñasquitos

PLANNING BOARD

P.O. BOX 29010
SAN DIEGO, CA. 92129

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MAY 8 1992
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May 8,1992

Lawrence C. Monserrate
City of San Diego
Planning Department.
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, California 92101

Re: EIR Comments on the Rancho Penasquitos Community Plan Update

Subject and Summary Section:

Pg 1.- It has always been our feeling that the City doesn't know where Rancho Penasquitos is and this proves it. Rancho Penasquitos is West of I-15 not East as stated in the second to last sentence in the opening paragraph. Also, the community is bounded on the West and North by the FUA. Rancho Bernardo is North/East of Rancho Penasquitos.

79

79. Refer to response No.1.

Pg 1.- The summary and conclusions section of the EIR states that " the purpose of the update is to mainly address the public facility needs of the community which did not keep pace with the rapid development of the community in the 1980's." It would seem that if this is indeed important the EIR would in some fashion address this issue. It does not. In fact the community through prudent use of the FBA and development agreements has made incredible progress and improvement over the past six years. This should be acknowledged, discussed, and future facility needs identified in the EIR.

80

80. Through the initial study it was determined that the status of public facilities in the community is not an issue that would involve significant environmental impacts. Therefore, the issue was not addressed in the EIR.

Pg 2.- There appear to be assumptions not necessarily based on fact in this section. The first is the potential isolation of Hilltop Park. This area is already graded and the street improvements in. Did anyone look physically at this area? We have never seen or heard a gnatcatcher in this area. We would like to see the studies and documentation for this statement.

81

81. Qualified staff observed gnatcatchers on the slopes below the graded portion of Hilltop park. There is a connection to undisturbed habitat to the south and east of the cul-de-sac of Oviedo. There was an on-site survey of the area.

Pg 2.- The wildlife corridor mentioned is not consistent with the open space corridors being planned in the FUA. In fact the framework plan shows this corridor at a dead end at Carmel Mountain Road. It is also already disturbed due to the fact that Park Village already splits it at the canyon.

82

82. The subject of this EIR is the Rancho Penasquitos community. The corridor referred to in this EIR is existing regardless of whether it is consistent with those corridors which are planned to be left in the Future Urbanizing Area. Refer to response No.67.

Pg 2- The comments pertaining to the alignment of Camino Ruiz and its visibility from the Preserve are not wholly accurate. Again, a physical inspection of the area would show that it is already a residential area with considerable grading and development having occurred. Also, in several places, the Draft EIR refers to City staff's proposal to eliminate Camino Ruiz. There are approximately 1,500 existing residential lots whose only access in and out of the community is through Park Village Road. Camino Ruiz joining Carmel Mountain Road, as shown on the adopted plan, will provide the community with an alternative access route. If Camino Ruiz is taken out there will be no alternative access route and the only way this neighborhood can reach SR56 is via an overburdened Black Mountain Road. The result will be a long cul-de-sac street with approximately 1,500 existing homes. We do not believe that this result would be viewed with favor by either the City's fire or police department. In the event that Park Village Road were ever blocked, neither the police nor the fire department could adequately service the existing homes in an emergency. We would like to see the traffic study relied upon by City staff to support the elimination of the Camino Ruiz extension. If that traffic study exists, the Draft EIR should summarize its findings. In addition , we would like the Draft EIR to discuss these traffic safety issues.

83

83. The alternative of deleting a stretch of Camino Ruiz has been discussed with the Fire Department and the Engineering & Development Department. The Planning Department is satisfied that the alternative is feasible based on discussions with those departments; feasible solutions to potential emergency access problems appear to be available. At this level of planning, only preliminary determinations have been made and they are based on the expertise of experienced staff.

Pg 2- The grading requirements for the Montana Mirador project, as presented to the Planning Board called for fill slopes of 120 feet not 180, and cuts of 95 not 80. This discrepancy needs to be explained as this is not what was presented to us. Please check the plans.

84

84. Refer to response No.4.

Pg 2- There seems to be some confusion as to where Black Mtn. is or is not in the Community. Our understanding is that Black Mountain is the next hill to the north and not part of the development. The neighborhood may be called Black Mountain but that doesn't make it part of the mountain physically.

85

85. The draft land use plan designates residential use physically on the slopes of a topographic feature which is labeled as Black Mountain.

Pg 3- Camino Ruiz- This is curious. When we were discussing removing Camino Ruiz from the plan the City traffic engineers were telling us that Rancho Penasquitos needed this road. We were told that our community desperately needed to keep this part of the circulation element and that the impacts to Rancho Penasquitos were

86

86. According to E&DD traffic studies, the levels of service for intersections in Rancho Penasquitos will remain at C or better whether Camino Ruiz is extended across the canyon or not. Refer to response No.109.

detrimental. Now you are saying it's Mira Mesa that will suffer. Which way is it?

Pg 3- Land Use- We understand that these projects are not subject to RPO. Is this something that should be mentioned just to be honest or do we pretend that restrictions exist that don't?

Pg 4- Growth-Inducing Impact- We understand that addressing this issue is required under CEQA but is it fair to state that the only reason two public schools are proposed in the FUA is because there is high demand, great need, and no other place to put these schools. If the EIR is looking at all at facilities let's discuss what happens to the education of these 2300 children if we don't build the schools.

Pg 4- Public Facilities- You state that Camino Ruiz across "may result..." Which way is it? When Camino Ruiz is built north to 56 you say it "would result..." yet when it's going across the Canyon it " may result." These should be switched to " may result" when Camino Ruiz is built north and " will result" when Camino Ruiz crosses the Canyon. This appears to be an attitude, philosophy or what have it but it is imperative that this be an honest reflection of impact not subjective based on personal preference. What is the environmental impact if Camino Ruiz crosses the canyon?

Pg 5- c.- Not an acceptable alternative per earlier comments.

Pg 5- d.- We have a desire to examine pulling the extension of Paseo Valdear out, from Penasquitos Dr. to the eastern edge of Montana Mirador. We would like to see a traffic study on this.

Pg 5- Hydrology- There is an existing problem with siltation and runoff from the graded lots in Park Village.

Pg 6- Land Use- The proposed RV storage site is nothing more than a vacant lot. We will address the other issues later in our comments.

Pg. 6- Traffic- We want to point out that all traffic studies include 56 to I-5. Engineering cannot run the

87

87. Refer to response No.34.

88

88. The EIR discloses that growth would be induced in the City's designated urban reserve by locating the schools there. The EIR is not stating the educational facilities are not needed to serve Rancho Penasquitos.

89

89. The FEIR is revised to reflect that retention of the extension of Camino Ruiz across the canyon would result in significant impacts on biological resources and visual quality.

90

90. Refer to response No.86.

91

91. Refer to response No.57.

92

92. Comment noted.

93

93. The site is designated as Open Space in the adopted community plan and lack of development would be consistent with this designation.

94

94. Refer to responses No.30 and No.86. The traffic studies completed by E&DD for the draft plan are considered adequate. Requests for additional studies cannot be addressed by this EIR.

North City traffic forecast without SR56 as a completed freeway. Since this may not happen in our lifetime, as there is no funding and potential funding is conditional on voter approval of development in the FUA,and 56 is the critical piece in the entire transportation network and without it Penasquitos traffic fails we would like language to that effect in the EIR.
We would like to see a study on Black Mountain Road to change it to a four lane major with enhanced intersection geometrics at Twin Trails, SR-56 and Carmel Mountain. Specifically, this will include six lanes from southern boundary to Park Village, five lanes to SR56 and four lanes for the remainder north with a K-rail in the median.

95

Pg 6- Land Use- Stating that the RV/Mini-Storage site would be "highly visible" is subjective and does not take into account any mitigation factors.

Pg 7- Carmel Mountain Road- Not possible. This would entail The condemnation of existing businesses and apartment houses. The classification of Carmel Mountain Road should be changed to prime from major.

96

EIR

Pg 2- II. Project Location- Penasquitos is 6500 acres not 65000. The location description is also more accurate than in the introduction.

97

Pg 4- Biological Resources- We request a study on the vernal pools. The appropriate season to conduct such study is almost over. The vernal pool habitat suggested in the EIR is not confirmed and we have seen no documentation that backs up these statements. Please provide the documentation.

98

Pg 6- Paragraph 2- This states that 90% of the land is designated for residential use yet in another section of the EIR it states that we have 23% open space. Which is it? This also states a variety of density numbers we have not seen. Montana Mirador is 575 units and the project north of Montana Mirador is 227 units. Let's use the accurate numbers. The draft EIR identifies the number of residential units "allowed" under both the adopted Community Plan and the proposed Update. These numbers are incorrect. The proposed Update (pg 28) identifies the

99

95. The EIR statement that the site itself is highly visible is considered factual. Refer to response No.32.

96. Refer to response No.153.

97. Refer to response No. 13.

98. A biology study was not prepared for the update of the community plan. However, during the preparation of the DEIR, qualified staff familiar with the area conducted field reconnaissance surveys of the remaining areas designated for development in the community. In addition, staff relied on recent information provided by professional biologists.

99. The EIR has been revised to show that 52 percent of the community land area is designated for residential development; about 90 percent of the area which is designated for development has been granted project approval. (Refer to response No.117.) Further, the EIR has been revised as follows with regard to the density for a 635- acre property on the southern and eastern slopes of Black Mountain.

> The adopted plan and mid-range density ordinance would allow approximately 275 units. The proposed plan would allow approximately 575 units.

In addition,the EIR has been revised as follows with regard to the density for a 232-acre property located on Black Mountain.

> The proposed plan would allow a maximum of approximately 300 units. The adopted plan would allow approximately 200 units.

The EIR addresses the land uses proposed by the draft plan, but does not address the specifics of projects in process.

desired range of residential density based on topography, geology, views, land use configurations, access and other considerations. The proposed Update further states: "Within the portion of Montana Mirador available for development, no more than 575 units will be constructed." The proposed Update then goes on to describe a desired mix of housing opportunities. Why doesn't the Draft EIR address this proposed development?

Pg 9- Project Description- The Plan is a little late. In fact over the past 6 years numerous projects have been built, planned and funded in our community to solve these problems. We have built two new elementary schools, with a third currently under construction due to open this fall. The Mesa Verde Middle School is currently funded and set to start construction late this year. The library is under construction. We have two new parks, a third to be constructed this summer, a community gym at Black Mountain. Middle School is completed, a teen center in design but fully funded, numerous street improvements including 56 in our community, for capital improvements of close to or over $100,000,000 in six years in Penasquitos. There are more planned and we would refer you to the FBA and proposed development agreements for confirmation. The Plan is way too late!
The EIR does not address any facility needs so we must assume that we either are in a hopeless situation or have no needs. The proposed Update also proposes the goal of maintaining a high level of public facilities and services concurrent with community growth and in conformance with the City's General Plan. Why doesn't the EIR identify, discuss and analyze the public facility and service needs of the community?

Pg 6- Surrounding Land Uses- Sabre Springs is only one-fifth built out.

Pg 9- Project Description- " The Rancho Penasquitos Community Plan was drafted to resolve deficiencies in the previous plan." This appears to give a purpose to the report that is not consistent with the reports objectives. We feel we are curing the facility inadequacies, and the deficiencies from the previous plan. If this is true please state this in the report.

100

100. Refer to response No.23 and response No.80.

101

101. The EIR has been revised to delete the reference to Sabre Springs as almost completely built out.

102

102. The purpose of the community plan update is to resolve the deficiencies of the adopted plan. The purpose of the EIR is to address the community plan update. Through the Initial Study conducted before preparation of the DEIR, it was determined that there would be no significant environmental impacts associated with public facilities in the community. Therefore, the issue is not addressed in the EIR.

Pg 11- 5.- The overlay zone needs to be applied to the existing commercial that is not covered under a PCD. Specifically the centers at the corner of Carmel Mountain Road and Penasquitos Boulevard, the center at Carmel Mountain and Paseo Montril, and the center at Carmel Mountain and Penasquitos Drive.

103. The draft commmunity plan does not include the suggested application of the overlay zone.

Pg 11- 6- We agreed to pull the public facilities and transportation phasing plans out of the Community Plan because the document is not fluid, and the FBA should be able to handle this.

104. The EIR has been revised to delete the phasing plan as an element of the updated plan.

Pg 12- Environmental Analysis- The text of the draft EIR repeatedly talks of the significant environmental impacts which will result if the proposed Update is adopted. The Draft EIR fails to recognize or state that the proposed Update was written to be far more environmentally sensitive than the adopted Plan. The Planning Department needs to place greater emphasis on this fact in its discussion of the environmental impacts of the proposed Update and under the No Project Alternative section found on page 51 of the Draft EIR.

105. This information can be provided to the decisionmakers during public hearings and does not address the adequacy of the EIR.

Pg 12- A.p2 Traffic- Until SR56 is completed I-15 provides the only access to downtown and the coast. This should be noted.
Access to I-15 should also include North City Parkway.

106. Access to downtown is addressed in paragraph 1 of this section. The EIR has been revised to show access to I-15 is also provided by North City Parkway.

Pg 13- Second paragraph- Please include Carmel Mountain Road as a basic roadway in the community.

107. The EIR has been revised to show that Carmel Mountain Road is a basic roadway in the community.

Please note that all the traffic studies are premised on SRS6 being a completed route to the coast, Carmel Valley Road and Carmel Mountain Road also being completed west. We would like the EIR to address what happens if these roads are not constructed.

108. The traffic analysis in the EIR is based on standard methodology required by the E&DD. Interim impacts are not typically analyzed by the E&DD since the roadways are assumed to be built.

Pg 13- Impact- It is our understanding that the traffic studies regionally are based on 1.67 units per acre in the FUA. At 2.5 units per acre with or without Camino Ruiz traffic breaks down. The travel forecast for our plan uses capacities 25% higher than those usually acceptable in developer studies submitted to the City. Car pool usage is extremely optimistic. The values obtained come very close to being at the next lower level of service. Removal of Camino Ruiz will aggravate traffic congestion on I-15.

109. Regional traffic studies that E&DD used as the basis for the Rancho Penasquitos analysis assumed 2.5 du/acre. Application of that assumption to scenarios both with Camino Ruiz extended across the canyon and without, indicates that levels of service at major intersections would remain at C or better, with the exception of the intersection of Rancho Penasqitos Boulevard and Paseo Montril which would operate at a level of service D. This level of service is attributed to maintaining Rancho Penasquitos Boulevard as a four-lane road between Carmel Mountain Road and Paseo Montril, rather than widening that stretch to six lanes; the reduced level of service is not related to, and is not affected by, whether Camino Ruiz is extended across the canyon.

Pg 16- Mitigation measures 3- There is not enough room or right of way to improve Rancho Penasquitos Boulevard through this stretch of the community.

Pg 16- 2- Please change per our previous comments regarding page 6 "traffic".

Pg 17- last paragraph- This directly conflicts with the presentations made to us when we were forced to approve the North City Traffic Forecast. We don't believe this to be true but are willing to suffer to preserve the Canyon. However, we truly believe the North City Traffic forecast is fatally flawed, based on false assumptions, and forced to work in order to satisfy City requirements. There are new studies that differ from this. The LOS at the 14 key intersections needs to be identified. we would like to list and show the LOS at AM-PM peak hours.

Pg 19- Mitigation- Of course there are impacts. We were told there would be some and fully expect them.

Pg 25- Significance of impact- We believe there will be significant impacts to air quality if, as proposed in this Draft EIR, Camino Ruiz is not constructed north of Park Village Road to SR-56. Was this impact examined in any staff study? Please respond.

Pg 25- Mitigation- We do not believe you are showing all of Mira Mesa's relevant goals. Please show them.

Pg 26- Land use- It is not acceptable to solve our internal problems by forcing them on Sabre Springs. The RV proposal occurred as a result of a planning department study made at our behest. This site is the least offensive to all but eight condominium owners. It is easily bermed, landscaped, and screened. Even though the site is empty it looks like a vacant industrial storage yard. It is an eyesore for the entire I-15 corridor. This is not open space. It is by every definition a vacant lot. There is an 80 foot elevation difference and the view is over the RV yard. The report states that " many residents park their RV's illegally on residential streets because regulations prohibit parking on streets." This sentence doesn't make sense. The mitigation measures should be studied. There is also the possibility that this area could become an important area for future ramp

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110. As stated in response No.109, E&DD is recommending that Rancho Penasquitos Boulevard not be improved to six lanes (see memo from the Engineering & Development Department). The reduction in level of service is considered acceptable because of the proximity to the freeway, the limited number of freeway access points, and the expense of improving or rebuilding freeway interchanges.

111. Refer to response No.94.

112. Refer to response No.109. The EIR has been revised to include the LOS table from E&DD.

113. Comment noted.

114. The alternative of eliminating the stretch of Camino Ruiz north of Park Village Road would not be feasible if Camino Ruiz is extended across the canyon and would then provide a fully functioning north-south corridor. Preliminary determinations from E&DD indicate that elimination of that stretch of Camino Ruiz (if Camino Ruiz is not connected to Mira Mesa) would not be detrimental to circulation in the community, and would not overload street segments or intersections.

115. For a full description of Mira Mesa's transportation goals, please refer to the FEIR for the update of the Mira Mesa community plan (DEP No. 89-1221, SCH No. 91051053).

116. The Sabre Springs community has land which is already zoned and prepared for industrial-type uses such as an RV storage area. Refer to response No.72.

interchange improvements. The Sabre Springs sites would be more visibly intrusive and less tolerable to the Communities.

Pg 31- Existing Conditions- The tenor of the first paragraph indicates that San Diego, not just Penasquitos, should not exist. If everything is a negative impact then nothing is good. This makes no sense. Paragraph 3 is wrong. The Canyon is approximately 3000 acres.
Again if we have 23% open space where does this 85% come from?.

117

Pg 31- Paragraph 4- line 2- "To" should be "do". The idea seems to be kill the extension of Camino Ruiz to SR56. The wildlife currently cross Park Village and when build out occurs considerable traffic will be forced to use Park Village that could be channeled to 56. It would seem that to kill Camino Ruiz is a long term method of insuring additional road kill.

118

Pg 33- Last sentence- We know of no sightings of gnatcatchers at this site. This is going to be a community park. Again, please send copies of technical studies supporting your statements to this Board.

119

Pg 35- Second paragraph- Mortality is not high because there is minimal development west of the existing portion of Camino Ruiz.

120

Pg 38- Second paragraph - The word massive is subjective. Please check the proposed grading plans, as submitted, and respond.

121

Pg 39- Mitigation- The removal of Camino Ruiz from Park Village to SR56 is not acceptable and would negatively impact the entire circulation element for the community.

122

Pg 40- We would consider removing Paseo Valdear east of its planned terminus in Montana Mirador to Penasquitos Drive This section serves no circulation purpose and would negatively impact Penasquitos Drive.

123

Pg 41- Impacts- Specific grading plans are available and we feel much improved over past proposals and projects.

124

Pg 42- Second paragraph- This area is already improved,

125

117. Developed parks and designated open space combined are approximately 34 percent of the community. For the residentially designated area, approximately 90 percent has been granted development approval and approximately 85 percent has been built. Approximately 52 percent of the total land area in the community is designated for residential development. The balance is roads, commercial, and public facilities.

The EIR has been revised to show the preserve acreage is approximately 3400 acres.

118. Comment noted. It is agreed that there is a potential for public safety and impacts and greater widlife mortality.

119. Refer to response No.81.

120. This comment is consistent with the EIR.

121. Refer to response No.48.

122. Comment noted.

123. Comment noted.

124. Comment noted.

125. Construction of this stretch of Camino Ruiz would be tied to approval of a residential development project which has not yet been approved. The EIR addresses future impacts which would occur if the draft plan is implemented. The EIR does not address impacts which have already occurred or the impacts of projects which have already been approved.

graded, with houses on a large portion and 800 more to be built. The road will not be the visual focal point. The development as a whole will have an impact but not just this vital part of the circulation element.

Pg 43- First paragraph- Here you encourage one unit per acre density. On pg. 31 paragraph 5 the report shows this area to be 900 acres. On page 42 second line the report states that 700 units are to be built. 802 are proposed. This is still less that one unit per acre.

126

126. The EIR has been revised to reflect approximately 800 units. The intent of the specified alternative is to reduce density to the extent possible because of the extremely sensitive nature of the resources in the area. The EIR has been revised to show the very low density alternative as retention of the area in the A-1-10 zone.

Pg- 43- Paragraph 2- The Sabre Springs land is more visible from the freeway than the site in Penasquitos. The grades are both above and close to the freeway, and below and removed from the freeway highly visible from the residential area in Sabre Springs. The best site for the RV storage is as proposed in our plan.

127

127. The Sabre Springs community has existing industrially zoned land where the required use could be accomodated without converting designated open space to industrial use. The visual impacts of this land use have been adressed in the EIR for the Sabre Springscommunity and do not need to be addressed in this EIR.

Pg 44- Impact- There is no reservoir in Rancho Penasquitos.

128

128. The EIR has been revised to delete the reference to sedimentation of reservoirs in describing the effects of urbanization on the hydrolgic environment.

Pg 48- Growth Inducing Impact- This is not accurate. Schools are not a significant growth inducer. Schools are a response to growth. Both schools proposed in the FUA are projected to fill with growth from Penasquitos alone. If anything as long as children live in Penasquitos this will inhibit growth because the capacity for growth in the schools will not be available.

129

129. The determination stated in the EIR is that the location of schools in the NCFUA would be growth inducing, but there is no statement regarding significance of the impact. The EIR states the growth would be induced because of the extension of infrastructure into the urban reserve. This would remove an impediment to development and is thus growth inducing.

Pg 50- Paragraph 3- The golf course was the first facility constructed in Penasquitos. The statement in the EIR is historically inaccurate.

130

130. The statement in the EIR provides a regional historical perspective on water conservation and is not intended for historical accuracy of Rancho Penasquitos.

Pg 50- Last Paragraph- Facilities and services are critical. There are no improvements without development. The demand as stated in the purpose of the document already exists. The facilities are in process and more will be built as part of every proposed project.

131

131. Comment noted.

Pg 52- We feel that the right of way for Camino Ruiz should be kept.

132

132. Comment noted.

Pg 52- Public Facilities- fourth paragraph- If traffic is backed up a half mile at Black Mountain and Park Village wouldn't that affect the air quality more than allowing the traffic to keep moving by providing Camino Ruiz?

133

133. It is agreed that air quality impacts would be alleviated by extension of Camino Ruiz across the canyon, as well as alleviating significant traffic impacts in Mira Mesa. This is consistent with the EIR analysis.

Pg 54- First paragraph- You are absolutely correct a traffic study will be required. In fact it should be part of this document.

Pg 54- No Industrial Element- The Board and other community groups in Rancho Penasquitos desire a recreational vehicle/mini-storage facility in their community. This desire is addressed in the EIR (pages 26-27), but the document concludes that a potentially significant visual impact may result if the proposed facility were approved as part of the proposed Update. First, we do not find any analysis in the EIR supporting this conclusion regarding visual impacts. Please provide this information. Second, we do not agree with City staff's conclusion that these visual impacts can only be mitigated by locating the proposed facility in another community. This alternative is completely unacceptable to this Board. Why can't landscaping and buffering/screening techniques be used as mitigation? Why doesn't the EIR address these types of mitigation measures? Please respond to our questions and concerns.

Pg 55- Black Mountain Neighborhood- This part of the EIR suggests project alternatives which are also unacceptable. First of all, the Rancho Penasquitos Planning Board has been an important part of the preparation of the proposed Update and the planning of this neighborhood. The proposed Update and the planning for this neighborhood are based on extensive research and review by the Board, the local property owners and city staff. After many years of effort, a consensus was achieved on planning and environmental issues impacting this neighborhood. The Draft EIR does not address this effort. Shouldn't the EIR address this project's background? Secondly, the proposed public improvements to be provided by future development in Rancho Penasquitos are dependent upon obtaining the densities allowed under the adopted plan and the proposed Update. We do not believe that any of the alternatives suggested in this section of the EIR will provide the units needed for proposed public improvements. Has the Planning Department conducted any studies which show that the development suggested in its alternatives are physically and economically feasible? Please provide this Board with such studies. Finally, these alternatives do not address the goals and objectives of the community in preparing the proposed Update.

134

134. Refer to response No.83.

135

135. The EIR states, in the Landform Alteration/Visual Quality section, that the visual impacts associated with the conversion of open space to industrial use "could be mitigated in one of two ways. First, by requiring a sensitive design with adequate screening...Second, by locating the use in nearby Sabre Springs..." Mitigation is not available at this level of review but would be analyzed when a project is submitted.

As of this time, staff is unaware of a proposal for a specific project which would be approved with the plan update. The plan is proposing to convert designated open space to an industrial use designation. Please refer to page 43 of the EIR.

136

136. The purpose of the EIR is to disclose information regarding environmental effects of the proposed project, the draft plan. Brief historical perspective provides the reader an understanding of the purpose for the proposed update. For further detail regarding the planning process, the reader is directed to the draft plan.

The alternatives provided are considered to meet the requirements of CEQA. In general, CEQA requires alternatives which are designed to avoid or reduce the significant impacts. The decisionmaker is required to make findings regarding adoption of those alternatives. The physical feasiblity of the alternatives was considered during formulation of the alternatives; economic feasiblity studies are not required by CEQA and were not conducted.

Refer to response No.64 and No.65.

Pg 59- II- EIR Preparation- What qualifications and degrees do these people have? We are trying to establish their qualifications and experience in the preparation of this document.

137

137. Qualified staff prepared the document.

We would like a summary, clear recommendations, in line with the stated purpose of the update.

We would like all backup data and copies of all studies that were used in compiling this report.

"J Street- City staff is aware that the adopted plan shows the proposed construction of J Street from the eastern portion of the Montana Mirador development to Carmel Mountain Road. This proposed improvement is desired by the Board and the community from a traffic circulation and safety standpoint. We are aware, however that City staff would like to see the "J" Street connection eliminated from the adopted plan. Why doesn't the Draft EIR address this issue? Isn't this issue being addressed in the impending environmental review for Montana Mirador? Isn't there information from that environmental review process which could be used by City staff in addressing the J Street issue? Shouldn't the Draft EIR highlight the environmental and planning issues associated with "J" Street?

138

138. "J" Street, proposed in the Montana Mirador project currently in process, is not a community plan road and therefore not within the scope of this EIR.

We, the entire Rancho Penasquitos Planning Board are disappointed in the quality of, and conclusions arrived at in this EIR.

We feel that an incredible amount of work and progress over the past six years is being ignored. We also know how much progress has been made in the facilities that we, the residents of Rancho Penasquitos, and Councilwoman Abbe Wolfsheimer have worked so hard for and are so proud of.

Rancho Penasquitos, when completed will have recovered completely from all shortages of facilities that once existed. Nowhere in the document is this acknowledged or discussed.

Rancho Penasquitos is the best example in this City of what co-operative growth management can accomplish.

Very Truly Yours,

Kevin J. McNamara

Kevin J. McNamara
Chairman
Rancho Penasquitos Planning Board

cc: Abbe Wolfsheimer
Rancho Penasquitos Community Council

CITY OF SAN DIEGO
MEMORANDUM

FILE NO: PE.1

DATE : April 30, 1992

TO : Tom Story, Deputy Director, Development and Environmental Planning Division, Planning Department

FROM : Allen Holden, Jr., Deputy Director, Transportation Planning Division, Engineering and Development Department

SUBJECT: Draft Environmental Impact Report for Rancho Penasquitos Community Plan Update

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The adopted Penasquitos East Community Plan shows Rancho Penasquitos Boulevard between Carmel Mountain Road and Paseo Montril as a six-lane major street, and between Paseo Montril and I-15 as a six-lane primary arterial. An extensive amount of road widening would be required for a six lane section. In conjunction with this roadway widening, it would be necessary to provide retaining walls and slope reconstruction along the south side of Rancho Penasquitos Boulevard. Median modification would also be required.

We have recently re-examined the need for the widening to six lanes. We calculated the Intersection Capacity Utilization (ICU) for three intersections, assuming Rancho Penasquitos Boulevard was a four lane major street:

	Level of Service (ICU)			
	6 lanes*		4 lanes*	
Intersection	AM	PM	AM	PM
Rancho Penasquitos Blvd. and Calle de las Rosas	C**	C**	C**	C**
Rancho Penasquitos Blvd. and Via del Sud	C**	C**	C**	C**
Rancho Penasquitos Blvd. and Paseo Montril	C**	C**	C**	D

* Rancho Penasquitos Boulevard
** Level of Service "C" or better

Only one intersection, Rancho Penasquitos Boulevard and Paseo Montril, would be impacted by changing the number of lanes from six to four. Its Level of Service (LOS) would be reduced from C to D. This intersection is immediately west of Interstate 15. Lower LOS is more readily accepted adjacent to freeways, due to the limited number of freeway access points, and the extremely high cost of improving or rebuilding freeway interchanges.

139

139. Requested revisions made for FEIR.

Caltrans is now improving Rancho Penasquitos Boulevard between Carmel Mountain Road and Azuaga Street to five lanes as a part of its SR-56/Rancho Penasquitos Boulevard interchange construction project. The remaining southerly portion of Rancho Penasquitos Boulevard now exists as a four lane major street.

We now recommend that the classification of Rancho Penasquitos Boulevard be changed to five lanes, between Carmel Mountain Road and Azuaga Street and to four lanes between Azuaga Street and I-15. We have attached modified street classification maps dated 4/28/92, and our comments on the Draft Environmental Impact Report for the Rancho Penasquitos Community Plan Update reflect this new recommendation.

Our comments on the EIR:

Page 6, paragraph 8, should be revise to read:

3. Rancho Penasquitos Boulevard. Adopted classification is six-lane major between Carmel Mountain Road and Paseo Montril, and is six-lane primary arterial between Paseo Montril and I-15. Change classification between Carmel Mountain Road and Azuaga Street to five-lane major street (3EB, 2WB), and between Azuaga Street and Interstate 15 to four lane major street.

Page 7 first paragraph, should be revised to read:

6. Carmel Mountain Road - Change classification between Paseo Montalban and Rancho Penasquitos Boulevard from 6 lane major (adopted) to 5 lane major (3EB, 2WB).

Page 13, last paragraph should be revised to read:

Results of the traffic studies conducted by Engineering and Development Department show that, with one exception, levels of service at all intersections would be "C" or better at buildout if the recommended street improvements are made. The intersection of Rancho Penasquitos Boulevard and Paseo Montril would operate at level of service "C" in the AM peak and "D" in the PM peak. The following recommendations regarding specific roadway improvements have been developed based on the Engineering and Development Department's calculations.

Figure 7, page 15 - Change Carmel Mountain Road six lane major street designation north of Rancho Penasquitos Boulevard to five lane major. Change Rancho Penasquitos Boulevard to five lane major between Carmel Mountain Road and Azuaga Street, and change to four lane major between Azuaga Street and I-15.

Page 16, Mitigation Measure 3 - Change to:

3. Rancho Penasquitos Boulevard. Improve to five-lane major between Carmel Mountain Road and Azuaga Street.

Page 16, last Mitigation Measure - Change to:

6. Carmel Mountain Road. The adopted plan shows Carmel Mountain Road between Paseo Montalban and Rancho Penasquitos Boulevard

as ultimately a 6 lane major street. Change its designation to 5 lane major (3EB, 2WB) and implement the fifth lane.

Page 17, last paragraph - Change to:

If the proposed land use plan is implemented, it is anticipated that the intersection of Rancho Penasquitos Boulevard and Paseo Montril will operate at LOS "D" in the PM peak, for both the Camino Ruiz "in" and "out" street network alternatives. All other intersections would have LOS "C" or better, for both street network alternatives. Therefore, there would be no impact on traffic circulation in Rancho Penasquitos if Camino Ruiz were extended across the canyon or not.

Page 18, first paragraph - Change to:

However, the results of the study showed a significant impact on levels of service at four major intersections in Mira Mesa if Camino Ruiz were not connected across the canyon. The study indicates that the four intersections would function at LOS "F" if the proposed Mira Mesa Community Plan Land Use Element is adopted and no street improvements are made to the four intersections. If the street improvements in the proposed Mira Mesa Community Plan Transportation Element are constructed and the Camino Ruiz crossing of Los Penasquitos Canyon is constructed, two of the four intersections will operate at LOS "C,": and the other two will operate at LOS "D." If the Camino Ruiz crossing is not constructed, and the street improvements mentioned before are made, and if one additional northbound traffic lane is added to Black Mountain Road south of Mercy Road, two of the four intersections will operate at LOS "D" and the other two will operate at LOS "E."

Page 18, Significance of Impact section, first paragraph - Change to:

The proposal to not extend Camino Ruiz across Los Penasquitos Canyon would have no effect on traffic circulation in Rancho Penasquitos. However, there would be significant adverse direct and incremental impacts on Mira Mesa. The result would be increased traffic volumes on already overloaded roads such as Black Mountain Road, Mira Mesa Boulevard, and Mercy Road. There would be significant cumulative impacts to four major intersections in Mira Mesa.

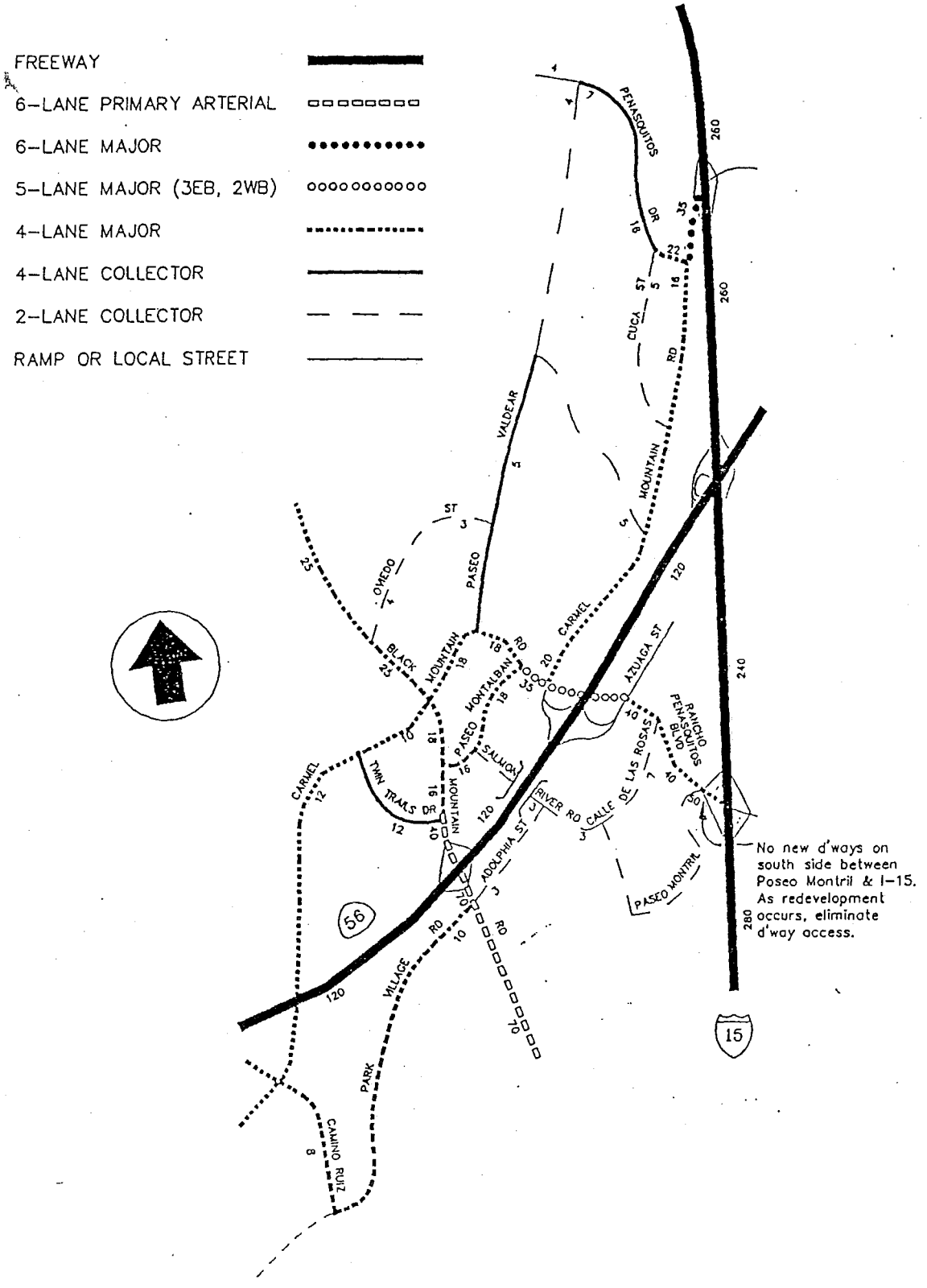
Allen Holden, Jr.
Deputy Director

CMS:hk
b:peleir.cms

cc: Walt Huffman
Dave Zull
Jonathan Levy
Jeff Washington
Mary Lee Balko
Janet Myers

4/28/92
File: PE8

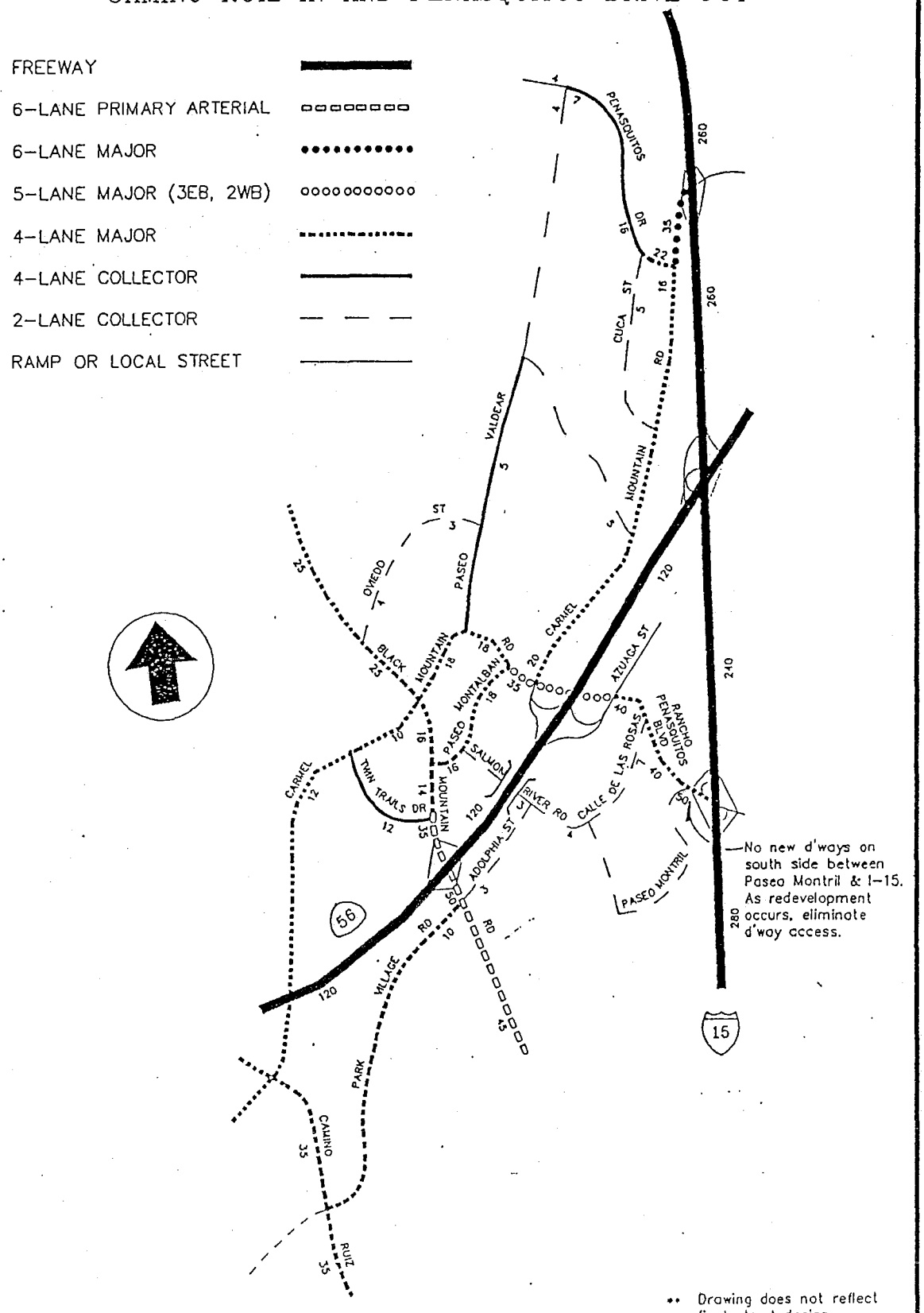
PENASQUITOS EAST
HORIZON YEAR AVERAGE DAILY TRAFFIC
(IN THOUSANDS)
AND RECOMMENDED STREET CLASSIFICATION **
– CAMINO RUIZ OUT AND PENASQUITOS DRIVE OUT –



** Drawing does not reflect final street design

4/28/92
File: PE5

PENASQUITOS EAST
HORIZON YEAR AVERAGE DAILY TRAFFIC
(IN THOUSANDS)
AND RECOMMENDED STREET CLASSIFICATIONS**
CAMINO RUIZ IN AND PENASQUITOS DRIVE OUT



** Drawing does not reflect final street design

Pardee Construction Company

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Weyerhaeuser

May 1, 1992

Mr. Lawrence C. Monserrate, Principal Planner
CITY OF SAN DIEGO
Planning Department
DEVELOPMENT AND ENVIRONMENTAL PLANNING DIVISION
202 "C" Street, Mail Station 4C
San Diego, CA 92101

Subject: Comments to the Rancho Penasquitos Community Plan Update "Draft" Environmental Impact Report

Dear Mr. Monserrate,

Thank you for this opportunity to comment on the "draft" EIR for the Rancho Penasquitos Community Plan Update.

As you are aware, in 1989 Councilmember Wolfsheimer initiated a report, to be prepared by the City Planning Department, locating and analyzing all sites within the Rancho Penasquitos Community that may be suitable for Recreational Vehicle/Mini Storage. The lack of R.V. storage facilities had been a critical issue in Rancho Penasquitos for over a decade because the community's codes, covenants, and restrictions prohibit R.V.'s from parking within residential neighborhoods.

The report identified and rated 16 sites which could be considered for use as a R.V. storage location. The City contacted the property owner of the No. 1 choice site and learned the owner was not interested in developing his property as a RV/Mini-storage facility. The City and Community Planning Group then contacted us, Pardee Construction Company, owner of the second best location, to ask if we were interested in building a RV/Mini-storage facility on our site (identified as Site 2 in the 1989 City Planning report). As a result of that request, Pardee then conducted economic feasibility studies along with site and architectural design studies. Although Pardee is not a R.V./mini-storage developer, we have considered the community's desires and agreed to locating the needed storage facility on our site. It is very important to state that this proposal was not initiated by Pardee but rather the City Planning Department and the Penasquitos Community Planning Group.

Since then several meetings/hearings have taken place within the Community regarding the proposed RV/Mini-storage facility to be located at Site 2. In April 1990, a site plan along with architectural plans illustrating the proposed RV parking and storage facility were presented to and unanimously approved by the Penasquitos Community Planning Group. In January 1991 the open

space easement exchange was brought before the Penasquitos Community Planning Group and received a unanimous approval also. The open space easement exchange proposed to vacate the open space easement on the graded, vacant, dirt lot, Site 2, in exchange for a 6+ acre naturally vegetated hillside located within the Sun Ridge Vista development boundary.

Site 2 was selected by the City Planning Department for a RV/mini storage industrial use based upon the following factors:

LOCATION AND ACCESS: A site would meet this criteria if it were located near freeways.

Site 2 meets this factor as it is located at the Southwest corner of SR-56 and I-15 along the perimeter of the Rancho Penasquitos Community planning boundary.

ADEQUATE SIZE: A site would meet this criteria if it possessed four or more acres.

Site 2 is approximately 10.2 acres in size and considered ideal for R.V. and mini-storage projects by mini-storage developers.

LAND USE CONFLICTS: A site would meet this criteria if it did not create visual or noise impacts on surrounding neighborhoods, and if there were no future plans or imminent developments occurring on that particular site.

Site 2 is bordered to the north and east by freeways, SR-56 and I-15 respectively; to the south by open space; and to the west by our multi-family development Terra Vista which is a part of the Sun Ridge Vista PRD. The grade differentials between the freeways and the proposed storage site coupled with the proposed landscape berm and sensitive building design reduces any visual impacts from the north and east to non-significant. In addition, the Terra Vista development to the west is minimally impacted visually by the proposed storage facility. Out of 304 dwelling units within Terra Vista, only 8 have a view which looks out over the storage facility. These 8 units are located on a pad approximately 78 feet above the proposed storage site. It is also important to mention that before every prospective purchaser signed any offer to purchase a condominium at Terra Vista they signed an agreement stating the following:

"As prospective purchaser(s) of the above condominium, you

advised us prior to our signing any offer to purchase, and we hereby agree as follows:

That a recreational vehicle and mini-storage area to be operated as a commercial facility open to the public is located on Lot 12 adjacent to the project in which the above condominium is located.

That an easement will be reserved across the above lot for ingress and egress to said Lot 12 which will be utilized by the public to access said Lot 12.

In selling this property to us, we acknowledge that you are relying on our above agreements, all of which shall become part of our Offer to Purchase and shall survive close of escrow."

LANDFORM ALTERATION: A site would meet this criteria if it has been previously graded, or requires very little landform alteration. A site would not meet this criteria if it is located in an area of natural slopes or hillsides.

This site was used by Caltrans as a construction yard and staging area during the construction of SR-56 freeway and off-ramp resulting in the site as it exists today. This site does not consist of any natural slopes or hillsides.

RETENTION OF OPEN SPACE: Site 2, although designated as open space, is not the type of open space which usually warrants preservation. The site has been previously graded and used by Caltrans as a construction yard and staging area during the construction of SR-56. As such, there are no biological resources on the site. The storage facility proposal includes exchanging open space easements with another location within the Sun Ridge Vista PRD. The area proposed to be granted to the City in exchange for Lot 12 is a highly visible slope which, for the most part, is in its natural state and considered by the Open Space Division of the Park and Recreation Department to be a much more valuable parcel to be preserved.

Given this information and background, direct comments to the "draft" EIR can now be made. Comments will be made by referencing the page number and paragraph from the "draft" EIR.

1.) Page 6, Paragraph 2, LAND USE: "...there would be a potential for a significant impact on visual quality because the

proposed site is highly visible from some major roadways."

It is not anticipated that the proposed site would be visually offensive due to the area being below road level and at such an angle, that motorists traveling east on SR-56 or south on I-15 would have to literally turn in their seats, look over their shoulders to see the site. In addition, the site plan for the storage facility includes a heavily landscaped berm along the eastern boundary to further screen the proposed site from any motorists traveling along I-15.

The architecture proposed for the storage site also mitigates visual impacts as it has been designed to look like the Terra Vista development, i.e. same exterior materials and colors. The City's Landscape Technical Manual further mitigates visual impacts with its guidelines for extensive landscaping within the RV parking area. The site will be much more vegetated at completion than it is now as a vacant dirt lot.

2.) Page 6, Paragraph 3: "visual quality could be mitigated...by development of the needed facility in the industrially-zoned area of nearby Sabre Springs."

This alternative defeats the desires and goals of the community to have a RV/mini-storage site <u>within</u> their community on the west side of I-15. The communities of Sabre Springs and Carmel Mountain Ranch, both located on the east side of I-15, at ultimate buildout will consist of approximately 10,290 dwelling units. This is a difference of only 5,210 dwelling units from the total dwelling units projected for the community of Rancho Penasquitos. The recommendation to re-locate a needed community facility to another comparably-sized community, based on unfounded potential visual impacts, is not sound planning.

The Sabre Springs site is also economically infeasible. The reason there are not any RV storage yards in the surrounding communities is because they have been inherently economically infeasible. This is because RV owners are unwilling to pay enough monthly rent to amortize the rental parking lot improvements, let alone the cost of amortizing the cost of an expensive piece of industrial land.

The reason Pardee was able to comply with the wishes of the City and Community was because the land in Sun Ridge Vista has no market value as open space and therefore has been carried on Pardee's books as a zero cost.

140

140. The EIR addresses the information provided in the draft community plan, rather than details specific to projects in process. The site is visible from the northbound I-15 traffic lanes and from other roads in the area. The EIR states the impact on visual quality could be mitigated by a sensitively designed project which is well screened. Compliance with requirements of the Landscape Technical Manual are not considered mitigation. The comment is consistent with the EIR.

141

141. The purpose of converting open space to an industrial designation is considered to be provision of RV storage in proximity to residents of Rancho Penasquitos. Since residents go outside the community for many of their services, and Sabre Springs is proximate to Rancho Penasquitos, this alternative is considered to be feasible.

The RV/mini-storage site could not economically be built in the Sabre Springs industrial park.

3.) Page 27, Paragraph 1: "However, there is industrially-zoned land in the adjacent community of Sabre Springs, where a mini-warehouse/RV storage yard would be permitted."

See comments from Item 2 above.

4.) Page 27, Paragraph 3, Sentence 2: "This analysis is conducted to evaluate whether development proposals consistent with the proposed community plan would be consistent with the Resource Protection Ordinance".

The reason for commenting on this sentence is to help the analyst remain focused on the goals and objectives of RPO. The analysis of issues which followed this statement in the "draft EIR" appears to have lost focus of the intent of RPO.

The following quote used to highlight RPO's objectives is taken directly from the Penasquitos Community Plan Open Space and Resource Management Element (page 113). "The Resource Protection Ordinance (RPO) serves to protect and preserve the environmentally sensitive lands of San Diego, including wetlands, wetland buffers, floodplains, hillsides, biologically sensitive lands, and significant prehistoric and historic resources,, as defined in the ordinance."

142

Site 2 which is a vacant, dirt, flat area with no vegetation does not fall under the classification of "environmentally sensitive lands". To treat it as such is not accurate reporting.

5.) Page 27, Paragraph 6 (last paragraph): "In addition, there would be an impact, though not considered significant, on biological resources because any undeveloped area, regardless of size, provides habitat for some species of wildlife."

143

The same argument might be made for a developed site if that developed site will provide more vegetation for wildlife habitat than the site had prior to development. This is the case for this site. There will be many trees, shrubs, and ground cover for wildlife foraging and nesting after development of the site whereas now there is nothing but dirt.

6.) Page 29, Paragraph 1: "The potential land use change could have a significant visual impact because the site is visible

142. The EIR states there would not be a direct (individual) significant impact on biological resources. This comment is consistent with the EIR.

143. Comment noted.

from Interstate 15 (northbound and southbound), from Carmel Mountain Road, and from SR 56."

See comments from Item 1 above.

Also, in a letter dated November 1, 1990 from the Open Space Division of the Parks and Recreation Department, the department states "The area to be given up is below road level, so it is anticipated it would not be visually offensive..." . This was the department's response to a request for conceptual approval of the proposed open space easement exchange and the construction of a RV/storage area.

144

144. Refer to response No.140.

7.) Page 29, Paragraph 3: "Mitigation of the potentially significant impact on visual quality could involve location of a RV parking/storage facility in the Sabre Springs industrial area. ...Adoption of this alternative would avoid potential impacts on visual quality due to conversion of open space to industrial use."

See comments from Item 1 above.

There are inconsistencies is this mitigation approach. To suggest moving a needed facility to another community as a sole means of mitigating any potential "visual impacts" is not comprehensive evaluation. The analyst earlier on page 6, paragraph 3 gave another alternative which is not mentioned in this section which is this impact on visual quality could be mitigated also by a sensitively designed project which is well screened. This alternative mitigation should also be identified on page 29, paragraph 3.

145

145. Page 6, paragraph 3, referred to in the comment, is in the conclusions of the EIR, whereas page 29 is in the Draft EIR. The conclusions summarize the contents of the EIR. The document is considered consistent.

8.) Page 51, Significant Irreversible Environmental Changes, Paragraph 2, last sentence: "In addition, implementation of an alternative to locate a recreational vehicle storage area in an adjacent community's existing industrial area would reduce the permanent change of open space to storage lot.

We would disagree that changing the use on a graded, flat, vacant, dirt lot from an open space designation to an industrial use would be considered a "significant environmental change". There are no biological resources on the site, no hillsides, no wetlands, and no endangered species to preserve as a valuable environmental resource to the Community. Also, it is not considered responsible planning to propose as an alternative the relocation of the RV storage area to an adjacent community without complete analysis of any

146

146. The draft community plan does not contain any language which explains how the loss of designated open space would be compensated. Without such language, implementation of the draft plan would result in the uncompensated loss of about 10 acres of open space. This is considered to be a significant irreversible environmental impact.

and all impacts that would create to the adjacent community.

9.) Page 54, Item 3 No Industrial Element:

The "no project" alternative does not consider the impacts to the Penasquitos community if the RV/mini-storage facility is relocated to another community. This proposal was brought forward by the City and Community to resolve a decade old problem Penasquitos has been experiencing concerning RV parking on residential streets and lack of storage provided in their own community. This analysis has ignored the very reason the Planning Group asked for this site in the first place.

147

We hope these comments will be helpful in your analysis of "public input" regarding the adequacy of the Draft EIR. Should you have any questions concerning the comments made above, please contact me. Again, thank you for this opportunity to comment on the DEIR.

Very truly yours,

PARDEE CONSTRUCTION COMPANY

David R. Poole
Project Manager

jwp/JP
enclosure

147. While the No Project alternative may not be considered to meet the project goals, CEQA requires an EIR to include an analysis of No Project.

Charles E. Woolever
9119 Bittercreek Lane
San Diego, CA 92129

May 1, 1992

Lawrence C. Monserrate, Principal Planner
Environmental Analysis Section/Public Projects
Development and Environmental Planning Division
City Planning Department
202 C Street
San Diego, CA 92101

The following comments are submitted regarding the adequacy of the Draft EIR for the Rancho Penasquitos Community Plan Update (DEP NO. 89-1222).

Analysis of the environmental impact of the proposed Penasquitos Community Plan appears inadequate in several regards. The report states that the removal of Camino Ruiz from the plan "would not have a significant impact on traffic circulation in Rancho Penasquitos". Removal of the Camino Ruiz crossing of Penasquitos Canyon could have adverse impact on traffic circulation in the Penasquitos community as well as in Mira Mesa. Development of the community to this point has been approved with this crossing included as a part of both the Progress Guide and General Plan and the community plans. Its removal now will result in greater congestion on local, collector and primary streets in Penasquitos than would result with completion of the road as originally planned. Peak hour congestion at freeway access points could be lessened by its inclusion which would result in reduced impact on air quality as well. Connection of Camino Ruiz to SR 56 would provide alternative routes for both northbound traffic from Mira Mesa as well as southbound traffic to Mira Mesa/Sorrento Valley reducing congestion in the I-15 Corridor. The I-15 Corridor between Poway Road and Pomerado Road is projected to become one of the most congested stretches of freeway in San Diego County in the next few years.

Proposed mitigation measures should include placing a high priority on construction of SR 56 from I-15 through to I-5, not just to the westerly boundary of the community. No mention is made of the need or desirability of completion of other roads westerly to the coast or northerly to Rancho Bernardo. These are integral parts of a regional circulation requirement between communities. Within the community, greater justification should be required for improving roads to higher capacity. The Mitigation measures recommending these improvements do not identify the negative impacts they might bring such as increased traffic, noise and reduced air quality. Additional alternatives should be identified.

148

148. The EIR states that elimination of the Camino Ruiz crossing would have regional circulation impacts. However, according to the traffic studies conducted by E&DD, construction of the crossing would not impact interior circulation in Rancho Penasquitos. Please refer to the Traffic section in the EIR.

149

149. The proposed street improvements are to mitigate impacts to circulation within the community; it is beyond the scope of the community plan and this EIR to propose measures to alleviate regional transportation impacts.

Mitigation proposed under the Biological Resources section arguably impacts traffic circulation and air quality and appears to be inconsistent with recommendations included under the Traffic Circulation section. One mitigation proposed would eliminate the Camino Ruiz alignment within the community because it is near an existing wildlife corridor. An alternate connection from the neighborhood to SR 56 is not proposed. The impact of its removal is not addressed but could be significant whether or not the alignment crosses Penasquitos Canyon.

150

150. Refer to response No.69 and No.83.

Another mitigation recommends adoption of an alternative land use plan for Black Mountain neighborhood which would eliminate extension of Paseo Valdear to Penasquitos Drive. The impact of this measure is not addressed. Elimination of this extension from the plan will have some impact on circulation and air quality due to resulting longer, more circuitous and out-of-direction travel which would result.

151

151. Refer to response No.69 and No.71.

Yours truly,

Charles Woolever

Charles Woolever

SOPAC
REAL ESTATE GROUP

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April 29, 1992

Mr. Lawrence C. Monserrate
Principal Planner
Environmental Analysis/Public Projects
Development and Environmental Planning Division
CITY OF SAN DIEGO
202 "C" Street
San Diego, California 92101

VIA FEDERAL EXPRESS

Re: Comments Regarding the Draft EIR for the Rancho Penasquitos Community Plan Update

Dear Mr. Monserrate:

SoPac Properties, Inc. is currently processing a Tentative Map, Resource Protection Ordinance Permit, Rezone and Environmental Impact Report (EIR) for a 231 acre parcel located in the Penasquitos East Community Plan, Black Mountain Neighborhood. The Notice of Preparation (NOP) of a Draft Environmental Impact Report (Draft EIR) was recently distributed by the City of San Diego, Development and Environmental Planning Division (DEP NO. 91-0776). As the planning and environmental review of our project, referred to as Paraiso Cumbres, is closely linked with the Community Plan update, we have reviewed the Draft EIR closely. After review of the Draft EIR, SoPac Properties, Inc. has several areas of concern as described below:

The Draft EIR references, on page 17, fourteen intersections in the Penasquitos Community Plan will operate at LOS C or better at buildout both with or without Camino Ruiz. A table summarizing the intersections analyzed and their respective levels of service under a.m. and p.m. peak hour periods should be provided. 152

The graphic (Figure 7) showing recommended street classifications needs to be corrected to show Carmel Mountain Road between Penasquitos Drive and Interstate 15 as a six-lane prime arterial instead of a six-lane major street. Carmel Mountain Road should be shown as a six-lane major street between Paseo Montalban and Rancho Penasquitos Boulevard. 153

A considerable amount of space in the biological section of the EIR

152. Refer to response No.112. In addition, refer to the memo (included with comments) from E&DD which provides corrections to the EIR and the LOS table.

153. Based on revised recommendations from E&DD, the EIR has been revised to change the ultimate designation of Carmel Mountain Road to a five-lane major with three eastbound and two westbound lanes. In addition, E&DD's recommendation is to improve Rancho Penasquitos Boulevard to a five-lane major between Carmel Mountain Road and Azuaga Street. Figure 7 shows recommended street classifications. (Refer to memo from E&DD included in comments).

is devoted to discussion of wildlife corridors and the adverse effects of interference with wildlife movement cased by development. Page 35 of the Biological section describes the adverse effects of habitat isolation and corridor interruption. The one active corridor identified in the Penasquitos Community is described as a link between Los Penasquitos Canyon and Deer Canyon along the Camino Ruiz alignment. No functional definition of "wildlife movement corridor" is ever provided. It is unclear what type of animals would be expected to use a corridor (with the exception of the three species identified by tracks), or what level of animal activity would qualify for the use of the term. When the adverse effects of corridor interruption are described, there appears to be little distinction between habitat fragmentation or isolation and corridor interruption.

154

Fragmentation of the open space within the Black Mountain Neighborhood is identified as a significant adverse effect on page 39. While the concepts of habitat fragmentation and the creation of habitat "islands" is discussed at some length, there is no real discussion of the substantial body of literature concerning this subject, nor is the literature referenced. The dynamics of species isolation and minimum population sizes are complicated; in this instance they have been reduced to assumptions that the residual open space areas existent after development of the Black Mountain Neighborhood will be insufficient in size to support substantial native fauna. What is the basis for this assumption? A potential mitigation of this impact is seen as creating opportunities where people (and presumably their pets) can "access nature." Ironically, under this mitigation scenario, the very activities which impact native open space surrounded by urbanization are now being promoted and intensified.

155

Mitigation for the identified significant adverse impacts associated with development of the Black Mountain Neighborhood in accordance with the Updated Community Plan is described on Page 42 and 43 of the EIR. Mitigation is stated to consist of "clustered development." It is further stated on page 43 that "...by compacting development, the need for the extended alignment [of Paseo Valdear] is eliminated." Precisely where this "compacted development" is to be located is not made clear in the EIR section. In the "Compacted development/increased density" alternative discussion on page 56, however, it is stated that the alternative involves "...clustering the remaining permitted units at the lower elevations near existing development. This would result in higher densities over a smaller area." The objective of this argument for placing future denser development in close proximity to existing development is unclear. In the case of the Paraiso Cumbres property, an attempt to concentrate new development adjacent, or in

156

154. The terms "wildlife corridor" and "habitat fragmentation" are well defined in technical biological literature; the EIR is considered to provide an adequate context for these terms.

155. As stated in the EIR, the intent of this mitigation is to encourage people and their pets to use the areas which have been isolated from large contiguous corridors. Habitat value in these is lower because of the fragmentation (and for other reasons) and scientific literature shows that diversity decreases over a period of time in these fragmented areas. By encouraging people and pets to use the areas that will have reduced values over a period of time, by virtue of the fact that they are surrounded by development, it is anticipated that the larger contiguous areas would receive less use and retain their higher values.

156. The EIR is not intended to address specific development proposals. The intent of the alternative, formulated consistent with the generalized community planning level, is to remove development from the upper and highly visible slopes of Black Mountain. The EIR does not address whether a particular property would be developed.

close proximity to, existing developed areas would result in the placement of higher density residential development on very steep slopes. Such development would be at odds with the Resource Protection Ordinance, and would have little chance of approval.

The deletion of the through construction of Paseo Valdear is presented as a "Public Facilities Alternative" on page 54. It is stated that the Engineering and Development Department has determined that the road "...may not be essential to the efficient circulation patterns in the community." It is concluded that "Adoption of this alternative would likely not affect traffic circulation in the neighborhood." No data or results of analysis to substantiate these statements are presented. Traffic circulation analysis currently underway for the Paraiso Cumbres project suggests that channeling all project traffic southwest towards Black Mountain Road would adversely affect already severely impacted intersections.

157

157. Refer to response No.69 and response No.71.

A "Very low density (R1-40,000)" alternative is presented for the Black Mountain Neighborhood on page 55. It describes the reduction of densities over the entire remaining developable area. It is unclear what the objective of this exercise would be. Given existing regulatory constraints such as the Resource Protection Ordinance, and the Planned Residential Development Ordinance, it is very unlikely that a density of even one unit per 40,000 square feet could be achieved. The Paraiso Cumbres project, for instance, proposes development of 227 units over 231 acres under current regulations.

158

158. This alternative has been revised to show retention of the A-1-10 zoning in the area. The intent is to have a very low density residential development and to retain open space.

Thank you for the opportunity to express these concerns. It is our sincere hope that, as the Community Plan Update process proceeds, the currently proposed Paraiso Cumbres project can be accounted for in the plan and in the plan alternatives. In this way, the planning and development of the Black Mountain Neighborhood and related infrastructure can proceed in a coordinated manner.

Sincerely,

SOPAC PROPERTIES, INC.

Kelli Ryan Politoske
Vice President

KRP:js

Larry M

CITY OF SAN DIEGO

MEMORANDUM

RECEIVED

MAY 0 5 1992

ENVIRONMENTAL ANALYSIS SECTION

FILE NO. : WPME-332.MEM

DATE : April 22, 1992

TO : Planning Dept., Development & Environmental Planning Division, Principal Planner Larry Monserrate

FROM : Park & Recreation Director

SUBJECT : Rancho Penasquitos Community Plan Update - DEP No. 89-1222

This is in reference to the Public Notice of Draft Environmental Impact Report, DEP No. 89-1212, for the Rancho Penasquitos Community Plan Update.

Following are comments relative to open space and park issues. 159

159. Comments noted.

OPEN SPACE COMMENTS

Page/Item	Comment
1. Pages 26-29, Industrial Element	It should be noted that steps to mitigate this loss of open space easement are currently being pursued, in the form of a swap for a more desirable open space parcel to the south of this parcel.
2. Page 31, 3rd paragraph	A. Third sentence, change to read, "The preserve is approximately ~~50,000~~ 3,500 acres..." B. Last sentence, change to read, "to maintain ~~the--topographic~~ a corridor connection..."
3. Pages 39 & 40, mitigations	We concur with the elimination of the remnant stretch of Camino Ruiz and of the full extension of Paseo Valdear. If this is not possible, then adequate, species-usable wildlife corridors must be provided for.
4. Page 42, 1st paragraph	See comment number 3. We assume that the "Penasquitos East neighborhood" should be "Penasquitos Creek."
5. Page 42, 2nd paragraph	See comment number 1.
6. Pages 51-58, Alternatives	We recommend the adoption of the following alternatives: 2c) Camino Ruiz in the Penasquitos Creek and Parkview Neighborhood; 2d) Paseo Valdear; and 3c) Open Space Policies

PARK COMMENTS

There are no comments relative to park issues or the adequacy of the Draft Environmental Impact Report.

GEORGE I. LOVELAND

VM:cht

May 1, 1992

RECEIVED
MAY 1 1992
PLANNING DEPT

City of San Diego
Planning Department
Development & Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

RE: Rancho Penasquitos Community Plan Update Environmental Impact Report. Rep. No. 89-1222

Dear Lawrence C. Monserrate:

I have recently had the opportunity to review The Public Notice of Draft Environmental Impact Report for the Rancho Penasquitos Community Plan Update (Public Notice) and the Draft Environmental Impact Report for the Rancho Penasquitos Community Plan Update (Draft & EIR)

I can appreciate the complexity of the task of assembling the information that goes into an EIR, and the work that goes into writing an EIR. I, therefore, welcome the opportunity to be part of the process.

I believe there is one element of the Draft EIR,which is touched on in the Public Notice and which is inaccurate.

On page 5 of the Public Notice under Summary of Alternatives Section 2 Public Facilities Sub-Section "C" Elimination of Camino Ruiz in Penasquitos Creek Neighborhood. It states: "This alternative would only be feasible if it is determined that Camino Ruiz will not be constructed as a through arterial", and goes on to state: "This alternative would eliminate a section of Camino Ruiz that may not be critical to circulation in the community."

Comment: Camino Ruiz north of Park Village Drive will intersect with Carmel Mountain Road, which will extend southwest from its presently built location at Sundance Street. Camino Ruiz will then proceed north to an interchange at future State Route 56. (See figure 10 from the draft EIR).. This completes a vital and critical link to the Rancho Penasquitos circulation element.

The statement that the elimination of Camino Ruiz in Penasquitos Creek Neighborhood would eliminate a section of Camino Ruiz that may not be critical to circulation in the community can not be supported by even a casual observation of Figure 7 of the draft EIR (see attached), which shows that section of Camino Ruiz recommended as a four (4) lane major arterial, even without Camino Ruiz crossing the canyon.

160

160. Refer to response No.114.

A study of Figure 6 of the draft EIR (see attached) which shows traffic counts on that section of Camino Ruiz to be 8,000 ADT at build out.

If the Section of Camino Ruiz in Penasquitos Creek Neighborhood were to be eliminated all of the eight thousand ADT on Camino Ruiz would be dumped on Black Mountain Road at Park Village Road. Black Mountain Road will already be at 70,000 ADT on this section according to Figure 6 of the draft EIR (see attached).

The unavoidable conclusion is that Camino Ruiz, including its presently completed portion, the portion to be built in the Penasquitos Creek Neighborhood, and the northerly continuation to State Route 56, is a critical, and vital part of the basic road way network of the Rancho Penasquitos community.

Please look at these sections of the draft EIR

Page 13, Paragraph 2
Page 39, Mitigation paragraph
Page 53-54, Section C

Comment: While there would be visual impacts from the construction of the Penasquitos Creek portion, it would not be significant when looked at as a part of the build out of the entire neighborhood. Please look at page 42, paragraph 2 of the draft EIR.

161

Comment: The natural drainage and wild life corridor in the vicinity of the alignment of Camino Ruiz in the Penasquitos Creek Neighborhood is already disturbed by the built portion of Camino Ruiz to the south and Park Village Road which crosses perpendicular to this area.

162

Camino Ruiz as planned would not interfere with a viable wildlife corridor.

Once again I would like to thank you for the opportunity to be a part of the EIR process.

Please look at these sections of the draft EIR:

Page 38, Paragraph 6 & 7
Page 39-40, Mitigation paragraph
Pace 53-54, Section c.

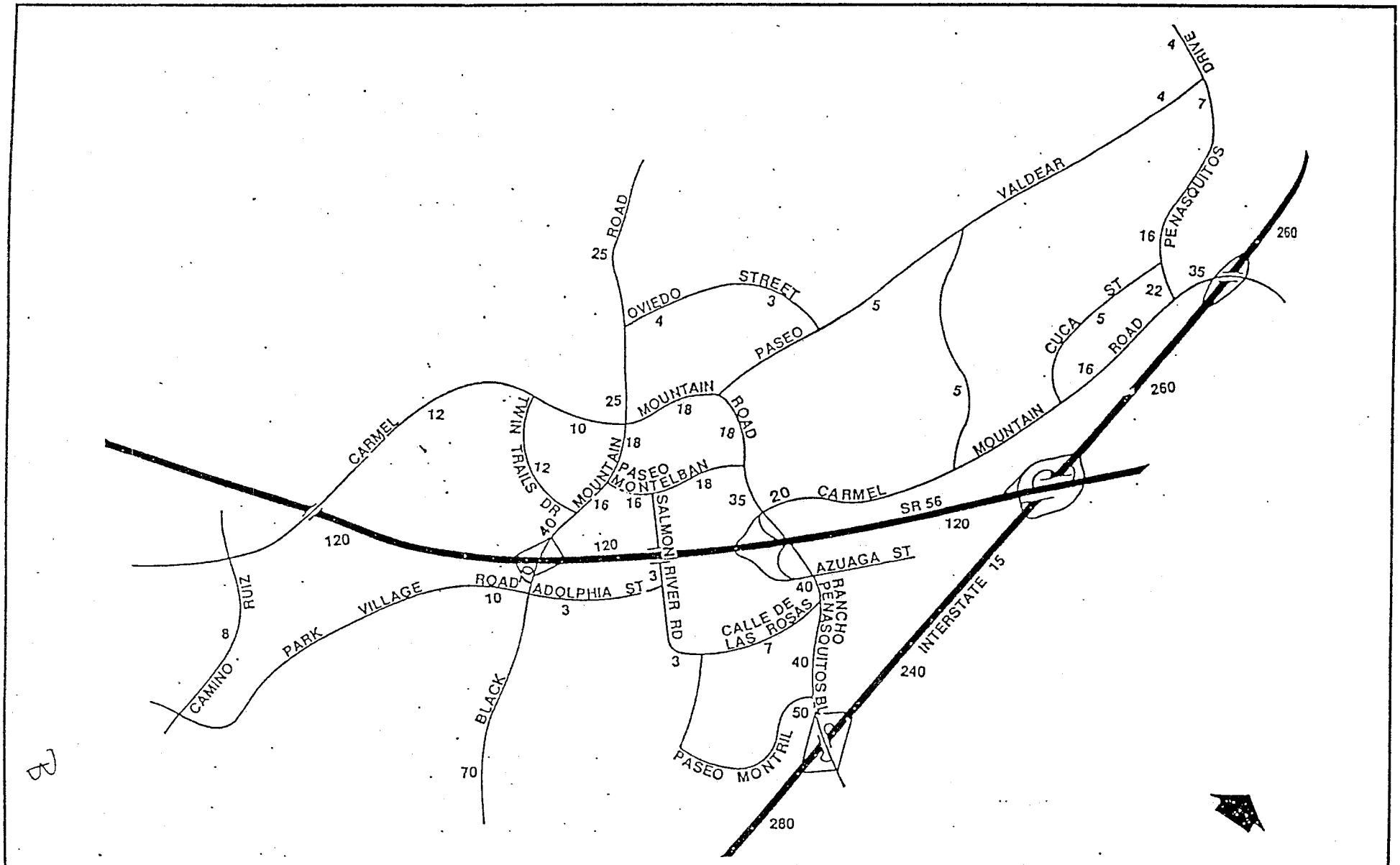
Sincerely,

Keith B. Rhodes

Keith B. Rhodes
1934 Estela Drive
El Cajon, CA 92020

161. The EIR is disclosing the impact of further grading which would be visible within the public viewshed of Los Penasquitos Canyon Preserve. It is not making a comparison with the visual impacts of overall community development.

162. Refer to response No.82.

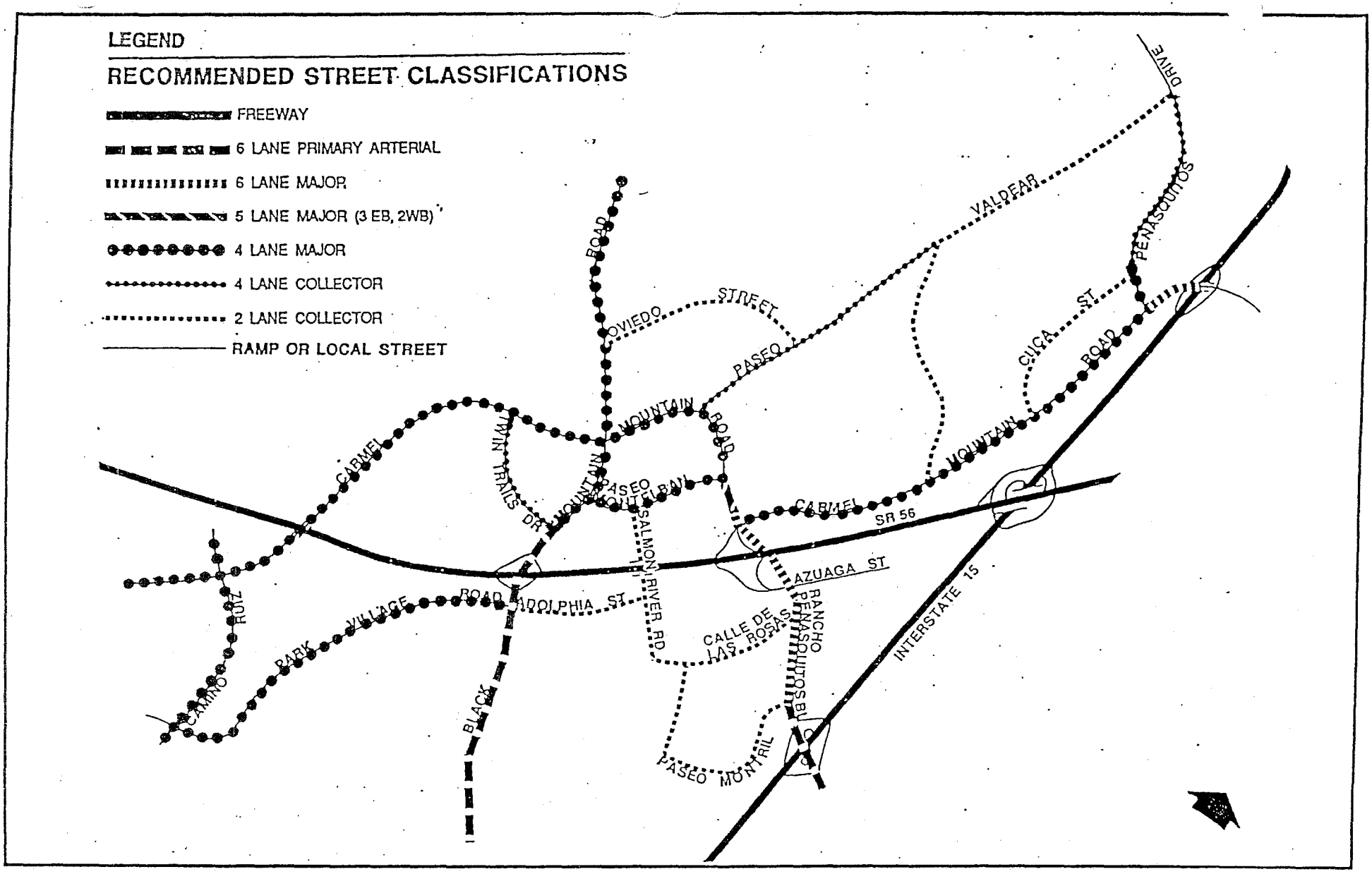


RANCHO PENASQUITOS

AVERAGE DAILY TRAFFIC (in thousands) AT BUILDOUT

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 6

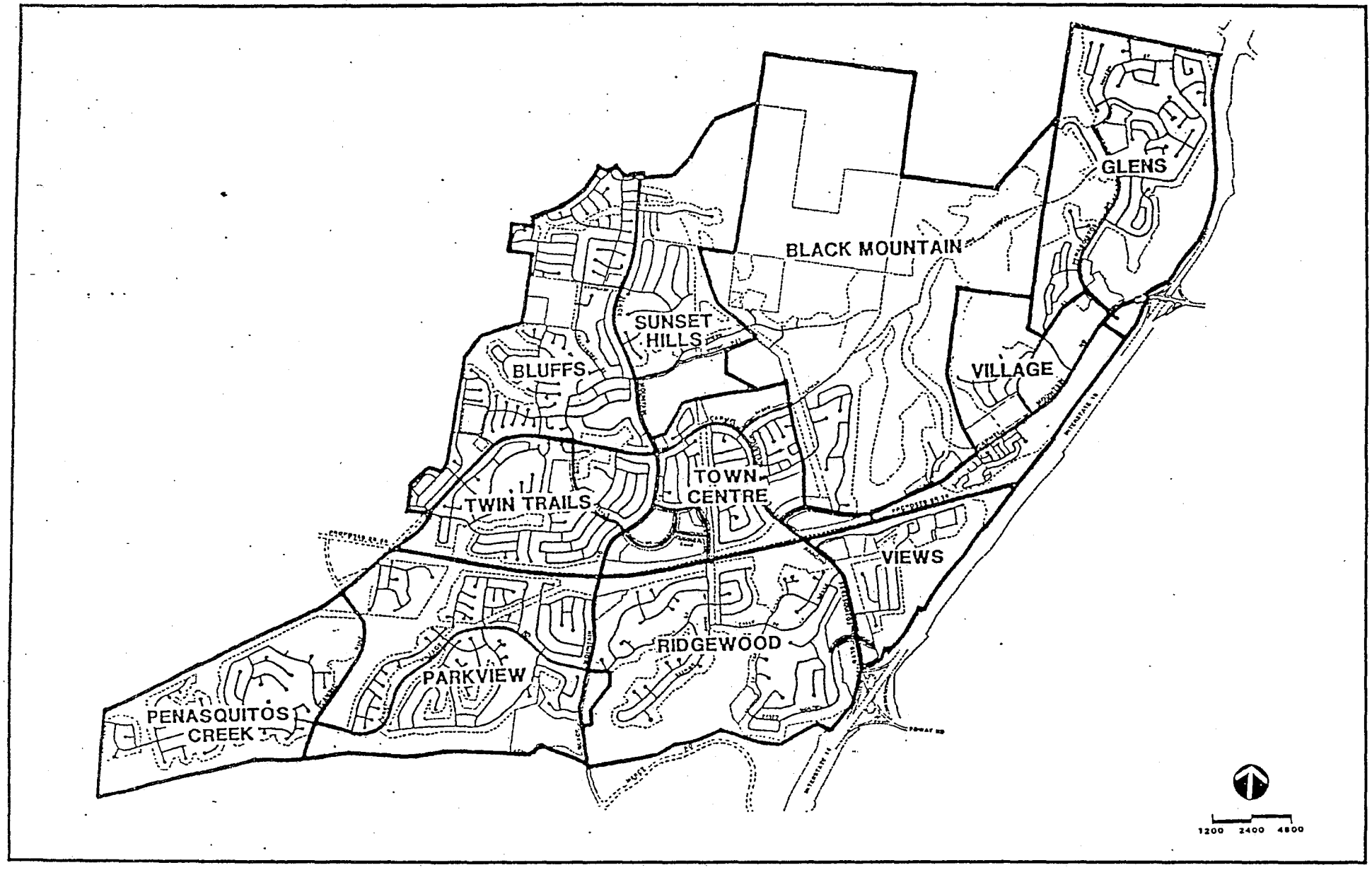


RANCHO PENASQUITOS

RECOMMENDED STREET CLASSIFICATIONS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 7



RANCHO PENASQUITOS

NEIGHBORHOOD CONFIGURATIONS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 10

PSW MANAGEMENT
4917 Amador Drive
Oceanside, CA 92056

MR. LAWRENCE C. MONSERRATE, Principal Planner
Environmental Analysis Section / Public Projects
CITY OF SAN DIEGO Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA 92101

April 29, 1992

Dear Mr. Monserrate,

PSW Management represents Mr. Leslie & Mrs. Ruth Harlan, owners of an 80-acre parcel (APN 313-010-59) located west of Penasquitos Drive at Avenida Maria & Calle Juanito and north of the eastern section of proposed development Project #91-0776 termed PARAISO CUMBRES. Of our 80 acres, approximately ±50 lie within the FUA, and ±30 within the PUA and the Penasquitos Planning Area. I have read with great interest the current DRAFT ENVIRONMENTAL IMPACT REPORT (DEP #89-1222, SCH #91061052) issued by your department. I speak for the Harlans herein.

As a resident of North County and a realist, I am a proponent of enlightened development, and support the concepts of prudent general and community planning. Your document is based on certain pre-suppositions or "givens". In this case, the basis of the document appears to be the current Community Plan in all its forms and definitions. If this is the case, and if those underlying principles do not change, I commend you on a work well done; I believe it is generally clear and forthright. However, I am not convinced that this is the case, and if underlying principles, such as Land Use (your figure 3) are altered, I can no longer support this EIR. I wish to see all present criteria such as zoning and land use remain unaltered, with only minor exceptions. If changes are adapted, I wish to be informed, so that all relevant documents can be re-evaluated accordingly.

In addition, I do have a few specific concerns and criticisms which I would like to formally submit herein.

On page 2 it is agreed that "some portion of the existing sensitive resources will be lost to development"; however, in the next paragraph you conclude that "residential development of remaining undeveloped parcels in the community would result in significant landform/visual quality impacts." I take exception to this verbiage, for until the full scope and design of proposed and approved development is known, the degree of impact is pure hypothesis. (You seem to concur with this on Page 5 where you state "Significant impacts likely to be mitigated with future discretionary permits".) 163

Further on page 2 you state that "The encroachment of development on such a prominent landmark as Black Mountain...contributes incrementally

163. In the conclusions, under the heading "Significant Impacts Likely to be Mitigated" impacts in the areas of hydrology/water quality, cultural resources and land use are included. As stated in the EIR, traditional grading techniques in the area have included terracing resulting in the cutting of hilltops and the filling of canyons to create flat pads. This loss of native landforms is anticipated based on the community plan and is considered significant. The continued conversion of native vegetation and landforms to development is not likely to be mitigated by future projects, but the EIR does not preclude the possibility.

to the reduction in visual diversity in the City as a whole". To be clear, I am in favor of the designation of Black Mountain Regional Park, and the establishment and protection of environmental tier, wildlife movement corridors and open space islands for recreational use; but, in my opinion, the mountain cannot be admired for it's visual beauty when it is covered with a cluster of communications antennae. This may seem like an obvious point and meaningless detail, but I firmly believe that it is such misstatement of fact and exaggeration that results in setting parties against each other, disallowing compromise and amicable resolution.

Discussions of biological and other sensitivities, impacts and mitigations are justified; rational individuals should not participate in the methodical destruction of endangered species. However, at the same time must be reckoned property owners' rights--which also serve the needs of the community as a whole for adequate housing. Therefore, it is important to respect encroachment allowances as set forth by the Resource Protection Ordinance.

It appears that there is some controversy over the need for Paseo Valdear. This road was conceived as part of the Community Plan, and constitutes an integral part of the overall logic of the Community Plan. I support it's inclusion, and am certain that, in time, every resident who lives and drives in the immediate area will agree. Here again I object to wording regarding the environmental impact presented by the construction of this road. Your report speaks of creating an open space island to the southeast of this road, and alleges that this would result in "reduced habitat diversity, interference with effective ecologic balances, and a reduction in the value of the open space". Also alleged is that the construction of this road would result "in the direct loss of chaparral and potentially in the loss of coastal sage scrub". Finally, you state that "extension of this road would discourage planning of clustered development".

I question the conclusions derived concerning habitat and ecology; the "island" in question is relatively small and directly borders existing development. The statement regarding chaparral is clearly not environmentally significant, and the loss of coastal sage is only potential. Further, I see no rationale to the blunt and unsubstantiated statement that this road would discourage clustered development.

Finally, I point out that if PARAISO CUMBRES is significantly restricted, especially in it's northeast quadrant, the Harlan property will be virtually landlocked and it's value severely diminished. To avoid the use of public funds for acquisition of this parcel, I urge that clustered development be permitted in PARAISO CUMBRES up onto the Harlan property, as shown on your figures 2 & 3. I am working with a civil engineer to complete preliminary planning of very low-density (1 du/4 gross acres) residential use of only ±25 acres of Harlan's property. We anticipate dedicating the remaining ±55 acres as open space reserve. Please note that this ±55 acres is contiguous to open space owned by Black Mountain Ranch to the east, which propagates the concept of connected open spaces.

I look forward to co-operation of all factions in the creation of community plans and property development which benefit all citizens.

Paul Weklinski for Leslie & Ruth Harlan

POWAY UNIFIED SCHOOL DISTRICT

13626 TWIN PEAKS ROAD • POWAY, CA 92064-3098
(619) 748-0010 • (619) 586-7500 • Fax (619) 748-1342
"... serving the communities of Poway, Rancho Bernardo, Rancho De Los Penasquitos, Sabre Springs, and Carmel Mountain Ranch"

DR. ROBERT L. REEVES
SUPERINTENDENT OF SCHOOLS

PLANNING
Alicia Kroese, Director
(619) 679-2570

RECEIVED
MAY 0 8 1992
ENVIRONMENTAL ANALYSIS SECTION

May 5, 1992

Mr. Lawrence C. Monserrate
Principal Planner
City of San Diego
202 C Street, MS 4C
San Diego, CA 92101

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT
RANCHO PENASQUITOS COMMUNITY PLAN UPDATE

Dear Mr. Monserrate:

Today, I received a copy of the Rancho De Los Penasquitos Planning Board May 6 meeting agenda. Attached to that agenda is a copy of the Draft Environmental Impact Report for the Rancho Penasquitos Community Plan Update. The document states that written comments regarding the adequacy of the Draft EIR must be received by May 1. Recognizing that today is May 5, I hope you will accept and still have an opportunity to consider my comments in the preparation of the Final Draft.

The corrections that I have are merely updates for your document. The map on page 47 should have Item K, (Adobe Bluffs Elementary), reflected in the existing or under-construction category. Adobe Bluffs Elementary School is currently under construction and will be completed in the 1992 year. The Adobe Bluffs Elementary School boundaries were approved by the Board of Education on March 23 and the school will form on the Sunset Hills Elementary School campus this September. The Park Village Elementary School and Mesa Verde Middle School, (J and K), are currently in planning. Construction on Mesa Verde Middle School will begin this summer. Construction on Park Village Elementary School is planned for fall 1992. 164

With these changes to your schools map on page 47 in place, you will, therefore, note the need to change some language in paragraph 2, page 48. It is true, the proposed plan shows two schools in the Future Urbanizing Area. The next sentence might be changed to read: "According to the Poway Unified School District, which provides public school facilities for Rancho Penasquitos and Rancho Bernardo, (City of Poway and County of San Diego), the Adobe bluffs Elementary School and Mesa Verde Middle School are needed to relieve overcrowded conditions at the existing facilities in those communities." I would suggest you change the last sentence in that paragraph to read: "With the addition of Park Village Elementary School, these three schools would provide excess capacity for future growth in the existing communities." 165

164. Comment noted. The EIR has been revised to show the two schools under construction.

165. This section of the EIR is to analyze the growth inducing impacts locating the schools in the urban reserve, not whether the schools are needed to relieve overcrowded facilities. It is noted, however, that with the completion of the three schools, there will be excess capacity available. This may further the growth inducing impacts.

I do not agree with your next paragraph. The schools proposed for construction in the Future Urbanizing Area are needed to absorb over capacities at existing schools within the existing community. I believe it is subjective to state, "Public school construction in the Future Urbanizing Area induces growth by providing services and facilities. The absence of which could make future development more difficult." Historically, for your information, the request to include two additional school sites in the community plan update back in 1988 was precipitated by the fact that housing, growth, and student generation factors within the Rancho De Los Penasquitos planning area justified a need for two additional school sites to service the community plan as it existed in 1988. The intent of the School District and the need for the two additional schools have nothing to do with providing services and/or facilities for future development in the Future Urbanizing Area.

166

166. Comment noted.

If you have any questions, please call me.

Sincerely,

Alicia Kroese
Director of Planning

cr
290-92

SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
3820 Ray Street
San Diego, CA 92104

Janet Myers
Development and Environmental Planning Division
Planning Department
City of San Diego
202 C Street
San Diego, California 92101

RE: RANCHO PENASQUITOS COMMUNITY PLAN UPDATE

Dear Ms. Myers:

The Sierra Club has reviewed the draft Environmental Impact Report for the Rancho Penasquitos Community Plan Update and would like to offer the following comments and questions for response:

1. The Sierra Club supports the elimination of Camino Ruiz across Los Penasquitos Canyon and believes that elaboration on the EIR's discussion of significant impacts would have provided greater reason for the elimination of the canyon crossing.

While Camino Ruiz may have been identified in adopted circulation elements as a necessary component in the regional transportation system since the early 1960s, as stated in the EIR, a number of significant changes have occurred since then that warrant its re-consideration. First, in opposition to an assumption of the '60s, it has been generally demonstrated that expansion of the road circulation system does not eliminate (or even significantly reduce) traffic congestion over time. Secondly, acknowledging the futility of continually expanding the road system, there have been efforts, in recent years, to develop a comprehensive public transit system and to encourage carpooling. Third, while Los Penasquitos Canyon Natural Park did not exist in the early '60s when the regional transportation system was designed, its subsequent establishment has provided a positive, unique benefit to the region which could easily be destroyed if an outdated, outmoded regional transportation system is not re-evaluated. Fourth, it has been the intent of the Future Urbanizing Area Framework planning effort to establish a regionally significant open space system which would link Los Penasquitos Canyon with San Dieguito River Valley while eliminating the Camino Ruiz crossing.

The significance of the impacts of the construction of Camino Ruiz across Los Penasquitos Canyon are greater than those discussed in the EIR. In addition to the destruction of

valuable wildlife habitat and the disruption of wildlife corridors, there is the loss of dedicated parkland, the intrusion of visual and noise impacts into the park, etc. Furthermore, there was no mention in the EIR of the substantial community support for the elimination of the canyon crossing by Camino Ruiz.

All of these points, if further discussed in the EIR, would provide greater reason for the elimination of the Camino Ruiz. Further biological impacts caused by the northern segment of Camino Ruiz in the resource rich area of Penasquitos Creek and Parkview Neighborhoods could be reduced.

2. The EIR on page 29 states that "The analysis for development suitability and consistency with the Resource Protection Ordinance, as required by City Council Policy 600-40, was not conducted for the draft plan." Why was the analysis not done and what is the significance of not doing the RPO analysis in the Black Mountain area? It is appropriate that during a community plan update, there be conciliation between the community plan and the adopted resource protection regulations. The only mitigation for the impact of not doing the analysis seems to be doing the analysis and revising the community plan if necessary. While the EIR states this, it does not require the mitigation. Will the council have to make findings of overriding consideration in order to approve a community plan which has not completed required analysis? What findings would substantiate an overriding consideration?

The EIR did not relate the proposed community plan to the Environmental Tier studies which have been done in the Future Urbanizing Area, adjacent to the Black Mountain Neighborhood. Black Mountain is a key component of a proposed regionally significant open space system. The development on Black Mountain, if any, should be consistent with and sensitive to those plans. The community plan should include density and/or clustering requirements and language, as proposed in Alternative 4-c, recommending open space policies to encourage use of the "island" open spaces and encourage limited access to the open spaces which would remain connected to a large regional system. The failure to do would result in an unmitigated significant impact on the future establishment of the regional open space system. What findings would substantiate approval of a statement of overriding consideration?

3. The EIR did not discuss the how the city intends to protect coastal sage scrub and vernal pool habitat, both on the verge of extirpation in San Diego. Is the city participating in the state NCCP program? Why does the plan not include language that vernal pools are a sensitive resource and require

167

167. Findings are required to be adopted regarding the environmental alternatives prior to approval of the draft community plan.

168

168. These comments do not directly address the adequacy of the EIR.

conditions that future projects to avoid or fully mitigate impacts? Does the city have any monies remaining in the Vernal Pool Mitigation Fund or in the RPO Mitigation Fund which might be used to acquire the vernal pool areas?

Thank you for giving your attention to our questions and concerns regarding this community plan update.

Sincerely,

Linda Michael

Linda Michael
Land Use Committee
223-9405

cc:

SDGE San Diego Gas & Electric
P.O. BOX 1831 • SAN DIEGO, CA 92112-4150 • 619/696-2000

April 29, 1992

FILE NO.

Mr. Lawrence C. Monserrate, Principal Planner
City of San Diego
Planning Department
Development and Environmental Planning Division
202 "C" Street, Mail Station 4C
San Diego, CA. 92101

RE: RANCHO PENASQUITOS COMMUNITY PLAN UPDATE DRAFT EIR

Dear Lawrence,

Thank you for the opportunity to review the draft EIR. SDG&E has an electrical substation and several electrical transmission and gas lines within the boundaries of the proposed Community Plan Amendment. The approximate location of these facilities is indicated on attached copies of the EIR's land use plan exhibits.

The electrical transmission facilities include the following:

1. 230 and 138 kV transmission lines contained within a 200' wide right-of-way (R.O.W.) which runs from south to north approximately through the middle of the planning area.

2. 230 and 69 kV transmission lines contained within a 100' wide R.O.W. which runs along the most westerly boundary of the planning area.

3. A currently vacant 150' wide R.O.W. which is expected to be used in the future.

4. The Chicarita electrical substation located on Azuaga Street, east of Rancho Penasquitos Boulevard in the eastern portion of the planning area.

The major gas distribution facilities in the planning area include the following:

1. A 16" high pressure gas transmission line, which roughly parallels I-15, along the eastern boundary of the planning area.

Although the proposed plan amendment should not have a significant effect on SDG&E's ability to serve the current or future energy demands of the planning area, we would like to comment on the plan amendment's open space policies.

Several pedestrian path alignments shown in the plan will lie within or cross existing SDG&E electrical transmission R.O.W.s. The final locations of these pathways and any grading or other physical improvements for their future installation should be discussed with our Land Management Section.

The plan suggests that open space, within portions of the planning area, be defined in terms of its relative value. This open space concept would create lower-value habitat islands encouraged for neighborhood use and higher-value open space habitat with limited access. While we support the plan's efforts to provide and protect open space habitat, SDG&E must be assured that any policies adopted by the City to reserve open space will not preclude public utilities as an allowable use. SDG&E would also expect that the City's open space policies for the planning area would not inhibit our ability to access, operate and maintain our existing and future utility improvements.

Because a significant portion of the planning area is currently undeveloped, we anticipate that the maps and development plans for future improvements will be submitted to SDG&E for review prior to the City's final approval. A review of those future plans and maps will allow SDG&E a better opportunity to assess any encroachments within our rights-of-way.

Please call me if at (619) 696-2732 if you have any questions.

Sincerely,

Mark Chomyn

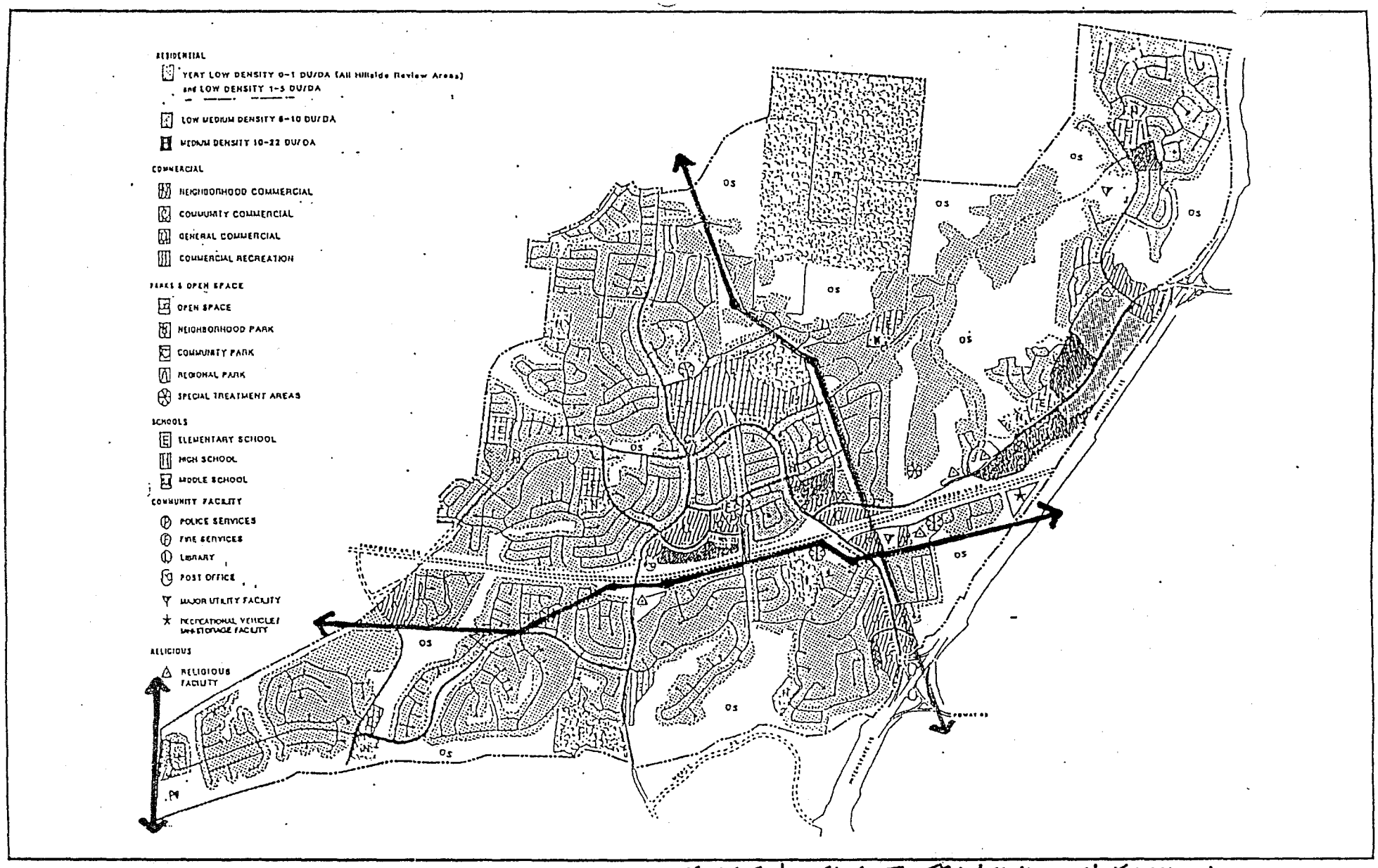
Mark Chomyn
Land Planner

Attachment

cc: J. B. Burton
D. L. Jones
R. W. Keithly

169

169. Comment noted.



EXISTING ELECT. TRANSMISSION FACILITIES

230 & 138 KV LINES IN 200' R.O.W. ——

230 & 69 KV LINES IN 100' R.O.W. ——

VACANT 150' R.O.W. ——

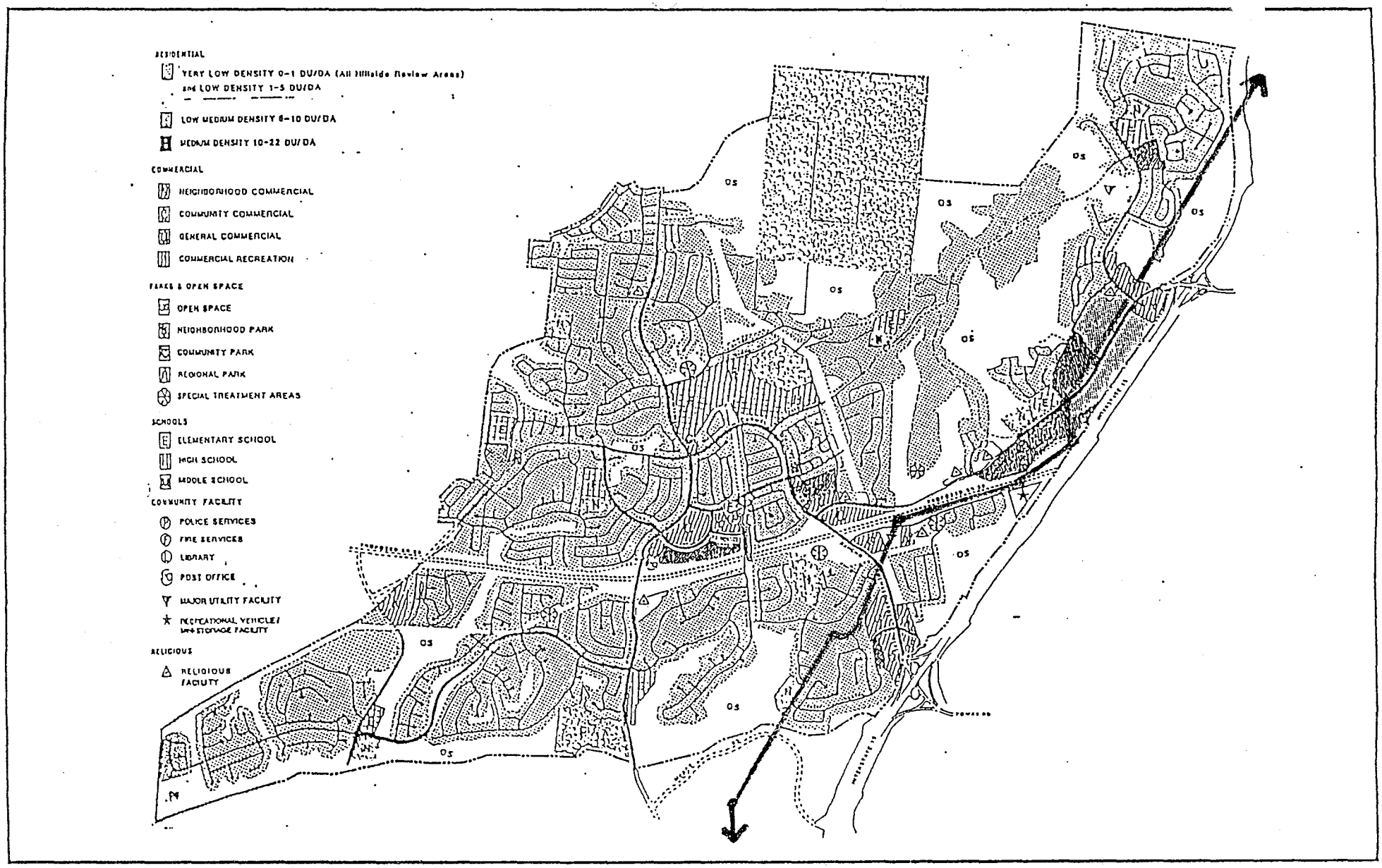
CHICARITA SUBSTATION

RANCHO PENASQUITOS

LAND USE PLAN

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 3



RANCHO PENASQUITOS

LAND USE PLAN

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 3

April 29, 1992

Lawrence C. Monserrate, Principal Planner
Development and Environmental Planning Division
202 "C" Street, M.S. 4C
San Diego, CA 92101

Re: Rancho Penasquitos Community Plan Update, DEP No. 89-1222, SCH No. 91061052

Dear Mr. Monserrate:

Thank you for the opportunity to comment on the adequacy, completeness, and objectivity of the draft Environmental Impact Report(dEIR) for the above project.

The Torrey Pines Community Planning Group is concerned with the impact that revisions of the present plan will exert on Los Penasquitos Lagoon, which is within our area of responsibility. As stated on page five of the Summary, incremental impacts to downstream water quality could result from increased siltation in Los Penasquitos Lagoon. Increased run-off and discharge into surface or ground waters certainly would increase the level of pollutants within the Los Penasquitos Lagoon, the destination of the several major drainages which traverse the project.

Also, as stated on page six, the proposal to contruct two public schools in the Future Urbanizing Area adjacent to the western boundary of the community induces growth by providing services and facilities, which would lead to greater traffic and air pollution on both I-5 and SR56, thus impactlng our area. The building of such facilities is also contrary to the goals and policies of the Future Urbanizing Area Planning as accepted by San Diego City Council.

On p. 6 of the dEIR, figures are given concerning the buildout of the community. However, no indication is given of the number of units already approved which have not yet been built. What is this figure?

Also, on p. 6, no reasons are given as to why unit density at Black Mountain are being increased from 275 to 450 units. Why is this being done, and what mitigation will be made for the increased density? Why is another project being decreased by 200 units? **170**

Designated open space is proposed to be converted to a recreational vehicle storage/mini warehouse use. What mitigation is proposed for the loss of the ten acres of designated open space? Why could not this facility be placed in Sabre Springs where there is already zoned land available? How does this project propose to reconcile the Resource Protection Ordinance provisions with these revisions to the Community Plan? **171**

Present plans for the future urbanizing area are indicating densities (15-25 dwelling units per acre) far greater than 2.5 dwelling units per acre as indicated on page 13. What impact will this have on the above project? **172**

In relation to the traffic "improvements" indicated on page 16, widening most of the thoroughfares is suggested. Since past experience has shown that the widened lanes only accomodate present traffic, what plans are presented to deal with future traffic and air pollution in this area? **173**

170. Refer to response No.99.

171. These comments are consistent with the EIR and do not directly address the adequacy of the EIR.

172. These impacts are addressed in the Draft EIR for the North City Future Urbanizing Area Framework Plan, which is currently undergoing public review.

173. There are no mitigation measures other than those proposed.

The Torrey Pines Community Planning Group for years has opposed extension of Camino Ruiz across Los Penasquitos Canyon. What is the value of retaining the option to do so, are you not just playing games with words in this respect? How does retaining an option mitigate anything? 174

Why is it necessary to build the schools in the area selected? Black Mountain is a regional landmark that can be viewed for miles. Should not this land form be retained as is? Does not a community have the responsibility of preserving such a landform for everyone? 175

Please do not construe these questions as opposition to or approval of the project. They are intended only to convey concerns regarding the adequacy, completeness, and objectivity of the draft Environmental Impact Report.

Thank you for your attention to these matters.

Sincerely yours,

Opal Trueblood, Chair
Torrey Pines Community Planning Group
13014 Caminito del Rocio
Del Mar, CA 92014

c: Janet Myers
Rachel Hurst
Mike Westlake
Abbe Wolfsheimer

174. The EIR is considered to provide adequate detail regarding the purpose and intent of the alternatives.

175. These comments do not directly address the adequacy of the EIR.

Friends of Los Peñasquitos Canyon Preserve

P.O. Box 26523, San Diego, California 92196
619-484-3219 • 619-566-6489 • FAX: 619-271-1425

Janet Myers
Development and Environmental Planning Division
202 "C" St., Mail Station 4C
San Diego, CA 92101

Re: DEP No. 89-1222, EIR for Rancho Penasquitos Community Plan Update

Camino Ruiz in the Penasquitos Creek and Parkview Neighborhoods

The portion of Camino Ruiz running from Park Village Drive north to the future Route 56 would severely impact an important finger canyon connecting Penasquitos Canyon Preserve to the Del Mar Mesa. It would impact a slope with good quality coastal sage scrub habitat, the home of the California gnatcatcher, a bird proposed for the endangered species list and expected to be listed this fall. It would also cut an important wildlife corridor that brings deer, bobcat, and other animals up onto the mesa top. This is a wildlife corridor that has been used for many years and is still being used. This portion of Camino Ruiz would also appear to impact vernal pool sites on the eastern edge of the Vista Alegre property. Enclosed are several photos of two endangered species found in several of these pools, including the Federally listed Mesa Mint and two types of Brodiaea: jolonensis and orcuttiae. The Mesa Mint is found in and abutting the disturbed area immediately east of the CalTrans Vernal Pool Preserve gate. Large patches of it abut the northern edge of the chaparral that borders the dirt road coming out of the Preserve going east, about 50 yards east of this gate. The Brodiaea can be found in openings in the chaparral, near vernal pools in the portion of the Vista Alegre project that lies between the Camino Ruiz finger canyon on the eastern edge of the project and the dirt road that crosses the project from north to south.

With the Camino Ruiz extension across Penasquitos Canyon Preserve expected to be eliminated this year, the portion of Camino Ruiz extending between Park Village Drive north to 56 would no longer serve its original purpose as a regional north-south route into Mira Mesa to the unofficial 56, Mira Mesa Boulevard. Eliminating this portion of Camino Ruiz would help protect the wildlife corridor, the coastal sage scrub and gnatcatcher habitat, the vernal pools and the endangered species listed above.

The sensitive nature of much of the Vista Alegre project, for the pools, the corridor and the endangered species, but also its role as a buffer for the CalTrans Vernal Pool Preserve, make it a good candidate for remaining as open space.

Wildlife Corridor

The Camino Ruiz wildlife corridor mentioned above would also benefit from planting of vegetation on the eastern portion of the new school site at Park Village Drive. With the grading the wildlife have scant cover to cross north into this finger canyon. The school should be encouraged to revegetate this eastern edge of their property to protect the wildlife corridor.

Air Quality

The EIR, in both the introduction to the report and in the body of the report itself, focuses on the impact on air quality of deleting Camino Ruiz. The report builds a case for these negative impacts on air quality by focusing on the change in traffic circulation caused by deleting Camino Ruiz. There are several things wrong with the treatment of air quality in this EIR.

1. Impact of other development: From the focus of the document's writers we're led to believe that of all the development activity detailed in the Community Plan Update, only the deletion of Camino Ruiz would have a negative impact on our air quality. Quite the contrary. Building the hundreds of additional commercial and residential units called for in the original Plan and its Update will attract tens of thousands of Additional Daily Trips between Rancho Penasquitos and Mira Mesa. What will the impact of these additional ADTs be compared with the deletion of the Camino Ruiz crossing? Surely the impact of these ADTs will be in the order of several magnitudes greater.

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176. As stated in the impacts section of the FEIR for the Mira Mesa Community Plan Update, development in accordance with the update, with or without the Camino Ruiz crossing would contribute to the degradation of air quality in the region. This represents a significant cumulative impact. The deletion of the Camino Ruiz crossing further exacerbates this problem. The traffic study prepared for this project demonstrates that deletion would result in traffic congestion on streets in Mira Mesa and freeways that are already projected to operate over capacity at peak hours. In addition, the deletion results in decreased levels of service at two intersections in Mira Mesa. Level of service E at an intersection typically results in 550 pounds of carbon monoxide emissions per day which is a significant air quality impact related to the project both individually and on an incremental basis.

2. Negative impact of removing vegetation. The EIR treats air quality as a one-way street, where the only possible impact on air quality is a negative one, of spewing additional nitrogen oxides, particulate matter and carbon monoxide into the air. The report never mentions the negative impact on air quality of removing vegetation from Mira Mesa. The report forgets the positive impact on air quality of the earth's vegetation, whether it be the algae of the ocean or the oak groves of Penasquitos Canyon Preserve, or the chaparral of our mesa tops and slopes. Where do they think our carbon dioxide goes to or our oxygen comes from? The report ignores the fact that plants remove particulate matter from the air. As the NASA tests showed, even the common house plant, the spider plant, is an effective "scrubber" of polluted air.

177

Building the Camino Ruiz extension across the Preserve will have a negative impact on air quality in the San Diego Air Basin by permanently destroying thousands of oxygen-producing trees and other plants. The area beneathe bridges has never been conducive to plant growth. For that matter, every new road and building built in Mira Mesa as the community moves toward build out will destroy countless plants, impacting the Air Basin negatively. Nowhere is this mentioned, never mind quantified in the report.

Quality of Life

The thrust of the EIR is that taking Camino Ruiz out will worsen the air quality and traffic circulation, i.e., worsen the quality of life.

178

1. Penasquitos Canyon Preserve is vital to quality of life

It's precisely over the quality of life in both Mira Mesa and Rancho Penasquitos that opposition to building the Camino Ruiz extension has centered. In numerous public forums, letters and petitions, residents have said that the park in its current condition is important to their quality of life. They don't need an EIR on the "potential" impacts of a bridge on the Preserve to know it would ruin the experience they enjoy when they look out on or visit the canyon. They don't need further study (Plan B) to know the impact on the plants and animals will be unacceptable. Penasquitos Canyon Preserve is so emotional an issue precisely because it's an important part of the quality of life in these communities, of why many people live where they do.

179

2. Overriding considerations and Plan B

The EIR proposes an alternative to deleting Camino Ruiz, this is to delay the decision on the bridge to allow more studies to be done. This is a bureaucratic maneuver designed to facilitate the building of the road. Any studies will undoubtedly be no more objective than the current one. Studies and EIRs have an uncanny way of reflecting the position of the people who commission them. Leaving the Camino Ruiz crossing in the Community Plan and the City of San Diego General Plan will make it a reality. That's how the section of Camino Ruiz crossing Park Village Drive was built. Despite community opposition, this section of road extending south from Park Village Drive into the Preserve was triggered by a developer agreement. It was on the map and it was required as part of the agreement. Many tens of thousands of dollars were wasted on building this portion contrary to the communities' wishes. Plan B, don't delete it, don't build it (yet), let's study it, is a bureaucratic maneuver designed to facilitate the future building of the road, hoping to wear down community opposition over time.

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The public has made it clear that the results of studies on the "potential" impact of building the Camino Ruiz bridge are irrelevant. The positive impact on the quality of life in our communities of the Preserve's existence is of such overriding benefit as to make moot studies purporting to show how "minimal" the impact might be. Don't waste the taxpayer's money by delaying the deletion of Camino Ruiz and funding more studies.

Sincerely,

Michael D. Kelly
President

177. Although there is much data to support your statement that vegetation is an effective "scrubber" of polluted air, staff is unaware that coastal sage scrub or chaparral is particularly effective for this task. While the comment seems to be directed toward Mira Mesa, the potential loss in vegetation from construction of a bridge over the canyon would affect Rancho Penasquitos also. It would be speculative to estimate the amount of vegetation that would be lost, and it is anticipated that mitigation for the loss would be required.

178. The EIR is intended to provide objective information and is not considered to have a particular thrust other than what is proven by the analysis.

179. Comment noted.

180. The purpose of an EIR is to state the impacts associated with the project and to offer alternatives to achieving the project goals but avoiding the impacts. Section 15043 of the CEQA Guidelines states that a public agency may approve a project even though the project would cause a significacant effect on the environment if certain findings are made and if there are overriding benefits to the community. The EIR prepared for this project allows the decision makers to make a fully informed and publicly disclosed decision. The alternatives presented in the EIR are required by Section 15126(d) of the CEQA Guidelines. Due to the impacts associated with the project, including of-site impacts, and the various alternatives, the EIR does not recommend one alternative over the other.

RANCHO PEÑASQUITOS COMMUNITY PLAN UPDATE

ENVIRONMENTAL IMPACT REPORT

DEP NO. 89-1222

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LIST OF FIGURES

I. INTRODUCTION

This Environmental Impact Report (EIR) has been prepared in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State of California CEQA Guidelines, as amended. This is an informational document intended for both the decision maker and the public and, as such, represents relevant information concerning the proposed update to the Peñasquitos East Community Plan (retitled Rancho Peñasquitos Community Plan), associated rezonings, and an amendment to the City of San Diego Progress Guide and General Plan to delete the extension of Camino Ruiz across Los Peñasquitos Canyon.

The City of San Diego Planning Department has conducted an Environmental Initial Study for the proposal and has determined that implementation of the proposed actions could result in significant environmental impacts. Therefore, the preparation of an EIR is required. Potentially significant issues include:

- incompatible land uses related to the proposed redesignation of open space to commercial recreational use;
- reduced visual quality related to landform alteration in the remaining undeveloped areas within the community, and the proposed conversion of open space to commercial recreational use;
- alteration of native landforms;
- direct and indirect impacts to biological resources particularly related to loss of coastal sage scrub, which is habitat for California gnatcatchers, and potential losses of vernal pools;
- hydrology and water quality may be affected by increased runoff as well as discharge of significant amounts of pollutants from urban run-off;
- transportation and circulation impacts related to elimination from the General Plan of the Camino Ruiz extension across Los Peñasquitos Canyon.

The analysis of these issues is broken down into sections describing the existing conditions, the potential impacts of the proposed plan, and mitigating measures for significant adverse impacts. The EIR analysis distinguishes between mitigation measures incorporated into the plan and additional mitigation measures necessary to reduce significant impacts to an acceptable level. Alternatives to the proposed plan that would avoid, reduce, or mitigate impacts are also discussed.

A Notice of Preparation (NOP) was distributed to various organizations, agencies and individuals in an effort to solicit comments regarding the scope and content of the draft EIR. A copy of the NOP and the responses that were received are on file at the Development and Environmental Planning Division of the City of San Diego Planning Department.

The Rancho Peñasquitos Community Plan Update is a proposal to update the currently adopted Peñasquitos East Community Plan, adopted in October 1978. An Environmental Impact Report (EQD No. 78-05-48, SCH No. 78070363) was prepared for the Peñasquitos East Community Plan. Numerous environmental documents have been prepared over the years to address various revisions to the community plan and private development projects. The plan has been revised four times to change land use designations on individual sites, to clarify certain aspects of the plan, and to require that new development be phased with provisions for public services and facilities. The previously prepared EIRs, as well as the other technical data and supporting information are incorporated into this EIR by reference. Those materials are available for review at the office of the Development and Environmental Planning Division of the Planning Department.

II. ENVIRONMENTAL SETTING

Project Location

The Rancho Peñasquitos community is located in the northeastern portion of the City of San Diego, approximately 17 miles north of downtown San Diego. The 6,500-acre community is bounded on the east by the communities of Carmel Mountain Ranch and Sabre Springs, on the south by the Los Peñasquitos Canyon Preserve and the Mira Mesa community, and on the west and north by lands designated as the North City Future Urbanizing Area (City of San Diego Progress Guide and General Plan) and the Rancho Bernardo community (Figure 1).

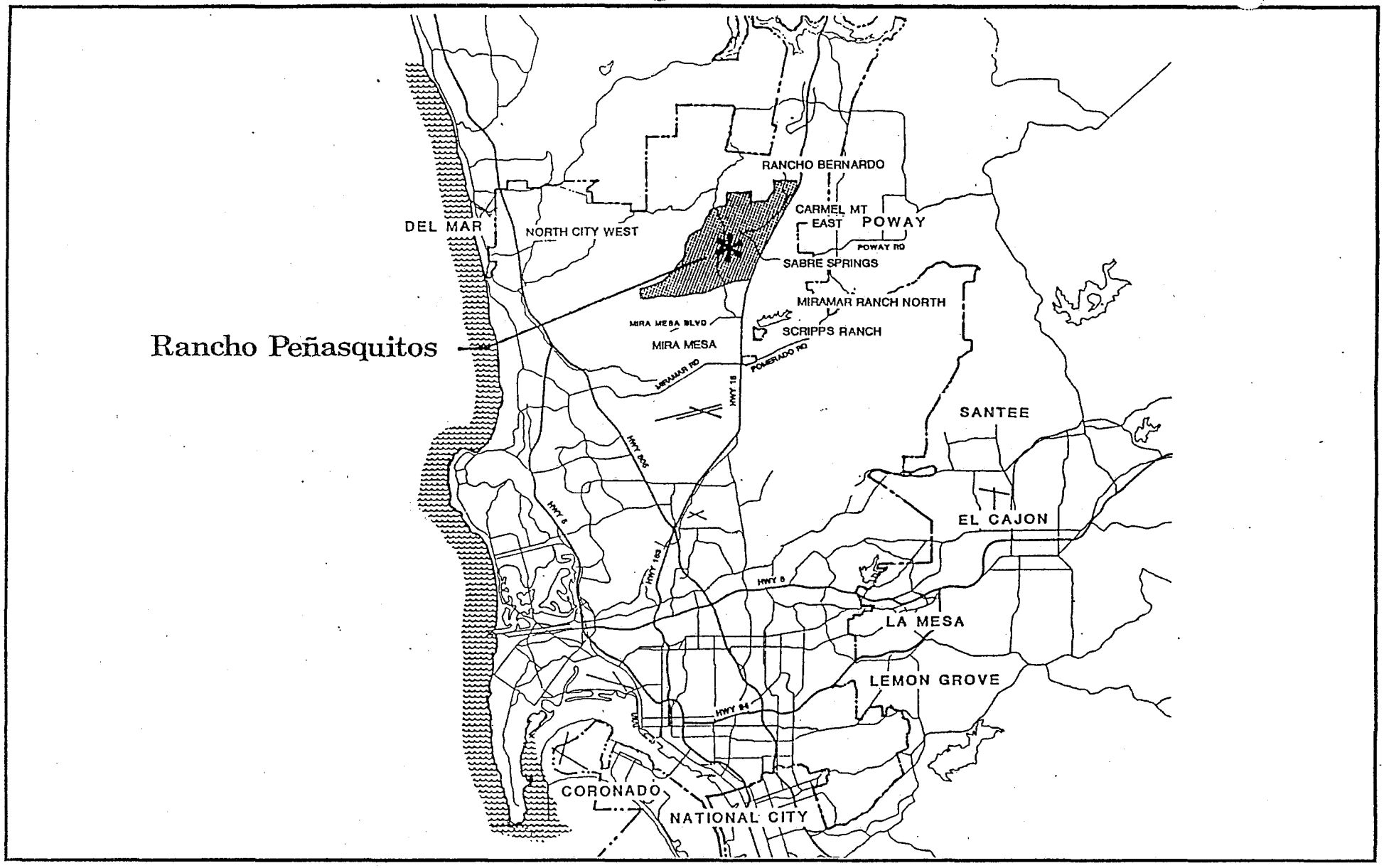
Access

Primary access to the community is provided by Interstate 15, which is the eastern boundary of the community. Proposed State Route 56 will provide access from the west when constructed. Interchanges with I-15 are located on Rancho Peñasquitos Boulevard and Carmel Mountain Road.

Topographic Characteristics

The southern portion of the community is characterized by stream-dissected mesas which appear as nearly level to gently sloping areas deeply incised by steep finger canyons which provide drainage of surface runoff to Los Peñasquitos Creek. The northern portion of the community is characterized by hilly terrain surrounding the prominent peak called Black Mountain.

Los Peñasquitos Creek, one of the prominent drainages in the region, is south of and adjacent to the community. The creek and associated canyon sideslopes have been incorporated into a preserve which provides important recreational opportunities and contains significant biological and cultural resources.



RANCHO PENASQUITOS

VICINITY MAP

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Figure
1

Biological Resources

Vegetative communities that exist in the area include chaparral, sage scrub, grassland, and vernal pool. The chaparral occurs at the higher elevations in the northern part of the planning area, and on the dissected mesas and sheltered slopes north of Los Peñasquitos Creek. The sage scrub is found at lower elevations and on slopes with generally more southern exposure than chaparral. Coastal sage scrub, which is dominated by coastal sagebrush (Artemisia californica), is the key habitat for the California gnatcatcher (Polioptila californica). Some grassland still occurs on the north side of Los Peñasquitos Creek. Since the larger grasslands were found on the generally level terrain, most of this habitat has been developed with residential neighborhoods. The vernal pool habitat is located on the mesa north of Los Peñasquitos Creek and east of the CALTRANS Vernal Pool Preserve, which is located in the North City Future Urbanizing Area.

Because of development patterns in the community, wildlife is found mainly in canyons and on preserved hillsides. The large undeveloped areas of Black Mountain and Los Peñasquitos Canyon have significant habitat value and have retained a large amount of natural diversity. The California gnatcatcher is present in the community. This songbird is a candidate for listing as an endangered species according to the federal Endangered Species Act.

Cultural Resources

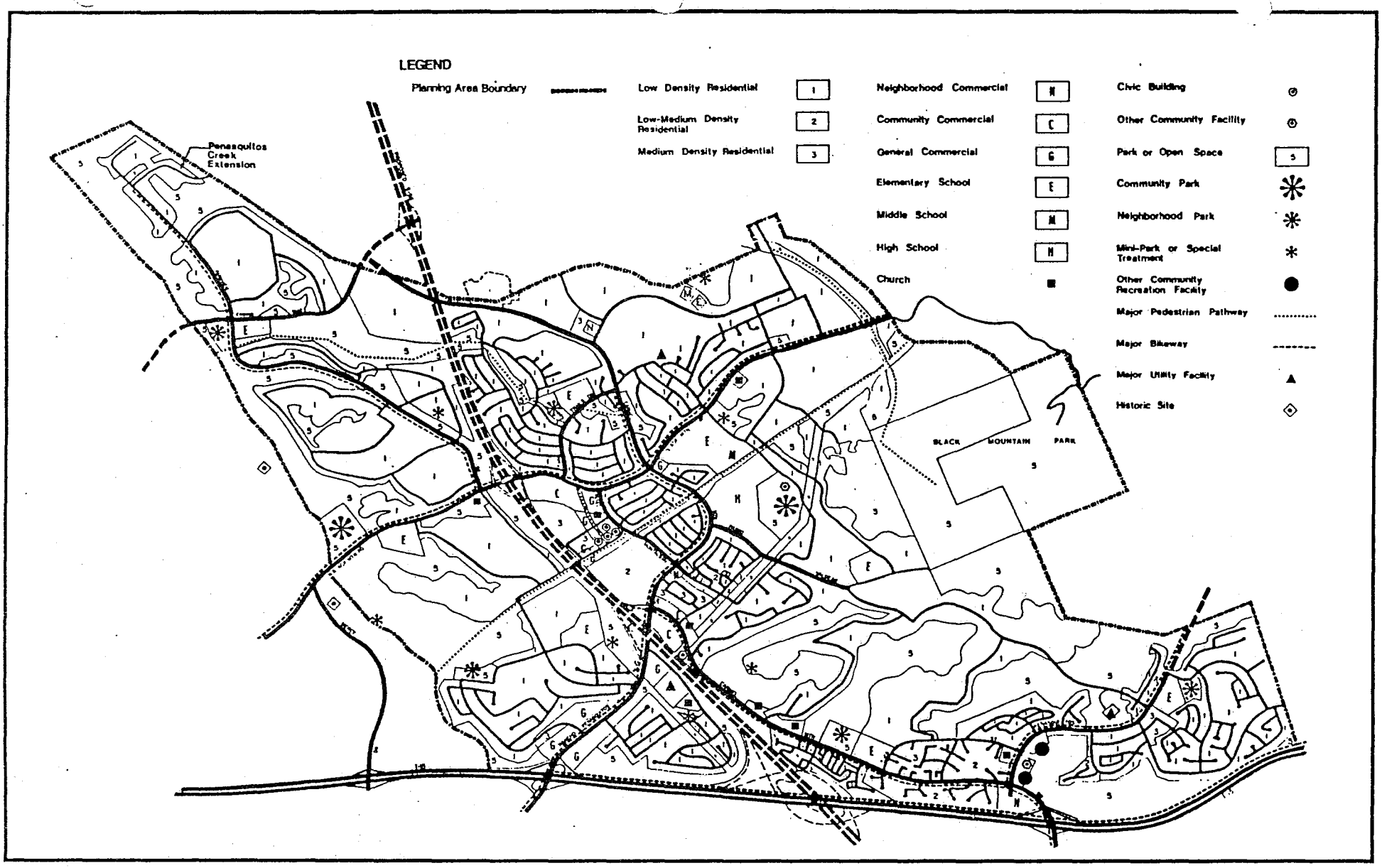
The community contains few prehistoric or historic resources. The Hampe Farmstead, located in the Bluffs Neighborhood, was a significant historic feature in that it represented an era of family-owned farms and farming communities which formed the basis for settlement in rural portions of the county. It has been demolished.

Los Peñasquitos Canyon contains many significant prehistoric and historic resources. The prehistoric occupation has been dated to 7,000 years ago. The sites include bedrock milling features, stone shelter walls, and village sites. Historic features in the canyon include three adobes, two trash dumps, and the concrete foundation and collapsed walls of a small frame house. The adobes range in age from 1827 to 1910.

The canyon provided an abundance of floral and faunal resources which were readily exploited by prehistoric populations, as well as settlers in the area in more modern times. In addition, the creek is a major drainage channel in the region, and as such is a fairly reliable water supply, which was an important habitat element.

Urban Setting

The adopted Peñasquitos East Community land use plan is shown in Figure 2. The proposed land use plan for Rancho Peñasquitos is illustrated in Figure 3.



PENASQUITOS EAST
LAND USE PLAN

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Figure
2

The Rancho Peñasquitos Community Plan designates the area for a wide variety of uses (primarily residential) including: various densities of residential development; public facilities and services to serve the existing and proposed residential development; and neighborhood and community serving commercial uses. Ultimate buildout of the community would result in a total of approximately 15,500 to 16,500 dwelling units and a population of approximately 49,000 to 53,000 people.

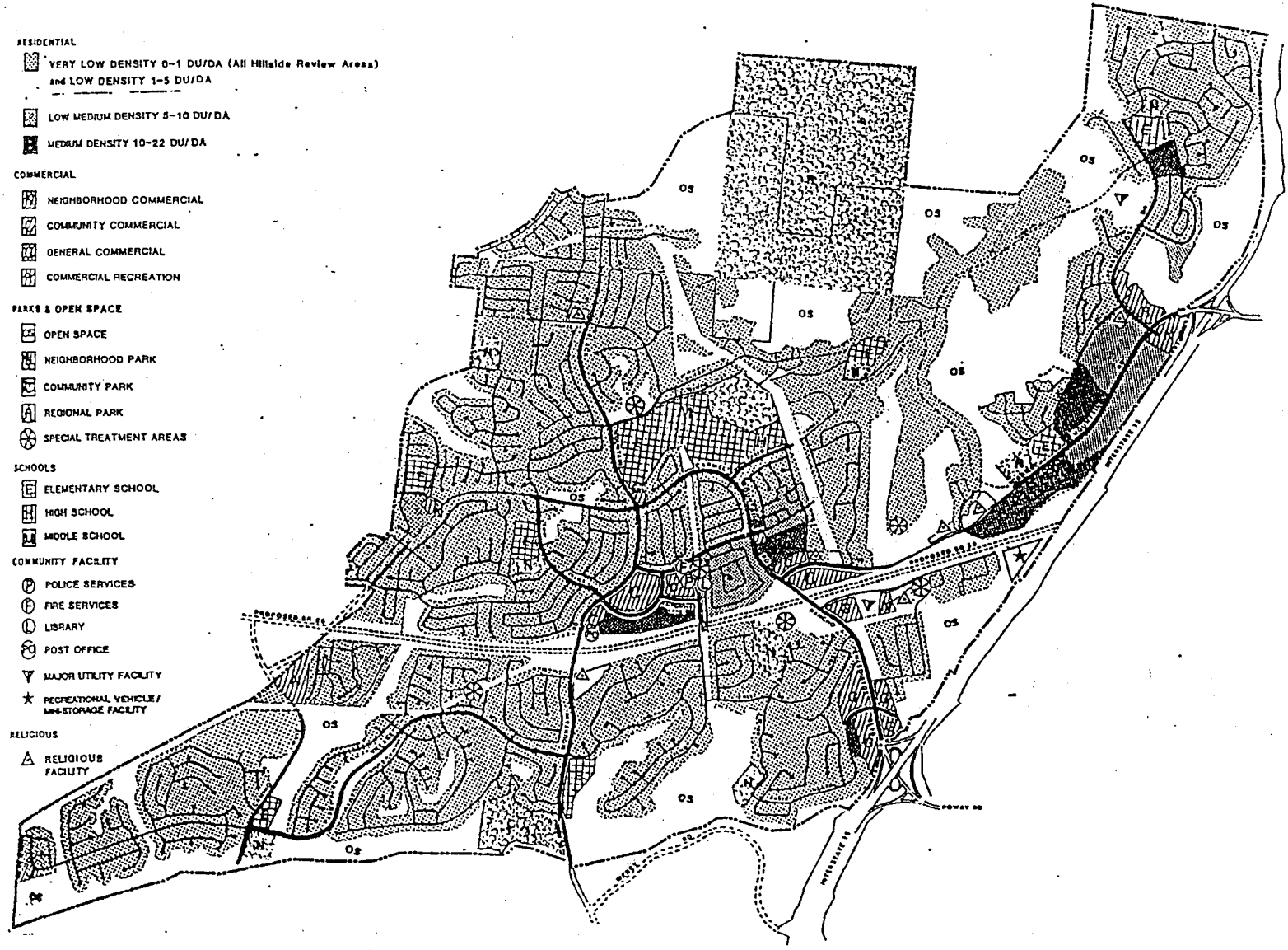
Approximately 85 percent of the community is built; about 52 percent of the area is designated for residential use. Approximately 1,000 acres are remaining to be approved for development in the community. The largest undeveloped area is 635 acres on the southern and eastern slopes of Black Mountain on which a request is currently being processed for 575 single- and multi-family residential units. The adopted plan and mid-range density ordinance would allow approximately 275 units. The proposed plan would allow approximately 575 units. Another 232 acres is being requested for single-family residential development on the eastern slope of Black Mountain. The proposed plan would allow a maximum of approximately 300 units. The adopted plan would allow approximately 200 units. There are smaller parcels in various parts of the community, designated for both neighborhood commercial and residential use, which remain to be developed.

There is additional vacant land in the community, which is designated as open space according to the proposed plan. The location of this open space is indicated in Figure 3.

Surrounding Land Uses

The Rancho Peñasquitos Community is adjacent to communities east and north that are designated as planned urbanizing, with existing or proposed uses that are similar to those in Rancho Peñasquitos (see Figure 4). Several of these communities, Carmel Mountain Ranch and Rancho Bernardo, are almost completely built out. Rancho Peñasquitos is separated from the Mira Mesa Community by Los Peñasquitos Canyon. The undeveloped area designated as Future Urbanizing is located north and west of Rancho Peñasquitos. Framework planning documents are being developed for the Future Urbanizing Area; however, certain development scenarios have already been used in regional transportation system planning.

Los Peñasquitos Canyon Preserve is located immediately to the south of the Rancho Peñasquitos Community. This preserve, which includes two large coastal canyons, Los Peñasquitos Canyon and Lopez Canyon, currently contains over 3,000 acres of publicly owned land. The primary objective of the Preserve, according to the draft master plan, is to preserve and enhance the canyons' natural and cultural resources, while permitting the public to utilize portions of the area for recreational and educational purposes. The draft plan includes recommendations for the development of trail systems throughout the Preserve and adjoining

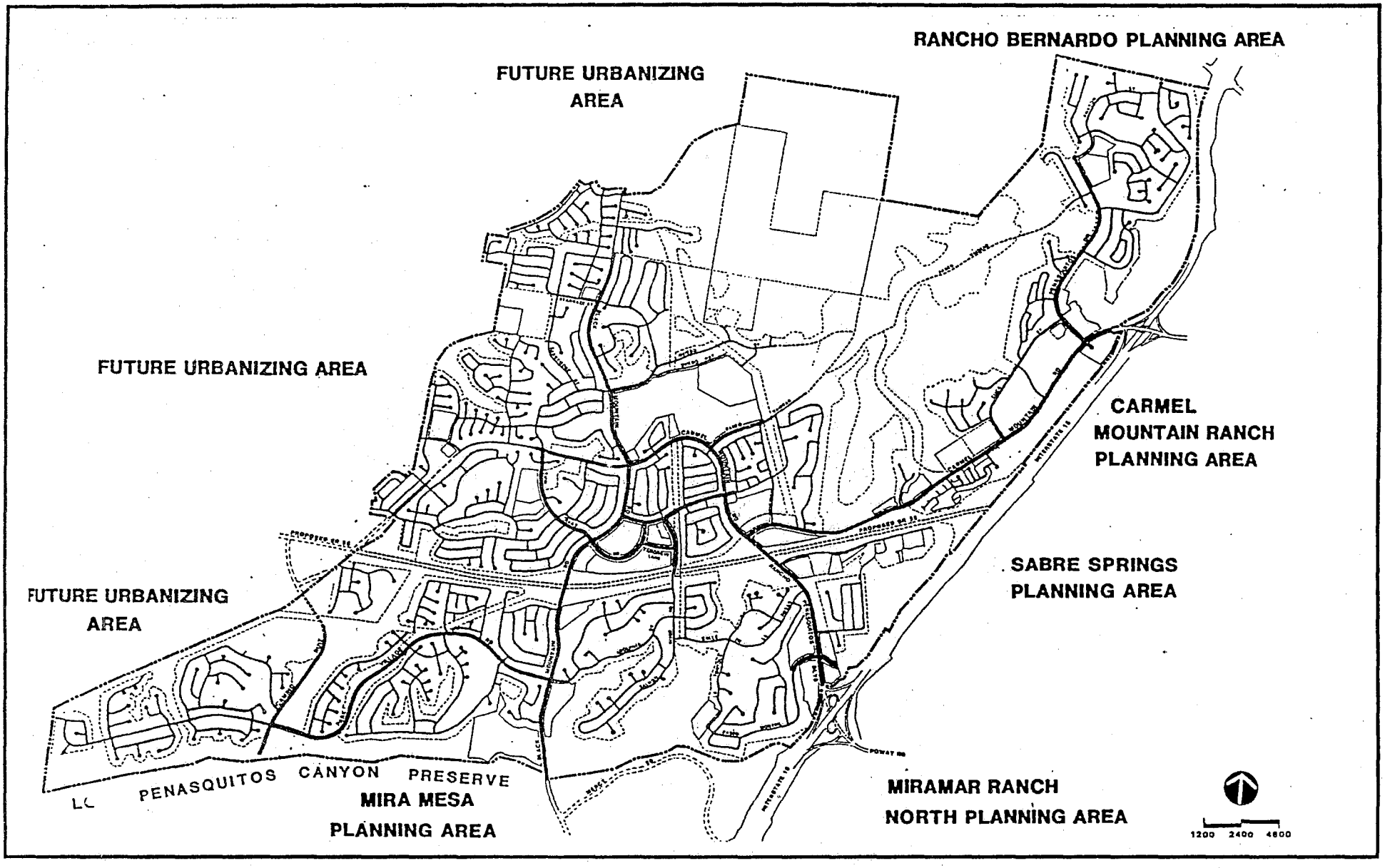


RANCHO PENASQUITOS

LAND USE PLAN

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 3



RANCHO PENASQUITOS

SURROUNDING LAND USES

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Figure 4

communities. Additional recommendations address development criteria that is intended to minimize the visibility of development in adjoining communities.

Naval Air Station (N.A.S.) Miramar is located approximately six miles south of Rancho Peñasquitos Town Center. The southwestern portion of the community is within the air station's Area of Influence (see Figure 5), as designated in the Comprehensive Land Use Plan developed by the San Diego Association of Governments (SANDAG). The air station accommodates 25,000 flight operations per year and is the home base for the Pacific Fleet Fighter and Early Warning Squadrons. The potential exists for the community to be affected by noise, fumes or hazards from the air station.

III. PROJECT DESCRIPTION

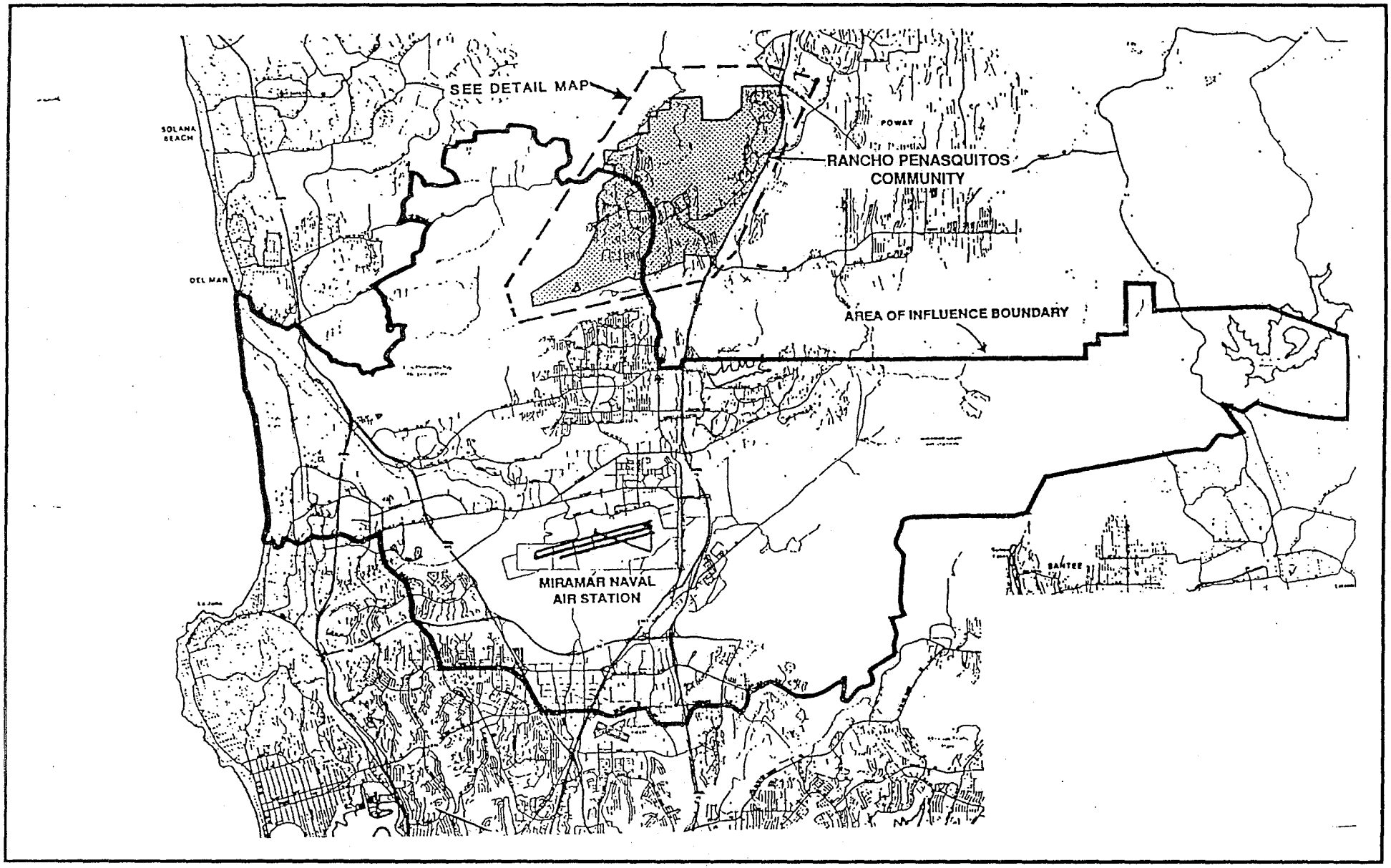
The Rancho Peñasquitos Community Plan is an update of the Peñasquitos East Community Plan which was adopted by the City Council on October 17, 1978, by Resolution No. 222051. The Peñasquitos East adopted land use plan is shown in Figure 2. The purpose of the revision is mainly to address the public facility needs of the community. Between 1985 and 1987, Rancho Peñasquitos experienced significant residential development at a rate double that of previous years. However, basic public facilities and services were not being provided at a comparable rate. Deficiencies in facilities have resulted in peak hour traffic congestion, overcrowded schools, insufficient library space, and inadequate park facilities. The Rancho Peñasquitos Community Plan was drafted to resolve deficiencies in the previous plan.

Another important aspect of the plan is the special emphasis placed on preserving the unique landforms in the area and establishing design guidelines for the sensitive development of hillside areas.

In addition, the plan includes a new element, the Industrial Use Element. This element has been added to address the community issue of lack of mini-storage space and recreational vehicle parking space. The proposed land use plan is provided in Figure 3; the revised community plan text is available under separate cover.

The following is a brief summary of the proposed modifications to the plan:

1. Transportation Element: the extension of Camino Ruiz across Los Peñasquitos Creek is eliminated; a discussion of State Route 56 is added; street classifications have been revised; a discussion of public transit issues is included. The action of eliminating the planned extension of Camino Ruiz would require an amendment to the City of San Diego Progress Guide and General Plan. Camino Ruiz is currently proposed to extend southward across Los Peñasquitos Canyon, connecting the Rancho Peñasquitos



RANCHO PENASQUITOS

NAS MIRAMAR AIRPORT INFLUENCE AREA

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Figure

5

community and Mira Mesa community via a four-lane major street. The purpose for eliminating the planned extension is to avoid significant impacts to the resources and natural character of the canyon.

2. Open Space and Conservation Element: renamed Open Space and Resource Management Element; increases emphasis on resource management goals.

3. Industrial Element: a new element which includes conversion of a site designated for open space to recreational vehicle storage/mini-warehouse use; language in the element states the site would revert to the open space designation if such uses are not implemented on the site.

4. Neighborhood Elements: the discussion of the Black Mountain neighborhood has been modified regarding permitted development in hilly terrain.

5. Community Plan Implementation Overlay Zone: this zone is proposed for City-owned property in the Town Center to ensure public facility structures comply with community plan development guidelines.

The proposed modifications would require the City Council approval of a Community Plan Amendment and an amendment of the City of San Diego Progress Guide and General Plan, and the Rezone process.

IV. ENVIRONMENTAL ANALYSIS

This section of the EIR examines the potential for significant environmental impacts associated with the implementation of the proposed community plan update. Potentially significant impacts were identified in an Environmental Initial Study and were further refined based on input received as a result of the Notice of Preparation. Since the majority of the Rancho Peñasquitos community is either developed or has received all required discretionary approvals for development, many issues which would be analyzed for a new community plan are not required to be analyzed for this update. Only those impacts which are considered to be potentially significant are addressed in this EIR.

A. TRAFFIC CIRCULATION

Existing Conditions

The Rancho Peñasquitos community is bounded on the east by Interstate 15, one of two freeways providing north-south interregional circulation in the San Diego County area. State Route 56 (SR 56) is proposed to provide an east-west link between Interstate 15 (I-15) in Rancho Peñasquitos and Interstate 5 (I-5) in Carmel Valley. The eastern portion of SR 56, located in the south central portion of the community, is partially constructed. The alignment of the mid-section of SR 56 through the Future Urbanizing Area has not been established. Until SR 56 is completed, I-15 provides the primary access between the community and downtown San Diego.

Community access to I-15 is from Rancho Peñasquitos Boulevard, Carmel Mountain Road and North City Parkway. The construction of Mercy Road between Black Mountain Road and I-15, in Mira Mesa, has relieved some of the congestion at Rancho Peñasquitos Boulevard by providing secondary access to I-15; however, there is still some peak hour congestion in the morning at the Ranch Peñasquitos Boulevard access.

The only north-south link between Mira Mesa and Rancho Peñasquitos is provided by Black Mountain Road. The Camino Ruiz crossing of Los Peñasquitos Canyon has been identified in adopted circulation elements as a necessary component in the regional transportation system since the early 1960s. This crossing was included in the City's 1962 Master Plan for Freeways and Major Streets, the 1965 General Plan, the 1969 Peñasquitos East Community Plan, and the 1977 Mira Mesa Community Plan. Camino Ruiz has been planned to provide a north-south link between Mira Mesa Boulevard and SR 56.

Camino Ruiz is planned as a four-lane major roadway in the adopted Mira Mesa and Peñasquitos East Community Plans. It is currently built in Mira Mesa between Mira Mesa Boulevard and Calle Cristobal. Another segment, about 0.5 mile long, is

constructed in Rancho Peñasquitos between Park Village Road and Dormouse Road. This segment was constructed with the Peñasquitos Park Estates residential development.

The basic roadway network in the community includes Black Mountain Road, Paseo Montalban, Twin Trails Drive, Paseo Valdear, Rancho Peñasquitos Boulevard, Peñasquitos Drive and Carmel Mountain Road. Figure 6 shows the anticipated average daily trips (ADT) on these roadways at community buildout.

Public transit service to the community includes three bus routes and two park-and-ride lots. These provide service to downtown San Diego, the I-15 corridor, and Poway. The Metropolitan Transit Development Board's Short Range Transit Plan (1991-1995) proposes increased frequency of express bus service from Rancho Peñasquitos to downtown.

Issue 1: Will the revisions to the adopted plan result in an increase in projected traffic which is substantial in relation to the capacity of the street system?

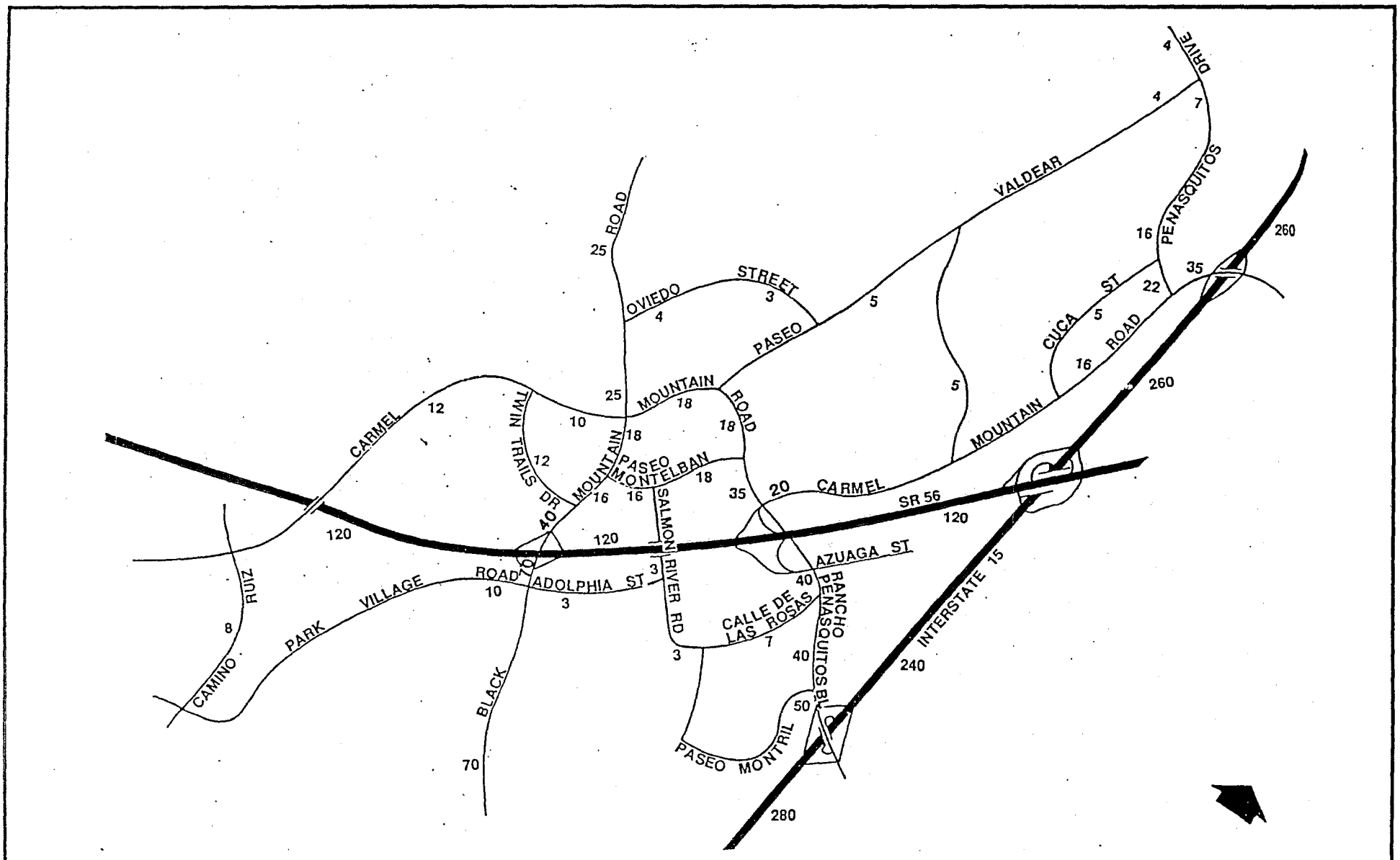
Impact

In order to assess traffic impacts associated with the proposed plan update and the elimination of Camino Ruiz crossing Los Peñasquitos Canyon, the City Engineering and Development Department (E&DD) validated the results of the 1988 computer models for the Mira Mesa and Peñasquitos East travel forecasts.

The validated trip generation rates were applied to the proposed community plan development densities. Residential development at buildout is anticipated to be 15,500 to 16,500 dwelling units (compared to 17,500 to 18,500 dwelling units anticipated according to the adopted plan). In addition to the proposed revisions to the community plan, E&DD assumed a density of 2.5 dwelling units per acre in the Future Urbanizing Area.

Infrastructure improvements had been planned for the community based on the development anticipated according to the adopted plan. However, E&DD revised the infrastructure improvement recommendations based on the density reduction of the proposed update.

Figure 6 is an illustration of the average daily trips based on build-out of the community with development according to the community plan update. Figure 7 is an illustration of the recommended street classifications; those classifications shown on Figure 7 which are not discussed in this EIR remain unchanged from the adopted community plan.



RANCHO PENASQUITOS

AVERAGE DAILY TRAFFIC (in thousands) AT BUILDOUT

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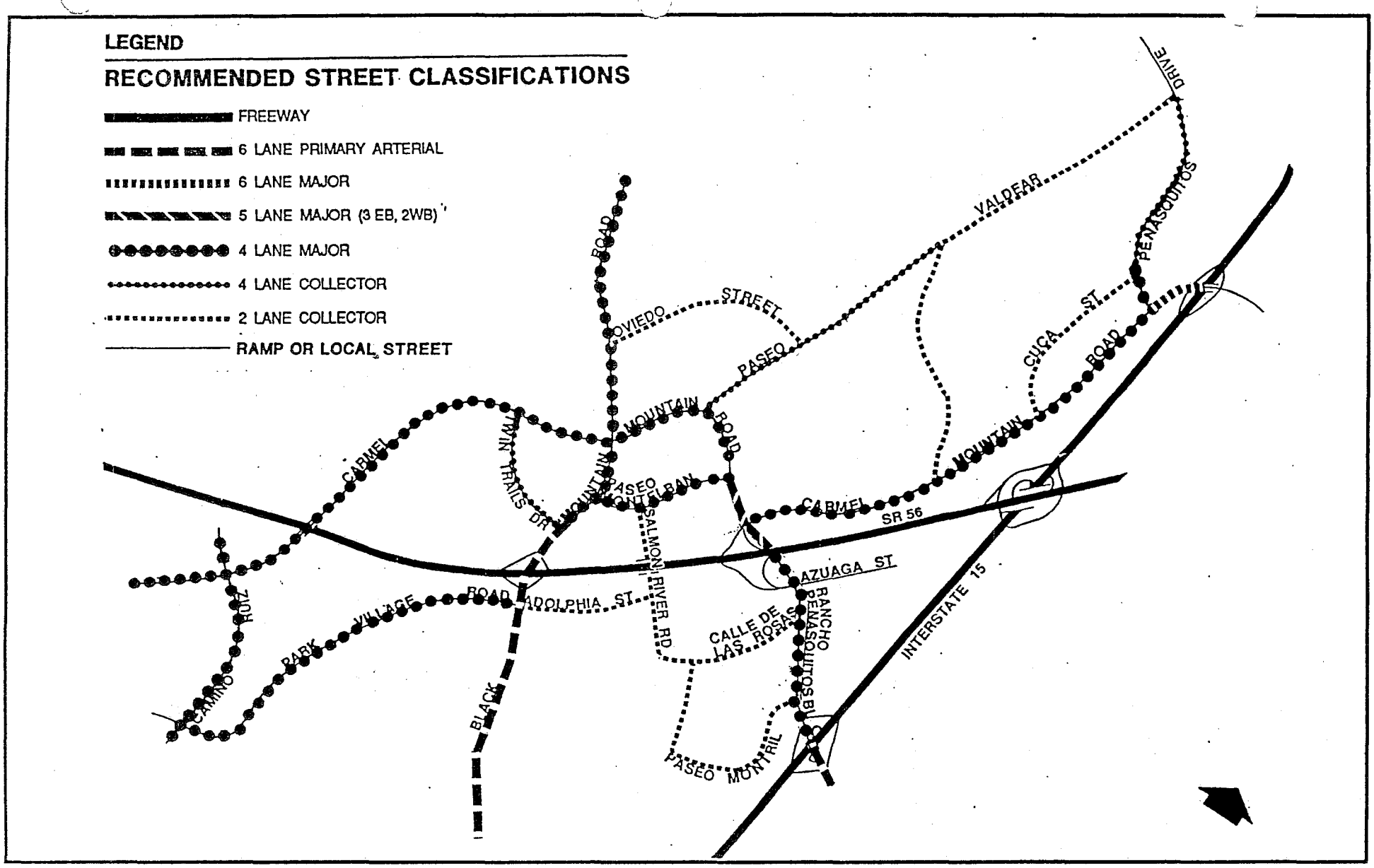
Figure 6



RANCHO PENASQUITOS

RECOMMENDED STREET CLASSIFICATIONS

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Figure
7

Results of the traffic studies conducted by E&DD show, with one exception, that levels of service at all intersections would be "C" or better at buildout if the recommended street improvements are made. The intersection at Rancho Peñasquitos Boulevard and Paseo Montril would operate at level of service "C" in the AM peak and "D" in the PM peak. The following recommendations regarding specific roadway improvements have been developed based upon the E&DD calculations.

Significance of Impact

The proposed revisions to the Rancho Peñasquitos Community Plan would not result in a significant impact on traffic or circulation in the community provided the recommended improvements are implemented.

Mitigation Measures

The following recommendations regarding specific roadway improvements have been developed based on E&DD calculations.

1. State Route 56. SR 56 should be constructed as a six-lane freeway from I-15 to the western boundary of Rancho Peñasquitos.

2. Black Mountain Road. Improve from a four-lane major to a six-lane primary arterial from just north of Twin Trails Drive to the southern community boundary.

3. Rancho Peñasquitos Boulevard. Improve to five-lane major between Carmel Mountain Road and Azuaga Street.

4. Salmon River Road. The adopted plan recommends improving the existing two-lane collector street to four-lane collector standards. However, the two-lane is sufficient to accommodate forecasted volumes. Therefore, the proposed classification is a two-lane collector.

5. Peñasquitos Drive. The adopted plan designates this road as a four-lane major from Paseo Valdear to the northern community boundary. The recommendation in the draft plan is a local street due to topography and environmental impacts.

6. Carmel Mountain Road. The adopted plan shows Carmel Mountain Road between Paseo Montalban and Rancho Penasquitos Boulevard as ultimately a six-lane major street. Change its designation to five-lane major (3EB, 2WB) and implement the fifth lane.

Issue 2: What direct and/or cumulative impacts would result if Camino Ruiz were not extended across Los Peñasquitos Canyon?

Impact

The need for an additional north-south arterial parallel to Black Mountain Road and I-15 was identified in regional transportation plans in the early 1960s and several possible alignments have been studied over the years. One of the roads with the potential to provide north-south circulation is Camino Ruiz, which is already built in Mira Mesa, and a short segment exists in Rancho Peñasquitos.

The major "roadblock" to development of a new arterial is Los Peñasquitos Canyon. The canyon has been designated as a regional preserve, providing evidence of the canyon's value to the community. There is reluctance to extend Camino Ruiz across the canyon because of potential impacts on biological and recreational resources.

In 1985, SANDAG completed the Camino Ruiz/Camino Santa Fe Traffic Study, which was conducted to determine if there remained a need for the planned Camino Ruiz - Los Peñasquitos Canyon crossing. This study concluded that "horizon year total vehicle traffic crossing a [Los] Peñasquitos Canyon screenline (I-5 to I-15) could be twice as high as today's current traffic volumes.... Additional north-south roadway capacity is needed to support the approved levels of development for the I-15 corridor communities." The study recommended that the Camino Ruiz crossing of the canyon remain in the General Plan and in the Peñasquitos East and Mira Mesa community plans.

In 1990, the City Engineering and Development Department (E&DD) conducted traffic studies for the proposed updates of the Peñasquitos East and Mira Mesa community plans. For both communities, the updates proposed eliminating the extension of Camino Ruiz across the canyon. Two street network alternatives were evaluated: what the effect would be on circulation in Rancho Peñasquitos if Camino Ruiz were not extended across the canyon; and, what the effect would be on circulation in the community if Camino Ruiz were extended across the canyon. The study evaluated the Level of Service (LOS) at 14 key intersections in Rancho Peñasquitos under both scenarios based on the proposed community plan land uses. In addition, the study showed the level of service at those 14 intersections based on the adopted community plan land use (Table 1).

If the proposed land use plan is implemented, it is anticipated that the intersection of Rancho Penasquitos Boulevard and Paseo Montril will operate at LOS "D" in the afternoon peak, for both the Camino Ruiz "in" and "out" street network alternatives. All other intersections would have LOS "C" or better, for both street network alternatives. Therefore, there would be no impact on traffic circulation in Rancho Peñasquitos if Camino Ruiz were extended across the canyon or not.

However, the results of the study showed a significant impact on levels of service at four major intersections in Mira Mesa if Camino Ruiz were not connected across the canyon. The study indicates that the four intersections would have LOS "F" if the proposed Mira Mesa Community Land Use Element is adopted and no street improvements are made to the four intersections. If the street improvements in the proposed Mira Mesa Community Plan Transportation Element are constructed and the Camino Ruiz crossing of Los Penasquitos Canyon is constructed, two of the four intersections will operate at LOS "C", and the other two will operate at LOS "D". If the Camino Ruiz crossing is not constructed, and the street improvements mentioned before are made, and if one additional northbound traffic lane is added to Black Mountain Road south of Mercy Road, two of the four intersections will operate at LOS "D" and the other two will operate at LOS "E".

According to the traffic study, if Camino Ruiz is extended across the canyon, traffic volumes on Mira Mesa Boulevard are anticipated to reach 80,000 ADT. If Camino Ruiz is not extended across the canyon, these volumes are anticipated to reach 90,000 ADT.

The potential impact to the regional transportation system as a result of not extending Camino Ruiz across Los Peñasquitos Canyon was analyzed by SANDAG as part of the Mid County Transportation Model. The analysis was conducted using two different assumptions for the North City Future Urbanizing Area: 1) ultimate development of the area at an overall density of 2.5 units per acre, with some mixture of commercial and industrial uses; and 2) ultimate buildout of the area in accordance with the existing A-1-10 zoning, which would permit an overall density of one unit per four acres, with no commercial or industrial uses.

The impact to the regional transportation system of not extending Camino Ruiz across the canyon is partially related to the intensity of development ultimately permitted within the North City Future Urbanizing Area (NCFUA). Until such time as a land use plan has been adopted for the properties within the NCFUA, it is not possible to fully evaluate the extent of the impact of not developing Camino Ruiz as a north-south arterial. However, it is known that the greater the intensity of development in the NCFUA, the greater would be the impact on I-15, I-5 and SR 56.

Significance of Impact

The proposal to not extend Camino Ruiz across Los Peñasquitos Canyon would have no effect on traffic circulation in Rancho Peñasquitos. However, there would be significant adverse direct and incremental impacts on Mira Mesa. The result would be increased traffic volumes on already overloaded roads such as Black Mountain Road, Mira Mesa Boulevard, and Mercy Road. There would be significant cumulative impacts to four major intersections in Mira Mesa.

Elimination of an additional arterial parallel to I-15, would result in greater congestion of I-15 and I-5 because those existing roads would be carrying short-distance local traffic instead of just interregional traffic for which they were designed. Under a worst case scenario (i.e. development of the NCFUA at typical urban densities), the impact of not extending Camino Ruiz across the canyon and thereby developing an additional north-south arterial, would represent a direct significant impact to the regional transportation system.

Mitigation

There are no potential impacts on Rancho Peñasquitos; therefore, no mitigation is required. In order to mitigate the traffic impacts on the Mira Mesa community associated with not extending Camino Ruiz across Los Peñasquitos Canyon, the Engineering and Development Department identified specific improvements to the lane configuration at the Black Mountain Road/Mercy Road intersection. The improvements would not reduce the cumulative impacts on intersections to below a level of significance, however, because three of the four impacted intersections would continue to operate at LOS "D" or worse. The significant direct and cumulative impacts on Mira Mesa would be avoided by the adoption of an alternative that would include the extension of Camino Ruiz across Los Peñasquitos Canyon.

The significant regional traffic impacts associated with elimination of the planned Camino Ruiz - Los Peñasquitos Canyon crossing would be mitigated to below a level of significance by retaining the option to extend Camino Ruiz across Los Peñasquitos Canyon in the future.

B. AIR QUALITY

Existing Conditions

The Rancho Peñasquitos Community is located within the San Diego Air Basin and is subject to air pollution that is primarily generated by motor vehicle emissions. The Federal Clean Air Act of 1970, as amended in 1977, mandates the attainment of national ambient air quality standards in order to protect public health from adverse effects caused by excessive concentrations of certain pollutants. In accordance with the Clean Air Act, Ambient Air Quality Standards (AAQS), the maximum background levels considered safe, have been established for six primary pollutants: carbon monoxide (CO), nitrogen oxides (NOx), ozone, sulfur dioxide, lead, and suspended particulates. Due to the unique air quality problems in California, the State Air Resources Board (ARB) has developed additional AAQS. The currently applicable state and federal standards are presented in Table 1. In the San Diego Air Basin, it is the responsibility of the Air Pollution Control District (APCD) to ensure that state and national air quality standards are achieved.

TABLE 1
STREET INTERSECTIONS LEVEL OF SERVICE

PENASQUITOS EAST: Level of Service for 14 Intersections

INTERSECTION	PROPOSED COMMUNITY PLAN LAND USE CAMINO RUIZ IN		CAMINO RUIZ OUT		ADOPTED COMMUNITY PLAN LAND USE
	AM	PM	AM	PM	
BLACK MOUNT RD. @ CARMEL MOUNTAIN RD	*C	*C	*C	*C	*C
BLACK MOUNT RD. @ PARK VILLAGE RD	*C	*C	*C	*C	*C
BLACK MOUNT RD. @ PASEO MONTALBAN	*C	*C	*C	*C	*C
BLACK MOUNT RD. @ TWIN TRAILS DR	*C	*C	*C	*C	*C
CALLE DE LAS ROSAS @ RANCHO PENASQUITOS BL	*C	*C	*C	*C	*C
CAMINO RUIZ @ CARMEL MOUNT. RD.	*C	*C	*C	*C	*C
CAMINO RUIZ @ PARK VILLAGE RD.	*C	*C	*C	*C	*C
CARMEL MOUNTAIN RD @ CUCA ST.	*C	*C	*C	*C	*C
CARMEL MOUNTAIN RD @ PASEO CARDIEL	*C	*C	*C	*C	*C
CARMEL MOUNTAIN RD @ PASEO MONTALBAN	*C	*C	*C	*C	*C
CARMEL MOUNTAIN RD @ PASEO VALDEAR	*C	*C	*C	*C	*C
CARMEL MOUNTAIN RD @ PENASQUITOS DR.	*C	*C	*C	*C	*C
CARMEL MOUNTAIN @ TWIN TRAILS DR	*C	*C	*C	*C	*C
PASEO MONTALBAN @ SALMON RIVER RD	*C	*C	*C	*C	*C

*C signfies level of service "A", "B", or "C"

Intersection	Level of Service (ICU) 6 lanes* AM	6 lanes* PM	4 lanes* AM	4 lanes* PM
Rancho Penasquitos Blvd. and Calle de las Rosas	C**	C**	C**	C**
Rancho Penasquitos Blvd. and Via del Sud	C**	C**	C**	C**
Rancho Penasquitos Blvd. and Paseo Montril	C**	C**	C**	D

* Rancho Penasquitos Boulevard
** Level of Service "C" or better

Each air basin in California has been classified by the State ARB and federal Environmental Protection Agency (EPA) for oxidants, CO, NO_2, and particulate matter as being either attainment areas (which meet standards), or nonattainment areas (which have pollutant levels which exceed the standard). The San Diego Air Basin is designated as a nonattainment area for ozone and particulate matter less than 10 microns in diameter (PM_{10}). The western portion of San Diego County (coastal plain and eastern foothills) is also a nonattainment area for carbon monoxide and nitrogen dioxide.

The ozone level is the major air quality problem in San Diego and is related to motor vehicle emissions from the local region as well as spillover from the Los Angeles Air Basin. Ozone is formed when hydrocarbons are mixed with NOx in the presence of sunlight. Heat speeds up the reaction and therefore concentrations are usually higher in the summer. In the region, the ozone levels on nonattainment days have been decreasing. NOx is of concern primarily because of its role in the ozone reaction. Motor vehicles are the primary source of both NOx and hydrocarbons in the San Diego region.

Particulate matter (PM_{10}) can aggravate respiratory diseases through penetration of the lungs. The standards for particulates were revised in 1987 to address smaller sized particulates that are a risk to human health. In 1989, no violations of the federal standard were recorded, but the more stringent state standard was violated. Problem areas for particulates in San Diego are downtown, Oceanside, and Escondido.

Carbon monoxide (CO) is a colorless, odorless gas produced primarily by incomplete burning of fuel in internal combustion engines. CO levels are directly related to vehicle speeds. Concentrations of CO occur in areas in which there are high traffic volumes and congested conditions. Concentrations are especially high at those locations in which vehicles idle for prolonged periods, such as congested intersections. These areas of high CO build-up are generally referred to as "CO hotspots". Since these "hotspots" typically occur at locations in which traffic is congested, CO concentrations would be expected at intersections with a level of service "D" or worse.

The concentration of pollutants within the San Diego Air Basin are measured at eight stations maintained by both the APCD and the ARB. The air quality monitoring station nearest to the Rancho Peñasquitos community is the Kearny Mesa monitoring station. In the absence of site-specific air quality data for the community, data from this station are assumed to be representative. The ozone and carbon monoxide data compiled for the Kearny Mesa station is presented in Table 2 and 3, respectively, which summarize the number of days and hours, from 1985 through 1989, in which standards were exceeded at this station.

State standards are more stringent than federal standards for all pollutants except NO_2, for which federal and state standards are not comparable. The only national standard that was exceeded within the last five years was the ozone standard. San Diego is not expected to reach attainment for ozone because of the influence of the Los Angeles basin. Total suspended particulates have also exceeded state standards at the Kearny Mesa station.

TABLE 2
AMBIENT AIR QUALITY STANDARDS

		California Standards		National Standards		
Pollutant	Averaging Time	Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm	-	0.12 ppm (235 µg/m3)	Same as Primary	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour 1 Hour	9.0 ppm (10 mg/m3) 20 ppm (23 mg/m3)	Non-dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m3) 35 ppm (40 mg/m3)	-	Non-dispersive Infrared Spectrascopy (NDIR)
Nitrogen Dioxide	Annual Average 1 Hour	- 0.25 ppm (470 µg/m3)	Gas Phase Chemilumi-nescence	100 µg/m3 (0.05 ppm) -	Same as Primary Standards	Gas Phase Chemilumi-nescence
Sulfur Dioxide	Annual Average 24 Hour 3 Hour 1 Hour	- 0.05 ppm (131 µg/m3) - 0.25 ppm (655 µg/m3)	Ultraviolet Fluorescence	80 µg/m3 (0.03 ppm) 365 µg/m3 (0.14 ppm) - -	- - 1300 µg/m3 (0.5 ppm) -	Pararosaniline
Suspended Particulate Matter (PM 10)	Annual Mean 24 Hour	30 µg/m3 50 µg/m3	Size Selective Inlet High Volume Sampler	50 µg/m3 150 µg/m3	-	High Volume Sampling
Sulfates	24 Hour	25 µg/m3	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average Calendar Quarter	1.5 µg/m3 -	Atomic Absorption	- 1.5 µg/m3	- Same as Primary	Atomic Absorption
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m3)	Cadmium Hydroxide Stractan	-	-	-
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 µg/m3)	Tedlar Bag Collection, Gas Chromatography	-	-	-
Visibility Reducing Particles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70%.		-	-	-

Notes:

1. California standards, other than ozone, carbon monoxide, sulfur dioxide (1 hour), nitrogen dioxide, and particulate matter (PM_{10}), are values that are not to be equaled or exceeded. The ozone, carbon monoxide, sulfur dioxide (1 hour), nitrogen dioxide, and particulate matter (PM_{10}) standards are not to be exceeded.
2. National standards, other than ozone and those based on annual averages or annual geometric means, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above standard is equal to or less than one.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury. All measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of mercury (1,013.2 millibar). Ppm in this table refers to ppm by volume or micromoles of pollutant per mole of gas.
4. Any equivalent procedure that 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. Each state must attain the primary standards within a specified number of years after that state's implementation plan is approved by the Environmental Protection Agency (EPA).
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. Each state must attain the secondary standards within a "reasonable time" after the implementation plan is approved by the EPA.
7. Reference method as described by the EPA: An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.
8. Prevailing visibility is defined as the greatest visibility that is attained or surpassed around at least half of the horizon circle but not necessarily in continuous sector.
9. The annual PM_{10} state standard is based on the geometric mean of all reported values taken during the year. The annual PM_{10} national standard is based on averaging the quarterly arithmetic means.

TABLE 3
OZONE
NUMBER OF DAYS EXCEEDING FEDERAL AND STATE STANDARDS
SAN DIEGO COUNTY

1985-1989

STATION	NUMBER OF DAYS EXCEEDING FEDERAL ONE HOUR STANDARD CONCENTRATION > 12 pphm					NUMBER OF DAYS EXCEEDING STATE ONE HOUR STANDARD CONCENTRATION >9 pphm					MAXIMUM ONE HOUR CONCENTRATION (pphm)					DATE OF MAXIMUM CONCENTRATION				
	89	88	87	86	85	89	88	87	86	85	89	88	87	86	85	89	88	87	86	85
El Cajon	5	8	2	3	9	38	43	24	55	54	21	19	14	14	18	3/31	8/25	10/1	4/21	8/30
Chula Vista	7	4	2	2	4	21	17	15	20	28	16	22	16	14	20	9/14	9/3	11/8	8/19	10/5
Escondido	9	7	6	2	12	40	39	27	12	43	19	18	17	13	17	3/31	10/9	9/30	5/18	7/8
Alpine	38	34	25	27	33	137	137	105	92	128	20	19	17	16	22	3/31	8/25	9/2	9/4	8/29
Downtown S D	9	2	1	2	5	22	9	8	12	23	18	18	14	16	16	9/14	9/3	11/8	8/19	7/2
Oceanside	8	7	7	10	15	21	22	19	31	36	19	25	18	19	18	9/14	3/26	10/3	3/27	4/13
Kearny Mesa	9	7	5	7	14	31	24	22	27	48	23	22	17	15	22	3/31	9/3	9/1	5/17	4/13
Del Mar	16	9	11	13	12	36	30	27	43	48	25	18	29	19	18	9/14	3/26	10/3	4/20	6/6
Basinwide	55	45	40	46	50	158	160	128	131	148	25	25	29	19	22	9/14	3/26	10/3	3/27	4/13

TABLE 4
CARBON MONOXIDE
NUMBER OF DAYS EXCEEDING FEDERAL AND STATE STANDARDS
SAN DIEGO COUNTY

1985-1989

STATION	NUMBER OF DAYS EXCEEDING FEDERAL 8 HOUR AVG STANDARD CONCENTRATION > 9 ppm					NUMBER OF DAYS EXCEEDING STATE 8 HOUR AVG STANDARD CONCENTRATION > 9.0 ppm					MAXIMUM EIGHT HOUR AVG CONCENTRATION (ppm)					DATE OF MAXIMUM EIGHT HOUR AVG CONCENTRATION				
	89	88	87	86	85	89	88	87	86	85	89	88	87	86	85	89	88	87	86	85
El Cajon	0	0	0	0	0	0	0	0	0	0	6.3	6.3	6.6	7.4	7.0	1/10	1/4	12/11	12/4	12/24
Chula Vista	0	0	0	0	0	0	0	0	0	0	4.4	3.6	3.4	5.1	3.9	1/20	12/5	2/5	12/4	12/3
Escondido	4	0	0	0	1	5	1	1	1	1	10.0	9.3	9.3	9.4	9.8	12/22	12/1	12/10	1/11	12/18
Downtown S.D.	0	0	0	0	0	0	1	0	0	1	9.0	9.3	9.4	9.0	9.4	11/15	11/29	12/10	1/11	11/1
Oceanside	0	0	0	0	0	0	0	0	0	0	4.1	4.5	4.3	4.4	4.4	1/18	2/9	12/3	1/11	12/24
Kearny Mesa	0	0	0	0	0	0	0	0	0	0	4.8	3.4	4.0	4.8	3.3	11/15	11/29	12/11	12/4	12/21
Carlsbad	2	2	0	1	2	2	2	1	1	2	10.5	9.8	9.3	10.4	13.0	1/20	11/29	12/10	1/10	12/20

The Clean Air Act amendments of 1977 mandate that all air basins meet federal standards by 1989. The California Clean Air Act (CCAA) of 1988 requires that air districts develop plans to achieve the state ambient air quality standards as expeditiously as possible.

In 1991, the San Diego District submitted a Draft San Diego County Regional Air Quality Strategy (RAQS) to the state Air Resources Board. If approved, the proposed RAQS will include regulations that require control technologies for reducing emissions from existing sources. The revised strategy was required to address controls for smog, CO, and NO_2 as soon as possible. Specific requirements for actions to address state particulate standards have not yet been adopted by the legislature.

The 1991 RAQS contains control measures designed to improve air quality by concurrently reducing reactive organic gases (ROG), NO_x, and CO emissions from stationary sources and mobile sources (transportation related). Control measures include emissions limits, procedural rules, and compliance measures.

The following are the type of control measures listed in the 1991 Draft San Diego County RAQS that are relevant to the Rancho Peñasquitos Community Plan Update.

1. Trip reduction and parking management programs to reduce vehicle trips and increase average vehicle occupancies.

2. Expansion of transportation alternatives including park-and-ride facilities, high-occupancy-vehicle facilities and expanded public transit.

3. Traffic systems management to encourage better traffic flow by ramp metering and transportation control improvements.

Issue: To what extent would implementation of the proposed community plan affect the ability of the region to meet federal clean air standards?

Impact

As of 1991, the Rancho Peñasquitos community was approximately 85 percent built-out. The January 1990 census showed a population of 41,000. When development in the community is complete, the population is anticipated to be 49,000 to 53,000.

Implementation of the land use plan included within the proposed update would not directly adversely impact the ability of the region to attain federal air quality standards, because the proposal is to reduce permitted development from the adopted plan. The anticipated levels of service at all intersections in the community is "C" or better. However, any additional development results in additional emissions which incrementally affects regional air quality standards. The proposal, however, to eliminate the development of an additional

north-south arterial by connecting Camino Ruiz across Los Peñasquitos Canyon would adversely affect the region's ability to meet clean air standards due to the increased traffic congestion that would occur in Mira Mesa.

As discussed in the Traffic Section, not extending Camino Ruiz across the canyon would result in street intersections that would operate at LOS "D" or worse. This congestion would result in increased carbon monoxide and smog-forming hydrocarbon emissions, thereby having an incremental impact on air quality. In addition, this proposal would degrade the LOS at the Black Mountain Road/Mercy Road interchange from "C" to "D" with intersection improvements, and from "C" to "F" without improvements.

The Black Mountain Road/Mira Mesa Boulevard intersection is currently considered a CO "hotspot". If Camino Ruiz is not extended across the canyon, this intersection would continue to operate inefficiently, even with intersection improvements. Under the same scenario, the Black Mountain Road/Mercy Road interchange would become a CO "hotspot" at full build-out of the Mira Mesa community.

Significance of Impact

Implementation of the draft Rancho Peñasquitos Community Plan would result in direct and cumulative impacts to air quality. The impacts are associated with congestion that would result on Mira Mesa roadways if Camino Ruiz is not connected to provide an additional north-south arterial.

In addition, development in Rancho Peñasquitos according to the proposed plan would significantly impact air quality in the region by adding incrementally to automobile emissions.

Mitigation

The draft Mira Mesa Community Plan contains goals, proposals, and implementation measures intended to implement the transportation tactics outlined in the 1991 RAQS. These measures include:

a. A goal to provide a transportation system that maximizes the opportunities for transit use.

b. A goal to provide a system of bikeways and pedestrian facilities that will encourage bicycling and walking as a means of transportation.

c. Policies for new development that require accommodations for transit use.

d. Policies to provide bicycle parking and storage at all commercial sites.

e. Recommendations for specific traffic improvements.

f. A requirement to design the future Carroll Canyon development area in a manner that would support mass transit.

Implementation of the various measures outlined in the Mira Mesa draft update would help to implement the RAQS, but would not reduce the direct or cumulative impacts to a level of insignificance. A reduced development intensity alternative would reduce the proposal's contribution to cumulative air quality impacts, but not to a level of insignificance. Only through implementation of an alternative that retains the connection of Camino Ruiz between Mira Mesa and Rancho Peñasquitos would these impacts be avoided.

The San Diego Association of Governments (SANDAG) forecasts growth for the region based in part on development anticipated according to community plans. The APCD uses the growth forecasts to project emissions and subsequently develop measures to reduce emissions and improve air quality. Allowable densities in the adopted community plan were incorporated into the SANDAG Series VII growth forecast. The most recent RAQS were developed according to the Series VII forecast. The density reduction in the proposed plan, as compared to the adopted plan, would reduce the emissions projected by the Series VII forecast. Therefore, implementation of the proposed plan would mitigate the impact on regional air quality compared to implementation of the adopted plan, but not to below a level of significance. Therefore, development according to the proposed plan would still contribute incrementally to degradation of air quality.

C. LAND USE

Existing Conditions

1. Industrial Element

The adopted community plan does not contain an Industrial Land Use Element. There are no recreational vehicle (R.V.) storage lots or mini-storage warehouse facilities in the community. The draft plan identifies the need for such facilities and states that many residents park their R.V.s illegally on residential streets because neighborhood regulations prohibit R.V. parking on streets.

The draft plan includes an industrial element in order to address this issue. The primary goal is to provide an attractive and compatible R.V./mini-storage facility that will provide adequate space for R.V.s belonging to the residents of the community. A site southwest of the SR 56/ I-15 intersection is designated for this use (see Figure 8). The site is accessible through an adjacent multi-family development, and it is disturbed due to previous use as a construction materials storage yard. The site is currently designated as open space.

In July, 1989, the Planning Department completed a study of all potential R.V./mini-storage sites in Rancho Peñasquitos. The conclusions of the study were that most sites are not suitable for such uses because of economic and locational factors. The most suitable site identified in the study is the 10.2-acre site which is shown on Figure 8. However, there is industrially-zoned land in the adjacent community of Sabre Springs, where a mini-warehouse/ RV storage yard would be permitted.

The draft plan recommends that conversion from open space to industrial use should not occur until an R.V./mini-storage project is approved by the City. Further, if development of an R.V. storage and mini-warehouse facility is determined to be infeasible at the proposed location, the land use designation should remain open space and the existing open space easement should remain on the property. In addition, the plan recommends that development of the site should be restricted to R.V. storage and mini-warehouses; other uses should be prohibited.

2. Adopted Policies and Environmental Plans

The City of San Diego City Council Policy 600-40 requires analysis of development suitability and analysis of consistency with the Resource Protection Ordinance for all community plans to ensure that environmental resources and other site constraints are fully considered in preparation of the plan. This analysis is conducted to evaluate whether development proposals consistent with the proposed community plan would be consistent with the Resource Protection Ordinance.

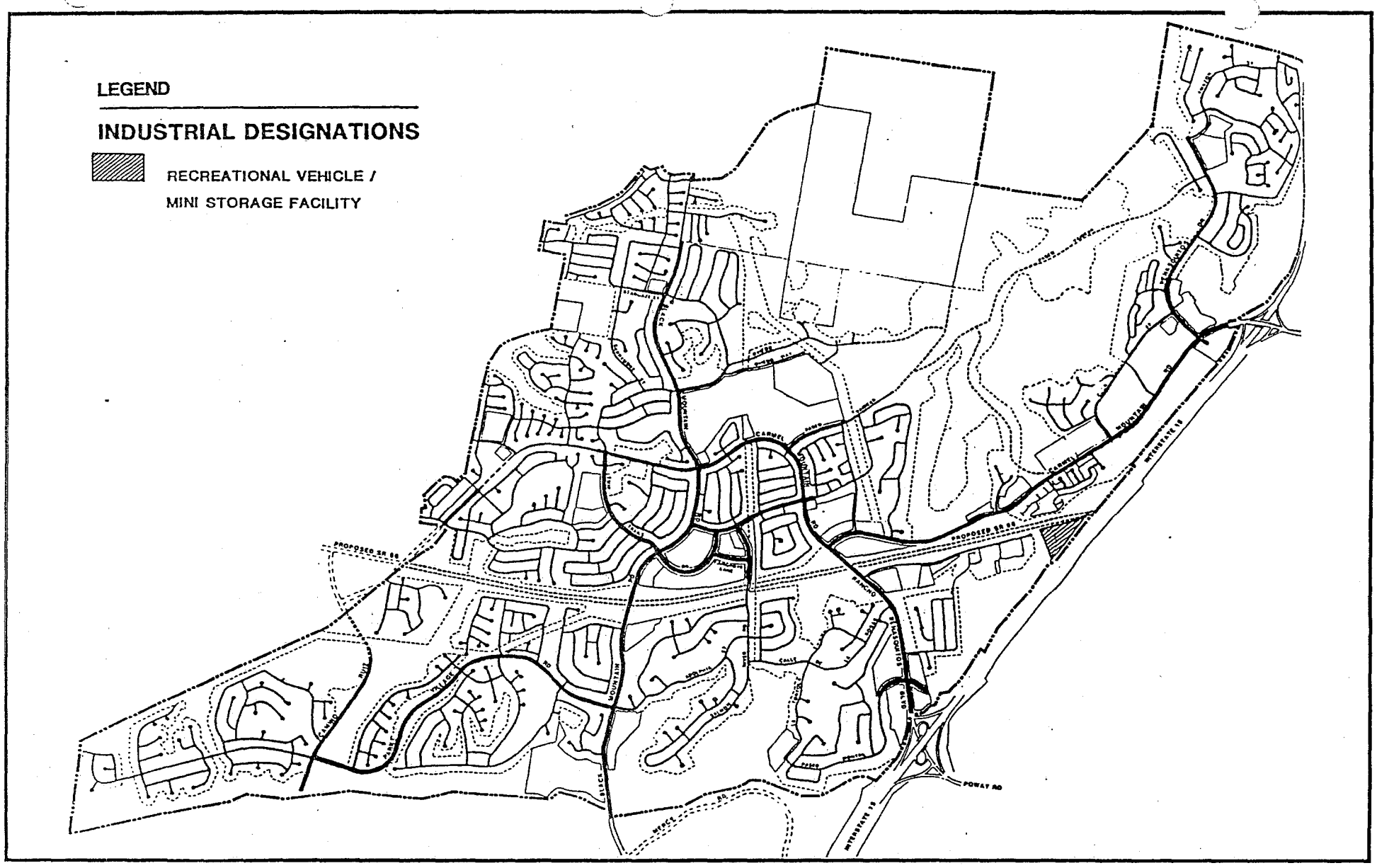
Issue 1:

Would the proposed conversion of open space to industrial use result in a conflict with the environmental goals, objectives, and recommendations of the Rancho Peñasquitos community?

Impact

Of the 6,500-acre community, approximately 1,482 acres (23 percent) is open space and 3,356 acres (51.7 percent) is developed for residential use. The potential loss of 10 acres of open space would not have a significant direct impact on land use in the community. In addition, the site is not highly valuable biological habitat, and is disturbed. Therefore, there would not be a direct significant impact on biological resources.

The potential conversion of open space to industrial use would have an indirect impact on passive recreational use because part of the value of small open spaces within a developed area is to provide breaks in the formal urbanized structure. In addition, there would be an impact, though not considered significant, on biological resources because any undeveloped area, regardless of size, provides habitat for some species of wildlife.



RANCHO PENASQUITOS
INDUSTRIAL AREAS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure
8

The potential land use change could have a significant visual impact because the site is visible from Interstate 15 (northbound and southbound), from Carmel Mountain Road, and from SR 56.

Significance of Impact

Losses of open space associated with conversion to industrial use could have a significant impact on visual quality. There would not be a significant impact on land use or biological resources.

Mitigation

Mitigation of the potentially significant impact on visual quality could involve location of a RV parking/storage facility in the Sabre Springs industrial area. This locale is proximate to the Rancho Peñasquitos community. Adoption of this alternative would avoid potential impacts on visual quality due to conversion of open space to industrial use. Refer to Section E. Visual Quality

Issue 2:

Will implementation of the proposed plan result in a conflict with adopted environmental plans for the area?

Impact

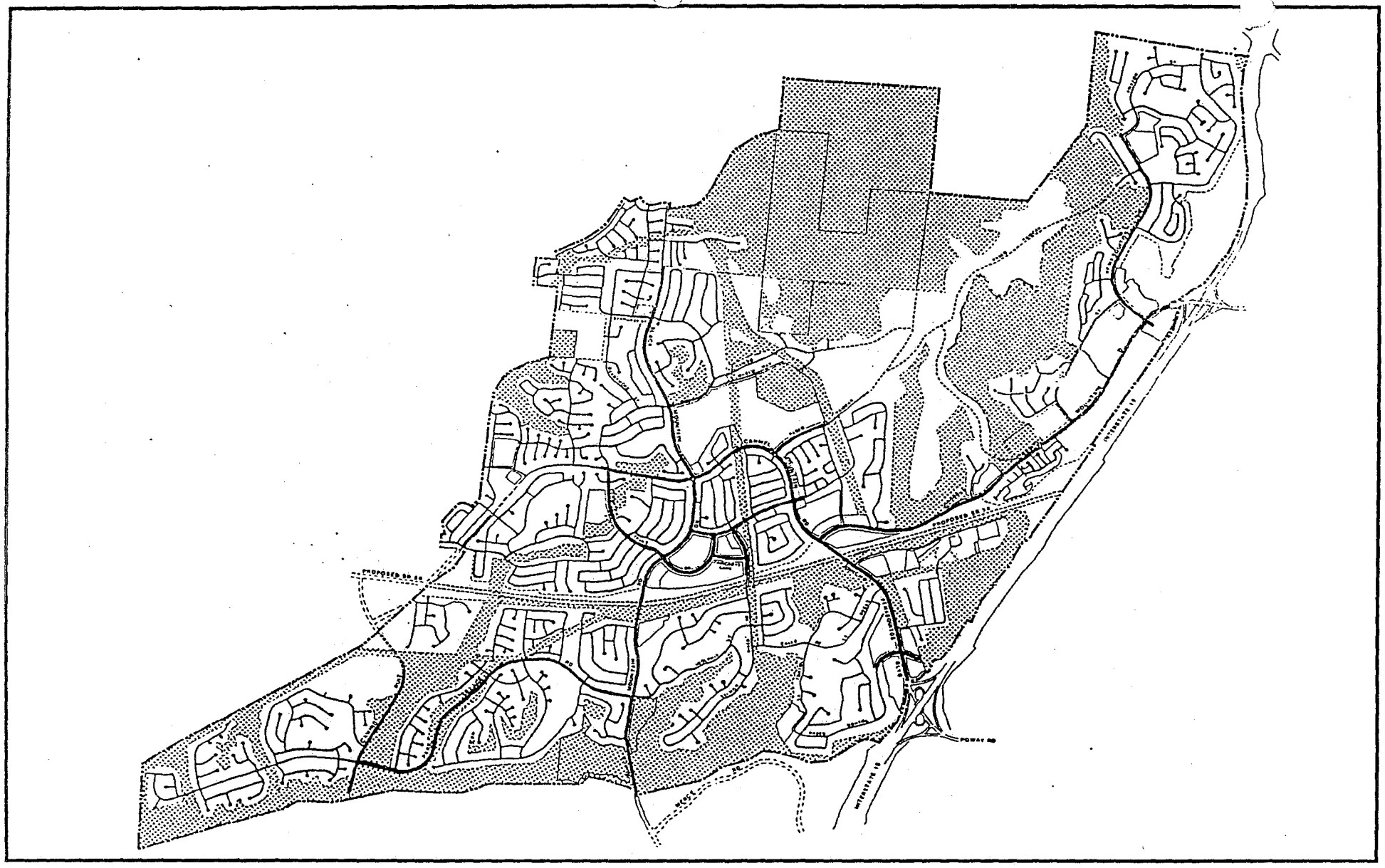
The analysis for development suitability and consistency with the Resource Protection Ordinance, as required by City Council Policy 600-40, was not conducted for the draft plan. Therefore, there is a potential impact on land use which would occur if future development proposals were consistent with the community plan but not consistent with adopted resource protection regulations.

Significance of Impact

There would potentially be a significant impact on land use if the future development plans are consistent with the Rancho Peñasquitos Community Plan, but inconsistent with adopted resource protection policies and ordinances.

Mitigation

The potentially significant impact on land use could be mitigated or avoided by conducting the analyses for development suitability and consistency with the Resource Protection Ordinance for the remaining undeveloped parcels in the community, and revising the Community Plan if required.



RANCHO PENASQUITOS

OPEN SPACE SYSTEMS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 9

D. BIOLOGICAL RESOURCES

Existing Conditions

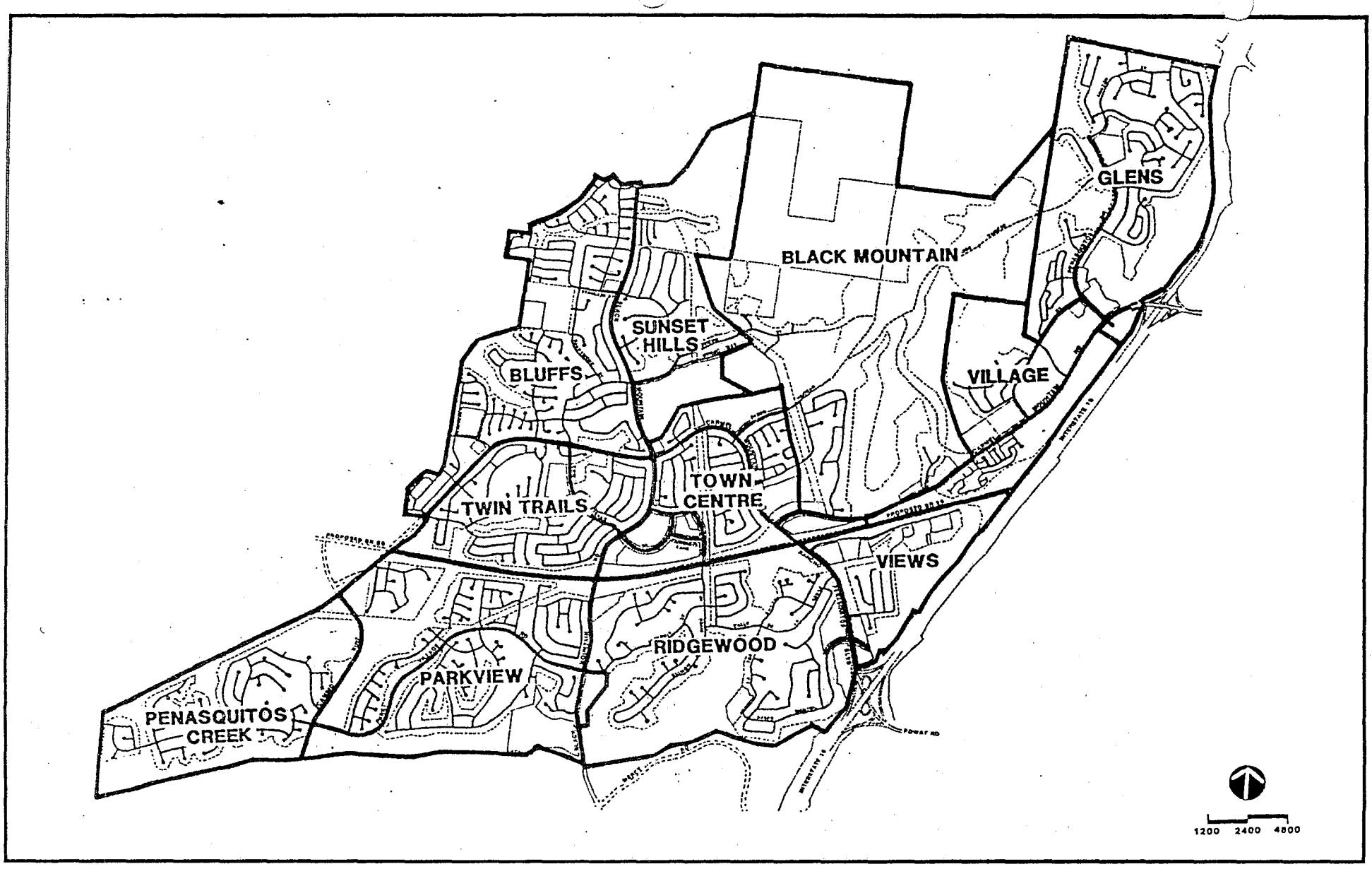
Because the community is 85 percent built, biological resources have been depleted substantially. For the most part, designated open spaces are isolated steep slopes of limited acreage. Roads and development prohibit connections between open spaces in the northern (north of SR 56) and southern (south of SR 56) portions of the community (see Figure 9). The following discussion refers to certain neighborhoods in the community. Figure 10 is an illustration of the neighborhood configuration.

The northern portion of the community is identified easily by the prominent peak, Black Mountain. While the peak itself is a multi-user telecommunications station, evidenced by the many antennae and several small structures, the slopes of the mountain are undisturbed native vegetation which provides habitat for diverse wildlife. The peak is at the southern boundary of 240-acre Black Mountain Park, purchased from the federal Bureau of Land Management. The draft community plan recommends acquisition of an additional 240 acres for the park. This undeveloped park is significant because of its acreage, undisturbed condition, and potential connections to open space in the Future Urbanizing Area.

The southern portion of the community is bounded on the south by Los Peñasquitos Canyon, a prominent landmark. Most of the canyon is within Los Peñasquitos Canyon Preserve. The preserve is approximately 3,400 acres and stretches from Interstate 5 to Interstate 15 including the bottomlands along Los Peñasquitos Creek and a large portion of the canyon sideslopes. The preserve provides important recreational opportunities, but also protects diverse animal and plant populations. Los Peñasquitos Canyon and Lopez Canyon converge at the toe of Lopez Ridge, near Sorrento Valley. The construction of Calle Cristobal in this area included the construction of a bridge to maintain the topographic connection between Lopez and Los Peñasquitos Canyons.

In the southern part of the community, roads separate community open space and the preserve. However, currently those roads do not carry large volumes of traffic (with the exception of Black Mountain Road) and thus a viable connection with the preserve still exists. Because of its diversity, large acreage, ranger protection, and mostly undeveloped condition, open space connections to the preserve are significant.

There are two areas of significant acreage remaining to be approved for development within the Black Mountain neighborhood, which total about 900 acres. These areas are adjacent to Black Mountain Park and to the southern slopes of Black Mountain proposed for acquisition and addition to the Park (see Figure 11).



RANCHO PENASQUITOS

NEIGHBORHOOD CONFIGURATIONS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 10

Vegetation in these areas is mostly coastal sage scrub and chaparral. The coastal sage scrub is a widespread vegetation type generally found on slopes with a southern exposure and at lower elevations than chaparral. It is characterized by low-growing plants and has a relatively open canopy. Dominant species include California sagebrush (Artemisia californica) and flat-top buckwheat (Eriogonum fasciculatum).

Chaparral is characterized by taller vegetation with a denser canopy than the scrub. It occurs on mesas, and on slopes; it is most successful on sheltered slopes along drainages. The nature and diversity of the community depends on the degree and aspect of slope, and on soils. Dominant species of the chaparral in this area include: chamise (Adenostoma fasciculatum), black sage (Salvia mellifera), and mission manzanita (Xylococcus bicolor). Additional species include lemonadeberry (Rhus integrifolia) and laurel sumac (Rhus laurina).

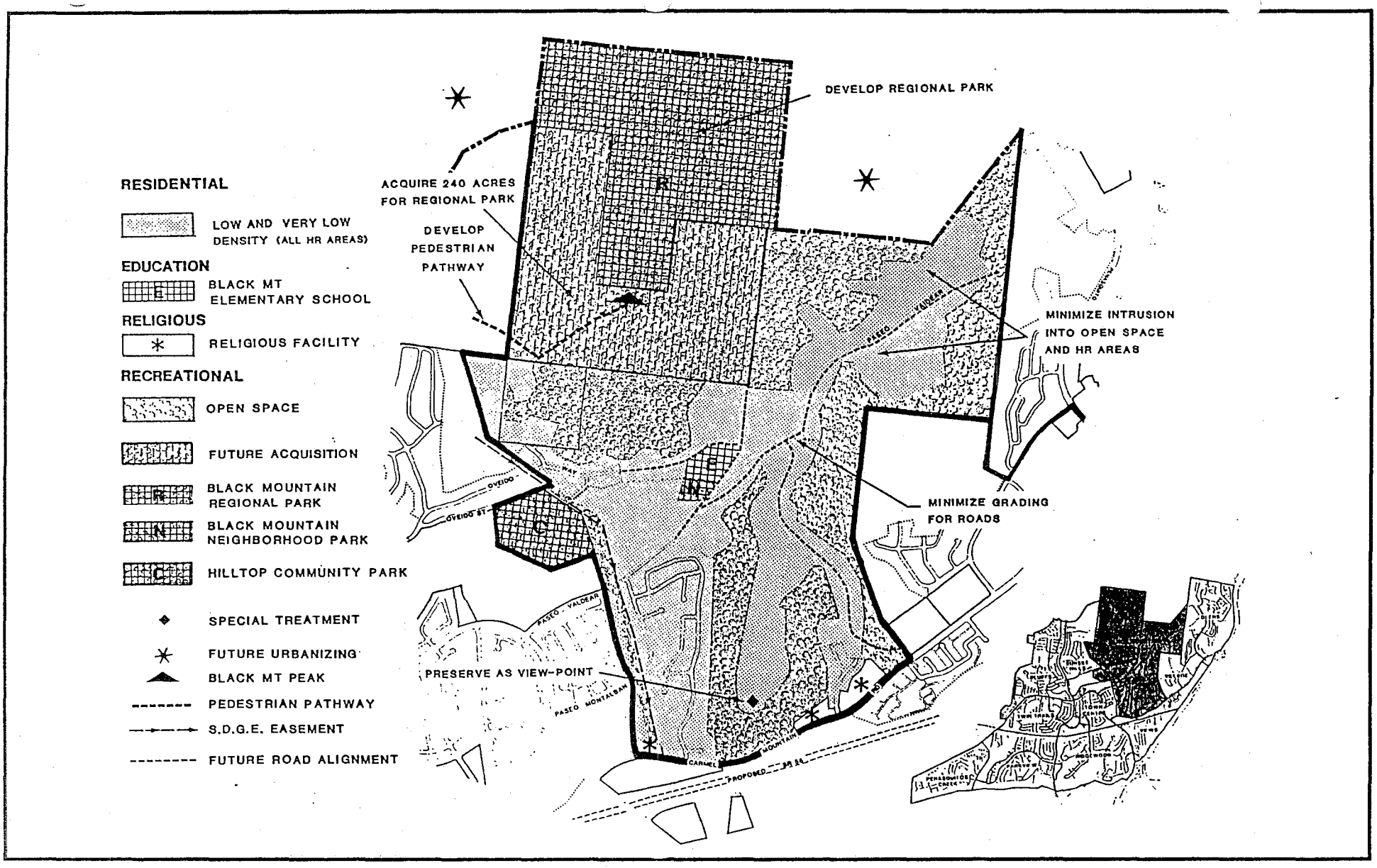
In the southern portion of the community, there is one area of significant acreage remaining to be developed in the Peñasquitos Creek and Parkview neighborhoods (see Figures 12 and 13). The area totals about 80 acres, and is located on a mesa north of Los Peñasquitos Creek and on the side slopes of a tributary to the creek.

Vegetation in this area is mostly chaparral. There are some areas of coastal sage scrub on south and east facing slopes in the eastern portion of the property. Another vegetation type present in this area is vernal pools. The pools are a subassociation of the chaparral on the mesa.

The pools are associated with gilgai microrelief, characterized by mounds and intermound depressions. A specialized floral and faunal community develops when spring rains collect in the shallow depressions due to impervious soils. Many of the region's vernal pools have been lost because they were located on mesas, the most suitable land for development. Therefore, the remaining pools are highly valuable resources and many of the plants associated with vernal pools are candidates for the endangered species list according to the federal Endangered Species Act.

The community plan designates this area for low density residential use and Neighborhood Commercial use. In addition, the plan shows Camino Ruiz to be constructed in this area.

The coastal sage scrub vegetation provides key habitat for the California gnatcatcher (Polioptila californica). Due to significant impacts on its habitat, both through direct losses and through habitat fragmentation, the species is currently in process for federal endangered status. Therefore, any loss or isolation of this habitat would be considered a significant impact. Gnatcatchers have also been observed on the undisturbed slopes below the graded portion of Hilltop Community Park.



RANCHO PENASQUITOS

BLACK MOUNTAIN NEIGHBORHOOD

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 11

While not technically a resource, wildlife movement corridors are an important element of viable habitat. When these corridors are severed by development or roads, habitats are fragmented. This isolation affects some species more than others, but can result in population declines due to predator-prey imbalances, reduction of juvenile dispersal territories, or inadequate gene pool diversity. Therefore, it is important to identify the location of active corridors and to maintain suitable connections between open space. These connections and corridors should be kept free of disturbances from light and noise.

One active corridor has been identified in the southern portion of the community. It connects Los Peñasquitos Canyon and Deer Canyon, located in the Future Urbanizing Area; the corridor is located essentially along the alignment of Camino Ruiz north of Park Village Road. Because traffic volumes are currently low on Park Village Road, crossing mortality has not been documented as high. Wildlife moves from the preserve, up the "Camino Ruiz canyon," along the slopes, and up to the mesa and northwest to Deer Canyon. Apparently this corridor is used as a route between the largely undeveloped Future Urbanizing Area and Los Peñasquitos Canyon. Animal tracks that have been documented include deer, coyote, and bobcat.

Issue 1: Will implementation of the proposed plan result in a reduction in the number of any unique, rare, endangered, or sensitive species of plants or animals, through impacts on habitat, such as direct losses or fragmentation?

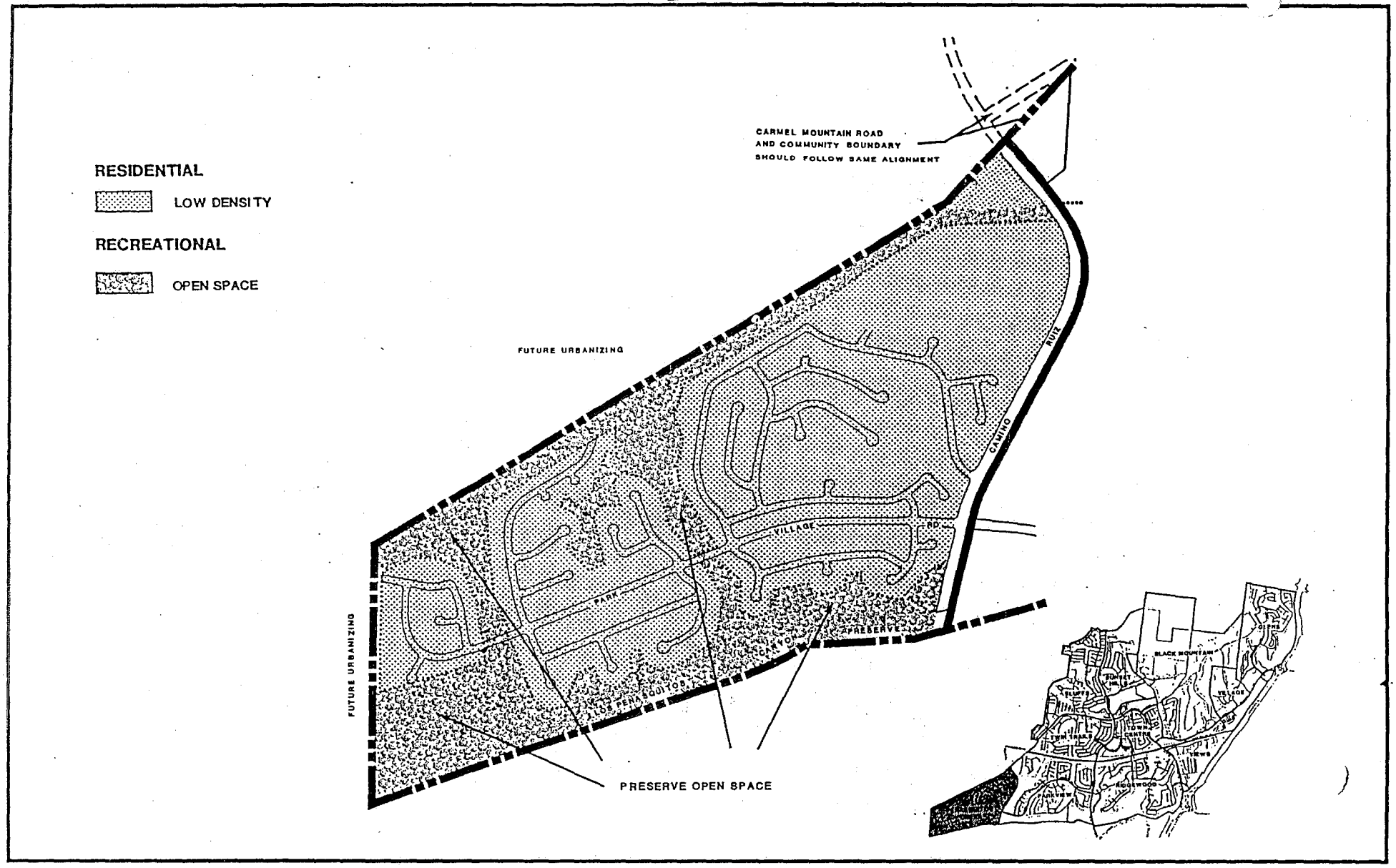
Issue 2: Would implementation of the proposed plan result in interference with the movement of any resident or migratory fish or wildlife species?

Issue 3: Would implementation of the proposed plan result in introduction of invasive plant species?

Impacts

Implementation of the plan would result in very low density residential development, the construction of an elementary school and park, and the extension of Oviedo Street in the Black Mountain neighborhood. These facilities would isolate the coastal sage scrub habitat below the Hilltop Community Park which currently connects with the undisturbed slopes of Black Mountain. This habitat is known to be used by California gnatcatchers. In addition, these developments would result in the direct loss of a significant acreage of coastal sage scrub.

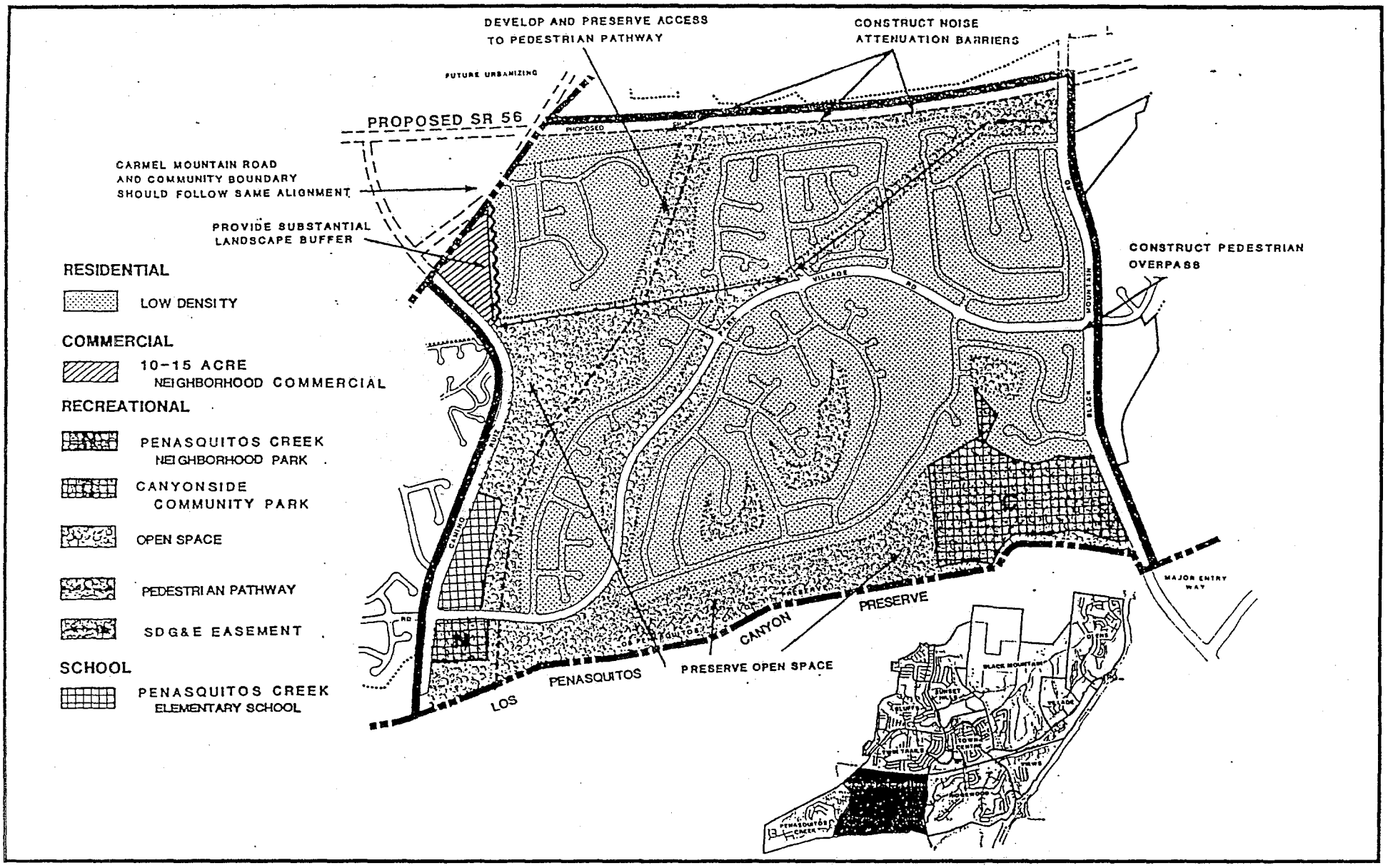
The plan proposes the extension of Paseo Valdear from its current terminus, about one-half mile east of Black Mountain Road, to Peñasquitos Drive. The construction of this road would have several adverse effects.



RANCHO PENASQUITOS
PENASQUITOS CREEK NEIGHBORHOOD

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure
12



RANCHO PENASQUITOS
PARKVIEW NEIGHBORHOOD
CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure
13

First, open space to the southeast of the road would be isolated from larger, more diverse open space, and an "island" would be created. Those open spaces are mostly steep slopes and small tributary drainages, but do not include any wide bottomlands. The isolation would result in reduced habitat diversity, interference with effective ecologic balances, and a reduction in the value of the open space. Maintenance of the value would require contiguous links to larger diverse open areas such as Black Mountain Park and the open space of the Future Urbanizing Area.

Second, the construction of Paseo Valdear through this steep terrain would require massive excavation resulting in the direct loss of chaparral and potentially in the loss of coastal sage scrub. Mixed chaparral has not been identified by the City as a sensitive habitat. Therefore, the loss of this vegetation would not be considered significant. However, coastal sage scrub is key habitat for the California gnatcatcher, and is a sensitive habitat. Therefore, any loss of this vegetation would be a significant impact.

Third, full extension of this road would discourage planning of clustered development. Clustering development would reduce the amount of grading, reduce the area over which noise and light disturbances would be emitted, and thereby reduce potential impacts on biological resources.

The plan proposes development of approximately 80 acres in the Peñasquitos Creek and Parkview neighborhoods combined. Such development may result in the direct loss of vernal pools, which are a sensitive resource in the City.

The plan proposes construction of another link of Camino Ruiz in the Peñasquitos Creek neighborhood. The construction would result in direct loss of coastal sage scrub, known habitat for the California gnatcatcher.

As discussed in the Existing Conditions section above, a high-volume wildlife corridor linking Los Peñasquitos Canyon and Deer Canyon is located in a tributary canyon near the proposed alignment of the extension of Camino Ruiz in the Peñasquitos Creek neighborhood. Implementation of several aspects of the proposed plan would potentially disrupt this corridor: the construction of the proposed elementary school at the northeast corner of the intersection of Camino Ruiz and Park Village Road; residential and commercial development on the mesa in Peñasquitos Creek neighborhood; and the construction of Camino Ruiz north to the community boundary.

Interference with the wildlife corridor would potentially have a significant adverse impact on wildlife life cycles. Wildlife establishes movement corridors to travel between habitats, and to move between food and water source areas. Some species may require different

habitats at times of the year for mating, breeding, or raising young. It is necessary to maintain access corridors in order to satisfy daily and seasonal habitat requirements.

As development occurs according to the proposed community plan, invasive plant species may be incorporated into private landscaping projects. The potential impact can be reduced significantly at the regulatory planning stage. Therefore, the proposed plan is not considered to have a significant impact on biological resources due to the potential for introduction of invasive species.

Significance of Impacts

The isolation of coastal sage scrub habitat on Hilltop Community Park is significant because of the impact on California gnatcatchers. As a result of fragmentation, the effective habitat area would be reduced, predation may increase, juveniles would be cut off from potential dispersal areas.

The direct loss of coastal sage scrub in any area of the community would be significant because of the impact on gnatcatchers.

The fragmentation of currently undisturbed habitat in the Black Mountain neighborhood would have a significant adverse effect on resources. Fragmentation and isolation of habitat leads to reduced species diversity and potential species extinction in a given area.

Because of the magnitude of regional losses of vernal pools, and the specialized plant community associated with them, any loss would be a significant adverse impact.

Wildlife corridors as links between various cover/food types are necessary in the life cycles and in routine daily movements in search of food or water, and in response to disturbances. Disruption of wildlife movement routes would have a significant impact.

The reduction in species diversity which would result from the loss of the riparian woodland habitat would be a significant adverse impact on biological resources.

Mitigation

The draft plan proposes to eliminate the connection of Camino Ruiz across Los Peñasquitos Canyon, but continue to the north from the north side of the canyon. The proposed alignment is along and near an existing wildlife corridor. In order to avoid the loss of the corridor and further mitigate biological impacts, the plan could include language that this stretch of Camino Ruiz would be eliminated if the plan is adopted, as proposed, to eliminate the crossing of Camino Ruiz across Los Peñasquitos Canyon. Adoption of this alternative would avoid the

loss of the wildlife corridor, and the direct loss of coastal sage scrub habitat which would also be impacted by the construction of this stretch of Camino Ruiz.

The plan could include language that vernal pools are a sensitive resource, which to the extent possible, should be included in open space. However, the impact would not be avoided unless further mitigation were required as a condition of development plans for individual projects.

The fragmentation of open space in the Black Mountain neighborhood would be mitigated by adoption of an alternative land use plan which would eliminate the full extension of Paseo Valdear to Peñasquitos Drive. Avoidance of the impact would only be achieved by conditions on future development permits in the neighborhood which would require adequate links between open space.

If Paseo Valdear is constructed, the value of the open space southeast of the road would be significantly reduced. However, the impact could be mitigated by adopting alternative language in the plan which would designate functions of various spaces by regulating activities.

Open spaces which are fragmented from other open space and isolated by roads and development maintain value as areas where people can access nature. Many of people's activities, such as littering, or destroying vegetation by making trails for walking and biking, can have harmful effects on resources. In addition, pet scents and marking can interfere with wildlife. If the areas with lower resources values are accessible to people and their pets, activities in high-value connected open spaces could be restricted to those with very low impact, thereby retaining the long-term viability of those areas. (Refer to Alternative 4C and Figure 5.)

E. LANDFORM ALTERATION/VISUAL QUALITY

Existing Conditions

The Rancho Peñasquitos community has two distinct landform types. Landforms in the northern portion of the community are steep slopes generally associated with Black Mountain. The southern portion of the community is characterized by gentler slopes and mesas. Black Mountain is the prominent topographical landmark in the Rancho Peñasquitos community, and has an elevation of 1,552 feet AMSL. Several other peaks within one mile of Black Mountain have elevations in excess of 1,000 feet AMSL.

In the northern portion of the community, the primary aesthetic resource is Black Mountain. Black Mountain peak is near the southern boundary of the 240-acre resource-based Black Mountain Park. The park has very few improvements; however, the peak is disturbed by numerous telecommunications structures and antennae. The existing high visual quality of the area is due to the undeveloped slopes of Black Mountain

and the adjacent vacant lands to the east and west. Canyons in the northern area are not as broad or as accessible as those in the south. The canyons and chaparral-covered hillsides are visible from some of the developed neighborhoods in the community, from Carmel Mountain Road, from Interstate 15, and from the North City Future Urbanizing Area.

The southern portion of the community is situated on the generally south-facing slopes and flat mesas north of Los Peñasquitos Canyon. This area is characterized by a series of northwest- to southeast-trending ridges separated by canyons of various sizes, which are mostly tributaries to Los Peñasquitos Creek. Slope gradients range from less than one percent, in the canyon bottom, to over 50 percent on some of the steeper tributary canyon walls. Elevations in this area range from 275 feet above mean sea level (AMSL) in the canyon bottom to 500 feet AMSL on some of the ridges west of Black Mountain Road. Elevations on the mesas in the southwest portion of the community are about 450 feet AMSL.

The primary aesthetic resource of the southern portion of the community is Los Peñasquitos Canyon and those tributary canyons that remain undeveloped. The main canyon bottom retains a rural atmosphere despite past disturbances from the construction of trails, roads, utility lines, grazing operations, and a limited number of structures.

Impacts

Extensive residential development in an area with varied topography such as the Rancho Peñasquitos community usually results in topograhpic modifications. Grading operations usually lead to the creation of artificial terraces on hillsides, or the removal of ridgetops and the filling of canyon bottoms. Since there is no objective way to judge conformance of future development proposals with the proposed community plan in terms of their environmental sensitivities, substantial topographic modifications and loss of aesthetic resources could occur after the adoption of this proposed plan. Although specific grading designs are not available at this stage in the planning process, given the patterns of past development within the area and the steepness of remaining undeveloped land, substantial landform alterations may be expected as future single-family residential neighborhoods are developed.

The most significant visual alteration resulting from development according to the proposed plan would be in the Black Mountain neighborhood, with the development of existing vacant lands designated for residential development. The existing chaparral and coastal sage scrub covering steep terrain with many rock outcrops would be replaced with the manufactured slopes, streets, houses, schools, and parks of residential communities. Preliminary engineering indicates that fill slopes of 180 feet and cut slopes of 80 feet (at 1.5:1 horizontal: vertical gradient) would be required for some of the proposed development in this area. Millions of yards of earth moving would be

required to remove existing ridges and fill in canyons for the development of approximately 800 dwelling units.

A second significant visual alteration would result from the development in the Peñasquitos Creek neighborhood. The construction of a stretch of Camino Ruiz is associated with this development. This particular stretch of the road extends through an undisturbed canyon (a tributary to Los Peñasquitos Creek) and up undisturbed hillsides to the mesa. The canyon is lush chaparral and the hillsides are vegetated with sparser chaparral and coastal sage scrub. The construction of the road would result in the loss of the vegetation, the loss of the natural drainage channel (it would probably be confined to a narrow, deeper channel protected by riprap as in the downstream stretch), and the alteration of the natural hillside formations. The road would be visible from the park preserve, and visual attention would be focused on the road, rather than the natural conditions that exist now.

The draft plan proposes an Industrial Element to address a lack of Recreational Vehicle parking/mini-storage facilities in the community. The proposed plan designates approximately 10 acres for this use at the southwest corner of the intersection of Interstate 15 and State Route 56 (see Figure 3). The proposed parking/storage facility may potentially have a significant impact on the visual quality of the area, if not sensitively designed and screened.

Significance of Impact

The conversion of native landforms and vegetation to manufactured urban forms would have a significant adverse impact on the visual nature of the area and the quality of views afforded residents and travelers on the interstate where undisturbed slopes of Black Mountain are highly visible. In addition, the encroachment of development on such a prominent landmark as Black Mountain and the loss of another important canyon area contributes incrementally to the reduction in visual diversity in the City as a whole.

Mitigation

Although landform modifications are necessary for residential development, the visual impact of grading and development can be reduced through innovative building and street design and sensitive neighborhood layout. The proposed plan includes some recommendations in the Community Appearance and Design Element. Implementation of these recommendations can only be assured if specific development proposals are required to implement such guidelines. The update recognizes the importance of the Black Mountain area and has reduced the density and specified more stringent design criteria.

The plan indicates the construction of Paseo Valdear through the extremely rough terrain south and east of the mountain. Adoption of an alternative land use plan in the Black Mountain area would mitigate the potential impacts on visual quality for residents. Such an alternative

would show clustered development which would reduce the need for extension of infrastructure improvements as well as reduce the total area affected by grading. Paseo Valdear is required only to serve a single subdivision; therefore, by compacting development, the need for the extended alignment is eliminated. In addition, the views of the eastern slopes of Black Mountain from Interstate 15 would be less impacted if this alternative were adopted.

However, visual impacts could only be mitigated to below a level of significance by extension of Black Mountain Park to incorporate the upper slopes, or by including the remaining areas in a R1-40,000 Zone which would permit one dwelling unit per acre.

The potential visual impact associated with conversion of open space to industrial use could be mitigated in one of two ways. First, by requiring a sensitive design with adequate screening, the designated site may be used without resulting in a significant impact on visual quality. Second, by locating the use in nearby Sabre Springs where land is already designated for industrial use, the potential visual effects could be avoided.

Adoption of the alternative which proposes distinctions between functions of open space would reduce the impact of creating open space "islands" because those activities which are harmful and disruptive to wildlife and plants would be concentrated in areas which have lower potential for long-term viability.

F. HYDROLOGY/WATER QUALITY

Existing Conditions

The Rancho Peñasquitos community is within the Peñasquitos Hydrologic Unit, according to the designations by the California Department of Water Resources. The unit is approximately 170 square miles of land in a triangular-shaped area which extends from La Jolla to Poway.

Miramar Reservoir is the largest storage facility in the Peñasquitos Hydrologic Unit and it contains only imported Colorado River water. There is limited groundwater in the unit.

In the late 1960s the water quality in the unit was rated marginal for domestic purposes and suitable to inferior for irrigation, depending on location in the drainage area. The groundwater in the area has a high salt content due to salt water trapped within sedimentary rocks as they were formed.

There are no perennial streams in the area, but there are numerous creeks which collect runoff from seasonal rainfall events in the watershed. Runoff from most of the community drains ultimately into Los Peñasquitos Creek. The creek drains into the Los Peñasquitos Lagoon, and ultimately into the Pacific Ocean.

Los Peñasquitos Lagoon is approximately 385 acres, near the northern limit of the City of San Diego. The lagoon is an important habitat that has been the focus of considerable scientific study. There is concern that pollutants and sediment from upstream sources will disrupt the delicate lagoon microenvironment.

In compliance with recent amendments to the federal Clean Water Act which established the National Pollution Discharge Elimination System (NPDES) Permit process, the Engineering & Development Department is developing a Citywide nonpoint source pollution control and management program. Solutions to nonpoint pollution are regional in scope, rather than designed on a project level basis; however, the practices may be implemented on individual projects.

Issue 1: Would development according to the updated community plan result in changes in infiltration rates, or the rate and amount of surface runoff?

Issue 2: Would development according to the updated community plan result in alteration of surface or ground water quality?

Issue 3: Would future development result in discharge into surface or ground waters significant amounts of pesticides, fertilizers, or other noxious substances?

Impact

Urban stormwater runoff is a major contributor to nonpoint source pollution of surface waters in the San Diego region. Each time it rains, pollutants are washed off streets, roofs, lawns and landscaped areas, parking lots and other urban land uses into stormwater collection and drainage devices. A wide variety of pollutants are moved into the surface runoff from these sources: sediment; heavy metals; oil; grease; petroleum derivatives including gasoline; fertilizers; pesticides; animal wastes; salts; and bacteria.

Urban development also affects the hydrologic characteristics of a watershed and thus affects the volumes and rate of stormwater runoff. There is more frequent flooding because of a reduction in pervious area for infiltration of precipitation. In addition, there is increased streambank erosion, and increased sedimentation in riparian systems and estuaries.

According to the proposed update, there is the potential for approximately 1,000 acres to be approved for the development. Short-term impacts would include increased levels of erosion and siltation from grading and construction activities.

Long-term effects include an increased amount of runoff, a decrease in surface water quality, and reduced groundwater recharge from the development sites. The increase in impervious surface area and conversion to urban uses would have a two-pronged impact: 1) to increase

the amount of runoff from the site; and 2) an impediment to infiltration of precipitation for potential recharge of the groundwater reservoir. Irrigation and other sources of imported water also increase the amount of runoff.

Significance of Impact

Development projects built according to the proposed Rancho Peñasquitos Community Plan update would contribute individually and incrementally to the increase in suspended urban pollutants entering Los Peñasquitos Creek. The impact to the surface water quality from storm and drainage runoff would be significant.

Mitigation Measures

No measures are currently available to mitigate the individual and incremental impacts of the potential development on the surface and groundwater quality of Los Peñasquitos Creek. Municipalities in the San Diego region must comply with the California Regional Water Quality Control Board NPDES Permit No. 0108757, which consists of wastewater discharge requirements for stormwater and urban runoff. To comply with the permit the city must complete a Better Management Practices Program. The program will detail water quality control measures to be implemented on a citywide basis. Long-term implementation of the program would mitigate the potential development's contribution to individual and cumulative water quality and hydrology impacts.

G. NOISE

Existing Conditions

The primary source of noise in Rancho Peñasquitos is vehicular traffic on Interstate 15, along the eastern project boundary. The second most significant source of noise is vehicular traffic on State Route 56 (SR 56) which bisects the community. Thirdly, many of the major streets in the community carry traffic that is a significant noise source.

Since all of the roadway segments expected to produce noise levels in excess of 60 dB(A) would be at least four-lane major roads, no homes would front directly on the roadways. Where the major roads are adjacent to single-family residential neighborhoods, large building setbacks or barriers such as berms and walls have been or would be constructed to reduce exterior noise levels.

An additional area noise source, Naval Air Station, Miramar (N.A.S. Miramar) is located approximately five miles south of the southern community boundary. Although the entire community is at least two miles outside of the 65 dB(A) contour for air station-generated noise, the 60 dB(A) contour does extend about three-tenths of a mile into the southwestern extremity of the community.

Impacts

The Transportation Element of the City of San Diego Progress Guide and General Plan establishes land use and noise compatibility standards. Exterior noise levels in excess of 65 dB(A) are not considered to be compatible with residential development. If the structure or outdoor living area would be 50 feet or less from the center of the outside lane of a street where traffic volumes are 7500 ADT or greater, the exterior noise levels may exceed 65 dB(A). In addition, standard residential construction generally attenuates exterior noise by about 15 dB. Therefore, where exterior noise levels are 65 dB, interior noise levels would be approximately 50 dB unless special construction materials or techniques are used.

The California Code of Regulations, Title 24 establishes an interior noise standard of 45 dB(A) for multi-family dwellings. Additional structural noise insulation may be required to attenuate noise where exterior levels exceed 60 dB(A) CNEL.

Figure 6 is an illustration of the anticipated average daily trips at buildout on the major roadways in the community. The figure shows that the street segments with future volumes in excess of 7500 ADT are all major streets where exterior living areas would be greater than 50 feet from the street. Therefore, no significant impact associated with traffic noise is anticipated based on calculated future traffic volumes.

Noise from jet aircraft operations at N.A.S. Miramar creates minor nuisances within Los Peñasquitos Canyon. Jet aircraft departing northward form the station cause single noise events ranging from 75 to 85 dB(A) in the Los peñasquitos Canyon area. However, since the entire community is well outside the 65 dB(A) contour, the noise levels produced by the nearby aircraft are not considered to be a significant impact.

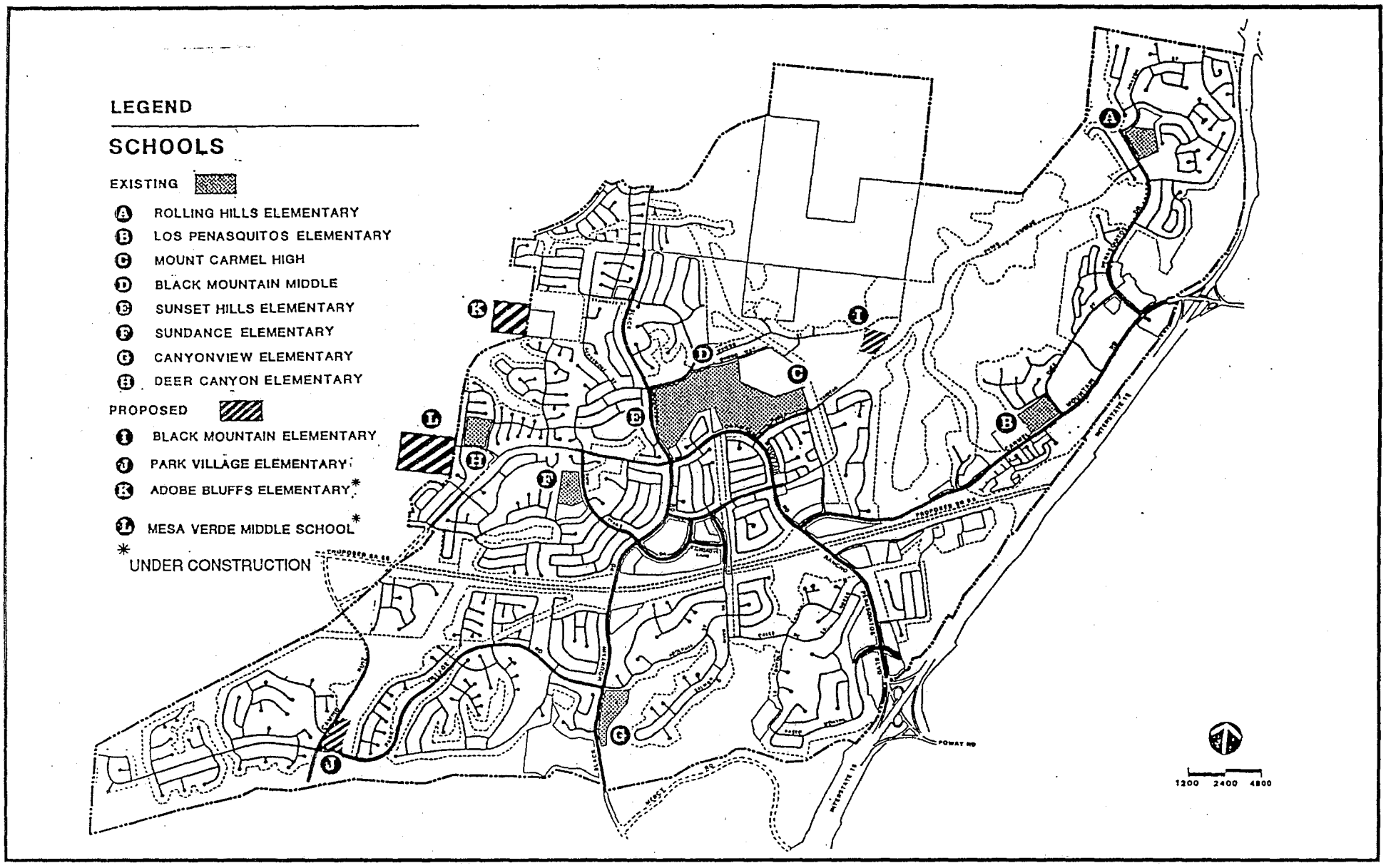
The only other noise generated by implementation of the proposed plan would be associated with short-term grading and construction operations. These activities would be limited to normal working hours and are required to comply with the City Noise Ordinance. Therefore these short-term conditions are not expected to have a significant impact on the community.

Analysis of Significance

No significant impact on the acoustical environment is anticipated from future traffic that would be generated as a result of development according to the proposed plan.

Mitigation

No measures are required.



RANCHO PENASQUITOS

SCHOOLS

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure 14

V. GROWTH-INDUCING IMPACT OF THE PROPOSED PROJECT

The proposed community plan update is consistent with the City of San Diego Progress Guide and General Plan. Public services and facilities within the City's jurisdiction are planned to meet the needs of anticipated growth based on the General Plan.

The proposed plan shows two schools in the Future Urbanizing Area adjacent to the Rancho Peñasquitos community (see Figure 14). According to the Poway Unified School District, which provides public school facilities for Rancho Peñasquitos and Rancho Bernardo, the Adobe Bluffs Elementary School and the Mesa Verde Middle School are needed to relieve overcrowded conditions at the existing facilities in those communities. In addition, the schools would provide excess capacity for future growth in existing communities.

However, the placement of schools and the accompanying extension of infrastructure in the urban reserve does remove an impediment to development. Should residential development be proposed in the urban reserve, facilities for elementary and middle school students would be in proximity, and roads and public utilities would have to be extended a shorter distance. Therefore, public school construction in the Future Urbanizing Area induces growth by providing services and facilities, the absence of which could make future development more difficult.

VI. CUMULATIVE IMPACTS

Significant cumulative impacts have been identified in the analysis of the major environmental issues addressed in this EIR. A brief discussion of each of these cumulative impacts is provided below.

Traffic Circulation

The draft plan proposes elimination of the previously planned-for extension of Camino Ruiz between Mira Mesa and Rancho Peñasquitos across Los Peñasquitos Canyon. The City's Engineering and Development Department has calculated that the resulting congestion in Mira Mesa would have significant cumulative impact on three major intersections in that community because, despite improvements, those intersections would operate at a Level of Service of "D" or worse.

In addition, elimination of an additional arterial parallel to Interstate-15 would result in greater congestion of I-15 and I-5 because those existing roads would be carrying short-distance local traffic instead of only interregional traffic as they were designed. This additional congestion would incrementally impact regional traffic circulation.

Air Quality

Development in Rancho Peñasquitos according to the proposed plan would significantly impact air quality in the region by adding incrementally to automobile emissions. Although the plan proposes reduced development densities compared to the adopted plan, any new development would generate additional emissions which would aggravate the existing non-attainment condition.

In addition, the draft plan proposes to eliminate the connection of Camino Ruiz between Mira Mesa and Rancho Peñasquitos. Elimination of this previously planned for arterial would result in increased congestion and lower levels of service on Mira Mesa roadways. The increased congestion has cumulative impacts on air quality in the San Diego region.

Landform Alteration

The larger acreage of remaining undeveloped portions in the northern portion of the Rancho Peñasquitos community are on the slopes of Black Mountain. The natural vegetation and landforms create an aesthetic visual character. As the area develops in accordance with the community plan, the project area will lose this visual character. The development in combination with the existing development would have a cumulative effect on the visual quality of the area by eliminating natural vegetation, altering landforms and changing the visual character from open space to development.

Biological Resources

Development according to the community plan would exacerbate the existing losses of vernal pools and coastal sage scrub in the community. Continued losses of these resources is significant because of the magnitude of historical regional losses. Coastal sage scrub is a plant community which provides the prime habitat for the California gnatcatcher, a bird which is a candidate for the federal endangered species list. Vernal pools provide hydrologic and soil requirements for several plants which are candidates for the federal endangered species list.

Hydrology/Water Quality

Development according to the community plan would increase runoff into Los Peñasquitos Creek. This runoff would carry additional urban pollutants and sediment. The accumulation of suspended and dissolved solids also affects Los Peñasquitos Lagoon. The impacts are most effectively reduced by regional programs and facilities.

Water Conservation

Adequate water supply to meet municipal consumptive demands is a problem in the San Diego region. Most of the municipal supplies are imported because there are limited local reserves; most of the local aquifers are not suitable for municipal potable uses.

Precipitation cycles in southern California are characterized by several years of low rainfall amounts followed by one or two years of higher rainfalls. Average precipitation in the local area is approximately 10 inches per year, making this a semi-arid region.

Urbanization of the area has brought the introduction of golf courses and drought-intolerant landscaping which have required the use of the limited potable water. With high regional growth rates, it has become increasingly more difficult to meet municipal demands. Recent trends in landscaping have reduced new turf and incorporated drought-tolerant species, but maintenance of existing vegetation is still a consideration.

All of these factors - lack of local supplies, climatic conditions, regional growth and facilities demands - must be considered in measuring the potential impact of new development on water supplies. While proposed water reclamation facilities may improve the situation in the future, at the present time, any new development would be considered to have an incrementally significant impact on water resources in the area.

The Rancho Peñasquitos community is 85 percent built. Water use associated with the development of the remaining properties would not be considered to have a directly significant impact on resources. However, the approval of that development in combination with approvals of development in other areas of the City, would be significant on a cumulative basis.

VII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Almost all of the area that would be affected by implementation of the proposed Rancho Peñasquitos Community Plan is not presently productive in an economic sense. That is, the areas are not being used for any defined purposes by people. The areas do, however, have biological, hydrological, and visual value. Implementation of the Plan would remove or disrupt many of these values. The use of the areas by wildlife and as non-active natural lands within a developing urban area would be replaced by residential, commercial, and possibly industrial, uses. No long-term risks to health or safety would result from development according to the proposed Plan.

If implementation according to the proposed Plan does not occur, the areas would remain undeveloped and the demand for public services would not be created. In addition, the visual character of the undeveloped property would be maintained and the surface features undisturbed.

VIII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES INVOLVED IN THE IMPLEMENTATION OF THE PROPOSED ACTION

The irreversible environmental changes which would result if the proposed project were to be implemented include the utilization of materials necessary to construct the permitted units, the elimination of open space and wildlife habitat, and the alteration of the natural landform and drainage.

Implementation of the Plan would introduce people and structures into previously undeveloped areas, and with them an increase in automobile emissions, traffic, noise, and other urban conditions. These effects are considered permanent. The magnitude of these permanent changes could be reduced by adoption of alternative language for the Plan to recommend clustered development, reduced density, defined uses of open space to funnel people and pets to island open space, and elimination of the extension of Paseo Valdear to Peñasquitos Drive. In addition, implementation of an alternative to locate a recreational vehicle storage area in an adjacent community's existing industrial area would reduce the permanent change of open space to storage lot.

The environmental effects of implementing the proposed Plan are discussed for each issue within this EIR. The proposed project would result in significant impacts to visual quality by landform alteration and conversion of open space to industrial use. In addition, there would be significant impacts on biological resources and the acoustical environment. These potential impacts could be mitigated on a project-specific level. The cumulative impacts to water quality/hydrology are regional in scope and effectively mitigated only through area-wide programs and facilities.

IX. ALTERNATIVES

The State CEQA Guidelines (Section 15126d) requires the discussion of alternatives which achieve the basic goals of the project and reduce significant impacts associated with the proposed project. The alternatives discussed below are intended to eliminate or reduce the significant impacts of the proposed draft community plan on biological resources, visual quality, landform alteration, air quality, and traffic circulation. In addition, CEQA requires a discussion of "no project" to identify the consequences of not adopting the proposed community plan.

1. No Project A

The No Project A (No Physical Change in the Environment) Alternative is equivalent to a maintenance of existing physical conditions, and functions as a baseline scenario, considered here primarily for comparison with the other alternatives. The No Project alternative would preserve existing environmental resources on-site. Maintenance of existing physical conditions would not be anticipated to occur due to a significant number of projects in process.

1a. No Project B

The No Project alternative would result in retention of the goals and recommendations of the adopted community plan.

The proposed recommendations and guidelines for landform-sensitive development and reduced densities in the Black Mountain neighborhood would not be adopted. The previously-planned connection of Camino Ruiz between Mira Mesa and Rancho Peñasquitos would be retained as a recommended transportation element. Associated with the construction of Camino Ruiz between the two communities would be the reduction of traffic circulation and air quality impacts, and the potentially significant impacts on biological resources and visual quality.

2. Public Facilities

There are four alternatives associated with public facilities, specifically roadways, that would mitigate potentially significant environmental impacts if the draft plan is adopted.

a) Camino Ruiz across Los Peñasquitos Canyon

The adopted community plan and the Progress Guide and General Plan show Camino Ruiz extended across Los Peñasquitos Canyon to connect Mira Mesa and Rancho Peñasquitos. The draft plan proposes to eliminate that connection, and thereby eliminate a potential north-south arterial.

This alternative would be identical to the current proposal with the exception of the recommendation regarding the extension of Camino Ruiz across Los Peñasquitos Canyon. Under this alternative, the plan would recommend the extension of Camino Ruiz across the canyon as a four-lane bridge structure. Specific design standards would be added to the community plan's Open Space Element and the Transportation Element in an effort to reduce the significance of the visual and biological impacts that would occur as a result of construction. The design criteria would prohibit the placement of fill within Los Peñasquitos Canyon Preserve. The criteria would include a requirement that the structure span the Preserve, with only minimal intrusion permitted within the canyon in order to install supports. The plan would require public involvement in the bridge design selection process, because the architectural design of the bridge would be as important as the structural design.

As stated in the No Project alternative, there are effects associated with the connection of Camino Ruiz between Mira Mesa and Rancho Peñasquitos. Specifically, impacts on traffic circulation and air quality would be reduced, and potentially there would be impacts on biological resources and visual quality.

The implementation of this alternative would eliminate the direct and cumulative traffic impacts that would result from elimination of the extension of the road. In addition, the direct air quality impacts would be alleviated.

Elimination of the previously-planned north-south arterial would have circulation impacts in Mira Mesa. The resultant congestion would cause increased emissions and have an adverse effect on air quality. However, cumulative impacts on air quality would still result from the development of remaining undeveloped properties in both Mira Mesa and Rancho Peñasquitos, whether Camino Ruiz is built across the canyon or not.

With the adoption of this alternative, however, potentially there would be impacts to biological resources from the direct loss of irreplaceable habitat due to grading and construction, and due to interference with wildlife movement corridors. In addition, potentially there would be visual impacts associated with a bridge structure in the Preserve.

b) Delay the deletion of the Camino Ruiz connection

This alternative would be identical to the current proposal with the exception of requirements relative to the Camino Ruiz crossing. Rather than delete the potential for the future extension of the roadway, the plan would recommend that the right-of-way required to build the crossing as a four-lane bridge be protected. Under this alternative, the right-of-way for the Camino Ruiz alignment across the canyon would be preserved; however, construction would not be inevitable.

This alternative would allow the planning that is currently underway within the North City Future Urbanizing Area to be completed prior to eliminating the roadway from plans, and therefore the full impact of the loss of the north-south arterial could be evaluated. A delay could also provide time to fully evaluate the feasibility and associated potential impacts of constructing a sensitively-designed bridge across the canyon.

However, this alternative would also result in potential biological impacts because the stretch of Camino Ruiz in the Peñasquitos East Neighborhood would likely be built in anticipation of the roadway being completed in full length. This would result in the direct loss of coastal sage scrub habitat and the loss of an important wildlife corridor.

c) Camino Ruiz in the Peñasquitos Creek and Parkview Neighborhoods

As discussed in the Biology section of this report, there is an important wildlife corridor extending between Deer Canyon in the Future Urbanizing Area and Los Peñasquitos Canyon. A portion of the corridor is located in a tributary canyon which is the

designated alignment for Camino Ruiz north of the existing Parkview Unit 14 subdivision. Construction of the stretch of Camino Ruiz proposed in the Peñasquitos Creek and Parkview neighborhoods would eliminate this corridor.

This alternative proposes to eliminate approximately 1,700 feet of Camino Ruiz from the community plan, and for the roadway to commence at the boundary of the Future Urbanizing Area. This alternative is feasible only if the community plan update is adopted with the elimination of the connection of Camino Ruiz across Los Peñasquitos Canyon. If the Camino Ruiz crossing if the canyon is retained in the General Plan, the Rancho Peñasquitos Community Plan, and the Mira Mesa Community Plan, all segments of the roadway would have to be completed as currently planned.

However, if the community plan is adopted showing the withdrawal of Camino Ruiz across the canyon, the elimination of another stretch in Rancho Peñasquitos may be a feasible measure to avoid a significant biological impact. A traffic study would be required in association with the development proposal which would be responsible for construction of this portion of Camino Ruiz. The study would be required in order to evaluate the impact on traffic circulation in the community if this portion of Camino Ruiz is not built. Access to the remaining residentially-designated land in this area could be through the western portion of the Parkview Unit 14 subdivision.

d) Paseo Valdear

As stated in the Landform Alteration section and the Biology section of this document, the proposed extension of Paseo Valdear to Peñasquitos Drive through the Black Mountain Neighborhood would have significant impacts. This alternative proposes to eliminate that extension.

According to the Engineering and Development Department, the roadway may not be essential to efficient circulation patterns in the community. The extension of Paseo Valdear was planned solely to serve future development in the immediate area. However, if development is compacted on the lower slopes of Black Mountain adjacent to the existing urban development, the full extension of the road through extremely steep terrain would not be warranted. Adoption of this alternative would likely not affect traffic circulation in the community.

3. No Industrial Element

The draft plan proposes to include an Industrial Element and to designate approximately 10 acres for Recreational Vehicle parking/mini-storage. The site proposed for this designation is highly visible from Interstate 15 and State Route 56, is accessible only through an apartment/condominium complex, and is currently designated

open space. Such a use on the proposed site would have a significant visual impact if not designed to be well-screened. This alternative proposes eliminating the Industrial Element from the community plan, and locating the parking/storage facilities in the industrially-zoned area of the neighboring Sabre Springs Community.

Adoption of this alternative would achieve the goal of relieving RV parking on residential streets in Rancho Peñasquitos, while avoiding the potentially significant visual impact of locating the needed facilities in such an acute position. The Sabre Springs Community is proximate to Rancho Peñasquitos, and already has areas zoned where these facilities are permitted.

4. Black Mountain Neighborhood

The majority of the remaining undeveloped area in the Black Mountain neighborhood is at and above an elevation of about 700 feet above mean sea level (AMSL). The 700-foot contour also approximately demarks the steeper terrain around the southern and eastern slopes of Black Mountain from the lower gradient foothill slopes which have been developed.

There are two alternatives for avoiding significant landform alteration, visual and biological impacts associated with development according to the draft community plan in this neighborhood. As proposed, the plan designates residential use far up the southern and eastern slopes of Black Mountain adjacent to the park. In addition, an elementary school would be located in this steep terrain, and roads would cut across the contours of the slopes.

a) Very low density (A-1-10)

This alternative involves reducing development densities over the entire remaining undeveloped area and retaining the existing agricultural zone. The very low density (A-1-10) alternative proposes one dwelling unit per ten acres with guidelines for landform-sensitive building, such as modified A-frame or stepped pad designs and little or no formal landscaping. Fire retardant measures, such as xeriscape techniques which use plants adapted to the semi-arid climate but reduce fuel loads, could be incorporated into the design guidelines for the area.

This alternative would reduce biological impacts because there would be less grading and the natural vegetation between units would permit most wildlife movement to continue uninterrupted. In addition, visual impacts and landform alteration would be reduced: the building designs would require only nominal grading; the structures would blend with the surroundings; streets would be narrower requiring less grading; reduction of formal landscaping would help development blend rather than contrast with native vegetation. The streets would carry less volume and therefore wildlife movement would be less of a traffic safety hazard than on higher volume streets. In addition, smaller streets with less

volume would not be as significant an impediment to wildlife movement as the larger streets.

However, with this alternative, the elementary school would still be located in the steep terrain south of Black Mountain peak. The site currently is the top and west-facing sideslope of a small ridge below the peak. The elevation of the ridgetop is approximately 1,000 feet AMSL. The school site is between about 800 and 1,000 feet AMSL. Based on designs typical of other schools in the area, it is anticipated that a flat pad would be excavated.

b) Compacted development/increased density

This alternative involves clustering the remaining permitted units in the Black Mountain Neighborhood at the lower elevations near existing development. This would result in higher densities over a smaller area.

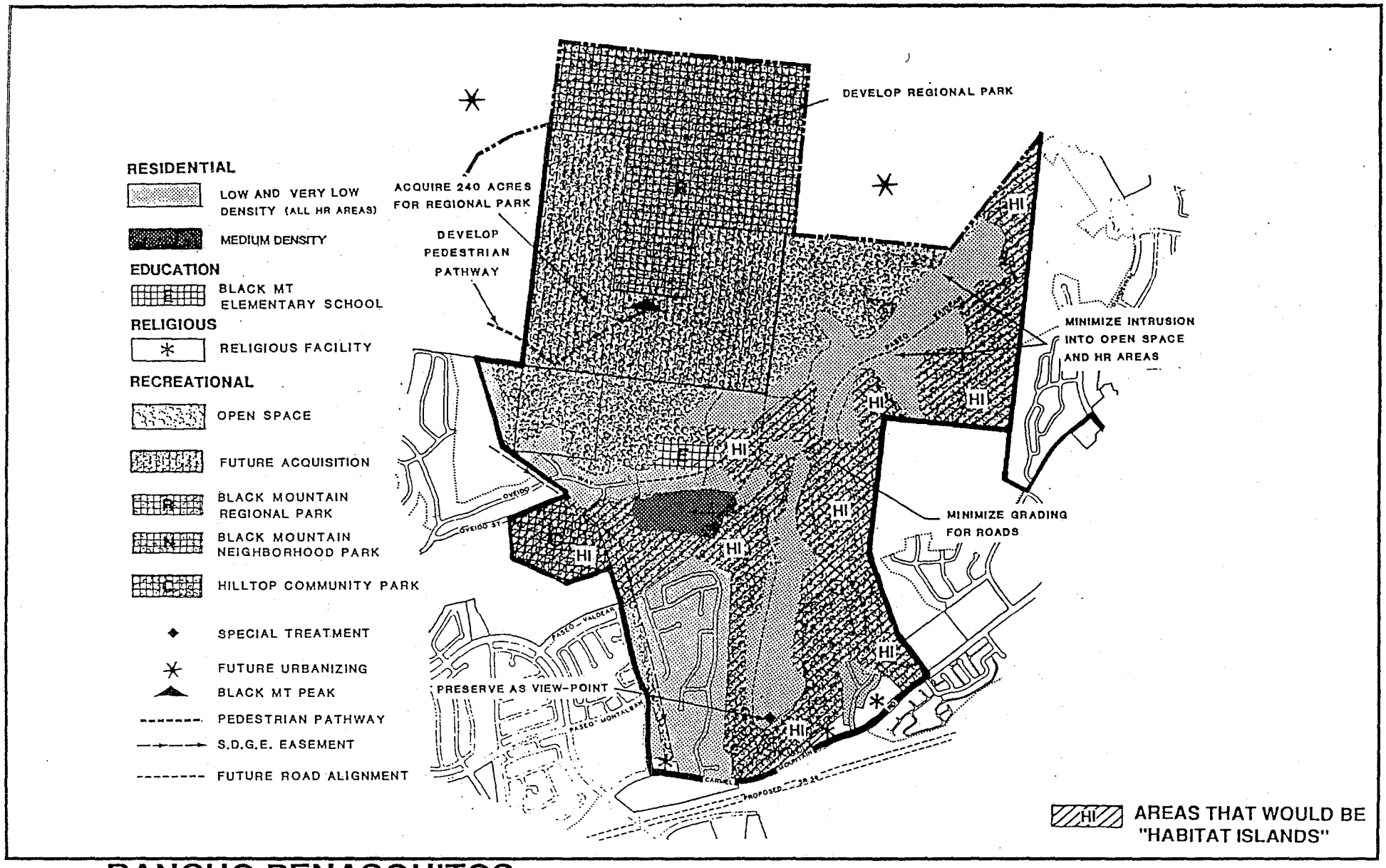
Adoption of this alternative would reduce impacts on landform, biological resources, and visual quality.

c) Open space policies

This alternative was developed for the Black Mountain Neighborhood open space. It is an alternative that provides for language to be included in the Black Mountain Neighborhood and Open Space Elements of the community plan which would encourage use of the lower-value habitat "islands" and, thus, retain the higher habitat values of the "connected" open spaces.

The relatively undisturbed slopes is the one of the key features of Black Mountain that has caused it to be identified as a cornerstone of the larger open space system in the Future Urbanizing Area. Although the draft plan shows Black Mountain Park to be developed, as part of the regional open space network, it would likely remain largely as it is today, with very little public access. Because Black Mountain would likely be an important link in a regional open space system, open spaces which surround it have a higher habitat value than those spaces which would be separated by roads or development.

If development occurs according to the draft plan, the open space in the Black Mountain Neighborhood would be fragmented by roads and development. That is, some of the open spaces would not be connected to a large system containing the diversity necessary for long-term viability and ecosystem balance. Therefore, from a wildlife management standpoint, these "island" fragments have limited long-term value.



RANCHO PENASQUITOS-
OPEN SPACE "ISLANDS" IN BLACK MOUNTAIN NEIGHBORHOOD

CITY OF SAN DIEGO • PLANNING DEPARTMENT

Figure
15

However, these "islands" continue to be home to many indigenous plants and animals. They are especially valuable as accessible places where people can go with pets and have a sense of "getting out in the open." The lower wildlife habitat value does not reduce the value of these areas as outdoor space for people and pets.

This alternative is to propose that language be included in the plan which recommends open space policies to encourage use of the "island" open spaces and encourage limited access to the open spaces which would remain connected to a large regional system. Figure 15 is an illustration of the "islands" of open space that would result if development occurs according to the draft plan.

Policies recommending use of the lower-quality spaces and recommending development of accessibility to these areas would relieve the pressure to accommodate human/pet access in higher-quality habitat areas. The higher quality areas could then retain their value and not be subject to as many of the impacts associated with human/pet activities.

Adoption of this alternative would further mitigate impacts to biological resources associated with development according to the draft plan. This alternative could be adopted in conjunction with the "compact development" alternative because adoption of that alternative would likely result in "island" open spaces.

X. REFERENCES

"Vegetation of San Diego"; California Department of Fish & Game Endangered Plant Program.

"Bird Species of Special Concern in California"; California Department of Fish & Game.

"Mammalian Species of Special Concern in California"; California Department of Fish & Game.

"California's State Listed Threatened & Endangered Plants and Animals"; California Department of Fish & Game.

City of San Diego Archaeology Library

City of San Diego Progress Guide and General Plan

City of San Diego Vernal Pool Maps

Memorandum from Engineering and Development Department, Transportation Planning Division, 11-6-90, "Transportation Recommendations for Mira Mesa and Penasquitos East".

Peñasquitos East Community Plan EIR, City of San Diego, 1978, (EQD No. 78-05-48)

Peñasquitos East Community Plan, City of San Diego, 1978.

Rancho Peñasquitos Community Plan, Second Draft, City of San Diego, July, 1991.

Code of Federal Regulations, Title 50, Part 17, "Endangered and Threatened Wildlife and Plants".

Kennedy, Michael P. and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7.5 Minute Quadrangles", California Division of Mines and Geology Bulletin 200, Sacramento, 1975.

U.S.D.A. Soil Conservation Service Soil Survey of the San Diego Area, California, Parts I and II, December, 1973.

XI. ENVIRONMENTAL IMPACT REPORT PREPARATION

This Environmental Impact Report was prepared by the City of San Diego, Planning Department, Development and Environmental Planning Division, Environmental Analysis Section, located at 202 "C" Street, Fourth Floor, San Diego, California. The following professional staff participated in the preparation:

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FINDINGS
(DEP NO. 89-1222)

The California Environmental Quality Act (CEQA) requires that no public agency approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant impacts unless such public agency makes one or more of the following findings:

A) Changes or alterations have been required in, or incorporated into, the proposed project which mitigate or avoid the significant environmental impacts identified in the completed environmental impact report.

B) Such changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency or can and should be adopted by such other agency.

C) Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

(Sec. 21081 of the California Environmental Quality Act)

CEQA further requires that, where the decision of the public agency allows the occurrence of significant effects which are identified in the final EIR, but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or information in the record (SEC. 15093 of the CEQA Guidelines).

The following Findings and Statement of Overriding Considerations have been submitted by the project applicant as candidate findings to be made by the decisionmaking body. The Environmental Analysis Section of the City of San Diego Planning Department does not recommend that the decisionmaking body either adopt or reject these findings. They are attached to allow readers of this report an opportunity to review the applicant's position on this matter.

FINDINGS
FOR THE RANCHO PENASQUITOS COMMUNITY PLAN

DEP No. 89-1222
November, 1992

The findings set forth below pertain to the proposed Rancho Penasquitos Community Plan update (dated November 1992). The proposed Rancho Penasquitos Community Plan has been prepared by the City of San Diego Planning Department in cooperation with the Rancho Penasquitos Community Planning Board, public agencies and other interests.

The November 1992 draft community plan supersedes the currently adopted Penasquitos East Community Plan (adopted on October 17, 1978) and a previous draft Rancho Penasquitos Community Plan update (dated July 1991). The Rancho Penasquitos Community Plan update was prepared in response to a number of changes that occurred in the community since the adoption of the 1978 plan.

As indicated in EIR 89-1222, significant unmitigated environmental impacts would result if the July 1991 draft Rancho Penasquitos Community Plan were adopted and implemented. In response to the environmental impacts addressed in the EIR, the November 1992 draft Rancho Penasquitos Community Plan has been prepared with Findings and a Statement of Overriding Considerations..

Having reviewed and considered the information contained in the Rancho Penasquitos Community Plan's Final Environmental Impact Report (EIR 89-1222) and the related documents and record, the Council of the City of San Diego has made the following findings pursuant to Section 15093 of the California Administrative Code:

A. The City Council finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental impacts as identified in Final EIR 89-1222.

1. MITIGATION MEASURES INCORPORATED INTO PROJECT

a) <u>BIOLOGY</u>:

<u>Impact:</u> Development according to the July 1991 draft Rancho Penasquitos Community Plan would result in the direct loss of coastal sage scrub, fragmentation of habitat, the direct loss of vernal pools, and the potential disturbance of major wildlife movement corridors.

Finding: A draft Rancho Penasquitos Community Plan, dated November 1992, has been prepared to designate approximately 200 additional acres of open space in the Black Mountain neighborhood which will help to avoid the loss of biological resources, including coastal sage scrub, habitat areas, and wildlife movement corridors. In addition, the proposed community plan land use map has been revised in the Black Mountain neighborhood to reduce residential densities. This reconfiguration and reduction of developable property also helps to avoid the loss of biological resources in the community.

Previously proposed roads in the July 1991 draft Rancho Penasquitos Community Plan have been eliminated or reclassified in the November 1992 draft community plan. In the Black Mountain neighborhood, one wildlife corridor would be preserved by reclassifying a portion of Paseo Valdear from a collector street to an emergency access roadway. The design of this road segment will not include shoulders; the right-of-way will be much narrower; and the roadway will more closely follow existing topography. Moreover, the road reclassification will better address the EIR issue of providing an interconnected open space system (i.e. though Black Mountain Regional Park and into the Future Urbanizing Area).

Previously proposed "J" Street, also in the Black Mountain neighborhood, has been eliminated altogether. This provides for more open space, open space connections, and wildlife movement opportunities.

Camino Ruiz, in the Penasquitos Creek neighborhood, has been reclassified from a 4-lane collector to a 4-lane modified collector. This reclassification could lessen impacts on biology because the road can be designed to more closely follow the existing topography, and require less grading.

The November 1992 draft Rancho Penasquitos Community Plan contains environmental policies which have been revised and enhanced with new recommendations, including a recommendation that the disturbance of vernal pools, their associated native landforms, and contributing watersheds be prohibited. These revised policies could help to mitigate or avoid impacts on vernal pool habitat when discretionary development proposals are submitted to the City.

b) LANDFORM ALTERATION/VISUAL QUALITY:

Impact: Development according to the July 1991 community plan would result in significant visual and landform alteration where the natural topography would be replaced with manufactured slopes, streets, and urban structures. Millions of yards of earth would be moved to create cut and fill slopes.

Finding: The intensity of residential development that would occur in the November 1992 draft Rancho Penasquitos Community Plan would be lower than in the previously proposed draft plan. A 200-acre area on the eastern slopes of Black Mountain has been redesignated to permit a maximum density of approximately 150 dwelling units. Thus, there would be substantially less grading for the development of manufactured slopes, streets, and urban structures. In addition, the November 1992 community plan has been revised to minimize development on steep slopes in the Black Mountain neighborhood to retain prominent ridges and knolls (development will occur outside of the Hillside Review Overlay Zone).

As development proposals are processed by the Planning Department, the mitigation of impacts could occur through the refinement of grading plans during subsequent Planned Development Permit and/or Tentative Map review.

Impact: The proposed alignment of Camino Ruiz to the north of Los Penasquitos Canyon is a significant landform alteration/visual impact.

Finding: Travel forecasts have demonstrated a decline in the Level of Service (LOS) at the intersection of Park Village Road and Black Mountain Road if the proposed Camino Ruiz was eliminated. In addition, out-of-direction traffic would increase if the road were eliminated, resulting in adverse air quality impacts. Landform and visual impacts of the proposed Camino Ruiz north of Los Penasquitos Canyon have been minimized as much as possible by reclassifying the road from a 4-lane collector to a 4-lane modified collector in the November 1992 draft Rancho Penasquitos Community Plan. This reclassification will reduce impacts because the proposed road will more closely follow existing topography and require less grading than the previously proposed road.

c) AIR QUALITY:

Impact: Adoption of the July 1991 community plan would result in significant project-specific and incremental impacts on air quality in the San Diego Air Basin.

Finding: The number of dwelling units allowed in the November 1992 draft Rancho Penasquitos Community Plan has been reduced by 150 units. This will result in reduced traffic and lower impacts on air quality in the San Diego Air Basin.

2. ALTERNATIVES INCORPORATED INTO PROJECT

BLACK MOUNTAIN NEIGHBORHOOD ALTERNATIVES

a) Compacted development.

This alternative involves maintaining the permitted number of units but clustering development near existing development rather than spreading over the upper slopes of Black Mountain. This alternative would also reduce impacts to biological resources, visual quality, and landform alteration.

This alternative is feasible, and has been incorporated into the November 1992 draft community plan.

The acreage devoted to residentially designated land use has been scaled back in the Black Mountain neighborhood to encourage new development to be clustered near existing development. In addition, roads have been reclassified or eliminated to reduce impacts to biological resources, visual quality, and landform alteration.

b) Open Space Policies.

This alternative provides that language be included in the community plan which would encourage use of the lower-value habitat "islands" and thus, retain the higher habitat values of the "connected" open spaces. Enhancing people/pet access to the "islands" created by development would relieve the pressure to accommodate these uses in high quality habitat that would be preserved for wildlife. Adoption of this alterative would further mitigate impacts to biological resources.

This alternative is feasible, and has been incorporated into the November 1992 draft community plan.

Open space policies have been added to the November 1992 draft Rancho Penasquitos Community Plan in direct response to the recommendations of the above described alternative.

B. The City Council finds that there are no changes or alterations within the responsibility of another public agency which are necessary to avoid or substantially lessen significant environmental effects.

C. The City Council finds that specific economic, social or other considerations make infeasible the project alternatives identified in Final EIR 89-1222 to reduce the significant impacts on biology, landform alteration/visual quality, traffic, air quality, and land use.

1. BIOLOGY:

Impact: Development according to the July 1991 draft Rancho Penasquitos Community Plan would result in the direct loss of coastal sage scrub, fragmentation of habitat, the direct loss of vernal pools, and the potential disturbance of major wildlife movement corridors.

2. LANDFORM ALTERATION/VISUAL QUALITY:

Impact: As recommended in the July 1991 draft Rancho Penasquitos Community Plan, the Camino Ruiz right-of-way would be retained. A major significant visual impact would occur with the potential construction of Camino Ruiz, north of Los Penasquitos Canyon.

3. TRAFFIC:

Impact: While there would be no significant traffic impacts in Rancho Penasquitos, development according to the July 1991 draft Rancho Penasquitos Community Plan would result in significant impacts on traffic circulation in Mira Mesa. This is due to increased vehicular trips if the proposal to delete the Camino Ruiz alignment across Los Penasquitos Canyon is adopted. In addition, there would be a significant impact on the regional circulation system due to the elimination of the Camino Ruiz extension.

4. AIR QUALITY:

Impact: Significant incremental impacts would result due to the July 1991 draft Penasquitos Community Plan recommendation to retain the Camino Ruiz right-of-way but not construct the road. Air quality impacts would result from congestion in Mira Mesa if Camino Ruiz does not provide an additional north-south arterial to serve the region.

5. LAND USE:

Impact: Adoption of the July 1991 Rancho Penasquitos Community Plan would result in potentially significant impacts on land use if development proposals are adopted which are consistent with the community plan but are not consistent with the resource protection regulations.

Finding: Environmental Impact Report 89-1222 addresses nine project alternatives which reduce significant unmitigated impacts associated with the proposed Rancho Penasquitos Community Plan. The environmental benefits of each of these alternatives and the reason for their rejection are described below:

a) NO PROJECT ALTERNATIVE:

This alternative would result in the retention of the goals and recommendations of the adopted community plan.

This alternative is infeasible for the following reasons:

Under this alternative, biology, landform alteration/visual quality, traffic, air quality, and land use impacts could worsen, if development were to occur. In particular, more biological impacts would occur in the Black Mountain neighborhood because more land is designated for residential use in the adopted community plan, and more dwelling units are allowed. In addition, there would be more landform alteration/visual quality impacts in the Black Mountain neighborhood. Traffic and air quality impacts would be greater because more dwelling units would be built, generating more traffic. In terms of land use impacts associated with the requirements of the Resource Protection Ordinance, the impacts would be the same as those in the November 1992 Rancho Penasquitos Community Plan. The real "no project" *status quo*, would not

result in any impacts; however community plan goals would not be met.

In addition, public facility needs in the community would not be met under this alternative. While it is true that the 1987 interim community plan update amendment (R-268424) has addressed many public facility deficiencies in the community, the November 1992 community plan provides for additional public improvements.

The No Project Alternative is considered infeasible because of the various social and environmental benefits, outlined above, that would be realized with the adoption of the community plan update.

b) PUBLIC FACILITIES ALTERNATIVES:

1) Retention of the planned extension of Camino Ruiz across Los Penasquitos Canyon to Rancho Penasquitos.

This alternative would mitigate significant traffic and air quality impacts in Mira Mesa, but may result in significant impacts on biological resources and visual quality with bridge construction.

This alternative is infeasible for the following reasons:

This alternative is infeasible because the City Council has eliminated the canyon crossing with the adoption of the Mira Mesa Community Plan.

2) Retention of the Camino Ruiz right-of-way.

This alternative would achieve essentially the same goals as the prior alternative, but would delay the visual and biological impacts. In addition, it would delay the decision to construct the road until it was determined that resolution of traffic and air quality impacts outweigh potential visual and biological impacts.

This alternative is infeasible for the following reasons:

This alternative is infeasible because the City Council has eliminated the canyon crossing with the adoption of the Mira Mesa Community Plan.

3) Elimination of Camino Ruiz in the Penasquitos Creek Neighborhood.

This alternative would only be feasible if it is determined that Camino Ruiz will not be constructed as a through arterial. This alternative would eliminate a section of Camino Ruiz that may not be critical to circulation in the community. Adoption of the alternative would provide an opportunity to avoid loss of a critical wildlife corridor and sensitive coastal sage scrub habitat, as well as alleviating a potentially significant visual impact.

This alternative is infeasible for the following reasons:

Additional studies by the City's Engineering and Development Department have demonstrated the need to construct Camino Ruiz as a through arterial in the Penasquitos Creek Neighborhood to better move traffic. If Camino Ruiz were deleted from the community plan, the Level of Service (LOS) at the intersection of Black Mountain Road and Park Village Road would fall from a morning peak-hour LOS of C to D and an evening peak-hour LOS of D to E. In addition, it is anticipated that significant air quality deterioration would result because of increased out of direction travel to proposed Ted Williams Parkway (SR 56) and local commercial areas, and engine idling at intersections.

4) Elimination of the extension of Paseo Valdear in the Black Mountain Neighborhood.

This alternative would eliminate a section of Paseo Valdear which may not be critical to community circulation, but was planned to provide access to a designated residential area. The adoption of this alternative would result in major alleviation of significant visual impacts due to probable grading on the upper slopes of Black Mountain and the visual impact of a road across highly visible and steep terrain.

This alternative is feasible, and has been incorporated into the November 1992 draft community plan.

Paseo Valdear has been redesigned to satisfy only emergency vehicle requirements on a portion between two areas designated for residential use in the Black Mountain Neighborhood. Environmental impacts have been substantially reduced because of these changes.

c) NO INDUSTRIAL ELEMENT ALTERNATIVE:

This alternative proposes eliminating the Industrial Element from the community plan, and locating the parking/storage facilities in the industrially-zoned area of the neighboring Sabre Springs community.

This alternative is infeasible for the following reasons:

Industrial land in Sabre Springs costs more than the industrially designated land in Rancho Penasquitos because the parcels are planned and improved to accommodate high quality industrial park development. In addition, many of the parcels have already been developed with speculative industrial and business park buildings, increasing the cost of the remaining industrial land. By contrast, the land identified in the Industrial Element of the November 1992 draft Rancho Penasquitos Community Plan is undeveloped and unimproved. The site is zoned R1-6000 and has little development potential because of an existing open space easement. The land will be made available at no cost by the owner to develop these facilities. These factors make the Rancho Penasquitos parcel much less costly to develop.

Due to the low economic return associated with recreational vehicle (RV) storage facilities, it is economically infeasible to develop an RV storage facility in the higher cost industrial parks of Sabre Springs.

d) BLACK MOUNTAIN NEIGHBORHOOD ALTERNATIVES:

1) Very low density (A-1-10 Zone).

This alternative involves reducing densities over the entire remaining portion of the area by retaining the existing zoning. Existing zoning according to this alternative would be one dwelling unit per ten acres with guidelines for landform-sensitive development. This alternative would reduce impacts to biological resources, visual quality, and landform alteration.

This alternative is infeasible for the following reasons:

Under this alternative fewer facilities impact fees would be collected, translating into less available money to finance new public improvements. In addition, this alternative would still necessitate costly roads to provide access to the very low density development.

STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE (NOVEMBER 1992) RANCHO PENASQUITOS COMMUNITY PLAN

DEP No. 89-1222
November, 1992

The City Council, pursuant to the CEQA Guidelines, after balancing the benefits of the proposed Rancho Penasquitos Community Plan against unavoidable significant impacts of the project on biology, landform alteration/visual quality, traffic, air quality, and land use, determines that the impacts are acceptable for the following overriding considerations:

1. The development that would occur as a result of implementing the Rancho Penasquitos Community Plan, as proposed, would be less intensive than that which would occur under the existing plan. Additional acreage has been designated for open space, and land use designations have been reconfigured to provide for more connections between open space areas.

2. The plan update provides new policies to more effectively manage sensitive biological resources in the community.

3. Roads recommended for construction in the Penasquitos East Community Plan have been deleted or reclassified to preserve open space areas in the community plan update. For example, the deletion of the Camino Ruiz crossing will preserve the aesthetic and environmental integrity of a significant, publicly-owned, regional open space park, and will avoid the substantial impacts that would result from the construction of the roadway.

4. The land use proposals within the community plan update ensure the development of a balanced community. During the initial phases of the community planning effort, local residents expressed a desire for additional public facilities, commercial areas, and larger homes. These desires have been addressed during the community plan update process and are reflected as policy in the proposed Rancho Penasquitos Community Plan.

5. Existing conditions data has been updated to reflect the latest information regarding plan build-out and progress in completing public facilities.