



THE CITY OF SAN DIEGO

SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Project No. 417090
SCH No. 1993121032

SUBJECT: USD MASTER PLAN UPDATE: The project requests a CONDITIONAL USE PERMIT (CUP), SITE DEVELOPMENT PERMIT (SDP) and EASEMENT VACATION to amend CUP/Resource Protection Ordinance (RPO) Permit No. 92-0568, CUP No. 40-0419, CUP No. 10325 and CUP No. 489856 to accommodate an increase in enrollment from 7,000 full-time equivalent students (FTE) to 10,000 FTE students over the next 15 to 20 years. Specifically, the project would update the Design Guidelines that provide a design framework for campus development and construct 14 individual projects for academic and administrative buildings, student housing, athletics and recreation amenities, parking, pedestrian circulation, and landscape improvements. Further, City water facilities and one City storm drain easement would be vacated. Deviations from applicable regulations to height and floor area ratio are also being requested. The project would conform to the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program by meeting the U.S. Green Building Council Leadership in Energy and Building Design (LEED) Silver (or equivalent) requirement. The approximate 180-acre project site is located at 5998 Alcala Park. The parcel is designated Institution within the Linda Vista Community Plan. The site is within the OR-1-1, RS-1-7, RM-1-1, RM-3-7, and CC-4-2 Zones. The majority of the project site is located within the Residential Zones (RS-1-7, RM-1-1, and RM-3-7) with small areas zoned Open Space (OR-1-1 and OP-2-1) and Commercial (CC-4-2, CC-4-5, and CC-5-4). Additionally, the project site is within the Community Plan Implementation Overlay Zone CPIOZ (Type A), the Parking Impact Overlay Zone (Campus Impact Area), the Airport Influence Area for San Diego International Airport and Montgomery Field (Review Area 2), the Airport Land Use Compatibility Overlay Zone, and the Federal Aviation Administration (FAA) Part 77 Noticing Area. (**LEGAL DESCRIPTION:** Assessor Parcel Number (APN) 436-280-1300; 436-280-02; 436-280-09; 436-280-10; 436-280-13; 436-320-01; 436-330-04; 436-330-05; 436-330-24 (portion); 436-330-25 (portion); 436-340-03; 436-340-02; 436-370-19; 436-390-02 to 08; 436-390-11; 436-390-19; 436-390-20; 437-010-06; 437-010-19; 437-010-22; 437-010-21; 437-640-27; 437-640-28; and 437-640-33). Applicant: Ky Snyder, University of San Diego.

UPDATE: May 12, 2017. Revisions and/or minor corrections have been made to this document when compared to the draft Subsequent Environmental Impact Report. More specifically, typographical errors and clarifications were made to the final environmental document. In accordance with the California Environmental Quality Act, Section 15088.5(b), the addition of new information

that clarifies, amplifies, or makes insignificant modifications does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is the identification of new significant environmental impacts or the addition of a new mitigation measure required to avoid a significant environmental impact. The modifications within the environmental document do not affect the environmental analysis or conclusions of the Subsequent Environmental Impact Report. All revisions are shown in a strikethrough and/or underline format.

ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department and is based on the City's independent analysis and conclusions made pursuant to 21082.1 of the California Environmental Quality Act (CEQA) Statutes and Sections 128.0103(a), 128.0103(b) of the San Diego Land Development Code.

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Subsequent Environmental Impact Report (SEIR). The analysis conducted identified that the project could result in significant impacts to the following issue area(s): Land Use, Transportation/Circulation, Biological Resources, Historical Resources, Air Quality, Public Utilities, and Visual Effects and Neighborhood Character; Cumulative (Transportation/Circulation and Air Quality).

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

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft SEIR and were invited to comment on its accuracy and sufficiency. Copies of the SEIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

FEDERAL GOVERNMENT

U.S. Fish and Wildlife Service (23)

STATE OF CALIFORNIA

Caltrans District 11 (31)

California Department of Fish and Wildlife (32)

State Clearinghouse (46A)

California Department of Transportation (51)

California Transportation Commission (51A)

California Transportation Commission (51B)

California Native American Heritage Commission (222)

CITY OF SAN DIEGO

Mayor's Office (91)

Councilmember Bry, District 1 (MS 10A)

Councilmember Zapf, District 2 (MS 10A)

Councilmember Ward, District 3 (MS 10A)

Councilmember Cole, District 4 (MS 10A)

Councilmember Kersey, District 5 (MS 10A)

Councilmember Cate, District 6 (MS 10A)

Councilmember Sherman, District 7 (MS 10A)

Councilmember Alvarez, District 8 (MS 10A)

Councilmember Gomez, District 9 (MS 10A)

Development Services Department

EAS – L. Sebastian

Fire – Plan Review – B. Sylvester

Engineering – J. Tamares

Geology – J. Quinn

Landscaping – D. Neri

Planning Review – G. Geiler

Transportation – E. Alberto

PUD – Water & Sewer Development – M. Keshavarzi

Project Manager – J. Fisher

Planning Department

Park & Recreation – C. Hooker

Plan - Facilities Financing – B. Hafertepe

Plan - Historic – J. Brown

Plan – Long Range Planning – N. Siodmok

Plan - MSCP – H. Smit-Kicklighter

Transportation Development - DSD (78)

Development Coordination (78A)

Fire and Life Safety Services (79)

Library Department - Government Documents (81)

Central Library (81A)

Linda Vista Branch Library (81M)

Mission Valley Branch Library (81R)

Mehdi Rastakhiz, Water Review (86A)

Leonard Wilson, Wastewater Review (86B)

Historical Resources Board (87)

Tom Tomlinson, Facilities Financing (93B)

Lisa Wood, Environmental Services Department (MS1102-A)

Joshua Odom, San Diego Police Department (MS776)

Larry Trame, San Diego Fire-Rescue (MS603)

City Attorney (93C)

OTHER ORGANIZATIONS AND INTERESTED INDIVIDUALS

San Diego Association of Governments (108)
San Diego County Regional Airport Authority (110)
San Diego Transit Corporation (112)
Metropolitan Transit Systems (115)
Sierra Club (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
San Diego Audubon Society, Mr. Jim Peugh (167A)
California Native Plant Society (170)
Citizens Coordinate for Century 3 (179)
Endangered Habitats League (182)
Endangered Habitats League (182A)
San Diego Tracking Team (187)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown – Inter-Tribal Cultural Resources Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution [Notice Only] (225A-S)
Linda Vista Planning Group (267)
Marian Bear Rec. Council (267A)
San Diego Mesa College (268)
University of San Diego (269)
Friars Village HOA (270)
Mission Valley Planning Group (331)
Ky Snyder, Applicant
Kim Baranek, Baranek Consulting
Mr. David Oddo
Mr. Eric Burger
Mr. Howard Wayne
Mrs. Mary Londberg
Mr. Mike Baker
Rincon Band of Luiseno Indians
Ms. Beverly Blessent
Ms. Virginia LaGuardia

RESULTS OF PUBLIC REVIEW:

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



Kerry M. Santoro
Deputy Director
Development Services Department

January 6, 2017

Date of Draft Report

May 12, 2017

Date of Final Report

Analyst: L. Sebastian



RESPONSES TO COMMENTS



**USD Master Plan Update
Subsequent Environmental Impact Report
Letters of Comment and Responses**

Letters of comment to the Draft Subsequent Environmental Impact Report (SEIR) were received from the following agencies, organizations and individuals (Table 1). Several comment letters received during the Draft SEIR public review period contained requests for revisions that resulted in minor changes to the Draft SEIR text. These changes to the text are indicated by ~~strikeout~~ (deleted) and underline (inserted) markings. Many comments do not pertain to the adequacy of analysis in the Draft SEIR or to other aspects pertinent to the potential effects of the proposed University of San Diego (USD) Master Plan Update on the environment pursuant to CEQA. Often, these comments refer to aspects of the Master Plan Update. Responses are provided to these comments. However, it is noted here for the public record that such comments are not in the purview of the Draft SEIR or the California Environmental Quality Act (CEQA).

Each comment letter is reproduced alongside the corresponding responses to individual comments.

**Table 1
List of Commenting Agencies and Organizations**

Letter	Commenter	Page
Federal and State Agencies		
A	State of California Governor's Office of Planning and Research, State Clearinghouse Unit (State Clearinghouse; February 22, 2017)	RTC-1
B	State Clearinghouse (February 24, 2017)	RTC-3
C	California Department of Fish and Wildlife	RTC-4
D	California Department of Transportation	RTC-9
Organizations		
E	San Diego Association of Governments	RTC-11
F	Save Our Heritage Organization	RTC-14
G	San Diego County Archaeological Society	RTC-15
H	Rincon Band of Luiseño Indians	RTC-16
Individuals		
I	Beverly Blessent	RTC-17
J	Virginia LaGuardia	RTC-22

COMMENTS

RESPONSES



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

February 22, 2017

Lindsey H. Sebastian
City of San Diego
1222 First Ave, MS 501
San Diego, CA 92101

Subject: USD Master Plan Update
SCH#: 1993121032

Dear Lindsey H. Sebastian:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 21, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1 Comment noted. See response to comments C-1 to C-10, below.

COMMENTS

RESPONSES

**Document Details Report
State Clearinghouse Data Base**

SCH# 1993121032
Project Title USD Master Plan Update
Lead Agency San Diego, City of

Type SIR Supplemental EIR
Description The project requests a CUP, site development permit and easement vacation to amend CUP/Resource Protection Ordinance Permit No. 92-0568, CUP No. 40-0419, students to 10,000 FTE students over the next 15-20 years.

Lead Agency Contact

Name Lindsey H. Sebastian
Agency City of San Diego
Phone 619-238-5993 **Fax**
email
Address 1222 First Ave, MS 501
City San Diego **State** CA **Zip** 92101

Project Location

County SAN DIEGO
City LINDA VISTA
Region
Lat / Long 32.77435051° N / -117.1836616° W
Cross Streets Linda Vista Rd, and Marian Way and Alcalá Parkway
Parcel No. 436-280-1300
Township **Range** **Section** **Base**

Proximity to:

Highways I-5
Airports
Railways
Waterways
Schools USD
Land Use Institution/OR-1-1, RS-1-7, RM-1-1, RM-3-7, CC-4-2 Zones/institutional & public and semi-public facilities

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Sewer Capacity; Solid Waste; Traffic/Circulation; Vegetation; Water Quality; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; San Diego River Conservancy

Date Received 01/06/2017 **Start of Review** 01/09/2017 **End of Review** 02/21/2017

COMMENTS

RESPONSES



EDMUND G. BROWN JR.
GOVERNOR

February 24, 2017

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



KEN ALEX
DIRECTOR

Lindsey H. Sebastian
City of San Diego
1222 First Ave, MS 501
San Diego, CA 92101

Subject: USD Master Plan Update
SCH#: 1993121032

Dear Lindsey H. Sebastian:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 21, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

B-1 Comment noted. See response to comments D-1 to D-4, below.

COMMENTS

RESPONSES



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



Ms. Lindsey H. Sebastian, Environmental Planner
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sandiego.gov

Subject: Comments on the University of San Diego Master Plan Update, City of San Diego, San Diego County, California (Project Number 417090, SCH # 1993121032)

Dear Ms. Sebastian:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the University of San Diego (USD) Master Plan Update (Proposed Project) dated January 2017. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1800 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan.

The Proposed Project includes an update to the existing Master Plan and conceptually identifies 14 newly proposed projects which would allow for the construction of academic/administrative buildings, student housing, student services, athletics/athletic support/administrative buildings, parking, pedestrian circulation, and landscape improvements not contemplated in the 1996 Master Plan and related Final Environmental Impact Report (FEIR). USD received approval of its existing Master Plan, including Design Guidelines, in 1996 to guide the phased buildout of the campus through the year 2030. Concurrent with the City's approval of the 1996 Master Plan, Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) Permit Number 92-0568 was issued to allow the campus to construct on 23 projects outlined in the 1996 Master Plan. In conjunction with the Master Plan approval, the City certified the 1996 Master Plan FEIR (SCH No. 93121032), including its associated technical studies. Subsequently, USD is proposing a Master Plan Update (MPU) of the original 1996 Master Plan.

Discretionary actions for the MPU include: a new CUP to replace and amend the existing permit (as currently amended) to allow for the continued institutional use within the residential zone, and a Site Development Permit that would allow the campus to impact Environmentally Sensitive Lands, specifically sensitive biological resources and steep slopes. Some public utility easements would be vacated and others would be dedicated as part of the new CUP, which would be processed separately as part of future project applications under the MPU. The current USD campus is largely developed; Tecolote Canyon Natural Park forms the northern border of the campus and includes lands designated as Multiple Habitat Planning Area (MHPA).

Conserving California's Wildlife Since 1870

C-1 The statements regarding the role of the CDFW and its review of the Draft SEIR are acknowledged; no response necessary.

C-2 Comment summarizes information contained in the Draft SEIR; no response necessary.

COMMENTS

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Ms. Lindsey H. Sebastian, Environmental Planner
City of San Diego
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The Department offers the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

1. According to the Biological Technical Report (Helix, 2016) "[o]n August 15, 2014, HELIX Principal Biologist W. Larry Sward conducted vegetation community/land cover type mapping and a general biological survey for the proposed MPU." Biological surveys should be updated for the MPU, and as appropriate, for subsequent project review; per the City MSCP City Biology Guidelines (A)(1) "[b]iological surveys that are over 24-months would require that the survey and report be updated to reflect the most current conditions affecting the project site."

2. The Department considers the focused vegetative surveys to be inconclusive based on the weather conditions at the time of the surveys. Additionally, the surveys should be updated prior to being utilized for site-specific project approvals. Page 4 of the Biological Technical Report states "[a] sensitive plant survey was conducted by Mr. Sward on May 22, 2015, which is during the period when most annual plant species are blooming." The Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (Native Plant Survey Protocols) highlight the need for multiple, recent site visits, particularly during periods of drought:

"Adverse conditions may prevent investigators from determining the presence of, or accurately identifying, some species in potential habitat of target species. Disease, drought, predation, or herbivory may preclude the presence or identification of target species in any given year. Discuss such conditions in the report."

"The failure to locate a known special status plant occurrence during one field season does not constitute evidence that this plant occurrence no longer exists at this location, particularly if adverse conditions are present. For example, surveys over a number of years may be necessary if the species is an annual plant having a persistent, long-lived seed bank and is known not to germinate every year." (GDFW, 2009)

In accordance with the DEIR, general biological surveys were completed on August 14, 2014 and sensitive plant surveys were completed on May 22, 2015 (Helix, 2016). Figure 4—Vegetation and Sensitive Resources/Impacts, documents multiple locations of sensitive species within the Proposed Project MPU including California gnatcatcher (*Polioptila californica*, a federally threatened species), loggerhead shrike (*Lanius ludovicianus*, a state species of special concern), Cooper's hawk (*Accipiter cooperii*, a MSCP covered species and raptor species protected by Fish and Game Code §3503.5), California Adolphia (*Adolphia californica*, a California Native Plant Society 2B,1 listed species), and San Diego barrel cactus (*Ferocactus viridescens*) are documented within the Proposed Project. In addition to the Department's Native Plant Survey Protocols, the City's Biology Guidelines state that "[s]urveys, for state and federally listed sensitive or MSCP-covered species older than 24 months must be updated..." (City, 2012). The entirety of the Proposed Project site should be surveyed prior to any discretionary action "[s]ince the 2015 [rare plant] surveys did not cover the entire MPU [Proposed Project]..." (Biological Technical Report). Additionally, given the proximity of the Proposed Project site to MHPA—specifically, Tecolote Canyon Natural Park—any discretionary action should document its conformance to City Land Use Adjacency Guidelines including prescribed buffers, and mitigation in conformance with section 1.4.3 and implementation in conformance with section 1.5.

C-3 In accordance with the City's Biology Guidelines, an updated survey was conducted in March 2017 to ascertain if any changes to site conditions and resources had occurred since the 2014/2015 surveys. A memo was prepared to document the observations made during the survey update; the memo is contained in Appendix D and is referenced in the Final SEIR. The timing of the updated survey, following a particularly wet winter, confirms the determination that sensitive plant species are not present on site. Their absence from the site could not be attributed to adverse drought conditions. As noted in the Final SEIR, the conditions within the project impact areas represented in the Draft SEIR remain unchanged. Therefore, the impacts presented in the Draft SEIR would not change.

C-4 During the updated survey conducted in March 2017 (referred to in Section 5.3, *Biological Resources*) noted above in response to comment C-3, the project biologist reviewed the list of previously observed species and potential to occur species and conducted a field visit to determine if any of the sensitive plant species that have been observe or could occur on the USD property exist within the areas proposed to be impacted by the Master Plan Update. The focus of the survey was on the four project sites that would have impacts on biologically sensitive habitats, including Project Site Nos. 17, 19, 22 and 23 (refer to Figure 5.3-1 in the Draft SEIR). The updated field survey determined that no sensitive plant species exist within Project Site Nos. 17, 19, 22 and 23. This conclusion is consistent with the analysis contained in Section 5.3, *Biological Resources*, of the Draft SEIR. All other project sites proposed in the Master Plan Update would involve redevelopment of urbanized areas of the USD campus with landscape comprised of non-native species. All undeveloped areas of campus containing sensitive biological resources and/or steep slopes that would remain after project implementation would be placed in a Covenant of Easement (COE), as required by the ESL Regulations. Any resources within the COE would be preserved in place and avoided by the Project. With overall project implementation, no sensitive plant species would be impacted.

C-5 Conformance with the MSCP Subarea Plan's Land Use Adjacency Guidelines (1.4.3) and Framework Management Plan (1.5) is addressed on pages 5.1-15 through 5.1-19 in Section 5.1, Land Use, of the SEIR. Of the 14 projects under the Master Plan Update, only two sites (i.e., Project Site Nos. 20 and 27) are directly adjacent to the MHPA, while Project

COMMENTS

RESPONSES

Ms. Lindsey H. Sebastian, Environmental Planner
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C-6 3. The Department recommends that the body of the DEIR include the full text of and accompanying analysis of the CUP and RPO permit number 92-0568 as it relates to the deed restriction associated with two areas (one 2.6-acre area and one 2.3-acre area) described in the Biological Technical Report (p. 5). The Department also requests that the City clarify the Biological Technical Report's assertion that "these areas [the deed-restricted areas] were established by the City as part of the 1996 Master Plan approvals but were not specifically set aside as mitigation for any impacts to biological resources." According to the Declaration of Restrictions (City 1997) included in the biological resources report, "WHEREAS, as a condition of approval [emphasis added] for CUP/RPO Permit No. 92-0568, Declarant was required [emphasis added] to protect and preserve certain sensitive biological and hillside resources of the Property not being impacted by the development proposals contained in CUP/RPO Permit No. 92-0568..." suggesting that contrary to what the Biological Technical Report describes, the Declaration of Restrictions are in fact mitigation for the prior Master Plan and associated CUP/RPO permit number 92-0568. Additionally, the CUP/RPO number 92-0568 was approved in 1996, when the Coastal Sage Scrub Process Guidelines (CDFG 1993) were in effect but prior to the issuance of the City's NCCP/HCP permits. At that time, and following approval of the MSCP by the Wildlife Agencies, impacts to coastal sage scrub would have been required to be mitigated by conserving lands or purchasing of appropriate credits from conservation banks. Subsequently, the Declaration of Restrictions (San Diego County Recorder's Office document number 1997-0634035) was recorded to fulfill the conservation of sensitive biological and hillside resources required by CUP/RPO No. 92-0568. Absent the DEIR providing the exact language of the relevant sections of the CUP/RPO permit, neither the Department nor the reviewing public is able to evaluate the accuracy of the Biological Technical Report's assertion that the deed-restricted areas do not serve as biological mitigation. Furthermore, if in fact the deed-restricted areas were set aside "...as a condition of approval of the 1996 CUP/RPO Permit..." (Biological Technical Report) it is unlikely that a condition of approval (e.g., mitigation measure) can be appropriately altered without first identifying and mitigating impacts to a prior mitigation site. Should it be determined that a prior mitigation site will be impacted as a result of the MPU, mitigation for the original project in addition to mitigation for impacts associated with projects approved pursuant to the MPU should be provided.

C-7 Similarly, the DEIR states that "...USD specifically reserves the right to seek City Council approval of amendments to modify the scope of or the permitted uses in these [sensitive biological] areas." Our review of the Declarations of Restrictions (provided within the Biological Technical Report) suggests that a mechanism exists to amend the sensitive biological areas required to be protected by CUP/RPO Permit number 92-0568; however, it does not speak to the requisite mitigation needed to authorize impacting a former mitigation site.

C-8 Projects subsequently approved to this MPU (e.g., Project Site Numbers 17-30) or other subsequent approvals (ministerial or discretionary) should document the potential impacts to biological resources and their respective mitigation measures via subsequent CEQA documents relying on the MPU. The DEIR states the "...CUP [Conditional Use Permit] provides that the university may submit project plans to City staff for 'Substantial Conformance Review' (SCR) in order to make a determination whether the project meets the CUP requirements." However, the DEIR does not analyze the potential site-specific biological impacts associated with any of the subsequent Project Site Numbers nor are site-

C-5 cont. Site Nos. 21, 24 and 28 occur within 500 feet of the MHPA (refer to Figure 5.3-1 in the FEIR for their precise locations relative to the MHPA). Conformance with the Land Use Adjacency Guidelines will be made a condition of approval to assure the impacts are avoided.

C-6 The Deed Restriction referenced in this comment was recorded on the USD campus as part of the 1996 Master Plan entitlements (CUP/RPO No. 92-0568) and was a regulatory compliance measure under the City's Resource Protection Ordinance (RPO). As noted in the 1996 FEIR, the RPO was a City regulation aimed at protecting steep slopes and sensitive biological resources similar to the current Environmentally Sensitive Lands (ESL) Regulations in place today. The RPO has subsequently been replaced by the ESL Regulations.

In the 1996 FEIR, the Deed Restriction was not required by the City as biological mitigation to compensate for direct impacts to maritime succulent scrub, Diegan coastal sage scrub, and the coastal California gnatcatcher identified in the 1996 FEIR. Mitigation for direct impacts to those resources was prescribed in Mitigation Measure IV.D.1 and required monetary contribution to the Habitat Acquisition Fund for those impacts (see page IV.D-16 of the 1996 FEIR). Instead, the Deed Restriction was required as a permit condition because the 1996 Master Plan would encroach into more than the permitted amount of hillsides and biologically sensitive lands on campus, as defined by the RPO and described in the Land Use analysis contained on pages IV.J-22 through 24 of the 1996 FEIR.

The Deed Restriction can be rescinded and rerecorded if an amendment to the current CUP/RPO permit is proposed which amends the permitted uses within the Deed Restricted areas (refer to Appendix D to this SEIR for the exact language), as noted in the Land Use section of the Final SEIR. The only improvement proposed within the existing deed restricted areas of the campus is Project Site No. 19, a pedestrian pathway and bridge over Marian Way proposed to improve accessibility between the West Campus Parking Structure and the campus mesa. The other 13 projects would avoid encroaching into the deed restricted areas.

Similar to the 1996 Deed Restriction, protection of the undeveloped portions of campus during implementation of the proposed Master Plan Update would be accomplished through the recordation of a Covenant of Easement (COE) as part of new approvals to protect remaining ESL, including steep slopes and biologically sensitive habitat. As part of the Project, the Deed Restriction will be rescinded and rerecorded as a COE.

C-7 As noted in this comment, modification of the Deed Restriction is permitted through City Council action. However, as explained in response to comment C-6, the Deed Restricted areas were not established

COMMENTS

RESPONSES

Ms. Lindsey H. Sebastian, Environmental Planner
City of San Diego
February 21, 2017
Page 4 of 5

specific mitigation measures developed for any of the Project Site Numbers. Absent the inclusion of site-specific analysis and corresponding mitigation measures, any project with the potential to directly or indirectly impact biological resources should not rely on a SCR to address those resources peculiar to the site.

4. The DEIR identifies the potential to impact stream resources which may fall under the purview of the Department, or City Environmentally Sensitive Lands Regulations. In conformance with City Land Development Code section 143.0510(d), impacts to wetlands require an Environmentally Sensitive Lands Wetland Deviation. In accordance with San Diego Municipal Code section 143.0115(b)(3) "[a]ny deviations proposed, other than as permitted in Section 143.0115(b)(4), are subject to Section 143.0150." Discretionary actions related to the MPU or subsequent projects should conform to Section 143.0150 of the San Diego Land Development Code.
- The Department has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. The Department, as a Responsible Agency under CEQA, may consider the lead agency's Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

We appreciate the opportunity to comment on the DEIR. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858) 467-4289 or Eric.Weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

cc: State Clearinghouse, Sacramento
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad

C-7 cont. as mitigation sites but rather set aside by way of a permit condition as required by the RPO. Mitigation for the current project's impacts to 0.50 acre of sensitive biological resources is outlined in Bio-2 of the SEIR, which requires payment into the City's Habitat Acquisition Fund similar to the 1996 FEIR.

C-8 Site-specific biological impacts associated with the various projects are presented by project site number in Table 5.3-4 of the SEIR, and the mitigation that is listed in the SEIR adequately compensates for those impacts, consistent with the City Biology Guidelines. Where clarification is needed to identify which specific Project Site(s) a measure would apply to, it was provided in the text of the mitigation. For example, in Bio-3, Nesting Cooper's Hawks, the measure states, "If removal of habitat within 300 feet of the MHPA (Projects No. 20, 21, 24, 27, and 28) must occur during the breeding season." Therefore, SCR is the appropriate mechanism for evaluating projects outlined in the Master Plan Update.

C-9 The 1996 FEIR assessed direct impacts to southern willow riparian scrub associated with the 1996 Master Plan. Implementation of the 14 additional projects under the Master Plan Update, however, would not directly impact any Waters of the U.S., Waters of the State, or City Wetlands (as stated on page 5.3-42 of the SEIR). These areas would be left in undeveloped land on campus and protected in place under the Covenant of Easement (COE) discussed above under response to comment C-6. Therefore, no wetland deviations would be required for the Site Development Permit.

C-10 As stated in response to comment C-9, there would be no impacts to Waters of the State with implementation of the Master Plan Update. No wetland permits would, therefore, be required to implement the Project.

COMMENTS

RESPONSES

Ms. Lindsey H. Sebastian, Environmental Planner
City of San Diego
February 21, 2017
Page 5 of 5

References

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HELIX Environmental Planning, Inc., 2016. University of San Diego Master Plan Update and Conditional Use Permit Amendment Biological Technical Report. December, 2016

COMMENTS

RESPONSES

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX (619) 688-4299
TTY 711



Serious drought.
Help save water!

February 23, 2017

11-SD-5, 8, 163
PM VAR
USD Master Plan Update
DSEIR / SCH#1993121032

Ms. Lindsey H. Sebastian
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Sebastian:

The California Department of Transportation (Caltrans) received a copy of the Draft Subsequent Environmental Impact Report (DSEIR) for the proposed USD Master Plan Update located near I-8, I-5 and SR-163. Caltrans has the following comments:

1. Table 9-1 of the DSEIR incorrectly states that the SR-163/Friars Rd Interchange Project - Phase I is expected to open to traffic in 2018. The updated date is 2020.
2. Comparing the Peak hour intersection analysis worksheets included in the DSEIR as appendices E, F, & G, the delay for the Off-ramp at intersection #3, I-5 NB Ramps & Sea World Dr./Tecolote Rd., increased (17 seconds) between the Existing plus Cumulative AM and the Existing plus Cumulative plus Project AM. With an increase in delay, the queue length of the ramp may be reaching or going beyond the ramp storage capacity, creating potential operational issues. Please submit output sheets showing the 95th percent queue length or the electronic SYNCHRO files to review.
3. We support the Morena Boulevard Station Area Planning Study and the Morena Corridor Specific Plan, including potential fair-share for projects included in the study and/or plan, and specifically within the Caltrans right-of-way (R/W). One potential project to consider is the Caltrans pedestrian project that is proposed at I-8/Morena Boulevard.
4. Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

- D-1 Table 9-1 referenced in this comment is contained in the Transportation Impact Analysis in SEIR Appendix C. The City acknowledges that the schedule for Phase 1 of the SR-163/Friars Road Interchange Project has been updated. The delay in the interchange project's timing does not affect the conclusions reached in the Draft SEIR.
- D-2 Table 5.2-8 in the SEIR and Table 8-1 of the Transportation Impact Analysis (SEIR Appendix C) show that the addition of project traffic to the Sea World Dr/I-5 Northbound (NB) ramps (Intersection #3 in both tables) would increase the overall average intersection delay by 1.3 seconds in the AM peak hour and 0.8 seconds during the PM peak hour. These very small delay increases would not significantly increase queue lengths on the ramp and do not trigger the City's significance determination thresholds listed in Table 5.2-5 of the SEIR. The standard of practice in the City is to report overall intersection delay and not specific movement delay. The traffic signal controller is actuated such that additional green time can be given to a specific movement that is experiencing a high influx in traffic during a specific signal cycle. The electronic Synchro files requested in this comment were sent to Caltrans staff under separate cover on March 1, 2017.
- D-3 Comment noted; however, the project would not have impacts to any state facilities (i.e., freeway segments, intersections or ramp meters). The fair-share payment outlined in Mitigation Measures Tra-2 and Tra-5 would

COMMENTS

RESPONSES

Ms. Lindsey H. Sebastian
February 23, 2017
Page 2

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to kimberly.dodson@dot.ca.gov.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

D-3 fund improvements to a local intersection and road segment impacted by
cont. the project.

D-4 Comment noted; an encroachment permit is not anticipated for the
project.



401 B Street, Suite 200
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

February 21, 2017

File Number 3300300

Ms. Lindsey Sebastian
City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Sebastian:

SUBJECT: University of San Diego Master Plan Update Draft Subsequent Environmental Impact Report (Project No. 417090)

Thank you for the opportunity to comment on the University of San Diego (USD) Master Plan Update Draft Subsequent Environmental Impact Report (SEIR). The San Diego Association of Governments (SANDAG) recognizes the important role that USD plays in the San Diego region as an educational institution and employer. Further, SANDAG appreciates efforts to implement policies included in San Diego Forward: The Regional Plan (Regional Plan) that help provide people with more travel and housing choices, protect the environment, create healthy communities, stimulate economic growth, and reduce greenhouse gas emissions. SANDAG's comments are based on policies included in the Regional Plan and are submitted from a regional perspective.

Smart Growth

SANDAG appreciates that the City of San Diego supports the goals of the Regional Plan and Smart Growth Concept Map through transit-oriented development and land use changes. A key goal of the Regional Plan is to focus growth in smart growth opportunity areas. The project is located within an Existing/Planned Special Use Center identified on the Smart Growth Concept Map (SD-LV 3). The project is adjacent to a high-frequency peak period local bus (Route 44), and a planned Rapid service will be phased in by 2035. Facilitating access to these nearby transit services will help to reduce greenhouse gas emissions associated with individual car trips, especially for students who live on campus or nearby.

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E-1 Comment noted.

E-2 Comment noted; the campus operates an off-campus shuttle system that serves the Old Town Trolley station. Bus Route 44 is noted on page 5.2-8 of the SEIR. To enhance access to regional transit, USD is proposing the off-campus installation of a bus stop pad along Linda Vista Road between Josephine and Brunner Streets as part of development at Project Site No. 23. In addition to encouraging the use of existing alternative transportation methods, transportation demand measures are proposed by USD to expand/enhance opportunities, including the issuance of discounted bus/trolley passes for students.

COMMENTS

RESPONSES

State Congestion Management Plan

In October 2009, the San Diego region elected to be exempt from the State Congestion Management Plan (CMP) and, since this decision, SANDAG has been abiding by 23 Code of Federal Regulations §450.320 to ensure the region's continued compliance with the federal congestion management process. SANDAG's current CMP, featured in the most recent Regional Plan (approved October 2015) does not include the large project provision that is defined as "generating, upon its completion, an equivalent of 2,400 or more average daily vehicle trips." Please see the City of San Diego's most recent Traffic Impact Study guidelines for current threshold guidance.

On page 5.2-11 of the Draft SEIR, please correct the reference to the "Congestion Management Program" to read as the "Congestion Management Plan".

Regional Transit

While the Draft SEIR discusses impacts and improvements to the USD campus, SANDAG encourages the City to consider access to improvements to regional transit routes within proximity to the campus. SANDAG encourages the City to consider including wayfinding and signage on campus to notify pedestrians of nearby transit services, such as the Morena/Linda Vista Green Line trolley station and the Old Town Transit Center, as well as the proposed Mid-Coast Corridor Blue Line trolley station at Tecolote Road.

Transportation Demand Management

In addition to the parking and transportation demand management (TDM) strategies identified in the SEIR, please consider enhancing outreach and promotion of these strategies to support shared mobility initiatives and future multimodal investments identified in USD's Master Plan Update. Additional TDM strategies to consider implementing include:

- Enhancement of bicycle and pedestrian facilities that facilitate connectivity to commercial areas, bikeways, and available transit services around the campus.
- Where feasible, provision of shared curb space to facilitate on-demand rideshare service pick-up and drop-off.
- Installation of transportation kiosks throughout major campus spaces that provide real-time information about regional transit services, bicycling, carshare, rideshare, and other transportation services.
- Wayfinding signage to transit and other multi-modal travel options, in addition to major campus destinations.

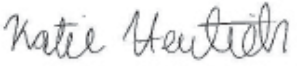
E-3 Section 5.2 has been revised in the Final SEIR to correct the reference to the Congestion Management Plan, as suggested in this comment.

E-4 The campus would consider expanded shuttles/trams to the new Morena/Linda Vista trolley station in the future, as noted in Section 5.2, Transportation/Circulation, of the Final SEIR. Enhanced signage related to regional transit offerings is also proposed; maps and mobile applications would also be used to disseminate regional transit information to the campus population.

E-5 Comment noted. Many of the TDMs recommended in this comment are contained in Section 4.4 of the Master Plan Update, and are identified in Section 5.2.3 of the SEIR. The campus would take into consideration the additional TDMs suggested in this comment as they monitor the effectiveness of their TDM program, as required by the CUP.

COMMENTS

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E-6	<p>Additionally, continue partnering with iCommute to promote participation in regional TDM programs and services including the Regional Vanpool Program, ridematching services, and the Guaranteed Ride Home Program. The iCommute Employee Services Program can also assist USD with implementing a customized commuter program for employees and students to help alleviate an increase in parking demand and single occupant vehicle trips associated with enrollment growth of full-time equivalent students. More information on these programs can be accessed through www.iCommuteSD.com.</p>	E-6	Comment noted.
E-7	<p>Other Considerations</p> <p>SANDAG has a number of additional resources that can be used for additional information or clarification on topics discussed in this letter. These can be found on our website at www.sandag.org/figr:</p> <ol style="list-style-type: none">1. SANDAG Regional Parking Management Toolbox2. Riding to 2050, the San Diego Regional Bike Plan3. Regional Multimodal Transportation Analysis: Alternative Approaches for Preparing Multimodal Transportation Analysis in Environmental Impact Reports4. Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region5. Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities	E-7	Comment noted.
E-8	<p>When available, please send any additional environmental documents related to this project to:</p> <p>Intergovernmental Review c/o SANDAG 401 B Street, Suite 800 San Diego, CA 92101</p> <p>We appreciate the opportunity to comment on the USD Master Plan Update Draft SEIR. If you have any questions, please contact me at (619) 595-5609 or via email at katie.hentrich@sandag.org.</p> <p>Sincerely,</p> <p></p> <p>KATIE HENTRICH Regional Planner</p> <p>KHE/ais</p>	E-8	Comment noted.



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

Tuesday, February 21, 2017

L. Sebastián, Environmental Planner
City of San Diego, Development Services Center
1422 First Avenue, MS 501
San Diego, CA 92101

Re: USD Master Plan Update, Project No. 417090

L. Sebastián & Development Services,

Save Our Heritage Organisation (SOHO) understands the USD Master Plan Update Project (No. 417090) will result in significant environmental impacts to various areas including Historical Resources. In addition, we acknowledge that mitigation for these resources will be done through the already established 45-year historical review process, as the buildings become 45 years in age.

The USD Campus is comprised of a number of significant historical resources, including Maher, Hahn and Warren halls. SOHO wants to make sure that USD and the City of San Diego are both aware that several historical resources are located on the USD campus and to offer SOHO's guidance and expertise in the Secretary of the Interior Standards, which is used when altering historic resources such as for new connectivity.

Thank you for the opportunity to comment.

Bruce Coons
Executive Director
Save Our Heritage Organisation

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F-1 Comment noted.

F-1

COMMENTS

RESPONSES



San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 February 2017

To: Ms. Lindsey Sebastian
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Subsequent Environmental Impact Report
USD Master Plan Update
Project No. 417090

Dear Ms. Sebastian:

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

Based on the information contained in the DSEIR and the archaeological resources report for the project, we are in agreement with the impact analysis for historical resources. In general, we also agree with the mitigation measures. However, we will reserve final comment for the individual projects' environmental documents. As such, we request to continue to be provided them as part of the normal public review process.

Thank you for providing this DSEIR to us for our review and comment.

Sincerely,

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

cc: Helix Environmental
SDCAS President
File

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

G-1 Comment concurs with the conclusions reached in the SEIR; no response necessary.

G-2 If the project is approved, future development will be allowed through a ministerial action if those projects substantially conform to the approved CUP, SDP, and updated Master Plan, and will not be subject to additional discretionary review.

Section 3.0 of the SEIR outlines the process for implementing the Master Plan Update. The SCR process has been used to implement projects consistent with the 1996 Master Plan and would continue to be the process for projects consistent with the Master Plan Update. During the City's SCR process the Linda Vista Community Planning Group is informed of each project that proceeds and may require input on the project if a Process 2 staff decision is required. If a future project is not consistent with the USD CUP, an amendment to the CUP would be processed similar to the procedures conducted for several of the existing facilities on campus (as outlined in the *Project Background* outlined in Section 1.2 of the SEIR), which may or may not require additional environmental review depending on the extent and nature of the inconsistency. Otherwise, the project will be deemed consistent with the USD CUP and not be issued new or separate discretionary permits. These SCR procedures are outlined in the San Diego Municipal Code.

RINCON BAND OF LUISEÑO INDIANS**Cultural Resources Department**

1 W. Tribal Road • Valley Center, California 92082
(760) 297-2330 Fax: (760) 297-2339



January 18, 2017

L. Sebastian
The City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: USD Master Plan Update Project No. 417090

Dear L. Sebastian:

This letter is written on behalf of the Rincon Band of Luiseno Indians. Thank you for inviting us to submit comments on the USD Master Plan Update Project No. 417090. Rincon is submitting these comments concerning your projects potential impact on Luiseno cultural resources.

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

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

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

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Bo Mazzetti
Tribal Chairman

Tishmall Turner
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

- H-1 The requirement for Native American monitoring is included in Section 9.0 of the SEIR, which identifies the need for the applicant to confer with appropriate persons/organizations when inadvertent discoveries occur during grading activities.
- H-2 The City of San Diego provides draft environmental documents to Native American Tribes from San Diego County when a cultural resources report has been prepared and/or archaeological monitoring is required.

COMMENTS

RESPONSES

Dear Mr. Fisher and Sebastian,

Subject:

Project Name: USD Master Plan Update
Project No. 417090/SCH No. 1993121032
Community Plan Area: Linda Vista
Council District: 2

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the USD Master Plan and Conditional Use Permit update. I am a resident of University Canyon West, a residential complex of approximately 200 townhouse units adjacent to and north of the USD campus and directly east of Tecolote Canyon. I attended the USD Master Plan Community Open House on January 17 and appreciated the university's efforts to outreach to the neighboring communities. I discussed my concerns which are outlined below with Mr. Thomas Cleary and several of the environmental consultants at that meeting.

I understand that the document is a Master Plan and is of necessity general and conceptual in nature. Many of the details of the contemplated future projects such as construction schedules and access, lighting design, public address systems, traffic control plans, etc. are not yet available and will not be until that time when specific designs and proposals are developed and finalized. Therefore, my comments are also general in nature.

Generally my concerns are in regards to traffic, access, lighting, noise, hours of operation, cumulative impacts and the proposed City review process.

Traffic:

- Since "sharrows" have been incorporated along Via las Cumbres the lane width for cars seems to be compromised. I would request that USD work with the City to eliminate parking on that street. Particularly, since the Master Plan contemplates additional parking on site to accommodate future growth, street parking should not be necessary.
- Why does the document utilize the LOS (level of service) method instead of VMT (vehicle miles travelled) in the traffic analysis? I believe VMT is the new standard for metrics in CEQA. Please address this in the environmental document.

Access:

- Construction access should occur off of Linda Vista Road, not Via las Cumbres. The document does not address this issue.
- Future student and sporting event access should also occur off of Linda Vista, not Via Las Cumbres. This is the current condition and that practice should continue in the future.
- Provide assurances that the entry along Via las Cumbres will be for emergency purposes only.

I-1 Comment noted; please see responses to comments I-2 through I-10.

I-2a The concerns regarding street parking expressed in this comment are not related to the Master Plan Update or its SEIR since there are plans to build additional parking on campus commensurate with the campus growth. No improvements to Via Las Cumbres are requested as part of the project. The presence of street parking along Via Las Cumbres was not factored into the supply needed to serve the campus.

I-2b The level of service (LOS) standard used in the SEIR and Transportation Impact Analysis (Appendix C) is still in place as the metric for measuring and assessing project impacts. The guidelines for analyzing the vehicle miles travelled (VMT) metric has not yet been finalized and adopted by the Governor's Office of Planning and Research (OPR). The City (and all jurisdictions) will then have a 1 to 2 year opt-in period to develop a methodology. Nonetheless, USD has a number of existing and planned programs in place to minimize its off-campus traffic, which are outlined in the SEIR and Appendix C.

I-3a-c Figure 3-4 in the SEIR shows Linda Vista Road as the main campus access and the gated access along Via Las Cumbres as a secondary access for the campus. This would not change under the Master Plan Update. Similar to existing operations, the use of the Via Las Cumbres access would be restricted to emergencies and special events.

COMMENTS

RESPONSES

Lighting:

- An analysis should be completed comparing existing conditions to those that will occur after the improvements are completed.
- Lighting for the new parking structure and NCAA soccer field in the northeast corner as well as the golf center adjacent to Tecolote Canyon should be addressed.

Design Guidelines:

- Should ensure that lighting does spill over onto adjacent residential areas as well as Tecolote Canyon and that lighting type is consistent with the City/County Dark Skies ordinance.
- All lighting should include shielding that will direct lighting downward, including Fowler Park and the proposed soccer field.
- In the visual analysis, a view point should be provided that shows the Fowler Ball Field and new soccer stadium from Tecolote Canyon.

Noise:

- An analysis should be completed comparing ambient conditions to those that will be occurring after the improvements are completed.

Drainage/Erosion:

- Page 5.1-15 - maintenance of drainage systems should occur before and after major rain events, not just annually.

Cumulative Impacts:

- Hours of operation for future projects as well as for the existing Fowler Field should also be discussed and disclosed in this document so that cumulative impacts for lighting, noise, traffic and nuisance can be adequately addressed and analyzed.

Review Process:

- Since the document is very preliminary in nature public comments should be solicited when each individual project is being evaluated so that impacted neighbors can provide meaningful and timely comments on each aspect of the master plan. The Substantial Confirmation Review process, which does not allow for any public comment, is not the appropriate mechanism for any subsequent approvals and next steps, particularly for a project of this scope, uncertainty and with a long time horizon before build out occurs. By example, the Fowler Field project I believe had many more adverse impacts including noise and lighting to adjacent residents than was disclosed in prior documents leading up to that facilities approval.
- Individual CUPs should be required for all future projects to ensure adequate public review and full disclosure. As it stands now, residents will not be notified further of any future projects.

I-4a Lighting is currently used to illuminate buildings, walkways, parking structures, roads and athletic facilities/fields on campus and contributes to existing ambient nighttime light in the project area. The 14 projects identified in the Master Plan Update would add additional sources of light, none of which would involve new athletic field lights. All of the new projects contemplated under the Master Plan Update would be required to comply with the lighting restrictions contained in the outdoor lighting regulations contained in the Master Plan Update and San Diego Municipal Code as described in Section 5.8, Visual Effects and Neighborhood Character, of the SEIR. The City's outdoor lighting regulations in the San Diego Municipal Code are intended to minimize light pollution, promote lighting design that conserves electrical energy and provide adequate lighting for public safety. The City regulations mandate that outdoor lighting fixtures be installed in a manner that minimizes negative impacts from light pollution, trespass, glare and urban sky glow. All new outdoor lighting fixtures are mandated to have shields and flat lenses to control and direct lighting to prevent light and glare overspill on neighboring properties. Exceptions to these requirements include residential entrance lights, landscape and decorative lighting, and lighting for sports/athletic fields. All lighting must be turned off between 11PM and 6AM (refer to Section 142.0740 of the San Diego Municipal Code) within the residential zone.

A discussion of the lighting for existing structures or fields or any of the 16 approved but not constructed projects is not an appropriate subject for the SEIR since the those impacts were addressed in the 1996 FEIR and the current report is focused on the incremental impacts associated with the 14 newly-proposed projects. As noted the cumulative impact analysis of the SEIR, the project's incremental contribution to lighting, in addition to lights from existing development and future projects under the 1996 Master Plan, would not lead to cumulatively significant impacts because each campus project would be required to comply with the City's outdoor lighting regulations to avoid glare and nighttime lighting impacts (as noted in Section 6.2.6 of the SEIR).

I-4b Design Guidelines for lighting of parking structures/facilities and athletic fields are provided in Sections 8.3 and 8.11 of the Master Plan Update (see SEIR Appendix B for details) and each project would be required to comply with the San Diego Municipal Code development regulations described in response to comment I-4a. The existing and approved campus development referenced in this comment were constructed or will be constructed under the 1996 Master Plan and are not the subject of this SEIR.

The northeastern parking structure lighting adheres to the outdoor lighting regulations in the San Diego Municipal Code. The existing soccer field

COMMENTS

RESPONSES

- I-4b cont. uses lighting required by NCAA guidelines is exempt from the shielding and directional requirements per the City's outdoor lighting regulations, except that the fixtures must be turned off by 11PM, as stated in the 1996 FEIR.
- Lighting for the approved golf center was addressed in the Wellness and Recreation Center Mitigated Negative Declaration on file with the City and will adhere to the applicable sections of the City's outdoor lighting regulations and NCAA guidelines as well.
- I-5a Compliance with the outdoor lighting regulations in the San Diego Municipal Code would ensure that any new light fixtures installed on proposed facilities would not spill onto adjacent residential areas.
- Conditions of approval related to the project's compliance with the MSCP would prohibit light spill into Tecolote Canyon as discussed in the Land Use section of the SEIR.
- Because the project is over 30 miles from the Palomar and Mount Laguna Observatories; dark sky lighting restrictions are not enforced by the City.
- I-5b According to the City's outdoor lighting regulations, sports and athletic fields on campus, such as Fowler Park, soccer field and golf practice facility, are exempt from having to use shields and flat lenses to control and direct light, as discussed above under I4a.
- I-5c Fowler Park and the soccer field are existing facilities that currently contribute light to the project area during the nighttime. No changes to these fields or their operations are proposed under the Master Plan Update. No new athletic field lighting is proposed as part of the project; therefore, a visual analysis from Tecolote Canyon is not required.
- I-6 A noise analysis was conducted for the Master Plan Update and is presented in Section 7.1.6 of the SEIR. The project would not increase ambient/existing noise levels by 3 or more decibels. Therefore, impacts were determined to be less than significant.
- I-7 Maintenance of drainage systems is the City's responsibility, not that of the Applicant, and completed on a regular schedule.

COMMENTS

RESPONSES

- | | |
|-----|---|
| I-8 | <p>Hours of operation for all campus development would comply with the San Diego Municipal Code. Cumulative impacts from lighting, noise, traffic and other disciplines are addressed in Section 6.0 of the SEIR. The only cumulatively significant impacts attributable to the project are from traffic and construction-related air quality, both of which would remain unmitigated.</p> |
| I-9 | <p>The SEIR is not preliminary in nature as suggested by this comment. To the contrary, the CEQA document addresses the environmental impacts of implementing the Master Plan Update as a whole. The SEIR serves as an information document that discloses to the public, agencies and decision-makers the breadth of the project impacts. The opportunity to comment on the conclusions reached in the SEIR occurs during the public review and hearing process for the discretionary approval (i.e., CUP amendment). The amended CUP that could be issued by the City for the Master Plan Update becomes the umbrella approval for all subsequent projects. If the project's amended CUP is issued, additional public review will only be required if a future project is not consistent with the SEIR and/or the Master Plan Update and requires a new CEQA document and discretionary approval. Otherwise, projects proposed under the Master Plan Update will proceed through the City's SCR process as described in the SEIR and reiterated in response to comment G-2.</p> |

COMMENTS

RESPONSES

- I-10
- I also understand that many of the project sites have already been approved (1-16) and that Sites 17-30 are new projects. The document discusses that site #16 encroaches in the MHPA and that a simple boundary adjustment will be done. There should be additional land added in the MHPA to make up for this deficit, even if it was a simple mapping error.

Best Regards,
Beverly Blesstent
6129 Caminito del Oeste
858-805-1075
beverlyblyss@gmail.com

- I-10 Projects at Site Nos. 1 through 16 were analyzed in the 1996 Master Plan FEIR and the Wellness and Recreation Mitigate Negative Declaration and have already been approved by the City, including the MHPA boundary line correction associated with Project Site No. 16. They are not the subject of this SEIR.

COMMENTS

RESPONSES

Date: February 17, 2017

SUBJECT: Concerns/Objections/Questions from Virginia LaGuardia - owner of 5710 Josephine - parcel # 436-390-01-00 Silver Terrace single-family residential subdivision - pertaining to to the latest USD 2017 CUP update plan/proposal/REF (1).

IN PARTICULAR - WHY IS USD PROPOSING TO BUILD A FOUR STORY PARKING GARAGE/STRUCTURE IN A RESIDENTIAL AREA - A MERE 20-30 FEET FROM A HOME – AND – IS THIS AN ATTEMPT TO DEVALUE MY HOME?

TO: San Diego Planning Commission and the Linda Vista Planning Group.

REF (1) **The Draft Subsequent Environmental Impact Report, development services department SAP No. 24005737. Prepared from the USD Master Plan PTS No. 417090 / SCH No. 199312132**

Based on;

REF (2) **The CUP update of 1996 PRO permit No.92-0568 CUP No. 10325 and CUP No. 489856**

(complete title)

We will discuss the following Project:

- Project Name: USD MASTER PLAN UPDATE
- Project No. 417090 / SCH No. 1993121032
- Community Plan Area: Linda Vista
- Council District: 2

Project Description: The project requests a CONDITIONAL USE PERMIT (CUP), SITE DEVELOPMENT PERMIT (SDP) and EASEMENT VACATION to amend CUP/Resource Protection Ordinance (RPO) Permit No. 92-0568, CUP No. 40-0419, CUP No. 10325 and CUP No. 489856 to accommodate an increase in enrollment from 7,000 full-time equivalent students (FTE) to 10,000 FTE students over the next 15 to 20 years. Specifically, the project would update the Design Guidelines that provide a design framework for campus development and construct 14 individual projects for academic and administrative buildings, student housing, athletics and recreation amenities, parking, pedestrian circulation, and landscape improvements. Further, City water facilities and one City storm drain easement would be vacated. Deviations from applicable regulations to height and floor area ratio are also being requested. The project would conform to the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program by meeting the U.S. Green Building Council Leadership in Energy and Building Design (LEED) Silver (or equivalent) requirement. The approximate 180-acre project site is located at 5998 Alcala Park. The parcel is designated Institution within the Linda Vista Community Plan. The site is within the OR-1-1, RS-1-7, RM-1-1, RM-3-7, and CC-4-2 Zones.

Dear San Diego Planning Commission - and Linda Vista Planning Committee Members

Please accept my following input and I request that this letter may be further updated. Unfortunately - my husband of 43 years passed away this past December 31, 2016 - and I have not yet been able to retain a Land Use Attorney - which I am planning to do if need be.

/

J-1 The potential devaluation of property is not an issue analyzed under CEQA. USD has determined that it needs additional parking and housing to handle the student growth anticipated in its long-term plans. Pursuant to CEQA, this SEIR is required to identify the significant effects of a project on the environment to identify alternatives, and to indicate the manner in which those significant effects can be mitigated or avoided. According to CEQA Guidelines §15064(e) and 16131, an EIR need not address economic or social changes unless those changes would result in a significant physical environmental impact.

J-2 Comment summarizes information contained in the SEIR; no response necessary.

COMMENTS

RESPONSES

Respectfully Submitted:

Virginia LaGuardia,
5701 Josephine St. San Diego, CA 92110
Our home for over 40 years

- I. 5701 JOSEPHINE STREET/parcel # 436-390-01-00, SILVER TERRACE SUBDIVISION, HAS BEEN OUR HOME FOR OVER 40 YEARS – AND IS NOT IN LINDA VISTA MASTER PLAN 1996 WHICH I REFER TO AS THE “Missing Parcel.”
(see attachment #1- highlighted in yellow.)

J-3

The USD 1996 Master Plan (Ref 2) - did not address/include my parcel # 436-390-01-00 home at 5701 Josephine Street, Silver Terrace **single-family** residential subdivision when it was updated in 1996, Was not part of the 180+ acre project. □ □ This 5701 Josephine parcel was in fact outside of the identified boundaries lines in Ref #2 - the 1996 CUP/Update - and this parcel 5701 Josephine St - has never been part of the USD CUP or campus. (See attachment #2 Silver Terrace **single-family** residential subdivision in Red.) □ □

J-4

Other adjacent/nearby Parcels owned by USD now, were also not in The CUP update of 1996 PRO permit No.92-0568 CUP No. 10325 and CUP No. 489856, in the Silver Terrace **single-family** residential subdivision parcels: # 436-390-02-00, # 436-390-03-00, # 436-390-04-00, # 436-390-05-00, # 436-390-06-00, # 436-390-07-00, # 436-390-08-00, # 436-390-09-00, # 436-390-10-00, # 436-390-11-00, # 436-390-12-00, # 436-390-13-00, # 436-390-14-00, # 436-390-15-00, # 436-390-16-00, # 436-390-17-00, # 436-390-18-00, # 436-390-19-00, have residents that attend the University, just like many other Silver Terrace owners do. That does not make them part of the USD CUP. USD's new boundaries have not been identified in these two reports, as part of the updated to the 180--acres. The USD boundaries have not been AMENDED (See attachment / parcel map #3)

J-5

Question One. This naturally leads to the paramount question:
Where is the ENVIRONMENTAL IMPACT REPORT for this “missing parcel”?

J-6

Again - the Silver terrace subdivision single-family, residential zone neighborhood, has been incrementally acquired by the University over the past several decades - but 5701 Josephine St. - Our home for over 40 years - was not part of the 1996 update or the “new update” that refers to the 1996 update.

Actually - even in the current report - the first reference to 5701 Josephine is only initially discovered about a fourth of the way through this 438 page document. in Section 3.11. (Ref 1). as “**Master plan update**”. (See attachment #4)

J-7

Additionally - there may be OTHER parcels that were never included in these two updates - such as public right-of-way, Brunner Street, Josephine Street, 19 foot unnamed alley, and our legal access for the Silver Terrace single-family residential subdivision, the Josephine paper street. (See attachment #5)

2

J-3

As indicated in this comment, the parcel at 5701 Josephine Street (APN 436-390-0100) was not a part of the 1996 Master Plan and is not part of the current project. All figures within the SEIR have been updated to clearly exclude this parcel.

J-4

Since the 1996 CUP was approved, the USD campus has acquired a number of parcels in the Josephine Street neighborhood that are mentioned in this comment, thus expanding its property ownership adjacent to the campus. The one parcel not acquired by USD is the 5701 Josephine Street parcel mentioned in this comment. This parcel remains outside of the boundaries of the existing CUP and is not a part of the USD Master Plan Update or within the proposed boundaries for the amended CUP, as noted in comment J-3.

USD is proposing to incorporate the other Josephine Street properties acquired since 1996 into the amended CUP. Approval of the CUP amendment would modify the boundaries of the existing CUP to include the current USD ownership (as represented in the Master Plan Update and depicted in the SEIR). The property at 5701 Josephine Street will remain outside the boundaries of the amended CUP. As such, that property was identified in the Master Plan Update and SEIR as a parcel that is Not a Part (NAP).

J-5

A “project” is defined in Section 15378 of the State CEQA Guidelines as an action or activity that has a potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. Typically, a project involves an activity involving the issuance of discretionary approvals by one or more public agencies. USD’s CUP amendment is not a project or application for an activity on the 5701 Josephine Street property. Therefore, there is no need for the City to prepare an environmental review document for the parcel at 5701 Josephine Street.

J-6

Comments noted; please refer to response to comment J-4.

COMMENTS

RESPONSES

J-7	<p>The public streets, rights-of-way and facilities noted in this comment are not a part of USD's proposed CUP boundary, including Brunner Street, Josephine Street, the 19-foot alley and the Josephine paper street. There are no public street vacations proposed by USD, only public utility easement vacations and the closure of an unsignalized intersection, as described in Section 3.0 of the SEIR. The legal description provides the precise limits for the properties contained in the CUP boundary; the figures in the SEIR and Master Plan Update are planning illustrations only and not legal boundaries.</p>
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COMMENTS

RESPONSES

- J-8 **Question Two:** Under the description referred to as "revised update" or "update plan" or "Master plan update" why is this not recognized on the cover page, or application description? There are two versions being referred to in this one document? ☐ ☐ There has not been any legal description of boundary lines being altered.
The new "revised update" in this report, refers to properties without any legal description, or impact required for a CUP. This is very confusing, it even has alternating footprints, for two plans. (See attachment #6--after blank page 3-18, Figure 3-1, Figure 3-2, Figure 3-3, Figure 3-4, Figure 3-5, Figure 3-6.)
- J-9 **Question Three:** "Discretionary Actions" Is this referring to Josephine Street, Silver Terrace single-family residential subdivision, not in update in 1996, and not part of the 180-acre project. (See attachment #7. page 3-16. Section 3.0, 3.5 Discretionary Actions, 3.51)
The City maps in the report show 1996 boundaries, not the "revised update" boundaries. The "revised update" boundaries have not been recorded, with the City or the Linda Vista planning group.

The impact has not been recognized, studied or clearly defined. (See attachment # 8 USD Figure 2-2, & Figure 2-4 and Section 3.0 page 3-2)
- J-10 **Question Four:** When I asked the question, in my last letter Jan.17, 2017 - (see attachment # 9) ☐ - "where the new boundary line (including silver terrorist description and public right away) is in the 2017 document, WHEN did that change"? The USD applicant Mr. Ky Snyder responded, refers to "it". ☐ ☐ There are no solid answers, and pray tell - what is "it"? (See attachment # 10) ☐ ☐ USD needs solid answers for a CUP.

To repeat - the proposed opportunity does not comply with the current zoning, or the current Linda Vista master plan - which naturally calls for the following question: What impact is this omission going to have on the "missing parcel" Josephine Street, Silver Terrace single-family residential subdivision, our home of over 40 years? (See attachment # 11 photo)

Our single-family residential subdivision will be gone.
- II. MORE QUESTIONS/CONCERNS ABOUT THE PROPOSED FOUR STORY PARKING GARAGE/STRUCTURE.**
☐ ☐
- J-11 Additionally - what about the continuing quality of life, and being bombarded with increased noise and car alarms going off in the proposed FOUR STORY parking structure (Note - we already hear the noise from the parking structure across the canyon). ☐ ☐ Can you imagine this being a few feet from your bedroom? What about the exhaust fumes from vehicles; we will have to keep our windows closed, and the grandkids will not be able to play in the backyard.☐

Oh yes - assuming this proposed parking structure will have to be brightly lit - around the clock (to prevent among other things - "rape traps") - these banks of lights - are going to be what - 20 feet from our bedrooms?

3

- J-8 The project analyzed in the SEIR is a Master Plan Update. The subject property noted in this comment is not a part of the campus' application for the Master Plan Update as outlined in response to comment J-3. Thus, it is not appropriate or accurate to include the property in the project's application description. The subject property's boundaries were clarified in the Final SEIR (in response to the commenter's prior input to the campus on the Master Plan Update). The following figures have been revised in the Final SEIR to consistently reflect the property lines for the 5071 Josephine Street parcel: Figures 2-2, 2-3, 2-5, 3-1, 3-4, 5.1-1, 5.3-1, 5.3-2 and 5.8-2. The property line boundary clarification does not affect the analysis or conclusions reached in the SEIR. In addition, the single-family residence on the 5071 Josephine Street parcel is clearly visible on the aerial photographs contained in the SEIR and has been noted on page 2-3 of the Final SEIR under *Surrounding Land Uses*.
- J-9 The term "discretionary actions" refers to those entitlements being sought from the City by USD in association with the Master Plan Update application. By definition, the discretionary actions only pertain to parcels that are a part of the project application. Refer to response to comment J-3 which explains that the 5701 Josephine Street property is not a part of the application and is not the subject of the SEIR.

If USD's project application is approved, the newly amended CUP would formally modify the boundaries of the 1996 CUP to incorporate the additional acquired parcels. As required by CEQA, the figures and impact analysis in the SEIR address the project as a whole, including the additional parcels acquired by USD since 1996. The CUP boundaries would be legally defined by information contained in the title report that describes the property ownership and will be attached to the permit itself. All of the figures in the SEIR, as well as Sheet C0.4 in SEIR Appendix B, show all the parcels within the limits of the proposed CUP boundary.
- J-10 The "it" referenced in USD's response in Attachment #9, refers to the Master Plan Update document. As noted in response to comment J-9, the 5701 Josephine Street property is not a part of the application and is not the subject of the SEIR. A rezone is not required because the CUP allows the campus to operate an institutional use within the residential land use designation outlined in the Linda Vista Community Plan and residential zone. No rezone is required to implement the project; deviations from the residential base zone are allowed under a Site Development Permit. None of the entitlements being sought by the campus would significantly impact the adjacent single family residence. Refer to response to comment J-1 regarding what defines a significant environmental impact.

COMMENTS

RESPONSES

- J-11 Development of a student housing structure with parking at its base grade at Project Site No. 23 would not result in the potential environmental impacts or safety concerns suggested in the comment. Specifically, “quality of life” is not a topic for discussion in a CEQA document unless it results in physical environmental impacts which this comment does not address. The parking structure would be constructed partially below grade and required to comply with the City’s Noise Ordinance limits; any emissions from cars driving inside the parking structure would be ventilated toward Linda Vista Road due to its open design, localized within the structure itself, and not be expected to drift upwind toward the commenter’s property; and lighting would be required to comply with the City’s outdoor lighting regulations contained in the San Diego Municipal Code. The San Diego Police Department encourages applicants to incorporate Crime Prevention Through Environmental Design (CPTED) features as a means to deter crime and ensure users’ safety. The Master Plan Update contains a detailed set of Design Guidelines that would implement the City development regulations for the campus. The Design Guidelines were developed to address each project’s compatibility with and sensitivity to adjacent uses and would be implemented as part of that project’s final design. For these reasons, the SEIR concludes that less than significant noise, air quality and visual effects/neighborhood character impacts would occur during project implementation.

COMMENTS

RESPONSES

- J-12 Further - is there going to be a 10:00 pm to 8:00 am curfew so we can sleep at night? So people will not hear noise echoing in the car garage?
- J-13 How big is the structure, how many cars is it going to accommodate, and what impact will it have on the student housing across the alley.
- J-14 Is the 19 foot alley way going to be widened to accommodate these vehicles, and our public right away?
- Will it be a standard Street size?
- Where is this land coming from?
- Where will the street frontage be, for setbacks?
- Is it going to be a one-way alley?
- J-15 What about the 8-inch sewer main located in the alley?
- J-16 What impact will this have on Linda Vista Road when the students all leave?
- Are they going to put a signal in?
- J-17 In the past they said our property was down zoned to single family, so there would not be additional traffic on Linda Vista Road because of the curve and the visibility, and potential hazard of cars pulling out into the traffic.
- J-18 The traffic maps do not show the Silver Terrace single-family residential subdivision, the Josephine paper street, as part of USD CUP. The traffic maps show 1996 boundaries, not the "revised update" boundaries.
- J-19 How's the air going to circulate up against my three-story house and your three-story student housing, and the four-story parking structure?
- J-20 What effect is the water run off from all these cars and new structures going to have on the green belt, the natural drain at the end the alley? □
- J-21 Out of the 180+ some acres, is this the only location for this sort of structure in a residentially Zoned neighborhood?
- Why not a little more eastward and north snuggled up into the hillside, so it could be accessed from above and below? And not be up against our home or the student housing.

- J-12 The project's hours of operations would be similar to other facilities on campus and comply with the City's regulations. Because of its placement partially below-grade and orientation toward Linda Vista Road, the structured parking would not have the potential to result in noise that would exceed the property line limits established in the City's regulations, as stated Section 7.1.6, *Noise*, of the SEIR.
- J-13 According to Table 3-1 in the SEIR, Project Site No. 23 would allow for a four-story structure that is up to 55 feet in height. The bulk and scale effects of projects proposed in the Master Plan Update are addressed in Section 5.8, *Visual Effects and Neighborhood Character*. As noted on page 5.8-14 of the SEIR, a four-story structure could be built on Project Site No. 23. The structure would not be four stories in the traditional sense because only one to two stories of the structure would face Linda Vista Road and the Design Guidelines in the Master Plan Update require it to be terraced or stepped with the sloping topography. Landscaping would be incorporated near buildings to soften the building mass and provide screening. As noted in the SEIR, more detailed guidelines are contained in the Master Plan Update which specify a site-specific layout, building design and spatial orientation requirements. In the case of Project Site No. 23, Focus Area Guidelines K apply to the south slope and Josephine Street area, including Project Site No. 23 (refer to SEIR Appendix B). The Focus Area K Design Guidelines specify, among other features, that new residential structures be nestled into the slope to reduce building massing and visual prominence from Linda Vista Road; parking should have open ventilation, feature architectural treatments similar to other garages on campus, and have lower levels that would be screened from neighboring uses; and buildings should have landscape setbacks. The number of parking spaces would be determined during final project design and balanced with the overall need for parking on the campus. Figure 5.8-5a in the Final EIR shows a cross-section of the structure conceptualized in the Master Plan Update. As shown in that figure, ground-floor parking would be placed partially below grade to reduce it mass and housing would be contained within structure's upper levels. A setback between the existing one-way alley and the proposed structure would be created upon redevelopment of the site. The Design Guidelines also require the integration of sensitive design techniques to blend each of the parking structures in with existing development as described in Section 8.3 of the Master Plan Update (SEIR Appendix B). Section 8.7 of the Master Plan Update also addresses the visual softening of parking structures through landscape screening. Finally, the proposed parking structure would comply with the development regulations contained in the San Diego Municipal Code Section 142.0560, which require shielding parking areas from view, using directed safety lighting, and integrating landscape screening, as required by City regulations. The existing student housing across the alley from the commenter's property is owned by USD and would be removed and replaced by Project No. 23.

III. HOW WILL THE PROPOSED CHANGES ADVERSELY AFFECT THE VALUE OF OUR HOME OF OVER 40 YEARS?

4

COMMENTS

RESPONSES

- J-14 As noted in Attachment 11 to the commenter's letter, the Josephine Street single-family residence is currently situated less than 5 feet from its eastern property line with a 20-foot wide alley located between the property line and the University's ownership. East of the alley on the University's property is a two-story apartment complex with off-alley surface parking. As shown in the attachment, the area between the commenter's property line and the on-site apartment building is paved and no landscaped screening exists on the campus property. Beyond the view contained in the attachment, the University owns land that contains a single-story residence with its front yard immediately east of the commenter's property. Under the Master Plan Update, the on-site apartment complex/parking area and single-family home would be redeveloped with a new student housing/parking structure, thus eliminating the existing surface parking along the alley and replacing both residential structures with a new student housing/parking structure that would feature landscaped screening and below-grade structured parking that would not be visible from the off-site property.
- The structure would not be constructed within 20 feet of the adjacent home. Conceptual layout of the structure relative to the adjacent parcel boundaries and residence is contained in Exhibit C24.0 on file with the City. As shown in that exhibit, the proposed structure would be setback 10 feet from the eastern edge of the existing 20-foot wide alley for a minimum total distance of 30 feet from the commenter's property line. That setback distance would increase to a 38-foot minimum where the on-site single-family structure currently occurs. The one-way alley would be retained in place during project implementation.
- J-15 No changes to the 8-inch public sewer main within the alley are proposed as part of the Master Plan Update.
- J-16 The traffic impacts associated with the proposed Project Site No. 23 are addressed as part of the whole Master Plan Update in Section 5.2 of the SEIR. The traffic analysis is based on full-time enrollment. The project has a significant impact at the intersection of Linda Vista Road/Colusa Street which would be mitigated by the installation of a traffic signal prior to the increase of enrollment of 50 more students (refer to traffic mitigation measure Tra-3 for details).
- J-17 Comment noted.

COMMENTS

RESPONSES

- J-18 The traffic figures contained in the Draft SEIR are provided for illustrative purposes and do not represent the legal boundaries of the proposed CUP as noted in response to comments J-7 and J-8.
- J-19 Section 5.5 of the SEIR addresses project impacts to air quality. The City determined during preliminary review of the application and scoping of the CEQA document that air circulation would not to be adversely affected by the project due to the prevailing westerly winds which blow air from the Pacific Ocean eastward as noted on page 5.5-1 of the SEIR. Placement of a new structure east of the off-site residence would not affect those prevailing winds or result in a substantial alteration of air movement in the area.
- J-20 Less than significant impacts related to changes in runoff and water quality are described in Section 5.6, *Hydrology/Water Quality*, of the SEIR. Compliance with the City and State stormwater regulations would prevent impacts to the natural drainage west of the project site.
- J-21 Most of the USD campus is zoned for residential use and its institutional use requires City approval of a Conditional Use Permit (CUP). The campus currently operates under its 1996 CUP/RPO Permit. A CUP allows the City to review a project and its uses to determine whether and under what conditions the use may be approved at a given site. In addition to Project Site No. 23, parking structures and student housing are proposed in three other locations of the campus, specifically, at Project Site Nos. 24, 27 and 30 (see Figure 3-6 in the SEIR). The sites were chosen for their ability to connect with other campus spaces and similar residential uses. Project Site No. 23 is identified for a future student housing/parking structure because the site is currently used as a multi-family residential housing complex and single-family residence (i.e., residential uses). The site takes advantage of the developed/disturbed lands associated with this existing development and minimizes impacts to environmentally sensitive lands that exist in that portion of campus. No significant impacts to residential uses are identified in the SEIR because the Master Plan Update and its Design Guidelines take into consideration the project's consistency with on- and off-campus uses and provide development regulations (i.e., Focus Area K Design Guidelines) to prevent such impacts.

COMMENTS

RESPONSES

- J-22 We cannot relocate our home of forty plus years, out primary investment. We added value to the neighborhood, and the Linda Vista community. We demolished an old structure on a septic tank, paid all the fees and got all the permits, and made a huge investment. We built an eight bedroom, six bathrooms home, that included a granny flat for my parents to live in. My father was the head chaplain at Alvarado Hospital, and this gave him the freedom to do his ministry by living with us. We were an extended family and we are today, with my daughter and family living with us.
- J-23 When we were very actively involved in the community - we hosted various events, LV planning meetings, USD and USF fundraisers at our home even some political fundraisers, 5701 Josephine St.
- No doubt you can imagine - a lot of thought and research went into rebuilding. We invested in good faith according to all of this city's guidelines, including some that are not even discussed in your environmental impact report/considerations, such as the Geology report and the structural engineering report. I had to produce these for the city, because of the branch fault through the campus (In the La Jolla quadrangle plate 2A)
- J-24 What about the liquefaction in the pillowhills on the south side of campus. Where USD is proposing to hang student housing on all the fill dirt, put there when the nursing school was built. I have photos for view.
- And as you are probably well aware - we are near a Major Earthquake Fault Line - called the **Newport-Inglewood Fault - also referred to as the Rose Canyon Fault** - that is 47 miles long. It begins/starts up in Los Angeles - offshore of Culver City/Inglewood - and runs southeast - down to San Diego - coming ashore in La Jolla and extending down/across Interstate 5 - along Morena Street - ending up as 2 branch faults on Marian Way. USD calls it a "suspected Fault mapped is 50 feet" away. (See attachment section 7.0 page 7-6 # 12)
- J-25 It was this Newport-Inglewood-Rose Canyon fault line that was responsible for the biggest jolt ever felt in San Diego - which was called the Long Beach earthquake. It occurred on March 10, 1933, centered along the southern segment of this fault, and it registered a magnitude 6.3. This quake killed 115 people and was the second most deadly earthquake in California history - AND it is still a very active fault line.
- Accordingly - we had to build a very solid - extra-reinforced frame for our home at 5701 Josephine St. - plus upgraded-stronger footing/foundation requirements - among other increased code requirements.
- The Rose Canyon Fault concerns would certainly also apply to USD property - further complicated by the fact there is liquefaction in the pillow hills and land fill.
- As far as I can determine - this has also not been researched or really looked into - according to your report.
- There maybe safer locations for these buildings. Who will have the liability here?
- J-26 And with reference to USD latest Update-REF 1, I sent my first letter in April 25, 2016 - and it is not recognized/listed in USD environmental impact findings. . (See Attachments #15 .) The environmental impact findings reflected, "A total of four letters received"; and you recognize overlook

- J-22 The project does not require the relocation of the home at 5701 Josephine Street and would not result in any significant environmental impacts, as discussed in the SEIR. Pursuant to CEQA Guidelines §15064(e) and 15131, an EIR need not address economic or social changes unless those changes would result in a significant physical environmental impact. According to the CEQA Guidelines, economic and social changes resulting from a project are not treated as significant effects on the environment unless they result in a physical change that is regarded as a significant effect.
- J-23 Comment noted.
- J-24 All geologic hazards, including liquefaction, are addressed in the Geologic Conditions discussion contained in Section 7.1.3 of the SEIR to the satisfaction of the City Engineering Department and the project's consulting geologist (refer to Appendix L). When final designs are developed for each new structure on campus, including the future student housing/parking structure on the south side of campus, the City would require detailed geotechnical investigations be prepared to comply with the state and local regulations pertaining to geologic hazards, such as liquefaction. No significant liquefaction impacts are identified in the SEIR.
- J-25 All of the geologic hazards that apply to the project site, including fault lines and earthquake hazards, are addressed in the *Geologic Conditions* discussion contained in Section 7.1.3 of the SEIR to the satisfaction of the City Engineering Department and the project's consulting geologist (refer to Appendix L). When designs are developed for each new structure on campus, the City would require detailed geotechnical investigations be prepared to comply with the state and local regulations pertaining to geologic hazards, such as those noted in the comment.
- J-26 The letter noted in this comment was sent to the Linda Vista Community Planning Group but was never forwarded by the commenter to the City in accordance with the proper process for entering comments into the record on CEQA documents (refer to SEIR Appendix A). As noted in Appendix A, the written comments should have been submitted to the identified City staff person at the address listed in the NOP. Nevertheless,

5

COMMENTS

RESPONSES

J-26 cont. Heights concerns about the impact, sent to you by H. Wayne; and also M. Baker's concerns about traffic - I've actually sent more than one letter - with concerns of what effect this would have on the Silver Terrace subdivision from the 1800s.

J-27 I further pointed out to USD that building on the Josephine Street did not comply with the guidelines for public right away, access to our home, and Silver Terrace subdivision. (see attachment # 15)

J-28 USD corrected some of these concerns, and I thought everything looked great; but, in this new/latest proposal - you remove the beautiful patio and student housing, and replace it with a **FOUR STORY PARKING STRUCTURE**.

J-29 I asked USD in a letter about the value of my property. (see Attachment # 16) our home of forty plus years and our primary investment.

J-30 Over the years USD has inquired about purchasing our home. There was even an offer made by then USD VP – Jack Boyce.

J-31 Is this parking structure being situated to devalue my property, make it less desirable, and less habitable?

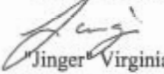
J-31 ☐ Would you want to live next to an unlimited, unknown facility, un-researched, with adverse potential impact on your home and family?

J-32 Again, I do feel the University's projects are for the most part beautiful, but I think I have some very reasonable/unanswered concerns about our primary asset, our home of over 40 years. Not only are our peaceful lives being significantly interrupted - but also our major investment is also suddenly being dramatically downgraded.

J-32 Contrast this with - **The Impacts from Master Plan Update and table 5.41 states, Site No. 23 "5701 Josephine Street--- not a part of Master Plan Area" under Comments "adjacent building not affected by project"**

In summary - now that my husband - who had been ill for some time - passed on New Year's Eve 2016, this is a very big responsibility for me to be dealing with. I request that you accept/consider the questions/concerns I have outlined above and allow/permit me to supplement this letter if I retain a Land Use attorney. ☐ ☐

Very Respectfully,


Jinger Virginia LaGuardia
5701 Josephine St.
San Diego, Ca. 92110
Cell 801-979 1997
Home 619- 296 3392

6

J-26 cont. issues raised in the letter are responded to herein. Please refer to response to comments J-4 (ownership), J-7 (project boundary), and J13 (alley access).

J-27 Comments noted; please refer to response to comments J-1 through J-23.

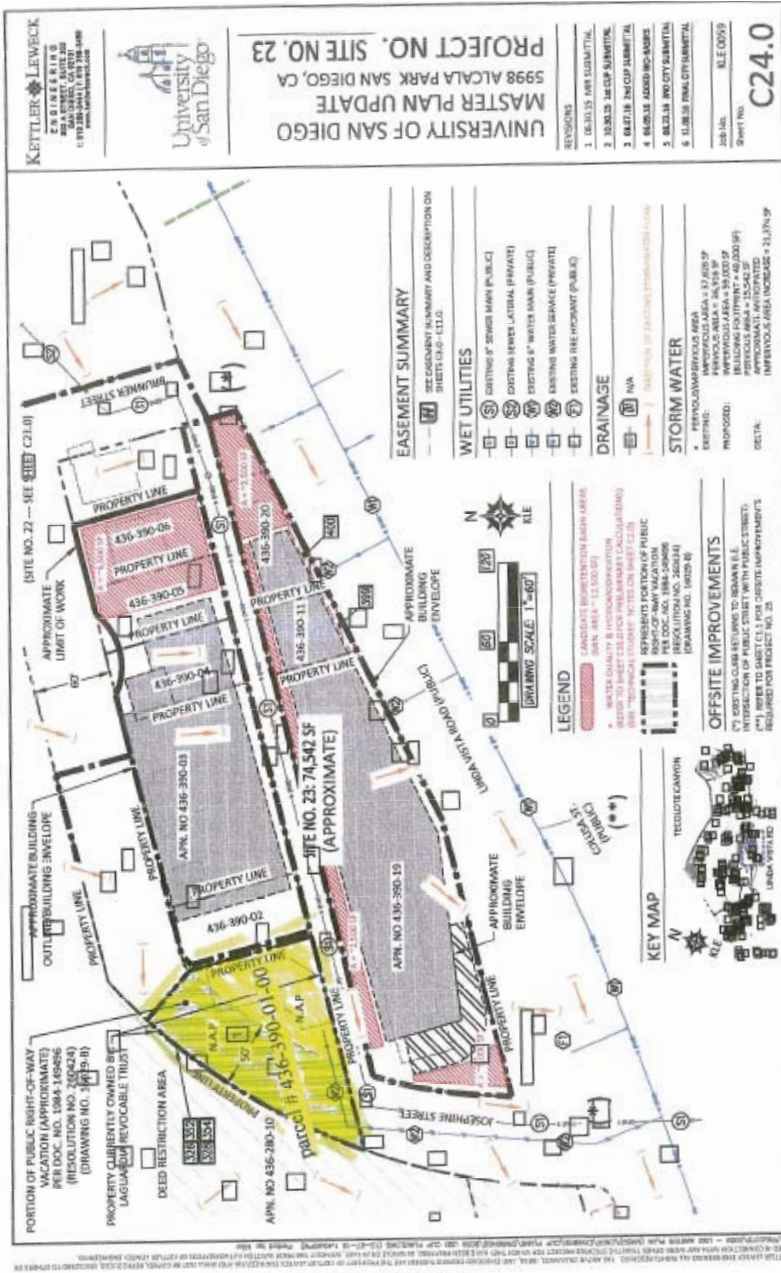
J-28 Comments noted; please refer to response to comments J-1 through J-23.

J-29 Comments noted; please refer to response to comments J-1 through J-23.

J-30 Comments noted; please refer to response to comments J-1 and J-22.

J-31 Comments noted; please refer to response to comment J-1 through J-23. Based on the conclusions of the SEIR, it was determined that any adverse potential impacts would be avoided through compliance with the project's Design Guidelines and/or mitigated to a less than significant level.

J-32 Comments noted; please refer to response to comment J-1 through J-23.



RESPONSES

CHANGES		BX OLD NEWRCUT	
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26-27	27	27	27
28-29	29	29	29
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32-33	33	33	33
34-35	35	35	35
36-37	37	37	37
38-39	39	39	39
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176-177	177	177	177
178-179	179	179	179
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182-183	183	183	183
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188-189	189	189	189
190-191	191	191	191
192-193	193	193	193
194-195	195	195	

MAP 695(434) - SILVER TERRACE
ROS 2419, 10521

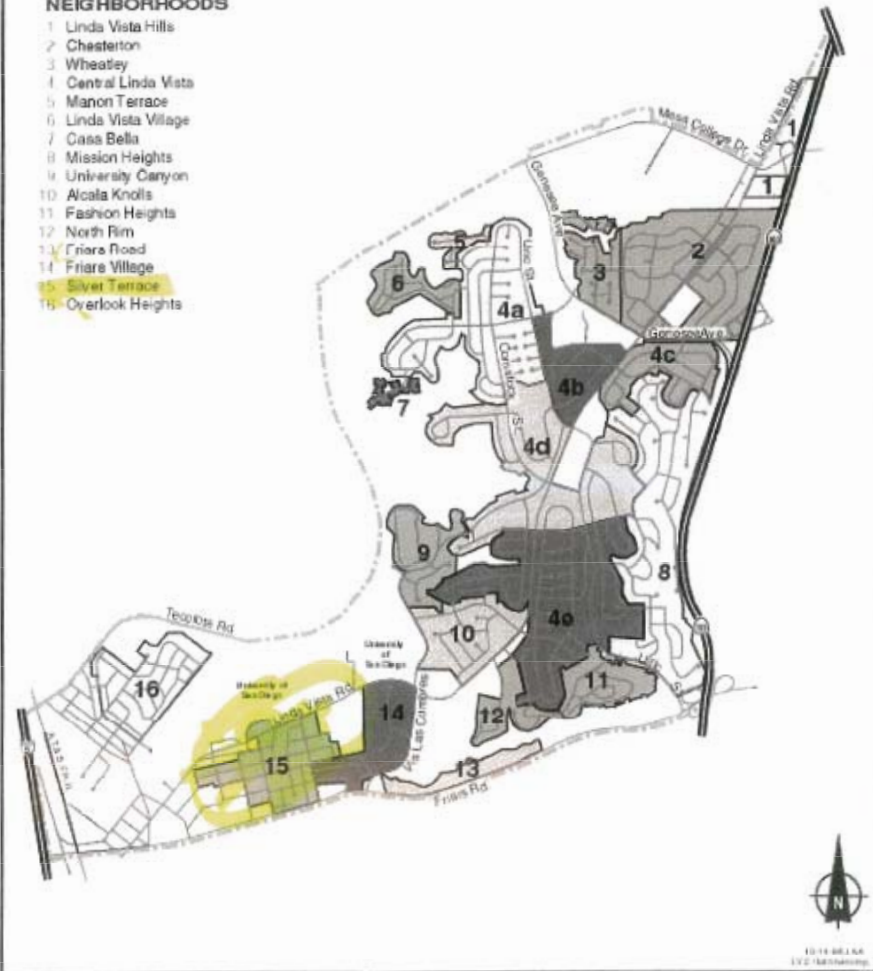
SAN GABRIEL COUNTY
ASSESSOR'S MAP
BOOK 434 PAGE 39.

attachment parcel map #3)

Neighborhood 15/Silver Terrace. This is a neighborhood which has been steadily transforming from a single-family to a multifamily area. The neighborhood has a diverse character. There is a large student population.

NEIGHBORHOODS

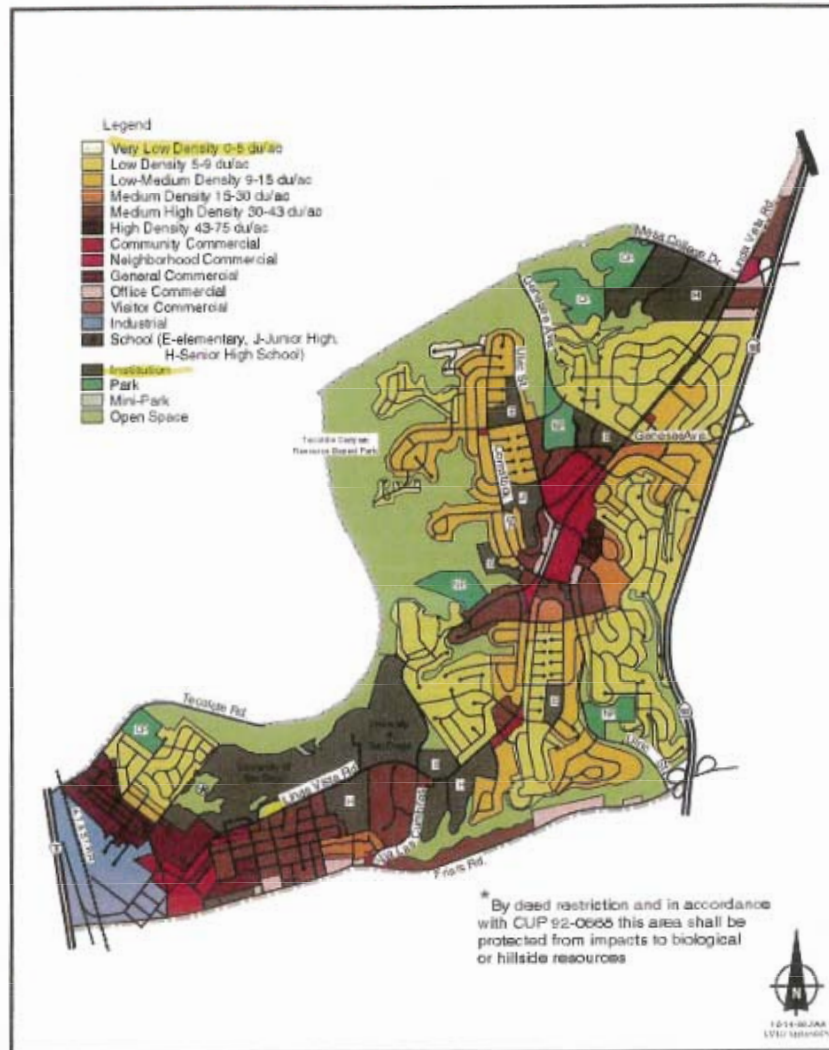
- 1 Linda Vista Hills
- 2 Chasterton
- 3 Wheatley
- 4 Central Linda Vista
- 5 Marion Terrace
- 6 Linda Vista Village
- 7 Casa Bella
- 8 Mission Heights
- 9 University Canyon
- 10 Alcalá Knolls
- 11 Fashion Heights
- 12 North Rim
- 13 Friars Road
- 14 Friars Village
- 15 Silver Terrace
- 16 Overlook Heights



Residential Neighborhoods
Linda Vista Community Planning Area
 City of San Diego • Community and Economic Development

Figure
6

#3a



Community Land Use Map Linda Vista Community Planning Area

CITY OF SAN DIEGO • COMMUNITY AND ECONOMIC DEVELOPMENT

Figure

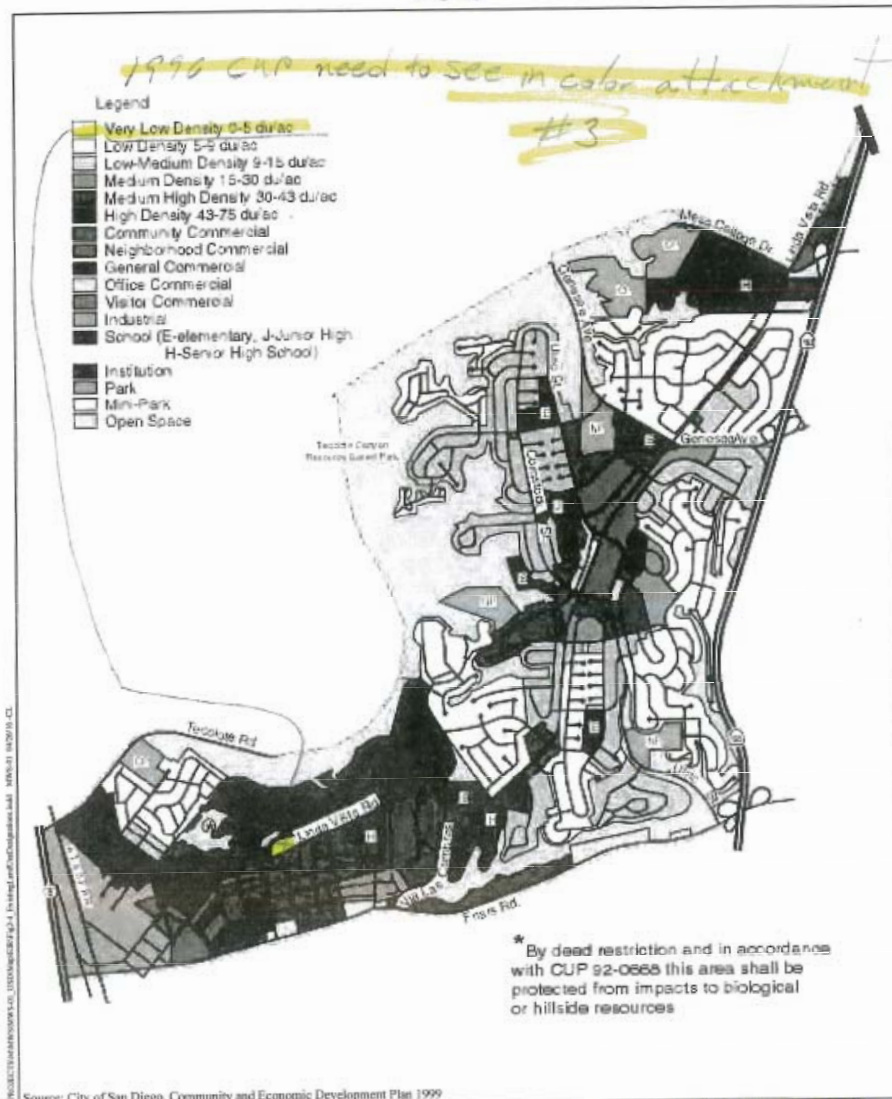
1

Page 3
11/10/2004

COMMENTS

RESPONSES

J-33



J-33 Comments noted; please refer to response to comment J-3.

HELIX
Environmental Planning

Existing Land Use Designations
UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 2-4

existing driveway along site frontage (east side of street) not utilized for access for Site 18 would be removed and replaced with standard curb, gutter, and sidewalk.

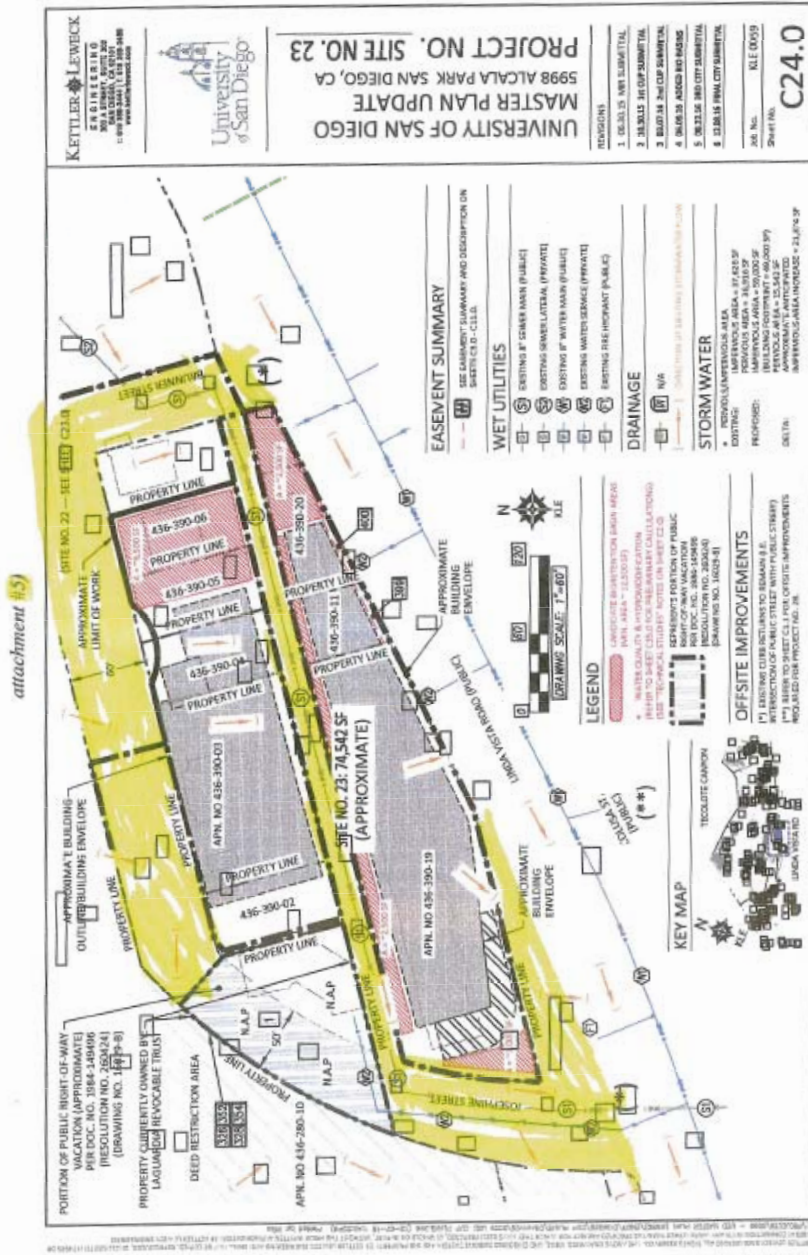
- Intersection of Linda Vista Road and Josephine Street (Project Site No. 23): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard contiguous sidewalk; existing public street where Josephine Street terminates at Linda Vista Road would be vacated and the un-signalized "T" Intersection would be closed. A new driveway and signalized intersection would be installed at the time of site construction.
- Intersection of Linda Vista Road and Brunner Street (Project Site No. 23): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard contiguous sidewalk; existing public street where Brunner Street meets the north side of Linda Vista Road would be vacated and the un-signalized "T" intersection would be closed. A new driveway and signalized intersection would be installed at the time of site construction.
- Segment of Linda Vista Road between Josephine Street and Brunner Street (Project Site No. 23): City standard bus stop concrete slab (length of approximately 150 linear feet) would be installed.
- Intersection of Linda Vista Road and Torero Way (Project Site No. 30): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard commercial driveway apron, and curb, gutter, and sidewalk.
- Segment of Via Las Cumbres fronting gated private campus driveway (Project Site No. 30): Existing private driveway and emergency access to remain; curb ramp to be installed per City standards.

3.3.6 Design Guidelines

The Master Plan Update includes general and detailed Design Guidelines that provide the primary means for consistently implementing the campus landscape and recognizable architectural character. The Design Guidelines provide direction on the physical development of the campus and support key overall planning principles and framework plans for different areas of campus as established in the Master Plan Update. More specifically, the Design Guidelines document frames the aesthetics of campus development by describing and illustrating site planning, vehicular and pedestrian circulation, parking, architecture, landscape, lighting, and signage as related to existing campus and future development. Future campus planners, architects, landscape architects, and designers of lighting, signs, and other amenities, as well as maintenance personnel, would use the USD Design Guidelines to guide their campus-related work. The Design Guidelines include General Design Guidelines and Focus Area Guidelines, as well as Sustainability Guidelines, as described below.

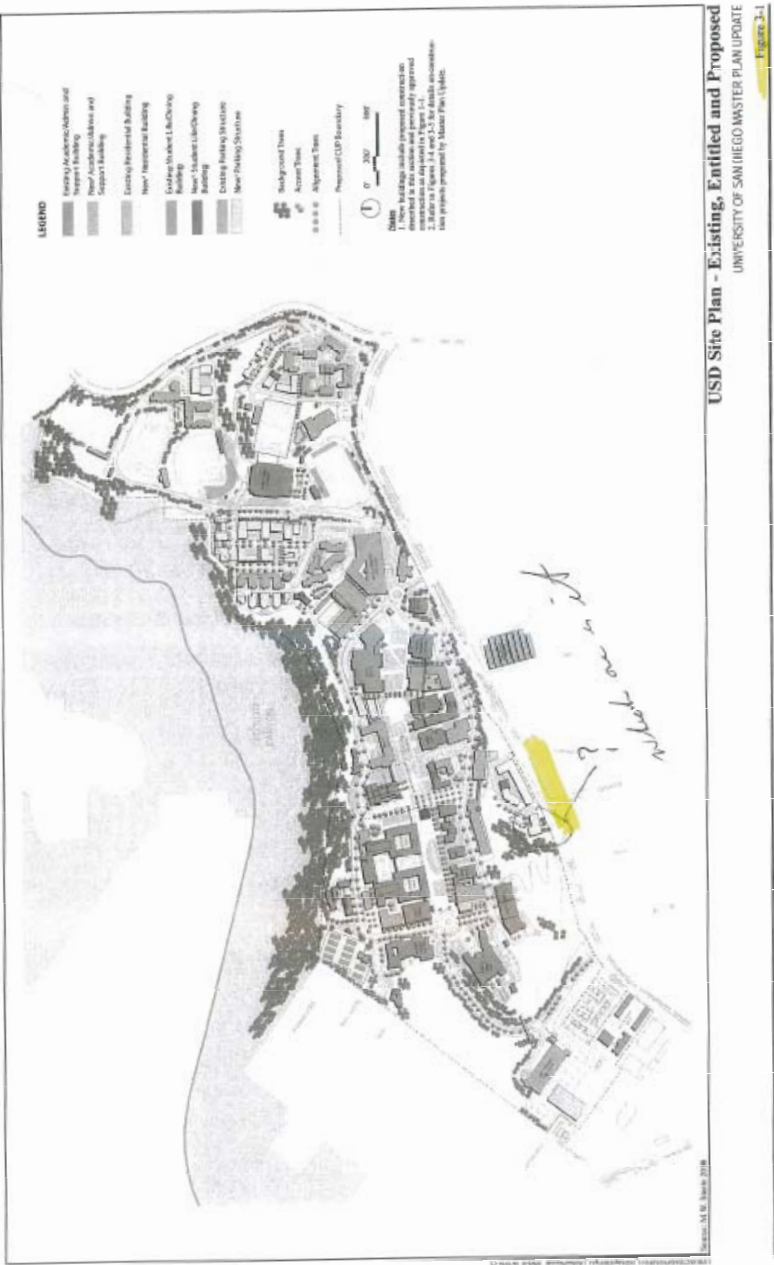
General Design Guidelines

The General Design Guidelines apply campus-wide and were created to guide the quality of development of each project site as well as assist with compliance with the Master Plan Update. The



J-34

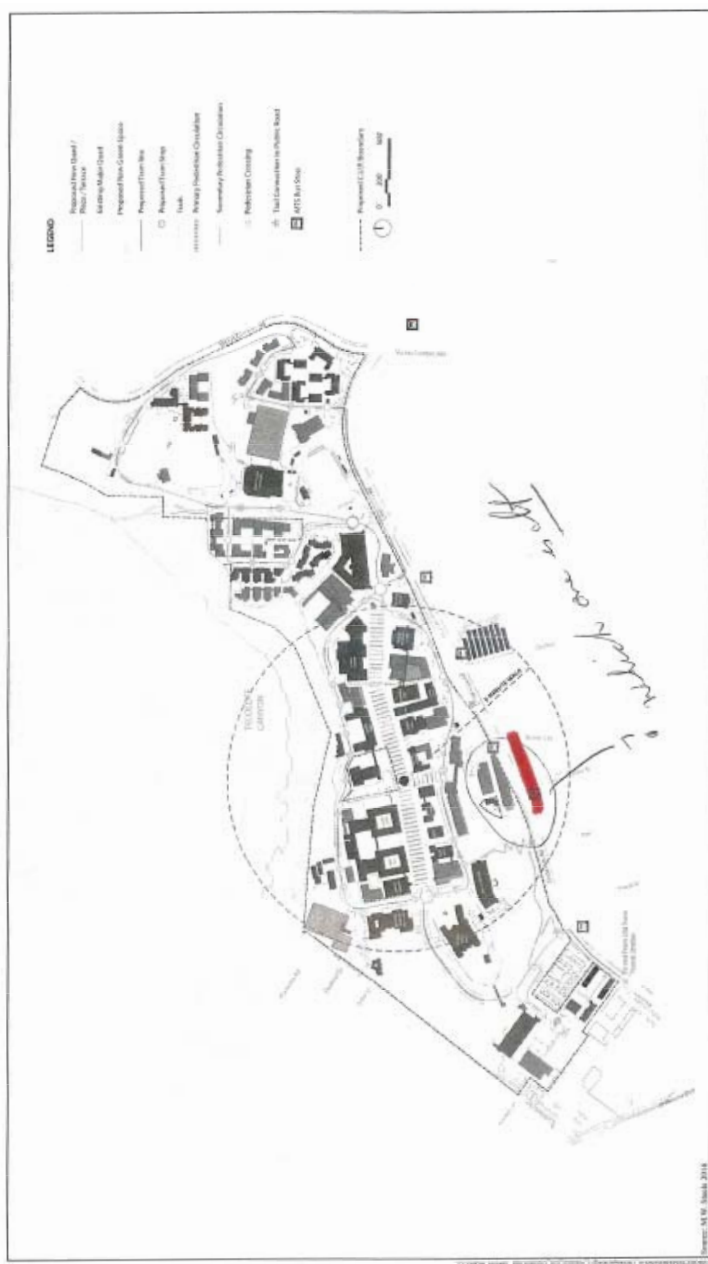
attachment #6



J-34 Comments noted; please refer to response to comment J-3.

Pedestrian and Tram Circulation and Connectivity

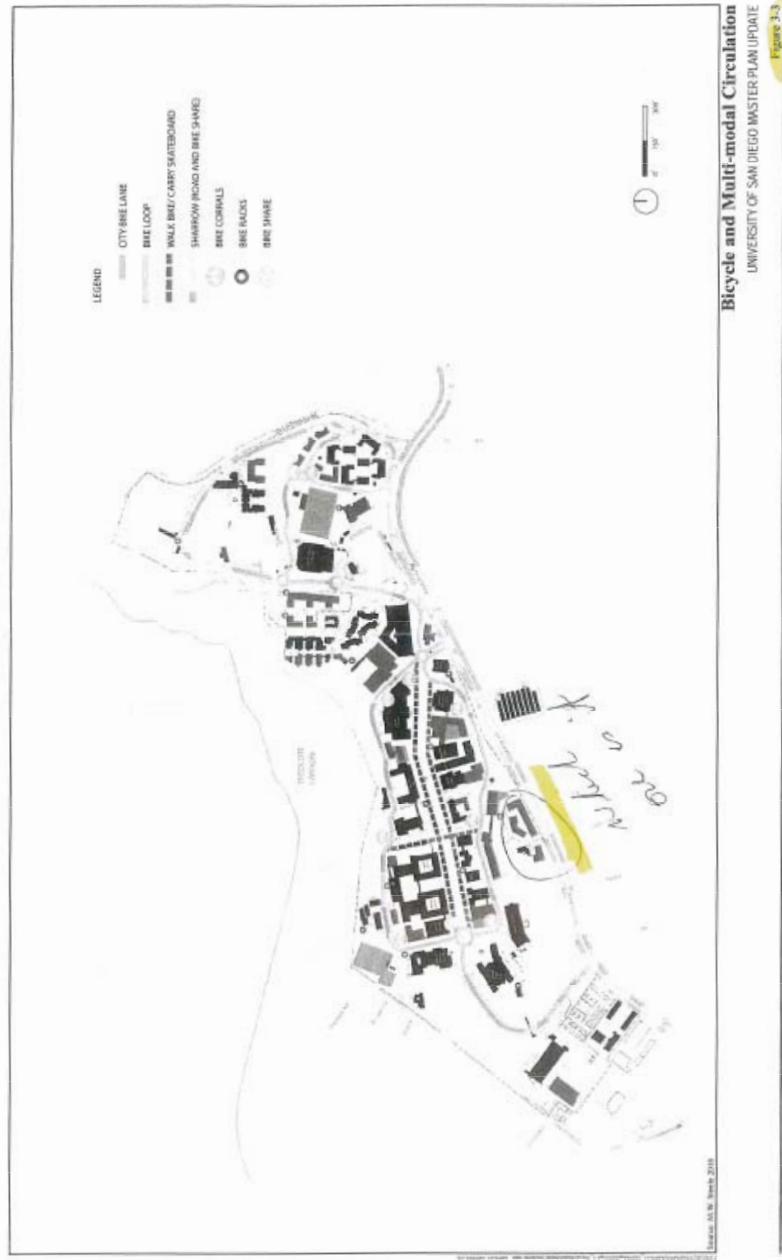
Figure 3-2



J-35 Comments noted; please refer to response to comment J-4.

J-36

466

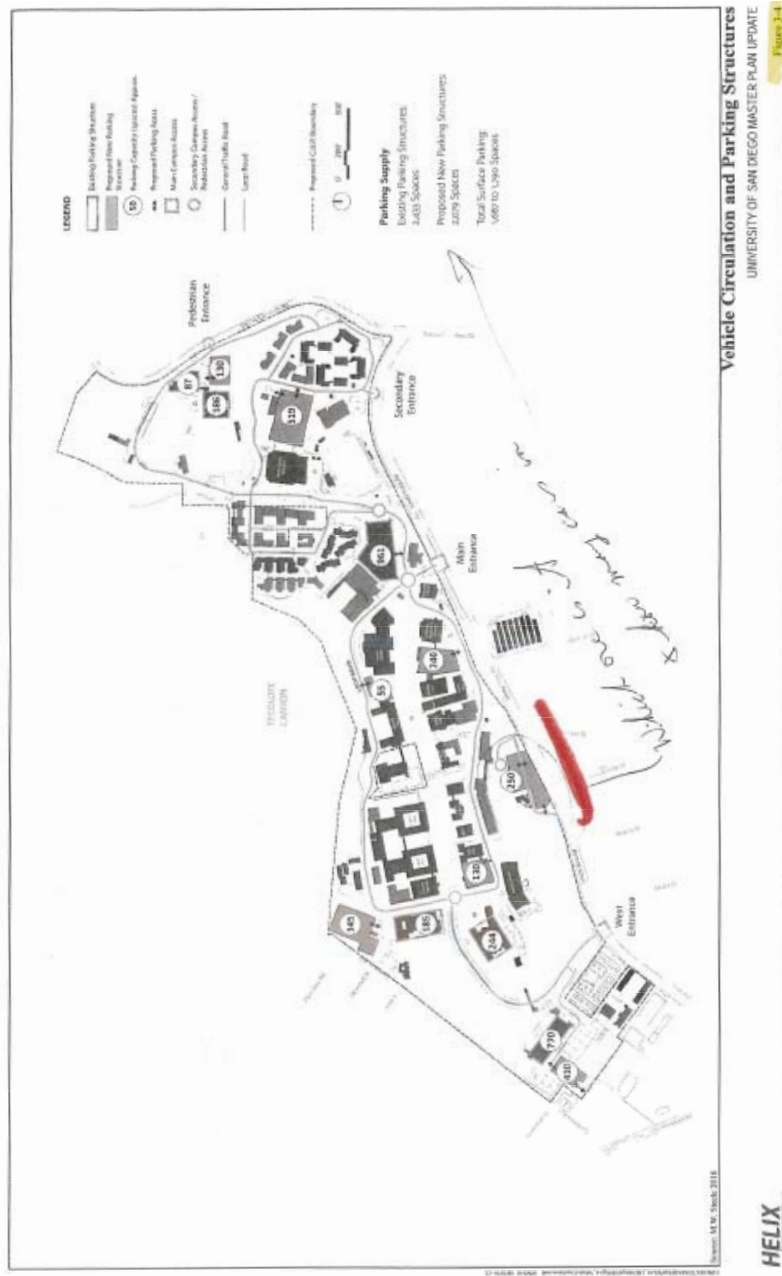


J-36 Comments noted; please refer to response to comment J-4.

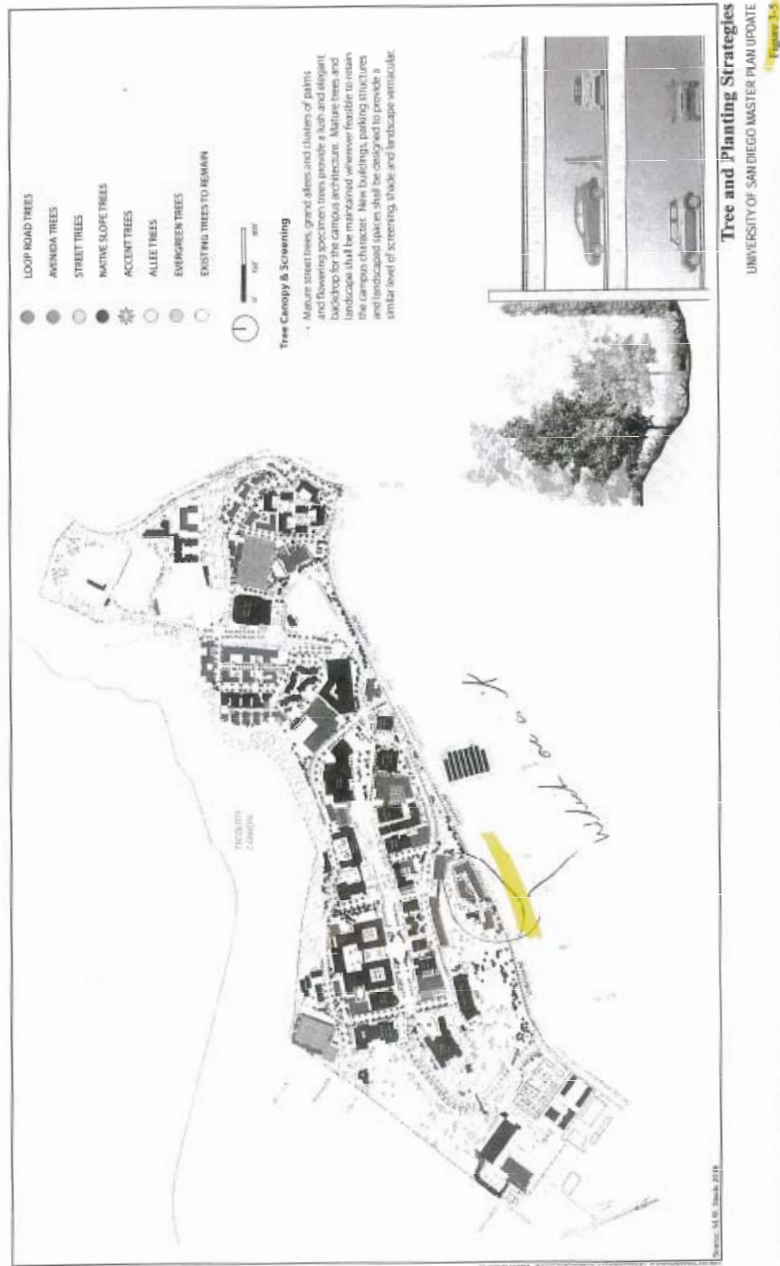
Vehicle Circulation and Parking Structures

Figure 14

Figure 3-4



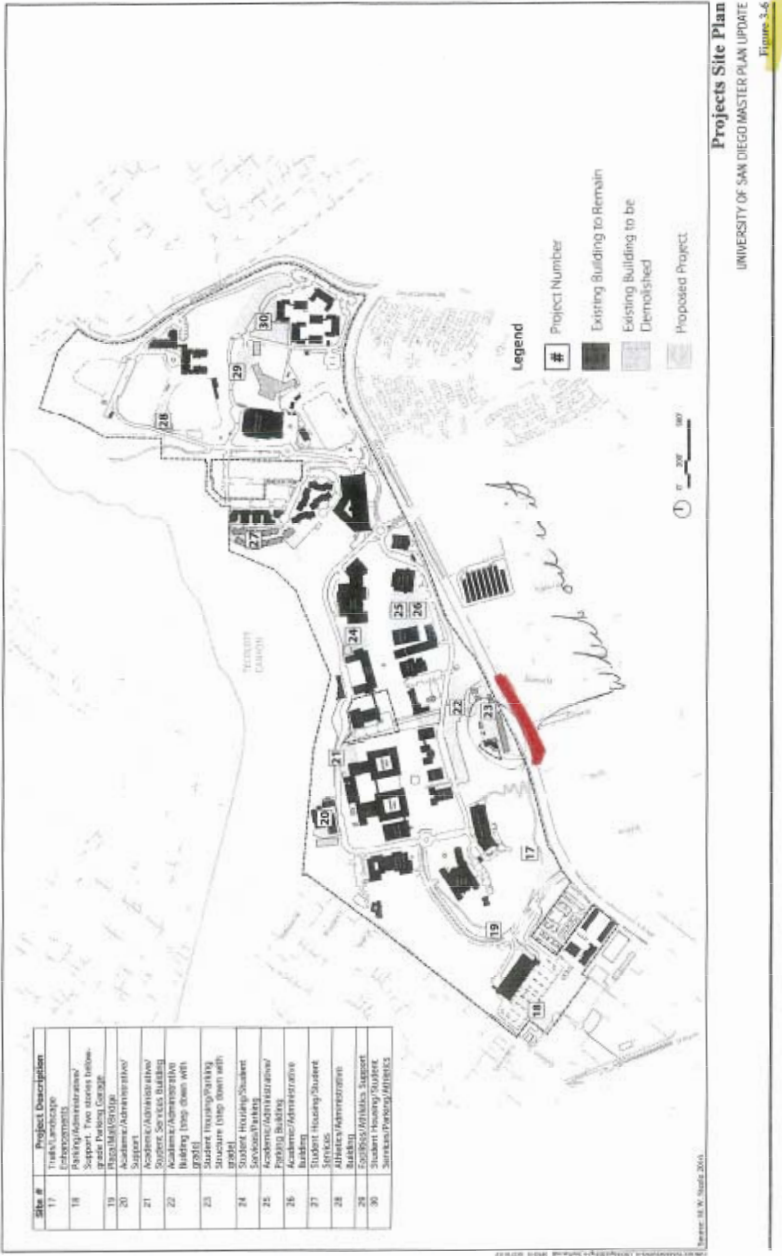
J-37 Comments noted; please refer to response to comments J-3 and J-4.



J-38 Comments noted; please refer to response to comment J-10.

J-39

1.66



J-39 Comments noted; please refer to response to comment J-4.

J-40

*See page 57
for staff
comment*

SDH No. 1993121032; Project No. 417090
Subsequent Environmental Impact Report

attachment #7

Section 3.0
Project Description

prior permit. City staff will recommend approval of the construction proposal if it falls within the parameters of the prior approval. A SCR decision for the USD Master Plan Update proposals would be at Staff level (i.e., Process 1). Substantial conformance shall be determined based on the locations, descriptions, and building areas specified on the construction site maps and in the construction site matrices contained within the Master Plan Update. As an alternative to submitting for SCR, USD may choose to include their proposed changes as part of a complete construction permit application (building permit, grading permit, public improvement permit, etc.).

Per the current CUP/RPO Permit, City staff may make one of the following determinations at the conclusion of the SCR process:

- Find the construction proposal meets the criteria in the permit, the EIR certified with the permit (i.e., the SEIR), and the Master Plan and Design Guidelines. As long as the impacts of the construction proposal were analyzed in the SEIR, and the proposal is within a reasonable range of the overall building envelope specified by the Master Plan and CUP and SDP, no further environmental review is required and administrative approval would be granted.

OR

- Find the proposal is not in substantial conformance with the permit.
- Require a site-specific permit amendment for a proposal not in conformance with the permit.
- If necessary, require a site-specific environmental review for a proposal not in conformance with the certified SEIR.

3.5 Discretionary Actions

The SEIR is intended to provide documentation pursuant to CEQA to cover all local, regional, and state permits and/or approvals which may be needed to implement the proposed Master Plan Update. The anticipated discretionary approvals are summarized below.

3.5.1 Conditional Use Permit Amendment

A CUP would be required to replace and amend the existing permit (as currently amended) and allow for the continued institutional use within the residential zone.

3.5.2 Site Development Permit

The SDP would allow the campus to impact Environmentally Sensitive Lands (ESL), specifically sensitive biological resources (i.e., 0.5 acre of upland habitat and Multiple Species Conservation Program (MSCP) covered species), and 0.3 acre of naturally occurring steep slopes. No impacts to wetland resources would occur. The SDP would provide authorization to USD, as a third-party beneficiary, for impacts to coastal sage scrub and covered species under the MSCP. ESL Findings would be required for SDP approval.

USD Master Plan Update

3-16

City of San Diego
January 2017

J-40 Comments noted; please refer to response to comment J-4.

J-41

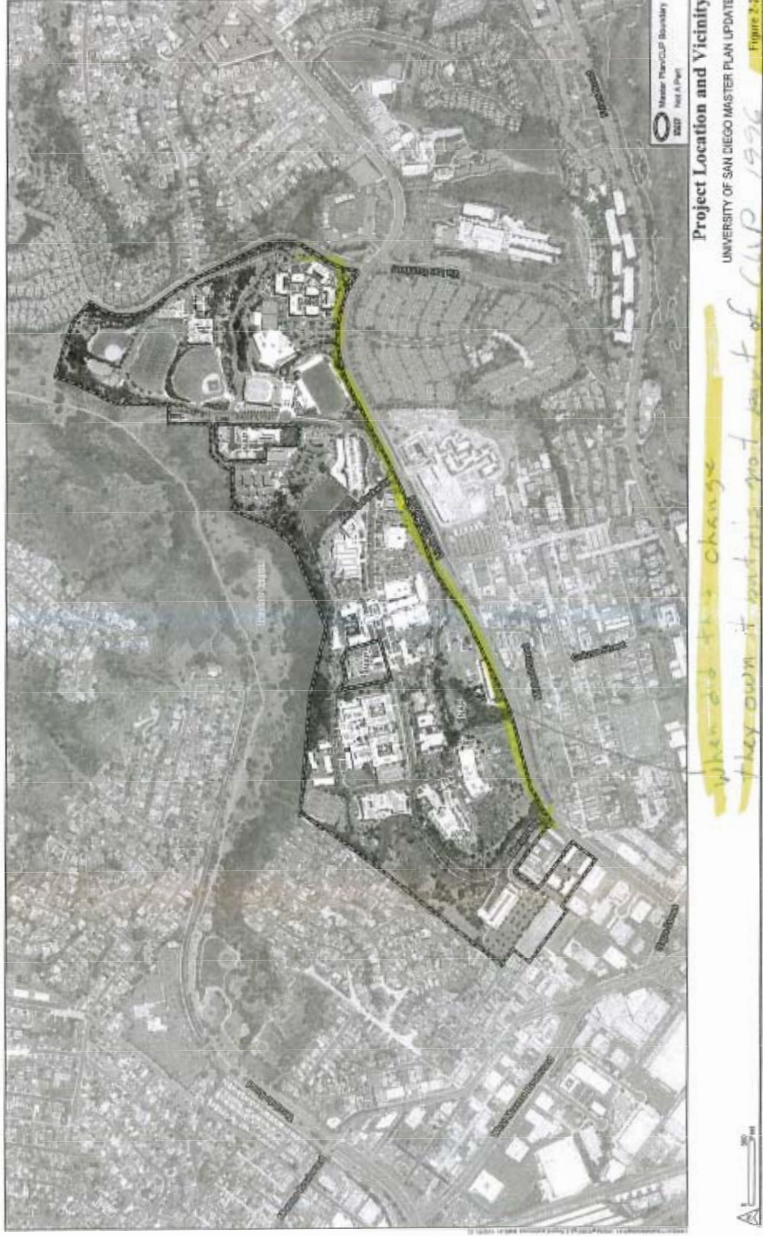
?

J-41 Comments noted; please refer to response to comment J-21.

*is this to permit
a pending structure on a
residential zone*

J-42

attachment # 8



J-42 Comments noted; please refer to response to comment J-4.

On Tue, Jan 17, 2017 at 12:55 PM, Mama LaGuardia <jelaguardia@hotmail.com> wrote:

attachment # 9

Dear Ky,

I think the project is looking good, and I don't really have a problem; but I need some clarification. I'm sorry I cannot do this in person; maybe I can meet with you in a couple weeks. In many places the proposed Master Plan, Final Submittal DRAFT December 8, 2016, refers to Josephine Street on pages 21 through 29 and 33 pretty much up to 69, but there's no exhibit for Josephine Street. According to the history and your previous draft exhibit C 24.0 is correctly shown as an existing entity, but not identified. Josephine Street is a boundary Street dedicated by the developer for the Silver Terrace subdivision from the 1800s. This was well before the University was even contemplated. That means if the street is vacated, it reverts back to the original parcel to which it is attached. I have all the documentation on this from when I did the street vacation. It is a paper street that services the subdivision to make it legal. I was not allowed to close it and use the alley as access because the alley is a 19 foot alley. In order to be a named alley and substitute as legal Josephine street access for our subdivision it would have to be 1 foot wider, a 20 foot one-way street, since there was no where to get the added 1 foot. So the Josephine Street remained on the north side of the properties and is called a paper street which cannot be altered. I was not even allowed to plant a victory garden in it. So I'm trying to understand how the alterations in the middle of the Josephine street are acceptable. How is it that the alley appears to be becoming a legal street? Are they going to widen the alley to make it acceptable. And, I noticed on the new page 113 K, you do recognize that my lot would regain the wedge that was taken during the street vacation in order to make a cul-de-sac, which appears not to be needed. This is great. I hope I understand this correctly, that my two property lines would be 160 x 160 with the curved portion at the Northwest. I would appreciate some clarification on this. I am also a little curious and concerned about the proposed parking garage so close to my bedrooms, with their attendant fumes and noise. Has the subject property been rezoned or included in the CUP? Is the cart preceding the horse?

Thank you,
Jinger LaGuardia
5701 Josephine St
San Diego, Ca. 92110
Ph. [801-979-1997](tel:801-979-1997)

Attachments

cc: **James McGuirk**
Council Representative | Clairemont & Linda Vista | MTS
Councilmember Lorie Zapf | District 2 | City of San Diego

John S. Fisher, RLA No. 2995
Development Project Manager
Development Services Department
City of San Diego

COMMENTS

RESPONSES

attachment # 10.

From: Ky Snyder <kysnyder@sandiego.edu>
Sent: Thursday, January 26, 2017 3:27 PM
To: Mama LaGuardia
Cc: JMcGuirk@sandiego.gov; John Fisher
Subject: Re: Final Submittal DRAFT December 8, 2016

I hope the following answers your questions. Please let me know if you have anything further.

The document refers to Josephine Street on several occasions in reference to the area around project 23 but that does not mean the street itself. For example, it says "consider the Josephine Street housing site as an opportunity for more efficient housing...").

- The master plan does not contemplate changing the configuration, location and direction of Josephine Street (in fact, we redesigned project 23 to conform to the existing conditions)
- Project 23 does allow for a garage. It would be partially below-grade and screened per the master plan design guidelines and focus area guidelines, section K.
- Technically, the CUP is not a rezone. No property will be rezoned as part of this process.
- The only easement vacations we are proposing are to utility easements on the campus, and not street vacations.

Ky

COMMENTS

RESPONSES

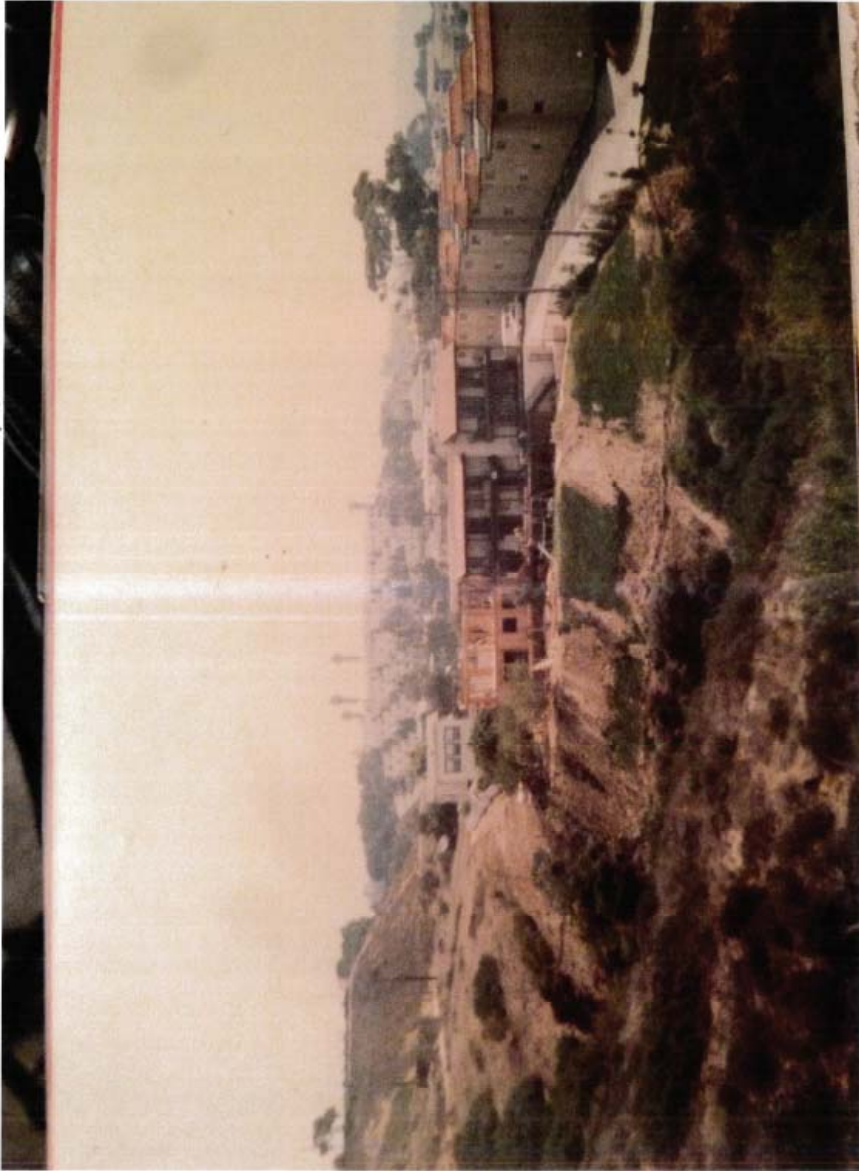
Attachment # 11



COMMENTS

RESPONSES

A the limit #11a



SCH No. 1993121032; Project No. 417090
Subsequent Environmental Impact Report

attachment section 7.0 page 7-6 # 12

Section 7.0
Other CEQA Sections

semi-permeable strata, with the presence and/or extent of such groundwater bodies typically associated with and influenced by seasonal precipitation and local irrigation.

While a pre-development (design-level) geotechnical investigation cannot be prepared at this time due to the lack of design detail required to conduct the study, all of the projects proposed under the Master Plan Update would be required to have a pre-development (design-level) geotechnical investigation prepared pursuant to the City of San Diego Development Services' Information Bulletin 515. The geotechnical investigation report(s) should be prepared in accordance with the City's "Guidelines for Geotechnical Reports." A summary of potential geologic hazards on the USD campus is provided below.

Surface Fault Rupture

The Project Geotechnical Feasibility Evaluation identifies a low potential for fault rupture hazards on the USD campus, with the exception of the area in the vicinity of Project Site No. 18 (Parking/Administrative/Physical Plant), which exhibits a moderate potential related to a suspected fault adjacent to this site (Kleinfelder 2016). The potential occurrence, location and activity of this fault is not known at this time since this feature is not shown on published geologic maps and is only suspected from Kleinfelder's analysis of vintage aerial photography, which indicates possible historical fault related features in the modern landscape. The suspected fault is mapped 50 feet from the proposed building location. The Project Geotechnical Feasibility Evaluation also notes that the closest mapped active faults and associated Earthquake Fault Zones designated by the California Geological Survey (CGS) are located approximately two miles to the northwest along the Rose Canyon Fault Zone. Based on the noted occurrence of faulting in the immediate vicinity of Project Site No. 18, a site-specific fault investigation would be conducted at the site as part of the noted design-level geotechnical investigation prepared for the Project (in accordance with applicable City guidelines). Specifically, the analysis would verify both the potential occurrence of faulting and the associated activity status if faulting is encountered. If active faulting is identified, associated standard measures, such as building setbacks, would be required to remediate potential impacts and ensure conformance with applicable regulatory requirements. Incorporation of required design features, such as setbacks, into the construction-level plans for Project Site No. 18 and compliance with the California Building Code and other applicable regulatory standards would reduce risks to acceptable levels and ensure that less than significant surface fault rupture impacts would occur.

Seismic Ground Shaking

As noted above, the USD campus is subject to ground shaking from earthquake events along local or regional faults, including the Rose Canyon and Elsinore fault zones. While this could potentially result in related impacts to proposed facilities, individual project implementation would incorporate appropriate design and construction measures to accommodate projected seismic loading, pursuant to applicable industry/regulatory requirements (e.g., City and California Building Code [CBC] standards), recommendations from the Project Geotechnical Feasibility Evaluation, and pertinent updates from the previously noted design-level geotechnical investigation. Specifically, this may involve standard efforts such as incorporating applicable seismic loading factors into the design of facilities such as structures, foundations/slabs, pavement and utilities; related activities including remedial grading (e.g., removing/replacing and/or reconditioning unsuitable soils); appropriate manufactured slope, retaining wall and drainage design; and proper fill composition/placement

J-43 Comments noted; please refer to response to comment J-25.

attachment #13

DEVELOPMENT AND PLANNING HISTORY

Housing development in Linda Vista began with the Silver Terrace subdivision in the late 1880s. Development continued at a moderate pace through the first four decades of the 1900s. However, the community's greatest growth spurt occurred between 1941 and 1945. During World War II, the entire region faced an unexpected defense boom that resulted in an enormous influx of residents to staff the burgeoning defense industry. Housing shortages became so acute that factory officials reported an inability to recruit sufficient labor. As a result, the federal government began to build housing in San Diego, the largest of which was in Linda Vista. Three thousand dwelling units were built over a period of one year using mass production techniques.

Planned features of the new community included view lots, infrastructure, and landscaping. However, problems were encountered with the water and sewer systems being inadequate citywide, and a shortage of funding for completion of the landscaping, schools, library, and commercial uses. Overcrowded conditions were a problem from the start.

The Linda Vista Shopping Center was dedicated in 1942 by Eleanor Roosevelt as the nation's first shopping center. Extensive redevelopment of the center was conducted during the 1970s.

Still apparent are the numerous pathways and alleyways leading from surrounding residential neighborhoods to Linda Vista Plaza. Some of the pathways are still in use, while others have been built upon or removed.

The University of San Diego (USD) has been a landmark of the community since its construction in the 1950s. USD is a private university with an enrollment of approximately 6,000 students. Multiple family development accelerated in the 1960s through 1980s in areas adjacent to USD, along Friars Road, and in areas overlooking Tecolote Canyon.

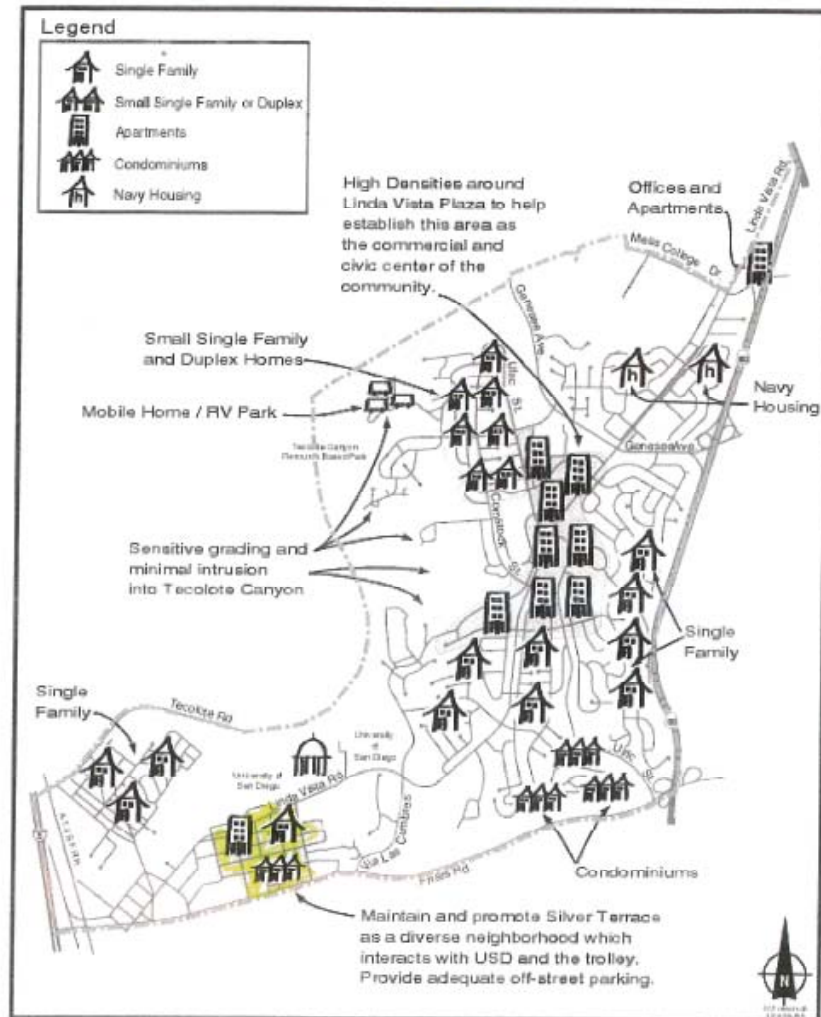
The late 1970s and 1980s brought an influx of Indochinese immigrants into Linda Vista. The immigrants include Vietnamese, Laotian, Hmong, and Cambodian people. Linda Vista remains an ethnically diverse community, with a population (as of 1990) that is 62 percent white, 22 percent Asian, 18 percent Hispanic, and 6 percent black.

The first community plan prepared for Linda Vista was the Morena area plan, covering about 380 acres. Linda Vista was included in the 1970 Kearny Vista Community Plan. Successes of the plan included the acquisition of Tecolote Canyon for open space, a housing improvement program, and the formation of a redevelopment project area for Linda Vista Plaza. The redevelopment area remains in effect today.

The first comprehensive plan for the enlarged community was the 1983 Linda Vista Community Plan. This plan calls for the intensification of land uses along Friars Road and near Linda Vista Plaza, the University of San Diego, and the Morena industrial area. Many of the rezonings recommended to implement that plan were not adopted.

A series of amendments to the Linda Vista Community Plan have been approved by the City Council since the plan's adoption. One amendment requires development along Friars Road to

Attachment #14



Residential Concept

Linda Vista Community Planning Area

City of San Diego • Community and Economic Development

Figure 5

COMMENTS

RESPONSES

attachment # 15

For LINDA VISTA PLANNING GROUP - PUBLIC MEETING -

Monday, April 25th, 2016

5:30 – 7:30 P.M.

Linda Vista Library

2160 Ulric Street, San Diego, CA 92111

BOARD MEMBERS : Noli Zosa, Lauree Camarato, Tisha Rocha, Jo-Ann Carini; Margarita Castro; Dottie Perez, Vicki Van Dyk, Keith Warner, Howard Wayne, Kimberly Weber, Kim Heinle

Subject: Existing Silver Terrace Subdivision not shown on USD Updated Master Plan NO 4170980 CUP

Dear Ms. Carini,

Would you please present my concerns about the USD updated master plan, PTS NO. 417090 conditional use permit _____, based on master plan from 1996 CUP PRO permit No. 92-0568 to the Linda Vista planning board this evening. I am unable to make arrangements for a caregiver to stay with my husband. Therefore I am unable to attend.

The USD 1996 update Master Plan recognizes Silver Terrace subdivision; see Page 18 describing Silver Terrace residential subdivision as the oldest, since 1880s. The 1996 update, Page 28 figure 6 shows the boundaries of the subdivision. Page 29, neighborhood 15, Silver Terrace again refers to it as a single-family to multifamily area. Today it is currently functioning as a residential neighborhood with some parcels that are owned by the University, and some residents that may attend the University, but it is not part of their 1996 master plan update.

The currently proposed update implies that the Silver Terrace subdivision was preapproved as part of their 1996 master plan, and this is incorrect. I am requesting that this part of the update be removed, until all of Silver Terrace, our neighborhood, is officially owned by the University. Then they have the right to put the CUP over our home or subdivision. The current proposal would destroy our neighborhood and access to my residence of 40 years. In 1976 the university did not own any of the homes or lots in our neighborhood.
Thank you.

Jinger LaGuardia
5701 Josephine St.
San Diego Ca. 92110
619 296-3392
cell 801- 979-1997

cc. City Attorney Jan Goldsmith, Mayor Kevin L Faulconer, Supervisor Ron Roberts, Council President Sherri Lightner, Councilmember Lorie Zapf, Councilmember Todd Gloria, Councilmember Myrtle Cole, Councilmember Mark Kersey, Councilmember Chris Cate, Councilmember Scott Sherman, Councilmember David Alvarez, Council President Pro Tem Marti Emerald, Community Representative James McGuirk

COMMENTS

RESPONSES

Attachment # 16

A copy of the email I sent out, for your records.
Thank you

Jinger LaGuardia
801-979-1997 cell best #
619-296-3392 home

From: jelaguardia@hotmail.com
To: jmcguirk@sandiego.gov
CC: kevinfaulconer@sandiego.gov; cityattorney@sandiego.gov; sherril.ightner@sandiego.gov; loriezapf@sandiego.gov; toddgloria@sandiego.gov; myrtlecole@sandiego.gov; chriscate@sandiego.gov; scottsherman@sandiego.gov; davidalvarez@sandiego.gov; martiemerald@sandiego.gov; markkersey@sandiego.gov; ron-roberts@sdcounty.ca.gov
Subject: follow up to phone call
Date: Wed, 27 Apr 2016 14:02:01 -0700

Mr. James McGuirk
Council Representative , Clairemont & Linda Vista ,
Councilmember Lorie Zapf | District 2 | City of San Diego
Subject: follow up to phone call, CUP # 4170- 90

Dear James,

Thank you for taking the time to talk to me yesterday.
I did follow up with the appraisal company and, yes we are the next property to be worked on. They have the credentials and expertise to let us all know what the fair market value is. Then, hopefully we can move forward, with the University and get fair market value.

It is interesting when you look up the definition of fair market value, "the amount for which property would sell on the open market if put up for sale." This is distinguished from "replacement value," which is the cost of duplicating the property. Real estate appraisers will use

COMMENTS

RESPONSES

5/6a

"comparable" sales of similar property in the area to determine market value, adding or deducting amounts based on differences in quality and size of the property and is unencumbered," and, this is most interesting, "free of undue pressure to trade." When you look up encumbered, read: "A property owned by one party on which a second party reserves the right to make a valid claim." This is my concern; by approving the plan as it is, before the University acquires full ownership of the subdivision, you definitely are limiting my fair market value. Our home of 40 years would be in the middle of dormitories with much more noise and people not conducive for a single-family lifestyle. This would definitely encumber and devalue my property, and I would not receive fair market value. The value would be based on their decision and determination only.

The key in this very important factor is that you said "they are not going to do this for another 5 to 10 years;" so what is the big rush?

They do not need to close our street. The boundary Street from the original single-family Silver Terrace subdivision existed 50+ years before USD. So, again I request that acquisition of this portion of Silver Terrace subdivision be recognized as their development goal. This portion was not approved, or put under the CUP in 1996 update. It should not be approved until they acquire all the property. What you propose to do is tantamount to an eminent domain procedure, and for a private entity. Please leave our home as is, with legal deeded street access and public services, not a home on the USD campus with a much less desirable easement access.

The City cannot grant the University the right to encumber and steal the value of our home.

Thank you,
Jinger LaGuardia

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

SAN DIEGO, CALIFORNIA



Final Subsequent
Environmental Impact Report
SCH No. 1993121032; Project No. 417090



May 2017

Prepared for:
City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

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USD Master Plan Update

Final Subsequent Environmental Impact Report

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AB	Assembly Bill
ACM	asbestos containing material
ADD	Assistant Deputy Director
ADRP	Archaeological Data Recovery Program
ADT	average daily traffic
AFY	acre-feet per year
AGR	agricultural supply
AIA	Airport Influence Area
APCD	Air Pollution Control District
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
ASF	assignable square feet
ATS	advanced treatment systems
BAT	best available technology economically achievable
BCT	best conventional pollutant control technology
BI	Building Inspector
BIOL	biological habitats of special significance
BMI	benthic macroinvertebrate
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
City	City of San Diego
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide

COD	chemical oxygen demand
COMM	commercial and sport fishing
CPIOZ	Community Plan Implementation Overlay Zone
CPTED	Crime Prevention through Environmental Design
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CSMP	Construction Site Monitoring Program
CSVR	Consultant Site Visit Record
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DSD	Development Services Department
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EAS	Environmental Analysis Section
EIR	Environmental Impact Report
EMF	electromagnetic field
EPIC	Energy and Policy Initiatives Center
ESA	Endangered Species Act
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
EST	estuarine habitat
FAA	Federal Aviation Administration
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FTE	full-time equivalent
GHG	greenhouse gas
GLA	gross leasable area
GSF	gross square feet
GWh	gigawatt hour
H ₂ S	hydrogen sulfide
HA	hydrologic area
HAP	hazardous air pollutant
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HELIX	HELIX Environmental Planning, Inc.
HOA	Homeowners' Association
HRA	health risk assessment
HRG	Historical Resources Guidelines
HSA	hydrologic subarea

HU	hydrologic unit
HVAC	heating, ventilation, and air conditioning
I-	Interstate
IBI	Index of Biotic Integrity
IEM	Iowa Environmental Mesonet
IND	industrial service supply
IRP	Integrated Resources Plan
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
KLE	Kettler-Leweck Engineering
kV	kilovolt
LBP	lead-based paint
LDC	Land Development Code
LEED	Leadership in Energy and Environmental Design
L _{EQ}	one-hour average sound level
LID	low impact development
LLC	Living Learning Community
LLG	Linscott, Law & Greenspan Engineers
LOS	level of service
MAR	marine habitat
MBAS	methylene blue active substances
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MEI	maximally exposed individual
MEP	maximum extent practicable
mgd	million gallons per day
MHPA	Multi-habitat Planning Area
MIGR	migration of aquatic organisms
MLD	Most Likely Descendent
MLS	Mass Loading Station
MMC	Mitigation Monitoring Coordination
MND	Mitigated Negative Declaration
mph	miles per hour
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
MUN	municipal and domestic supply
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NCWRP	North City Water Reclamation Plant
NRMP	Natural Resource Management Plan

NO	nitrogen oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRDC	Natural Resources Defense Council
NRMP	Natural Resources Management Plan
NSLU	noise-sensitive land use
O ₃	ozone
Pb	lead
PDP	Planned Development Permit
PDP	Priority Development Project
PFFP	Public Facilities Financing Plan
PI	Principal Investigator
PM	particulate matter
PRC	Public Resources Code (California)
PROC	industrial process supply
Project	Master Plan Update
projects	campus development described in the Master Plan Update
PUD	Public Utilities Department
PV	photovoltaic
RAQS	Regional Air Quality Strategy
RARE	rare, threatened or endangered species
RE	Resident Engineer
REAP	Rain Event Action Plan
ROG	reactive organic gas
ROW	right-of-way
RPO	Resource Protection Ordinance
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SCR	Substantial Conformance Review
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SDP	Site Development Permit

SDREO	San Diego Regional Energy Office
SEIR	Subsequent EIR
SHELL	shellfish harvesting
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SPWN	spawning, reproduction and/or early development
SR	State Route
SRRE	Source Reduction and Recycling Element
SWIS	Solid Waste Information System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
T-BACT	Toxics-Best Available Control Technology
TDM	Transportation Demand Management
TDS	total dissolved solids
TIA	Transportation Impact Analysis
TMDL	total maximum daily load
TSS	total suspended solids
TWAS	Temporary Water Assessment Station
TWLT	two-way left-turn lane
URF	unit risk factor
USACE	U.S. Army Corps of Engineers
USD	University of San Diego
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGBC	U.S. Green Building Council
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
V/C	volume to capacity
VHFHSZ	Very High Fire Hazard Severity Zone
VOC	volatile organic compound
WARM	warm freshwater habitat
Weston	Weston Solutions, Inc.
WILD	wildlife habitat
WLA	waste load allocation
WMP	Waste Management Plan
WQBEL	water quality based effluent limitation
WQCP	Water Quality Control Plan
WQTR	Water Quality Technical Report
WRCC	Western Regional Climate Center

WS	waters of the State
WSA	Water Supply Assessment
WUS	waters of the U.S.

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S.0 SUMMARY

S.1 Project Synopsis

This summary provides a brief synopsis of the Subsequent Environmental Impact Report (SEIR) for the University of San Diego (USD or University) Master Plan Update of the USD 1996 Master Plan. This includes (1) a description of the Master Plan Update and its components; (2) the results of the environmental analysis contained within this SEIR; (3) the major areas of controversy and issues to be resolved by decision-makers; and (4) the alternatives that were considered. This summary does not contain the extensive background and analysis found in the SEIR. Therefore, the reader should review the entire SEIR to fully understand the Master Plan Update and its environmental consequences.

As CEQA Lead Agency, the City of San Diego (City) determined that proposed revisions to the 1996 Master Plan outlined below and in detail in Section 3.0, *Project Description*, and/or the circumstances surrounding its implementation require revisions to the existing City entitlements and certified CEQA document pursuant to Section 15162(a) of the State CEQA Guidelines. CEQA Guidelines Section 15162 provides that a SEIR is warranted if the Lead Agency determines, among other things, that substantial changes have occurred to a project that will have one or more significant effects not discussed in the previous EIR or the revised project has the potential to increase the severity of significant impacts in the previous EIR. In the instance of the Master Plan Update (Project), the amount of campus development and student enrollment would increase beyond levels that were previously identified in the 1996 Master Plan and contemplated in the 1996 Master Plan Final Environmental Impact Report (FEIR), potentially resulting in new and/or substantially more severe impacts.

S.1.1 Project Location and Setting

The Project is located at the USD campus, which occupies approximately 180 acres of land devoted to University-related uses in the central portion of the City, in the community of Linda Vista. The campus is located five miles east of the Pacific Ocean, four miles north of downtown San Diego, approximately 0.5 mile east of Interstate (I-) 5 and 0.5 mile north of I-8. Mission Bay Park occurs approximately 0.75 mile to the west and San Diego River flows about 0.5 mile to the south. Tecolote Canyon Natural Park forms the northern border of the campus; Morena Boulevard is located to the west, with Via Las Cumbres bordering the campus on the east, and Linda Vista Road to the south. The USD campus is within 0.5 mile of the Morena/Linda Vista Trolley Station, and is approximately 0.9 mile north of the Old Town Transit Center.

The majority of the University property is developed and supports campus facilities (academic buildings, sports facilities, parking lots, etc.) and ornamental landscaping. USD current enrolls 7,000 full-time equivalent (FTE) students consisting of both undergraduate and graduate students. The buildings on the USD campus are designed and built in a distinctive 16th Century Spanish Renaissance architectural theme with plazas, gardens, courtyards, arcades and the Marian Way Mall and Colachis Plaza, as specified in the 1996 Master Plan.

Academic uses are generally concentrated on the west end of campus, with professional programs arranged in a line of buildings that stretches across the south side of Marian Way and Colachis Plaza and almost to the Marian Way entrance of campus. The eastern end of campus is predominantly used for residential and athletic purposes. A main defining element of the campus is the pedestrian mall along Marian Way. In contrast to the highly manicured landscaping of the central campus, the surrounding landscape is natural and rugged, particularly along the southern edge facing Linda Vista Road and the northern edge that enters Tecolote Canyon.

Topography on site ranges from approximately 50 feet above mean sea level (AMSL) in the western portion of the campus to approximately 260 feet AMSL in the eastern portion. A total of approximately 16.2 acres of steep slopes occur within the campus property. Natural vegetation, including Diegan coastal sage scrub, maritime succulent scrub, southern willow scrub, southern mixed chaparral, and non-native grassland, comprises approximately 21 acres of the 180-acre campus. Of the 180 acres, 7.6 acres fall within the Multi-habitat Planning Area (MHPA), which is the City's Multiple Species Conservation Program (MSCP) Preserve.

The Linda Vista community is highly urbanized and primarily residential, with other land uses consisting of light industrial and commercial in the Morena Boulevard area, retail uses in central Linda Vista, and the institutional uses of USD. Tecolote Canyon Natural Park contains undeveloped regional open space to the north and is enveloped by the MHPA.

S.1.2 Project Description

USD received approval of its existing Master Plan, including Design Guidelines, in 1996 to guide the phased buildout of the campus through the year 2030. Concurrent with the City's approval of the 1996 Master Plan, Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) Permit No. 92-0568 was issued to allow the campus to construct on 23 projects outlined in the 1996 Master Plan and expand student population to 7,000 FTE students. In conjunction with the Master Plan approval, the City certified the 1996 Master Plan Final Environmental Impact Report (FEIR) (SCH No. 93121032), including its associated technical studies. Over the past 20 years, several CUP amendments and Substantial Conformance Review (SCR) approvals have been granted to the University by the City during the implementation of the 1996 Master Plan. Of the 23 projects identified in the 1996 Master Plan, various improvements and several structures or facilities have been constructed, while 16 projects have received discretionary review approval but have yet to be constructed.

The Master Plan Update provides a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 to 10,000 FTE students over the next 20 years. The Project identifies 14 newly-proposed facility or improvement projects which would allow for the construction of academic/administrative buildings, student housing, student services uses, athletics/athletic support/administrative buildings, parking, pedestrian circulation and landscape improvements not contemplated in the 1996 Master Plan and related FEIR. The phased development of the 14 projects identified in the Master Plan Update would collectively add 471,738 Assignable Square Foot (ASF) of new building space (or the space within a building that can be designated to a particular use) to the campus, including 1,003 student housing beds. This new ASF and housing would be contained within the approximately 922,230 Gross Square Feet (GSF) of

the new or renovated structures proposed by the Project. The GSF reflects the total space within the exterior walls of a building and includes space that is not designated for uses, such as stair cases, elevator shafts, lobbies, etc. The supply of structured parking on campus would increase under the Master Plan Update from 5,384 existing spaces contained in both structures and surface lots to a total parking supply of 6,199 to 6,302 spaces, which would be both in structures (4,512 spaces) and 1,687 to 1,790 in surface lots (refer to Appendix B), from an existing count of 2,433 spaces to a proposed count of 4,512 (increase of 2,079 spaces), while surface parking would be provided to include approximately 1,687 to 1,790 total surface spaces on campus. The project sites, facility types and space needs identified in the Master Plan Update were developed to accommodate projected student population growth to 10,000 FTE. Design Guidelines contained in the Master Plan Update would provide a comprehensive design framework to guide all campus development, including the 16 projects that have received approvals under the existing CUP/RPO Permit but have not been constructed.

In addition to the 14 proposed project sites, the Master Plan Update addresses other potential physical changes that the University could implement on campus to further its vision for optimal development of the campus in the future, specifically pertaining to mobility, circulation, and recreation. These include improvements to the loop road and campus perimeter, pedestrian, trail, and plaza improvements, and an MHPA boundary line correction. Various off-site curb and intersection improvements within public street right-of-way (ROW) along the edge of campus would also be completed in the Master Plan Update.

Discretionary actions for the Master Plan Update include: a new CUP to replace and amend the existing permit (as currently amended), to allow for the continued institutional use within the residential zone, and a Site Development Permit (SDP) would allow the campus to impact Environmentally Sensitive Lands (ESL), specifically sensitive biological resources and steep slopes. The SDP would also allow for deviations from the development regulations related to heights and floor area ratios. Some public utility easements would be vacated and others would be dedicated as part of the new CUP, which would be processed separately as part of future project applications under the Master Plan Update.

Approval of the National Pollutant Discharge Elimination System (NPDES) requirements from the State Water Resources Control Board (SWRCB) would also be necessary to address water quality issues during and post-construction.

S.1.3 Project Objectives

The main purpose of the Master Plan Update is to serve as an updated framework for guiding the physical development of the USD campus over the next 20 years, further achieving the academic goals and objectives of the campus outlined in the 1996 Master Plan. Many of the goals and objectives identified in the 1996 Master Plan FEIR are relevant and applicable to the Project, including those related to:

- Developing new and renovated facilities and capital improvements;
- Renovating or replacing buildings to improve degraded conditions;
- Siting new buildings in locations that offer programmatic advantages;

- Siting facilities to enhance spatial usage of the campus;
- Designing to be compatible with the established style and scale of existing campus structures;
- Improving pedestrian access to, from, and within campus;
- Incorporating accessibility features into existing and new buildings; and
- Providing additional on-campus housing and proximate parking.

Additional or updated Project objectives have been identified by USD as part of the Master Plan Update planning process, including:

- Prioritize the campus mesa for the highest and best use of campus land, especially the academic core, wherein all traditional degree programs will be focused into instructional spaces;
- Ensure adequate space is available for projected academic growth and for an on-campus population to 10,000 FTE students;
- Develop a framework and design guidelines for building and landscape improvements;
- Identify campus development opportunities that balance the University's mission and its financial sustainability;
- Allow the campus to expand internally without altering its physical boundary by infilling surface parking lots and underutilized or vacant campus lands, thereby reducing the need to acquire additional property and reducing potential conflicts with neighbors;
- Guide the intensification of the campus as it grows in a way that does not significantly alter the campus character, but contributes to its enhancement and quality;
- Integrate administrative, academic, housing, athletic, and recreational uses into a cohesive physical campus and campus experience;
- Update the living and learning environment to better reflect campus residential life and academic goals;
- Enhance the student experience and elevate academic excellence on campus;
- Enhance mobility and access throughout the campus and expand mobility options on campus; and
- Guide the creation of an aesthetically pleasing, well-functioning university campus that is integrated within, contributes positively to, and respects the surrounding community.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table S-1, *Summary of Significant Impacts and Mitigation*, located at the end of this section, summarizes the results of the environmental analysis completed for the proposed Master Plan Update. Table S-1 identifies the significant impacts associated with the Project, also includes mitigation measures to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact would be mitigated to below a level of significance with full implementation of the mitigation measures. The mitigation measures listed in Table S-1 are also discussed within each relevant topical area, and fully contained in Section 9.0, *Mitigation, Monitoring and Reporting Program* (MMRP).

S.3 Areas of Controversy

The Project's Notice of Preparation (NOP) was distributed on April 4, 2016 for a 30-day public review and comment period, and a public scoping meeting was held on April 20, 2016. Public comments were received on the NOP that reflect controversy related to several environmental issues. The NOP, comment letters, and public scoping meeting transcript are included in this SEIR as Appendix A.

A total of four letters were received during the NOP period. Letters were received from the following State agencies: California Department of Fish and Wildlife (CDFW), California Department of Transportation (Caltrans), and the Native American Heritage Commission (NAHC). The San Diego Association of Governments (SANDAG) also provided a comment letter. Comments were also received from the following members of the public during the scoping meeting: H. Wayne and M. Baker.

CDFW requested that the SEIR evaluate the consistency of amending the RPO Deed Restriction with current policies established under the City MSCP Subarea Plan and ESL regulations; that the SEIR should analyze alternatives that avoid direct and indirect impacts to sensitive biological resources; and the SEIR provide a thorough discussion of the biological resources in the area, the Master Plan Update's impacts on those resources, and mitigation for potentially significant impacts to those resources.

Caltrans requested that the SEIR evaluate the Master Plan Update's traffic impacts on State facilities and implement mitigation measures where appropriate.

The NAHC indicated the Project should comply with recently passed legislation regarding cultural resources, AB 52 and SB 18.

SANDAG recommended that the issues of smart growth and Transportation Demand Management be evaluated in the SEIR.

H. Wayne wanted to know more about the impact on the Overlook Heights neighborhood, including access or egress to the neighborhood, and any plans to change the open space by the tennis courts or the tennis courts themselves.

M. Baker expressed concerns about traffic from the Master Plan Update.

S.4 Issues to be Resolved by the Decision-Making Body

The issues to be resolved by the decision-making body are those of if and how to mitigate the direct significant impacts created by the implementation of the proposed Master Plan Update. The decision makers must decide if identified significant unmitigable impacts can be reduced, and if the significant impacts associated with the following environmental issues have been fully mitigated to below a level of significance:

- Land Use
- Transportation/Circulation
- Biological Resources
- Historical Resources
- Air Quality
- Public Utilities
- Visual Effects and Neighborhood Character

The decision makers must also decide if the project conforms to land use policies, such as those in the General Plan, and if deviations from these policies are justified and acceptable. Lastly, the decision makers must review the alternatives analyzed within the SEIR to determine whether the project or an alternative might meet the key objectives of the project while reducing its environmental impact.

S.5 Project Alternatives

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

In addition to the Master Plan Update, the SEIR addresses the following three alternatives per the above noted CEQA requirements in Section 8.0, *Alternatives*: the No Project/No Development Alternative; the No Project/Existing Master Plan Alternative; and the ESL Avoidance Alternative. These alternatives are summarized below, and evaluated in full in Section 8.0 of this document. A summary comparison of the impacts associated with the Master Plan Update and with the project alternatives is included in Table S-2.

S.5.1 No Project/No Development Alternative

Under the No Project/No Development Alternative no change would occur to the current student enrollment or university footprint. This alternative would be consistent with the provisions outlined in CEQA Guidelines Section 15126.6(e)(3)(A). The No Project/No Development Alternative would avoid all of the significant and potentially significant impacts associated with the project, including: (1) significant and unmitigated transportation/circulation and cumulative air quality (construction-period) impacts; and (2) significant and/or potentially significant impacts related to

transportation/circulation, biological resources, historical resources, air quality, public utilities and visual effects. The No Project/No Development Alternative would, however, fail to meet any of the basic project objectives listed above.

S.5.2 No Project/Existing Master Plan Alternative

Under the No Project/Existing Master Plan alternative, the University would continue to build out the remaining applicable portions of the 1996 Master Plan, which includes 16 previously approved and entitled projects. All other areas within the campus would remain in their current condition, including the 14 project sites proposed for development under the Master Plan Update and campus enrollment would be restricted to 7,000 FTE students, the existing level of enrollment at the campus, in accordance with the existing CUP/ RPO permit. The No Project/Existing Master Plan Alternative would avoid a number of significant and potentially significant impacts associated with the project, including: (1) significant and unmitigated transportation/circulation impacts; and (2) significant and/or potentially significant impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities, and visual effects (all of which would be avoided or reduced below a level of significance through identified mitigation measures and/or design features). Based on the 1996 Master Plan FEIR, the No Project/Existing Master Plan Alternative would also, however, result in: (1) significant and unmitigated cumulative impacts to transportation/circulation and air quality; and (2) significant (but mitigable) impacts related to transportation/circulation, biological resources, air quality and visual resources. This alternative would fail to meet most or all of the basic project objectives listed above.

S.5.3 Environmentally Sensitive Lands Avoidance Alternative

Under the ESL Avoidance Alternative, applicable projects under the Master Plan Update that impact ESL habitats or steep slopes would be eliminated to avoid associated ESL impacts. The lot area square footage would be reduced approximately 23 percent over the Master Plan Update, and the building GSF would be reduced approximately 19 percent. Similar to the proposed Master Plan Update, the USD student population would increase from 7,000 to 10,000 FTE students under this alternative. The ESL Avoidance Alternative would avoid or reduce significant and potentially significant impacts associated with issue areas including transportation/circulation, biological resources, historical resources, air quality, public utilities and visual effects (all of which would be avoided or reduced below a level of significance through identified mitigation measures and/or design features). The ESL Avoidance Alternative would, however, still result in significant (but mitigable) impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities, and visual resources. This alternative would meet most of the project objectives listed above.

S.5.4 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines requires an EIR to identify the environmentally superior alternative. For the Master Plan Update, the No Project/No Development Alternative is identified as the environmentally superior alternative, based on the fact that associated overall development would be less than any of the other alternatives. The CEQA Guidelines also note, however, that if the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. Accordingly, the ESL

Avoidance Alternative is identified as the environmentally superior alternative because it would avoid or reduce the Master Plan Update's impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities, and visual effects. Cumulatively significant and unavoidable transportation and construction-related air quality emissions would, however, still occur under this alternative.

**TABLE S-1
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION**

Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION		
Traffic Capacity: <i>Would the proposal result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?</i>		
Transportation Systems: <i>Would the proposal have a substantial impact upon existing or planned transportation systems?</i>		
Direct Impacts - Intersections		
Linda Vista Road/Alcalá Vista Apartments Entrance	<p>Tra-1 Traffic Mitigation Monitoring Program. Prior to the implementation of mitigation measure Tra-4 and upon <u>enrollment of 7,500 FTE and</u> each increase of 500 additional FTE, USD shall conduct a traffic mitigation monitoring program to monitor current conditions at the impacted intersection and confirm that the traffic signal warrants and Level of Service (LOS) operations that serve as the basis for the mitigation measure are met based on the traffic volumes present at that time. The following monitoring steps shall be taken by USD to comply with this measure.</p> <ul style="list-style-type: none"> a. USD shall submit annual FTE numbers to the City within 6 months of the beginning of the Fall semester <u>following approval of the Master Plan Update</u>. Applicable increases in FTE, as summarized in b) and / or d) below, will trigger the need to conduct a mitigation monitoring study reviewing the conditions at the subject intersection. b. <u>Upon reaching an annual enrollment of 7,500 FTE and upon each subsequent increase of 500 FTE,</u> USD shall submit a mitigation monitoring study for the Linda Vista Road / Alcalá Vista Apartments Entrance intersection <u>at 7,500 FTE (as described in Table 12-3 of the Project's TIA study)</u>. As summarized in Table 12-3 <u>of the Project's TIA study</u>, the significant impact at the Linda Vista Road / Alcalá Vista Apartments Entrance is expected with the addition of 500 FTE. c. Once an applicable increase in FTE triggers the need to conduct an mitigation monitoring study, <u>The mitigation monitoring study requires that</u> USD shall conduct AM and PM peak hour intersection counts at the subject intersection. The counts shall be done for one day on a Tuesday, Wednesday, or Thursday when school is in session <u>during the Fall semester</u>. 	See Tra-4

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION (cont.)		
Direct Impacts – Intersections (cont.)		
	<ul style="list-style-type: none"> i. Two analyses shall be conducted in the mitigation monitoring study. The subject intersection shall be analyzed to determine if a significant impact is caused by USD traffic based on the City LOS criteria. The LOS and delay calculated under “Near-Term without Project” conditions in the Project’s TIA study will serve as the baseline for comparing LOS and delay in the mitigation monitoring study. A peak hour traffic signal warrant shall also be conducted using the peak hour traffic counts. ii. If the mitigation monitoring analysis determines that USD traffic causes a significant impact <u>and</u> if the peak hour signal warrant shows that the warrant is met, USD shall be responsible for implementing the intersection mitigation measure of signaling the intersection as noted in Tra-4, which includes providing a dedicated southbound left turn lane and a dedicated southbound right turn lane, and coordinating the signal with the downstream signal at the Linda Vista Road/Via las Cumbres intersection to the east. iii. If the mitigation monitoring analysis identifies a significant impact, but signal warrants are not met, an alternative mitigation measure restricting left-turns out of the Alcalá Vista Apartments Entrance by constructing a raised median within Linda Vista Road shall be implemented. iv. The mitigation monitoring study, including the intersection and signal warrant analyses, must be completed and turned into the City’s Transportation Development Section each year a study is needed. d. If implementation of the mitigation measure is not found to be necessary under the FTE increases outlined in b) above, USD shall be responsible for monitoring the conditions at the intersection(s) with each subsequent increase of 500 FTE (500 FTE, 1,000 FTE, 1,500 FTE etc.). e. USD shall be responsible for monitoring the intersection until the need for one of the mitigation measures is triggered, or when the FTE increase reaches 3,000 FTE. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION (cont.)		
Direct Impacts – Intersections (cont.)		
Linda Vista Road/Napa Street	Tra-2: Payment Upon enrollment of 7,350 FTE, USD shall make the first payment of a of “fair-share” contribution of \$297,000 (to be paid in equal payments over a period of five years) toward future improvements to the Morena Corridor Specific Plan area (including the Linda Vista Road/Napa Street intersection) as specified in detail under Tra-5 would partially mitigate the Project’s contribution to this impact. Impacts would still be considered significant and unmitigated because the balance of the cost for the future, undefined, improvements is unfunded and not assured.	Significant and unmitigated
Linda Vista Road/Colusa Street	Tra-3: The Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Colusa Street intersection, to the satisfaction of the City Engineer. To improve overall intersection operations, it is also recommended, but not required, to eliminate six parking spaces along the east curb of Colusa Street to provide a dedicated 150-foot northbound left-turn lane and a dedicated northbound right-turn lane at Linda Vista Road. The provision of the dedicated northbound right-turn and left-turn lanes is not required to mitigate the significant impact.	Less than significant
Linda Vista Road/Alcalá Vista Apartments Entrance	Tra-4: Prior to enrolling 7,500 FTE students, one of two mitigation options shall be implemented once warranted by the mitigation monitoring program outlined in Tra-1. Option 1: If the monitoring program identifies a significant impact and if the peak hour signal warrant shows that the warrant is met, the Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Alcalá Vista Apartments Entrance intersection, provide a dedicated southbound left turn lane and dedicated southbound right turn lane, and coordinate the signal with the downstream signal at Via las Cumbres to the east, to the satisfaction of the City Engineer. Option 2: If the monitoring program identifies a significant impact, but signal warrants are not met, the Project applicant shall assure by permit and bond an alternative measure restricting left-turns out of the Alcalá Apartments Entrance by constructing a raised median within Linda Vista Road. Left-turns in would continue to be allowed.	Less than significant

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
TRANSPORTATION/CIRCULATION (cont.)		
Direct Impacts – Roadway Segments		
Linda Vista Road: Napa Street to Marian Way (Mildred Street).	<p>Tra-5: The following measure is required to partially mitigate the Project's direct significant impact to the subject roadway segment, with the impact still considered significant and unmitigated because the balance of the cost for the future, undefined, improvements is unfunded and not assured.</p> <ul style="list-style-type: none"> Prior to enrolling 7,350 FTE students, the Project applicant shall be required to provide a "fair share" contribution of \$297,000 (to be made in five equal payments over five years) towards future improvements to the Morena Corridor Specific Plan area (including the segment of Linda Vista Road between Napa Street and Marian Way [Mildred Street]), to the satisfaction of the City Engineer. 	Significant and unmitigated
Cumulative Impacts – Intersections		
Linda Vista Road/Napa Street	Tra-6: Implementation of Tra-5, as outlined above under <i>Direct Impacts</i> , would partially mitigate the Project's proportionate share of the cumulative impacts; however, the identified cumulative impact to the Linda Vista Road/Napa Street intersection is considered cumulatively significant and unmitigated because the balance of the cost of the future, undefined, improvements is unfunded and not assured.	Significant and unmitigated
Linda Vista Road/Colusa Street	Tra-7: Implementation of Mitigation Measure Tra-3, as outlined above under <i>Direct Impacts</i> , would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Colusa Street intersection.	Less than significant
Linda Vista Road/Alcalá Vista Apartments Entrance	Tra-8: Implementation of Mitigation Measure Tra-1 and Tra-4, as outlined above under <i>Direct Impacts</i> , would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Alcalá Vista Apartments Entrance intersection.	Less than significant
Cumulative Impacts – Roadway Segments		
Friars Road; Avenida de las Tiendas to SR 163 SB Ramps	The Long-Term (2035) scenario assumes the fully funded Phase I of the SR 163 / Friars Road Interchange Project, which includes improvements to the segment of Friars Road from Avenida de las Tiendas to Ulric Street / SR 163 SB Ramps. The timing and scope of Phases II and III of the Interchange Project are yet to be determined, contingent on funding, and will likely not include further improvements to this segment. Since there are no improvement projects towards which the Project can contribute a fair share payment, this impact is considered cumulatively significant and unmitigated in the Long-Term condition.	Cumulatively significant and unmitigated

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
BIOLOGICAL RESOURCES		
Sensitive Species: <i>Would the proposal result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?</i>		
Potential direct impacts to sensitive nesting birds. Indirect impacts to sensitive nesting birds within the MHPA would be significant.	<p>Bio-1 Biological Resource Protection</p> <p>I. Prior to Construction</p> <p>A. Biologist Verification: The owner/permittee shall provide a letter to the City's MMC section stating that a Project Biologist (Qualified Biologist), as defined in the City's Biology Guidelines (2012), has been retained to implement the biological monitoring program in this mitigation measure. The letter shall include the names and contact information of all persons involved in the biological monitoring of the Master Plan Update area.</p> <p>B. Pre-construction Meeting: The Qualified Biologist shall attend a pre-construction meeting, discuss the Master Plan Update's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.</p> <p>C. Biological Documents: The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts; and/or other local, State or federal requirements.</p> <p>D. Biological Construction Mitigation/Monitoring Exhibit: The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the Biological Documents listed above. In addition, include as applicable: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The Biological Construction Mitigation/ Monitoring Exhibit shall include a site plan, written and graphic depiction of the Master Plan Update's biological mitigation/monitoring program, and a schedule. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by MMC and referenced in the construction documents.</p>	Less than significant

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
BIOLOGICAL RESOURCES (cont.)		
	<p>E. Avian Protection Requirements: To avoid any direct impacts to sensitive or MSCP Covered birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.</p> <p>F. Resource Delineation: Prior to construction activities, the Qualified Biologist shall supervise the placement of silt and orange construction fencing or equivalent along the limits of disturbance (for Project Site Nos. 17, 19, 20, 22, 23, and 27) and verify compliance with any other conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to a site.</p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
BIOLOGICAL RESOURCES (cont.)		
	<p>GE. Education: Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).</p> <p>II. During Construction</p> <p>A. Monitoring: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the Biological Construction Mitigation/Monitoring Exhibit. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.</p> <p>B. Subsequent Resource Identification: The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, State or federal regulations have been determined and applied by the Qualified Biologist.</p> <p>III. Post Construction</p> <p>A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, State and federal law. The Qualified Biologist shall submit a final Biological Construction Mitigation/Monitoring Exhibit/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.</p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
BIOLOGICAL RESOURCES (cont.)		
Sensitive Habitats: <i>Would the proposal result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?</i>		
Direct impacts to Diegan coastal sage scrub would be significant because it is a Tier II habitat.	Bio-2 Sensitive Vegetation Communities Impacts to 0.5 acre of Diegan coastal sage scrub shall be mitigated at a ratio of 1:1 pursuant to Table 3, <i>Upland Mitigation Ratios</i> , in the City's Biology Guidelines (City 2012) for impacts outside the MHPA and mitigation inside the MHPA. Mitigation shall be accomplished via payment in to the City's Habitat Acquisition Fund equal to 0.5 acre of habitat.	Less than significant
Indirect impacts to nesting Cooper's hawks within the MHPA.	Bio-3 Nesting Cooper's Hawks To avoid impacts to Cooper's hawk, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for this species (February 1 to September 15). If removal of habitat within 300 feet of the MHPA (Projects 20, 21, 24, 27, and 28) must occur during the breeding season (February 1 to September 15), the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting Cooper's hawk within the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting Cooper's hawk are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan will include the establishment of a 300-foot construction avoidance area that shall be maintained around any active Cooper's hawk nest located inside the MHPA until the nest is no longer active as determined by the Qualified Biologist. The report or plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting Cooper's hawk are not detected during the precon survey, no further mitigation is required.	Less than significant

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES		
Historical Resources (Built Environment): <i>Would the proposal result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, object or site?</i>		
<p>There are several buildings of historic age on campus which are within or adjacent to project sites in the Master Plan Update. In addition, other campus buildings may reach an age of 45 or more years within the horizon of the Master Plan Update, which would then qualify them as potentially historic resources. Potentially significant impacts are identified, pending identification of exact buildings to be affected and the degree to which changes would occur as part of future actions and more detailed design.</p>	<p>Hist/Arch 1: The following measure shall be implemented for USD Master Plan Update project sites impacting structures 45 years of age or older at the time the <u>construction permit, including any demolition permit, project application</u> is submitted:</p> <p>I. Prior to Permit Issuance</p> <p>For any future projects that propose additions or modifications to structures or landscape features 45 years old or older, the structure or landscape feature shall be reviewed by qualified historic staff at the City of San Diego to determine whether or not the resource may meet one or more criteria for historic designation and therefore be considered potentially historic. If the structure or landscape feature being modified or removed by the construction is not assessed as potentially historic, the project shall proceed and no further mitigation will be required. If the evaluation determines that the project could affect potentially significant historic resources, then the following three listed items shall apply:</p> <ol style="list-style-type: none"> 1. If the evaluation determines that the project is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, then the potential historic significance will be documented and the project may be found to be in Substantial Conformance with the Master Plan and SEIR. 2. If the evaluation determines that the project is not consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, the project shall be redesigned to be consistent with the Standards, or a historic report that evaluates the building or landscape feature's integrity and eligibility under all designation criteria shall be completed and forwarded to the Historical Resources Board for review and consideration. 	<p>Less than significant</p>

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
Historical Resources (Archaeology): <i>Would the proposal result in any impact to existing religious or sacred uses within the potential impact area? Would the proposal result in the disturbance of any human remains, including those interred outside of formal cemeteries?</i>		
<p>It is possible that there are unknown resources within focused areas of the project. As a result, a conservative assessment is being made that there may be impacts to presently unknown resources and, as such, potentially significant impacts to cultural resources are assessed.</p>	<p>Hist/Arch-2: The following measure shall be implemented for USD Master Plan Update project sites relative to unknown cultural resources:</p> <p>I. Prior to Permit Issuance</p> <p>A. Entitlements Plan Check</p> <ol style="list-style-type: none"> 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process. <p>B. Letters of Qualification have been submitted to ADD</p> <ol style="list-style-type: none"> 1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation. 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG. 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program. 	<p>Less than significant</p>

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>II. Prior to Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> 1. The PI shall provide verification to MMC that a site specific records search (¼ mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed. 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ -mile radius. <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. <ol style="list-style-type: none"> a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring. 2. Identify Areas to be Monitored <ol style="list-style-type: none"> a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</p> <p>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <p>1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.</p> <p>2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.</p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<ol style="list-style-type: none"> 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present. 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSVs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC. <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate. 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery. 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible. 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>C. Determination of Significance</p> <ol style="list-style-type: none"> 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below. <ol style="list-style-type: none"> a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply. c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required. <p>IV. Discovery of Human Remains</p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p> <p>A. Notification</p> <ol style="list-style-type: none"> 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.</p> <p>B. <u>Isolate Discovery Site</u></p> <ol style="list-style-type: none"> 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains. 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance. 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin. <p>C. <u>If Human Remains ARE determined to be Native American</u></p> <ol style="list-style-type: none"> 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call. 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information. 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes. 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods. 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if: <ol style="list-style-type: none"> a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR; b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN, 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>c. In order to protect these sites, the Landowner shall do one or more of the following:</p> <ol style="list-style-type: none"> (1) Record the site with the NAHC; (2) Record an open space or conservation easement on the site; (3) Record a document with the County. <p>d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.</p> <p>D. If Human Remains are NOT Native American</p> <ol style="list-style-type: none"> 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial. 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98). 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man. <p>V. Night and/or Weekend Work</p> <p>A. <u>If night and/or Weekend Work is Included in the Contract</u></p> <ol style="list-style-type: none"> 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>2. The following procedures shall be followed.</p> <ul style="list-style-type: none"> a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day. b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery. c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV-Discovery of Human Remains shall be followed. d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made. <p>B. <u>If Night and/or Weekend Work Becomes Necessary During the Course of Construction</u></p> <ul style="list-style-type: none"> 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. 2. The RE, or BI, as appropriate, shall notify MMC immediately. <p>C. <u>All other procedures described above shall apply, as appropriate.</u></p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>VI. Post Construction</p> <p>A. <u>Preparation and Submittal of Draft Monitoring Report</u></p> <ol style="list-style-type: none"> 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met. <ol style="list-style-type: none"> a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report. b. Recording Sites with State of California Department of Parks and Recreation: The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report. 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report. 3. The PI shall submit revised Draft Monitoring Report to MMC for approval. 4. MMC shall provide written verification to the PI of the approved report. 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
HISTORICAL RESOURCES (cont.)		
	<p>B. Handling of Artifacts</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued. 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate. 3. The cost for curation is the responsibility of the property owner. <p>C. Curation of artifacts: Accession Agreement and Acceptance Verification</p> <ol style="list-style-type: none"> 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable. 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5. <p>D. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved. 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution. 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
AIR QUALITY		
Sensitive Receptors: <i>Would the proposal expose sensitive receptors to substantial pollutant concentrations?</i>		
Due to the potential for individual projects to include new sources of TACs, implementation of the Master Plan Update could result in potentially significant impacts related to TAC emissions.	AQ-1 Health Risk Assessment. Prior to the issuance of grading permits for any new facility that would have the potential to emit TACs, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. Building permits shall only be issued for facilities that demonstrate TAC emissions below the standards listed in Table 5.5-4 (excess cancer risk of 1 in 1 million or 10 in 1 million with Toxics-Best Available Control Technology [T-BACT] and non-cancer hazard index of 1.0).	Less than significant
Air Quality Standards: <i>Would the proposal result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?</i>		
Project would incrementally contribute to significant and unmitigable cumulative impact because of the non-attainment status of the SDAB and inability of one project to control emissions in the region.	No mitigation is available.	Less than significant on a project-level, but cumulatively significant and unmitigable.

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
PUBLIC UTILITIES		
Wastewater Infrastructure: <i>Would the proposal result in the need for new water or sewer systems or require substantial alterations to existing utilities, the construction of which would create physical impacts?</i>		
Development of the Project may increase the amount of sewer flow within the Linda Vista Road basin and contribute to the reduced functioning of reaches 10 through 13, resulting in potentially significant impacts.	<p>PU-1 Wastewater Infrastructure Improvements. At the time of the Grading Permit, Building Permit and/or Substantial Conformance review (SCR) application for Project Site Nos. 22, 23, 25 and/or 26, located within the off-site Linda Vista sewer basin, the University shall conduct sewer flow metering of the undersized sewer mains. If the results of the sewer flow metering are different than those included in the Master Plan Sewer Study (KLE 2016b), the University shall present the results to the City PUD for review and approval. For each project located within the Linda Vista Road sewer basin that is calculated to result in increased flows to the undersized sewer main reaches 10 through 13, the University shall work with the City's PUD to either:</p> <ul style="list-style-type: none"> Determine appropriate phasing and potential cost sharing for the upsizing of sewer reaches 10 through 13 to 10-inch sewer mains; or Pursue redirecting, via a private sewer pump station, the project(s)'s sewer flows from the existing public offsite Linda Vista sewer system into the existing public Tecolote Canyon Trunk Sewer. If this option is pursued, the offsite Linda Vista undersized sewer mains would not be required to be upsized as part of the above mentioned campus projects. 	Less than significant
VISUAL EFFECTS/NEIGHBORHOOD CHARACTER		
Steep Slopes: <i>Would the proposal result in a substantial change in the existing landform?</i>		
Impacts to steep slopes protected by ESL Regulations and the creation of manufactured slopes in excess of 10 feet in height associated with future project sites would be considered potentially significant.	<p>Vis-1 Prior to issuance of a grading permit for construction proposed to encroach into steep slopes (<u>i.e., Project Site No. 22</u>), a detailed grading plan shall be submitted to the City's Development Services Department and shall demonstrate to the satisfaction of the City Engineer substantial conformance with all grading policies in place at the time of project application. Special design requirements for slopes that are to be graded shall be clearly indicated on the grading plan. At a minimum, proposed manufactured slopes shall imitate, to the extent feasible, the existing landform features through the use of: (1) contour grading and terracing to avoid extreme slope faces; (2) undulation to avoid straight slope faces; (3) rounding the tops and toes of slopes to simulate natural contours; and (4) slopes that do not exceed a grade of 2:1. Grading plans shall be reviewed by the City to ensure that sensitive grading techniques are being utilized.</p>	Less than significant

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
PALEONTOLOGICAL RESOURCES		
Fossil Resources: <i>Would the proposal require excavation in a high or moderate resource potential geologic deposit/formaton?</i>		
<p>Actions associated with Project implementation could result in significant impacts to paleontological resources, specifically due to excavation that would take place on geologic units having a medium to high potential to produce paleontological resources (i.e., the Scripps, Friars, Lindavista and Bay Point formations)</p>	<p><u>Paleo-1: Moderate to High Sensitivity Formations</u></p> <p>The following mitigation measures contain project conditions that have been developed by the City to reduce potential paleontological impacts to below a level of significance. These requirements comprise a comprehensive program to address potential impacts to moderate to high-sensitivity paleontological resources associated with the Scripps, Linda Vista and Bay Point Formations, and are consistent with standard programs employed at other sites in the City. Implementation of these mitigation measures would allow preservation and future scientific study of any important paleontological resources encountered, thereby reducing impacts to below a level of significance.</p> <p><u>I. Prior to Permit Issuance</u></p> <p><u>A. Entitlements Plan Check</u></p> <ol style="list-style-type: none"> <u>Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.</u> <p><u>B. Letters of Qualification have been submitted to ADD</u></p> <ol style="list-style-type: none"> <u>The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.</u> <u>MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.</u> <u>Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.</u> 	<p><u>Less than significant</u></p>

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
PALEONTOLOGICAL RESOURCES (cont.)		
	<p><u>II. Prior to Start of Construction</u></p> <p><u>A. Verification of Records Search</u></p> <ol style="list-style-type: none"> <u>1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</u> <u>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</u> <p><u>B. PI Shall Attend Precon Meetings</u></p> <ol style="list-style-type: none"> <u>1. Prior to beginning any work that requires monitoring: the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.</u> <u>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</u> 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
	<u>PALEONTOLOGICAL RESOURCES (cont.)</u>	
	<p>2. <u>Identify Areas to be Monitored</u> - Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. <u>When Monitoring Will Occur</u></p> <p>a. <u>Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</u></p> <p>b. <u>The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.</u></p> <p><u>III. During Construction</u></p> <p><u>A. Monitor Shall be Present During Grading/Excavation/Trenching</u></p> <p>1. <u>The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.</u></p> <p>2. <u>The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.</u></p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
	<p><u>PALEONTOLOGICAL RESOURCES (cont.)</u></p> <p>3. <u>The monitor shall document field activity via the Consultant Site Visit Record (CSV).</u> <u>The CSVs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</u></p> <p><u>B. Discovery Notification Process</u></p> <p>1. <u>In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.</u></p> <p>2. <u>The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</u></p> <p>3. <u>The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.</u></p> <p><u>C. Determination of Significance</u></p> <p>1. <u>The PI shall evaluate the significance of the resource.</u></p> <p>a. <u>The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.</u></p> <p>b. <u>If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.</u></p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
	<u>PALEONTOLOGICAL RESOURCES (cont.)</u>	
	<p>c. <u>If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.</u></p> <p>d. <u>The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</u></p> <p><u>IV. Night and/or Weekend Work</u></p> <p>A. <u>If night and/or weekend work is included in the contract</u></p> <p>1. <u>When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</u></p> <p>2. <u>The following procedures shall be followed.</u></p> <p>a. <u>No Discoveries - In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSV and submit to MMC via fax by 8 AM on the next business day.</u></p> <p>b. <u>Discoveries - All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.</u></p> <p>c. <u>Potentially Significant Discoveries - If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</u></p> <p>d. <u>The PI shall immediately contact MMC, or by 8 AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</u></p>	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
<u>PALEONTOLOGICAL RESOURCES (cont.)</u>		
	<p><u>B. If night work becomes necessary during the course of construction</u></p> <ol style="list-style-type: none"> <u>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</u> <u>2. The RE, or BI, as appropriate, shall notify MMC immediately.</u> <p><u>C. All other procedures described above shall apply, as appropriate.</u></p> <p><u>V. Post Construction</u></p> <p><u>A. Preparation and Submittal of Draft Monitoring Report</u></p> <ol style="list-style-type: none"> <u>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.</u> <u>a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.</u> <u>b. Recording Sites with the San Diego Natural History Museum</u> <u>The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</u> <u>1. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</u> 	

TABLE S-1 (cont.)
SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION

Impact	Mitigation	Significance After Mitigation
	<p><u>PALEONTOLOGICAL RESOURCES (cont.)</u></p> <p><u>2. The PI shall submit revised Draft Monitoring Report to MMC for approval.</u></p> <p><u>3. MMC shall provide written verification to the PI of the approved report.</u></p> <p><u>4. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</u></p> <p><u>B. Handling of Fossil Remains</u></p> <p><u>1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.</u></p> <p><u>2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</u></p> <p><u>C. Curation of fossil remains: Deed of Gift and Acceptance Verification</u></p> <p><u>1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.</u></p> <p><u>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</u></p> <p><u>D. Final Monitoring Report(s)</u></p> <p><u>1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</u></p> <p><u>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.</u></p>	

Table S-2 COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS				
Environmental Issue Area¹	Project	No Project/No Build Alternative	No Project/ Existing Master Plan Alternative	ESL Avoidance Alternative
Land Use	LS	N	LS	LS
Transportation/Circulation	SU/SM	N	SU-/SM-	SU+/SM+
Biological Resources	SM	N	SM-	SM-
Historical Resources	SM	N	SM	SM-
Air Quality	SU/SM	N	SU+/SM-	SM-
Public Utilities	SM	N	N	SM-
Visual Resources	SM	N	SM-	SM-

¹ Includes issue areas with significant impacts identified for the Master Plan Update.

SM = significant but mitigable impacts; SU = significant and unmitigated impacts; LS = less than significant;

N = no significant impacts;

+ = increased impact level(s) relative to the project; - = reduced impact level(s) relative to the project

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1.0 INTRODUCTION

The University of San Diego (USD or University) proposes to update its existing campus Master Plan which is its framework for guiding the physical development of the USD campus. The USD Master Plan Update (or Project) evaluated in this Subsequent Environmental Impact Report (SEIR) provides a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 to 10,000 full-time equivalent (FTE) students over the next 20 years. The Project would increase the amount of physical development permitted on the USD campus, as well as the number of enrolled students. The City of San Diego (City) determined that the proposed revisions to the 1996 Master Plan outlined in Section 3.0, *Project Description*, and/or the circumstances surrounding its implementation require revisions to the existing City entitlements and certified California Environmental Quality Act (CEQA) document pursuant to Section 15162(a) of the State CEQA Guidelines.

This section provides the purpose and legal authority for the SEIR, a brief description of the Project background, the scope, and key components of the Project, the SEIR scope and process, and an explanation of how the SEIR is organized. This SEIR contains an analysis of the Project described in detail in Section 3.0, *Project Description*.

1.1 Purpose and Legal Authority

The public agency with the greatest responsibility for supervising or approving the project or the first public agency to make a discretionary decision to proceed with a proposed project should ordinarily act as the "Lead Agency" pursuant to State CEQA Guidelines Section 15051(b)(1). The City is the Lead Agency for the project evaluated in this SEIR. Section 15381 of the State CEQA Guidelines defines a Responsible Agency as all public agencies other than the Lead Agency, which have discretionary approval power over the project. Section 15386 of the State CEQA Guidelines defines a Trustee Agency as a state agency having jurisdiction by law over natural resources affected by a project, which are held in trust for the people of the State of California. The California Department of Fish and Wildlife (CDFW) is a Trustee Agency for the project due to the presence of MHPA and biologically sensitive resources on the campus.

This document complies with all criteria, standards, and procedures of CEQA and the State CEQA Guidelines (California Administrative Code 15000 et. seq.), as well as the City's EIR Guidelines. This document has been prepared as a SEIR pursuant to Section 15162 of the State CEQA Guidelines, as discussed in Section 1.4, *Subsequent Environmental Impact Report Scope*. This document represents the independent judgment of the City as Lead Agency (State CEQA Guidelines Section 15050).

1.2 Project Background

The USD campus occupies approximately 180 acres of land devoted to University-related uses in the central portion of the City, in the community of Linda Vista. The USD campus was formerly two, private academic institutions, the College for Women (started in 1949) and the College for Men (started in 1954). In 1972, the two institutions merged to form USD. As a private educational institution, the University is not its own Lead Agency under CEQA and is, therefore, required to apply to the City for permits and approvals to conduct campus construction. Since 1960, campus

improvements have been approved by the City through amendments to the original Conditional Use Permit (CUP) No. 3345. To provide a regional and long-term impact analysis of further expansions within USD, the City requested preparation of a Master Plan of foreseeable projects on the campus as part of the University's existing entitlement.

The existing Master Plan application submitted by the University to the City in 1992 initially conceptualized 26 campus project sites including expansions of existing structures, new academic facilities, additional parking, and sports facilities to be implemented over a 25- to 30-year period. The facilities conceptualized in the Master Plan were proposed in response to campus needs and a projected student enrollment of 7,000 full-time equivalent (FTE). During the review process for the Master Plan, revisions were made that redefined two of the project sites (North Student Housing and East Campus Playfield/Softball Field Area) as "Future Study Areas" and eliminated one project (Campus Fill). The Future Study Areas were applied to two areas on the USD campus where the University intended to develop at some point in the future, but additional development plans and subsequent discretionary approval (i.e., CUP amendment) would be required. Of the 26 construction sites originally envisioned in the existing Master Plan, the final plan identified 23 construction sites and two Future Study Areas, as well as general campus improvements.

USD received approval of its Master Plan, including Design Guidelines, in 1996 (1996 Master Plan) to guide the phased buildout of the campus through the year 2030. Concurrent with the City's approval of the 1996 Master Plan, Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) Permit No. 92-0568 was issued to allow the campus to construct 23 projects outlined in the 1996 Master Plan and expand student population to 7,000 FTE. A Deed Restriction was also recorded, in conjunction with approval of the 1996 CUP/RPO Permit No. 92-0568, to protect the remaining on-campus sensitive biological resources and steep hillsides avoided by the Master Plan (refer to Figure 5.3-2 in the Biological Resources section). The Deed Restricted Areas were not, however, recorded to protect mitigation lands; rather, they were recorded to protect steep slopes and biologically sensitive areas to remain undeveloped under the 1996 Master Plan. In conjunction with the Master Plan approval, the City certified the 1996 Master Plan Final Environmental Impact Report (FEIR) (SCH No. 93121032), including its associated technical studies.

Over the past 20 years, several CUP amendments and Substantial Conformance Review (SCR) approvals have been granted to the University by the City during the implementation of the 1996 Master Plan:

- Amendment to CUP/ RPO Permit No. 92-0568 (LDR No. 98-0239) – Construction of Northeast Student Housing and realignment of softball field and large play field
- CUP No. 98-1188 - Addition of a 2.41-acre parcel containing office buildings
- CUP No. 40-0419 – Construction of short-term residential for visiting scholars, speakers, and professors on sabbatical
- CUP No. 10325 (Project No. 6242) – Construction of the School of Education and Child Development Center
- SCR Project No. 140192 - Renovation of Toreros Baseball Park, construction of Intercollegiate Athletics Center, Soccer Field, and Parking Structure

- CUP No. 489856, Site Development Permit (SDP) No. 585430, and Planned Development Permit (PDP) 585432 (Project No. 14021) – Construction of the Recreation and Wellness Center and Softball, Golf and Club Sports Facility
- CUP/SDP No. 41-0092 (LDR No. 41-0092) – Construction of Lower West Parking Structure

Of the 23 projects identified in the 1996 Master Plan, various improvements and several structures or facilities have been constructed. Seven key new structures constructed since 1996 include: Jenny Craig Pavilion, Joan B. Kroc Institute for Peace and Justice, Shiley Center for Science and Technology, Mother Rosalie Hill Hall, Manchester Village Student Housing Student Life Pavilion, Beyer Institute for Nursing Research and West Campus Parking Structure. Figure 1-1, *Previously Approved Project Sites* and Table 1-1, *Previously Approved Project Sites Summary* identifies projects/sites approved under the 1996 Master Plan. The 1996 Master Plan permitted over 1 million gross square feet (GSF) of new buildings on campus (or the total building area to exterior walls, including each floor of the building [also referred to as the total building envelope]). The 16 projects that have yet to be built represent 828,134 GSF of new buildings on campus plus recreation improvements and a housing renovation (Table 1-1). Thirteen of the projects would be renamed as part of the Master Plan Update, as noted in the table.

**Table 1-1
PREVIOUSLY APPROVED PROJECTS SUMMARY¹**

Site # (refer to Figure 1-1)	Lot Area (approx. sq. ft.)²	Building Footprint (approx. sq. ft.)	Lot Coverage³	Building GSF⁴	Building ASF⁵	# Beds	Building Height⁶	Project Description
1	144,660	75,000	52%	75,000	2,500	n/a	1.0	Approved under CUP 92-0568 as Sports Park; Tennis Center; Renamed as Athletics/ Administrative/ Underground Parking
2	16,540	6,250	38%	16,500	9,900	n/a	3.0	Approved under CUP 92-0568 as Environmental Studies Building; Renamed as Academic/ Administrative Building
3	53,180	13,500	25%	33,750	20,250	n/a	2.0	Approved under CUP 92-0568 as Library Expansion; Renamed as Academic/Administrative Building
4	167,000	5,400	3%	5,400	3,240	n/a	1.0	Approved under CUP 92-0568 as Landscaped Pedestrian Mall; Renamed as Plaza
5	59,820	29,300	49%	73,250	43,950	n/a	4.0	Approved under CUP 92-0568 as Olin Hall Expansion; Renamed as Academic/Administrative Building with Structured Parking
6	45,400	8,500	19%	22,960	13,776	n/a	3.0	Approved under CUP 92-0568 as Hughes Expansion; Renamed as Administrative/Academic Building
7	40,620	19,200	47%	76,780	46,068	n/a	3.0	Approved under CUP 92-0568 as Serra Hall addition with partial demolition of existing building; Renamed as Academic/Administrative Building with Basement

**Table 1-1 (cont.)
PREVIOUSLY APPROVED PROJECTS SUMMARY¹**

Site # (refer to Figure 1-1)	Lot Area (approx. sq. ft.)²	Building Footprint (approx. sq. ft.)	Lot Coverage³	Building GSF⁴	Building ASF⁵	# Beds	Building Height⁶	Project Description
8	157,260	1,500	1%	1,500	n/a	n/a	1.0	Approved under CUP 92-0568 as Pedestrian Mall; Renamed as Plaza with enhanced connection across buildings and enhanced entry gateway and tram drop-off
9	164,800	65,970	40%	133,507	80,104	n/a	3.0	Approved under CUP 489856, SDP 585430, PDP 585432 and amendment to CUP 92-0568 as Recreation, Wellness & Aquatic Center
10	34,400	12,500	36%	25,000	15,000	n/a	2.0	Approved under CUP 92-0568 as Public Safety Building; Renamed as Administrative/Parking
11	34,320	8,000	23%	24,000	14,400	80	3.0	Approved under CUP 92-0568 as Renovation to Missions Housing; Renamed as Housing/Student Services
12	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Approved under CUP 92-0568 as Stadium Grandstands and Fieldhouse Facility; Renamed as Stadium Grandstands
13	103,250	26,540	26%	67,642	40,585	n/a	3.0	Approved under SCR Project No. 140192 as Collegiate Athletic Center and Office Building; Renamed as Athletics/Administrative/Housing/ Parking

**Table 1-1 (cont.)
PREVIOUSLY APPROVED PROJECTS SUMMARY¹**

Site # (refer to Figure 1-1)	Lot Area (approx. sq. ft.)²	Building Footprint (approx. sq. ft.)	Lot Coverage³	Building GSF⁴	Building ASF⁵	# Beds	Building Height⁶	Project Description
14	209,110	93,000	44%	183,235	n/a	n/a	1.0	Approved under SCR Project No. 140192 as parking and soccer field
15	51,720	20,150	39%	80,600	48,360	179	4.0	Approved under CUP 92-0568 as Northeast Campus Student Housing; Renamed as Student Housing/Student Services/ Administrative/ Parking
16	61,340	5,000	8%	9,010	9,010	n/a	2.0	Approved under CUP 489856, SDP 585430, PDP 585432 and amendment to CUP 92-0568 as softball, golf and club sports building

Source: MW Steele 2016

Notes:

¹ All projects listed in this table remain unbuilt as of the preparation of the SEIR.

² All square footage numbers are approximate estimates and do not represent surveyed areas; for projects with an n/a identified there are no applicable square footages or beds associated with the project.

³ Lot Coverage is the percentage of the site that can be feasibly developed given classification of site as least, moderately or highly constrained.

⁴ Gross square footage (GSF) is the total developable building area to exterior walls, including each floor of the building (also known as the building envelope).

⁵ Assignable square footage (ASF) is space within a building that can be designated for a particular use.

⁶ Building height is the number of occupied, enclosed and above grade stories of a building at the lowest adjacent ground elevation.

USD has also implemented numerous mobility improvements, including an on- and off-campus shuttle service/tram that runs on three loops and connects students across all areas of campus, as well as outwards to the Linda Vista community and larger San Diego region through continual service to and from the Old Town Transit Center. The University has also expanded carpooling, ridesharing, and electric and clean vehicles programs. Four major parking structures have been constructed in recent years, with a combined capacity exceeding 2,000 spaces. Further, walkability has increased through the closure of Marian Way at Colachis Plaza; installation of accessible ramps, stairs, and pathway improvements throughout campus; and improvements to bicycle facilities on campus.

Campus-edge improvements have additionally been completed under the approval of the 1996 Master Plan, including enhancements where USD interfaces with both the Linda Vista community and Tecolote Canyon. Specifically, improvements to the Main (Alcalá Park) and West Campus (Marian Way) entrances from Linda Vista Road, as well as landscape restoration using native species along canyon edges and slopes adjacent to Tecolote Canyon have been made. Infrastructure improvements include investments in lighting associated with athletic facilities to prevent neighboring users from exposure to glare and light spillage.

The vision and goals for the campus are updated from time to time to reflect the changes in demographics and the economy that affect higher education. Over the last several years, USD campus officials have been conducting vision planning and space planning exercises to address the future needs of the University, many of which are summarized above. Based on these needs, revisions to the existing 1996 Master Plan are now proposed under this SEIR and are described in Section 1.3, *Project Scope*.

1.3 Project Scope

The USD Master Plan Update provides a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 to up to 10,000 FTE students over the next 20 years. It is estimated that such a future enrollment population may increase space needs on campus by approximately 471,738 assignable square feet (ASF) (or space within a building that can be designated for a particular use). The campus has also projected to need a net of 80,000 to 90,000 additional ASF for recreation and athletics to accommodate the increase in future enrollment. The USD Master Plan Update proposes new academic core/student service/support uses, athletics and recreation uses, and additional student housing. Parking supply expansions would also occur under the Master Plan Update.

The Project identifies 14 proposed facilities or improvements projects which would allow for the construction of academic/administrative buildings, student housing, student services uses, athletics/athletic support/administrative buildings, parking, pedestrian circulation and landscape improvements not contemplated in the 1996 Master Plan and related FEIR. The new projects identified in the Master Plan Update would be located in areas of the campus that were not previously contemplated for development under the 1996 Master Plan. The Master Plan Update incorporated the 16 currently entitled projects within the comprehensive plan update; thirteen of which are renamed by the Project. No substantial changes to the entitled projects are proposed under the Project. Design Guidelines contained in the Master Plan Update would provide a

comprehensive design framework to guide all future campus development, including the previously entitled projects. A detailed description of the 14 new sites identified by the Master Plan Update is provided in Section 3.0, *Project Description*.

1.4 Subsequent Environmental Impact Report Scope

The scope of this SEIR was determined in the context of the prior CEQA documentation prepared for the 1996 Master Plan, taking into account changes or revisions to that plan identified in the Master Plan Update or Project that could trigger new significant impacts and/or more severe impacts than identified in the 1996 Master Plan FEIR.

1.4.1 Prior CEQA Documentation

The 1996 Master Plan FEIR concluded that implementation of the Master Plan would result in potentially significant impacts to Traffic/Circulation/Parking, Air Quality, Visual Quality/Landform Alteration, Biological Resources, Geology/Soils, Cultural Resources, Paleontological Resources, Hydrology, Light/Glare, and Land Use/Community Character. Of those topics, significant and unmitigable impacts were identified for Air Quality (cumulative) and Traffic/Circulation/Parking (cumulative); all other significant impacts would be mitigated by measures identified in the 1996 Master Plan FEIR. Less than significant impacts would occur to Land Use/Community Character, Noise, Water Quality, Natural Resources, Hazardous Materials, Population/Housing, Public Services, Utilities, and Energy.

1.4.2 Subsequent Review of Project Revisions

As CEQA Lead Agency, the City determined that proposed revisions to the 1996 Master Plan outlined in Section 3.0, *Project Description*, and/or the circumstances surrounding its implementation require revisions to the existing City entitlements and certified CEQA document pursuant to Section 15162(a) of the State CEQA Guidelines. CEQA Guidelines Section 15162 provides that a SEIR is warranted if the Lead Agency determines, among other things, that substantial changes have occurred to a project that will have one or more significant effects not discussed in the previous EIR or the revised project has the potential to increase the severity of significant impacts in the previous EIR. In the instance of the Project, the amount of campus development and student enrollment would increase beyond levels that were previously identified in the 1996 Master Plan and contemplated in the 1996 Master Plan FEIR, potentially resulting in new and/or substantially more severe impacts.

Technical reports have been prepared that address this project related to Transportation/Circulation, Biological Resources, Historical Resources, Air Quality, Hydrology/Water Quality, Public Utilities, Noise, and Geologic Conditions. The new information presented in these technical reports reflects changes in circumstances or contains information that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified. Therefore, the City has determined that a SEIR is appropriate for the Project.

1.4.3 Notice of Preparation/Scoping Meeting

As Lead Agency, the City prepared a Scoping Letter, which was distributed with the Notice of Preparation (NOP) on April 4, 2016 to all responsible and trustee agencies, as well as various governmental agencies, including the Office of Planning and Research's State Clearinghouse (SCH). The City also conducted a public scoping meeting, in accordance with Section 21083.9 of CEQA, on April 20, 2016. The SEIR addresses in detail potentially significant environmental impacts associated with the following issues:

- Land Use
- Transportation/Circulation
- Biological Resources
- Historical Resources
- Air Quality
- Hydrology/Water Quality
- Public Utilities
- Visual Effects/Neighborhood Character

Project revisions would not result in new potentially significant or more severe impacts with respect to Agricultural and Forestry Resources, Energy Conservation, Geologic Conditions, Health and Safety, Mineral Resources, Noise, Paleontological Resources, Population and Housing, and Public Services and Facilities due to no increase in severity of impacts analyzed in the prior FEIR and/or no exceedance of the City Significance Determination Thresholds as described in Section 7.0, *Other CEQA Sections*, of this SEIR.

A copy of the Scoping Letter, NOP, Scoping Meeting notice, Scoping Meeting sign-in sheet, and Scoping Meeting transcript are contained in Appendix A. Verbal and written comments received during the scoping process have been taken into consideration during the preparation of this SEIR. An outline of the issues noted during the scoping process is contained in the *Areas of Controversy/Issues to be Resolved* discussion in the Executive Summary section. The environmental conditions evaluated as the baseline in this SEIR are those that existed at the time the NOP was circulated as described in Section 2.0, *Environmental Setting*.

1.4.4 Incorporation By Reference

The purpose of this SEIR is to provide project-level subsequent environmental impact analysis that accurately analyzes the Project in light of current conditions, circumstances, and new information that was not available and not analyzed in previously certified environmental documentation. As permitted by Section 15150 of the State CEQA Guidelines, this project-level SEIR incorporates by reference information and analysis contained in the project-level analysis conducted in the 1996 Master Plan FEIR (Project No. 92-0568 / SCH No. 1993121032), including its associated technical studies and the Wellness Recreation Center Mitigated Negative Declaration (Project No. 140201/SCH No. 2008101161), which was tiered from the 1996 Master Plan FEIR. The relationship between the incorporated part of the referenced documents and the SEIR has also been described in Sections 5.0, *Environmental Analysis* and 7.0, *Other CEQA Sections*, where appropriate.

1.5 Public Review Process

This SEIR and the technical analyses it relies on are available for review by the public and public agencies for 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the

project might be avoided or mitigated” (State CEQA Guidelines Section 15204). The SEIR and all supporting technical studies and documents are available for review at the City of San Diego, Development Services Department, 1222 First Avenue, Fifth Floor, San Diego, 92101-4153, as well as at the USD Campus Library, Linda Vista Library, Mission Valley Library, and Downtown San Diego Library. An electronic copy of the SEIR and the technical analyses is also posted on the City’s website at <https://www.sandiego.gov/city-clerk/officialdocs/notice>. The prior certified CEQA document and technical studies referenced herein can be reviewed at the Development Services Department office at the location noted above.

The City, as Lead Agency, will consider the written comments received on the Draft SEIR and at the public hearing in making its decision whether to certify the SEIR as complete and in compliance with CEQA, and whether to approve or deny the project, or take action on a project alternative. In the final review of the Project, environmental considerations, as well as economic and social factors, will be weighed to determine the most appropriate course of action. Subsequent to certification of the SEIR, agencies with permitting authority over all or portions of the Project may use the SEIR to evaluate environmental effects of the Project, as they pertain to the approval or denial of applicable permits.

1.6 Content and Organization of the Subsequent Environmental Impact Report

As stated above, the content and format of this SEIR are in accordance with the most recent guidelines and amendments to CEQA and the State CEQA Guidelines. Technical studies have been summarized within individual environmental issue sections and/or under summary sections, and the full technical studies and Water Supply Assessment (WSA) have been included in the appendices to this report and are available for review during the public comment period.

In addition to Section 1.0, *Introduction*, this SEIR has been organized in the following manner:

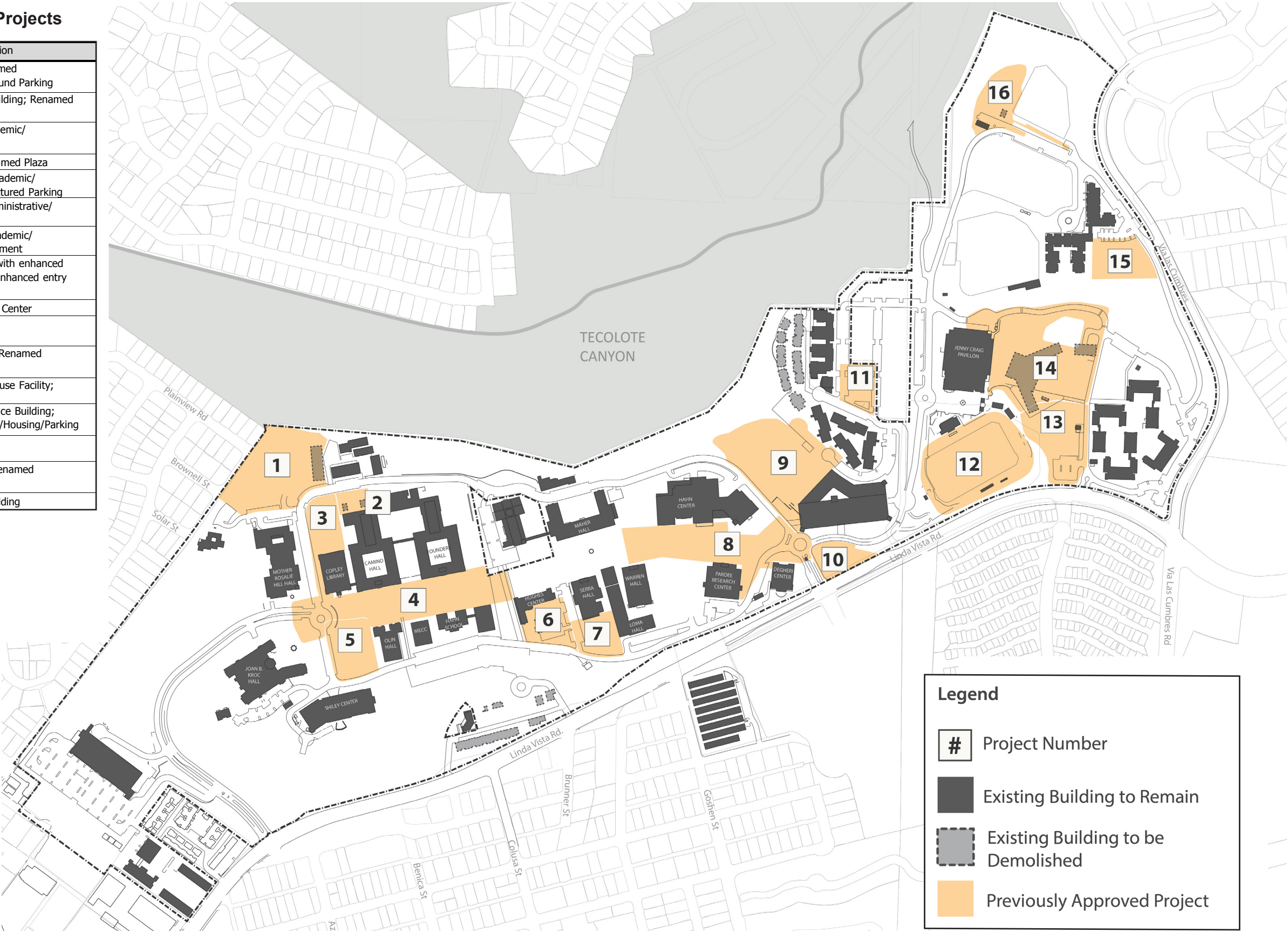
- **Executive Summary** provides a summary of the SEIR analysis, discussing the project description, the alternatives which would reduce or avoid significant impacts, and the conclusions of the environmental analysis. The conclusions focus on those impacts which have been determined to be significant but mitigated, as well as impacts considered significant and unmitigated, if applicable. Impacts and mitigation measures are provided in tabular format. In addition, this section includes a discussion of areas of controversy known to the City, including those issues identified by other agencies and the public.
- **Section 2.0, Environmental Setting**, provides an overview of the regional and local setting, as well as the physical characteristics or setting of the USD campus at the time the NOP was issued. The setting discussion also addresses the relevant planning documents and existing land use designations of the Project site.
- **Section 3.0, Project Description**, provides a detailed description of the Project, including its purpose, goals and objectives, key Project characteristics, substantial conformance review process, and discretionary actions required for Project implementation.

- **Section 4.0, History of Project Changes**, chronicles the changes made to the Project design in response to environmental concerns raised during the City's review of the Project application.
- **Section 5.0, Environmental Analysis**, constitutes the main body of the SEIR and includes the detailed impact analysis for the environmental issues determined to have the potential for significant adverse impacts as a result of the Project. The topics analyzed in this section include: Land Use, Transportation/Circulation, Biological Resources, Historical Resources, Air Quality, Hydrology/Water Quality, Public Utilities and Visual Effects/Neighborhood Character. Under each topic, a discussion of existing conditions, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with implementation of the Project is included. Where the impact analysis demonstrates the potential for a significant adverse impact on the environment, mitigation measures are provided which would minimize the significant effects. The SEIR indicates whether the mitigation measures would reduce impacts to below a level of significance.
- **Section 6.0, Cumulative Impacts**, addresses the cumulative impacts due to implementation of the Project in combination with other reasonably foreseeable, recently approved or pending projects in the area, based on input from City staff. The area of potential effect for cumulative impacts varies depending upon the type of environmental issue.
- **Section 7.0, Other CEQA Sections**, addresses effects found not to be significant, as well as other mandatory CEQA analyses. Specifically, the text briefly discusses environmental issues determined not to have the potential for significant adverse impacts as a result of the project revisions. The areas with effects found not to be significant include: Agricultural and Forestry Resources, Energy Conservation, Geologic Conditions, Health and Safety, Mineral Resources, Noise, Population and Housing, and Public Services and Facilities. This section also addresses effects for which no change in the prior analysis would occur, specifically Paleontological Resources. The section further addresses significant unavoidable impacts of the Project, including those that can be mitigated but not reduced to below a level of significance; significant irreversible environmental changes that would result from the Project, including the use of nonrenewable resources; and growth inducement, which includes a discussion of the potential for the Project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.
- **Section 8.0, Project Alternatives**, provides a description and evaluation of alternatives to the Project. This section addresses the "No Project" alternative, as well as development alternatives that would reduce or avoid the Project's significant impacts.
- **Section 9.0** contains the Mitigation, Monitoring and Reporting Program for the Project.
- **Section 10.0** contains the References, and Individuals and Organizations Consulted
- **Section 11.0** lists the Certifications/Qualifications of the SEIR Preparers.

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Previously Approved Projects

Site #	Project Description
1	Sports Park; Tennis Center; Renamed Athletics/Administrative/Underground Parking
2	Parking Environmental Studies Building; Renamed Academic/Administrative Building
3	Library Expansion; Renamed Academic/Administrative Building
4	Landscaped Pedestrian Mall; Renamed Plaza
5	Olin Hall Expansion; Renamed Academic/Administrative Building with Structured Parking
6	Hughes Expansion; Renamed Administrative/Academic Building
7	Serra Hall Addition; Renamed Academic/Administrative Building with Basement
8	Pedestrian Mall; Renamed Plaza with enhanced connection across buildings and enhanced entry gateway and tram drop-off
9	Recreation, Wellness and Aquatic Center
10	Public Safety Building; Renamed Administrative/Parking
11	Renovation to Missions Housing; Renamed Housing/Student Services
12	Stadium Grandstands and Fieldhouse Facility; Renamed Stadium Grandstands
13	Collegiate Athletic Center and Office Building; Renamed Athletics/Administrative/Housing/Parking
14	Parking and Soccer Field
15	East Campus Student Housing; Renamed Student Housing/Student
16	Softball, Golf and Club Sports Building



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Source: M.W. Steele 2016

Previously Approved Project Sites

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The University of San Diego (USD) campus occupies approximately 180 acres of roughly rectangular-shaped land devoted to university-related uses in the central portion of the City of San Diego (City), in the community of Linda Vista. The campus is located five miles east of the Pacific Ocean, four miles north of downtown San Diego, approximately 0.5 mile east of Interstate (I-) 5 and 0.5 mile north of I-8 (Figures 2-1, *Regional Location Map*, and 2-2, *Project Location and Vicinity*). Mission Bay Park occurs approximately 0.75 mile to the west and San Diego River flows about 0.5 mile to the south. The USD campus is located within an unsectioned area of Township 16 South, Range 3 West, on the U.S. Geological Survey (USGS) 7.5-minute La Jolla quadrangle map. Tecolote Canyon Natural Park forms the northern border of the campus; Morena Boulevard is located to the west, with Via Las Cumbres bordering the campus on the east, and Linda Vista Road to the south. Regionally, the campus can be accessed from I-5, I-8, and State Route (SR-) 163 via local interchanges with Sea World Drive/Tecolote Road, Morena Boulevard, and Genesee Avenue (Figure 2-1). Local access is available from Linda Vista Road, which parallels the southern boundary of the campus. Two campus entrances exist along Linda Vista Road, the west entry is at Marian Way, while the east (main) entry is at Alcalá Parkway (Figure 2-2). A controlled and gated access also exists along Via Las Cumbres along the eastern campus boundary. The USD campus is within 0.5 mile of the Morena/Linda Vista Trolley Station, and is approximately 0.9 mile north of the Old Town Transit Center.

2.2 Existing Physical Setting

The campus is a private, four-year university that was founded by the Catholic Diocese of San Diego and chartered in 1949. Through the merger of the College of Men and San Diego College of Women, the University was established as USD in 1972. The majority of the property is developed and supports campus facilities (academic buildings, sports facilities, parking lots, etc.) and ornamental landscaping as shown in an aerial photography of the property (Figure 2-2). USD currently enrolls 7,000 full-time equivalent (FTE) students consisting of both undergraduate and graduate students.

The buildings on the USD campus are designed and built in a distinctive 16th Century Spanish Renaissance architectural theme with plazas, gardens, courtyards, arcades and the Marian Way Mall and Colachis Plaza, as specified in the 1996 Master Plan. Several of the structures were constructed during the early establishment of the campus. Landmark buildings that occur on campus that are visible from off-campus locations include the Church of the Immaculata, as well as the Joan B. Kroc Institute for Peace and Justice and Shiley Center for Science and Technology. These structures contribute to the character of the Linda Vista community and to the city's skyline, although the Church of the Immaculata is not a part of the Master Plan.

Academic uses are generally concentrated on the west end of campus, with professional programs arranged in a line of buildings that stretches across the south side of Marian Way and Colachis Plaza and almost to the Marian Way entrance of campus. The eastern end of campus is predominantly used for residential and athletic purposes. A main defining element of the campus is the pedestrian mall along Marian Way. The central portion of Marian Way is closed to cars and referred to as Colachis Plaza. In contrast to the highly manicured landscaping of the central campus, the

surrounding landscape is natural and rugged, particularly along the southern edge facing Linda Vista Road and the northern edge that enters Tecolote Canyon (Figure 2-3, *Existing Campus Setting*). Photographs that illustrate the character of the University and the various land uses in the area are contained in Section 5.8, *Visual Effects/Neighborhood Character*.

Topography on site ranges from approximately 50 feet above mean sea level (AMSL) in the western portion of the campus to approximately 260 feet AMSL in the eastern portion. A total of approximately 16.2 acres of steep slopes occur within the campus property. Steep slopes on campus include the slope just north of the west entrance of the University at Marian Way, the north-facing slope on the southern rim of Tecolote Canyon, the north-facing slope adjacent to the existing Sports Complex, and the south-facing slope north of Linda Vista Road. Natural vegetation, including Diegan coastal sage scrub, maritime succulent scrub, southern willow scrub, southern mixed chaparral, and non-native grassland, comprises approximately 21 acres of the 180-acre campus. Several species of sensitive plants and animals have been observed on campus, including the coastal California gnatcatcher, as described in Section 5.3, *Biological Resources*. Of the 180 acres, 7.6 acres fall within the Multi-habitat Planning Area (MHPA), which is the City's Multiple Species Conservation Program (MSCP) Preserve.

Geologic formations identified within or adjacent to the campus include the Quaternary-age Lindavista Formation (or very old paralic deposits) and Bay Point Formation (or old paralic deposits), as well as the Tertiary-age San Diego, Friars and Scripps formations. The closest active faults and associated Earthquake Fault Zones are located approximately two miles to the northwest along the Rose Canyon Fault Zone. Eight soil types are present on campus: Carlsbad-Urban land complex, Gaviota fine sandy loam, Huerhuero loam, Huerhuero-Urban land complex, Olivenhain-Urban land complex, Redding-Urban land complex, Reiff fine sandy loam, and terrace escarpments. There are no identified hazardous material or related sites within or adjacent to the campus. Refer to related discussions under *Geologic Conditions* and *Health and Safety* in Section 7.0, *Other CEQA Sections*.

The primary local access to the campus is provided by Linda Vista Road, which is classified as a four-lane major roadway within the project area and is built as a four-lane collector with a striped median and intermittent two-way left-turn lane between Morena Boulevard and Via Las Cumbres and a four-lane major road with a raised median between Kramer and Comstock streets. There are two campus entrances that intersect with Linda Vista Road and provide access to the internal campus loop road and parking areas: Alcalá Parkway and Marian Way. Three intersections and four roadway segments in the project area currently operate at level of service (LOS) E or worse, including Linda Vista Road/Colusa Street, Linda Vista Road/Genesee Avenue, Friars Road/Ulric Street/SR-163 Southbound ramps, Morena Boulevard between Tecolote Road to Buenos Avenue, between Buenos Avenue and West Morena Boulevard and between Linda Vista Road and I-8 ramps and Linda Vista Road between Napa Street and Marian Way/Mildred Street, as described in Section 5.2, *Transportation/Circulation*.

A 230-kilovolt (kV) San Diego Gas and Electric (SDG&E) electrical powerline right-of-way (ROW) traverses the eastern portion of the campus in a north-south direction. The ROW features towers and transmission lines; surface parking areas and an access road have easements that encroach into the SDG&E ROW. There are two areas in the western portion of the campus (collectively covering 4.9 acres) that were deed-restricted to protect sensitive biological resources as a condition of approval of the 1996 Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) Permit.

The conditions described above constitute the baseline environmental setting used for addressing any changes in the environment resulting from the Project. More detailed discussion of the Project's environmental setting is provided in Section 5.0, *Environmental Analysis*, and Section 7.0, *Other CEQA Sections*.

2.3 Surrounding Land Uses

The Linda Vista community is highly urbanized and primarily residential, with other land uses consisting of light industrial and commercial in the Morena Boulevard area, retail uses in central Linda Vista, and the institutional uses of USD. Housing types include single-family homes on small lots, duplexes, triplexes, and small apartment buildings. Surrounding land uses in the vicinity of the USD campus include commercial/industrial development and residential housing in the Morena Boulevard area to the west of the campus, student and non-student multi-family housing immediately to the south and various types of residential development to the east. Tecolote Canyon Natural Park contains undeveloped regional open space to the north and is enveloped by MHPA. Certain parcels on or adjacent to the USD campus are outside the Master Plan project boundaries. These parcels include the Church of the Immaculata and St. Francis Center for Priestly Formation, both of which are located on campus. A single-family residence located on Josephine Street is surrounded by the proposed CUP boundary, but is also not a part of the Master Plan (Figure 2-3). The campus is located within the Airport Influence Area (AIA) for San Diego International Airport (SDIA) and Montgomery Field.

2.4 Planning Context

The following plans contain policies, goals, and objectives that are applicable to the project. A detailed discussion of these plans is provided in Section 5.1, *Land Use*.

2.4.1 City of San Diego General Plan

The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. The General Plan is comprised of a Strategic Framework Element and ten additional elements covering planning issues such as housing, transportation, and conservation. The campus is designated as "Institution and Public-Semi-Public Facilities" in the Land Use Map for the General Plan (City 2008).

The General Plan lays the foundation for the more specific community plans which rely heavily on the goals, guidelines, standards, and recommendations within the General Plan. Applicable goals and recommendations from the General Plan are referenced in this SEIR, where applicable.

2.4.2 Linda Vista Community Plan

The Linda Vista community, comprising about 2,400 acres, is located on the southwestern portion of Kearny Mesa, overlooking Mission Bay and Mission Valley. The Linda Vista Community Plan was adopted in 1983 and updated in 1998. Subsequent amendments to the current plan were adopted in 2007 and 2011. The Community Plan also serves as Local Coastal Program Land Use Plan for

properties within the community that also reside within California Coastal Zone. The Linda Vista Community Plan and Local Coastal Program Land Use Plan is the City's statement of policy regarding growth and development of the Linda Vista community planning area. The plan proposes goals, policies, and strategies for land uses and public facilities. The plan designates areas for residential, commercial, industrial, and public uses, as well as areas that are to remain undeveloped. The Community Plan establishes the basis for development regulations, including such measures as zoning designations and development impact fees, and for the expenditure of public resources within the community. USD is located within the Linda Vista community plan area, outside of the Coastal Zone. The majority of the campus is designated for Institutional use, while a small amount of open space is designated that generally corresponds with the Deed Restricted areas linked to the existing CUP/RPO Permit (Figure 2-4, *Existing Land Use Designations* and Figure 5.3-2 in the Biological Resources section that shows the Deed Restricted areas).

2.4.3 Land Development Code

Zoning regulations for the project site are governed by the City's Land Development Code (LDC). The majority of the project site is located within the Residential zones (RS-1-7, RM-1-1, and RM-3-7) with small areas zoned Open Space (OR-1-1 and OP-2-1) and Commercial (CC-4-2, CC-4-5 and CC-5-4) as shown in Figure 2-5, *Zoning Designations*. The campus is also located in the Community Plan Implementation Overlay Zone (CPIOZ) Type A and Parking Impact Overlay Zone (Campus Impact Area).

CUP regulations in the LDC are intended to review certain uses on a case-by-case basis to determine whether, and under what conditions, the use may be approved at a given site. As stated in Section 126.0301 of the LDC, each use should be developed so as to fully protect the public health, safety, and welfare of the community. To provide this protection, conditions may be applied to address potential adverse effects associated with the proposed use.

The City regulates development of environmentally sensitive lands (ESL) through its ESL Regulations (LDC Section 143.0101 et seq.). The purpose of the ordinance is to "protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands." ESLs are defined to include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains.

2.4.4 Natural Community Conservation Planning Program/ Multiple Species Conservation Program

The Natural Community Conservation Planning (NCCP) Program initiated by the State of California in 1991 resulted in the promulgation of the special 4(d) rule of the federal Endangered Species Act (ESA). This rule focuses on conserving coastal sage scrub habitat in order to avoid the need for future federal and state listing of each individual coastal sage scrub-dependent species. The City, County of San Diego, U.S. Fish and Wildlife Service (USFWS), and CDFW, and other local jurisdictions collaborated in the late 1990s to develop the MSCP. The MSCP is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species by identifying key areas for preservation as open space that link core biological areas into a regional wildlife preserve.

The City adopted its MSCP Subarea Plan (Subarea Plan) in March 1997 to meet the requirements of the NCCP, the federal ESA, and the California ESA. Approximately 7.6 acres of the campus occur within the MHPA and support Diegan coastal sage scrub, southern mixed chaparral, southern willow scrub, non-native grassland, eucalyptus woodland, disturbed habitat, non-native vegetation and developed land (HELIX Environmental Planning, Inc. [HELIX] 2016a).

2.4.5 Tecolote Canyon Natural Park Master Plan

The Tecolote Canyon Natural Park Master Plan (Park Master Plan) was adopted in 1983 and provides an inventory of environmental resources, addresses social qualities, analyzes current conditions, recommends measures for restoration and preservation of significant features and provides recommendations for the future development of the park. In the Park Master Plan, the park is divided into subareas for planning purposes; USD is adjacent to Subarea A. The University is recognized in the Park Master Plan as a private institution that “will permit organized groups the use of their parking lot and entry from the bus stop,” provided permission is granted. The Park Master Plan serves as the primary planning document for the park and recommends discretionary review of all projects located adjacent to the park.

2.4.6 Tecolote Canyon Natural Park Natural Resources Management Plan

Adopted in 2006, the purpose of the Tecolote Canyon Natural Park Natural Resource Management Plan (NRMP) is to provide guidance for the management, maintenance, utilization, and development of the Park while preserving the Park’s natural and cultural resources. This NRMP is intended not only to make provisions for the protection and preservation of natural and cultural resources, especially sensitive resources, but also to allow safe and accessible use of the Park to meet the needs of the surrounding communities. The NRMP provides for the maintenance and preservation of the Park’s natural environment and associated visual enjoyment of the Park’s open space.

2.4.7 Tecolote Canyon Rim Development Guidelines

The guidelines set forth in the Tecolote Canyon Rim Development Guidelines (City 1987) are to be used only for the area adjacent to Tecolote Canyon. The intent of these guidelines is to assure that development along the rim of the canyon occurs in such a way that native habitat within the canyon is enhanced and protected from damage associated with development. The document provides guidelines for structures, traffic circulation, grading, drainage, landscaping, and fire protection.

2.4.8 Airport Land Use Compatibility Plans

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the ALUC for SDIA and Montgomery Field, the two closest public aviation facilities to the USD campus; the

airports are approximately one mile and three miles, respectively away. The campus is within the AIA for both facilities.

The AIA for both SDIA and Montgomery Field serves as the planning boundaries for the Airport Land Use Compatibility Plan (ALUCP) for those airport facilities and is divided into two review areas: (1) Review Area 1 is comprised of the noise contours, safety zones, airspace protection surfaces, and overflight areas; and (2) Review Area 2 is comprised of the airspace protection surfaces and overflight areas. The USD campus is within Review Area 2 for both SDIA and Montgomery Field.

The ALUCPs were adopted to establish land use compatibility policies and development criteria for new development within the AIAs to protect the airport from incompatible land uses and provide the City with development criteria that will allow for the orderly growth of the area surrounding the airports. The policies and criteria contained in the ALUCPs are addressed in the General Plan (Land Use and Community Planning Element and Noise Element) and implemented by the supplemental development regulations in the Airport Land Use Compatibility Overlay Zone within Chapter 13 of the San Diego Municipal Code (SDMC). The campus is not within this land use compatibility zone.

2.4.9 Regional Air Quality Strategy

The Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The San Diego County Regional Air Quality Strategy (RAQS) is updated on a triennial basis, most recently in 2009. The RAQS outlines APCD's plans and control measures designed to attain the state air quality standards for ozone. The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP, approved by the U.S. Environmental Protection Agency (USEPA) in 1996, includes the APCD's plans and control measures for attaining the ozone national standard. The SIP is also updated on a triennial basis.

The RAQS relies on information from California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the APCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for ozone.

2.4.10 Water Quality Control Plan for the San Diego Basin

The Regional Water Quality Control Board (RWQCB) adopted a Water Quality Control Plan for the San Diego Basin (Basin Plan) that recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground and surface waters, and local water quality conditions and problems (RWQCB 1994). Water quality objectives identified in the Basin Plan are based on established beneficial uses, and are defined as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses." These objectives are incorporated into related regulatory requirements, such as the National Pollutant Discharge Elimination System (NPDES) permitting process.

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Regional Location Map

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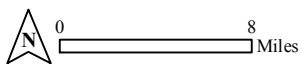


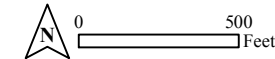
Figure 2-1



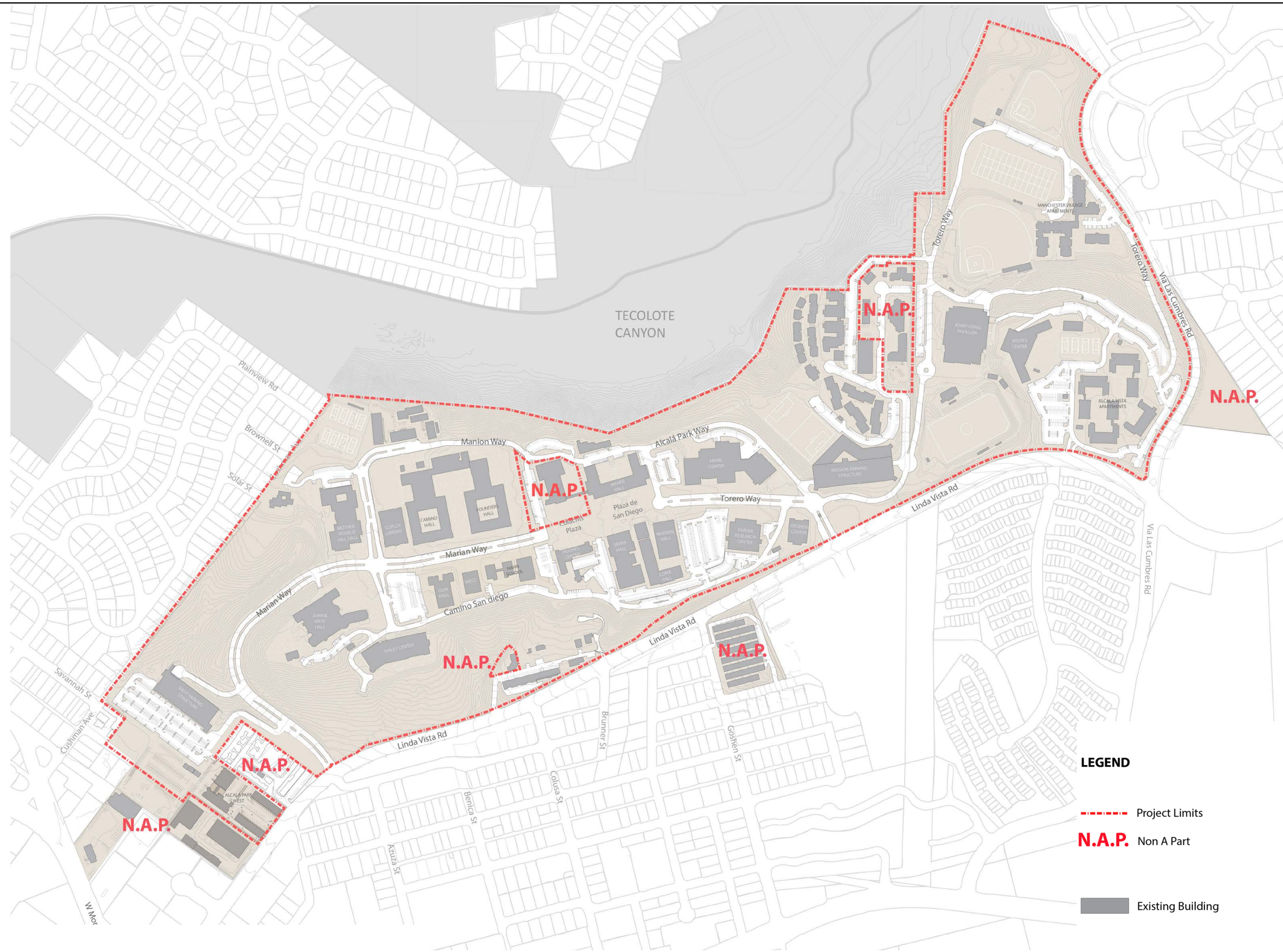
Project Location and Vicinity

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Figure 2-2



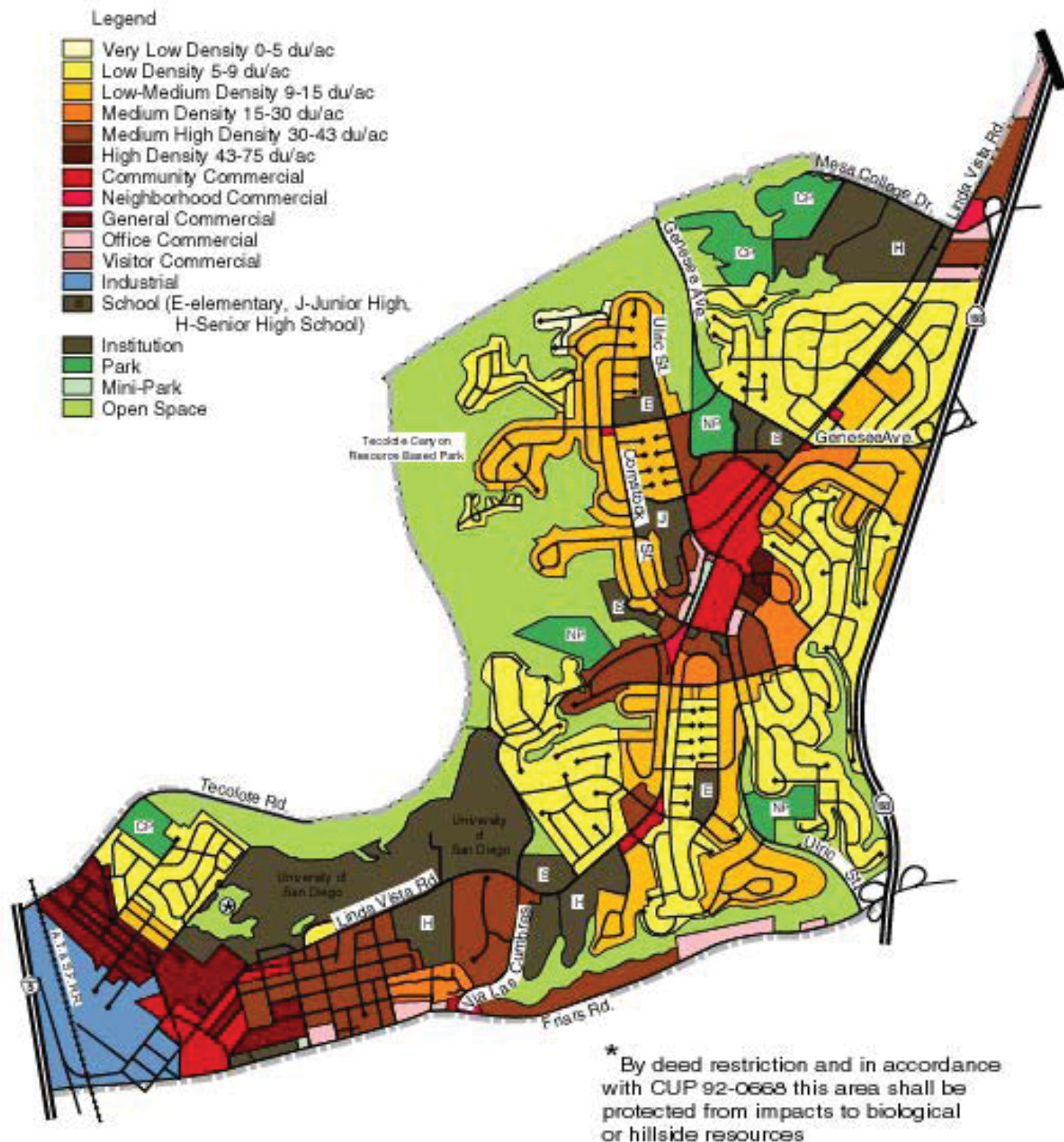
Source: M.W. Steele 2016



Existing Campus Setting

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

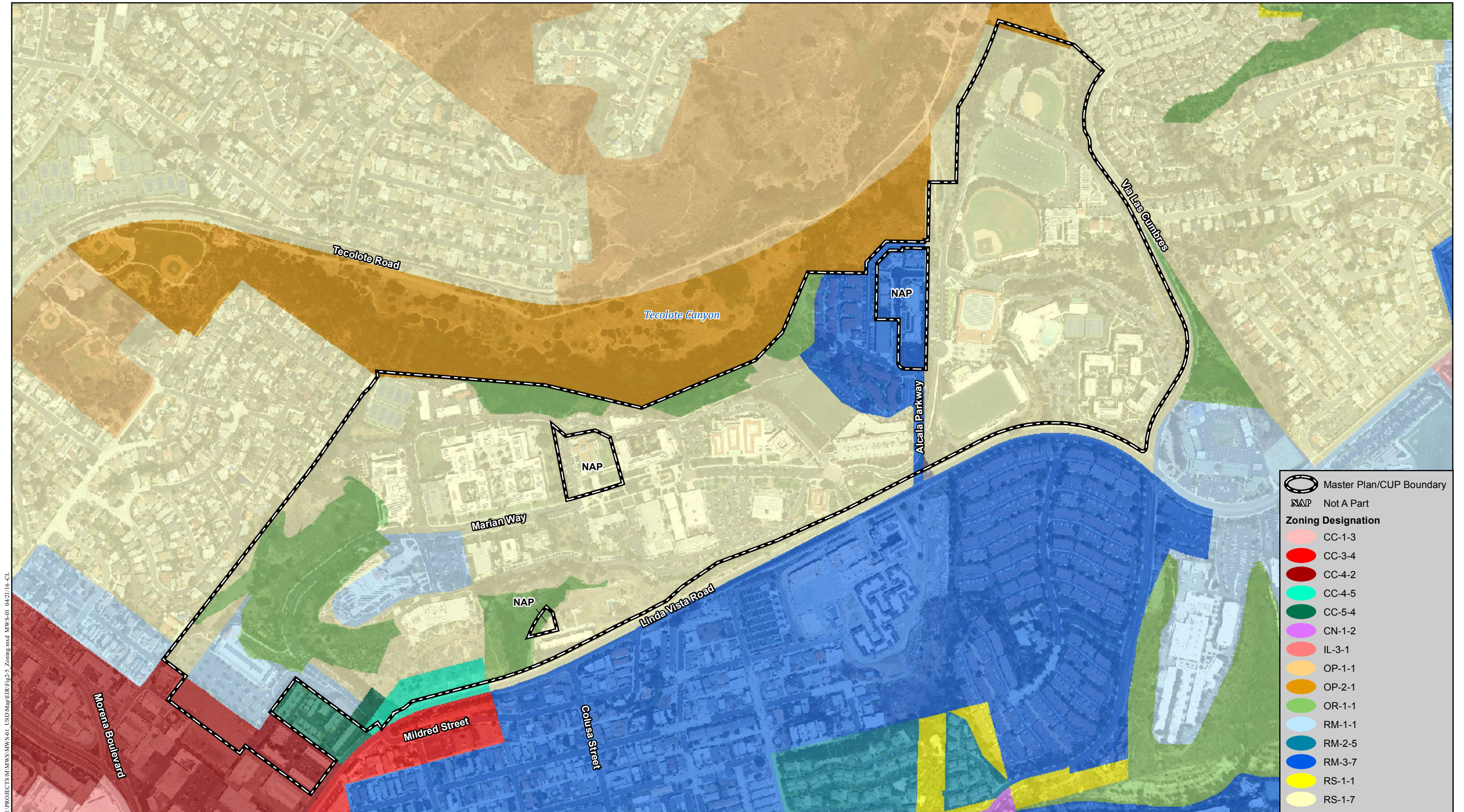
Figure 2-3



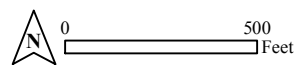
Source: City of San Diego, Community and Economic Development Plan 1999

Existing Land Use Designations

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE



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Zoning Designations

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 2-5

3.0 PROJECT DESCRIPTION

This section of the Subsequent Environmental Impact Report (SEIR) provides a statement of Project purpose, goals, and objectives; discusses the student enrollment projections that informed the Master Plan Update; describes the overall proposed improvements to the campus under the Master Plan Update; summarizes and describes the design guidelines and sustainability features outlined in the Master Plan Update; outlines the City's Substantial Conformance Review (SCR) process and its applicability to Project implementation; and identifies the discretionary actions required. This section has been prepared pursuant to Section 15124 of the California Environmental Quality Act (CEQA) Guidelines.

3.1 Project Purpose, Goals, and Objectives

The Master Plan Update (herein referred to as the "Project") encompasses a comprehensive update of the University of San Diego (USD) 1996 Master Plan (1996 Master Plan) and its associated Design Guidelines, as well as amendments to the existing entitlements for the campus. The main purpose of the Master Plan Update is to serve as an updated framework for guiding the physical development of the USD campus over the next 20 years, further achieving the academic goals and objectives of the campus outlined in the 1996 Master Plan. Many of the goals and objectives identified in the 1996 Master Plan Final Environmental Impact Report (FEIR) are relevant and applicable to the Project, including those related to:

- Developing new and renovated facilities and capital improvements;
- Renovating or replacing buildings to improve degraded conditions;
- Siting new buildings in locations that offer programmatic advantages;
- Siting facilities to enhance spatial usage of the campus;
- Designing to be compatible with the established style and scale of existing campus structures;
- Improving pedestrian access to, from, and within campus;
- Incorporating accessibility features into existing and new buildings; and
- Providing additional on-campus housing and proximate parking.

Additional Project objectives have been identified by USD as part of the Master Plan Update planning process, including:

- Prioritize the campus mesa for the highest and best use of campus land, especially the academic core, wherein all traditional degree programs will be focused into instructional spaces;

- Ensure adequate space is available for projected academic growth and for an on-campus population up to 10,000 full-time equivalent (FTE) students;
- Develop a framework and design guidelines for building and landscape improvements;
- Identify campus development opportunities that balance the University's mission and its financial sustainability;
- Allow the campus to expand internally without altering its physical boundary by infilling surface parking lots and underutilized or vacant campus lands, thereby reducing the need to acquire additional property and reducing potential conflicts with neighbors;
- Guide the intensification of the campus as it grows in a way that does not significantly alter the campus character, but contributes to its enhancement and quality;
- Integrate administrative, academic, housing, athletic, and recreational uses into a cohesive physical campus and campus experience;
- Update the living and learning environment to better reflect campus residential life and academic goals;
- Enhance the student experience, elevate academic excellence on campus, and continue to distinguish USD as a place for education, scholarship, and service;
- Enhance mobility and access throughout the campus and expand mobility options on campus;
- Guide the creation of an aesthetically pleasing, well-functioning university campus that is integrated within, contributes positively to, and respects the surrounding community; and

3.2 Student Enrollment Projections

3.2.1 Full-time Student Enrollment

The existing 1996 Master Plan was based on an anticipated population of 7,000 FTE, which is the annual average of on-campus full-time equivalent student population. On-campus FTE at USD excludes those enrolled in study abroad, online courses, and off-campus programs such as internships and distance learning. The USD student population has reached 7,000 FTE and is projected to increase over time under the influence of changing demographics and increased competition between institutions for the “best” students. Based on FTE growth over the past three 10-year periods (i.e., 1984-1994, 1994-2004, and 2004-2014), it is estimated that USD could grow by approximately 2,000 FTE by 2035 if current trends continue. The unstable economy; however, has provided a new set of dynamics that makes it slightly more difficult to predict student FTE. Therefore, past growth patterns cannot be relied upon as the sole predictor of future enrollment. Other factors come into play when predicting student enrollment trends (refer to the Master Plan Update in Appendix B for additional details).

Based on the foregoing, USD has chosen to plan for an enrollment of up to 10,000 FTE to be achieved over the next 20 years. This FTE enrollment projection allows the University to (1) evaluate future space requirements and (2) compare those space needs against the physical capacity of the campus facilities. Therefore, the need to provide additional facilities as outlined in the Master Plan Update is based on the anticipated 3,000 FTE increase in enrollment and associated academic growth.

3.2.2 Anticipated Space Needs

Campus space needs are measured in assignable square feet (ASF) which is space within a room that can be designated for a particular use. ASF is different from gross square feet (GSF), which is the total space within the exterior walls of a building. An analysis of USD's space needs shows there are substantial physical space needs that the campus must address to accommodate both its current capacity and future growth. The campus currently is at capacity, and there are not enough classrooms, labs, and office space even for the current student enrollment and associated campus population (including faculty and staff). Three primary factors are driving the growth of the physical campus:

1. The need to provide upgraded facilities for those uses which currently are overcrowded or housed in temporary or aging facilities.
2. The need to increase the amount of classrooms, teaching laboratory space, and offices, in response to current space being at capacity, the changing academic learning environment, and the expanded and new courses of study being offered at USD that require specialized spaces outside of the traditional classroom environment.
3. The need to provide additional facilities to accommodate the anticipated increases in student enrollment.

The Master Plan Update shows existing and anticipated facilities that may be necessary to accommodate up to 10,000 FTE. It is estimated that such a future enrollment population may increase space needs on campus by between 400,000 and 600,000 ASF. Based on a detailed analysis of USD's space needs—taking into consideration the existing and projected supply of academic, student life, and support space at both the current level of student enrollment and campus employment, and growing to up to 10,000 FTE—it is anticipated that the greatest needs would be for classroom and teaching lab space, and office space. Student lounge and study space, multi-purpose meeting space, and housing/dining space are also needed. The Master Plan Update includes a space program and associated design framework that would require a combination of new construction, renovation, and reorganization of existing space.

Beyond the needs for additional academic, office, student life and support space discussed above, USD has identified a total need for approximately 80,000 to 90,000 ASF recreation and exercise space to meet the expectations of the projected 10,000 future FTE. This need includes the previously approved and entitled project (i.e., Wellness Recreation Center) described in Section 1.0, *Introduction*, and would satisfy the needs of the projected future FTE for additional recreation and exercise ASF.

3.3 Project Characteristics

USD received approval of its existing Master Plan and associated Design Guidelines in 1996 (1996 Master Plan), concurrent with the City-issued CUP and Resource Protection Ordinance (RPO) and associated Deed Restriction described in Section 1.0, *Introduction*. A summary of the 1996 Master Plan and changes that have occurred on campus and the surrounding community since approval of the 1996 Master Plan is also provided in Section 1.0, *Introduction*. The following discussion outlines the features of the Project, as described in the Master Plan Update contained in Appendix B. Thus, the Project consists of the proposed Master Plan Update. Design Guidelines contained in the Master Plan Update would provide a comprehensive design framework to guide all campus development, including the 16 projects that have received approvals under the existing CUP/RPO Permit but have not been constructed.

3.3.1 General Project Features

The USD Master Plan Update provides a comprehensive update of the 1996 Master Plan and its Design Guidelines, and updates the campus' building space and infrastructure needs related to increasing enrollment from 7,000 to 10,000 FTE over the next 20 years. The Master Plan Update would allow for the development of additional academic core/student service/support uses and athletics and recreation uses, and student housing. Parking supply expansions would also occur under the proposed Master Plan Update. The Deed Restriction recorded as part of the 1996 Master Plan may also be modified if the City determines it is no longer needed because new protective environmental regulatory requirements (i.e., Multiple Species Conservation Program [MSCP] Subarea Plan and Environmentally Sensitive Lands [ESL] Regulations) have been enacted since approval of the 1996 Master Plan and RPO Permit.

The Master Plan Update would allow 14 new campus development projects not contemplated in the 1996 Master Plan. The 14 proposed projects outlined in the Master Plan Update are shown in conjunction with the existing and entitled campus development on Figure 3-1, *USD Site Plan – Existing, Entitled and Proposed*. The Master Plan Update includes Design Guidelines to provide a general design framework, sustainability guidelines to encourage resource conservation through design, and more specific design recommendations for the various geographic areas of the campus (i.e., Focused Areas), as described in further detail below.

3.3.2 Master Plan Update Framework

The basic framework of the Master Plan Update includes strategies to help USD define the overall physical layout of the campus to allow development in the future to accommodate projected student population growth up to 10,000 FTE. The framework addresses the planning challenges facing the existing campus that laid the foundation for the physical changes proposed by the Project.

The USD campus is composed of three distinct districts: Campus Core/Academic District, East Campus/Residential and Recreation District, and the Alcalá Village District (refer to Figure 10 in Appendix B). The districts generally are defined by topography and existing dominant program uses (e.g., academics, residential/recreation, and mixed uses/parking); accordingly, each district has a character recognizable to campus users. The Master Plan Update seeks to further connect the three

districts of the campus by removing or reducing barriers between them and making each more accessible from the other. Examples of how this would be achieved include the addition of more pedestrian corridors within and between the districts, and the inclusion of more mixed uses in each district. The Master Plan Update also seeks to build in more flexible and shared spaces. The Master Plan Update would support this effort by expanding existing buildings and programs to accommodate growth in academic programs before constructing new buildings and developing new programs.

Due to the compact nature of the USD campus, people generally can reach most of the mesa within a 5- to 10-minute walk from Colachis Plaza. Through the implementation of the Master Plan Update, USD would become a multi-modal campus, with expanded access to regional transit at the Morena/Linda Vista Trolley Station; extensive on-campus pedestrian facilities to encourage foot travel while reducing vehicular dependence; improved bicycle facilities; and expanded parking. Marian Way and the Colachis Plaza (the center of campus bisecting the Campus Core/Academic District) would be designated as a Pedestrian Priority Zone, comprising a central open space “spine” that would connect the various program clusters and campus districts. Frequent and reliable shuttle/tram service would continue to be provided to and across campus and Alcalá Village District (Figure 3-2, *Pedestrian and Tram Circulation and Connectivity* and Figure 3-3, *Bicycle and Multi-modal Circulation*).

Parking requirements associated with the Master Plan Update would be met using a variety of methods, including the construction of new parking structures, the expansion of the existing West Alcalá Parking Structure, and the development of small lots and structures interspersed throughout the periphery of the campus but also connected to the center of campus through frequent and reliable shuttle service. As shown on Figure 3-4, *Vehicle Circulation and Parking Structures*, the supply of structured parking on campus would increase under the Master Plan Update, from an existing count of 2,433 spaces to a proposed count of 4,512 (increase of 2,079 spaces). Surface parking would be provided to include approximately 1,687 to 1,790 total surface spaces on campus.

Through the implementation of landscape concepts in the Master Plan Update (Figure 3-5, *Tree and Planting Strategies*), USD would enhance its identity, use low-water use landscapes to address drought conditions and water shortages, plant the campus Paseo to unify the campus’ axis, and create additional and improved outdoor spaces (e.g., recreational spaces, outdoor study niches, social gathering plazas, and event lawns) to improve student life. In conjunction with proposed landscape enhancements, the Master Plan Update would also increase the functionality of existing, under-used exterior spaces, including academic courtyards; social courtyards; and event spaces, lawns, and plazas to organize and integrate both major campus activities and casual gatherings. The Master Plan Update plant palette includes a mix of tree, shrub, grass, groundcover, bio-retention plant, and vine species that are commonly used in San Diego and are well adapted to the climate, soils, and growing conditions (refer to Appendix B for the full plant palette).

3.3.3 Master Plan Update Project Sites

The Master Plan update identifies 14 projects that would occur as the campus grows over the next 20 years. The 14 projects fall into the following categories: academic/administrative buildings (including support uses), student housing, student services uses, athletics/athletic support/administrative buildings, physical plant and facilities, parking structures and lots, pedestrian

circulation/plaza/bridge, and trails/landscape enhancements (Figure 3-6, *Projects Site Plan*). The noted categories are not mutually exclusive, however, and in many cases multiple uses would be grouped into one building or complex. The phased development of the 14 projects would collectively add 471,738 ASF of new building space to the campus, including 1,003 student housing beds. This new ASF and housing would be contained within the approximately 922,230 GSF of the new or renovated structures.

Figure 3-6 illustrates the 14 proposed sites while general descriptions of each of the projects are provided below in Table 3-1, *Master Plan Update – Project Sites*. Please note that the numbering of the 14 projects are numbered 17 to 30 and is continuous with the numbering of the 16 entitled projects identified in Table 1-1. Please also refer to Figure 3-1 which illustrates all 30 sites and their relationships to existing campus buildings.

Accordingly, the table below identifies potential program uses, site capacities, and space types, including key information regarding the size of the site, the building ground floor area (physical footprint), and building height, that may be suitable for each of the 14 projects in the Master Plan Update. Generally, these determinations have been made based on size, desired program expansion near the same program's existing site, other desirable adjacencies, and most suitable site to accommodate specific program needs (e.g., create residential neighborhoods, optimize service and loading area configurations, provide a large building footprint). In all cases, the assignment of program/space needs to a site has been analyzed to maximize the efficient use of limited land or site resources. It should be recognized, however, that with the passage of time projected programs may change, funding sources may or may not be available, and flexibility by the University would be required.

**Table 3-1
MASTER PLAN UPDATE - PROJECT SITES**

Site #	Lot Area (SF) ¹	Building Footprint (SF)	Lot Coverage ²	Building GSF ³	Building ASF ⁴	# Beds	Stories/ Levels Above Grade ⁵	Maximum Height (ft) ⁶	Proposed Use/ Description ⁷	Focus Area ⁷
17	36,500	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Former Lower Olin Future Study Area; Trails/ Landscape Enhancements	Focus Area I
18	62,850	27,200	44%	136,000	n/a	n/a	3.0	40.0	Parking/Administrative/ Support. Two stories below grade Parking Garage	Focus Area H
19	36,800	5,000	14%	n/a	n/a	n/a	1.0	45.0	Plaza/Mall/Bridge	Focus Area H and I
20	55,940	25,000	45%	32,000	19,200	n/a	2.0	24.0	Academic/Administrative/ Support	n/a
21	22,520	9,000	40%	13,500	8,100	n/a	2.0	30.0	Academic/Administrative/ Student Services Building	Focus Area F
22	152,120	50,000	33%	176,000	105,000	n/a	4.0	65.0	Academic/Administrative Building (step down with grade)	Focus Area K
23	74,540	49,000	66%	148,240	88,944	329	4.0	55.0	Student Housing/Parking Structure (step down with grade)	Focus Area K
24	41,650	22,000	53%	65,000	39,000	186	5.0	60.0	Student Housing/Student Services/Parking	Focus Area E
25	34,910	23,700	68%	71,100	42,660	n/a	3.0	45.0	Academic/Administrative/ Parking Building	Focus Area L
26	43,980	26,000	59%	69,500	41,700	n/a	3.0	45.0	Former Engineering Expansion of Loma Hall; Academic/Administrative Building	Focus Area L
27	89,690	28,570	32%	85,710	51,426	245	3.0	40.0	Student Housing/Student Services	Focus Area D

Table 3-1 (cont.)
MASTER PLAN UPDATE - PROJECT SITES

Site #	Lot Area (SF) ¹	Building Footprint (SF)	Lot Coverage ²	Building GSF ³	Building ASF ⁴	# Beds	Stories/ Levels Above Grade ⁵	Maximum Height (ft) ⁶	Proposed Use/ Description ⁷	Focus Area ⁷
28	22,790	6,200	27%	12,400	7,440	n/a	2.0	30.0	Athletics/Administrative Building	n/a
29	22,580	4,280	19%	4,280	2,568	n/a	1.0	15.0	Facilities/Athletics Support	Focus Area B
30	131,780	36,500	28%	109,500	65,700	243	3.0	40.0	Student Housing/Student Services/Parking/Athletics	Focus Area B
Totals	827,650	312,450	38%	922,230	471,738	1,003				

Source: M.W. Steele 2016

¹ All square footage numbers are approximate estimates and do not represent surveyed areas.

² Lot Coverage is the percentage of the site that can be feasibly developed given classification of site as least, moderately or highly constrained and takes into consideration the need to incorporate Best Management Practices (BMPs) for stormwater detention/water quality treatment, as described in Appendix G to this report.

³ Gross Square Footage (GSF) is the total developable building area to exterior walls, including each floor of the building (also known as the building envelope).

⁴ Assignable Square Footage (ASF) is space within a building that can be designated for a particular use; ASF is calculated as 60% of GSF.

⁵ Building height level is the number of occupied, enclosed and above grade stories of a building at the lowest adjacent ground elevation; Building height may be subject to Federal Aviation Administration (FAA) notification.

⁶ The maximum building height is defined according to the lowest adjacent ground elevation and does not include ornamental or architectural elements as parapet, mansard, equipment, turret.

⁷ Refer to Figure 3-6 for the locations of the project sites on campus and Section 8 of the Master Plan Update in Appendix B for Design Guidelines and Focus Area Guidelines for each project site.

n/a = not applicable

3.3.4 Other Campus Improvements

In addition to the 14 project sites discussed above, the Master Plan Update addresses other potential physical changes that the University would implement on campus to further its vision for optimal development of the campus in the future, specifically pertaining to mobility, circulation, and recreation as summarized below.

Loop Road and Campus Perimeter

The existing campus Loop Road alignment (Figure 3-3) would be improved to accommodate multi-modal circulation, including two-way traffic, bike lanes, and pedestrian walkway and/or trails. The expansion would enable the shifting of vehicle and bicycle circulation to the periphery of campus, and support the University's move to establish the Academic Core area within the Loop Road as a Pedestrian Priority Zone. Diagonal parking spaces would be installed where the expanded Loop Road has a minimum width of 60 feet; where Loop Road width is a minimum of 50 feet, parallel parking spaces would be installed on one or both sides of the street. No parking would occur where the existing or expanded road is too narrow (width of 42 feet). All surface parking areas would comply with current City parking design standards. Other campus roads would be re-stripped to include "Sharrow" striping and signage indicating bicycle travel lanes. Additional bicycle parking would be provided in clusters at the edge of campus and in various locations in the campus interior.

Frequent and reliable shuttle service would continue to be provided to and across campus and Alcalá Village, with the addition of numerous tram stops and/or upgrades to existing stops (Figure 3-2). Multiple tram stops are proposed along the Loop Road, as well as along internal and perimeter roads on the west and east sides of campus.

Pedestrian, Trail, and Plaza Improvements

Establishment of the Campus Core/Academic District area into a Pedestrian Priority Zone would be accomplished through the creation of a broad pedestrian promenade ("Paseo") that would generally correspond with Colachis Plaza and bisect the Academic Core or campus mesa from west to east (Figure 3-2, see Primary Pedestrian Circulation). Vehicular drop-off areas are proposed for the west and east entrances to the Paseo and non-emergency traffic would be routed to the Loop Road. As shown on Figure 3-2, three "cross-axes" are proposed in a north-south alignment across the Paseo to draw in foot traffic from areas on the north and south sides of the mesa. Up to four new traditional university-style "quads" or "commons" would be located at key intersections of the Paseo to encourage gatherings among campus users.

The campus periphery is proposed to be upgraded with more safe and direct pedestrian connections and improved community interface. As shown on Figure 3-3, the existing west entrance at the intersection of Linda Vista Road/Marian Way would be enhanced with a new vehicular drop-off, campus entry monument, and plaza which would act as the western access to the Paseo.

Master Plan Update Project Sites 17 and 19 would create a trail or sidewalk element on the west side of campus to improve pedestrian access and remove existing "shortcuts" from Linda Vista Road and the West Parking Structure to the center of campus (refer to Figures 3-2 and 3-6). The Master Plan Update also envisions extensive paths, trails, stairs, and connecting walkways across and around the rest of the campus. This would encourage foot travel while reducing vehicular dependence and

wellness with trail extensions and improved access to existing trails within Tecolote Canyon, as well as provide clear and safe connections to Marian Way, Linda Vista Road, Morena Boulevard, and the surrounding neighborhoods (Figure 3-2). Any new trail-related development along the campus' border with Tecolote Canyon would include the design features specified in the Design Guidelines and relevant Focused Area Guidelines, including (but not limited to) the requirement to maintain a low profile so as to not be visually prominent from the canyon floor, and to incorporate sensitive grading techniques.

Other specifics of proposed trail/path/circuit improvements shown in Figure 3-2 would include:

- Wayfinding, signage, an educational kiosk, and benches added to the trailheads along Tecolote Canyon;
- Enhancements to existing trail connections to campus locations such as Manchester Village Apartments;
- Enhancements to and creation of safe pedestrian crossings and paths at the Student Life Pavilion, and new Health and Wellness Center, and between the new parking garage at soccer field and Alcalá Village;
- Restoration of the stair and pathway connections from Linda Vista Road and off-campus student housing; and
- Creation of a pedestrian circuit along the campus perimeter linked to an interconnected system of trails and paths, including wayfinding and safety lighting, and site furnishings (e.g., overlooks, benches, signage, hydration stations, and trash/recycling receptacles).

MHPA Boundary Line Correction

A MHPA boundary line correction is proposed along the University's northern edge that interfaces with Tecolote Canyon (refer to Figure 5.3-1). The corrections would shift 0.61 acre of already-developed land permitted under CUP/RPO Permit No. 92-0568 (containing buildings and roads) out of the MHPA to allow the areas to be redeveloped.

3.3.5 Off-site Improvements

Various off-site curb and intersection improvements within public street right-of-way (ROW) along the edge of campus would be completed concurrently with development of Project Site Nos. 18, 23, and 30, as described below. The noted improvements would be completed in accordance with current City standards and are detailed on the Civil Engineering drawings on file with the City:

- Intersection of Linda Vista Road and Marian Way (Project Site No. 18): Existing curb ramp at northwest corner would be replaced with current standard ramps and brightly painted and textured truncated domes to ensure safe access for the disabled; a survey would confirm that existing improvements to northeast corner of intersection meet current standards.
- Cushman Place near northwest corner of campus (Project Site No. 18): City standard contiguous sidewalk would be installed along site frontage only at north end of street; any

existing driveway along site frontage (east side of street) not utilized for access for Site 18 would be removed and replaced with standard curb, gutter, and sidewalk.

- Intersection of Linda Vista Road and Josephine Street (Project Site No. 23): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard contiguous sidewalk; existing public street where Josephine Street terminates at Linda Vista Road would be vacated and the un-signalized "T" intersection would be closed. A new driveway and signalized intersection would be installed at the time of site construction.
- Intersection of Linda Vista Road and Brunner Street (Project Site No. 23): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard contiguous sidewalk; existing public street where Brunner Street meets the north side of Linda Vista Road would be vacated and the un-signalized "T" intersection would be closed. A new driveway and signalized intersection would be installed at the time of site construction.
- Segment of Linda Vista Road between Josephine Street and Brunner Street (Project Site No. 23): City standard bus stop concrete slab (length of approximately 150 linear feet) would be installed.
- Intersection of Linda Vista Road and Torero Way (Project Site No. 30): Existing curb returns and curb ramps on the northwest and northeast corners to be removed and replaced with City standard commercial driveway apron, and curb, gutter, and sidewalk.
- Segment of Via Las Cumbres fronting gated private campus driveway (Project Site No. 30): Existing private driveway and emergency access to remain; curb ramp to be installed per City standards.

3.3.6 Design Guidelines

The Master Plan Update includes general and detailed Design Guidelines that provide the primary means for consistently implementing the campus landscape and recognizable architectural character. The Design Guidelines provide direction on the physical development of the campus and support key overall planning principles and framework plans for different areas of campus as established in the Master Plan Update. More specifically, the Design Guidelines document frames the aesthetics of campus development by describing and illustrating site planning, vehicular and pedestrian circulation, parking, architecture, landscape, lighting, and signage as related to existing campus and future development. Future campus planners, architects, landscape architects, and designers of lighting, signs, and other amenities, as well as maintenance personnel, would use the USD Design Guidelines to guide their campus-related work. The Design Guidelines include General Design Guidelines and Focus Area Guidelines, as well as Sustainability Guidelines, as described below.

General Design Guidelines

The General Design Guidelines apply campus-wide and were created to guide the quality of development of each project site as well as assist with compliance with the Master Plan Update. The

General Design Guidelines would also serve as the basis for evaluation of Substantial Conformance Review (SCR) compliance for each project, which is explained in more detail later in this section.

Focus Area Guidelines

Within the Master Plan Update, the campus is broken up into 12 Focused Areas based on geographic location and the area's contribution to the character and image of the campus (refer to Figure 32 in Appendix B). The corresponding Focused Area Guidelines pertain to the proposed project sites within each area. The Focused Area Guidelines adhere to the General Design Guidelines but are presented in greater detail to show recommended site planning, building design, and spatial orientation directed at "place-making" within the campus and establishment of important pedestrian connections. Design ideas relevant to the USD campus that are communicated through the Focused Area Guidelines include:

- Building scale, massing, height, and articulation
- Building entrances, entry plazas, and circulation design
- Building setbacks, orientation, alignment, and siting
- Building screening and landscape buffers
- Parking location, design, access, and ingress/egress
- Open space opportunities and pedestrian connections
- Views, topography, and terraces
- Arcades, colonnades, passageways, and stairs

The Focused Area Guidelines apply to the 12 of 14 project sites (all but Site Nos. 20 and 28, which are not located within a Focused Area) are provided in their entirety in the Design Guidelines document within the Master Plan Update in Appendix B. More detailed, area-specific guidelines are provided for each Focused Area and are keynoted to a map and section drawing for each area. Additional illustrations are provided to communicate the desired design concept for the area. The Focused Area Guidelines would be used by design consultants at the onset of design development for each future project site to inform all manner of design decisions for that project. Similarly, USD staff should measure future construction proposals against these guidelines to determine how well the proposal meets the desired design outcome for that site, and the larger intent of the Master Plan Update. The General Design Guidelines combined with the Focused Area Guidelines would serve as the basis for evaluation under the City's SCR process (described below under Section 3.4, *Substantial Conformance Review*).

3.3.7 Sustainability Design Guidelines

The Design Guidelines document includes additional sustainability concepts that would be applied to future campus development under the Master Plan Update with the intent of designing buildings, landscapes, and open spaces in a manner that encourages resource conservation, energy efficiency, and healthy and quality living and working environments. Development of each project site is expected to address energy and climate protection measures, reduction in water use and other resources, and improvements to storm water quality; and to assess how to limit ground disturbance,

contribute to transportation strategies that reduce fuel consumption and emissions, promote recycling and waste management, and support sustainable procurement. The USD Sustainability Design Guidelines cover the topics of building design, landscape design, transportation, energy, renewable systems/natural resources, water conservation, and maintenance/waste reduction.

Building Design

In addition to the U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Silver (or equivalent) requirement, buildings would be designed to allow for natural ventilation and other passive outdoor space-cooling techniques, natural light penetration through design elements and materials, use high quality and durable building materials, re-use existing site materials and/or incorporate materials with recycled content, use regional and rapidly renewable materials, and integrate active solar technologies such as photovoltaic panels on rooftops of buildings and parking structures.

Landscape Design

Landscape design guidelines focus on the selection of appropriate plant species, specifically those which are best suited for a site's particular microclimate(s) and exposures. Careful species selection result in reduced water use, reduced maintenance, and improved plant success. Canopy trees would be used to provide solar shading of buildings, surface parking, and outdoor spaces, while deciduous trees would provide summer shade but allow winter sun. Where possible, roof gardens are encouraged to reduce solar heat gain, planting areas should be mulched to prevent water loss, and all manner of permeable hardscape alternatives should be used whenever possible to assist with compliance with storm water regulations.

Transportation

Students, staff, and faculty would be encouraged to reduce dependencies on single-occupancy vehicles by considering ecologically aware modes of transportation (e.g., bicycle, trolley, bus, etc.), and through incentivizing carpooling and transit usage, and providing preferred parking for alternative fuel vehicles, along with electric vehicle charging stations (powered by photovoltaic shade structures, where feasible).

Energy

Buildings would be sited to take advantage of natural daylight and prevailing winds, designed to maximize energy efficiency, and oriented and designed to reduce heat gain and minimize cooling load. Designers should be aware of the different micro-climates of the campus (due to topography, prevailing sea breezes, and solar orientation).

Renewable Systems/Natural Resources

Design of construction sites would incorporate techniques that promote natural resource conservation where feasible, including the use of photovoltaic panels to help offset campus power and heating requirements, solar domestic water heating systems in future housing developments, and green roofs to help minimize solar heat gain.

Water Conservation

Design of construction sites would incorporate efficient irrigation systems with automated and weather-sensing systems; turf areas would be limited to space with programmed uses and replaced, removed, or converted to drought-tolerant plantings in un-programmed areas; alternative irrigation sources would be provided through use of grey water (including condensate from heating, ventilation, and air conditioning [HVAC] cooling coils), rainwater harvesting, or municipal recycled water (purple pipe); water-efficient plumbing fixtures would be provided; bioswales and bioretention areas would be used to reduce runoff and improve water quality; and appropriate plant species (including natives where feasible) would be selected for varying micro-climates and exposures to reduce maintenance and water use.

Maintenance/Waste Reduction

Incorporation of thoughtful planting design (e.g., incorporating setbacks from hardscape, not over-pruning) reduces maintenance needs and associated resource consumption. A campus recycling program would be maintained, including provision of a dedicated area for collection and sorting of recyclable materials and recycling bins throughout campus. The campus would consider providing composting bins at all campus dining facilities and partnering with local farms that may use the composted material created on campus. The campus would continue partnering with local landfills for disposal of landscape maintenance waste and off-campus recycling/composting.

3.3.8 Sustainability Features

The Master Plan Update would implement a number of project design features that are specifically directed toward increasing campus sustainability, as discussed below.

Land Use

The Master Plan Update would reclaim inefficient sites, surface parking lots, and under-utilized areas for new buildings that make better use of space and site. Where possible, the plan repurposes existing structures to meet growing and changing space needs rather than immediately planning for new development to meet such needs. Open spaces would be preserved in areas throughout campus. The extension of the Colachis Plaza as the Paseo along Marian Way and Torero Way would convert pavement to permeable surface, allowing better rainwater management and reducing the number of heat islands. Synergies among campus uses would be encouraged, so that space on campus could be shared and programs would be allowed to collaborate and make the most efficient and best use of space.

Development Density

Under the Master Plan Update, campus growth would focus on an “infill” approach with greater intensity at the campus core and a clustering of living-learning environments. Programs would not be interspersed on the mesa, but interconnected. Additional on-campus housing is proposed to satisfy the first- and second-year housing requirement and reduce the number of daily automobile trips to and from the campus.

Transportation Management

By removing cars from the center of campus as part of the Colachis Plaza extension (Paseo), Pedestrian Priority Zone, and focused development within the mesa, the internal campus circulation would become more pedestrian and bicycle oriented. This strategy, along with the implementation of a Transportation Demand Management plan (as outlined in Section 5.2, *Transportation/Circulation*), improved shuttle connections and service described above, increased on-campus housing, and parking policies and fees, would help to reduce growth in parking demand and vehicle trips. Existing ride and car share programs would continue to be supported by the University with implementation of the Master Plan Update, along with the provision of electric vehicle parking and charging stations.

Building and Landscape Design Strategies

Buildings and landscape would be designed to include courtyards, gardens, and natural-ventilation to reduce the need for air conditioning and improve the indoor-outdoor environment. Expansion and design of new and enhanced open space on the mesa would permit better space for outdoor teaching and recreation, helping to reducing indoor energy demand. Where feasible, storm water management strategies potentially utilizing a combination of permeable pavement, planted bioswales, and filtration devices would be incorporated into the Loop Road improvements described above. Also, where feasible, permeable pavers or porous concrete would be installed in surface parking areas. Additionally, sustainability within the landscape would be increased through incorporation of storm water infiltration and retention, reduction in potable water use, reduction in turf areas, installation of drought-tolerant landscaping, habitat restoration/preservation, and use of materials with recycled content. The use of turf grass or lawn would be limited to areas where access/active use is a priority; it would not only be used as a visual enhancement. In addition, all new buildings and additions on campus would meet minimum energy saving and sustainable design standards for LEED Silver (or equivalent) ratings.

3.4 Substantial Conformance Review

As part of the CUP procedures set forth in SDMC Section 126.0301, the City provides that the University may submit construction site plans to City staff for “Substantial Conformance Review” in order to make a determination whether a construction site identified in the Master Plan Update is consistent and in conformance with the approved CUP and SDP. Whenever USD submits a proposal for construction, City staff would evaluate the proposal for consistency with the CUP and SDP, the Final SEIR, and the Master Plan Update and Design Guidelines under the SCR process. As stated in the Municipal Code:

“The purpose of these procedures is to establish a review process for the development of uses that may be desirable under appropriate circumstances, but are not permitted by right in the applicable zone. The intent of these procedures is to review these uses on a case-by-case basis to determine whether and under what conditions the use may be approved at a given site.”

The SCR process includes a review of construction proposals against the approved exhibits, permit conditions, environmental documentation, applicable land use policies, and the public record for the

prior permit. City staff will recommend approval of the construction proposal if it falls within the parameters of the prior approval. A SCR decision for the USD Master Plan Update proposals would be at Staff level (i.e., Process 1). Substantial conformance shall be determined based on the locations, descriptions, and building areas specified on the construction site maps and in the construction site matrices contained within the Master Plan Update. As an alternative to submitting for SCR, USD may choose to include their proposed changes as part of a complete construction permit application (building permit, grading permit, public improvement permit, etc.).

Per the current CUP/RPO Permit, City staff may make one of the following determinations at the conclusion of the SCR process:

- Find the construction proposal meets the criteria in the permit, the EIR certified with the permit (i.e., the SEIR), and the Master Plan and Design Guidelines. As long as the impacts of the construction proposal were analyzed in the SEIR, and the proposal is within a reasonable range of the overall building envelope specified by the Master Plan and CUP and SDP, no further environmental review is required and administrative approval would be granted.

OR

- Find the proposal is not in substantial conformance with the permit.
- Require a site-specific permit amendment for a proposal not in conformance with the permit.
- If necessary, require a site-specific environmental review for a proposal not in conformance with the certified SEIR.

3.5 Discretionary Actions

The SEIR is intended to provide documentation pursuant to CEQA to cover all local, regional, and state permits and/or approvals which may be needed to implement the proposed Master Plan Update. The anticipated discretionary approvals are summarized below.

3.5.1 Conditional Use Permit Amendment

A CUP would be required to replace and amend the existing permit (as currently amended) and allow for the continued institutional use within the residential zone.

3.5.2 Site Development Permit

The SDP would allow the campus to impact Environmentally Sensitive Lands (ESL), specifically sensitive biological resources (i.e., 0.5 acre of upland habitat and Multiple Species Conservation Program (MSCP) covered species), and 0.3 acre of naturally occurring steep slopes. No impacts to wetland resources would occur. The SDP would provide authorization to USD, as a third-party beneficiary, for impacts to coastal sage scrub and covered species under the MSCP. ESL Findings would be required for SDP approval.

A SDP is also required due to proposed deviations from the base residential zones. Deviations from the base residential zones are described in the Design Guidelines and include the following:

- A deviation to the RS-1-7 base zoning for Height from 24/30 feet required to the heights specified in Table 3-1;
- A deviation to the RS-1-7 base zoning for Floor Area Ratio from 0.45 to 0.60 across the entire campus;
- A deviation to the RM-1-1 base zoning for Height from 30 feet required to the heights specified in Table 3-1; and
- A deviation to the RM-3-7 base zoning for Height from 40 feet required to the heights specified in Table 3-1.

The Design Guidelines would become an exhibit to the SDP and serve as the site-specific development regulations for the USD campus.

3.5.3 Public Utility Easement Vacations

There are over 370 public easements that encumber the campus. Five City water facilities easements and one City storm drain easement would be vacated as part of the new CUP, as shown on the Civil Engineering exhibits on file with the City. The formal easement vacations and associated new easement dedications would be processed separately as part of future project applications under the Master Plan Update.

3.5.4 Other Agency Approvals

Approval of the National Pollutant Discharge Elimination System (NPDES) requirements from the State Water Resources Control Board (SWRCB) would also be necessary to address water quality issues during and post-construction. Regulations governing water quality and project permitting requirements are outlined in Section 5.6, *Hydrology/Water Quality*.

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Source: M.W. Steele 2016



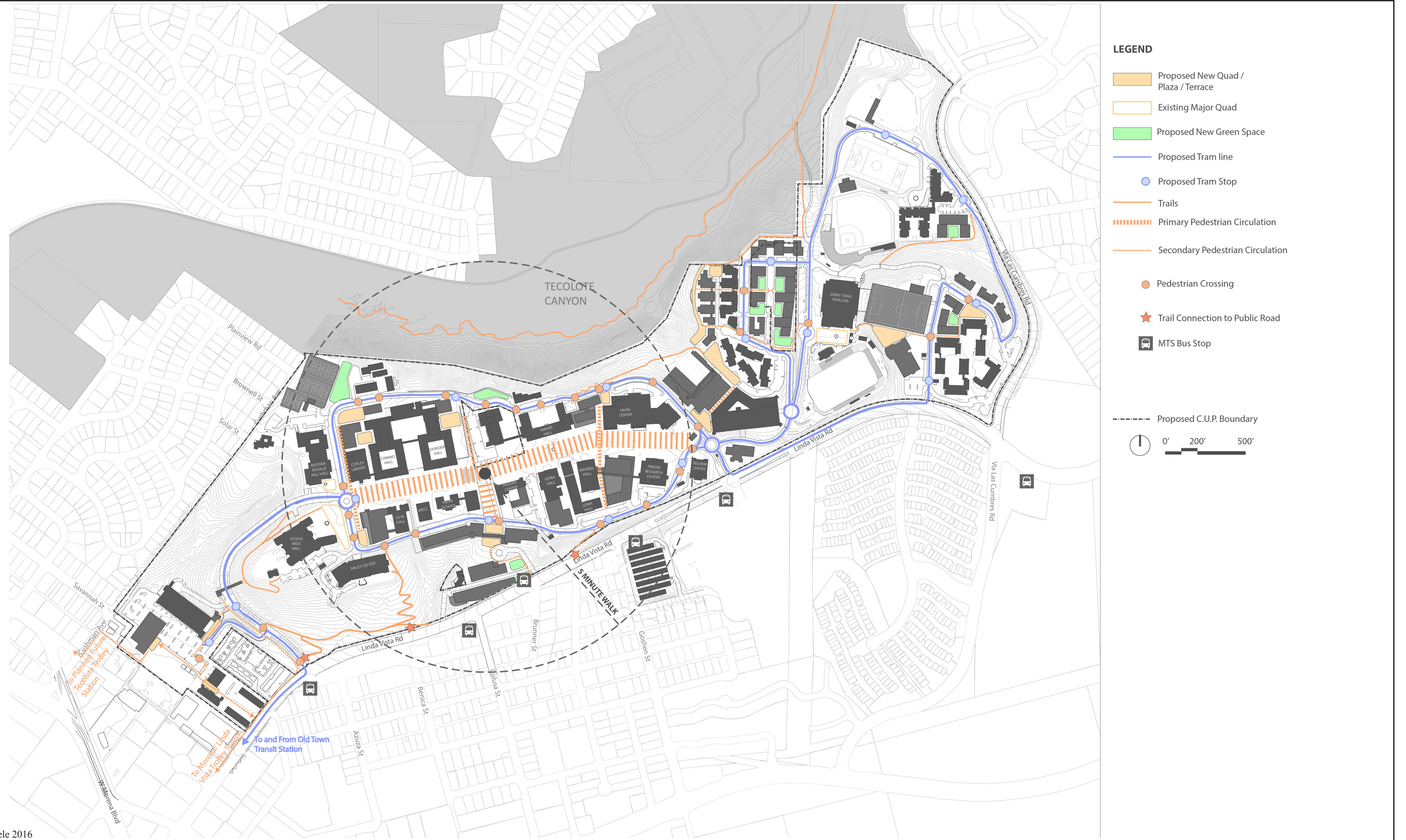
USD Site Plan - Existing, Entitled and Proposed

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 3-1

I:\PROJECTS\MMWS\MWS-01_USDMap\ER\Fig-3-2_Pedestrian_tram_Circulation.mxd MWS-01 10/20/16-CL

Source: M.W. Steele 2016



Pedestrian and Tram Circulation and Connectivity

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 3-2

I:\PROJECTS\MMWS\MWS-01_USDMap\VEIR\Fig-3-3_BicycleMultiModalCirculation.indd MWS-01 03/07/17 CL

Source: M.W. Steele 2016



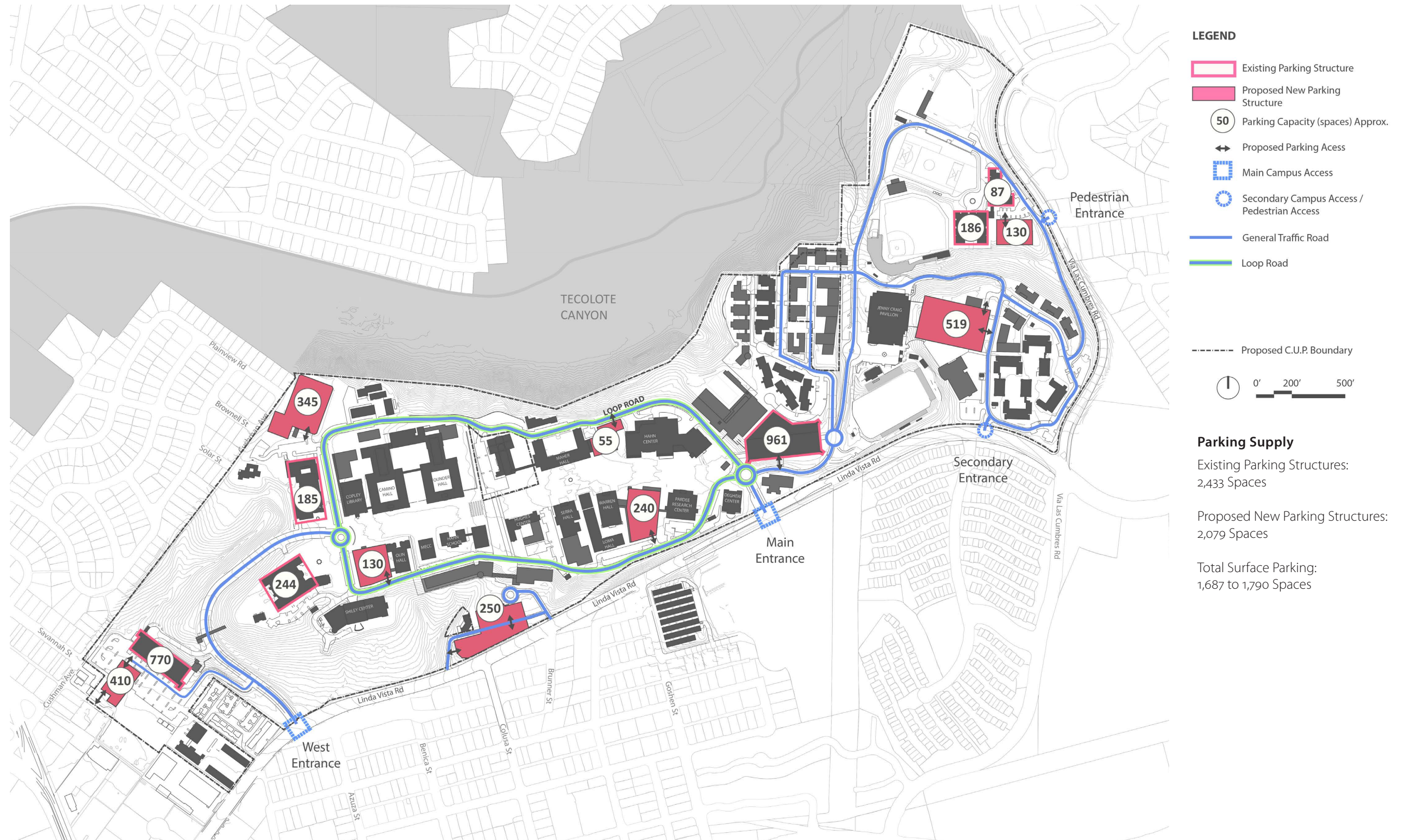
Bicycle and Multi-modal Circulation

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 3-3

I:\PROJECTS\MMW\MMWS-01_USD\Map\EIR\Fig3-4_VehicleCirculation.mxd MWS-01 03/07/17-CL

Source: M.W. Steele 2016



Vehicle Circulation and Parking Structures

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Source: M.W. Steele 2016



Tree and Planting Strategies

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

4.0 HISTORY OF PROJECT CHANGES

In response to the City's initial review of the Master Plan Update, staff requested that the plan be expanded to include a framework for addressing potentially historic resources suggested in the Archaeological Resource Report Form completed for the project.

In response to comments received from City Geology staff, the University revised the footprint for Project Site No. 18 to provide a greater setback from active stands of the Rose Canyon fault zone, located near the western edge of campus.

A greater setback from the Multi-habitat Planning Area (MHPA) on campus associated with Tecolote Canyon was incorporated into Project Site No. 27 to allow for Zone 1 brush management (brush clearing) to occur within the defined construction footprint of the site. With this change, no direct impacts to the MHPA would occur.

The trail associated with Project Site No. 17 was realigned to avoid all impacts to Tier I habitat (maritime succulent scrub) and mitigation to that habitat is no longer required.

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5.0 ENVIRONMENTAL ANALYSIS

5.1 Land Use

The following section discusses land uses and policies that are applicable to the Project. It references planning and environmental information contained in other sections of this Subsequent Environmental Impact Report (SEIR), as applicable.

5.1.1 Existing Conditions

On-site Land Uses

The campus is a private, four-year university that was founded by the Catholic Diocese of San Diego and chartered in 1949. Through the merger of the College of Men and San Diego College of Women, the University was established as USD in 1972. The majority of the property is developed and supports campus facilities (academic buildings, sports facilities, parking lots, etc.) and ornamental landscaping as shown in an aerial photograph of the property (Figure 2-2). USD currently enrolls 7,000 full-time equivalent (FTE) students consisting of both undergraduate and graduate students.

The buildings on the USD campus are designed and built in a distinctive 16th Century Spanish Renaissance architectural theme with plazas, gardens, courtyards, arcades and the Marian Way Mall and Colachis Plaza, as specified in the 1996 Master Plan. Several of the structures were constructed during the early establishment of the campus. Landmark buildings that occur on campus that are visible from off-campus locations include the Church of the Immaculata, as well as the Joan B. Kroc Institute for Peace and Justice and Shiley Center for Science and Technology. These structures contribute to the character of the Linda Vista community and to the city's skyline, although the Church of the Immaculata is not a part of the Master Plan.

Academic uses are generally concentrated on the west end of campus, with professional programs arranged in a line of buildings that stretches across the south side of Marian Way and Colachis Plaza and almost to the Marian Way entrance of campus. The eastern end of campus is predominantly used for residential and athletic purposes. A main defining element of the campus is the pedestrian mall along Marian Way. The central portion of Marian Way is closed to cars and referred to as Colachis Plaza. In contrast to the highly manicured landscaping of the central campus, the surrounding landscape is natural and rugged, particularly along the southern edge facing Linda Vista Road and the northern edge that enters Tecolote Canyon (Figure 2-3). Photographs that illustrate the character of the University and the various land uses in the area are contained in Section 5.8, *Visual Effects/Neighborhood Character*.

Surrounding Land Uses

Surrounding existing land uses include commercial/industrial development and residential housing in the Morena Boulevard area to the west of the campus, student and non-student multi-family housing immediately to the south, and various types of residential development and other institutional uses, such as Mark Twain High School, Francis Parker School and the San Diego County Office of Education to the east. Tecolote Canyon Natural Park contains undeveloped regional open

space to the north. The City's Multi-habitat Planning Area (MHPA) occurs on approximately 7.6 acres along the northern edge of the campus and extends offsite into Tecolote Canyon. The campus is located within the Airport Influence Area (AIA) for San Diego International Airport and Montgomery Field.

Applicable Plans and Policies

Plans, policies and ordinances that pertain to land use for the Project are contained in elements and policies of the General Plan (including the City's Climate Action Plan), Linda Vista Community Plan, City Land Development Code (LDC) regulations, Multiple Species Conservation Program (MSCP) Subarea Plan, Tecolote Canyon Natural Park Master Plan, Tecolote Canyon Rim Development Guidelines, Tecolote Canyon Natural Resources Management Plan, San Diego International Airport (SDIA) and Montgomery Field Airport Land Use Compatibility Plans, Regional Air Quality Strategy (RAQS), and Water Quality Control Plan (WQCP) for the San Diego Basin. The applicable policies of these plans, ordinances, and regulations are described below.

City of San Diego General Plan

The City approved its General Plan on March 10, 2008. The General Plan is a comprehensive, long-term document that sets out a long-range vision and policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego. Accordingly, the General Plan "provides policy guidance to balance the needs of a growing city while enhancing quality of life for current and future San Diegans" (City 2008a). The General Plan is comprised of a Strategic Framework section and ten elements including: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Historic Preservation; Noise; and Housing. An update to the General Plan Housing Element was adopted by the City Council in March 2013. The following discussion summarizes each element that is relevant to the Project; the Housing Element does not contain policies applicable to the Project. In addition, applicable goals within each element pertaining to the Project are evaluated in detail as presented in Table 5.1-1, *City of San Diego Land Use Goals, Objectives, and Policies Consistency Evaluation*. Because of its length, Table 5.1-1 is placed at the end of this section.

Land Use and Community Planning Element

The purpose of the Land Use and Community Planning Element (Land Use Element) is "to guide future growth and development into a sustainable citywide development pattern, while maintaining or enhancing quality of life in our communities" (City 2008a). The Land Use Element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies, as needed. The Land Use Element establishes a structure that respects the diversity of each community and includes policies that govern the preparation of community plans. The Land Use Element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, annexation policies, balanced communities, equitable development, and environmental justice. The Project site is designated as Commercial Employment, Retail and Services; Residential; and Parks, Open Space and Recreation on Figure LU-2, *General Plan Land Use and Street System*, in the General Plan.

Mobility Element

The purpose of the Mobility Element is “to improve mobility through development of a balanced, multi-modal transportation network” (City 2008a). The element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses. The Mobility Element’s policies promote a balanced, multimodal transportation network that gets people where they want to go while minimizing environmental and neighborhood impacts. The Mobility Element contains policies that address walking, streets, transit, regional collaboration, bicycling, parking, the movement of goods, and other components of a transportation system. Together, these policies advance a strategy for relieving congestion and increasing transportation choices.

Urban Design Element

The purpose of the Urban Design Element is “to guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the City” (City 2008a). The Urban Design Element policies capitalize on San Diego’s natural beauty and unique neighborhoods by calling for development that respects the natural setting, enhances the distinctiveness of its neighborhoods, strengthens the natural and built linkages, and creates mixed-use, walkable villages throughout the City. Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the Urban Design Element influences the implementation of all of the General Plan’s elements and community plans. It sets goals and policies for the pattern and scale of development as well as the character of the built environment.

Economic Prosperity Element

The purpose of the Economic Prosperity Element is “to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy” (City 2008a). The element links economic prosperity goals with land use distribution and employment land use policies. The Economic Prosperity Element includes economic development policies that have an indirect effect on land use. These policies are intended to support existing and new businesses that reflect the changing nature of industry, create the types of jobs most beneficial to the local economy, and prepare the workforce to compete for these jobs in the global marketplace. Additional policies encourage community revitalization through improving access to regional and national sources of public and private investment, target infrastructure development to support economic prosperity, and encourage using the leverage offered by the redevelopment process in certain communities.

Public Facilities, Services, and Safety Element

The purpose of the Public Facilities, Services, and Safety Element (Public Facilities Element) is “to provide the public facilities and services needed to serve the existing population and new growth” (City 2008a). This element contains policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation, as well as park and recreation facilities and services. The element also provides policies to guide the provision of a wide range of public facilities and services, including fire-rescue,

police, wastewater, storm water infrastructure, water infrastructure, waste management, libraries, schools, information infrastructure, public utilities, regional facilities, healthcare services and facilities, disaster preparedness, and seismic safety.

Recreation Element

The Recreation Element contains policies which “preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users.” The Recreation Element provides policies to guide the City’s vision and goals for park and recreation facilities citywide and within individual communities. It provides guidelines for the provision of population-based, resource-based, and open space parks and calls for the preparation of a comprehensive Parks Master Plan. Recreation Element policies also support joint use and cooperative agreements, protection and enjoyment of the City’s canyonlands, creative methods of providing “equivalent” recreation facilities and infrastructure in constrained areas, and implementation of a financing strategy to better fund park facility development and maintenance.

Conservation Element

The purpose of the Conservation Element is “to become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich and natural resources that help define the City’s identity, contribute to its economy, and improve its quality of life” (City 2008a). The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego’s environment, that help define the City’s identity, and that are relied upon for continued economic prosperity. San Diego’s resources include, but are not limited to, water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The Conservation Element contains policies for sustainable development; preservation of open space and wildlife; management of resources; and other initiatives to protect the public health, safety, and welfare.

Noise Element

The purpose of the Noise Element is “to protect people living and working in the City from excessive noise” (City 2008a). The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. Refer to Section 7.1.6, *Noise*, for the specific goals and objectives of the Noise Element that apply to the Project.

Historic Preservation Element

The purpose of this element is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. To improve the quality of the built environment, encourage appreciation for the City’s history and culture, maintain the character and identity of communities, and contribute to the City’s economic vitality through historic preservation.

Climate Action Plan

The City adopted its Climate Action Plan (CAP) in December 2015 and its CAP Consistency Checklist in July 2016. The CAP serves as mitigation for the City's 2008 General Plan (City of San Diego 2015). The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 Climate Protection Action Plan that identifies actions and programs to reduce the Green House Gas (GHG) emissions of the community-at-large, and City operations. ~~Additionally, with future implementing actions, it is anticipated that the CAP will serve as a "Qualified GHG Reduction Plan" for purposes of tiering under CEQA.~~ The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan and consistency with the underlying land use assumptions in the CAP.

Linda Vista Community Plan

The Linda Vista community, comprising about 2,400 acres, is located on the southwestern portion of Kearny Mesa, overlooking Mission Bay and Mission Valley. The Community Plan was originally adopted in 1983 and was updated in 1998. Subsequent amendments to the current plan were adopted in 2007 and 2011. The Community Plan also serves as Local Coastal Program Land Use Plan for properties within the community that also reside within California Coastal Zone. The Linda Vista Community Plan and Local Coastal Program Land Use Plan is the City's statement of policy regarding growth and development of the Linda Vista community planning area. The plan proposes goals, policies, and strategies for land uses and public facilities. The plan designates areas for residential, commercial, industrial, and public uses, as well as areas that are to remain undeveloped. The document establishes the basis for development regulations, including such measures as zoning designations and development impact fees, and for the expenditure of public resources within the community. Goals and policies for the Community Plan are contained within a series of elements, including Residential, Commercial & Industrial, Open Space, Community Facilities, Transportation, and Urban Design.

The University of San Diego (University or USD) is located within the Linda Vista Community Plan area, outside of the Coastal Zone. The majority of the campus is designated for institutional use, while a small amount of open space is designated that generally corresponds with the deed restricted areas identified in the existing Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) (Figure 2-3). An alternative land use designation for the campus, low-density residential with a Planned Development Permit, is identified in the Community Plan should the campus ever close.

According to the Community Plan, development on the USD campus shall be guided by the approved CUP/RPO and Master Plan Development Guidelines. Any new development under future amendments to the CUP should continue to maintain the simplified 16th Century Spanish renaissance architectural style and maintain a strong pedestrian access spine through the central portion of the campus. Further, surface parking areas should be discouraged in favor of structured parking on the eastern and western edges of campus, and parking should be designed to include

landscaping and trees where surface parking is provided. Where parking structures are provided, rooftops should incorporate shade structures.

City LDC Regulations

Zoning

Zoning regulations for the campus are governed by the LDC contained in the San Diego Municipal Code (SDMC). The majority of the Project site is located within the Residential zones (RS-1-7, RM-1-1, and RM-3-7) with small areas zoned Open Space (OR-1-1 and OP-2-1) and Commercial (CC-4-2, CC-4-5, and CC-5-4) (refer to the existing zoning on campus depicted in Figure 2-4). The RS-1-7 zone provides for single-family residential use or residential development with 5,000-acre minimum lots; the RM zones allow for multi-family residential uses featuring one dwelling unit (du) for 3,000 square feet of lot area. The purpose of "CC" zones is to accommodate community-serving commercial services, retail uses and limited industrial uses of moderate intensity and small to medium scale. The campus is also located in the Community Plan Implementation Overlay Zone (CPIOZ) Type A and Parking Impact Overlay Zone (Campus Impact Area).

Conditional Use Permit

The intent of the CUP regulations is to review certain uses on a case-by-case basis to determine whether and under what conditions the use may be approved at a given site. As stated in Section 126.0301 of the LDC, each use should be developed so as to fully protect the public health, safety, and welfare of the community. To provide this protection, conditions may be applied to address potential adverse effects associated with the proposed use.

Environmentally Sensitive Lands

The City regulates development of Environmentally Sensitive Lands (ESLs) through its ESL Regulations (LDC Section 143.0101 et seq.). The RPO in place in 1996 was replaced by the ESL Regulations in 2000. The purpose of the ordinance is to "protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands." ESLs are defined to include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Applicable ESL requirements for the Project are associated with sensitive biological resources, as detailed in Section 5.3, *Biological Resources* and steep hillsides (with no coastal beaches, sensitive coastal bluffs, or 100-year floodplains to affect, or be affected by, the Project) described under *Visual Effects/Neighborhood Character* (Section 5.8).

In accordance with ESL Regulations, a Site Development Permit (SDP) is required due to Project impacts to sensitive biological resources and steep slopes (all of which are considered ESL resources). The purpose of a SDP is to establish a review process for proposed development that may have significant impacts on resources or on the surrounding area. An SDP may be required even if the site is developed in conformance with all applicable regulations. As stated in Section 126.0501 of the SDMC, "The intent of these procedures is to apply site-specific conditions as necessary to assure that the development does not adversely affect the applicable land use plan and to help ensure that all regulations are met." An SDP may be approved only if specific findings can be made.

Historic Resources Regulations

Chapters 11, 12, and 14 of the SDMC establish the Historical Resources Board authority, appointment and terms, meeting conduct, and powers and duties; the designation process including the nomination process, noticing and report requirements, appeals, recordation, amendments or rescission, and nomination of historical resources to state and national registers; and development regulations for historical resources. The purpose of these regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego. The historical resources regulations require that designated historical resources, important archeological sites, and traditional cultural properties be preserved unless deviations findings can be made by the decision-maker as part of a discretionary permit. Minor alterations consistent with the U.S. Secretary of the Interior's Standards are exempt from the requirement to obtain a separate permit but must comply with the regulations and associated Historical Resources Guidelines. Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval.

The Historical Resources Guidelines, located in the City's Land Development Manual, provide property owners, the development community, consultants, and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process. The guidelines also address the need for a survey and how impacts are to be assessed, available mitigation strategies and report requirements. They also include appropriate methodologies for treating historical resources located in the City.

MSCP Subarea Plan

The Natural Communities Conservation Plan (NCCP) initiated by the State of California in 1991 resulted in the promulgation of the special 4 (d) rule of the Federal Endangered Species Act (ESA). This rule focuses on conserving coastal sage scrub habitat in order to avoid the need for future federal and state listing of each individual coastal sage scrub-dependent species. The City of San Diego, County of San Diego, U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and other local jurisdictions collaborated in the late 1990s to develop the MSCP.

The MSCP is a comprehensive biological habitat conservation planning program developed by the City and other local jurisdictions in coordination with state and federal resource agencies. A goal of the MSCP is to preserve a network of habitat and open space, protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans. The City's MSCP Subarea Plan (City 1997b) guides the establishment of the City's preserve system, the MHPA.

The Project site is located partially within the MHPA of the MSCP; the Project must comply with the provisions of the MSCP Subarea Plan as shown in Figure 5.1-1, *Multi-Habitat Preserve Area/Environmentally Sensitive Lands*, and discussed in detail in Section 5.3, *Biological Resources*. Approximately 7.6 acres of the northern edge of the campus occur within the MHPA (refer to Figure 5.3-1). All development proposals within and adjacent to the MHPA, as well as grading during wildlife breeding seasons, are required to be consistent with the City's MSCP Subarea Plan, including the Land Use Adjacency Guidelines. Development must avoid impacts to narrow endemic species in the MHPA, although none exist on the Project site. Encroachment into sensitive biological resources

outside of the MHPA is allowed provided impacts are analyzed and appropriate mitigation is implemented in accordance with the City's Biology Guidelines (City 2012).

Land uses adjacent to the MHPA are to be managed to ensure that indirect impacts to the MHPA are minimized. The City has published Land Use Adjacency Guidelines, as part of the City's MSCP Subarea Plan, which outline these management requirements and address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development. Projects proposed adjacent to the MHPA will be conditioned to comply with the Land Use Adjacency Guidelines applicable to the project site.

Tecolote Canyon Natural Park Master Plan

The Tecolote Canyon Natural Park Master Plan (Park Master Plan) was adopted in 1983 and provides an inventory of environmental resources, addresses social qualities, analyzes current conditions, recommends measures for restoration and preservation of significant features, and provides recommendations for the future development of the park. In the Park Master Plan, the park is divided into subareas for planning purposes; USD is adjacent to Subarea A. The University is recognized in the Park Master Plan as a private institution that "will permit organized groups the use of their parking lot and entry from the bus stop," provided permission is granted. The Park Master Plan serves as the primary planning document for the Park and recommends discretionary review of all projects located adjacent to the Park.

Tecolote Canyon Rim Development Guidelines

The guidelines set forth in the Tecolote Canyon Rim Development Guidelines (City 1987) are only to be used in the area adjacent to Tecolote Canyon. The intent of the guidelines is to assure that development along the rim of the canyon occurs in such a way that native habitat within the canyon is enhanced and protected from damage associated with development. The document provides guidelines for structures, traffic circulation, grading, drainage, landscaping, and fire protection.

Tecolote Canyon Natural Park Natural Resources Management Plan

Adopted in 2006, the purpose of the Tecolote Canyon Natural Park Natural Resources Management Plan (NRMP) is to provide guidance for the management, maintenance, utilization and development of the Park while preserving the Park's natural and cultural resources. This NRMP is intended not only to make provisions for the protection and preservation of natural and cultural resources, especially sensitive resources, but also to allow safe and accessible use of the Park to meet the needs of the surrounding communities. The NRMP provides for the maintenance and preservation of the Park's natural environment and associated visual enjoyment of the Park's open space.

San Diego International Airport and Montgomery Field Airport Land Use Compatibility Plans

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or a general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses. The San Diego County Regional Airport Authority (SDCRAA) serves as the

ALUC for SDIA and Montgomery Field, the two closest public aviation facilities nearest the USD campus; the airports are approximately 1 mile and 3 miles, respectively away. The campus is within the AIA for both facilities.

The AIA for both SDIA and Montgomery Field serves as the planning boundaries for the Airport Land Use Compatibility Plan (ALUCP) for those airport facilities and is divided into two review areas: (1) Review Area 1 is comprised of the noise contours, safety zones, airspace protection surfaces, and overflight areas; and (2) Review Area 2 is comprised of the airspace protection surfaces and overflight areas. The USD campus is within Review Area 2 for SDIA and Montgomery Field.

The ALUCPs were adopted to establish land use compatibility policies and development criteria for new development within the AIAs to protect the airport from incompatible land uses and provide the City with development criteria that will allow for the orderly growth of the area surrounding the airports. The policies and criteria contained in the ALUCPs are addressed in the General Plan (Land Use and Community Planning Element and Noise Element) and implemented by the supplemental development regulations in the Airport Land Use Compatibility Overlay Zone within Chapter 13 of the SDMC.

Regional Air Quality Strategy (RAQS)

The Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The San Diego County Regional Air Quality Strategy (RAQS) is updated on a triennial basis, most recently in 2009. The RAQS outlines APCD's plans and control measures designed to attain the state air quality standards for ozone. The APCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act for areas that are out of attainment of air quality standards. The SIP, approved by the U.S. Environmental Protection Agency (USEPA) in 1996, includes the APCD's plans and control measures for attaining the ozone national standard. The SIP is also updated on a triennial basis.

The RAQS relies on information from California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the APCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for ozone.

Water Quality Control Plan for the San Diego Basin

The Regional Water Quality Control Board (RWQCB) adopted a Water Quality Control Plan (WQCP) for the San Diego Basin (Basin Plan) that recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground and surface waters, and local water quality conditions and problems (RWQCB 1994). The Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters.

5.1.2 Impact

Issue 1: Would the proposal result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located?

Issue 2: Would the proposal require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), land use policy impacts may be significant if the Project would be:

- Inconsistent or conflict with the environmental goals and/or objectives of a community or general plan;
- Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts;
- Substantially incompatible with an adopted plan; and/or
- Cause the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive use.

Impact Analysis

Previously Disclosed Land Use Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR concluded that the USD Master Plan would implement the goals, objectives and recommendations of the City's Progress Guide and General Plan, Community Plan, Park Master Plan and Tecolote Canyon Rim Guidelines, and land use policy conflicts were determined to be less than significant.

The 1996 FEIR did, however, require portions of the campus containing biologically sensitive lands and steep hillsides to be protected through the recordation of a Deed Restriction since the 1996 Master Plan would encroach into more than the permitted amount of hillsides and biologically sensitive lands on campus, as defined by the City's Resource Protection Ordinance (RPO). The Deed Restriction can be rescinded and rerecorded through City Council action if an amendment to the current CUP/RPO permit is proposed which modifies the permitted uses within the Deed Restricted areas (refer to Appendix D to this SEIR for the specific language).

Impacts from the Master Plan Update

The following discussion focuses on the potential policy consistencies or inconsistencies associated with the revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Consistency with General Plan and Community Plan

The Master Plan Update would be consistent with the campus' designated use in the General Plan and Community Plan as described below and outlined in Table 5.1-1. As shown in the table, the Project would be consistent with applicable policies from the Land Use and Community Planning Element, Mobility Element, Urban Design Element, Public Facilities, Services and Safety Element, Recreation Element, Conservation Element, Noise Element (as discussed further under Issue 4), and Historic Preservation Element of the General Plan. Many of the policies that the Project is consistent with are also cited in the City's Climate Action Plan (CAP). In addition, the Project would comply with applicable elements of the Linda Vista Community Plan, including the Residential Element, Community Facilities Element, Open Space Element, Community Facilities Element, Public Facilities Element, Transportation Element, and Urban Design Element. Specific examples of the Project's compliance are provided below.

The Project would implement the City's General Plan mobility and conservation policies through a combination of vehicular, bicycle and pedestrian circulation improvements that would enhance movement within the campus, encourage alternative methods of travel, and implement transportation demand management practices to minimize its impact on the local circulation system. In terms of urban design, new structures, hardscape and landscape elements would be designed in accordance with the City's policies and guidelines in the Master Plan Update to minimize impacts to natural landforms, blend with existing development, and reflect the 16th Century Spanish Renaissance architectural style established on the USD campus. Adequate public facilities and services would be provided as the campus student population increases over time, consistent with the General Plan policies. Recreational facilities would be expanded in conjunction with campus growth, including maintaining access to regional parks such as Tecolote Canyon as envisioned in the General Plan. Sustainability practices would be expanded and features would be integrated into campus development to minimize its carbon dioxide footprint within the City and region. The University would conserve open spaces and natural landforms that interface with the central mesa consistent with the City's conservation goals by concentrating development in the core of the campus. Noise within the community would be minimized consistent with the noise limits in the General Plan through a combination of proper siting of uses and continued implementation of alternative transportation programs as part of a Transportation Demand Management (TDM) Program to reduce off-campus traffic. Proper treatment of historic resources on campus would be implemented in accordance with the City's historic preservation policies.

Implementation of the Master Plan Update would focus new structures and facilities toward the interior of campus so as to minimize potential effects on the Linda Vista community (Table 5.1-1). Reliance on the Design Guidelines would ensure new buildings would follow the existing architectural theme established on campus, minimize impacts to natural landforms and protect open space within the community. Implementation of parking and traffic improvements outlined in the Transportation Impact Analysis would minimize traffic flow through the community. Compliance with City regulations pertaining to hillsides, biological resources, and water quality would ensure the Project's compliance with the community's policies to protect such resources. Furthermore, construction of new parking on campus and reliance on existing and expanded alternative transportation programs would minimize the campus' impact on the community.

Consistency with the Other Applicable Plans

Applicable plans to the Project include the Tecolote Canyon Natural Park Master Plan and Tecolote Rim Development Guidelines; Project compliance with the Tecolote Canyon Natural Resource Management Plan is addressed under Issue 3. The Master Plan Update would be consistent with the Master Plan and Rim Development Guidelines for Tecolote Canyon Natural Park as shown in Table 5.1-1. Tecolote Canyon Natural Park is adjacent to the USD campus as shown in Figure 2-2. For example, the Project would preserve canyon slopes in open space, and not place grading, landscaping or utilities in the Park. The University would redevelop existing developed areas on campus in a manner that would not wall off the canyon and would set development back from the canyon edge. In addition, the campus would comply with all applicable City standards with regard to brush management, lighting, and other features that could affect the Park and its users.

Consistency with the Land Development Code

Due to height limits specified in the residential development regulations for the underlying residential zone (RS-1-7 and RM-1-1), the applicant is proposing deviations for building heights and floor-area ratios. These zoning deviations would not result in secondary environmental impacts because they would allow the campus to construct new facilities consistent with the bulk and scale of the existing campus buildings, as described in Section 5.8, *Visual Effects/Neighborhood Character*.

The existing CUP/RPO Permit 92-0568 was approved by the City in October 1996. The amended CUP under the Master Plan Update would enable the campus to continue to operate as an institutional use within the underlying residential, commercial, and open space zones, in accordance with Section 126.0301 of the LDC. As noted above, the purpose of the CUP is to allow the City to view uses on a case-by-case basis that are desirable but are not permitted by right in the applicable zone. The campus has operated under a CUP from the City since 1960. With regard to the ESL Regulations, a SDP would be concurrently processed with the CUP for Project impacts to 0.5 acre of sensitive biological resources and 0.3 acre of steep slopes. No impacts to wetlands would occur under the Master Plan Update. Specific findings are required for the City to issue a SDP for impacts to ESL resources. Such findings address the Project's ability to demonstrate the site is suitable for the Project: that development has minimized its disturbance to ESL; that the Project would comply with the MSCP; and that it would not affect impacts to adjacent ESL. In all cases, the Project would be able to make the SDP findings, thus, it would be consistent with the ESL Regulations.

Implementation of the historic resources guidelines in the Master Plan Update combined with the mitigation contained in Section 5.4, *Historical Resources*, would ensure the Project is consistent with Secretary of Interior Standards for Historic Properties and the Historic Resources Regulations in the LDC related to the Built Environment.

The western edge of the campus lies partly within the CPIOZ Type A. The only construction project in that portion of campus is Project Site No. 18, a parking structure with administrative/support uses. The project is proposed on a surface parking lot west of the existing West Campus Parking Structure. Implementation of the project would be consistent with the development regulations contained in the Project Design Guidelines, which in turn implement the policies and recommendations of the Linda Vista Community Plan (refer to Table 5.1-1).

The campus also lies within the Parking Impact Overlay Zone, which requires the campus to identify areas of high parking demand and increase off-street parking to match that demand. The Master Plan Update identifies locations where future parking expansions would occur as student enrollment increases, consistent with the LDC. Refer to the Transportation Impact Analysis contained in Appendix C for a detailed parking analysis.

Consistency with Regional Air Quality Strategy

The Master Plan Update would implement the existing and planned land uses on the campus. Although the SDAB is in non-attainment with the federal standard for ozone and the state standard for ozone and particulate matter, emissions associated with both Project construction and operation would be below the APCD significance criteria, as demonstrated in calculations completed for the Project contained in Appendix F. Further, emissions associated with the Project are contemplated in the long-term plans for the region, and would not be considered cumulatively considerable. The Project would also not affect the SDAB's ability to attain and maintain ambient air quality standards. Refer to the *Air Quality* discussion in Section 5.5.

Consistency with Water Quality Control Plan for the San Diego Basin

The projects outlined in the Master Plan Update would comply with all applicable City and related water quality standards and Hydromodification Management requirements when grading/building permits are sought. Conformance would be demonstrated through the use of appropriate low impact development (LID), source control, priority project, and treatment control best management practices (BMPs) for development. Refer to the *Hydrology/Water Quality* discussion in Section 5.6.

Compatibility with Existing Land Uses

The Master Plan Update and amended CUP would allow for the continued use of the USD property for campus development and related activities. It would not adversely impact any existing land uses or open space (i.e., Tecolote Canyon or MHPA) as most of the new construction would be infill on the mesa of the campus away from the edges of campus or incorporate the planning and design standards outlined in the Master Plan Update. The exceptions would be redevelopment of existing administrative and student housing sites adjacent to Tecolote Canyon and construction of the student housing/parking structure adjacent to Linda Vista Drive. See the analysis below under Issue 3 for a discussion of the Project's consistency with the MSCP Subarea Plan policies.

Significance of Impact

Implementation of the Master Plan Update would comply with the relevant policies of the General and Community Plans, as well as other applicable plans as outlined in Table 5.1-1. The Project would be a continuation of existing uses and activities at the University and would allow the campus to provide the facilities needed to expand its student population in a manner that would minimize off-campus effects and impacts to the environment. The Project would be consistent with the ESL regulations and Historic Resources regulations, among other sections of the LDC. As described above, the zoning deviations requested for the Project would not result in secondary environmental impacts as they would allow the campus to construct new facilities that are consistent with the bulk and scale of the existing campus buildings. The Master Plan Update would not be inconsistent or conflict with the environmental goals and/or objectives of a community or general plan, including

the adopted land use designation or intensity. Overall, the Master Plan Update would be compatible with adopted plans (or policies thereof). No significant land use policy impacts would occur under the Project.

Mitigation, Monitoring and Reporting

No significant land use policy impacts are identified; no mitigation is required.

5.1.3 Impact

Issue 3: Would the proposal conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), land use policy impacts may be significant if the Project would be:

- Inconsistent or conflict with adopted environmental plans for an area.

Impact Analysis

Previously Disclosed Land Use Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR concluded that the USD Master Plan would conflict with the RPO because the encroachment into biological resources would exceed the ordinance's allowances and significant impacts were identified. Analysis of the project's consistency with the MSCP Subarea Plan was not conducted in the previous FEIR because it was not adopted until after the USD Master Plan was approved.

Impacts from the Master Plan Update

The following discussion focuses on the potential inconsistencies with current environmental plans and policies that are applicable to the revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts. Approximately 7.6 acres of the northern portion of the USD campus occur within the MHPA (as shown in Figure 5.1-1 and Tecolote Canyon occurs within the off-site MHPA). The on-campus MHPA encompasses both native habitats, such as southern mixed chaparral, Diegan coastal sage scrub, non-native grassland and southern willow scrub-disturbed. The Project's consistency with the environmental policies protecting resources within the MHPA and Tecolote Canyon, specifically, is provided below.

Consistency with MSCP Subarea Plan

As part of the Master Plan Update process, areas designated within the MHPA were reviewed for their applicability to conservation of environmentally sensitive lands. It was determined that some MHPA mapped as part of the MSCP process include areas containing existing campus development (i.e., buildings, streets). Therefore, an evaluation of the areas of existing developed land was

conducted to determine if they should be removed from the MHPA. Aerial photographs and permits were reviewed to assess the developed areas' status as of the adoption of the MSCP Subarea Plan in 1997. Because the assessment determined that these areas were developed prior to adoption of the MSCP Subarea Plan in accordance with CUP/RPO Permit 92-0568, the Master Plan Update is proposing to shift out these areas from the MHPA as part of a Boundary Line Correction. The proposed MHPA Boundary Line Correction was considered in coordination with the State and Federal Wildlife Agencies and is consistent with the goals of the MSCP to conserve biological resources and allow for existing and future development in appropriate areas. The evaluation process considered the following factors:

- The proposed area to be corrected out was legally permitted (i.e., CUP/RPO Permit 92-0568);
- No habitat, including wetlands, would be removed;
- No buffer area (e.g., wetland buffer or wildlife corridor) would be impacted; and
- Removing the area from the MHPA would not avert the University from having to otherwise comply with the City's MSCP Land Use Adjacency Guidelines.

Based on that evaluation, it was determined that the on-site MHPA contains 0.61 acre of developed land that has been part of the University and permitted for development under the existing CUP/RPO Permit issued in 1996. As shown in Figure 5.3-2, the corrections would remove the 0.61 acre of developed land and would not conflict with the conservation goals of the MSCP Subarea Plan. The area being shifted out of the MHPA was developed at the time the 1996 Master Plan and FEIR were adopted and prior to the approvals of the MSCP Subarea Plan and Implementing Agreement (City 1997). No physical improvements to the campus or loss of resources would occur as part of the Boundary Line Correction. A detailed discussion of the Boundary Line Correction is provided in Section 5.3, *Biological Resources*. Thus, implementation of the Project would not result in any significant direct impacts to the City's preserve and open space system; potentially significant indirect effects to the resources within the MHPA would be avoided through the project's compliance with the Land Use Adjacency Guidelines of the Subarea Plan, as described below.

The Master Plan Update would not directly impact the MHPA and would conform to the MHPA Land Use Adjacency Guidelines to protect the MHPA either through Project design or compliance with the Land Use Adjacency Guidelines discussed below.

The Master Plan Update would also conform to Area Specific Management Directives for MSCP Covered Species likely to occur in the area (such as coastal California gnatcatcher, Cooper's hawk, California cactus wren, and Belding's orange-throated whiptail). Conformance to the guidelines and directives is addressed in Section 6.4.1, *MSCP Consistency*, of the Biological Technical Report (Appendix D). The Master Plan Update would, therefore, not conflict with the provisions of the City's MSCP Subarea Plan.

Land Use Adjacency Guidelines. With regard to the Land Use Adjacency Guidelines described in Section 1.4.3 of the MSCP Subarea Plan, potential indirect impacts to the MHPA generally refer to effects of a project or direct effects that occur outside the proposed area of disturbance. Those impacts may include adverse effects from drainage and toxics, lighting, public access, invasive plant

species, brush management, noise, and grading/land development (as addressed by the policies contained within the City's Land Use Adjacency Guidelines in the MSCP Subarea Plan). They may also include impacts to nesting birds in the MHPA. The following is a description of how the project would comply with the Land Use Adjacency Guidelines (refer to Appendix B for additional details) due to its proximity to the MHPA.

- A. **Grading/Land Development**– Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Project Compliance. Construction activities adjacent to the MHPA have the potential to impact protected resources, particularly when slopes are created (e.g., grading exceeds authorized limits). Due to the proximity of the MHPA to several of the project sites identified in the Master Plan Update, there is potential for impacts to sensitive natural communities within the MHPA. However, all direct impacts related to project development would occur outside the MHPA. No manufactured slopes would occur within the MHPA in compliance with the above guideline.

- B. **Drainage** – All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g. clay compounds) when necessary and appropriate. .

Project Compliance. Design elements for projects under the Master Plan Update that would drain into the MHPA would capture, treat, and store storm water runoff per current storm water regulations as described in Section 5.6, *Hydrology/Water Quality*, before it enters the MHPA. Therefore, the Project would comply with this guideline for the projects adjacent to, or that may affect, the natural environment or ecosystem processes within the MHPA.

- C. **Toxics/Project Staging Areas/Equipment Storage** – Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly-owned property as leases come up for renewal

Project Compliance. The release and spread of toxins, chemicals, petroleum products, and other elements can degrade or harm the natural environment or ecosystems processes. Based on the biological resources analysis in Section 5.3, all potential drainage and toxics impacts would be minimized through the required use of the City's Construction Site BMPs (SDMC Section 43.0301) and by Project design features outlined in the Master Plan Update that would capture, treat, and

store storm water runoff before entering undeveloped or transitional areas consistent with the existing drainage conditions and per current storm water regulations.

- D. **Lighting** – Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Project Compliance. Night lighting exposes wildlife to an unnatural light regime that may adversely affect foraging patterns, increase predation risk, cause biological clock disruptions, and result in a loss of species diversity. Potential night lighting impacts would be minimized by adherence to the City's Outdoor Lighting Regulations (SDMC Section 142.0740), consistent with this guideline.

- E. **Barriers** –New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.

Project Compliance. Public access to natural areas can result in impacts such as trails being created and trash being dumped, which can significantly impact special status species and sensitive natural communities resulting in a land use conflict within an area adjacent to the MHPA. In the northeastern portion of the campus, there are existing trails recognized in the Tecolote Canyon NRMP that connect USD to the MHPA in Tecolote Canyon where the topography is not too steep. The remainder of the campus interface with MHPA and Tecolote Canyon consists of steep slopes that are thickly vegetated primarily with southern mixed chaparral, and which, thus far, have prevented the creation of other trails into the MHPA and down into Tecolote Canyon. No trails are proposed in the MHPA as part of the Project. Therefore, the Master Plan Update would not promote indirect, edge effect impacts to the MHPA from public access. The Design Guidelines of the Master Plan Update includes a provision for perimeter fencing along Tecolote Canyon to be designed and located in coordination with the City Park and Recreation and Landscape departments. The installation of such fencing would further ensure that campus edge effects from increased public access would be minimized consistent with this guideline.

- F. **Invasives** – No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

Project Compliance. Invasive, non-native plants can displace native plants; reduce species diversity; increase flammability and fire frequency; change ground and surface water levels; and adversely affect native wildlife dependent on the native flora. Invasive, non-native plants can colonize areas disturbed by construction and potentially spread into adjacent natural communities (i.e., ESL) and the MHPA. Invasive, non-native plants can also spread from landscaping into adjacent natural communities and the MHPA. The Master Plan Update would follow the SDMC Landscape Standards and comply with the proposed Design Guidelines for planting disturbed and undeveloped areas adjacent to native areas with compatible San Diego County native or climate adapted plant species that are not on the California Invasive Plant Council's list of invasive species. Additionally, existing invasive plant species would be removed

as part of the Master Plan Update on a project-by project basis as required by SDMC (Chapter 14, Article 2, Division 4).

- G. **Brush Management** – New development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 may be located within the MHPA provided the Zone 2 management will be the responsibility of an HOA or other private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size than currently required by the City's regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Project Compliance. The campus would be required to implement brush management where new construction would interface with undeveloped open space in the MHPA. Development adjacent to the MHPA would be set back to provide required Brush Management Zone 1 on the building pad outside of the MHPA. A typical Brush Management program consists of a Zone 1 of 35-feet and Zone 2 of 65-feet. Where a full Brush Management Zone 1 of 35-feet cannot be achieved, Brush Management Zone 2 shall be expanded per the provisions of 142.0412(h)(7). Per the Land Development Manual – Biology Guidelines, a Brush Management Zone 2 which extends into the MHPA is considered "impact neutral" and is not considered part of the proposed developed area.

USD would implement a modified Brush Management program and alternative compliance measures for Project Sites No. 20 and 27, to avoid direct impacts of Zone 1 to the resources within the MHPA, and to avoid brush management activity outside of the CUP Boundary pursuant to Land Development Code (LDC) Section 142.0412(c)(2). Alternative compliance measures would include a hardening of the structure and upgraded opening protection of dual glazed/dual tempered windows, in addition to California Building Code Section 7A requirements. The City's Landscape and Fire Review staff have reviewed the Project's modified brush management plan for compliance with the City's Landscape Regulations. Compliance with the standards through the Project elements described herein would preclude any impacts to biological resources within the MHPA related to human health and public safety.

- H. **Noise:** Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization in the MHPA. Excessively noise uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.

Project Compliance. Construction-related noise from such sources as clearing, grading, and construction vehicular traffic would be a temporary impact to wildlife from implementation of the Master Plan Update should it occur during the breeding season. These noise-related impacts would be considered potentially significant, however, if species sensitive to noise are present, such as the coastal California gnatcatcher in the MHPA. Framework Management Plan. The

MSCP Subarea Plan also addresses the management of the MHPA throughout the City in Section 1.5, *Framework Management Plan*. The overarching MSCP goal is to maintain and enhance the biological diversity of the region and conserve viable populations of sensitive species and their habitats. Where land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to ensure that the biological values are maintained over time. The Master Plan Update does not propose any habitat removal or mitigation within the MHPA; however, the portion of the campus within the MHPA (as corrected by the Boundary Line Correction) would be placed in a Covenant of Easement for its long-term protection in perpetuity.

The University would retain fee title to the property and would be required to assume management responsibility for the on-site MHPA, in accordance with the General and Specific Directives in the Subarea Plan. No additional trails or increased public access are proposed as part of the Project. Consistent with the trail management elements of the Framework Management Plan, the campus would install benches, educational kiosk/signage and trash collection receptacles near the existing trailheads to facilitate open space management. Compliance with the Land Use Adjacency Guidelines and the Natural Resource Management Plan for Tecolote Canyon Natural Park would further ensure the integrity of the on-site MHPA is maintained, in accordance with the Urban Canyons component of the Framework Management Plan. Should any research be completed in the MHPA by USD faculty, the campus would coordinate with the City Park and Recreation Department as required in the MSCP Subarea Plan.

Consistency with Tecolote Canyon Natural Park Natural Resources Management Plan

The Master Plan Update would not grade or develop area within the Park and does not propose any improvements (i.e., trails or utilities) within the Park. As noted above under the Land Use Adjacency Guidelines discussion, the Project would not result in adverse edge effects related to drainage and toxics, lighting, public access, invasive plant species, fugitive dust; potential indirect impacts from construction noise, brush management and grading/land development could occur along the Park interface with the campus due to the campus' compliance with the standard MHPA Land Use Adjacency Guidelines. The Design Guidelines of the Master Plan Update include a provision for perimeter fencing along Tecolote Canyon to be designed and located in coordination with the City Park and Recreation and Landscape departments consistent with the park maintenance guidelines in the NRMP. The campus would also include a trail kiosk, signage and benches to the existing trail heads on campus that lead into Tecolote Canyon to educate students on the natural history, flora and fauna and the sensitivity of the resources in the canyon (refer to Appendix B).

Significance of Impact

No direct impacts to the MHPA would occur and the Boundary Line Correction would remove developed land from the preserve. Project compliance with the Land Use Adjacency Guidelines through conditions of approval would avoid potential impacts to the resources in the MHPA related to grading/land development, drainage and toxics, lighting, public access, barriers, invasive species, brush management, and noise. Management of the MHPA on campus in accordance with the Framework Management Plan of the MSCP Subarea Plan would also be conducted by the University. Therefore, the Project would comply with policies protecting environmental resources in the MHPA as outlined in the MSCP Subarea Plan. The Project would also comply with the maintenance, usage,

and development guidelines of the Tecolote Canyon Natural Park NRMP. No significant land use policy impacts would occur.

Mitigation, Monitoring and Reporting

No significant impacts are identified; no mitigation is required.

5.1.4 Impact

Issue 4: Would the proposal result in the exposure of people to current or future noise levels which exceed the City's Noise Ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), land use policy impacts related to noise may be significant if the Project would result in:

- Incompatible uses as defined in Table NE-3 in the Noise Element of the General Plan.

Impact Analysis

A land use-noise compatibility analysis was conducted in the Project's Acoustical Analysis by HELIX (2016) to address consistency with the noise limits expressed in the Noise Element of the General Plan. Sources included transportation noise from local roads, including Linda Vista Road. As summarized in Section 7.1.6, *Noise* and detailed in Appendix M, none of the project sites under the Master Plan Update would be exposed to noise levels that exceed applicable City General Plan Noise Element standards. In addition, the Project would not cause noise sensitive land uses (NSLUs) to be exposed to noise levels that would exceed the City's 65 dBA (A-weighted decibel) standard.

With regard to airport noise produced by SDIA and Montgomery Field operations, the Master Plan Update construction projects are proposed beyond the 60 dBA Community Noise Equivalent Level (CNEL) noise contour associated with aircraft operations outlined in their respective ACLUPs (SDCRAA 2010, 2014).

Significance of Impact

The Master Plan Update would be consistent with the noise limits expressed in the Noise Element of the General Plan, and located outside of the 60 dBA CNEL noise contour associated with SDIA and Montgomery Field. No significant land use compatibility impacts related to noise would occur.

Mitigation, Monitoring and Reporting

No significant impacts are identified; no mitigation is required.

5.1.5 Impact

Issue 5: Would the proposal result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

Impact Thresholds

According to the City's Significance Determination Thresholds, the Project would result in a significant land use policy impact if it would:

- Result in incompatible uses as defined in an airport land use plan.

Impact Analysis

The campus is not located in any of the safety zones for the SDIA and Montgomery Field. The campus is in Review Area 2 of the AIA; thus, overflight disclosure requirements and project reviews would be conducted in accordance with the policies in the adopted ALUCPs for both facilities and SDMC.

Significance of Impact

The Master Plan Update would not cause any new campus uses to be incompatible with the ALUCPs associated with SDIA and Montgomery Fields because it would not be incompatible with the uses defined in those plans. No land use impacts would occur.

Mitigation, Monitoring and Reporting

No significant impacts are identified; no mitigation is required.

Table 5.1-1 CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN		
Land Use and Community Planning Element		
<p>Airport Land Use Compatibility Goals: Protect the health, safety, and welfare of persons within an airport influence area by minimizing the public's exposure to high levels of noise and risk of aircraft accidents; and protection of public use airports and military air installations from the encroachment of incompatible land uses within an airport influence area that could unduly constrain airport operations.</p> <p><i>LU-G.3.</i> Submit development projects affected by an airport influence area to the ALUC after the adoption or amendment to an Airport Land Use Compatibility Plan to ensure that they are consistent up until the time that the ALUC has determined the General Plan, community plans, and specific plans consistent with the Airport Land Use Compatibility Plan or have the City Council take steps to overrule the ALUC.</p>	<p>The Project site is located within Review Area 2 for SDIA and Montgomery Field (SDCRAA 2010; 2014). Consistent with Policy LU-G.3, the City would coordinate with the ALUC, as required.</p>	<p>Yes</p>
Mobility Element		
<p>Goals: A safe and comfortable pedestrian environment; a complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities; and an interconnected street system that provides multiple linkages within and between communities and vehicle congestion relief.</p>		

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Mobility Element (cont.)		
<p><u>Safety and Accessibility Policies</u></p> <p><i>ME-A.1.</i> Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1.</p> <p><i>ME-A.2.</i> Design and implement safe pedestrian routes.</p> <p><i>ME-A.4.</i> Make sidewalks and street crossings accessible to pedestrians of all abilities.</p> <p><i>ME-A.5.</i> Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.</p> <p><i>ME-A.6.</i> Work toward achieving a complete, functional, and interconnected pedestrian network.</p> <p>a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian-oriented and street lighting, ramps, stairways, and other facilities are implemented as needed to support pedestrian circulation. Additional examples of pedestrian facilities are provided in the Pedestrian Improvements Toolbox, Table ME-1.</p>	<p>The Design Guidelines in the Master Plan Update address vehicular and pedestrian circulation. Ease and efficiency of movement, as well as safety would be key components of any improvements to campus circulation. General improvements in linkages are planned, as well as specific proposals such as Project 19, which would consist of a new pedestrian bridge with access elevators over Marian Way. Several of the off-site improvements described in Section 3.0, <i>Project Description</i>, also would involve sidewalk and curb improvements. All of the planned improvements would be consistent with safety and accessibility Policies ME-A.1, ME-A2, and ME-A.4 through ME-A.6.</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Mobility Element (cont.)		
<p>b. Link sidewalks, pedestrian paths, and multi-purpose trails into a continuous region-wide network where possible (see also Recreation Element, Policy RE-C.6).</p> <p>e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.</p>		
<p><u>Walkability</u></p> <p><i>ME-A.7.</i> Improve walkability through the pedestrian- oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired.</p> <p>a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1 (see also Urban Design Element, Policy UD-A.10).</p> <p>b. Design site plans and structures with pedestrian-oriented features (see also Urban Design, Policies UD-A.6, UD-B.4, and UD-C.6).</p>	<p>The Master Plan Update contains pedestrian circulation guidelines which would include dedicated pedestrian-only walkways, axial paths connecting key destinations and sidewalks bordering roadways. Special paving, striping and/or raised speed tables would be used where pedestrians cross roadways. Trees, benches, and plazas would be expanded to foster walkability and higher levels of pedestrian activity on campus. All of the planned circulation improvements would be consistent with Policy ME-A.7.</p>	Yes
<p><u>Transit Supportive City Land Use Planning</u></p> <p><i>ME-B.9.</i> Make transit planning an integral component of long-range planning documents and the development review process.</p>	<p>Campus development under the Master Plan Update would support and reinforce a multi-modal circulation system that directs vehicles to the perimeter of campus, utilizes shuttles on the loop road, and emphasizes pedestrian access at the campus core, consistent with Policy ME-B.9.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Mobility Element (cont.)		
<u>Project Review Considerations</u> ME-C.8. Implement Traffic Impact Study Guidelines that address site and community specific issues	A Transportation Impact Analysis (TIA) was prepared to evaluate the Project's impacts on transportation systems in the Project area and community at large. Consistent with Policy ME-C.8, the TIA was prepared in accordance with the City guidelines. The Project design accommodates pedestrians as well as bicycles to provide alternative transportation options for accessing the campus.	Yes
Transportation Demand Management Goal: Expanded travel options and improved personal mobility. ME-E.1. Support TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework. ME-E.3. Emphasize the movement of people rather than vehicles. ME-E.4. Promote the most efficient use of the City's existing transportation network.	An integrated multi-modal transportation system is envisioned for the USD campus that encourages walking, biking, and transit use. The campus would continue to rely on its shuttle system to connect to the Old Town Transit Station, as well as to provide service to on-campus users. The Morena/Linda Vista Trolley Station currently connects the campus to downtown San Diego via the green line trolley service. Planned extension of the trolley line through the Morena area to the UTC/UCSD area would further improve alternative transportation options. All of these conditions are consistent with Policies ME-E.1, ME-E.3, and ME-E.4.	Yes
ME-E.6. Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate.	Consistent with Policies ME-E.6 and ME-E.7, the Project contains design features that would make it a walkable community wherein users would be able to park once and move around the campus.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Mobility Element (cont.)		
<p><i>ME-E.7.</i> Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.</p>	A number of TDM measures are identified in the Project's Transportation Impact Analysis (LLG 2016) which would reduce vehicle and parking needs for campus users (refer to Appendix C).	Yes
<p>Bicycling Goals: A city where bicycling is a viable travel choice, particularly for trips of less than five miles; a safe and comprehensive local and regional bikeway network; and environmental quality, public health, recreation and mobility benefits through increased bicycling.</p> <p><i>ME-F.3.</i> Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.</p>	Under the Master Plan Update, the on-campus bicycle network would be expanded. Bicycle parking would be provided in parking hubs at the edge of campus near the loop road. Bike lanes and "sharrows" could be integrated along the campus loop road. The campus would also consider establishing a bike share program to increase bike accessibility. All of these proposals are consistent with Policy ME-F.3.	Yes
<p>Parking Management Goals: Parking that is reasonably available when and where it is needed through management of the supply; solutions to community-specific parking issues through implementation of a broad range of parking management tools and strategies; new development with adequate parking through the application of innovative citywide parking regulations; and increased land use efficiencies in the provision of parking.</p> <p><i>ME-G.1.</i> Provide and manage parking so that it is reasonably available when and where it is needed.</p>	Consistent with Policy ME-G.1, structured parking would be integrated into new buildings or expanded in the West campus area. Limited surface parking would also be provided. All parking would be expanded commensurate with needs as student enrollment increases over time, consistent with Policy ME-G.1.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Mobility Element (cont.)		
<p><i>ME-G.5.</i> Implement parking strategies that are designed to help reduce the number and length of automobile trips. Reduced automobile trips would lessen traffic and air quality impacts, including greenhouse gas emissions (see also Conservation Element, Section A). Potential strategies include, but are not limited to those described on Table ME-3.</p>	<p>Existing and new parking areas would be linked to campus uses through the shuttle/tram service so as to limit the need to relocate or repark, consistent with parking strategies referenced in Policy ME-G.5.</p>	Yes
Urban Design Element		
<p>General Urban Design Goals: A built environment that respects San Diego's natural environment and climate; an improved quality of life through safe and secure neighborhoods and public places; a pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects desirable community character and context; and a City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.</p> <p><u>Natural Features</u> UD-A.1. Preserve and protect natural landforms and features.</p>	<p>The Master Plan Update proposes new structures throughout campus, the majority of which would occur within the developed areas. Grading guidelines are contained in the Master Plan to ensure sensitivity with regard to natural landforms. Only one project site (i.e., Project Site No. 22) would grade natural landforms, in particular steep slopes, as described in Section 5.8, <i>Visual Effects/Neighborhood Character</i>. Approval of the proposed Master Plan Update would place the rest of the natural landforms into an easement to preserve their features consistent with Policy UD-A.1.</p>	Yes
<p><u>Development Adjacent to Natural Features and Park Lands Policy</u> UD-A.3. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.</p>	<p>The Design Guidelines in the Master Plan Update contain grading guidelines to facilitate sensitive grading techniques throughout the campus and adjacent to natural features (such as Tecolote Canyon). The campus would minimize landform alteration by</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<p>a. Integrate development on hillside parcels with the natural environment to preserve and enhance views, and protect areas of unique topography.</p> <p>b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain.</p> <p>f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized.</p> <p>g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.</p> <p>h. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas.</p>	<p>designing buildings to step down the slope, working with the terrain and topography; manufactured slopes would be contoured to a natural appearance to avoid obvious hillside cuts and revegetated to blend with existing vegetation; and the use of retaining walls would be minimized. Natural, earth coloring as close as possible to natural conditions would be used. The campus would also minimize grading on the northern property line adjacent to Tecolote Canyon and integrate increased setbacks, where possible. Landscaping would be used to visually soften hard edges, such as walls or parking structures. Brush management would be conducted in accordance with City fire protection requirements. All construction projects would be designed in accordance with these Master Plan Update guidelines and would be consistent with Policy UD-A.3.</p>	

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<ul style="list-style-type: none"> i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy. j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way. k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features. l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. n. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas. o. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that respects open space resources. This could include the use of alternative materials such as “quiet pavement” in noise sensitive locations, and bridge or roadway designs that respect the natural environment. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.		
<u><i>Sustainable Development Policies</i></u> UD-A.4. Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.	The Design Guidelines contain sustainability features consistent with Policy UD-A.4.	Yes
<u><i>Architecture Policies</i></u> UD-A.5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context. a. Relate architecture to San Diego's unique climate and topography. b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials in proximity to commercial areas and residential neighborhoods that have a well-established, distinctive character.	In accordance with the Design Guidelines in the Master Plan Update, design features for new structures and campus improvements would embrace the mild climate, relate to the scale of existing structures, and reflect the existing 16 th Century Spanish Renaissance architectural style of the USD campus. Specifically, the Design Guidelines address various architectural elements, such as building orientation and faced treatment; roofs, ground floors and indoor/outdoor spaces, building bases, building heights, arcades and other features; and landscape design as it affects architectural elements. The Project would be consistent with Policy UD-A.5.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<ul style="list-style-type: none"> c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character. d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence. e. Provide architectural interest to discourage the appearance of blank walls for development. This would include not only building walls, but fencing bordering the pedestrian network, where some form of architectural variation should be provided to add interest to the streetscape and enhance the pedestrian experience. For example, walls could protrude, recess, or change in color, height, or texture to provide visual interest. f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs, and recessed doorways are used to provide visual interest at the pedestrian level. g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street. h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
i. Maximize natural ventilation, sunlight, and views. j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances. k. Design roofs to be visually appealing when visible from public vantage points and public rights-of-way.		
<i>UD-A.6.</i> Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience. a. Locate buildings on the site so that they reinforce street frontages. b. Relate buildings to existing and planned adjacent uses. c. Ensure that building entries are prominent, visible, and well-located. d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern. e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.	The Design Guidelines of the Master Plan Update address streetscape areas in terms of setbacks and landscaping. Most of the project sites proposed in the Master Plan Update would have frontages along the campus loop road or central paseo and not with public streets. The exception would be Project Site No. 23 which would be situated along Linda Vista Road. The Design Guidelines contain Focus Area recommendations for this portion of campus which take into account the building's relationship with the street, stormwater management, shade over pavement, and reduction of heat island effect (refer to Focus Area K in Appendix B to this report), consistent with Policy UD-A.6.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<p><u>Landscape Policies</u></p> <p>UD-A.8: Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.</p> <ol style="list-style-type: none"> Maximize the planting of new trees, street trees and other plants for their shading, air quality, and livability benefits (see also Conservation Element, Policies CE-A.11, CE-A.12, and Section J). Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available. Use landscape to support storm water management goals for filtration, percolation, and erosion control. Use landscape to provide unique identities within neighborhoods, villages and other developed areas. Landscape materials and design should complement and build upon the existing character of the neighborhood. Design landscape bordering the pedestrian network with new elements, such as a new plant form or material, at a scale and intervals appropriate to the site. This is not intended to discourage a uniform street tree or landscape theme, but to add interest to the streetscape and enhance the pedestrian experience. 	<p>Consistent with UD-A.8, Project landscaping would implement the Landscape Master Plan and Design Standards in the Master Plan Update. All construction projects would be developed according to the Landscape Regulations and Landscape Standards of the LDC which incorporate requirements for water conservation.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<p>g. Establish or maintain tree-lined residential and commercial streets. Neighborhoods and commercial corridors in the City that contain tree-lined streets present a streetscape that creates a distinctive character.</p> <ol style="list-style-type: none"> 1. Identify and plant trees that complement and expand on the surrounding street tree fabric. 2. Unify communities by using street trees to link residential areas. 3. Locate street trees in a manner that does not obstruct ground illumination from streetlights. <p>h. Shade paved areas, especially parking lots.</p> <p>i. Demarcate public, semi-public/private, and private spaces clearly through the use of landscape, walls, fences, gates, pavement treatment, signs, and other methods to denote boundaries and/or buffers.</p> <p>j. Use landscaped walkways to direct people to proper entrances and away from private areas.</p> <p>k. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.</p> <p>l. Utilize landscape adjacent to natural features to soften the visual appearance of a development and provide a natural buffer between the development and open space areas.</p>		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<u>Street Design Policies</u> UD-A.10: Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).	Where the campus interfaces with the public streetscape and projects are proposed (i.e., Project Site No. 23 or off-site improvements outlined in Section 3.0, <i>Project Description</i>), walkability and transit would be integrated into the design, as required by the City LDC, consistent with Policy UD-A.10.	Yes
<u>Structured Parking Policies</u> UD-A.11. Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking (see also Mobility Element, Section G). a. Design safe, functional, and aesthetically pleasing parking structures. b. Design structures to be of a height and mass that are compatible with the surrounding area. c. Use building materials, detailing, and landscape that complement the surrounding neighborhood. d. Provide well-defined, dedicated pedestrian entrances. e. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent buildings.	Parking structures would be used to devote more land to campus uses. The structures would be integrated behind or beneath proposed buildings and would implement the design features outlined in the Design Guidelines. As such, the parking structure design would embrace the design concepts outlined in Policy UD-A.11.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<p>f. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. Where ground floor commercial is proposed, provide a tall, largely transparent ground floor along pedestrian active streets.</p> <p>g. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security.</p>		
<p><u>Surface Parking Policies</u></p> <p>UD-A.12. Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).</p> <p>a. Encourage placement of parking along the rear and sides of street-oriented buildings.</p> <p>b. Avoid blank walls facing onto parking lots by promoting treatments that use colors, materials, landscape, selective openings, or other means of creating interest. For example, the building should protrude, recess, or change in color, height, or texture to reduce blank facades.</p> <p>c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations.</p> <p>d. Locate pedestrian pathways in areas where vehicular access is limited.</p>	<p>The emphasis in the Master Plan Update would be to expand and replace parking in structures and complement them with small lots interspersed through the campus periphery. The lots would implement the design controls outlined in the Design Guidelines of the Master Plan which take into consideration pedestrian linkages, signage, wall placement, landscaping, and other elements, consistent with Policy UD-A.12.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<ul style="list-style-type: none"> e. Avoid large areas of uninterrupted parking especially adjacent to community public view sheds. f. Build multiple small parking lots in lieu of one large lot. g. Retrofit existing expansive parking lots with street trees, landscape, pedestrian paths, and new building placement. h. Promote the use of pervious surface materials to reduce runoff and infiltrate storm water. i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots (see also Conservation Element, Policy CE-A.12). 		
<p><u>Lighting Policies</u></p> <p>UD-A.13. Provide lighting from a variety of sources at appropriate intensities and qualities for safety.</p> <ul style="list-style-type: none"> a. Provide pedestrian-scaled lighting for pedestrian circulation and visibility. b. Use effective lighting for vehicular traffic while not overwhelming the quality of pedestrian lighting. c. Use lighting to convey a sense of safety while minimizing glare and contrast d. Use vandal-resistant light fixtures that complement the neighborhood and character. e. Focus lighting to eliminate spill-over so that lighting is directed, and only the intended use is illuminated. 	<p>Lighting would be provided in various settings for safety and aesthetic purposes. Lighting would be provided along internal roadways for vehicular circulation, as well as along pedestrian walkways for transportation-related safety. Additionally, lighting would be provided as a Crime Prevention Through Environmental Design (CPTED) measure to reduce cover for potential criminal activity. Lighting for all of these purposes would be intentionally directed such that the intended area is illuminated but spillover lighting into sensitive areas (e.g., residences) is reduced. These lighting practices outlined in the campus Design Guidelines contained in the Master Plan Update would be in conformance with Policy UD-A.13.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<u>Signs Policies</u> <i>UD-A.14:</i> Design project signage to effectively utilize sign area and complement the character of the structure and setting. <ul style="list-style-type: none"> a. Architecturally integrate signage into project design. b. Include pedestrian-oriented signs to acquaint users to various aspects of a development. Place signs to direct vehicular and pedestrian circulation. c. Post signs to provide directions and rules of conduct where appropriate behavior control d. Design signs to minimize negative visual impacts. e. Address community-specific signage issues in community plans, where needed. 	Consistent with Policy UD-A.14, signs would maintain the high standards for sign design already exhibited on campus, would be consistent with the architectural style of the campus, as reflected in the Design Guidelines in the Master Plan update.	Yes
<u>Utilities Policies</u> <i>UD-A.16.</i> Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm. <ul style="list-style-type: none"> a. Convert overhead utility wires and poles, and overhead structures such as those associated with supplying electric, communication, community antenna television, or similar service to underground. 	All utilities would be installed during construction and undergrounded. Therefore, the Project would result in minimal visual intrusion related to utility systems, consistent with Policy UD-A.16. Visual clutter related to utility systems and traffic control would be avoided through proper siting, screening and integration into structures, to the extent practical. The Project would minimize the visibility of utility systems consistent with Policy US-A.16.	Yes

<p>Table 5.1-1 (cont.)</p> <p>CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<p>b. Design and locate public and private utility infrastructure, such as phone, cable and communications boxes, transformers, meters, fuel ports, back-flow preventers, ventilation grilles, grease interceptors, irrigation valves, and any similar elements, to be integrated into adjacent development and as inconspicuous as possible.</p> <p>To minimize obstructions, elements in the sidewalk and public right of way should be located in below grade vaults or building recesses that do not encroach on the right of way (to the maximum extent permitted by codes). If located in a landscaped setback, they should be as far from the sidewalk as possible, clustered and integrated into the landscape design, and screened from public view with plant and/or fencelike elements.</p> <p>c. Traffic operational features such as streetlights, traffic signals, control boxes, street signs, and similar facilities should be located and consolidated on poles, to minimize clutter, improve safety, and maximize public pedestrian access, especially at intersections and sidewalk ramps. Other street utilities such as storm drains and vaults should be carefully located to afford proper placement of the vertical elements.</p>		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Urban Design Element (cont.)		
<u>Safety and Security Policies</u> UD-A.17: Incorporate Crime Prevention Through Environmental Design measures, as necessary, to reduce incidences of fear and crime, and design safer environments. a. Design projects to encourage visible space and “eyes on the street” security that will serve as a means to discourage and deter crime through the location of physical features, activities, and people to maximize visibility. b. Define clear boundaries between public, semi-public/ private, and private spaces. c. Promote regulations, programs, and practices that result in the proper maintenance of the measures employed for CPTED surveillance, access control, and territoriality. d. Consider pedestrian scale lighting and indirect techniques to provide adequate security but not glare and flood-light conditions.	The Project design includes a variety of uses which would encourage activity in various locations throughout the campus and throughout the day. Lighting would be incorporated into campus improvements in accordance with the Design Guidelines and City Lighting Ordinance. The presence of users during various times of the day would contribute “eyes on the street” to discourage crime. These measures would conform to Policy UD-A.17.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element		
<p>Evaluation of Growth, Facilities, and Services Goals: Adequate public facilities that are available at the time of need and public facilities exactions that mitigate the facilities impacts that are attributable to new development.</p> <p><i>PF-C.1.</i> Require development proposals to fully address impacts to public facilities and services.</p> <ul style="list-style-type: none"> a. Identify the demand for public facilities and services resulting from discretionary projects. b. Identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects. c. Subject projects, as a condition of approval, to exactions that are reasonably related and in rough proportionality to the impacts resulting from the proposed development. d. Provide public facilities and services to assure that current levels of service are maintained or improved by new development within a reasonable time period. 	<p>Adequate public services would be provided in accordance with the Project-specific studies conducted for the Master Plan Update and referenced in this report.</p> <p>As discussed in Section 5.7, <i>Public Utilities</i>, no additional improvements to the public water system on campus are required to implement the Project and improvements to the sewer conveyance system off-campus may need to be installed at the time specific campus development moves forward. Current levels of service would be maintained or improved within a reasonable time period. As such, the Project would be consistent with Policies PF-C.1 and PF-C-2.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p><i>PF-C.6.</i> Maintain public facilities financing plans (PFFP) to guide the provision of public facilities.</p> <p>a. Identify in financing plans all facilities costs and needs required to serve existing and future development.</p> <p>b. Evaluate and amend or update financing plans at developer expense for consistency if needed, when community plans are amended to increase density or intensity according to the following guidelines:</p>		
<p>Fire Goal: Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.</p> <p><i>PF-D.1.</i> Locate, staff, and equip fire stations to meet established response times. Response time objectives are based on national standards. Add one minute for turnout time to all response time objectives on all incidents.</p> <ul style="list-style-type: none"> • Total response time for deployment and arrival of the first-in engine company for fire suppression incidents should be within four minutes 90 percent of the time. • Total response time for deployment and arrival of the full first alarm assignment for fire suppression incidents should be within eight minutes 90 percent of the time. 	<p>Although the Project would increase demands on San Diego Fire-Rescue Department Services (SDFD) and deficiencies have been identified in the Project area, the University would be required by the City to pay development impact fees, as a condition of approval, to address the capital costs of increasing facilities for Fire-Rescue Services, as identified in the Citygate study and Public Facilities Financing Plan (PFFP). Therefore, the Project would be consistent with fire goal policies referenced in PF-D.1, PF-D.2, PF-D.5, and PF-D.6.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<ul style="list-style-type: none"> • Total response time for the deployment and arrival of first responder or higher-level capability at emergency medical incidents should be within four minutes 90 percent of the time. • Total response time for deployment and arrival of a unit with advanced life support capability at emergency medical incidents, where this service is provided by the City, should be within eight minutes 90 percent of the time. <p><i>PF-D.2.</i> Deploy to advance life support emergency responses Emergency Medical Services (EMS) personnel including a minimum of two members trained at the emergency medical technician-paramedic level and two members trained at the emergency medical technician-basic level arriving on scene within the established response time as follows:</p> <ul style="list-style-type: none"> • Total response time for deployment and arrival of EMS first responder with Automatic External Defibrillator should be within four minutes to 90 percent of the incidents; and • Total response time for deployment and arrival of EMS for providing advanced life support should be within eight minutes to 90 percent of the incidents. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p><i>PF-D.5.</i> Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.</p> <p>a. Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or non-emergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities.</p> <p><i>PF-D.6.</i> Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.</p>		
<p>Police Goals: Safe, peaceful, and orderly communities; and police services that respond to community needs, respect individuals, develop partnerships, manage emergencies, and apprehend criminals with the highest quality of service.</p> <p><i>PF-E.1.</i> Provide a sufficient level of police services to all areas of the City by enforcing the law, investigating crimes, and working with the community to prevent crime.</p>	<p>Although the Project would increase demands on San Diego Police Department (SDPD), the City would incrementally augment police services and personnel, as needed, during implementation of the Master Plan Update over the next 20 years to ensure that adequate police response times are achieved. Additionally, a Crime Prevention through Environmental Design (CPTED) review would be conducted when construction projects are submitted for review to address general security concerns on campus. Therefore, the Project would be consistent with police goals referenced in PF-E.1, PF-E.2, and PF-E.7.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p><i>PF-E.2.</i> Maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:</p> <ul style="list-style-type: none"> • Priority E Calls (imminent threat to life) within 7 minutes. • Priority 1 Calls (serious crimes in progress) within 12 minutes. • Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes. • Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes. • Priority 4 Calls (minor requests for police service) within 90 minutes. 		
<p><i>PF-E.7.</i> Maintain service levels to meet demands of continued growth and development, tourism, and other events requiring police services.</p> <p>a. Analyze the need for additional resources and related capital improvements when total annual police force out-of-service time incrementally increases by 125,000 hours over the baseline of 740,000 in a given year. Out-of-service time is defined as the time it takes a police unit to resolve a call for service after it has been dispatched to an officer.</p>		Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p>Wastewater Goals: Environmentally sound collection, treatment, reuse, disposal, and monitoring of wastewater and increased use of reclaimed water to supplement the region's limited water supply.</p> <p><i>PF-F.6.</i> Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.</p>	<p>The Project would tie into the regional wastewater system and would be comply with all applicable City standards concerning wastewater collection. As discussed in Section 5.7, <i>Public Utilities</i>, the existing collection system has capacity to accommodate the Project consistent with Policy PF-F.6.</p>	Yes
<p>Stormwater Infrastructure Goals: Protection of beneficial water resources through pollution prevention and interception efforts; and a storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.</p> <p><i>PF-G.1.</i> Ensure that all storm water conveyance systems, structures, and maintenance practices are consistent with federal Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards.</p> <p><i>PF-G.2.</i> Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.</p>	<p>All storm water conveyance systems, structures and maintenance practices would be consistent with the Clean Water Act and California Regional Water Quality Control Board NPDES Permit standards and all other regulatory mandates to protect water quality. The Project would, therefore, be consistent with Policies PF-G.1, PF-G.2, PF-G.3, and PF-G.5.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p><i>PF-G.3.</i> Meet and preferably exceed regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures.</p> <p><i>PF-G.5.</i> Identify and implement BMPs for projects that repair, replace, extend, or otherwise affect the storm water conveyance system. These projects should also include design considerations for maintenance, inspection, and, as applicable, water quality monitoring.</p>		
<p>Water Infrastructure Goals: A safe, reliable, and cost-effective water supply for San Diego and water supply infrastructure that provides for the efficient and sustainable distribution of water.</p> <p><i>PF-H.3.</i> Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development, maintain adequate service levels, and develop water supply options during emergency situations.</p> <p>a. Plan for a water supply and emergency reserves to meet peak load demand during a natural disaster such as a fire or earthquake.</p>	<p>A Water Supply Assessment (WSA) was prepared for the Project, which is contained in Appendix H, to determine if there is sufficient water supply to serve existing demands, projected demands of the Project, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. The Project WSA also concludes that The Metropolitan Water District (MWD), San Diego County Water Authority (SDCWA), and City Public Utilities Department (PUD) would have adequate water supplies to meet long-term future demands, including those associated with the proposed project; refer to Section 5.7, <i>Public Utilities</i>, for additional details on the water supply analysis. The Project would be consistent with Policy PF-H.3.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p>Waste Management Goals: Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.</p> <p><i>PF-I.2.</i> Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).</p> <p>d. Maximize the separation of recyclable and compostable materials.</p> <p>f. Reduce and recycle Construction and Demolition (C&D) debris. Strive for recycling of 100 percent of inert C&D materials and a minimum of 50 percent by weight of all other material.</p> <p>g. Use recycled, composted, and post-consumer materials in manufacturing, construction, public facilities and in other identified uses whenever appropriate.</p> <p>l. Encourage the private sector to build a mixed construction and demolition waste materials recycling facility.</p>	<p>As a condition of approval, the University would implement the Project's Waste Management Plan (WMP) to reduce waste deposited in landfills. The plan would be consistent with Policies PF-I.2 and PF-I.5. Section 5.7, <i>Public Utilities</i>, contains additional discussion on solid waste management practices at the University and within the City.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p>Public Utilities Goals: Public utilities services provided in the most cost-effective and environmentally sensitive way; and public utilities that sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient, and well-integrated into the natural and urban landscape.</p> <p><i>PF-M.3.</i> Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of long range planning and development process, especially in redevelopment/urban areas where land constraints exist.</p>	<p>Coordination with the City Engineering, PUD and other utility agencies has been conducted as part of the master planning process. Consideration was given to easements and infrastructure in compliance with Policy PF-M.3.</p>	Yes
<p>Seismic Safety Goals: Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions; and development that avoids inappropriate land uses in identified seismic risk areas.</p> <p><i>PF-Q.1.</i> Protect public health and safety through the application of effective seismic, geologic, and structural considerations.</p> <p>a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.</p>	<p>A Geotechnical Investigation was prepared on the site and validated for the Project; there are no geotechnical hazards on the campus, except in the westernmost area where the potential exists for a potentially active fault which would need further study. As discussed in Section 7.1.3, <i>Geologic Conditions</i>, seismic risks would be less than significant considering the Project would implement recommendations in the investigation and comply with CBC and other applicable City building standards. The Project would not conflict with Policy PF-Q.1.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Public Facilities, Services, and Safety Element (cont.)		
<p>c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.</p> <p>g. Adhere to state laws pertaining to seismic and geologic hazards.</p>		
Recreation Element		
<p>Park and Recreation Goals: Provision of parklands that keep pace with population growth through timely acquisition and development.</p> <p><u>Park Standards Policies</u></p> <p><i>RE-A.10.</i> Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini parks to supplement population-based parks. (see also Urban Design Policies, UD-B.8 and UD-C.5)</p> <p><i>RE-C.1.</i> Protect existing parklands and open space from unauthorized encroachment by adjacent development through appropriate enforcement measures.</p>	<p>The campus maintains a variety of recreation facilities and the Master Plan Update would make provisions for the implementation of more facilities to be provided in conjunction with campus growth, consistent with Policy RE-A.10. The campus would continue to provide access into Tecolote Canyon open space from its property; the Project would be consistent with Policy RE-C.1.</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Recreation Element (cont.)		
<p><i>RE-C.2.</i> Protect, manage, and enhance population- and resource-based parks and open space lands through appropriate means which include sensitive planning, park and opens space dedications, and physical protective devices.</p> <p><i>RE-C.7.</i> Protect beaches and canyons from uncontrolled urban runoff.</p>	<p>Consistent with Policy RE-C.2, the Project would be required to convey and easement over campus lands within the MHPA. The MHPA Boundary Line Correction would remove 0.61 acre of developed land from the MHPA as discussed in Section 5.3, <i>Biological Resources</i>.</p> <p>Runoff into local canyons would be controlled through the use of bio-retention basins and other BMPs described in Section 5.6, <i>Hydrology/Water Quality</i>, consistent with Policy RE-C.7.</p>	Yes
<p>Accessibility Goals: Park and recreation facilities that are sited to optimize access by foot, bicycle, public transit, automobile, and alternative modes of travel; and provision of an inter-connected park and open space system that is integrated into and accessible to the community.</p> <p><i>RE-D.6.</i> Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.</p> <p>a. Provide pedestrian and bicycle paths between recreation facilities and residential development.</p> <p>c. Improve public access through development of, and improvements to, multi-use trails within urban canyons and other open space areas.</p> <p>f. Identify key trails and access points as a part of community plan updates, discretionary permit reviews, and other applicable land use and park planning documents.</p>	<p>Existing and proposed trail connections would be maintained, in coordination with the Park and Recreation Department, into Tecolote Canyon. Public access to those trails would continue to be available from the USD campus. The Project would be consistent with Policies RE-D.6 and RE-D.7. Project consistency with the Tecolote Canyon Natural Park Master Plan is discussed below in this table.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Recreation Element (cont.)		
<p><i>RE-D.7.</i> Provide public access to open space for recreational purposes.</p> <p>a. Provide public access into Multiple Species Conservation Program (MSCP) open space for only those recreational purposes deemed compatible with the preservation goals of the MSCP Subarea Plan.</p> <p>b. Provide public access at locations consistent with the goals and policies of the Conservation Element</p>		
<p>Open Space Lands and Resource-Based Parks Goals: An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities and protection of the public health and safety; preservation of the natural terrain and drainage systems of San Diego's open space lands and resource-based parks; and a system of pedestrian, bicycle, and equestrian paths linking communities, neighborhoods, parks and the open space system.</p> <p><i>RE-F.1.</i> Protect and enhance park lands from adjacent incompatible uses and encroachments. (see also Urban Design Element, Policy UD-A.3)</p> <p><i>RE-F.2.</i> Provide for sensitive development of recreation uses within and adjacent to City-owned open space lands.</p>	<p>Project sites in the Master Plan Update would avoid directly affecting sensitive resources in Tecolote Canyon; two project sites involving redevelopment of existing campus facilities (i.e., Project Site Nos. 20 and 27) are proposed adjacent to the Park. No impacts to existing parklands are proposed, consistent with Policies RE-F.1 and RE-F.2.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element		
<p>Climate Change and Sustainable Development Goals: To reduce the City's overall carbon dioxide footprint by promoting energy efficiency, alternative modes of transportation, sustainable planning and design, and waste management; to be prepared for, and able to adapt to adverse climate change impacts; and to become a city that is an international model of sustainable development and conservation.</p> <p>CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.</p> <p>a. Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</p> <ul style="list-style-type: none"> Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology; 	<p>Consistent with Policy CE-A.5, the University would continue and expand its sustainability features and practices as described in Section 3.0, <i>Project Description</i>. Implementation of these measures and compliance with the California Building Code (CBC) would contribute to the City's goals concerning sustainability contained in Policies CE-A.5 and CE-A.7.</p> <p>The Project would implement a WMP which would effectively reduce construction and demolition waste in accordance with the City's Construction and Demolition Recycling Ordinance. With implementation of the waste reduction measures identified in the WMP, the Project would be consistent with Policy CE-A.8.</p> <p>In compliance with the City's Recycling Ordinance, the Project would provide dedicated areas for the collection of refuse and recyclable materials and would ensure a collection service be provided for Project operation. Therefore, the Project would comply with Policy CE-A.10.</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<ul style="list-style-type: none"> Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens; Employing self-generation of energy using renewable technologies; Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods; Reducing levels of non-essential lighting, heating and cooling; and Using energy efficient appliances and lighting. <p>CE-A.8: Encourage sustainable landscape design and maintenance.</p> <p>CE-A.10: Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas:</p> <ol style="list-style-type: none"> Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material. Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection, and storage of paper, glass, plastic, metals, yard waste, and other materials as needed. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p><i>CE-A.11:</i> Implement sustainable landscape design and maintenance.</p> <ul style="list-style-type: none"> a. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers. b. Encourage composting efforts through education, incentives, and other activities. c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas, and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policy RE-A.6 and A.7). d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals. e. Reduce use of lawn types that require high levels of irrigation. f. Strive to incorporate existing mature trees and native vegetation into site designs. g. Minimize the use of landscape equipment powered by fossil fuels. h. Implement water conservation measures in site/building design and landscaping. 	<p>All landscape and irrigation would conform to the standards set forth in the City of San Diego LDC and Landscape Standards Manual and other applicable City and regional standards. Landscaping would include water conservation measures through irrigation management (e.g., use of pressure/moisture sensors and shut-off valves). Additionally, drought-tolerant plant materials would be incorporated into the landscape plan. These measures would ensure compliance with Policy CE-A.11.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>i. Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible (see Policy CE-A.12).</p> <p>CE-A.12. Reduce the San Diego Urban Heat Island, through actions such as:</p> <ul style="list-style-type: none"> • Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up; • Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots; and • Reducing heat build-up in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12). 	<p>The Project includes design features to minimize potential “Urban Heat Island Effects,” including planting trees in parking areas and other measures outlined in the Design Guidelines for the Master Plan Update. Implementation of these campus design features would be in conformance with Policy CE-A.12.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>Open Space and Landform Preservation Goals: Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.</p> <p><i>CE-B.1.</i> Protect and conserve the landforms, canyon lands, and open spaces that define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetland habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.</p> <p><i>CE-B.2.</i> Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains, sensitive biological areas, including wetlands, steep hillsides, canyons, and coastal lands.</p> <p><i>CE-B.4.</i> Limit and control runoff, sedimentation, and erosion both during and after construction activity.</p> <p><i>CE-B.5.</i> Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.</p>	<p>Consistent with Policies CE-B.1 and CE-B.2, the Project design would minimize impacts to steep slopes, which primarily occur along the northern and southern edges of the campus mesa. No significant impacts to public view or vistas would occur, as outlined in Section 5.8, <i>Visual Effects/Neighborhood Character</i>. No direct impacts to resources within the MHPA are proposed; local wildlife corridor along the southern slopes of Tecolote Canyon would be preserved in an easement. Impacts to 0.5 acre of biological sensitive areas and 0.3 acre of steep slopes would be mitigated and a Site Development Permit (SDP) would be issued. The MHPA Boundary Line Correction would remove developed land from the preserve.</p> <p>As suggested in Policy CE-B.4, water quality would be protected during construction and upon operation through the implementation of Best Management Practices (BMPS) designed to comply with the City's stormwater regulations, including its NPDES permit.</p> <p>Trail connections into Tecolote Canyon would be maintained and enhanced, consistent with Policy CE-B.5</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>Water Resources Management Goals: A safe and adequate water supply that effectively meets the demand for the existing and future population through water efficiency and reclamation programs.</p> <p><i>CE-D.5:</i> Integrate water and land use planning into local decision-making, including using water supply and land use studies in the development review process.</p>	<p>The Project would employ strategies to reduce its potable water demand through the installation of drought-tolerant landscaping, irrigation controls, and compliance with the CBC, which includes the incorporation of water-saving fixtures. Implementation of these Project design features would be in conformance with Policy CE-D.5.</p>	Yes
<p>Urban Runoff Management Goals: Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property.</p> <p><i>CE-E.2.</i> Apply water quality protection measures to land development projects early in the process-during project design, permitting, construction, and operations-in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.</p> <p>a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design.</p>	<p>As discussed in Section 5.6, <i>Hydrology/Water Quality</i>, the Project site would comply with existing water quality requirements, including City and NPDES requirements for protection measures, such as best management practices to prevent erosion. Implementation of these measures would be in conformance with Policies CE-E.2, CE-E.3, and CE-E.6.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<ul style="list-style-type: none"> b. Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas. c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible. d. Increase the use of vegetation in drainage design. e. Maintain landscape design standards that minimize the use of pesticides and herbicides. f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies. h. Enforce maintenance requirements in development permit conditions. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p><i>CE-E.3.</i> Require contractors to comply with accepted storm water pollution prevention planning practices for all projects.</p> <ul style="list-style-type: none"> a. Minimize the amount of graded land surface exposed to erosion and enforce erosion control ordinances. b. Continue routine inspection practices to check for proper erosion control methods and housekeeping practices during construction. 		
<p><i>CE-E.6.</i> Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.</p> <ul style="list-style-type: none"> a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations. b. Review plans for new development and redevelopment for connections to the storm drain system. c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons. 		

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>Air Quality Goals: Regional air quality which meets state and federal standards; and reduction in greenhouse gas emissions effecting climate change.</p> <p><i>CE-F.4.</i> Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.</p> <p><i>CE-F.6.</i> Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking.</p>	<p>Consistent with Policy CE-F.4, landscape improvements would be installed as part of the future projects and throughout the campus to absorb pollutants.</p> <p>The Master Plan Update contains pedestrian circulation guidelines which would include dedicated pedestrian-only walkways, axial paths connecting key destinations and sidewalks bordering roadways. Special paving, striping and/or raised speed tables would be used where pedestrians cross roadways. Trees, benches, and plazas would be expanded to foster walkability and higher levels of pedestrian activity on campus, consistent with Policy CE-F.6.</p>	Yes
<p>Biological Diversity Goals: Preservation of healthy, biological diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.</p> <p><i>CE-G.3.</i> Implement the conservation goals/policies of the City's MSCP Subarea Plan, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.</p>	<p>Impacts to biological resources are assessed in accordance with the MSCP Subarea Plan in Section 5.3, <i>Biological Resources</i>. Existing trails into the MHPA would be maintained. The Project would be consistent with Policy CE-G.3.</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>Sustainable Energy Goals: An increase in local energy independence through conservation, efficient community design, reduced consumption, and efficient production and development of energy supplies that are diverse, efficient, environmentally-sound, sustainable, and reliable.</p> <p><i>CE-I.4.</i> Maintain and promote water conservation and waste diversion programs to conserve energy.</p> <p><i>CE-I.7.</i> Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.</p> <p><i>CE-I.10.</i> Use renewable energy sources to generate energy to the extent feasible.</p>	<p>The Project would adhere to CBC requirements for water-conserving plumbing. All landscape and irrigation would conform to the Landscape Regulations and Landscape Standards of the LDC and other applicable City and regional standards. Drought-tolerant plant materials would be incorporated into landscape plans, in accordance with the Landscape Master Plan in the Design Guidelines. Therefore, the Project would be consistent with Policy CE-1.4.</p> <p>In accordance with the Sustainability features outlined in the Master Plan Update, new buildings would be designed to meet LEED silver or equivalent, which would minimize energy consumption. Renewable energy sources would be incorporated into project sites, to the extent feasible, such as the use photovoltaic panels (PV) to help provide campus power requirements. At athletic facilities (swimming pools), the campus would consider solar thermal systems to heat pool water. Use of green roofs can reduce roof temperatures and increase efficiency of PV panels. The Project would be consistent with Policy CE-I.10.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Conservation Element (cont.)		
<p>Urban Forestry Goal: Protection and expansion of a sustainable urban forest.</p> <p><i>CE-J.4.</i> Continue to require the planting of trees through the development permit process.</p> <p>a. Consider tree planting as mitigation for air pollution emissions, storm water runoff, and other environmental impacts as appropriate.</p>	<p>Implementation of the Master Plan Update Design Guidelines would ensure that trees would be incorporated into campus projects and improvements consistent with Policy CE-J.4.</p>	<p>Yes</p>
Noise Element		
<p>Noise and Land Use Compatibility Goal: Consider existing and future noise levels when making land use planning decisions to minimize people's exposure to excessive noise.</p> <p><i>NE-A.1.</i> Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.</p> <p><i>NE-A.2.</i> Ensure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.</p> <p><i>NE-A.3.</i> Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.</p>	<p>No excessive noise-generating uses are proposed on campus. An Acoustical Analysis was conducted on the Project, the results of which are presented in Section 7.1.6, <i>Noise</i>, of this report. Exterior noise levels at noise sensitive land uses would not exceed the noise-land use compatibility limits contained in Table NE-3. Potential impacts to the interior of student housing at Project Site No. 23 would be minimized through enhanced architectural treatments, required during building design. The Project would comply with Policies NE-A.1, NE-A.2, NE-A.3, and NE-A.4.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Noise Element (cont.)		
<p><i>NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.</p>		
<p>Motor Vehicle Traffic Noise Goal: Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.</p> <p><i>NE-B.1.</i> Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeway.</p> <p><i>NE-B.2.</i> Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise (see also Mobility Element, Policy ME-C.5 regarding traffic calming).</p> <p><i>NE-B.3.</i> Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.</p>	<p>Noise sensitive land uses proposed on campus would not be exposed to from highways or freeways. Traffic calming measures, such as raised crosswalks, would be installed along the campus loop road to slow vehicle speeds. The University has existing programs that encourage the use of alternative transit through connections to bus service on Linda Vista Road, preferred parking and charging stations for electric vehicles, carpool and clean fuel vehicles and bicycle facilities on campus. The Project would be consistent with Policies NE-B.1, NE-B.2, NE-B.3, and NE-B.4.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Noise Element (cont.)		
<p><i>NE-B.4.</i> Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic.</p> <p><i>NE.B.7.</i> Promote the use of berms, landscaping, setbacks, and architectural design where appropriate and effective, rather than conventional wall barriers to enhance aesthetics.</p>		
<p>Typical Noise Attenuation Methods Goal: Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.</p> <p><i>NE-I.1.</i> Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.</p> <p><i>NE-I.2.</i> Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.</p>	<p>An Acoustical Analysis was conducted on the Project, the results of which are presented in Section 7.1.6, <i>Noise</i>, of this report. Exterior noise levels at noise sensitive land uses would not exceed the noise-land use compatibility limits contained in Table NE-3. An evaluation of interior noise levels for the student housing at Project Site No. 23 would be required during building design to ensure compliance with the standards. The Project would be consistent with Policies NE-I.1, NE-I.2, and NE-I.3.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
CITY OF SAN DIEGO GENERAL PLAN (cont.)		
Noise Element (cont.)		
NE-I.3. Consider noise attenuation measures and techniques addressed by the Noise Element, as well as other feasible attenuation measures not addressed as potential mitigation measures, to reduce the effect of noise on future residential and other noise-sensitive land uses to an acceptable noise level.		
Historic Preservation Element		
<p>HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.</p> <p>HP-A.5. Designate and preserve significant historical and cultural resources for current and future generations.</p> <p>d. Enforce the Historical Resources Regulations and Guidelines of the Land Development Code that are aimed at identifying and preserving historical resources. Update these regulations and guidelines as needed to maintain adequate protection of historical resources.</p>	The Master Plan Update has treatment recommendations for any structured deemed historic during the implementation period of the plan. An analysis of the potential for historic resources is provided in Section 5.4, <i>Historical Resources</i> . Mitigation would be required should a structure be determined to be historic, consistent with the City's Historic Resources Regulations and LDC requirements, in accordance with Policies HP-A.2 and HP-A.5.	Yes

Table 5.1-1 (cont.)
CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION

Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN		
<p>Community Issues: The University continues to operate as a prestigious institution. Expansion of the University should be carefully planned to follow the existing architectural theme, maintain sensitive hillsides, minimize traffic flow through the community, and provide sufficient parking.</p> <ul style="list-style-type: none"> Promote the expansion of the University in a manner that positively affects the community. 	<p>Implementation of the Master Plan Update would focus campus growth internally within the campus boundaries and in a manner that respects the Linda Vista community. The Master Plan and Design Guidelines would direct expansion of the University to follow the existing architectural theme of the campus, maintain sensitive hillsides, minimize traffic flow through the community, and provide sufficient parking. This will be accomplished through application of guidelines in the General Plan, through conformance with the City's ESL Regulations, adherence to conditions of a SDP for development on hillsides, and through the traffic and parking improvements noted in the Transportation Impact Analysis for the Project.</p>	<p>Yes</p>
<p>Residential Element</p> <ul style="list-style-type: none"> Expand on-campus housing opportunities for students at USD. 	<p>The Master Plan Update would allow the campus to expand student housing supply so as to allow all first and second-year student to reside on campus consistent with this policy.</p>	<p>Yes</p>
<p>Community Facilities Element: The University continues to operate as a prestigious institution. Expansion of the University should be carefully planned to follow the existing architectural theme, maintain sensitive hillsides, minimize traffic flow through the community, and provide sufficient parking.</p>	<p>The Master Plan and Design Guidelines would direct expansion of the University to follow the existing architectural theme of the campus, maintain sensitive hillsides, minimize traffic flow through the community, and provide sufficient parking. This will be accomplished through application of guidelines in the General Plan, through conformance with the City's ESL Regulations, adherence to conditions of a SDP for development on hillsides, and through the traffic and parking improvements noted in the Transportation Impact Analysis for the Project.</p>	<p>Yes</p>

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>Open Space Element</p> <p>Goals:</p> <ol style="list-style-type: none"> 1. Preserve Tecolote Canyon and its tributary canyons as open space. 2. Protect public views to and from Tecolote Canyon and ensure that development adjacent to the canyon is visually compatible with the natural state of the canyon. 3. Preserve the remaining undeveloped canyons and slopes of Linda Vista to allow public use and enjoyment of these areas. <p>Policies:</p> <ol style="list-style-type: none"> 1. Designate the remaining undeveloped canyons and slopes as open space as depicted in Figure 15. 2. Sensitive resources, such as coastal sage scrub and riparian (stream side) vegetation, which occur within areas designated for open space, shall be preserved. 	<p>Implementation of the Master Plan Update place the southern slopes of the canyon and remaining slopes above Linda Vista Drive in an easement for their protection. None of the project sites identified in the Master Plan Update would encroach into the canyon or its open space. As discussed in Section 5.8, <i>Visual Effects/Neighborhood Character</i>, the campus would not adversely impact views from Tecolote Canyon. New buildings would be compatible in terms of height and scale as surrounding buildings, and would not be expected to result in a substantial visual change to viewers within Tecolote Canyon, since they would blend in with existing buildings, be partially obscured from view by intervening topography and setback from the edge of the canyon.</p> <p>The Design Guidelines outline grading techniques to minimize changes to natural landforms. Impacts to visual quality would not occur because the size, scale, architectural style, color, and exterior details of new buildings and facilities would be consistent with existing campus development and comply with applicable City regulations; buildings would be designed to take advantage of existing slopes and topography and provide breaks in facades to reduce the overall massing and scale; and all future construction would be required to comply with the guidelines for architectural design, landscaping, lighting, etc. outlined in the Master Plan Update Design Guidelines.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>3. New development adjacent to Tecolote Canyon should incorporate sensitive grading techniques, should set back from the rim of the canyon, and provide breaks between structures. Structures visible from the canyon should maintain a low profile so as not to be visually prominent from the canyon floor. Building materials which blend with the canyon should be used.</p> <p>4. New development should be clustered outside of areas designated for open space.</p>		
<p>Specific Proposals:</p> <p>1. Where necessary to allow development on hillsides in order to provide reasonable use of private property, limit the encroachment of grading and development according to a sliding scale based on the percent of the parcel which is affected by steep slopes.</p> <p>2. As a condition of development, all areas preserved as open space should be restricted by open space easement, dedication, or other means.</p> <p>3. Grading of hillsides should be designed to blend into the natural landforms. Steep cuts and fills should be avoided. A variable edge of development should be provided.</p>	<p>The majority of campus improvements would occur near the center of campus on the mesa; limited encroachment into steep slopes would occur under the Master Plan Update, as described in Section 5.8, <i>Visual Effects/Neighborhood Character</i>. Undeveloped portions of campus would be placed in an easement for their protection. The Project would comply with the Tecolote Canyon Natural Plan Master Plan as described below and with the MSCP Subarea Plan as discussed in Section 5.3, <i>Biological Resources</i>.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>8. The Tecolote Canyon Natural Park Master Plan should be used to guide future use of and development around the canyon.</p> <p>9. The University's Conditional Use Permit/ Resource Protection Ordinance (CUP/RPO) (as may be amended by future City Council action) should be used to guide future use and development of the campus.</p> <p>10. Development should comply with the City's Multiple Species Conservation Plan.</p>		
<p>Community Facilities Element</p> <p>Policies:</p> <p>1. Designate the campus for university use.</p> <p>2. The University, the Linda Vista Community Planning Committee, and the City should continue to work together to ensure that the growth, development, and operation of the University are compatible with the surrounding neighborhoods and the City as a whole.</p> <p>3. Impacts to the circulation system and on-street parking supply should be minimized. The use of alternative transit, such as buses and bicycles, should be encouraged by the University.</p>	<p>The campus is designated for Institutional and Open Space use in the Community Plan (see Figure 2-3).</p> <p>Impacts to the local circulation and parking are analyzed in the Transportation Impact Analysis for the Master Plan and summarized in Section 5.2, <i>Transportation/Circulation</i>. The University has existing programs that encourage the use of alternative transit through connections to bus service on Linda Vista Road, preferred parking and charging stations for electric vehicles, carpool and clean fuel vehicles and bicycle facilities on campus.</p> <p>The Master Plan Update would allow the campus to expand its student housing supply so as to allow all first and second-year students to reside on campus.</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
4. Encourage students, faculty, and staff to live on or near campus to reduce commuting distances.		
<p>Specific Proposals</p> <ol style="list-style-type: none"> 1. The University should continue to operate under the approved CUP/RPO. Development that is in conformance with the Master CUP will not require additional discretionary permits. Development which is not currently addressed by the CUP will require a site-specific CUP amendment or other discretionary permit. 2. Future student enrollment beyond 7,000 full-time equivalent students should be limited by the ability of the transportation system to handle the additional student traffic. 3. The University should maintain the existing 16th Century Spanish Renaissance theme in its new construction and rehabilitation of existing buildings. 4. Development on the campus should not encroach into designated open space and should respect and maintain scenic hillsides and sensitive vegetation. 	<p>The Master Plan Update would require a new CUP and other various other discretionary actions required for Project approval (see Section 3.0, <i>Project Description</i>). As demonstrated in the Transportation Impact Analysis and summarized in Section 5.2, <i>Transportation/Circulation</i>, the transportation system in the community would be able to accommodate an increase in student enrollment and impacts would be less than significant after mitigation is implemented, except in the Morena area where an improvement is not defined, funding is not secured and its timing is not known.</p> <p>In accordance with the Design Guidelines in the Master Plan Update, new structures and campus improvements would reflect the existing 16th Century Spanish Renaissance architectural style of the USD campus.</p> <p>The majority of campus improvements would occur near the center of campus on the mesa; limited encroachment into steep slopes would occur under the Master Plan Update, as described in Section 5.8, <i>Visual Effects/Neighborhood Character</i>. Undeveloped portions of campus would be placed in an easement for their protection.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>5. The University should provide on-campus parking for students, faculty, and employees. Any future expansion should emphasize structured parking rather than surface lots.</p> <p>6. The University should, if feasible, operate a shuttle to provide service between the Napa Street trolley station and the campus.</p>	<p>As outlined in the Master Plan Update, structured parking would be integrated into new buildings or expanded in the West campus area. Limited surface parking would also be provided. All parking would be expanded commensurate with needs as student enrollment increases over time.</p> <p>An integrated multi-modal transportation system is envisioned for the USD campus that encourages walking, biking, and transit use. The campus would continue to rely on its shuttle system to connect to the Old Town Transit Station, as well as to provide service to on-campus users. The Morena/Linda Vista Trolley Station currently connects the campus to downtown San Diego via the green line trolley service. Planned extension of the trolley line through the Morena area to the UTC/UCSD area would further improve alternative transportation options.</p>	
<p>Public Facilities Element</p> <p>1. Designate the campus for university use.</p> <p>2. The University, the Linda Vista Community Planning Committee, and the City should continue to work together to ensure that the growth, development, and operation of the University are compatible with the surrounding neighborhoods and the City as a whole.</p> <p>3. Impacts to the circulation system and on-street parking supply should be minimized. The use of alternative transit, such as buses and bicycles, should be encouraged by the University.</p>	<p>The University maintains a strong working relationship with the Linda Vista Community Planning Committee and City of San Diego staff. The University contributes to and works closely with the Planning Committee on a number of programs in the community.</p> <p>As outlined in the Master Plan Update, on-campus structured parking would be integrated into new buildings or expanded in the West campus area. Limited surface parking would also be provided. All parking would be expanded commensurate with needs as student enrollment increases over time.</p> <p>An integrated multi-modal transportation system is envisioned for the USD campus that encourages walking, biking, and transit use.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
4. Encourage students, faculty, and staff to live on or near campus to reduce commuting distances.	The Master Plan Update would allow the campus to expand its student housing supply so as to allow all first and second-year students to reside on campus.	
Transportation Element Goals: <ol style="list-style-type: none"> 1. Limit traffic congestion by designating appropriate land uses and intensity of residential, commercial, and industrial development within the community. 2. Maintain and improve the street system to enhance traffic flow. 3. Promote the use of transit and shuttle service. 4. Provide safe and pleasant pedestrian walkways and bikeways to connect residential neighborhoods, schools, parks, and commercial areas. 5. Provide adequate parking facilities. 6. Provide street landscaping along the major streets and at community entrances. Policies: <ol style="list-style-type: none"> 1. Maintain at least the existing level of bus service, and encourage the major educational institutions to supplement public transit with shuttle service. 	<p>The Master Plan Update would be a continuation and expansion of the academic, recreation, and housing uses that already exist in the community. Off-site intersection improvements, along with improved signage, lighting and pedestrian connectivity are proposed by the Master Plan Update. The University would continue to operate its shuttle system on- and off-campus, and possibly add more service in the future should the demand exist, to reduce congestion in and around campus, including trips to the Old Town Transit Station. Bus service would continue to serve the campus and its environs including the Morena/Linda Vista Trolley Station. Parking would be expanded commensurate with campus needs. Street trees would be installed along the frontage of projects fronting major streets (i.e., Linda Vista Road).</p>	Yes

<p>Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>Urban Design Element</p> <p>Goals:</p> <p>2. Maintain the non-obtrusive appearance of development adjacent to Tecolote Canyon</p> <p>Policies:</p> <p>4. Improve the appearance of the community by installing landscaping in medians of major streets and providing street trees as shown in Figures 26 and 27 and Tables 1 and 2.</p> <p>Specific Proposals: The following tables shall be used to guide the placement of street trees and landscaped medians. New development should install the plant species indicated in the manner required by the citywide landscape ordinance.</p> <p>2. The City should require the proper maintenance of landscaping in the public right-of-way, including trimming and maintenance of proper tree height for tree health, view preservation, and aesthetic considerations.</p>	<p>As discussed in Section 5.8, <i>Visual Effects/Neighborhood Character</i>, the Project would not adversely impact views from Tecolote Canyon. New buildings would be compatible in height and scale as surrounding buildings, and would not be expected to result in a substantial visual change to viewers within Tecolote Canyon, since they would blend in with existing buildings, be partially obscured from view by intervening topography and setback from the edge of the canyon. Street trees would be installed along frontages of major streets (i.e., Linda Vista Road). Any landscaping installed by the University would be maintained by their staff.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>Site-Specific Recommendations: Development on the USD campus shall be guided by the approved CUP/RPO and Master Plan Development Guidelines. Any future amendments to the CUP should consider the following principles. New development should continue to maintain the simplified 16th Century Spanish renaissance architectural style. Maintain a strong pedestrian access spine through the central portion of the campus. Surface parking areas should be discouraged in favor of structured parking on the eastern and western edges of campus. Where surface parking is provided, the parking should be designed to include landscaping and trees.</p> <p>Development on and Adjacent to Hillsides and Canyons: Grading and development of hillsides and canyons designated as open space should be avoided. When grading or development are necessary to provide reasonable use of private property, the following guidelines apply.</p> <p>1. Where feasible, projects should avoid construction on natural hillsides with slopes exceeding 25 percent. On existing legal parcels containing steep slopes (above 25 percent grade), limit encroachment into the hillside according to a sliding scale to ensure preservation of the hillside character while allowing reasonable development.</p>	<p>The Master Plan Update would require a new CUP as part of various other discretionary actions required for Project approval (see Section 3.0, <i>Project Description</i>). As stated in the Design Guidelines, the 16th Century Spanish renaissance architectural style would be used. Pedestrian linkages would be enhanced and expanded around the perimeter and core of the campus. Structured parking would be supplemented by small surface lots with landscaping and trees, in accordance with the Design Guidelines.</p> <p>The Master Plan Update proposes new structures throughout campus, the majority of which would occur within the developed areas. Only one of the projects would grade natural landforms, in particular steep slopes, as described in Section 5.8, <i>Visual Effects/Neighborhood Character</i>. Grading guidelines would be followed to ensure minimal changes in natural landforms. Approval of the proposed CUP would place the rest of the natural landforms into an easement for preservation.</p> <p>Drainage control would be designed in accordance with the City's Drainage Design Manual (2004), which is incorporated in the Land Development Manual. The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for development within the City.</p>	Yes

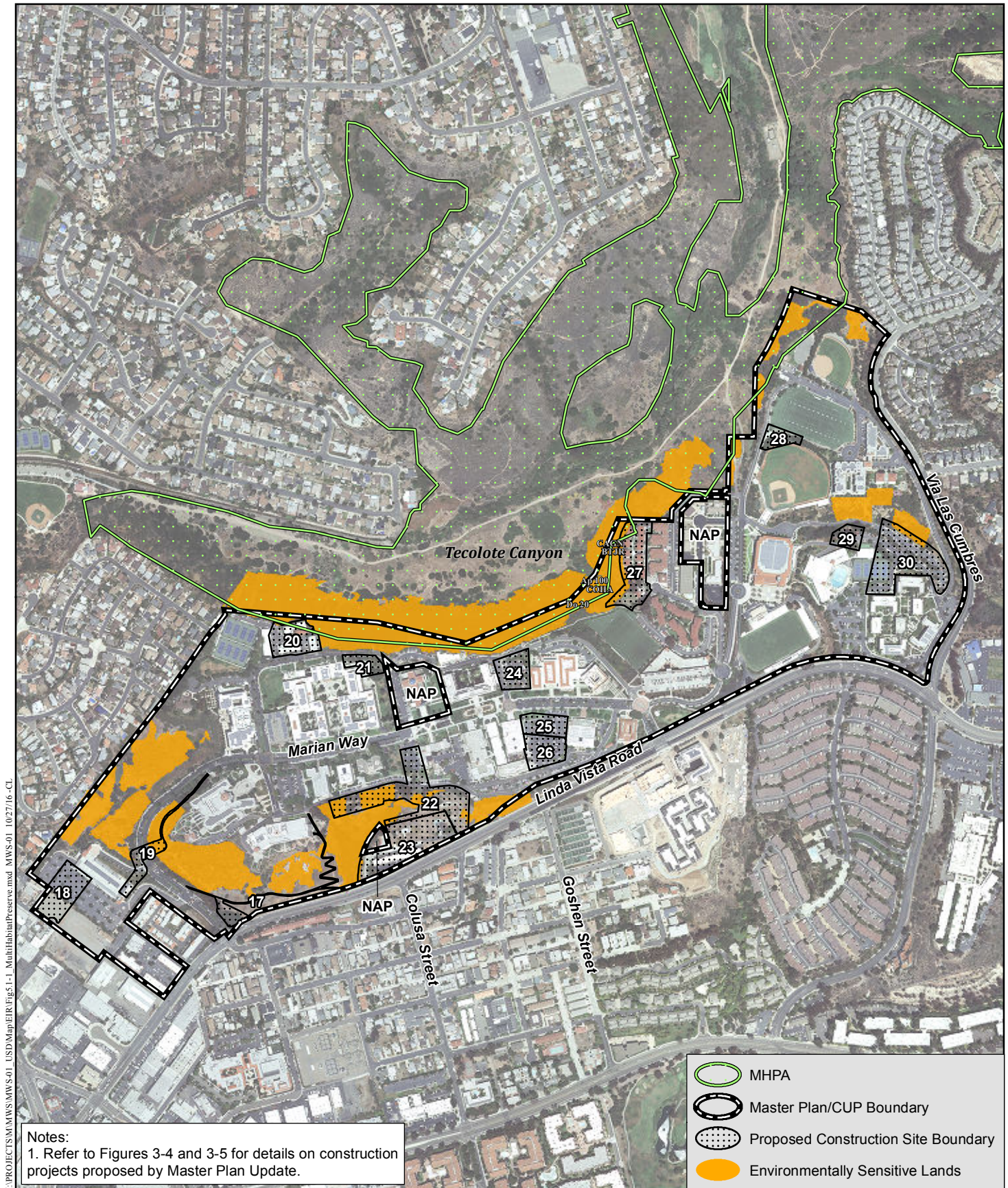
Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
LINDA VISTA COMMUNITY PLAN (cont.)		
<p>2. Structures shall be designed to fit into the natural terrain and preserve sensitive vegetation.</p> <p>3. Graded areas should be contoured and should not exceed a 2:1 ratio. Scarred slopes should be replanted with native vegetation.</p> <p>4. Structures located above Tecolote Canyon and Ulric Canyon shall be low profile and set back from the rim of the canyon. The facades of structures should be angled at varying degrees to follow the canyon rim. Rooflines should also vary in angle and height.</p> <p>5. Where new development is located on a hillside with street frontage, parking should be located on the street side or side yard portion of the site (not within the setback area).</p> <p>7. Structures should be clustered to preserve existing topography, vegetation, and public views.</p> <p>8. The natural surface drainage system of hillside sites should be maintained. The amount of hardscape should be minimized in order to minimize runoff onto the slopes, which causes erosion, landslides, and damage to plant and animal life.</p>		

<p>Table 5.1-1 (cont.)</p> <p>CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION</p>		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
TECOLOTE CANYON NATURAL PARK MASTER PLAN		
<p>Applicable Objectives:</p> <ul style="list-style-type: none"> Establish criteria and guidelines for the development of rim properties Preserve the canyon slopes, thus ensuring their stability and natural form, and further protect hillsides and natural areas from damage by off-road vehicles. Plant native plants in depleted areas for erosion control and restoration of areas disturbed by construction or grading. Preserve the open space to provide visual enjoyment, as well as to protect the natural habitat. 	<p>All canyon slopes on campus would be preserved in MHPA under the Master Plan Update. New construction near the canyon rim would redevelop existing developed land on campus. All areas temporarily disturbed during construction would be revegetated using native species, as specified in the Landscape Master Plan and objectives of the Design Guidelines. All remaining lands not planned for development would be placed in an easement for their protection.</p>	Yes
<p>Criteria for Rim Development:</p> <ul style="list-style-type: none"> <i>Grading and Landscaping</i> – Grading or landscaping shall not encroach within Tecolote Canyon Natural Park boundaries. Areas unavoidably disturbed (e.g., for installation of sewers) will be restored with native vegetation. New development and residents will be encourage to use plants in their landscaping that will provide some fire protection but will not “go feral,” thus disturbing native vegetation. <i>Drainage and Pollution</i> – Adequate control of storm drainage all the way to the Tecolote Canyon Creek channel and not just to the site boundary, must be required to prevent undue erosion. 	<p>No grading, landscaping, or utility improvements are proposed within Tecolote Canyon Natural Park. Drainage control and water quality management measures would be integrated into all new construction as required by the City's Drainage Design Manual and Storm Water Manual. The campus loop road would continue to parallel the canyon rim; no additional access points into the canyon would be created as part of the Master Plan Update.</p> <p>As discussed in Section 5.8, <i>Visual Effects/Neighborhood Character</i>, Project Site No. 27 would replace the Mission Housing Complex with several three-story-high buildings that would be set back further from the canyon rim than the existing buildings and broken into a series of smaller structures thus reducing its existing “wall” appearance from the canyon.</p>	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
TECOLOTE CANYON NATURAL PARK MASTER PLAN (cont.)		
<ul style="list-style-type: none"> <i>Streets</i> – Traffic flow should be parallel to or directed away from the canyon rim. Adequate access for service and emergency vehicles into Tecolote Canyon Natural Park must be considered but illegal off-road vehicles excluded. <i>Buildings</i> – Structures on the canyon rim should have low visual impact from the floor of the canyon. Buildings should be no more than two stories. Structural requirements would include a setback from the edge of the canyon in order to avoid a “wall” effect. There should be see through spaces between buildings to further reduce a wall-like impression. 		
TECOLOTE CANYON RIM DEVELOPMENT GUIDELINES		
Recommendations – Grading: <ul style="list-style-type: none"> Grading operations should not occur during the rainy season between October 1 and April 1 of any year. A serrated grading technique should be used on graded hillsides in order to help guarantee successful revegetation. Grading would be phased to allow prompt revegetation and reconstruction to control erosion. Grading into areas of native vegetation should be discouraged. 	Grading operations would be restricted in accordance with the City's Grading Ordinance and would comply with the Design Guidelines in the Master Plan Update and the City requirements in its LDC. No grading of native vegetation within the canyon is contemplated in the Master Plan Update.	Yes

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
TECOLOTE CANYON RIM DEVELOPMENT GUIDELINES (cont.)		
Recommendations - Drainage: <ul style="list-style-type: none"> Natural runoff patterns and water velocity should be maintained, unless a change would improve existing conditions. Runoff velocity should be non-scouring and of a degree such that no armoring of a channel is required. Runoff should be directed away from Tecolote Canyon. If runoff must be directed into the canyon, control measures should control runoff all the way to Tecolote Creek. During construction, erosion and runoff should be repaired as part of the project. Runoff and erosion control techniques should be techniques outlined in the Erosion and Sediment Control Handbook, California Department of Conservation, or in an equivalent resource document. As part of the project design process, applicants should consult with appropriate design and engineering professionals and with the Soil Conservation Service, U.S. Department of Agriculture, when designing runoff and erosion control methods. 	<p>Drainage control and water quality management measures would be integrated into all new construction as required by the City's Drainage Design Manual and Storm Water Manual. The City would review the design to ensure they comply with applicable local regulations.</p>	<p>Yes</p>

Table 5.1-1 (cont.) CITY OF SAN DIEGO LAND USE GOALS, OBJECTIVES, AND POLICIES CONSISTENCY EVALUATION		
Applicable Elements, Goals, and Policies	Consistency Evaluation	Consistent (Yes/No)
TECOLOTE CANYON RIM DEVELOPMENT GUIDELINES (cont.)		
Recommendations – Landscaping: <ul style="list-style-type: none"> Areas containing significant native vegetation should be preserved. Revegetation programs should use “non-reseeding” species to hold soil until native vegetation can be established. 	No impacts to native vegetation within the canyon is proposed as part of the Master Plan Update; slopes within the canyon that occur on campus would be preserved in the MHPA. Revegetation would be in accordance with the Landscape Master Plan.	Yes
Recommendations – Fire Protection: All development projects should incorporate fire protective measures in construction, site design, and landscaping at a level sufficient to provide reasonable protection for development located adjacent to high fire fuel load areas.	The University would comply with all applicable fire code and brush management requirements, including the Brush Management Requirements contained within SDMC Section 142.0412, specifically Zone 1 and Zone 2 requirements.	Yes



Multi-Habitat Preserve Area/Environmentally Sensitive Lands

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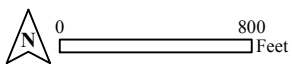


Figure 5.1-1

5.2 Transportation/Circulation

This section evaluates potential traffic-related impacts associated with the proposed Project under Existing, Near-Term (2019) and Long-Term (2035) conditions. The following discussion is based on a Transportation Impact Analysis (TIA) prepared for the Project by Linscott, Law & Greenspan Engineers (LLG 2016). Applicable portions of the TIA are summarized below, with the complete report included as Appendix C of this SEIR.

5.2.1 Existing Conditions

Traffic Study Area

Identification of the traffic study area was based on the criteria identified in the previously described *City Traffic Impact Study Manual* (1998) and San Diego Traffic Engineers' Council (SANTEC)/Institute of Transportation Engineers (ITE) Guidelines for Traffic Impact Studies. Specifically, these criteria require that a traffic study area include the following:

- All street segments where the project will add 50 or more peak hour trips in either direction.
- Mainline freeway locations where the project will add 50 or more peak hour trips in either direction.
- Metered freeway ramps where the project will add 20 or more peak hour trips.

In addition, the study area locations reflect the Project trip distribution analysis provided in the TIA (and summarized below in Section 5.2.2), and represent the most likely locations to be impacted by Project traffic. As a result, the Project study area includes 27 intersections, 26 street segments, 2 freeway mainline segments, and 2 freeway ramp meters, as outlined below and shown on Figure 5.2-1, *Existing Circulation System Facilities*.

Existing Intersections

Existing peak hour operations for the 27 study area intersections are outlined in Table 5.2-1, *Existing Study Area Intersection Descriptions and Operations*. As seen from the data in Table 5.2-1, the following three intersections are calculated to currently operate at level of service LOS E or worse:

- Intersection No. 11: Linda Vista Road/Colusa Street – LOS E during the PM peak hour
- Intersection No. 18: Linda Vista Road/Genesee Avenue – LOS E during the PM peak hour
- Intersection No. 26: Friars Road/Ulric Street/State Route 163 (SR-163) southbound (SB) Ramps – LOS E during the AM peak hour and LOS F during the PM peak hour

**Table 5.2-1
EXISTING STUDY AREA INTERSECTION DESCRIPTIONS AND OPERATIONS**

Intersection	Control Type	Peak Hour	Existing	
			Delay ¹	LOS ²
1. Sea World Dr/Pacific Hwy	Signal	AM	19.0	B
		PM	26.4	C
2. Sea World Dr/I-5 SB Ramps	Signal	AM	27.5	C
		PM	28.4	C
3. Sea World Dr/I-5 NB Ramps	Signal	AM	29.8	C
		PM	47.3	D
4. Tecolote Rd/Morena Blvd	Signal	AM	40.4	D
		PM	37.5	D
5. Buenos Ave/Morena Blvd	Signal	AM	9.9	A
		PM	11.8	B
6. Morena Blvd/W. Morena Blvd	Signal	AM	21.8	C
		PM	16.0	B
7. Napa St/Morena Blvd	Signal	AM	27.0	C
		PM	32.7	C
8. Linda Vista Rd/Morena Blvd	Signal	AM	15.5	B
		PM	17.5	B
9. Linda Vista Rd/Napa St	Signal	AM	37.9	D
		PM	52.6	D
10. Linda Vista Rd/Marian Way	Signal	AM	28.4	C
		PM	29.8	C
11. Linda Vista Rd/Colusa St	MSSC ³	AM	23.5	C
		PM	39.3	E
12. Linda Vista Rd/Alcalá Pkwy	Signal	AM	28.9	C
		PM	28.2	C
13. Linda Vista Rd/Alcalá Vista Apts Ent	MSSC ³	AM	17.0	C
		PM	27.8	D
14. Linda Vista Rd/Via Las Cumbres	Signal	AM	25.4	C
		PM	28.2	C
15. Linda Vista Rd/Kramer St	Signal	AM	10.6	B
		PM	9.4	A
16. Linda Vista Rd/Comstock St	Signal	AM	18.8	B
		PM	26.5	C
17. Linda Vista Rd/Ulric St	Signal	AM	18.0	B
		PM	31.0	C
18. Linda Vista Rd/Genesee Ave	Signal	AM	51.0	D
		PM	71.2	E
19. Friars Rd/Sea World Dr	Signal	AM	13.5	B
		PM	18.6	B
20. Friars Rd/Napa St	Signal	AM	14.5	B
		PM	11.8	B
21. Friars Rd/Colusa St	Signal	AM	11.4	B
		PM	12.9	B
22. Friars Rd/Via Las Cumbres	Signal	AM	12.6	B
		PM	13.9	B

Table 5.2-1 (cont.) EXISTING STUDY AREA INTERSECTION DESCRIPTIONS AND OPERATIONS				
Intersection	Control Type	Peak Hour	Existing	
			Delay ¹	LOS ²
23. Friars Rd/Fashion Valley Rd	Signal	AM	12.1	B
		PM	23.7	C
24. Friars Rd/Via de la Moda	Signal	AM	8.3	A
		PM	14.8	B
25. Friars Rd/Avenida de las Tiendas	Signal	AM	9.3	A
		PM	18.6	B
26. Friars Rd/Ulric St/SR-163 SB Ramps	Signal	AM	58.0	E
		PM	81.3	F
27. Friars Rd/SR-163 NB Ramps	Signal	AM	20.6	C
		PM	24.7	C

Source: LLG 2016

¹ The typical measure of effectiveness used to describe operating conditions for intersections, roadway segments and freeway segments is level of service (LOS), which is a qualitative measure of performance taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, safety and motorist perception. LOS designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst. LOS designations are reported differently for roadway segments, freeway segments, signalized intersections, and un-signalized intersections. Additional discussion of operating condition thresholds for intersections, roadway/freeway segments, and ramp meters is provided below under the discussion of Impact Thresholds in Subsection 5.2.2, *Impact*.

² Level of Service

³ MSSC: Minor-Street-STOP-Controlled intersection, minor street left-turn delay and LOS reported
SB = Southbound; NB = Northbound

Existing Roadway Segments

The principal roadways in the Project study area are described briefly below, followed by a summary of current operational status. Ultimate classifications for roadways are based on designations in the Linda Vista Community Plan, except for Friars Road which includes applicable classification data from the Linda Vista and Mission Valley community plans (refer to Figure 5.2-1 for roadway locations).

Linda Vista Road is classified as a four-lane major roadway and exhibits the following current built conditions within the Project study area: (1) a four-lane collector with a striped median and intermittent two-way left-turn lane (TWLTL) between Morena Boulevard and Via Las Cumbres; and (2) a four-lane major road with a raised median Between Kramer and Comstock streets, and between Ulric Street and Genesee Avenue. Bike lanes and sidewalks are present, curbside parking is prohibited, and the posted speed limit is 40 miles per hour (mph). Linda Vista Road is generally surrounded by commercial, residential, and institutional (i.e., USD, Francis Parker School, Mark Twain High School, San Diego County Office of Education) land uses in the Project study area.

Morena Boulevard includes the following classifications in the Project study area: (1) a four-lane major roadway from the overpass at Friars Road to the split with West Morena Boulevard; (2) a three-lane collector from West Morena Boulevard to Tecolote Road; and (3) a two-lane collector north of Knoxville Street. This roadway is currently built as a four-lane divided roadway with a raised median from the Friars Road underpass to the West Morena Boulevard split, and a two-lane collector with a central two-way-left-turn lane between West Morena Boulevard and Tecolote Road.

Sidewalks and bike lanes are present, curbside parking is prohibited between Friars Road and West Morena Boulevard, and parking is allowed on both sides of the roadway north of West Morena Boulevard. The posted speed limit is 35 mph, with the described portions of Morena Boulevard generally surrounded by commercial, light industrial and residential land uses.

Friars Road forms the boundary between the Linda Vista and Mission Valley Communities, and is a classified roadway in both associated community plans (with incremental classification inconsistencies between the two documents, as outlined below). The Linda Vista Community Plan provides the following classifications for Friars Road: (1) a four-lane major arterial from just west of Napa Street to Fashion Valley Road; (2) a six-lane major arterial between Fashion Valley Road and the SR-163 Interchange; and (3) a six-lane primary arterial east of the State Route 163 (SR-163) Interchange. In the Mission Valley Community Plan, Friars Road is classified as: (1) a four-lane major arterial from just east of Napa Street to Colusa Street; (2) a six-lane major arterial between Colusa Street and the SR-163 Interchange; and (3) an eight-lane primary arterial between the SR-163 Interchange and Mission Center Road.

Friars Road is currently built as follows in the Project study area: (1) a four-lane divided roadway with a raised median between Napa and Colusa streets; (2) a four-lane roadway with an intermittent TWLTL and striped median between Colusa Street and Fashion Valley Road; (3) a five-lane roadway with three eastbound travel lanes, two westbound travel lanes, and a raised median from Fashion Valley Road to Avenida de las Tiendas; and (4) a six-lane facility with a raised median between Avenida de las Tiendas and SR-163. Bike lanes and sidewalks are provided along the described roadway segments, with a posted speed limit of 45 mph. The described portions of Friars Road generally front residential, commercial, open space (San Diego River corridor), and recreational uses.

Napa Street connects Friars Road and Morena Boulevard and is classified as a four-lane major roadway. Napa Street is currently built as: (1) a four-lane divided roadway with a striped and raised median from Friars Road to Linda Vista Road; and (2) a four-lane undivided roadway from Linda Vista Road to Morena Boulevard. No bike lanes are provided, with sidewalks present on both sides of the roadway and curbside parking permitted intermittently. The posted speed limit is 25 mph, with the Napa Street generally fronting commercial and multi-family residential land uses.

Sea World Drive is currently classified as a five-lane prime arterial between Pacific Highway and I-5. This roadway segment is currently built as a five-lane major road, with a striped median, sidewalks, bike lanes, and curbs present. The posted speed limit is 40 mph and curbside parking is not permitted. Existing land use along the described segment of this roadway consists of previously disturbed open space.

Tecolote Road is the eastern extension of Sea World Drive (east of I-5), and is classified as a four-lane major road from the I-5 Ramps to Morena Boulevard. It is currently built to its ultimate classification as a four-lane major road, with a raised median, sidewalks, bike lanes and curbs. The posted speed limit is 40 mph and curbside parking is not permitted. The described segment of Tecolote Road is bordered by residential and commercial uses.

Colusa Street is classified as a two-lane collector between Friars and Linda Vista Roads, and is currently built as a two-lane roadway along this segment. Curbside parking is permitted along both sides of the roadway, with sidewalks present, no bike lanes, a posted speed limit of 25 mph, and adjacent land uses consisting generally of multi-family residential sites.

Via Las Cumbres is classified as a four-lane collector from Friars Road to Linda Vista Road, and as a two-lane collector north of Linda Vista Road. Along this stretch it is currently built as a three-lane undivided roadway, with two northbound travel lanes and one southbound travel lane. A sidewalk is provided on the west side of the roadway from Friars Road to Camino Costanero, with sidewalks then provided further north on both sides of the roadway. A bike lane is provided on the east side of the roadway beginning approximately 75 feet north of Friars Road and continuing to Linda Vista Road, with a Class III bike route (i.e., a shared bike/travel lane, or sharrow) provided on the west side of the roadway between Friars Road and Camino Costanero. This sharrow then transitions to a bike lane from Camino Costanero north to Linda Vista Road. North of Linda Vista Road, a sharrow is provided on the east side of the roadway and a bike lane is provided on the west side. The posted speed limit is 35 mph, curbside parking is allowed intermittently, and the described segments are generally surrounded by university and multi-family residential land uses.

The existing classifications and operational status for the 26 study area roadway segments are outlined in Table 5.2-2, *Existing Study Area Roadway Segment Descriptions and Operations*. As seen from the data in Table 5.2-2, the following four roadway segments are calculated to currently operate at LOS E or worse:

- Segment No. 3: Morena Boulevard; Tecolote Road to Buenos Avenue – LOS F
- Segment No. 4: Morena Boulevard; Buenos Avenue to W. Morena Boulevard – LOS F
- Segment No. 7: Morena Boulevard; Linda Vista Road to I-8 Ramps – LOS E
- Segment No. 9: Linda Vista Road; Napa Street to Marian Way/Mildred St – LOS E

Table 5.2-2 EXISTING STUDY AREA ROADWAY SEGMENT DESCRIPTIONS AND OPERATIONS					
Street Segment and Number	Functional Classification ¹	LOS E Capacity ²	Existing		
			ADT ³	LOS ⁴	V/C ⁵
Sea World Drive					
1. Pacific Hwy to I-5 Ramps	5-Lane Major Road	45,000	31,969	C	0.710
Tecolote Road					
2. I-5 to Morena Blvd	4-Lane Major Road	40,000	24,008	C	0.600
Morena Boulevard					
3. Tecolote Rd to Buenos Ave	2-Lane Collector w/ TWLTL ⁶	15,000	15,598	F	1.040
4. Buenos Ave to W. Morena Blvd	2-Lane Collector w/ TWLTL ⁶	15,000	16,603	F	1.107
5. W. Morena Blvd to Napa St	4-Lane Major Road	40,000	28,903	C	0.723
6. Napa St to Linda Vista St	4-Lane Major Road	40,000	23,023	C	0.576
7. Linda Vista Rd to I-8 Ramps	4-Lane Major Road	40,000	37,129	E	0.928

**Table 5.2-2 (cont.)
EXISTING STUDY AREA ROADWAY SEGMENT DESCRIPTIONS AND OPERATIONS**

Street Segment and Number	Functional Classification ¹	LOS E Capacity ²	Existing		
			ADT ³	LOS ⁴	V/C ⁵
Linda Vista Road					
8. Morena Blvd to Napa St	4-Lane Collector	30,000	22,190	D	0.740
9. Napa St to Marian Way/Mildred St	4-Lane Collector	30,000	26,868	E	0.896
10. Marian Way/Mildred St to Colusa St	4-Lane Collector	30,000	18,880	C	0.629
11. Colusa St to Alcalá Pkwy	4-Lane Collector	30,000	18,938	C	0.631
12. Alcalá Pkwy to Via Las Cumbres	4-Lane Collector	30,000	17,401	C	0.580
13. Via Las Cumbres to Kramer St	4-Lane Collector	30,000	14,381	C	0.479
14. Kramer St to Comstock St	4-Lane Major Road	40,000	15,480	B	0.387
15. Comstock St to Ulric St	4-Lane Collector	30,000	16,548	C	0.552
16. Ulric St to Genesee Ave	4-Lane Major Road	40,000	23,429	C	0.568
Friars Road					
17. Napa St to Colusa St	4-Lane Major Road	40,000	19,611	B	0.490
18. Colusa St to Via Las Cumbres	4-Lane Major Road	40,000	18,646	B	0.466
19. Via Las Cumbres to Fashion Valley Rd	4-Lane Major Road	40,000	24,046	C	0.601
20. Fashion Valley Rd to Via de la Moda	5-Lane Major Road	45,000	25,247	C	0.561
21. Via de la Moda to Avenida de las Tiendas	5-Lane Major Road	45,000	30,063	C	0.668
22. Avenida de las Tiendas to SR-163 SB Ramps	6-Lane Major Road	50,000	41,993	D	0.840
Napa Street					
23. Friars Rd to Linda Vista Rd	4-Lane Collector	30,000	17,703	B	0.443
24. Linda Vista Rd to Morena Blvd	4-Lane Collector	30,000	24,265	C	0.607
Colusa Street					
25. Friars Rd to Linda Vista Rd	2-Lane Collector	8,000	2,190	A	0.274
Via Las Cumbres					
26. Friars Rd to Linda Vista Rd	3-Lane Collector	15,000	7,858	C	0.524

Source: LLG 2016

¹ The current classification at which the roadway functions.

² The capacity corresponding to the functional classification of the roadway per City of San Diego Classification table.

³ Average daily traffic

⁴ Level of Service

⁵ Volume to capacity ratio

⁶ Two-way left-turn lane

Existing Freeway Segments

Interstate 5 (I-5) is a major north-south freeway providing regional connectivity between San Diego, Orange, and Los Angeles counties (and areas further north). It has a posted speed limit of 65 mph, and generally consists of eight travel lanes in the north-south direction with additional auxiliary lanes in the Project study area.

State Route 163 (SR-163) is a north-south freeway providing interregional connectivity between downtown San Diego and Interstate 15 to the north. It has a posted speed limit of 65 mph, and generally consists of eight travel lanes in the north-south direction with additional auxiliary lanes in the Project study area.

Interstate 8 (I-8) is a major east-west freeway providing regional connectivity between San Diego and Imperial counties (and areas further east). It has a posted speed limit of 65 mph and generally

consists of eight travel lanes in the east-west direction with additional auxiliary lanes in the Project study area.

The existing configurations and operational status for local freeway segments are provided in Table 5.2-3, *Existing Freeway Mainline Descriptions and Operations*. As seen in this table, all freeway segments within the Project study area currently operate at an acceptable LOS (D or better).

Table 5.2-3 EXISTING FREEWAY MAINLINE DESCRIPTIONS AND OPERATIONS										
Freeway Segment	Dir.	Lanes ¹	Hourly Capacity ²	ADT ³	Peak Hour Volume		V/C ⁴		LOS ⁵	
					AM	PM	AM	PM	AM	PM
Interstate 5										
Sea World Dr to I-8	NB	4/1	9,200	206,700	7,545	7,337	0.820	0.798	D	C
	SB	4/2	10,400		7,428	7,139	0.714	0.686	C	C
Interstate 8										
Morena Blvd to Taylor Street	WB	5/0	10,000	201,500	7,180	7,081	0.718	0.708	C	C
	EB	4/1	9,200		5,778	7,354	0.628	0.799	C	C

Source: LLG 2016

¹ Number of mainline lanes/number of auxiliary lanes.

² Capacity calculated at 2000 vehicles per hour (vph) per travel lane, and 1200 vph per auxiliary lane.

³ Existing ADT volumes obtained directly from the freeway Performance Measurement System (PeMS) website.

⁴ Volume to capacity ratio

⁵ Level of Service

NB = Northbound, SB = Southbound, WB = Westbound, EB = Eastbound

Existing Freeway Ramp Meters

Existing ramp meter operations evaluated in the Project TIA include the I-5/Sea World Drive (Tecolote Road) northbound and southbound on-ramps. As shown in Table 5.2-4, *Existing Ramp Meter Operations*, the northbound on-ramp is calculated to have no delay during the AM and PM peak hours, while the SB on-ramp is calculated to have 10 minutes of delay during the AM peak hour and 24 minutes of delay during the PM peak hour.

As previously noted, the ramp meter analysis was conducted using the fixed-rate approach, which produces exaggerated queue lengths and delays. Accordingly, the results are theoretical and based on the most restrictive ramp meter rates produced by Caltrans (as ramp meter rates are not constant, even within the peak hours). That is, actual meter rates dynamically adjust based on the level of traffic on the freeway mainlines, with these adjustments not reflected in the fixed-rate approach (which also does not take into account driver behavior such as "ramp shopping" or trip diversion).

Field observations were conducted during the PM peak hour to determine the actual maximum observed delay and maximum observed queue experienced at the I-5 southbound on-ramp at Sea World Drive. The maximum delay was observed to be approximately three minutes, with an associated maximum queue of 540 feet. As a result, the ramp meter delay and queue results provided in Table 5.2-4 are overstated and do not represent actual conditions.

Table 5.2-4 EXISTING RAMP METER OPERATIONS ¹						
Location/Condition	Peak Hour	Peak Hour Flow ¹	Discharge Rate ²	Excess Demand ¹	Delay ³	Queue ⁴
Sea World Dr to NB I-5 – 2 SOV						
Existing	AM	652	965	0	10	0
	PM	624	972	0	0	0
Sea World Dr to SB I-5 – 1 SOV + 1 HOV						
Existing	AM	371 ⁵	318	53	10	1,315
	PM	447 ⁵	318	129	24	3,228

Source: LLG 2016

¹ Vehicles per hour per lane.

² Ramp meter discharge rates obtained from Caltrans. Most restrictive rate used when a range of discharge rates are provided.

³ Calculated delay in minutes per lane.

⁴ Calculated queue length in feet per lane.

⁵ 15 percent reduction in volume due to HOV lane.

SOV = Single Occupancy Vehicle, HOV = High Occupancy Vehicle, NB = Northbound, SB = Southbound

Existing Alternative Transportation System

Bicycle Network

As outlined above under the discussion of Existing Roadway Segments, the following bicycle network facilities are provided along study area roadways: (1) bike lanes are present along both sides of Linda Vista Road, Morena Boulevard, Friars Road, Sea World Drive, and Tecolote Road; (2) a combination of bike lanes and sharrows is present along Via Las Cumbres; and (3) no bike lanes or sharrows are present along Colusa and Napa streets. The described local bicycle network generally does not extend within the USD campus, which also has limited bicycle facilities.

Transit Services

The following transit-related facilities and programs are currently in place at USD and the surrounding area and used by students, faculty, and staff to commute to USD:

- The USD campus is located along the San Diego Metropolitan Transit System (MTS) Bus Route 44, which runs between Old Town and the Community of Clairemont. Bus Route 44 includes several local stops along Linda Vista Road, including locations near the Mildred Street, Colusa Street, Brunner Street, and Goshen Street intersections, as well as the Alcalá Vista Apartments Entrance.
- The USD campus is within 0.5 mile of the Morena/Linda Vista Trolley Station, and is approximately 0.9 mile north of the Old Town Transit Center.
- The Green Trolley Line and Bus Route 105 also provide transit service near the campus, with the Green Trolley Line providing service between Old Town and Santee, and Bus Route 105 providing service along Morena Boulevard between the Westfield UTC Shopping Mall and Old Town.

In addition to the above described MTS services, USD provides the following free shuttle services for the use of students and staff that commute to and from USD. This includes on- and off-campus shuttle services that currently accommodate approximately 160,000 student trips each semester.

- The following free on-campus shuttle services are available every 7 to 12 minutes during the week, and every 15 to 20 minutes on the weekend between 6:30 AM and 12:00 AM: (1) the Torero Express serves the Manchester Village Apartments and the Alcalá Vista Apartments, with this loop designed to transport resident students to the center of campus and including stops Law School Circle, the Jenny Craig Pavilion, Manchester Village and the Alcalá Vista Apartments; (2) the Mission Loop serves the eastern half of the campus, with stops at Law School Circle, Mission Crossroads, Manchester Village, and the Alcalá Vista Apartments; and (3) the Barcelona Express serves the western half of the campus, with stops at the West Parking Structure, Marian Way Uphill, Olin Hall Eastbound, Immaculate/Colachis Plaza, Copley Library and Marian Way Downhill.
- A free off-campus shuttle service is available from Old Town to the USD campus at 30-minute intervals between 6:45 AM and 10:15 AM, and between 3:00 PM through 8:00 PM. This service provides a link for students using the trolley to commute to USD, with associated stops including the Old Town Transit Center, the West Parking Structure, Marian Way Uphill, Olin Hall Eastbound, Immaculata/Colachis Plaza, Copley Library, Marian Way Downhill, and Mother Rose Hill Hall.

Pedestrian Facilities

Sidewalks are provided along both sides of study area roadway segments as follows: (1) both sides of Linda Vista Road, Morena Boulevard, Friars Road, Napa Street, Sea World Drive, Tecolote Road, and Colusa Street; and (2) intermittently along both sides of Via Las Cumbres.

The USD campus is relatively compact, with students, faculty, staff, and visitors typically able to reach most areas on foot within 5 to 10 minutes from the center of campus at Colachis Plaza.

The primary pedestrian routes on campus are limited to sidewalks along on-campus roads which connect to a central pedestrian area referred to as Colachis Plaza (refer to Figure 3-2).

Transportation Demand Management

In addition to the alternative transportation services and facilities described above, USD also has a number of established Transportation Demand Management (TDM) programs designed to reduce the number of vehicle trips associated with campus operations. Specifically, these include the following:

- Provision of morning and evening tram service between the USD campus and the Old Town Transit Center.
- Issuance of discounted student MTS passes for bus, trolley, and coaster service.
- Provision of "Zimride" carpooling services to connect USD students, faculty, and staff interested in carpooling.

- Use of a “Zip Car” car sharing service, with two Zip Cars currently available for hourly rental on campus.
- Issuance of free carpool permits (two or more people per vehicle) to commuter students, faculty, and staff.
- Provision of free “Fresh Air” parking permits to faculty and staff, to allow employees who normally use alternate modes of transportation to commute to work, (e.g., bicycle, trolley, carpool, etc.) to park on campus up to 16 times per semester.
- Issuance of discounted “Super Shuttle” fares for trips between USD and the San Diego International Airport (SDIA).

5.2.2 Impact

Issue 1: Would the proposal result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?

Issue 2: Would the proposal result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?

Issue 3: Would the proposal have a substantial impact upon existing or planned transportation systems?

Impact Thresholds

In accordance with the City Significance Determination Thresholds (2011), traffic/circulation impacts would be significant if the project would result in any of the following conditions:

- Any intersection, roadway segment, or freeway segment affected by the project would operate at LOS E or F under either direct or cumulative conditions, and the project exceeds the thresholds shown in Table 5.2-5, *Traffic Impact Significance Thresholds*; and/or
- A substantial amount of traffic would be added to a congested freeway segment, interchange, or ramp as shown in Table 5.2-6.

**Table 5.2-5
TRAFFIC IMPACT SIGNIFICANCE THRESHOLDS**

Level of Service with Project ²	Allowable Increase Due to Project Impacts ¹					
	Freeways		Roadway Segments		Intersections	Ramp Metering ³
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
E	0.010	1.0	0.02	1.0	2.0	2.0
F	0.005	0.5	0.01	0.5	1.0	1.0

Source: City of San Diego 2011

¹ If proposed project traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that will restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see footnote 2), or if the project adds a significant amount of peak hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the direct significant and/or cumulatively considerable traffic impacts of the project.

² All LOS measurements are based on Highway Capacity Manual procedures for peak hour conditions. The V/C ratios for roadway segments, however, are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City Traffic Impact Study Manual [1998]). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped locations). For metered freeway ramps, LOS does not apply, although ramp meter delays above 15 minutes are considered excessive.

³ The allowable increases in delay at a ramp meter with more than 15 minutes of existing delay are 2 minutes for freeway LOS E, and 1 minute and for freeway LOS F.

Delay = Average control delay per vehicle measured in seconds for intersections, or minutes for ramp meters

LOS = Level of Service

V/C = Volume to capacity ratio (capacity at LOS E should be used)

Speed = Arterial speed measured in miles per hour for Congestion Management Program Plan (CMP) analyses

Per the City Significance Determination Thresholds, direct traffic impacts are defined as those projected to occur at the time a proposed development becomes operational, including other developments not presently operational but which are anticipated to be operational at that time (Near-Term). Cumulative traffic impacts are defined as those projected to occur at some point after a proposed development becomes operational, such as during subsequent phases of a project and when additional proposed developments in the area become operational (short-term cumulative) or when the affected community plan area reaches full planned buildout (Long-Term cumulative).

If the project exceeds the thresholds in Table 5.2-5, then the project is considered to have a significant direct or cumulative project impact, as defined. A significant impact can also occur if a project causes the LOS to degrade from D to E, even if the allowable increases in Table 5.2-5 are not exceeded. A feasible mitigation measure will need to be identified to return the impact within the associated City thresholds, or the impact will be considered significant and unmitigated.

In addition, if project impacts are projected to result in an increase in V/C greater than 0.02 for a segment operating at LOS E without the project, or greater than 0.01 for a segment operating at LOS F without the project (per Table 5.2-5), and the segment is built to its ultimate classification, an alternative analysis can be provided to assess segment impacts. Specifically, such an alternative analysis would determine whether: (1) the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the project; and (2) a peak hour Highway Capacity Manual (HCM) arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the project. If both intersections at the end of the segment operate acceptably, and the peak hour HCM arterial analysis for the same segment shows the segment operates acceptably, then the project impacts are determined to be less than significant and no mitigation is required.

Impact Analysis

Previously Disclosed Transportation/Circulation Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to traffic circulation and parking based on a maximum of 7,000 FTE students, as opposed to 10,000 FTE students for the Master Plan Update. The 1996 analysis concluded that the proposed Master Plan would result in significant impacts at a number of off-site intersections and roadways. An associated mitigation measure was identified to require intersection improvements at Linda Vista Road/Mildred Street and the new west to east campus entry (i.e., Alcalá Parkway) on Linda Vista Road.

The 1996 Master Plan FEIR cumulative traffic analysis concluded that one street segment, East Morena Boulevard, would operate at an unacceptable LOS F in the Existing, Existing Plus Year 2000 Project, Existing Plus Year 2015 Project conditions. Significant unmitigated cumulative impacts to traffic were identified. Because this condition was a regional issue that was not the responsibility of any one project to mitigate, no mitigation was identified for this impact. No other significant cumulative impacts were identified.

The 1996 Master Plan FEIR did not identify any significant impacts related to parking capacity, and no associated mitigation measures were proposed.

Impacts from Master Plan Update

The following discussion focuses on the potential transportation/circulation impacts associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Transportation Impact Analysis Methodology

The Project TIA (LLG 2016) analyzed potential effects to study area intersections, street segments, freeway segments, and ramp meters under several Near-Term (2019) and Long-Term (2035) conditions, with and without the Project. A summary of trip generation and distribution methodology is provided below, followed by evaluations of the following Near-Term and Long-Term impact scenarios (except Existing, as noted): (1) Existing (outlined above in Section 5.2.1); (2) Existing + Cumulative Projects (i.e., Near-Term); (3) Near-Term + Project; (4) Year 2035 Without Project; and (5) Year 2035 + Project.

Trip Generation/Distribution

The following sources were used to determine the appropriate trip generation rates for the proposed Project:

- City of San Diego. The City of San Diego Trip Generation manual has a rate of 2.5 ADT per student for Universities.
- Traffic Circulation and Parking Report for the Proposed USD Master Plan EIR. The trip rate in the 1996 technical document upon which the 1996 Master Plan FEIR is based was 3.38 ADT per FTE student for USD.

- Memo dated May 3, 2010 (Kimley Horn and Associates). The trip generation rate in this memo is slightly higher than the 1996 rate, at 3.4 ADT per FTE student for USD, and is based on actual driveway counts conducted at USD.

Based on the above information, a trip rate of 3.4 ADT per FTE student was used to calculate Project trip generation under Near-Term (2019) conditions, which proposes an additional 750 FTE students (150 additional FTE students per year over a period of five years). Near-Term trip generation is summarized in Table 5.2-6, *Near-Term Project Trip Generation*.

Table 5.2-6 NEAR-TERM PROJECT TRIP GENERATION											
Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour				PM Peak Hour			
		Rate	Volume	% of ADT	In : Out		Volume		% of ADT	In : Out	
					Split	In	Out	Split		In	Out
University (4 Years)	750 FTE	3.4/FTE	2,550	6%	90 : 10	138	15	8%	40 : 60	82	122

Source: LLG 2016

Project trip generation under Long-Term (2035) conditions, which assumes the entire 3,000 additional FTE students, was calculated using an adjusted rate of 3.1 ADT per FTE student. Specifically, this rate incorporates the USD requirement that all second year students live on campus, as well as buildout of the proposed Project residential components (which would increase the number of students living on campus and reduce the overall trip rate to and from campus). Long-Term trip generation is summarized in Table 5.2-7, *Long-Term Project Trip Generation*.

Table 5.2-7 LONG-TERM PROJECT TRIP GENERATION											
Land Use	Size	Daily Trip Ends (ADTs)		AM Peak Hour				PM Peak Hour			
		Rate	Volume	% of ADT	In : Out		Volume		% of ADT	In : Out	
					Split	In	Out	Split		In	Out
University (4 Years)	3,000 FTE	3.1/FTE	9,300	6%	90 : 10	502	56	8%	40 : 60	298	446

Source: LLG 2016

The described Project trips were distributed to the study area roadway network as shown on Figure 5.2-2, *Project Trip Distribution*. Project only traffic volumes are shown on Figures 5.2-3, *Near-Term Project Traffic Volumes*, and 5.2-4, *Long-Term Project Traffic Volumes*.

Near-Term Impact Scenarios

As previously indicated, cumulative conditions encompass other projects in the study area that will add traffic to the local circulation system in the near future. Based on research conducted for the cumulative condition, nine projects were identified for inclusion in the traffic study as discussed in Section 7.0, *Cumulative Projects*, of the TIA (Appendix C). Traffic generated by the identified cumulative projects was added to the existing traffic volumes to develop the Near-Term volumes

(without the proposed Project), with the resulting conditions for study area intersections, roadway/freeway segments and ramp meters outlined below.

Traffic generated by the proposed Project was then added to the Near-Term traffic volumes to develop the Near-Term + Project volumes, with the resulting conditions at intersections, roadway/freeway segments and ramp meters outlined below and associated traffic volumes shown on Figure 5.2-5, *Near-Term + Project Traffic Volumes*.

Intersection Conditions. As seen from the data in Table 5.2-8, *Near-Term Intersection Operations*, the following intersections are calculated to operate at LOS E or worse in the Near-Term scenario:

- Intersection No. 11: Linda Vista Road/Colusa Street – LOS E during the PM peak hour
- Intersection No. 18: Linda Vista Road/Genesee Avenue –LOS E during the PM peak hour
- Intersection No. 26: Friars Road/Ulric Street/SR-163 SB Ramps – LOS E during the AM and LOS F during the PM peak hours

Based on the City significance thresholds provided in Table 5.2-5, the addition of Project traffic to the Near-Term condition would result in significant direct impacts at the following three intersections:

- Intersection No. 9: Linda Vista Road/Napa Street – LOS E during the PM peak hour
- Intersection No. 11: Linda Vista Road/Colusa Street – LOS F during the PM peak hour
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance – LOS E during the PM peak hour

**Table 5.2-8
NEAR-TERM INTERSECTION OPERATIONS**

Intersection	Control Type	Peak Hour	Near-Term		Near-Term + Project		Δ Delay ³	Significant Impact?
			Delay ¹	LOS ²	Delay	LOS		
1. Sea World Dr/Pacific Hwy	Signal	AM	19.0	B	19.0	B	0.0	No
		PM	26.4	C	26.4	C	0.0	No
2. Sea World Dr/I-5 SB Ramps	Signal	AM	27.8	C	28.7	C	0.9	No
		PM	28.4	C	29.0	C	0.6	No
3. Sea World Dr/I-5 NB Ramps	Signal	AM	29.8	C	31.1	C	1.3	No
		PM	47.5	D	48.3	D	0.8	No
4. Tecolote Rd/Morena Blvd	Signal	AM	41.1	D	43.2	D	2.1	No
		PM	37.7	D	38.6	D	0.9	No
5. Buenos Ave/Morena Blvd	Signal	AM	9.9	A	10.0	A	0.1	No
		PM	11.8	B	11.8	B	0.0	No
6. Morena Blvd/W. Morena Blvd	Signal	AM	22.1	C	22.4	C	0.3	No
		PM	16.3	B	18.2	C	1.9	No
7. Napa St/Morena Blvd	Signal	AM	27.3	C	27.7	C	0.4	No
		PM	32.6	C	32.8	C	0.2	No
8. Linda Vista Rd/Morena Blvd	Signal	AM	16.0	B	16.0	B	0.0	No
		PM	17.7	B	18.0	B	0.3	No

Table 5.2-8 (cont.)
NEAR-TERM INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour	Near-Term		Near-Term + Project		Δ Delay ³	Significant Impact?
			Delay ¹	LOS ²	Delay	LOS		
9. Linda Vista Rd/Napa St	Signal	AM	39.1	D	40.6	D	1.5	No
		PM	53.5	D	55.5	E	2.0	Direct
10. Linda Vista Rd/Marian Way	Signal	AM	28.4	C	33.2	C	4.8	No
		PM	29.7	C	31.5	C	1.8	No
11. Linda Vista Rd/Colusa St	MSSC ⁴	AM	25.6	C	28.5	D	2.9	No
		PM	41.0	E	50.9	F	9.9	Direct
12. Linda Vista Rd/Alcalá Pkwy	Signal	AM	44.1	D	46.6	D	2.5	No
		PM	30.8	C	31.7	C	0.9	No
13. Linda Vista Rd/Alcalá Vista Apts Ent	MSSC ⁴	AM	17.4	C	19.4	C	2.0	No
		PM	29.6	D	38.5	E	8.9	Direct
14. Linda Vista Rd/Via Las Cumbres	Signal	AM	25.4	C	26.2	C	0.8	No
		PM	29.9	C	30.5	C	0.6	No
15. Linda Vista Rd/Kramer St	Signal	AM	10.6	B	10.9	B	0.3	No
		PM	9.5	A	9.5	A	0.0	No
16. Linda Vista Rd/Comstock St	Signal	AM	18.7	B	18.8	B	0.1	N
		PM	26.4	C	26.6	C	0.2	No
17. Linda Vista Rd/Ulric St	Signal	AM	18.0	B	18.0	B	0.0	No
		PM	31.0	C	32.8	C	1.8	No
18. Linda Vista Rd/Genesee Ave	Signal	AM	46.7	D	47.4	D	0.7	No
		PM	68.5	E	69.5	E	1.0	No
19. Friars Rd/Sea World Dr	Signal	AM	13.5	B	13.6	B	0.1	No
		PM	18.6	B	18.7	B	0.1	No
20. Friars Rd/Napa St	Signal	AM	14.6	B	14.7	B	0.1	No
		PM	11.9	B	12.0	B	0.1	No
21. Friars Rd/Colusa St	Signal	AM	11.6	B	12.1	B	0.5	No
		PM	13.1	B	13.8	B	0.7	No
22. Friars Rd/Via Las Cumbres	Signal	AM	13.5	B	13.7	B	0.2	No
		PM	14.2	B	14.7	B	0.5	No
23. Friars Rd/Fashion Valley Rd	Signal	AM	12.2	B	12.2	B	0.0	No
		PM	24.0	C	24.0	C	0.0	No
24. Friars Rd/Via de la Moda	Signal	AM	8.3	A	8.4	A	0.1	No
		PM	14.8	B	14.8	B	0.0	No
25. Friars Rd/Avenida de las Tiendas	Signal	AM	9.2	A	9.2	A	0.0	No
		PM	18.4	B	18.4	B	0.0	No
26. Friars Rd/Ulric St/SR-163 SB Ramps	Signal	AM	60.9	E	61.4	E	0.5	No
		PM	92.9	F	93.8	F	0.9	No
27. Friars Rd/163 NB Ramps	Signal	AM	20.7	C	20.8	C	0.1	No
		PM	25.0	C	25.3	C	0.3	No

Source: LLG 2016

¹ Average intersection delay per vehicle in seconds

² Level of Service

³ Increase in delay due to Project traffic

⁴ MSSC: Minor-Street-STOP-Controlled intersection. Minor Street left-turn delay and LOS reported

Bold and shaded indicates significant impact

Roadway Segment Conditions. Based on the data in Table 5.2-9, *Near-Term Segment Operations*, the following roadway segments are calculated to operate at LOS E or worse in the Near-Term scenario (without the proposed Project):

- Segment No. 3: Morena Boulevard; Tecolote Road to Buenos Avenue – LOS F
- Segment No. 4: Morena Boulevard; Buenos Avenue to W. Morena Boulevard – LOS F
- Segment No. 7: Morena Boulevard; Linda Vista Road to I-8 Ramps – LOS E
- Segment No. 9: Linda Vista Road; Napa Street to Marian Way/Mildred St – LOS E

In the Near-Term + Project condition, significant direct impacts would occur along one roadway segment (refer to Table 5.2-9):

- Segment No. 9: Linda Vista Road; Napa Street to Marian Way/Mildred St – LOS E

As shown in Table 5.2-9, the City significance thresholds would also be exceeded along segments Nos. 3, 4, and 7 on Morena Boulevard, as well as segment No. 9 on Linda Vista Road. Because the Morena Boulevard segments are built to their ultimate classification, however, an alternative analysis was conducted by LLG to assess whether significant impacts would occur. Specifically, if the alternative analysis determine that: (1) the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the Project; and (2) a peak hour HCM arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the Project, then the Project impacts are determined to be less than significant and no mitigation is required.

The resulting arterial analysis conducted in the TIA for the described segments of Morena Boulevard is provided in Table 5.2-10, *Near-Term + Project Arterial Operations*. As shown in this table, the noted segments of Morena Boulevard would operate at LOS D or better in both directions during the AM and PM peak hours under Near-Term + Project conditions. As a result, because, these segments are built to their ultimate classification and both alternative analysis conditions are met, the associated Near-Term + Project condition impacts along the described segments of Morena Boulevard are determined to be less than significant and no mitigation is required.

**Table 5.2-9
NEAR-TERM SEGMENT OPERATIONS**

Street Segment	Functional Classification ¹	LOS E Capacity ²	Near-Term			Near-Term + Project			Δ V/C ⁶	Significant Impact?
			ADT ³	LOS ⁴	V/C ⁵	ADT	LOS	V/C		
Sea World Drive										
1. Pacific Hwy to I-5 Ramps	5-Lane Major Road	45,000	31,969	C	0.710	32,099	C	0.713	0.003	No
Tecolote Road										
2. I-5 to Morena Blvd	4-Lane Major Road	40,000	24,008	C	0.600	24,388	C	0.610	0.010	No
Morena Boulevard										
3. Tecolote Rd to Buenos Ave	2-Lane Collector w/ TWLTL	15,000	15,669	F	1.045	16,129	F	1.075	0.030	No ⁷
4. Buenos Ave to W. Morena Blvd	2-Lane Collector w/ TWLTL	15,000	16,664	F	1.112	17,134	F	1.142	0.030	No ⁷
5. W. Morena Blvd to Napa St	4-Lane Major Road	40,000	29,060	C	0.727	29,620	C	0.741	0.014	No
6. Napa St to Linda Vista St	4-Lane Major Road	40,000	23,023	C	0.576	23,023	C	0.576	0.000	No
7. Linda Vista Rd to I-8 Ramps	4-Lane Major Road	40,000	37,392	E	0.935	37,982	E	0.950	0.015	No ⁷
Linda Vista Road										
8. Morena Blvd to Napa St	4-Lane Collector	30,000	22,463	D	0.749	23,053	D	0.768	0.019	No
9. Napa St to Marian Way/Mildred St	4-Lane Collector	30,000	27,333	E	0.911	28,553	E	0.952	0.041	Direct
10. Marian Way/Mildred St to Colusa St	4-Lane Collector	30,000	19,418	C	0.647	19,978	C	0.666	0.019	No
11. Colusa St to Alcalá Pkwy	4-Lane Collector	30,000	19,488	C	0.650	20,178	D	0.673	0.023	No
12. Alcalá Pkwy to Via Las Cumbres	4-Lane Collector	30,000	17,837	C	0.595	18,857	C	0.629	0.034	No
13. Via Las Cumbres to Kramer St	4-Lane Collector	30,000	14,607	C	0.487	15,147	C	0.505	0.018	No
14. Kramer St to Comstock St	4-Lane Major Road	40,000	15,686	B	0.392	16,146	B	0.404	0.012	No
15. Comstock St to Ulric St	4-Lane Collector	30,000	16,740	C	0.558	17,150	C	0.572	0.014	No
16. Ulric St to Genesee Ave	4-Lane Major Road	40,000	23,602	C	0.590	23,962	C	0.599	0.009	No
Friars Road										
17. Napa St to Colusa St	4-Lane Major Road	40,000	19,804	B	0.495	19,954	B	0.499	0.004	No
18. Colusa St to Via Las Cumbres	4-Lane Major Road	40,000	18,805	B	0.470	19,035	B	0.476	0.006	No
19. Via Las Cumbres to Fashion Valley Rd	4-Lane Major Road	40,000	24,444	C	0.611	24,954	C	0.624	0.013	No
20. Fashion Valley Rd to Via de la Moda	5-Lane Major Road	45,000	25,738	C	0.572	26,098	C	0.580	0.008	No
21. Via de la Moda to Avenida de las Tiendas	5-Lane Major Road	45,000	30,887	C	0.686	31,247	C	0.694	0.008	No

**Table 5.2-9 (cont.)
 NEAR-TERM SEGMENT OPERATIONS**

Street Segment	Functional Classification ¹	LOS E Capacity ²	Near-Term			Near-Term + Project			Δ V/C ⁶	Significant Impact?
			ADT ³	LOS ⁴	V/C ⁵	ADT	LOS	V/C		
Napa Street										
22. Avenida de las Tiendas to SR-163 SB Ramps	6-Lane Major Road	50,000	42,812	D	0.856	43,142	D	0.863	0.007	No
23. Friars Rd to Linda Vista Rd	4-Lane Collector	30,000	17,727	B	0.443	17,797	B	0.445	0.002	No
24. Linda Vista Rd to Morena Blvd	4-Lane Collector	30,000	24,422	C	0.611	24,982	C	0.625	0.014	No
Colusa Street										
25. Friars Rd to Linda Vista Road	2-Lane Collector	8,000	2,224	A	0.278	2,604	B	0.326	0.048	No
Via Las Cumbres										
26. Friars Rd to Linda Vista Rd	3-Lane Collector	15,000	8,077	C	0.538	8,407	C	0.560	0.022	No

Source: LLG 2016

¹ The current classification at which the roadway functions.

² The capacity corresponding to the functional classification of the roadway per City of San Diego classification table.

³ Average daily traffic

⁴ Level of Service

⁵ Volume to capacity ratio

⁶ Increase in V/C ratio due to Project traffic

⁷ Peak hour arterial analysis indicates LOS D or better operations; therefore, no significant impact is calculated.

Bold and shaded indicates significant impact.

Table 5.2-10 NEAR-TERM + PROJECT ARTERIAL OPERATIONS				
Arterial Segment	Peak Hour	Direction	Speed ¹	LOS ²
Morena Blvd 3. Tecolote Road to Buenos Avenue	AM	NB	15.7	D
		SB	25.2	B
	PM	NB	15.3	D
		SB	23.6	C
Morena Blvd 4. Buenos Avenue to West Morena Blvd	AM	NB	20.8	C
		SB	16.6	D
	PM	NB	21.9	C
		SB	16.1	D
Morena Blvd 7. Linda Vista Road to I-8	AM	NB	29.3	B
		SB	32.4	A
	PM	NB	29.2	B
		SB	32.4	A

Source: LLG 2016

¹ miles per hour

² Level of Service

Freeway Mainline Conditions. Based on the information in Table 5.2-11, *Near-Term Freeway Mainline Segment Operations*, the study area freeway mainline segments are calculated to operate at acceptable levels of service (LOS D or better) during the AM and PM peak hours.

As seen in Table 5.2-11, all freeway mainline segments within the study area would continue to operate at acceptable levels of service during the AM and PM peak hours under the Near-Term + Project scenario. Accordingly, no associated significant impacts would result in the Near-Term condition with Project traffic taken into consideration.

Table 5.2-11
NEAR-TERM FREEWAY MAINLINE SEGMENT OPERATIONS

Table 5.2-11 NEAR-TERM FREEWAY MAINLINE SEGMENT OPERATIONS																			
Freeway and Segment	Direction, Number of Lanes and Capacity ¹			Near-Term						Near-Term + Project						Delta ³		Significant Impact?	
				Peak Hour Volume		V/C ²		LOS		Peak Hour Volume		V/C		LOS					
				AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
Interstate 5																			
Sea World Dr to I-8	NB	4M + 1A	9,200	7,583	7,362	0.824	0.800	D	D	7,590	7,366	0.825	0.801	D	D	0.001	0.001	No	No
	SB	4M + 2A	10,400	7,442	7,188	0.716	0.691	C	C	7,443	7,194	0.716	0.692	C	C	0.000	0.001	No	No
Interstate 8																			
Morena Blvd to Taylor St	WB	5M	10,000	7,194	7,127	0.719	0.713	C	C	7,202	7,132	0.720	0.713	C	C	0.001	0.000	No	No
	EB	4M + 1A	9,200	5,814	7,379	0.632	0.802	C	D	5,815	7,386	0.632	0.803	C	D	0.000	0.001	No	No

Source: LLG 2016

¹ Capacity = 2,000 vehicles per hour per lane (mainline), 1,200 vehicles per hour per lane (auxiliary)

² Volume to capacity ratio

³ Increase in V/C ratio due to Project traffic

M = mainline, A = auxiliary lane

Ramp Meter Conditions. Based on the data in Table 5.2-12, *Near-Term Ramp Meter Operations*, the following delays are calculated for the Near-Term scenario: (1) the northbound on-ramp is calculated to have no delay during the AM and PM peak hours; and (2) the southbound on-ramp is calculated to have 10 minutes of delay during the AM peak hour and 24 minutes of delay in the PM peak hour. It should be noted that the ramp meter analysis was conducted using the fixed-rate approach, which generally tends to produce exaggerated queue lengths and delays as discussed in Section 5.2.1. Ramp meter conditions would not change substantially with the Project in place in the Near-Term Condition.

Per City of San Diego Significance Thresholds, the allowable increase in delay at a ramp meter with more than 15 minutes of delay and freeway LOS E is 2 minutes and at LOS F is 1 minute. While the southbound on-ramp is calculated to have 25 minutes of delay during the PM peak hour, which is considered excessive under City of San Diego guidelines, a project-related significant direct impact is not calculated since the Project adds only one minute of delay, and the corresponding freeway mainline segment (I-5 southbound between SeaWorld Drive and I-8) is calculated to operate at LOS C with the addition of Project traffic, as shown in Table 5.2-12.

Table 5.2-12 NEAR-TERM RAMP METER OPERATIONS						
Location/Condition	Peak Hour	Peak Hour Flow¹	Discharge Rate²	Excess Demand¹	Delay³	Queue⁴
Sea World Drive to NB I-5 – 2 SOV Lanes						
Near-Term	AM	666	965	0	0	0
	PM	634	972	0	0	0
Near-Term + Project	AM	667	965	0	0	0
	PM	643	972	0	0	0
Sea World Drive to SB I-5 – 1 SOV + 1 HOV Lane						
Near-Term	AM	371 ⁵	318	53	10	1,315
	PM	447 ⁵	318	129	24	3,228
Near-Term + Project	AM	371 ⁵	318	53	10	1,336
	PM	452 ⁵	318	134	25	3,355

Source: LLG 2016

¹ Vehicles per hour per lane

² Ramp meter discharge rates obtained from Caltrans. Most restricted rate used when a range of discharge rates are provided.

³ Calculated delay in minutes per lane

⁴ Calculated queue length in feet per lane

⁵ 15 percent reduction in volume due to HOV lane

SOV = Single Occupancy Vehicle, HOV = High Occupancy Vehicle, NB = Northbound, SB = Southbound.

Long-Term Impact Scenarios

The Long-Term (Year 2035) analysis incorporates a number of assumptions regarding regional and local roadway system improvements (as well as the previously described trip generation and distribution data). Specifically, these include the following, with additional supporting information for these assumptions provided in Section 9.0, *Analysis of Long-Term (2035) Scenarios*, of the TIA: (1) Phase I of the SR-163 / Friars Road Interchange Project and the proposed extension of Hazard Center Drive under SR-163; (2) the proposed extension of Camino de La Reina from Fashion Valley Road to Via Las Cumbres; (3) the proposed extension of Via Las Cumbres between Friars Road and

Hotel Circle North; and (4) the proposed future north leg of the Linda Vista Road/Colusa Street intersection identified as a Project feature under the Year 2035 + Project scenario.

Traffic generated by the proposed Project was added to the Year 2035 traffic volumes to develop the Year 2035 + Project volumes, with the resulting conditions to intersections, roadway/freeway segments and ramp meters outlined below and associated traffic volumes shown on Figure 5.2-6, *Year 2035 + Project Traffic Volumes*.

Intersection Conditions. Based on the information provided in Table 5.2-13, *Long-Term Intersection Operations*, the following intersections are calculated to operate at LOS E or worse in the Year 2035 Without Project scenario:

- Intersection No. 1: Sea World Drive/Pacific Highway – LOS F during the PM peak hour
- Intersection No. 3: Sea World Drive/I-5 NB Ramps – LOS F during the AM and PM peak hours
- Intersection No. 9; Linda Vista Road/Napa Street – LOS E during the PM peak hour
- Intersection No. 11: Linda Vista Road/Colusa Street – LOS F during the PM peak hour
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance – LOS F during the PM peak hour
- Intersection No. 18: Linda Vista Road/Genesee Avenue – LOS E during the AM and LOS F during the PM peak hour
- Intersection No. 19: Friars Road/Sea World Drive – LOS E during the PM peak hour
- Intersection No. 25: Friars Road/Avenida de las Tiendas – LOS E during the PM peak hour
- Intersection No. 27: Friars Road/SR-163 NB Ramps – LOS F during the PM peak hour

Based on the City significance thresholds provided in Table 5.2-5, the noted conditions under the Year 2035 + Project scenario would result in significant cumulative impacts at the following four intersections:

- Intersection No. 9: Linda Vista Road /Napa Street – LOS E during AM peak hour and LOS F during PM peak hour
- Intersection No. 11: Linda Vista Road/Colusa Street – LOS F during AM and PM peak hours
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance - LOS F during AM and PM peak hours
- Intersection No. 18: Linda Vista Road/Genesee Avenue - LOS E during the AM and LOS F during the PM peak hours

**Table 5.2-13
LONG-TERM INTERSECTION OPERATIONS**

Intersection	Control Type	Peak Hour	Year 2035 Without Project		Year 2035 + Project		Δ Delay ³	Significant Impact?
			Delay ¹	LOS ²	Delay	LOS		
1. Sea World Dr/Pacific Hwy	Signal	AM	48.8	D	48.8	D	0.0	No
		PM	137.1	F	137.4	F	0.3	No
2. Sea World Dr/I-5 SB Ramps	Signal	AM	46.4	D	49.1	D	2.7	No
		PM	41.2	D	53.2	D	12.0	No
3. Sea World Dr/I-5 NB Ramps	Signal	AM	83.3	F	84.3	F	1.0	No
		PM	168.8	F	169.4	F	0.6	No
4. Tecolote Rd/Morena Blvd	Signal	AM	49.3	D	54.5	D	5.2	No
		PM	49.5	D	54.5	D	5.0	No
5. Buenos Ave/Morena Blvd	Signal	AM	15.7	B	15.8	B	0.1	No
		PM	17.7	B	18.2	B	0.5	No
6. Morena Blvd/W. Morena Blvd	Signal	AM	22.4	C	27.3	C	4.9	No
		PM	27.8	C	41.7	D	13.9	No
7. Napa St/Morena Blvd	Signal	AM	24.8	C	25.4	C	0.6	No
		PM	36.2	C	38.9	D	2.7	No
8. Linda Vista Rd/Morena Blvd	Signal	AM	20.2	C	20.5	C	0.3	No
		PM	21.4	C	23.4	C	2.0	No
9. Linda Vista Rd/Napa St	Signal	AM	51.6	D	68.9	E	≥10	Cumulative
		PM	78.7	E	>100	F	≥10	Cumulative
10. Linda Vista Rd/Marian Way	Signal	AM	38.3	D	53.7	D	15.4	No
		PM	32.6	C	48.2	D	15.6	No
11. Linda Vista Rd/Colusa St	MSSC ⁴	AM	31.6	D	70.1	F	>10	Cumulative
		PM	66.9	F	>300	F	>10	Cumulative
12. Linda Vista Rd/Alcalá Pkwy	Signal	AM	27.1	C	40.8	D	13.7	No
		PM	25.5	C	34.4	C	8.9	No
13. Linda Vista Rd/Alcalá Vista Apts Entrance	MSSC ⁴	AM	28.6	D	61.6	F	33.0	Cumulative
		PM	>200	F	>300	F	>10	Cumulative
14. Linda Vista Rd/Via Las Cumbres	Signal	AM	26.9	C	38.0	D	11.1	No
		PM	27.0	C	29.7	C	2.7	No
15. Linda Vista Rd/Kramer St	Signal	AM	17.3	B	18.0	B	0.7	No
		PM	15.7	B	16.5	B	0.8	No

**Table 5.2-13 (cont.)
LONG-TERM INTERSECTION OPERATIONS**

Intersection	Control Type	Peak Hour	Year 2035 Without Project		Year 2035 + Project		Δ Delay ³	Significant Impact?
			Delay ¹	LOS ²	Delay	LOS		
16. Linda Vista Rd/Comstock St	Signal	AM	19.1	B	19.3	B	0.2	No
		PM	24.1	C	24.5	C	0.4	No
17. Linda Vista Rd/Ulric St	Signal	AM	25.6	C	28.3	C	2.7	No
		PM	34.8	C	38.0	D	3.2	No
18. Linda Vista Rd/Genesee Ave	Signal	AM	64.5	E	65.2	E	0.7	No
		PM	82.2	F	82.8	F	0.6	No
19. Friars Rd/Sea World Dr	Signal	AM	26.4	C	27.7	C	1.3	No
		PM	63.1	E	64.7	E	1.6	No
20. Friars Rd/Napa St	Signal	AM	25.8	C	26.9	C	1.1	No
		PM	19.5	B	20.8	C	1.3	No
21. Friars Rd/Colusa St	Signal	AM	39.7	D	49.6	D	9.9	No
		PM	44.2	D	54.0	D	9.8	No
22. Friars Rd/Via Las Cumbres	Signal	AM	30.1	C	32.2	D	2.1	No
		PM	53.5	D	54.0	D	0.5	No
23. Friars Rd/Fashion Valley Rd	Signal	AM	25.6	C	26.4	C	0.8	No
		PM	40.3	D	41.3	D	1.0	No
24. Friars Rd/Via de la Moda	Signal	AM	4.5	A	4.6	A	0.1	No
		PM	26.8	C	26.8	C	0.0	No
25. Friars Rd/Avenida de las Tiendas	Signal	AM	15.7	B	15.8	B	0.1	No
		PM	60.0	E	61.5	E	1.5	No
26. Friars Rd/Ulric St/SR-163 SB Ramps	Signal	AM	45.3	D	45.5	D	0.2	No
		PM	50.9	D	52.8	D	1.9	No
27. Friars Rd/SR-163 NB Ramps	Signal	AM	49.8	D	51.9	D	2.1	No
		PM	111.7	F	112.1	F	0.4	No

¹ Average intersection delay per vehicle in seconds

² Level of Service

³ Increase in delay due to Project traffic

⁴ MSSC: Minor-Street-STOP-Controlled intersection. Minor Street left-turn delay and LOS reported

Bold and shaded indicates significant impact

Roadway Segment Conditions. Based on the data in Table 5.2-14, *Long-Term Segment Operations*, the following roadway segments are calculated to operate at LOS E or worse in the Year 2035 Without Project scenario:

- Segment No. 1: Sea World Drive; Pacific Highway to I-5 Ramps – LOS F
- Segment No. 3: Morena Boulevard; Tecolote Road to Buenos Avenue - LOS F

- Segment No. 4: Morena Boulevard; Buenos Avenue to W. Morena Boulevard - LOS F
- Segment No. 5: Morena Boulevard; W. Morena Boulevard to Napa Street - LOS E
- Segment No. 7: Morena Boulevard; Linda Vista Road to I-8 Ramps - LOS F
- Segment No. 17: Friars Road; Napa Street to Colusa Street - LOS E
- Segment No. 18: Friars Road; Colusa Street to Via Las Cumbres - LOS F
- Segment No. 22: Friars Road; Avenida de las Tiendas to Avenida del Rio - LOS F
- Segment No. 23: Friars Road; Avenida del Rio to SR-163 SB Ramps - LOS F

In the Long-Term condition, with Project traffic taken into account in the Year 2035 With Project scenario, cumulatively significant impacts would occur along two roadway segments on Friars Road that comprise one segment in the Near-Term condition (refer to Table 5.2-14):

- Segment No. 22: Friars Road: Avenida de las Tiendas to Avenida del Rio - LOS F
- Segment No. 23: Friars Road: Avenida del Rio to SR-163 SB Ramps - LOS F

As shown in Table 5.2-14, the City Significance Thresholds would also be exceeded along the following six listed segments: (1) Segments Nos. 3, 4, 5, and 7 along Morena Boulevard; and (2) Segment Nos. 17 and 18 along Friars Road. Because these segments are built to their ultimate classification, however, an alternative analysis was conducted by LLG to assess whether cumulatively significant impacts would occur. Specifically, if the alternative analysis determine that: (1) the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the Project; and (2) a peak hour HCM arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the Project, then the Project impacts are determined to be less than significant and no mitigation is required.

The resulting arterial analysis conducted in the TIA for the described segments of Morena Boulevard and Friars Road is provided in Table 5.2-15, *Long-Term + Project Arterial Operations*. As shown in this table, the noted segments would operate at LOS D or better in both directions during the AM and PM peak hours under Year 2035 + Project conditions. As a result, because, these segments are built to their ultimate classification and both alternative analysis conditions are met, the associated Year 2035 + Project condition impacts are determined to be less than significant and not cumulatively considerable.

Freeway Segment Conditions. As seen in Table 5.2-16, *Long-Term Freeway Mainline Segment Operations*, the following conclusions are provided for freeway mainline segment operations under the Year 2035 Without Project scenario: (1) the I-5 freeway segment is calculated to operate at LOS F(0) in the northbound direction during the AM and PM peak hours; (2) the I-8 freeway segment is calculated to operate at LOS F(0) in the westbound direction during the AM peak hour, and is calculated to operate at LOS F(0) in the eastbound direction during the PM peak hour; and (3) all other evaluated freeway segments would operate at LOS D or better.

With Project traffic taken into account in the Long-Term Scenario, freeway segment operations would not change considerably as shown in Table 5.2-16 and, therefore, no significant cumulative impacts to freeway mainline segments would occur.

Ramp Meter Conditions. From the data in Table 5.2-17, *Long-Term Ramp Meter Operations*, the following conclusions are provided regarding ramp meter conditions under the Year 2035 Without Project scenario: (1) the northbound on-ramp is calculated to have no delay during the AM and PM peak hours; and (2) the southbound on-ramp is calculated to have 40 minutes of delay during the AM peak hour, and 112 minutes of delay during the PM peak hour. It should be noted that the ramp meter analysis was conducted using the fixed-rate approach, which generally tends to produce exaggerated queue lengths and delays, as previously discussed in Section 5.2.1.

With Project traffic added to the Long-Term Scenario, the northbound on-ramp is calculated to have no delay during the AM and PM peak hours and the southbound on-ramp from Sea World Drive is calculated to have 41 minutes of delay during the AM peak hour and 115 minutes of delay during the PM peak hour. Per City Significance Thresholds, the allowable increase in delay at a ramp meter with more than 15 minutes of delay and freeway LOS E is 2 minutes and at LOS F is 1 minute. Although the delays calculated for the AM and PM peak hours for the southbound on-ramp are considered excessive, a Project-related significant impact is not calculated since the Project adds only one minute of delay during the AM peak hour.

As outlined in the Project TIA, although the delays calculated for the AM and PM peak hours for the southbound on-ramp are considered excessive under City Significance Thresholds, a Project-related significant impact is not calculated since the Project adds only one minute of delay during the AM peak hour. Project-related cumulative impacts would be considered less than significant, based on the fact that the corresponding freeway mainline segment (i.e., I-5 southbound between SeaWorld Drive and I-8) would operate at LOS D with the addition of Project traffic, as shown in Table 5.2-17.

Table 5.2-14
LONG-TERM SEGMENT OPERATIONS

Table 5.2-14 LONG-TERM SEGMENT OPERATIONS										
Street Segment	Functional Classification ¹	LOS E Capacity ²	Year 2035 Without Project			Year 2035 + Project			Δ V/C ⁶	Impact Type
			ADT ³	LOS ⁴	V/C ⁵	ADT	LOS	V/C		
Sea World Drive										
1. Pacific Hwy to I-5 Ramps	5-Lane Major Road	45,000	48,900	F	1.087	49,370	F	1.097	0.010	No
Tecolote Road										
2. I-5 to Morena Blvd	4-Lane Major Road	40,000	33,600	D	0.840	35,000	D	0.875	0.035	No
Morena Boulevard										
3. Tecolote Rd to Buenos Ave	2-Lane Collector w/ TWLTL	15,000	19,500	F	1.300	21,170	F	1.411	0.111	No ⁷
4. Buenos Ave to W. Morena Blvd	2-Lane Collector w/ TWLTL	15,000	17,800	F	1.187	19,470	F	1.298	0.111	No ⁷
5. W. Morena Blvd to Napa St	4-Lane Major Road	40,000	35,600	E	0.890	37,660	E	0.942	0.052	No ⁷
6. Napa St to Linda Vista St	4-Lane Major Road	40,000	27,600	C	0.690	27,628	C	0.691	0.001	No
7. Linda Vista Rd to I-8 Ramps	4-Lane Major Road	40,000	40,400	F	1.010	42,540	F	1.064	0.054	No ⁷
Linda Vista Road										
8. Morena Blvd to Napa St	4-Lane Major Road	40,000	32,200	D	0.805	34,340	D	0.859	0.054	No
9. Napa St to Marian Way/Mildred St	4-Lane Major Road	40,000	28,700	C	0.718	33,160	D	0.829	0.0111	No
10. Marian Way/Mildred St to Colusa St	4-Lane Major Road	40,000	23,100	C	0.578	25,192	C	0.630	0.052	No
11. Colusa St to Alcalá Pkwy	4-Lane Major Road	40,000	20,600	B	0.515	23,110	C	0.578	0.063	No
12. Alcalá Pkwy to Via Las Cumbres	4-Lane Major Road	40,000	22,500	C	0.563	26,220	C	0.656	0.093	No
13. Via Las Cumbres to Kramer St	4-Lane Major Road	40,000	23,600	C	0.590	25,550	C	0.639	0.049	No
14. Kramer St to Comstock St	4-Lane Major Road	40,000	19,800	B	0.495	21,470	C	0.537	0.042	No
15. Comstock St to Ulric St	4-Lane Major Road	40,000	23,200	C	0.580	24,690	C	0.617	0.037	No
16. Ulric St to Genesee Ave	4-Lane Major Road	40,000	31,800	D	0.795	33,100	D	0.828	0.033	No

**Table 5.2-14 (cont.)
LONG-TERM SEGMENT OPERATIONS**

Street Segment	Functional Classification ¹	LOS E Capacity ²	Year 2035 Without Project			Year 2035 + Project			Δ V/C ⁶	Impact Type
			ADT ³	LOS ⁴	V/C ⁵	ADT	LOS	V/C		
Friars Road										
17. Napa St to Colusa St	4-Lane Major Road	40,000	39,500	E	0.988	40,060	F	1.002	0.014	No ⁷
18. Colusa St to Via Las Cumbres	4-Lane Major Road	40,000	42,300	F	1.058	43,140	F	1.079	0.021	No ⁷
19. Via Las Cumbres to Fashion Valley Rd	4-Lane Major Road	40,000	32,500	D	0.813	34,360	D	0.859	0.046	No
20. Fashion Valley Rd to Via de la Moda	6-Lane Major Road	50,000	28,500	C	0.570	29,800	C	0.596	0.026	No
21. Via de la Moda to Avenida de las Tiendas	6-Lane Major Road	50,000	37,200	C	0.744	38,456	C	0.769	0.025	No
22. Avenida de las Tiendas to Avenida del Rio	6-Lane Major Road	55,000	64,800	F	1.178	66,010	F	1.200	0.022	Cumulative
23. Avenida del Rio to SR-163 SB Ramps	7-Lane Major Road /Prime Arterial	60,000	64,800	F	1.080	66,010	F	1.100	0.020	Cumulative
Napa Street										
24. Friars Rd to Linda Vista Rd	4-Lane Major Road	40,000	21,400	C	0.535	21,680	C	0.542	0.007	No
25. Linda Vista Rd to Morena Blvd	4-Lane Major Road	40,000	30,000	C	0.750	32,094	D	0.802	0.051	No
Colusa Street										
26. Friars Rd to Linda Vista Road	2-Lane Collector	8,000	5,100	D	0.638	6,500	D	0.813	0.175	No
Via Las Cumbres										
27. Friars Rd to Linda Vista Rd	4-Lane Collector	30,000	16,300	C	0.543	17,510	C	0.584	0.040	No

Source: LLG 2016

¹ The current classification at which the roadway functions.

² The capacity corresponding to the functional classification of the roadway per City of San Diego classification table.

³ Average daily traffic

⁴ Level of Service

⁵ Volume to capacity ratio

⁶ Increase in V/C ratio due to Project traffic

⁷ Peak hour arterial analysis indicates LOS D or better operations; therefore, no significant impact is calculated.

⁸ Modified Major / Prime capacity assumed. Westbound lanes will operate as a Prime Arterial (no parking or driveways) and eastbound lanes will operate as a Major Road due to Avenida Del Rio Driveway.

Bold and shaded indicates significant impact.

Table 5.2-15 LONG-TERM + PROJECT ARTERIAL OPERATIONS				
Arterial Segment	Period	Direction	Speed ¹	LOS ²
Morena Blvd 3. Tecolote Road to Buenos Avenue	AM	NB	15.5	D
		SB	23.3	C
	PM	NB	14.1	D
		SB	21.2	C
Morena Blvd 4. Buenos Avenue to West Morena Blvd	AM	NB	17.5	D
		SB	15.8	D
	PM	NB	17.5	D
		SB	15.5	D
Morena Blvd 5. West Morena Blvd to Napa Street	AM	NB	23.3	C
		SB	14.4	D
	PM	NB	25.6	B
		SB	15.2	D
Morena Blvd 7. Linda Vista Road to I-8	AM	NB	27.2	B
		SB	32.4	A
	PM	NB	28.0	B
		SB	32.4	A
Friars Road 17. Napa Street to Colusa Street	AM	EB	28.8	B
		WB	16.5	D
	PM	EB	17.8	D
		WB	21.6	C
Friars Road 18. Colusa Street to Via Las Cumbres	AM	EB	31.0	B
		WB	18.2	C
	PM	EB	19.9	D
		WB	19.1	C

Source: LLG 2016

¹ Speed in miles per hour

² Level of Service

Table 5.2-16
LONG-TERM FREEWAY MAINLINE SEGMENT OPERATIONS

Freeway and Segment	Direction, Number of Lanes & Capacity ¹			Year 2035 Without Project						Year 2035 + Project						Delta ³		Significant Impact?	
				Peak Hour Volume		V/C ²		LOS		Peak Hour Volume		V/C		LOS					
				AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
Interstate 5																			
Sea World Dr to I-8	NB	4M + 1A	9,200	9,874	10,219	1.073	1.111	F(0)	F(0)	9,899	10,234	1.076	1.112	F(0)	F(0)	0.003	0.002	No	No
	SB	4M + 2A	10,400	8,873	8,793	0.853	0.845	D	D	8,876	8,815	0.853	0.848	D	D	0.000	0.002	No	No
Interstate 8																			
Morena Blvd to Taylor St	WB	5M	10,000	11,559	6,997	1.156	0.700	F(0)	C	11,589	7,015	1.159	0.701	F(0)	C	0.003	0.002	No	No
	EB	4M + 1A	9,200	5,925	11,087	0.644	1.205	C	F(0)	5,928	11,114	0.644	1.208	C	F(0)	0.000	0.003	No	No

Source: LLG 2016

¹ Capacity = 2,000 vehicles per hour per lane (mainline), 1,200 vehicles per hour per lane (auxiliary).

² Volume to Capacity ratio

³ Increase in V/C ratio due to Project traffic

M = Mainline, A = Auxiliary Lane

Table 5.2-17 LONG-TERM RAMP METER OPERATIONS						
Location/Condition	Peak Hour	Peak Hour Flow ¹	Discharge Rate ²	Excess Demand ¹	Delay ³	Queue ⁴
Sea World Drive to NB I-5 – 2 SOV Lanes						
Year 2035	AM	821	965	0	0	0
	PM	919	972	0	0	0
Year 2035 + Project	AM	825	965	0	0	0
	PM	953	972	0	0	0
Sea World Drive to SB I-5 – 1 SOV + 1 HOV Lanes						
Year 2035	AM	530 ⁵	318	212	40	5,310
	PM	910 ⁵	318	592	112	14,809
Year 2035 + Project	AM	533 ⁵	318	215	41	5,374
	PM	929 ⁵	318	611	115	15,276

Source: LLG 2016

¹ Vehicles per hour per lane.

² Ramp meter discharge rates obtained from Caltrans. Most restrictive rate used when a range of discharge rates are provided.

³ Calculated delay in minutes per lane.

⁴ Calculated queue length in feet per lane.

⁵ 15 percent reduction in volume due to HOV lane.

SOV = Single Occupancy Vehicle, HOV = High Occupancy Vehicle, NB = northbound, SB = southbound.

Significance of Impact

Based on the City significance criteria contained in Table 5.2-5 and the analysis methodologies described in this evaluation (and discussed in more detail in the Project TIA), the Project would result in significant direct and cumulative impacts at the study area locations outlined below.

Direct Impacts (Near-Term + Project)

Significant, direct impacts would occur at the following three intersections and one roadway segment; no significant impacts to freeway mainlines or ramp meters would occur.

Intersections

- Intersection No. 9: Linda Vista Road/Napa Street
- Intersection No. 11: Linda Vista Road/Colusa Street
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance

Roadway Segments

- Segment No. 9: Linda Vista Road; Napa Street to Marian Way/Mildred Street

Freeway Segments

No significant direct impacts to freeway segments would result from the proposed Project.

Freeway Ramp Meters

No significant direct impacts to freeway ramp meters would result from the proposed Project.

Cumulative Impacts (Year 2035 + Project)

Significant, cumulative impacts would occur at the following four intersections and one roadway segment; no significant impacts to freeway mainlines or ramp meters would occur.

Intersections

- Intersection No. 9: Linda Vista Road/Napa Street
- Intersection No. 11: Linda Vista Road/Colusa Way
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance

Roadway Segments

- Segment Nos. 22 and 23: Friars Road; Avenida de las Tiendas to SR 163 SB Ramps

Freeway Segments

No significant cumulative impacts to freeway segments would result from the proposed Project.

Freeway Ramp Meters

No significant cumulative impacts to freeway ramp meters would result from the proposed Project.

Mitigation, Monitoring, and Reporting

Direct Impacts

The intersection of Linda Vista Road/Napa Street, as well as the segment of Linda Vista Road between Napa Street and Marian Way (Mildred Street), are located within the Morena Corridor Specific Plan area, which will likely experience substantial mobility related improvements in the coming years. Because planning for improvements is still in the preliminary stages, however, multiple improvement options at the noted intersection and street segment are under consideration by the City and none of the potential options are definitive at this time (nor is the funding for any improvements assured). As a result, the identified direct impacts to the Linda Vista Road/Napa Street intersection and the segment of Linda Vista Road between Napa Street and Marian Way (Mildred Street) are considered significant and unmitigated, although the Project applicant will financially participate on a “fair share” basis towards future improvements to the area as outlined below in the associated mitigation measures (Tra-2 and Tra-5).

The Project’s contribution amount outlined in Tra-5 is based on the Project’s estimated fair share of the total cost of the “East Morena Roadway Extension Project” presented in the *Morena Boulevard Station Area Planning Study*. The study proposes a new extension of Morena Boulevard from Cushman Avenue to Linda Vista Road, which would bypass the intersection of Linda Vista Road/Napa Street, thus alleviating a portion of the traffic travelling through the intersection, and providing

a more direct route to the freeway. The improvement would only partially mitigate the Project's impact because the scope of the improvement is undefined and the balance of the cost for the future, undefined, improvement is unfunded and not assured. The total cost of the improvement project was estimated at approximately \$4,500,000 in the *Morena Boulevard Station Area Planning Study*. Additional information on the improvement project is provided in the Project's TIA (Appendix C).

Direct impacts to other locations in the Project area would be mitigated to a less than significant level by improvements outlined in the measures listed below.

Intersections

As explained above, Project impacts are based on projected increases in student FTE. Although the TIA's ADT values are based on FTE projections, it is unknown whether an increase in FTE would actually create the ADT increase that is assumed in the TIA. The following measure shall be implemented by USD to verify that the timing of mitigation implementation corresponds with projected impacts:

Tra-1 Traffic Monitoring Program

Prior to the implementation of mitigation measure Tra-4 and upon enrollment of 7,500 FTE and each increase of 500 additional FTE, USD shall conduct a traffic mitigation monitoring program to monitor current conditions at the impacted intersection and confirm that the traffic signal warrants and LOS operations that serve as the basis for the mitigation measure are met based on the traffic volumes present at that time. The following monitoring steps shall be taken by USD to comply with this measure:

- a. USD shall submit annual FTE numbers to the City within 6 months of the beginning of the Fall semester following approval of the Master Plan Update. Applicable increases in FTE, as summarized in b) and/or d) below, will trigger the need to conduct a mitigation monitoring study reviewing the conditions at the subject intersection.
- b. Upon reaching an annual enrollment of 7,500 FTE and upon each subsequent increase of 500 FTE, USD shall submit a mitigation monitoring study for the Linda Vista Road/Alcalá Vista Apartments Entrance intersection at 7,500 FTE (as described in Table 12-3 of the Project's TIA study). As summarized in Table 12-3 of the Project's TIA study, the significant impact at the Linda Vista Road/ Alcalá Vista Apartments Entrance is expected with the addition of 500 FTE.
- c. ~~Once an applicable increase in FTE triggers the need to conduct an mitigation monitoring study, The mitigation monitoring study requires that~~ USD shall conduct AM and PM peak hour intersection counts at the subject intersection. The counts shall be done for one day on a Tuesday, Wednesday, or Thursday when school is in session during the Fall semester.
 - i. Two analyses shall be conducted in the mitigation monitoring study. The subject intersection shall be analyzed to determine if a significant impact is caused by USD traffic based on the City LOS criteria. The LOS and delay calculated under "Near-Term without Project" conditions in the Project's TIA study will serve as the baseline for

comparing LOS and delay in the mitigation monitoring study. A peak hour traffic signal warrant shall also be conducted using the peak hour traffic counts.

- ii. If the mitigation monitoring analysis determines that USD traffic causes a significant impact and if the peak hour signal warrant shows that the warrant is met, USD shall be responsible for implementing the intersection mitigation measure of signaling the intersection as noted in Tra-4, which includes providing a dedicated southbound left turn lane and a dedicated southbound right turn lane, and coordinating the signal with the downstream signal at the Linda Vista Road/Via las Cumbres intersection to the east.
 - iii. If the mitigation monitoring analysis identifies a significant impact, but signal warrants are not met, an alternative mitigation measure restricting left-turns out of the Alcalá Vista Apartments Entrance by constructing a raised median within Linda Vista Road shall be implemented.
 - iv. The mitigation monitoring study, including the intersection and signal warrant analyses, must be completed and turned into the City's Transportation Development Section each year a study is needed.
- d. If implementation of the mitigation measure is not found to be necessary under the FTE increases outlined in b) above, USD shall be responsible for monitoring the conditions at the intersection(s) with each subsequent increase of 500 FTE (500 FTE, 1,000 FTE, 1,500 FTE, etc.).
 - e. USD shall be responsible for monitoring the intersection until the need for one of the mitigation measures is triggered, or when the FTE increase reaches 3,000 FTE.

Tra-2 Linda Vista Road/Napa Street

Upon enrollment of 7,350 FTE, USD shall make the first payment of a ~~Payment of~~ "fair-share" contribution of \$297,000 (to be paid in equal payments over a period of five years) toward future improvements to the Morena Corridor Specific Plan area (including the Linda Vista Road/Napa Street intersection), as specified in detail under Tra-5, would partially mitigate the Project's contribution to this impact. Impacts would still be considered significant and unmitigable because the balance of the cost for the future, undefined, improvements is unfunded and not assured.

Tra-3 Linda Vista Road/Colusa Street

The Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Colusa Street intersection, to the satisfaction of the City Engineer.

To improve overall intersection operations, it is also recommended, but not required, to eliminate six parking spaces along the east curb of Colusa Street to provide a dedicated 150-foot northbound left-turn lane and a dedicated northbound right-turn lane at Linda Vista Road. The provision of the dedicated northbound right-turn and left-turn lanes is not required to mitigate the significant impact.

Tra-4 Linda Vista Road/Alcalá Vista Apartments Entrance

Prior to enrolling 7,500 FTE students, one of two mitigation options shall be implemented once warranted by the mitigation monitoring program outlined in Tra-1.

Option 1: If the monitoring program identifies a significant impact and if the peak hour signal warrant shows that the warrant is met, the Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Alcalá Vista Apartments Entrance intersection, provide a dedicated southbound left turn lane and dedicated southbound right turn lane, and coordinate the signal with the downstream signal at Via las Cumbres to the east, to the satisfaction of the City Engineer.

Option 2: If the monitoring program identifies a significant impact, but signal warrants are not met, the Project applicant shall assure by permit and bond an alternative measure restricting left-turns out of the Alcalá Apartments Entrance by constructing a raised median within Linda Vista Road. Left-turns in would continue to be allowed.

Roadway Segments

Tra-5 Linda Vista Road: Napa Street to Marian Way (Mildred Street)

The following measure is required to partially mitigate the Project's direct significant impact to the subject roadway segment, with the impact still considered significant and unmitigable because the balance of the cost for the future, undefined, improvements is unfunded and not assured.

- Prior to enrolling 7,350 FTE students, the Project applicant shall be required to provide a "fair share" contribution of \$297,000 (to be made in five equal payments over five years) towards future improvements to the Morena Corridor Specific Plan area (including the segment of Linda Vista Road between Napa Street and Marian Way [Mildred Street]), to the satisfaction of the City Engineer.

Freeway Segments

No mitigation measures would be required.

Freeway Ramp Meters

No mitigation measures would be required.

Cumulative Impacts

Intersections

The following measures are required to partially mitigate the Project's cumulatively significant impacts to intersections:

Tra-6 Linda Vista Road/Napa Street

Implementation of Tra-2, as outlined above under Direct Impacts, would partially mitigate the Project's proportionate share of the cumulative impacts; however, the identified cumulative impact to the Linda Vista Road/Napa Street intersection is considered cumulatively significant and unmitigated because the balance of the cost of the future, undefined, improvements is unfunded and not assured (as outlined above under the discussion of *Direct Impacts*).

Tra-7 Linda Vista Road/Colusa Street

Implementation of Mitigation Measure Tra-3, as outlined above under *Direct Impacts*, would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Colusa Street intersection.

Tra-8 Linda Vista Road/Alcalá Vista Apartments Entrance

Implementation of Mitigation Measure Tra-1 and Tra-4, as outlined above under *Direct Impacts*, would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Alcalá Vista Apartments Entrance intersection.

Roadway Segments

The Long-Term (2035) scenario assumes the fully funded Phase I of the SR 163 / Friars Road Interchange Project, which includes improvements to the segment of Friars Road from Avenida de las Tiendas to Ulric Street/SR 163 SB Ramps. The timing and scope of Phases II and III of the Interchange Project are yet to be determined, contingent on funding, and will likely not include further improvements to this segment. Since there are no improvement projects towards which the Project can contribute a fair share payment, this impact is considered cumulatively significant and unmitigated in the Long-Term condition.

Freeway Segments

No mitigation measures would be required.

Freeway Ramp Meters

No mitigation measures would be required.

5.2.3 Impact

Issue 4: Would the proposal conflict with adopted policies, plans, or programs supporting alternative transportation models?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), transportation impacts may be significant if the Project would:

- Conflict with adopted policies, plans, or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks).

Impact Analysis

Previously Disclosed Transportation/Circulation Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR did not address the issue of potential project impacts related to conflicts with adopted policies, plans, or programs supporting alternative transportation modes.

Impacts from the Master Plan Update

Alternative Transportation Modes

As described above in Section 5.2.1 under Existing Alternative Transportation System, an extensive network of on- and off-campus alternative transportation facilities and programs is currently in place in the USD vicinity, including bicycle, transit, and pedestrian systems. While the proposed Project would generate additional vehicle trips in the campus vicinity as previously described, it would also include a number of programs and improvements to expand the local alternative transportation network and encourage USD students and staff to increase their use of alternative transportation options. Specifically, these include the following efforts, with additional detail provided in the Project TIA.

Bicycle Network.

- Shift vehicular and bicycle circulation to the periphery of campus, with expansion and improvement of the campus roadway to accommodate multiple modes of circulation.
- Create safe conditions for bicycle and vehicular traffic on the proposed loop road, by providing bike lanes, where feasible and as shown in Section 4.4 of the Master Plan Update (Appendix B).
- Place bicycle parking areas near the proposed loop road, to decrease the amount of bike traffic throughout the center of campus and allow students to park near the main route and walk to class.
- Utilize the required fire lane routes as day-to-day bike slow zones, thereby allowing the campus to meet its requirement for fire access.
- Restripe existing on-campus private roads such that the proposed Loop Road bike lanes can be connected to the residential areas of campus. While there is not adequate space for a dedicated bike lane along residential roads, slowing traffic and including signage and sharrow striping would allow for a more complete bicycle network on campus.
- Implement bike sharing as feasible to allow more student access to bikes, as well as to promote a more active campus lifestyle. Four bike-share locations are proposed to allow resident students and visitors immediate access to the system.
- Locate bike racks in convenient locations throughout the campus, including the potential dedication of larger bike corrals at the residential areas of campus.

Transit Services.

- Consider expanding future tram service to meet student demand, including adding new tram stops to accommodate future growth and improve convenience.
- Provide enhanced tram signage at all existing and proposed tram stops.
- Consider new smart phone apps that can provide up-to-the-minute information on tram location.
- Incorporate shelters or tram stops to provide seating for all users, as well as covered space for wheelchairs and strollers.

Pedestrian Facilities.

- Establish the academic core as a Pedestrian Priority Zone to make the pedestrian experience safer and more pleasant.
- Designate Marian Way and Torero Way (from Copley Library to the Student Life Pavilion) as a Pedestrian Zone (i.e., limit non-emergency vehicular traffic and bicycle traffic).
- Shift vehicular and bicycle circulation to the periphery of campus.
- Manage congestion and access points with clearly marked crossings, enhanced paving, and building design that acknowledge these areas as significant gateways and activity nodes on campus.
- Provide trails, paths, stairs, and connecting walkways along the edges of campus.
- Enhance the following three cross-axial pedestrian connections that anchor the campus to its edges and context:
 - College Connection: from the Shiley Center for Science and Technology to the Facilities Management complex, framed by new buildings for the College of Arts and Sciences and School of Business Administration.
 - Open Space Connection: from the Josephine Street site to The Immaculata and a canyon overlook, crossing a new Academic Quad at the center of campus.
 - Student Life Connection: from the University Terrace Apartments to a new Academic and Student Support Space, the Colachis Plaza and the Student Life Pavilion.
- Connect the residential village at the Mission with the Student Life Pavilion and Hahn University Center through a new Wellness and Recreation Center that bridges across the topography and links academic, recreation, and student life in one building complex.
- Construct a pedestrian bridge and pedestrian connection over Marian Way to connect the West Campus parking garage to the upper mesa of campus (refer to Project Site No. 19 described in Section 3.0, *Project Description*).

Transportation Demand Management. The proposed Master Plan Update also would entail the development of a Transportation Demand Management (TDM) Plan to supplement existing TDM efforts outlined above under *Existing Conditions* and further reduce the number of vehicle trips to and from campus, including the following measures:

- Increase faculty/staff use of alternatives to driving alone to reduce commuter parking demand, by (for example) incorporating special parking areas for ride and car sharing programs.
- Improve the efficiency of existing parking with expanded enforcement, shuttle improvements, and the use of technology to direct drivers to available spaces.
- Educate students, faculty, and staff about the full menu of transit options, through efforts such as distributing educational materials, providing transit tours, and providing additional transit information on the USD website.
- Improve bicycle and pedestrian experiences, as described above under Alternative Transportation Modes.
- Expand existing ~~Zip Car~~ car sharing services and/or provide free memberships to alternative car sharing services, if available.
- Provide free or more highly discounted (i.e., above current discounts) transit passes to commuter students, faculty, and staff willing to forgo a parking permit.
- Retool the campus parking system to establish fees based on daily use.
- Consider implementing technology in parking structures to assist students in quickly locating available parking spaces (parking space vacancy monitoring).

The TDM strategies listed above may reduce the number of vehicular trips generated by the campus, although the results of this study, including the LOS analysis at the study area roadway facilities, do not take into account a TDM-related reduction in traffic. While a TDM credit was not assumed in the calculation of Project trips or the corresponding impact analysis and is not required as mitigation for project impacts discussed above under Issue 3, USD has agreed to internally monitor the effectiveness of their TDM strategies. The results of the USD TDM monitoring efforts would be forwarded annually to the City Engineer for a period of seven years beginning one year after approval of the Conditional Use Permit (CUP).

Consistency with Adopted Alternative Transportation Mode Plans and Policies

The proposed Project would not adversely affect alternative transportation modes or safety. The provision of additional bicycle, transit, pedestrian, and TDM facilities/programs to enhance and expand connections with existing facilities would be consistent with adopted plans supporting alternative transportation modes. Specifically, the Project would be consistent with the City's General Plan Mobility Element goal of supporting multi-modal transportation, as well as Urban Design Element goals to integrate transit facilities into project design, and design or retrofit streets

to improve walkability, bicycling, and transit integration. Refer to Section 5.1, *Land Use*, and Table 5.1-1 for details on plan consistency.

Significance of Impact

The Project would enhance existing bicycle, transit, and pedestrian transportation modes on campus, as well as expanding current TDM efforts. As a result, the Project would be consistent with the City's alternative transportation policies and no impacts would occur.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.2.4 Impact

Issue 5: Would the proposal result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), transportation impacts may be significant if the Project would:

- Result in a substantial restriction in access to publicly or privately owned land, the impact would be significant.

Impact Analysis

Previously Disclosed Transportation/Circulation Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR did not address the issue of potential project impacts related to substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas.

Impacts from the Master Plan Update

The Master Plan Update would provide trails, paths, stairs, and connecting walkways along the edges of campus and create a trail system along the edge of Tecolote Canyon (improving and expanding existing pedestrian walks) to better connect the Valley to the Mesa areas of campus. Although no new trails into the canyon are proposed, the campus may add a trail kiosk and benches to the existing trail into Tecolote Canyon during the implementation of the Master Plan Update. As such, access to Tecolote Canyon is not expected to be restricted, but would be enhanced upon implementation of the Master Plan Update.

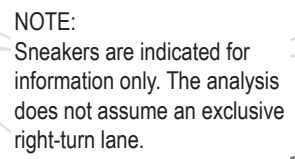
Significance of Impact

The Project would enhance access to Tecolote Canyon and would not restrict public access; no impacts related to substantial alterations to circulation movements or access to open space areas would occur.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

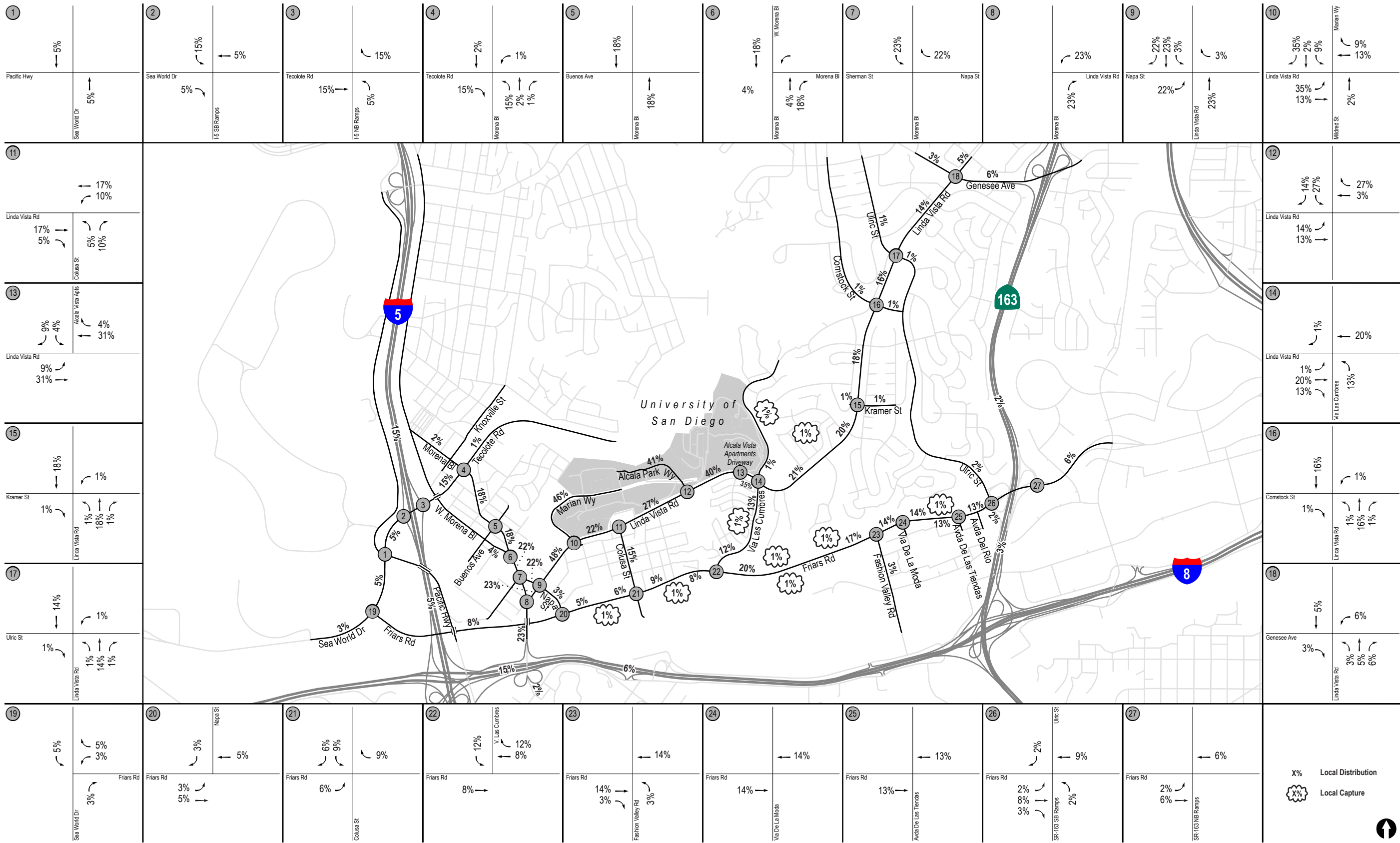
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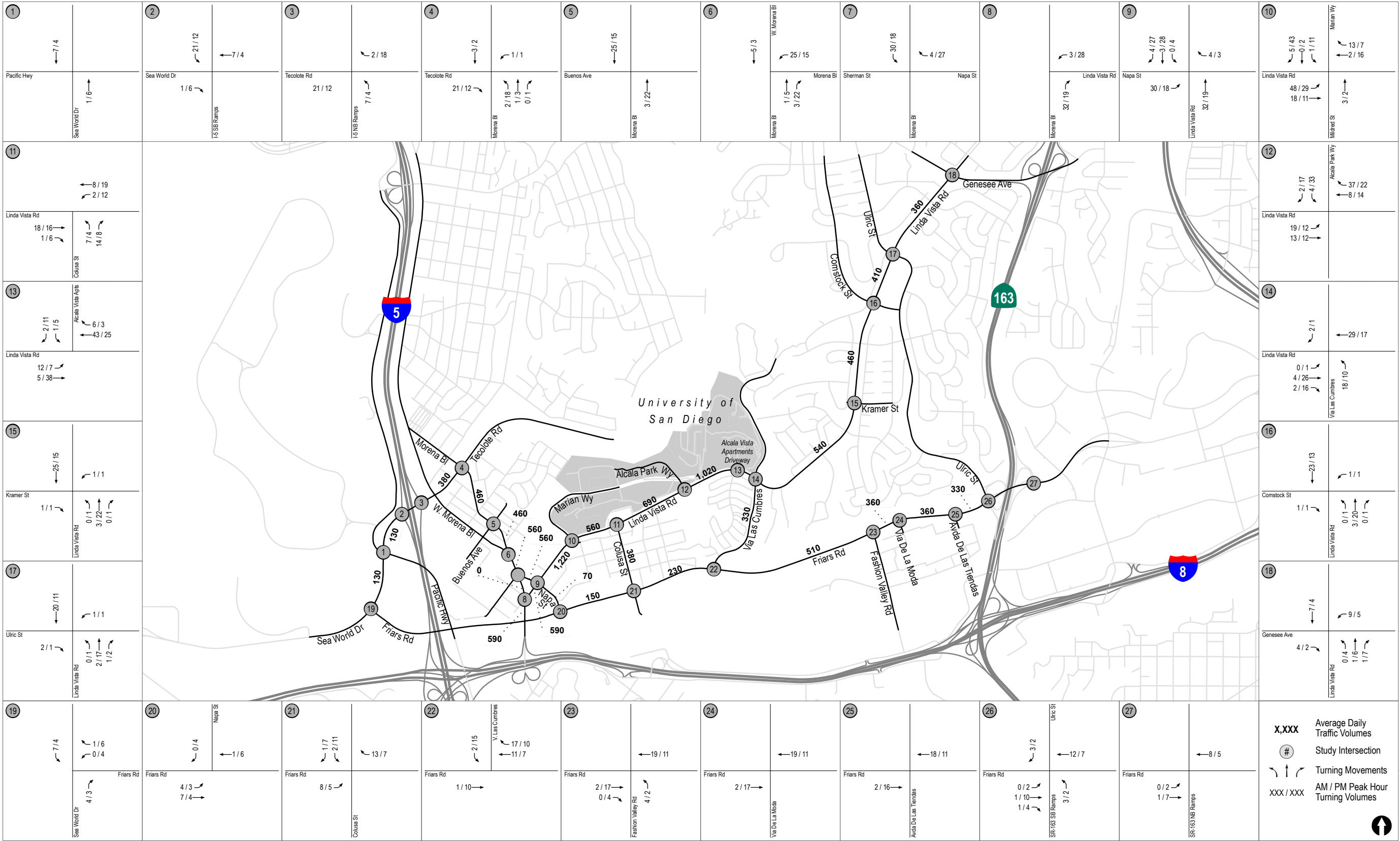
Figure 5.2-1

Source: LLG 2016



Project Trip Distribution
UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE
Figure 5.2-2

Source: LLG 2016



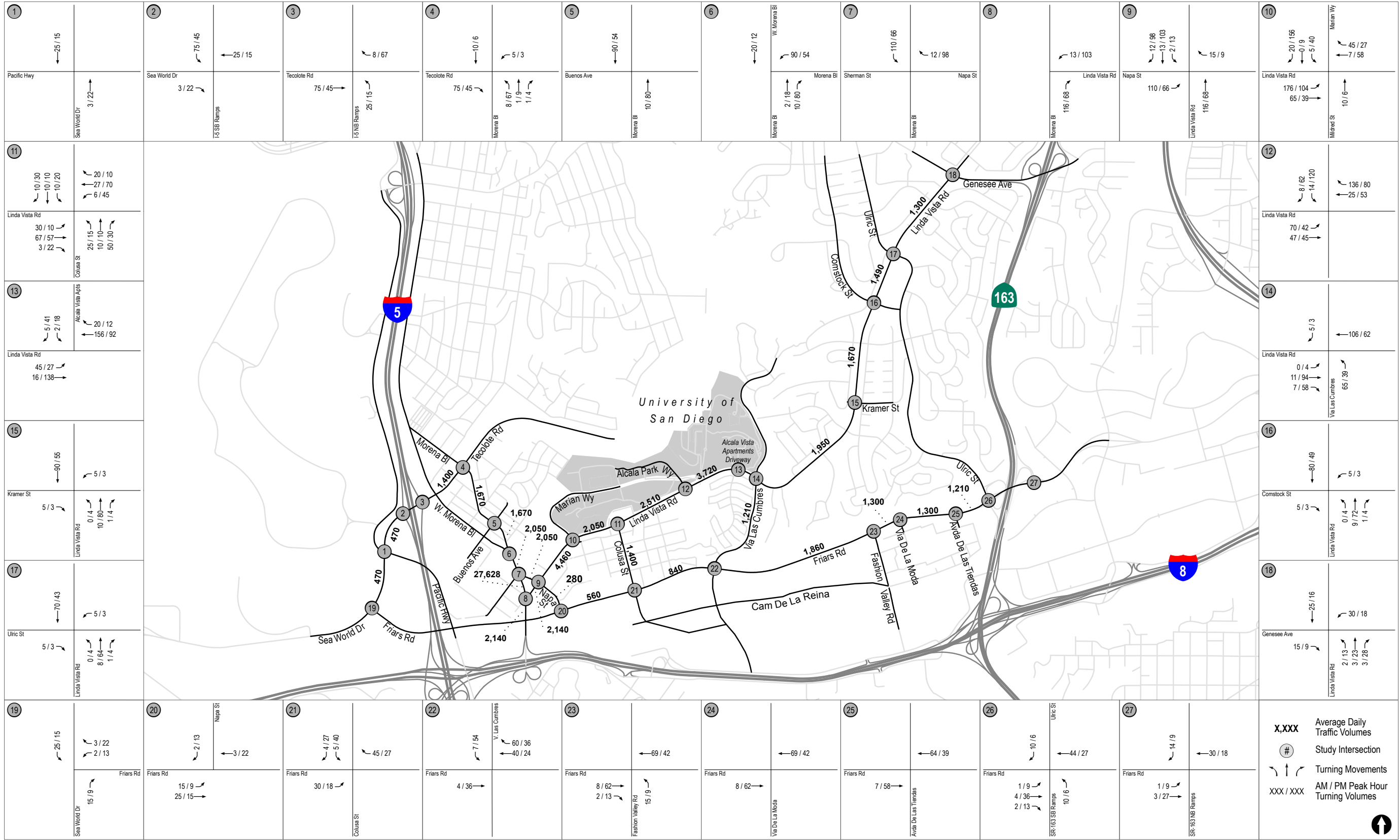
Near-Term Project Traffic Volumes

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.2-3

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Source: LLG 2016

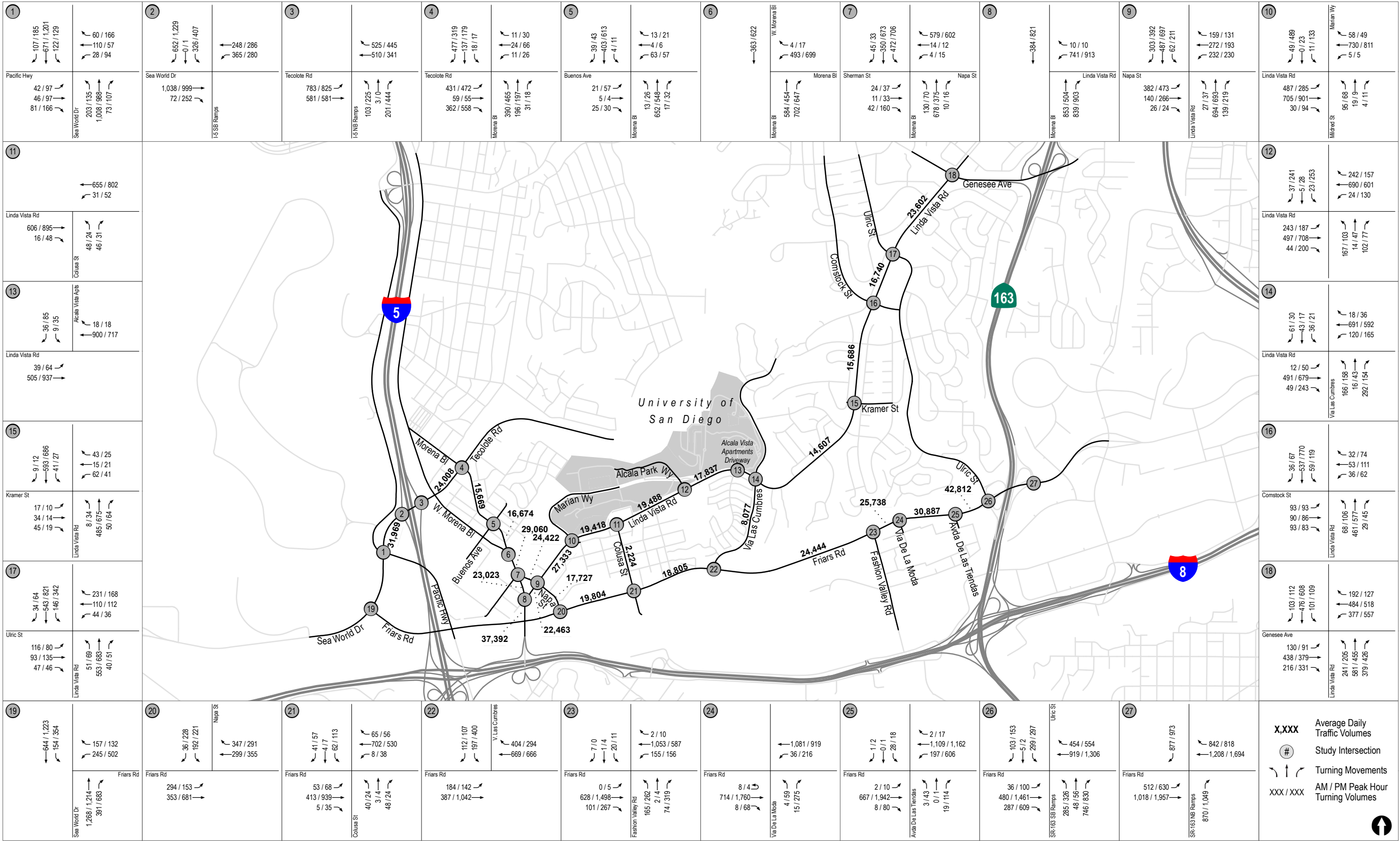


Long-Term Project Traffic Volumes

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Figure 5.2-4

Source: LLG 2016

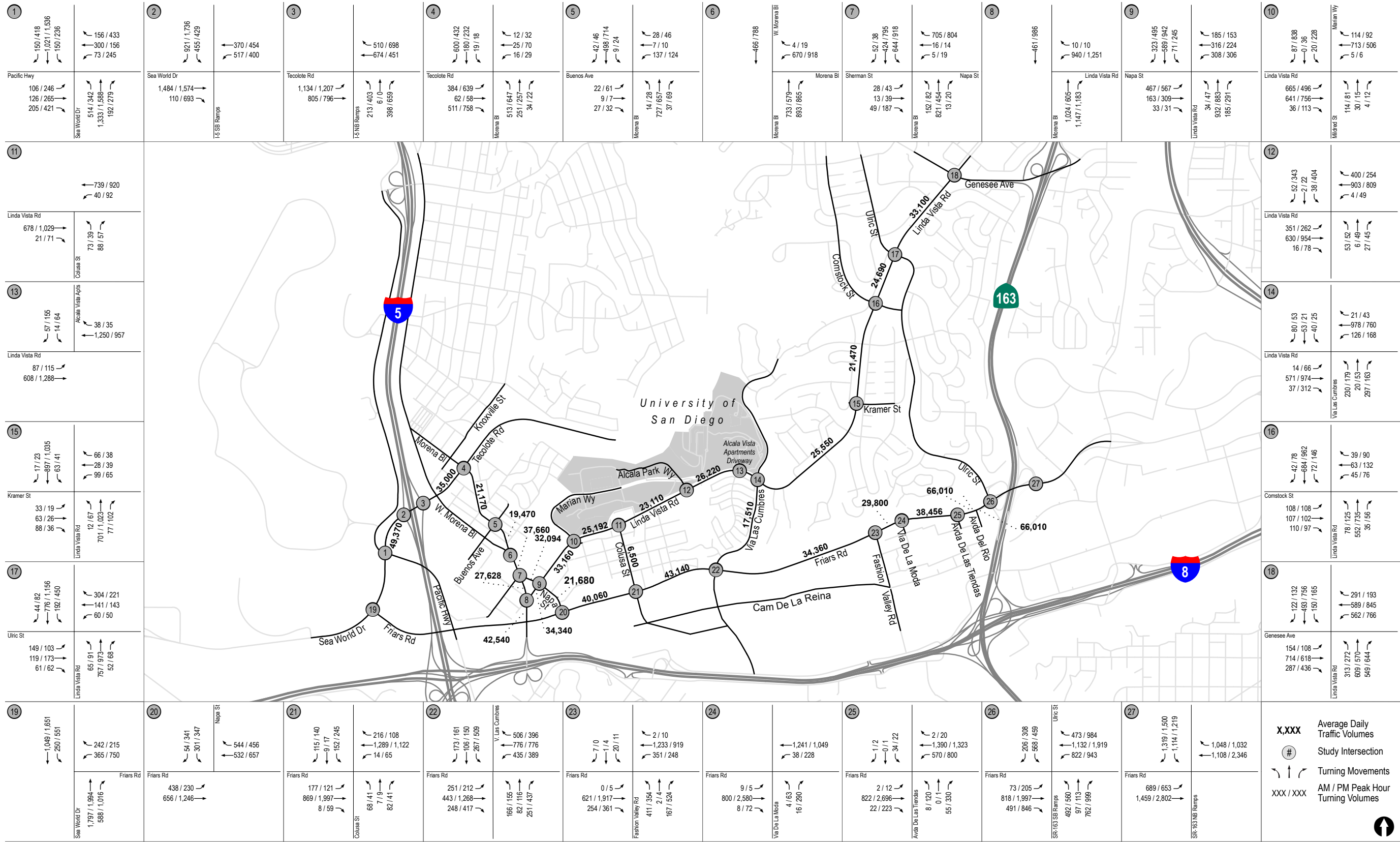


Near-Term + Project Traffic Volumes

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Figure 5.2-5

Source: LLG 2016



Year 2035 + Project Traffic Volumes

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Figure 5.2-6

5.3 Biological Resources

This section of the Subsequent Environmental Impact Report (SEIR) is based on a number of biological surveys and related investigations including the Biological Technical Report for the USD Master Plan Update and Conditional Use Permit (CUP) Amendment (HELIX 2016a; Appendix D), Biological Memorandum for the USD Master Plan Update (HELIX 2017; Appendix N), and the Biological Resources Report for the USD Master Plan EIR (Lettieri-McIntyre and Associates 1996).

5.3.1 Existing Conditions

Vegetation Communities/Land Cover Types

Thirteen vegetation communities and one land cover type (developed) encompassing a total of approximately 180 acres are present within the Master Plan Update area (Figure 5.3-1, *Vegetation and Sensitive Resources/Impacts* and Table 5.3-1, *Existing Acreages of Vegetation Communities/Land Cover Types Within the Master Plan Update Area*). Of the 180 acres, 7.6 acres fall within the Multi-habitat Planning Area (MHPA), which is the City's Multiple Species Conservation Plan (MSCP) Preserve.

Table 5.3-1 EXISTING ACREAGES OF VEGETATION COMMUNITIES/ LAND COVER TYPES WITHIN THE MASTER PLAN UPDATE AREA		
Vegetation Community/ Land Cover Type ¹	Acres ²	Acres ² in the MHPA ³
Wetland/Riparian⁴		
Southern willow scrub (63320)	0.21	--
Southern willow scrub-disturbed (63320)	0.20	0.20
Arundo dominated riparian (65100)	0.12	--
Upland		
Tier I		
Maritime succulent scrub (32400)	3.2	--
Maritime succulent scrub-disturbed (32400)	<0.1 (0.03)	--
Tier II		
Diegan coastal sage scrub (32500)	8.4	1.2
Diegan coastal sage scrub-disturbed (32500)	<0.1 (0.04)	--
Baccharis scrub (32530)	0.1	--
Tier IIIA		
Southern mixed chaparral (37121)	3.6	3.1
Tier IIIB		
Non-native grassland (42200)	1.6	0.2

Table 5.3-1 (cont.) EXISTING ACREAGES OF VEGETATION COMMUNITIES/ LAND COVER TYPES WITHIN THE MASTER PLAN UPDATE AREA		
Vegetation Community/ Land Cover Type ¹	Acres ²	Acres ² in the MHPA ³
Upland (cont.)		
Tier IV		
Eucalyptus woodland (79100)	3.8	0.6
Disturbed land (11300)	5.9	0.2
Non-native vegetation (11000)	4.8	1.4
Developed (12000) ⁵	145.9	0.7
TOTAL	180.0	7.6

Source: HELIX 2016a.

¹ Vegetation community codes are from Oberbauer et al. 2008 except disturbed land, which is from the City's Biology Guidelines (City 2012).

² Wetland/riparian community acreages rounded to the nearest 0.01 acre; upland community acreages rounded to the nearest 0.1 acre. Total acreage reflects rounding.

³ MHPA = Multi-habitat Planning Area, which is the City's Multiple Species Conservation Program (MSCP) Preserve.

⁴ Wetland/riparian communities are not assigned to a tier (City 2012).

⁵ Technically not a Tier IV community but included therein for simplicity.

The following sections describe each vegetation community and land cover type within the Master Plan Update area and summarize the dominant plant species composition. The acreages of these communities within the Master Plan Update area are provided along with the upland habitat tiers (City 2012), where applicable.

Upland vegetation communities are divided into five tiers of sensitivity (the first includes the most sensitive, the fifth the least sensitive) based on rarity and ecological importance (City 2012). Tier I includes rare uplands. Tier II includes uncommon uplands. Tiers IIIA and IIIB include common uplands. Tier IV includes other uplands. Wetland/riparian communities are not assigned a tier.

Wetland/Riparian Communities

Southern Willow Scrub (including –disturbed)

Southern willow scrub generally consists of dense, broadleaved, winter-deciduous stands of trees dominated by shrubby willows (*Salix* spp.) in association with mule fat (*Baccharis salicifolia*) and, if the riparian system is large enough, with scattered emergent cottonwood (*Populus fremontii*) and western sycamores. Within the d Master Plan Update area, this vegetation community appears as a single layer; it lacks separate shrub and tree layers and generally appears as a mass of short trees or large shrubs.

Three patches of southern willow scrub (a total of 0.21 acre) occur within the Master Plan Update area. Two patches occur near Linda Vista Road in a drainage that likely receives urban runoff from the campus. These patches are dominated by arroyo willow (*Salix lasiolepis*). Another 0.2-acre patch of southern willow scrub–disturbed is in the northeastern corner of the Master Plan Update area. This patch consists of a mix of arroyo willow and Brazilian pepper tree (*Schinus terebinthifolius*).

Arundo Dominated Riparian

Arundo-dominated riparian is a thicket of dense vegetation composed almost exclusively of invasive, non-native giant reed (*Arundo donax*). This community usually occurs in loose, sandy, or fine gravelly alluvium along the major rivers of coastal southern California; however, a single patch of this non-native community (0.12 acre) occurs in a small drainage in the western portion of the Master Plan Update area west of Marian Way.

Upland Communities

Maritime Succulent Scrub (including –disturbed)

Maritime succulent scrub is a low-growing, open scrub community that is dominated by a mixture of stem and leaf succulent species and drought deciduous species that also occur within sage scrub communities. This vegetation community occurs on thin, rocky, or sandy soils on steep slopes of coastal headlands and bluffs. Maritime succulent scrub is restricted to within a few miles of the coast from about Torrey Pines to Baja California, Mexico and on San Clemente and Catalina islands. The dominant species typically found within this vegetation community include San Diego barrel cactus (*Ferocactus viridescens*), velvet cactus (*Bergerocactus emoryi*), coastal prickly pear (*Opuntia littoralis*), cliff spurge (*Euphorbia misera*), dudleya (*Dudleya* spp.), California box-thorn (*Lycium californicum*), and California encelia (*Encelia californica*; Beauchamp 1986).

Maritime succulent scrub within the Master Plan Update area (3.2 acres) is co-dominated by jojoba (*Simmondsia chinensis*), California buckwheat (*Eriogonum fasciculatum*), and California sagebrush (*Artemisia californica*) with a variety of succulents including coastal prickly pear, San Diego barrel cactus, ladies-fingers (*Dudleya edulis*), and coastal cholla (*Cylindropuntia prolifera*). Maritime succulent scrub is located in the western portion of the Master Plan Update area, east of Marian Way. Maritime succulent scrub is a Tier I (rare upland) community (City 2012).

Maritime succulent scrub-disturbed contains many of the same shrub species as the undisturbed community but is sparser and has a higher proportion of non-native, annual plant species. A small patch of maritime succulent scrub-disturbed (0.03 acre) is located in the western portion of the Master Plan Update area northeast of the intersection of Linda Vista Road and Colusa Street. Maritime succulent scrub-disturbed is a Tier I (rare upland) community (City 2012).

Diegan Coastal Sage Scrub (including –disturbed)

Coastal sage scrub is one of the two major shrub types that occur in southern California, occupying xeric sites characterized by shallow soils (the other is chaparral). Four distinct coastal sage scrub geographical associations (northern, central, Venturan, and Diegan) are recognized along the California coast. Diegan coastal sage scrub may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within the Diegan association include California sagebrush, California buckwheat, laurel sumac (*Malosma laurina*), and black sage (*Salvia mellifera*).

Diegan coastal sage scrub (8.4 acres) occurs in scattered locations throughout the undeveloped portions of the Master Plan Update area. It is generally dominated by California buckwheat,

California sagebrush, and large, evergreen shrubs such as laurel sumac and lemonadeberry (*Rhus integrifolia*). Diegan coastal sage scrub is a Tier II (uncommon upland) community (City 2012).

Diegan coastal sage scrub-disturbed contains many of the same shrub species as the undisturbed community but is sparser and has a higher proportion of non-native, annual plant species. A small patch of Diegan coastal sage scrub-disturbed (0.04 acre) is located in the western portion of the Master Plan Update area (immediately east of Arundo dominated riparian). Diegan coastal sage scrub-disturbed is a Tier II (uncommon upland) community (City 2012).

Baccharis Scrub

Baccharis scrub is similar to Diegan coastal sage scrub but dominated by *Baccharis* species (*Baccharis sarothroides* and/or *B. pilularis*). It often occurs within Diegan coastal sage scrub on disturbed sites and areas with nutrient-poor soils and on upper terraces of streams and in detention basins where it includes goldenbush (*Isocoma* spp.). Baccharis scrub (0.1 acre) is confined to a small mesa in the western part of the Master Plan Update area. The vegetation is dominated by an open cover of broom baccharis (*B. sarothroides*) with a poorly developed herbaceous layer. Baccharis scrub is considered a Tier II (uncommon upland) community (City 2012) due to its similarity to Diegan coastal sage scrub and its position in the Master Plan Update area directly adjacent to Diegan coastal sage scrub.

Southern Mixed Chaparral

Southern mixed chaparral is composed of broad-leaved sclerophyllous shrubs that can reach 6 to 10 feet in height and form dense, often nearly impenetrable stands with poorly developed understories. In this mixed chaparral, the shrubs are generally deep rooted with a well-developed soil litter layer, high canopy coverage, low light levels within the canopy, and lower soil temperatures (Keeley and Keeley 1988). This vegetation community occurs on dry, rocky, often steep north-facing slopes with little soil. As conditions become more mesic, broad-leaved sclerophyllous shrubs that resprout from underground root crowns become dominant.

Southern mixed chaparral (3.6 acres) occurs within the Master Plan Update area on the steep north-facing slopes overlooking Tecolote Canyon. Typical species in this community include toyon (*Heteromeles arbutifolia*), lemonadeberry, and poison-oak (*Toxicodendron diversilobum*). Southern mixed chaparral is a Tier IIIA (common upland) community (City 2012).

Non-native Grassland

Non-native grassland is a dense to sparse cover of annual grasses sometimes associated with species of showy-flowered, native, annual forbs. This association often occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include oats (*Avena* spp.), red brome (*Bromus madritensis* ssp. *rubens*), common ripgut grass (*B. diandrus*), ryegrass (*Festuca* sp.), and mustard (*Brassica* sp.). Most of the annual, introduced species that comprise the majority of species and biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native communities with an annual dominated, non-native grassland (Jackson 1985). Non-native grassland within the

Master Plan Update area (1.6 acres) is dominated by red brome and common ripgut grass. Non-native grassland occurs in four locations: one in the northeast, one in the north-central, and two in the west. Non-native grassland is a Tier IIIB (common upland) community (City 2012).

Other Uplands

Eucalyptus Woodland

Eucalyptus woodland is dominated by eucalyptus (*Eucalyptus* sp.), an introduced genus that has often been planted purposely for wind blocking, ornamental, and hardwood production purposes. Most groves are monotypic, with the most common species being either the blue gum (*Eucalyptus globulus*) or river red gum (*E. camaldulensis*). The understory within well-established groves is usually very sparse due to the closed canopy and allelopathic nature of the abundant leaf and bark litter. If sufficient moisture is available, this species becomes naturalized and is able to reproduce and expand its range. Eucalyptus woodland (3.8 acres) occurs in the western and northeastern parts of the Master Plan Update area and is a Tier IV (other upland) community (City 2012).

Non-native Vegetation

Non-native vegetation is a category describing stands of naturalized shrubs and trees (e.g., acacia [*Acacia* spp.] and pepper tree [*Schinus* spp.]), many of which are also used in landscaping. Within the Master Plan Update area, patches of hottentot-fig (*Carpobrotus edulis*; 4.8 acres) comprise most of the non-native vegetation, and it occurs primarily adjacent to buildings and along the edge of the upper slope of Tecolote Canyon. Non-native vegetation is a Tier IV (other upland) community (City 2012).

Disturbed Land

Disturbed land includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal, exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes its ability to provide viable habitat.

Disturbed land (5.9 acres) within the Master Plan Update area consists of bare ground in some areas, and in others is dominated by non-native, ruderal forbs including garland daisy (*Glebionis coronaria*) and poison hemlock (*Conium maculatum*). The largest areas of disturbed land are in the western portion of the Master Plan Update area. Disturbed land is a Tier IV (other upland) community (City 2012).

Developed

Developed land is where permanent structures and/or pavement have been placed, which prevents the growth of vegetation, or where landscaping is clearly tended and maintained. Most of the Master Plan Update area (145.9 acres) is developed. Developed land is not assigned to a tier (City 2012).

Jurisdictional Areas

Jurisdictional areas include waters of the U.S. (WUS) under the jurisdiction of the U.S. Army Corps of Engineers (USACE), waters of the State (WS) under the jurisdiction of the California Department of Fish and Wildlife (CDFW), and City Wetlands.

Waters of the U.S.

USACE jurisdictional wetland boundaries are determined using three criteria (vegetation, hydrology, and soils) established for wetland delineations, as described in the Wetlands Delineation Manual (Environmental Laboratory 1987) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Arid West Supplement; USACE 2008). A site must meet all three wetland criteria to be considered wetland. Non-wetland WUS typically consist of intermittent or ephemeral streams where all three wetland criteria are not met.

No formal delineation of federal jurisdiction was conducted for the Master Plan Update and Conditional Use Permit (CUP) Amendment because no potential jurisdictional areas occur within the project impact footprint. The mapped southern willow scrub, southern willow scrub-disturbed, Arundo dominated riparian, and non-wetland streambed (Figure 5.3-1) would likely be regarded as Waters of the U.S. (WUS), however, because 1953 aerial photography (Nationwide Environmental Title Research, LLC 2016) shows the drainages that support these habitats as being present just after USD opened its doors in 1952. These drainages were not created during University construction; they are naturally occurring features.

Waters of the State

CDFW jurisdictional boundaries are determined based on the presence of riparian vegetation or regular surface flow. Streambeds within CDFW jurisdiction are delineated based on the definition of streambed as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supporting fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports riparian vegetation” (Title 14, Section 1.72). This definition for CDFW jurisdictional habitat allows for a wide variety of habitat types to be jurisdictional, including some that do not include wetland species (e.g., oak woodland). Jurisdictional limits for CDFW streambeds are defined by the top of bank. No formal delineation of State jurisdiction was conducted for the Master Plan Update because no potential jurisdictional areas occur within the project impact footprint. For the same reason explained above under WUS, it is likely that the mapped southern willow scrub, southern willow scrub-disturbed, and Arundo-dominated riparian are all Waters of the State (WS) (Figure 5.3-1).

City of San Diego Wetlands

San Diego Municipal Code (SDMC; Chapter 11, Article 3, Division 1) defines wetlands as areas that are characterized by any of the following (summarized) conditions. The boundaries of City Wetlands were determined following these conditions.

1. All areas persistently or periodically containing naturally occurring wetland vegetation communities;

2. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities;
3. Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands;
4. Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

Based on the City's definition of a wetland and 1953 aerial photography (see discussion under WUS, it is likely that the mapped southern willow scrub, southern willow-scrub, and *Arundo* dominated riparian are all City wetlands. A formal delineation was not conducted because they are located outside of the project impact footprint (Figure 5.3-1).

Sensitive Vegetation Communities

Sensitive vegetation communities are considered rare within the region or sensitive by CDFW (Holland 1986) and/or the City (SDMC Chapter 11, Article 3, Division 1 and City's Biology Guidelines [2012]). These communities in any form are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The Master Plan Update area supports 10 sensitive wetland/riparian and upland communities. This includes all of the wetland/riparian communities and upland vegetation communities assigned to Tiers I through IIIB. Tier IV other uplands are not sensitive.

Sensitive Plant Species

Sensitive plant species are those that are federal, state, or California Native Plant Society (CNPS) rare, threatened, or endangered; MSCP Narrow Endemics; or MSCP Covered Species. A species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS 2015; see Appendix C of Appendix D).

Observed

Three plant species observed ~~in during the vegetation mapping in 2014 and sensitive plant species surveys in 2015 and 2017~~ are sensitive: California adolphia (*Adolphia californica*), San Diego barrel cactus, and California box-thorn (*Lycium californicum*; Figure 5.3-1). Since the 2015 sensitive plant surveys focused on the impact areas within the Master Plan Update area, sensitive plant species that were mapped in 1993/1994 for the Biological Resources Report for the USD Master Plan Environmental Impact Report (Lettieri-McIntyre and Associates 1996) outside the survey areas that are still not developed are shown on Figure 5.3-1 except for San Diego County viguiera (*Viguiera laciniata*), which was determined to no longer be present. The current statuses of the other plant species are undetermined. These species include San Diego sagewort (*Artemisia palmeri*), western dichondra (*Dichondra occidentalis*), and ashy spike-moss (*Selaginella cinerascens*). All of these species are addressed further below. Sensitivity codes are explained in Appendix C of Appendix D. There is no USFWS-designated critical habitat for federal listed plant species within or adjacent to the Master Plan Update area. All sensitive plants observed during the 2015 survey were also observed during the 2017 survey.

California adolphia (*Adolphia californica*)

Sensitivity: CNPS Rare Plant Rank 2B.1

Distribution: Western San Diego County and northwestern Baja California, Mexico.

Habitat(s): Clay soils in dry canyons and washes in coastal sage scrub and chaparral.

Observations: Approximately four California adolphia plants were observed in 2015 by HELIX in Diegan coastal sage scrub in the western portion of the Master Plan Update area.

San Diego sagewort (*Artemisia palmeri*)

Sensitivity: CNPS Rare Plant Rank 4.2

Distribution: Coastal San Diego County; Baja California, Mexico.

Habitat(s): Stream courses, often within coastal sage scrub and southern mixed chaparral.

Observations: Approximately 100 individuals of San Diego sagewort were observed in 1993/1994 in an area that, at that time, supported disturbed southern willow riparian scrub (Lettieri-McIntyre and Associates 1996) in the north-central portion of the Master Plan Update area near Tecolote Canyon in the MHPA. That area now supports non-native vegetation, and San Diego sagewort was not noted there by HELIX during the surveys in 2014, ~~2015~~, or 2017.

Western dichondra (*Dichondra occidentalis*)

Sensitivity: CNPS Rare Plant Rank 4.2

Distribution: Santa Barbara County to Baja California, Mexico and on San Miguel Island.

Habitat(s): Dry, sandy banks in coastal sage scrub, chaparral, or southern oak woodland; often proliferates on recently burned slopes.

Observations: Twenty individuals of western dichondra were identified in 1993/1994 in a dense, north-facing patch of southern mixed chaparral in the MHPA (Lettieri-McIntyre and Associates 1996) but was not observed during the surveys in 2014, ~~2015~~, or 2017.

San Diego barrel cactus (*Ferocactus viridescens*)

Sensitivity: CNPS Rare Plant Rank 2B.1; MSCP Covered Species

Distribution: San Diego County and Baja California, Mexico.

Habitat(s): Diegan coastal sage scrub hillsides, often at the crest of slopes and growing among cobbles. Occasionally found on vernal pool periphery and mima mound topography.

Observations: Approximately 2,245 individuals of San Diego barrel cactus were identified in 1993/1994 in the western portion of the Master Plan Update area. HELIX noted more than 100 San Diego barrel cacti in some of these areas during its sensitive plant survey in 2014/2015, but since the focus of that survey was on proposed impact areas, not all potential habitat within the Master Plan Update boundary was covered. An area that supported approximately 86 of the 650 barrel cacti observed on campus in 1993/1994 (Lettieri-McIntyre and Associates 1996) has been developed with the West Campus Parking Structure off of Marian Way. The impacted individuals were relocated to locations outside the Master Plan Update area boundary in accordance with agreements reached during that parking structure's subsequent approval from the City (i.e., CUP/Site Development Permit (SDP) No. 41-0092).

California box-thorn (*Lycium californicum*)

Sensitivity: CNPS Rare Plant Rank 4.2

Distribution: In California, this species is found in Santa Barbara, Los Angeles, Orange, San Bernardino, and San Diego counties, as well as on a number of the Channel Islands.

Habitat(s): Coastal bluff scrub and coastal scrub.

Observations: Twenty-four individuals of California box-thorn were found in 2015 in two areas in maritime succulent scrub in the western part of the Master Plan Update area.

Ashy spike-moss (*Selaginella cinerascens*)

Sensitivity: CNPS Rare Plant Rank 4.1

Distribution: Orange and San Diego counties to northwestern Baja California, Mexico.

Habitat(s): Flat mesas in coastal sage scrub and chaparral.

Observations: The 1993/1994 surveys (Lettieri-McIntyre and Associates 1996) reported ashy spike-moss scattered diffusely throughout west-and south-facing slopes supporting Diegan coastal sage scrub and maritime succulent scrub. While HELIX did not observe this species in 2015 or 2017 (its surveys focused on impact areas), this species may still be present in locations that remain undeveloped.

San Diego County viguiera (*Viguiera laciniata*)

Sensitivity: CNPS Rare Plant Rank 4.2

Distribution: Orange and San Diego counties in California.

Habitat(s): Chaparral and coastal scrub in a variety of soil types.

Observations: Three populations totaling 350 individual plants were identified in Diegan coastal sage scrub and maritime succulent scrub in the western portion of the Master Plan Update area in 1993/1994 (Lettieri-McIntyre and Associates 1996). One of those populations (200 individuals) was impacted by development of a parking garage off of Marian Way. The other two populations were not observed by HELIX in 2014, ~~2015~~, or 2017. One is in an area still mapped as native scrub north of Linda Vista Way, east of Marian Way. The other, however, near the end of Camino de la Paz, have been replaced with/displaced by non-native vegetation.

Not Observed

Sensitive plant species that were not observed but that may have potential to occur in the Master Plan Update area are listed in Table 5.3-2, *Sensitive Plant Species Not Observed But That May Have Potential to Occur*, alphabetically by scientific name. This table also addresses all City Narrow Endemic plant species.

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
San Diego thornmint (<i>Acanthomintha ilicifolia</i>)	FT SE CNPS 1B.1 MSCP Covered, NE	None	Found in small populations in friable or broken, clay soils in grassy openings in chaparral, coastal scrub, valley and foothill grassland, and vernal pool areas. It occurs only in San Diego County in California at elevations from approximately 32 to 3,150 feet AMSL (CNPS 2015; Reiser 2001). This species is presumed extirpated from the USGS La Jolla Quadrangle where the campus lies (CNPS 2015), and there are no clay soils on campus. Therefore, it is not considered to have potential to occur in the Master Plan Update area.	Annual herb April to June
Shaw's agave (<i>Agave shawii</i>)	-- -- CNPS 2B.1 MSCP Covered, NE	None	Found in maritime succulent scrub, coastal bluff scrub, and coastal scrub at elevations from approximately 30 to 390 feet AMSL only in San Diego County in California. It is not reported from the USGS La Jolla Quadrangle (CNPS 2015), and Reiser (2001) notes only one possible native population south of Point Loma College and other introduced populations—none of which are near the USD campus. Therefore, Shaw's agave is not considered to have potential to occur in the Master Plan Update area.	Perennial leaf succulent September to May
San Diego ambrosia (<i>Ambrosia pumila</i>)	FE -- CNPS 1B.1 MSCP Covered, NE	None	Found in disturbed areas within chaparral, coastal sage scrub, grasslands, and vernal pools with sandy loam or clay (sometimes alkaline) soils (CNPS 2015). Its range in California includes coastal San Diego County and western Riverside County at elevations from approximately 65 to 1,360 feet AMSL (CNPS 2015; Reiser 2001). The nearest location to the USD campus reported by Reiser (2001) is "about one mile west of Mission San Diego de Alcalá near San Diego stadium where likely extirpated." San Diego ambrosia is not considered to have potential to occur in the Master Plan Update area.	Perennial, rhizomatous herb April to October

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
Aphanisma (<i>Aphanisma blitoides</i>)	-- -- CNPS 1B.2 MSCP Covered, NE	None	Found in sandy or gravelly coastal bluff scrub, coastal dunes, and coastal scrub at elevations from approximately 3 to 1,000 feet AMSL (CNPS 2015). Its range in California includes Santa Barbara, Los Angeles, Ventura, Orange, and San Diego counties, as well as a number of the Channel Islands (CNPS). In the La Jolla Quadrangle where the USD campus lies, CNPS is uncertain about the distribution or identity of the species. Reiser (2001) describes the historical mainland habitat of this species as "coastal bluffs near the ocean and beach dunes," none of which are present on the USD campus. Reiser (2001) also claims that this specie is close to, or may be, extirpated from San Diego County. Therefore, aphanisma is not considered to have potential to occur in the Master Plan Update area.	Annual herb February to June
Coastal dunes milk-vetch (<i>Astragalus tener</i> var. <i>titi</i>)	FE SE CNPS 1B.1 MSCP Covered, NE	None	Found in (often vernal mesic) coastal bluff scrub (sandy), coastal dunes, and coastal prairie at elevations from approximately 3 to 165 feet AMSL. Its range in California includes Los Angeles County (presumed extirpated), Monterey County, and San Diego County (presumed extirpated/uncertain about distribution or identity; CNPS 2015). Reiser (2001) reports that, other than a population extirpated on the Silver Strand, there are no other confirmed reports of this species in San Diego County. Therefore, coastal dunes milk-vetch is not considered to have potential to occur in the Master Plan Update area.	Annual herb March to May

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
Encinitas baccharis (<i>Baccharis vanessae</i>)	FT SE CNPS 1B.1 MSCP Covered, NE	None	Found on sandstone in maritime chaparral and cismontane woodland. Its range includes San Diego County, but it is not known from the La Jolla Quadrangle where the campus lies, and there may be no suitable habitat present. Therefore, Encinitas baccharis is not considered to have potential to occur in the Master Plan Update area.	Perennial, deciduous shrub August to November
Golden-spined cereus (<i>Bergerocactus emoryi</i>)	-- -- CNPS 2B.2 --	Low	Found in sandy soils in closed-cone coniferous forest, chaparral, and coastal scrub at elevations of approximately 10 to 1,295 feet AMSL. Maritime succulent scrub is the primary habitat of this cactus, and moist ocean breezes may be a key habitat requirement (Reiser 2001). Its range in California is southern San Diego County and Santa Catalina and San Clemente islands (CNPS 2015; Reiser 2001). CNPS (2015) does not include reports of the species in the USGS La Jolla Quadrangle. This perennial stem succulent likely would have been observed during campus surveys in 1993/1994 and 2015, so it is considered to have low potential to occur in the Master Plan Update area.	Perennial stem succulent May to June
Snake cholla (<i>Cylindropuntia</i> [<i>Opuntia</i>] <i>californica</i> var. <i>californica</i>)	-- -- CNPS 1B.1 MSCP Covered, NE	Low	Found in chaparral and coastal scrub on xeric hillsides at elevations of approximately 100 to 495 feet AMSL. Its range in California is San Diego County (CNPS 2015; Reiser 2001). CNPS (2015) does not include reports of the species in the USGS La Jolla Quadrangle. This perennial stem succulent likely would have been observed during campus surveys in 1993/1994 and 2015, so it is considered to have low potential to occur in the Master Plan Update area.	Perennial stem succulent April to May

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
Otay tarplant (<i>Deinandra conjugens</i>)	FT SE CNPS 1B.1 MSCP Covered, NE	None	Found in clay soils in coastal scrub and valley and foothill grassland at elevations of approximately 80 to 985 feet AMSL (CNPS 2015). Fractured clay soils in grasslands or lightly vegetated Diegan coastal sage scrub are the preferred habitats of this species (Reiser 2001). Its range in California is southern San Diego County (Reiser 2001). CNPS (2015) does not include reports of the species in the USGS La Jolla Quadrangle, which is likely too far north for this species, and there are no clay soils on campus. Therefore, Otay tarplant is not considered to have potential to occur in the Master Plan Update area.	Annual herb April to June
Short-leaved dudleya (<i>Dudleya [blochmaniae</i> <i>ssp.] brevifolia</i>)	-- SE CNPS 1B.1 MSCP Covered, NE	None	Found on Torrey sandstone in openings in maritime chaparral, chamise chaparral, coastal scrub, and Torrey pines forest at elevations from approximately 95 to 820 feet AMSL only in San Diego County in California (CNPS 2015; Reiser 2001). Small, iron-bearing concretions have been observed at all known sites for this species (Reiser 2001). Soils on campus do not include Torrey sandstone, so short-leaved dudleya is not considered to have potential to occur in the Master Plan Update area.	Perennial herb April to May
Variegated dudleya (<i>Dudleya variegata</i>)	-- -- CNPS 1B.2 MSCP Covered, NE	None	Found in clay soils in chaparral, cismontane woodland, coastal scrub, valley and foothill grassland, and vernal pool areas at elevations of approximately 10 to 1,900 feet AMSL (CNPS 2015). Usually grows in small areas devoid of shrub cover (Reiser 2001). Its range in California is San Diego County (CNPS 2015). Soils on campus do not include clays, so variegated dudleya is not considered to have potential to occur in the Master Plan Update area.	Perennial herb April to June

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
San Diego button-celery (<i>Eryngium aristulatum</i> var. <i>parishii</i>)	FE SE CNPS 1B.1 MSCP Covered, NE	Very Low	Found in mesic coastal scrub, valley and foothill grassland, and vernal pools in Los Angeles, Orange, Riverside and San Diego counties in California. It has been reported from the La Jolla Quadrangle where the campus lies but not to the CNDDB on or near the campus. Potential habitat on campus is very limited, so San Diego button-celery is considered to have very low potential to occur in the Master Plan Update area.	Annual/perennial herb April to June
Cliff spurge (<i>Euphorbia misera</i>)	-- -- CNPS 2B.2 --	Low	Found in rocky coastal bluff scrub, coastal scrub, and Mojavean desert scrub at elevations from approximately 30 to 1,640 feet AMSL. Its range in California includes Santa Barbara, Los Angeles, Orange, Riverside, and San Diego counties, as well as San Clemente, Santa Catalina, and Santa Cruz islands (CNPS 2015). This perennial shrub likely would have been observed during campus surveys in 1993/1994 and 2015, so it is considered to have low potential to occur in the Master Plan Update area.	Perennial shrub December to October
Beach goldenaster (<i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i>)	-- -- CNPS 1B.1 --	Low	Found in coastal chaparral, dunes, and scrub at elevations from sea level to approximately 4,020 feet AMSL in sandy locales (CNPS 2015; Reiser 2001). Its range in California is Santa Barbara (presumed extirpated) and San Diego counties (CNPS 2015). Reiser (2001) states that San Diego County populations are almost extirpated. This species, therefore, has low potential to occur in the Master Plan Update area.	Perennial herb March to December

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
Spreading navarretia (<i>Navarretia fossalis</i>)	FT -- CNPS 1B.1 -- ⁴ , NE	None	Found in chenopod scrub, shallow freshwater marshes and swamps, playas, and vernal pools at elevations of approximately 100 to 2,150 feet AMSL. Vernal pools and vernal swales are the preferred habitats of this species, and it is rarely found in shallow pools (Reiser 2001). Its range in California is Los Angeles, Riverside, San Luis Obispo, and San Diego counties (CNPS 2015). Potential habitat for this species does not occur on campus; therefore, it is not considered to have potential to occur in the Master Plan Update area.	Annual herb April to June
California adder's-tongue (<i>Ophioglossum californicum</i>)	-- -- CNPS 4.2 --	Low	Found in mesic chaparral and valley and foothill grasslands and on vernal pool margins at elevations of approximately 195 to 1,725 feet AMSL in Amador, Butte, Merced, Monterey, Mariposa, Orange, San Bernardino, San Diego, Stanislaus, and Tuolumne counties in California (CNPS 2015). CNPS (2015) does not include reports of the species in the USGS La Jolla Quadrangle. This species is considered to have low potential to occur in the Master Plan Update area due to limited potential habitat.	Perennial, rhizomatous herb December to June
California Orcutt grass (<i>Orcuttia californica</i>)	FE SE CNPS 1B.1 -- ⁴ , NE	None	Found in vernal pools at elevations of approximately 50 to 2,165 feet AMSL in Los Angeles, Riverside, Ventura, and San Diego counties in California (CNPS 2015). Potential vernal pool habitat for this species does not occur on campus; therefore, it is not considered to have potential to occur in the Master Plan Update area.	Annual herb April to August

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
San Diego mesa mint (<i>Pogogyne abramsii</i>)	FE SE CNPS 1B.1 -- ⁴ , NE	None	Found in vernal pools at elevations of approximately 295 to 655 feet AMSL only in San Diego County in California (CNPS 2015). Potential vernal pool habitat for this species does not occur on campus, and the campus may be too low in elevation. Therefore, San Diego mesa mint is not considered to have potential to occur in the Master Plan Update area.	Annual herb March to July
Otay Mesa mint (<i>Pogogyne nudiuscula</i>)	FE SE CNPS 1B.1 -- ⁴ , NE	None	Found in vernal pools at elevations of approximately 295 to 820 feet AMSL on Otay Mesa in San Diego County in California (CNPS 2015; Reiser 2001). Potential vernal pool habitat for this species does not occur on campus; the campus is too far north; and the campus may be too low in elevation. Therefore, Otay Mesa mint is not considered to have potential to occur in the Master Plan Update area.	Annual herb May to July

Table 5.3-2
SENSITIVE PLANT SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR¹
(continued)

Species	SENSITIVITY ² Federal State CNPS City	Potential to Occur	Habitat(s)/Range	Lifeform ³ and Bloom Period
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¹ This table addresses all City Narrow Endemic plant species even if they do not have potential to occur on the USD campus.

² See Appendix C of Appendix D for an explanation of sensitivity codes.

Note: Sensitivity Codes used in this table Include:

FE Federal Listed Endangered

FT Federal Listed Threatened

SE State Listed Endangered

CNPS California Native Plant Society

1B.1 Rare, threatened, or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

1B.2 Rare, threatened, or endangered in California and elsewhere; moderately endangered in California (20 to 80 percent occurrences threatened/moderate degree and immediacy of threat)

2B.1 Rare, threatened, or endangered in California but more common elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

2B.2 Rare, threatened, or endangered in California but more common elsewhere; moderately endangered in California (20 to 80 percent occurrences threatened/moderate degree and immediacy of threat)

4.2 A watch list for species of limited distribution; moderately endangered in California (20 to 80 percent occurrences threatened/moderate degree and immediacy of threat)

MSCP, NE Multiple Species Conservation Program Covered, Narrow Endemic

³ Lifeform and bloom period are from CNPS (2015).

⁴ Based on a 2006 federal district court ruling that the City's MSCP Subarea Plan does not provide adequate protection for Riverside fairy shrimp (*Streptocephalus woottoni*), the City surrendered permit coverage for seven vernal pool species on April 20, 2010 (City 2010). The seven species include San Diego fairy shrimp (*Branchinecta sandiegonensis*), Riverside fairy shrimp, Otay Mesa mint, San Diego mesa mint, California Orcutt grass, San Diego button-celery (*Eryngium aristulatum* var. *parishii*), and spreading navarretia. The USFWS subsequently cancelled the permit as it applied to those seven species on May 14, 2010 (USFWS 2011). Development involving take of any of the seven vernal pool species, therefore, requires authorization from the USFWS through the federal incidental take process until the City completes a new Vernal Pool Habitat Conservation Plan and enters into another Implementing Agreement for a new federal Incidental Take Permit for those species.

Sensitive Wildlife Species

Sensitive wildlife species are those that are considered federal or State rare, threatened, or endangered or MSCP Covered Species. It also includes wildlife on CDFW's Special Animals List (CDFW Natural Diversity Database 2015).

Observed

Three animal species observed in 2014/2015 are sensitive: Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), Nuttall's woodpecker (*Picoides nuttallii*), and coastal California gnatcatcher (*Polioptila californica californica*; Figure 5.3-1). Sensitive animal species that were mapped in 1993/1994 for the Biological Resources Report for the USD Master Plan Environmental Impact Report (Lettieri-McIntyre and Associates 1996) in areas that are still not developed today have been added to the 2014 survey date presented in Figure 5.3-1. These species include Cooper's hawk (*Accipiter cooperii*), loggerhead shrike (*Lanius ludovicianus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and additional locations for the coastal California gnatcatcher. All five species are addressed further below. Sensitivity codes are explained in Appendix C of Appendix D. There is no USFWS-designated critical habitat for federal listed animal species within or adjacent to the Master Plan Update area.

Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*)

Sensitivity: State Species of Special Concern; MSCP Covered Species

Distribution: Southern Orange and San Bernardino counties, south to the cape of Baja California, Mexico.

Habitat(s): Coastal sage scrub, chaparral, edges of riparian woodlands and washes. Also found in weedy, disturbed areas adjacent to these habitats. Important habitat requirements include open, sunny areas, shaded areas, and abundant invertebrate prey base, particularly termites (*Reticulitermes* sp.).

Observations: This whiptail was observed in 2014 by HELIX in maritime succulent scrub in the western portion of the Master Plan Update area.

Cooper's hawk (*Accipiter cooperii*)

Sensitivity: State Watch List; MSCP Covered Species

Distribution: Throughout the continental U.S. (excluding Alaska) and parts of both Montana and the Dakotas. Winters south to Mexico and Honduras.

Habitat(s): In San Diego County, tends to inhabit lowland riparian areas and oak woodlands in proximity to suitable foraging areas such as scrubland or fields.

Observations: One Cooper's hawk was observed in 1993/1994 perched in the north-central portion of the Master Plan Update area near Tecolote Canyon in the MHPA (Lettieri-McIntyre and Associates 1996).

Loggerhead shrike (*Lanius ludovicianus*)

Sensitivity: Federal Bird of Conservation Concern; State Species of Special Concern

Distribution: In San Diego County, the loggerhead shrike is an uncommon, year-round resident but absent from pinyon woodlands in higher elevations of the Santa Rosa and Vallecito mountains.

Habitat(s): Grassland, open sage scrub and chaparral, and desert scrub.

Observations: One loggerhead shrike was observed in 1993/1994 perched on a laurel sumac snag in the western portion of the Master Plan Update area (Lettieri-McIntyre and Associates 1996).

Nuttall's woodpecker (*Picoides nuttallii*)

Sensitivity: Federal Bird of Conservation Concern

Distribution: In San Diego County, the Nuttall's woodpecker inhabits nearly the entire coastal slope but is most concentrated in inland canyons and foothills with coast live oak (*Quercus agrifolia*).

Habitat(s): Riparian, oak, and coniferous woodlands.

Observations: The Nuttall's woodpecker was observed in 2014 by HELIX in eucalyptus woodland in the western portion of the Master Plan Update area.

Coastal California gnatcatcher (*Polioptila californica californica*)

Sensitivity: Federal Listed Threatened; State Species of Special Concern; MSCP Covered Species

Distribution: Southern Los Angeles, Orange, western Riverside, and San Diego counties south into Baja California, Mexico.

Habitat(s): Coastal sage scrub

Observations: The coastal California gnatcatcher was observed in 2014 by HELIX in the southwestern portion of the Master Plan Update area in maritime succulent scrub/Diegan coastal sage scrub. The coastal California gnatcatcher was observed in 1993/1994 as one family group in the western portion of the Master Plan Update area and one individual (likely a dispersing juvenile) in the north-central portion of the Master Plan Update area near Tecolote Canyon in the MHPA (Lettieri-McIntyre and Associates 1996). It is assumed herein that all maritime succulent scrub and Diegan coastal sage scrub within the Master Plan Update boundary is occupied by the gnatcatcher.

San Diego black-tailed jackrabbit (*Lepus californicus bennettii*)

Sensitivity: State Species of Special Concern

Distribution: Southern Santa Barbara County, south on the coastal slope to the vicinity of San Quintin, Baja California, Mexico. Localities on the eastern edge of its range include Jacumba and San Felipe Valley in San Diego County.

Habitat(s): Occurs primarily in open habitats including coastal sage scrub, chaparral, grasslands, croplands and open, disturbed areas if there is at least some shrub cover present.

Observations: This jackrabbit was observed in 1993/1994 in the north-central portion of the Master Plan Update area near Tecolote Canyon in the MHPA (Lettieri-McIntyre and Associates 1996).

Not Observed

Sensitive animal species that were not observed but may have potential to occur in the Master Plan Update area are listed in Table 5.3-3, *Sensitive Animal Species Not Observed But That May Have Potential to Occur*, alphabetically by scientific name.

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Invertebrates			
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	FE -- --	None	<p>Extant populations of this species primarily inhabit grassland, remnant forbland, juniper woodland, and open scrub and chaparral communities that support its primary larval host plant (dot-seed plantain [<i>Plantago erecta</i>]) and a variety of adult nectar resources. These areas tend to be distributed as patches in a mosaic of vegetation communities. Microhabitat use appears to include patches of exposed soil with abundant sun exposure. The Quino checkerspot has been reported over a wide elevation range from approximately 500 feet AMSL to higher than 5,000 feet AMSL (USFWS 2003).</p> <p>The USD campus is outside the potential range of the Quino based on the recommended survey area map in the USFWS Quino Checkerspot Butterfly Survey Guidelines (USFWS 2014). Therefore, this species is not considered to have potential to occur in the Master Plan Update area.</p>
Amphibians			
Western spadefoot (<i>Spea hammondi</i>)	-- SSC --	Low	<p>The western spadefoot inhabits floodplains, washes, and low hills. In southern California, its habitats include coastal sage scrub, chaparral, and grassland. Important habitat components include temporary pools (which form during winter and spring rains) for breeding and friable soils for burrowing. This species occurs in California's Central Valley and the San Francisco Bay area south along the coast to northwestern Baja California, Mexico. Potential habitat for this species is absent or very limited on campus, so it is considered to have low potential to occur in the Master Plan Update area.</p>

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
 (continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Reptiles			
Southern California legless lizard (<i>Anniella stebbinsi</i>) Anniella pulchra has been divided into five species (CaliforniaHerps.com 2015a). CDFW (2015) still lists silvery legless lizard (<i>Anniella pulchra pulchra</i>).	-- SSC --	Low	Found in moist, warm, loose soil in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces in southern California south of the Transverse Ranges into northern Baja California, Mexico (CaliforniaHerps.com 2015a). Potential habitat for this species is extremely limited or absent on campus, so it is considered to have low potential to occur in the Master Plan Update area.
Red-diamond rattlesnake (<i>Crotalus ruber</i>)	-- SSC --	Low	The red-diamond rattlesnake can be found in chaparral, coastal sage scrub, and along creek banks, particularly among rock outcrops or piles of debris supporting rodents. It ranges from extreme southeastern Los Angeles County (Diamond Bar) into southern San Bernardino County, and south into southern Baja California, Mexico. Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.
Coronado skink (<i>Plestiodon skiltonianus interparietalis</i>)	-- SSC --	Low	This skink can be found in grasslands, coastal sage scrub, open chaparral, pine oak woodland, and coniferous forests. It prefers areas where there is abundant leaf litter or low, herbaceous growth. It occurs in inland southern California south through the north Pacific coast region of northern Baja California Norte, Mexico at elevations from sea level to 8,300 feet AMSL (CaliforniaHerps.com 2015b). Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
 (continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Reptiles (cont.)			
Coast horned lizard (<i>Phrynosoma blainvillii</i>)	-- SSC MSCP Covered	Low	<p>Coast horned lizards are found in a wide variety of habitats including coastal sage scrub, chaparral, grassland, coniferous forest, oak woodland, riparian, and the margins of the higher elevation desert where it is restricted to juniper-desert chaparral (Grinnell and Grinnell 1907, Van Denburgh 1922, Klauber 1939, Smith 1946, Dixon 1967, Stebbins 1985, Jennings and Hayes 1994, and Brattstrom 1997 in Hollingsworth and Beaman 2005). This species has been reported from elevations ranging from sea level to 8,000 feet AMSL (Brattstrom 1997 in Hollingsworth and Beaman 2005).</p> <p>Within each of these habitats, this species prefers areas with loose, fine soils, an abundance of open areas for basking. It is insectivorous and primarily feeds on native harvester ants (<i>Pogonomyrmex</i> spp.) but will also feed on termites, beetles, flies, wasps, and grasshoppers (Ingles 1929, Reeve 1952, Miller and Stebbins 1964, Dixon 1967, Pianka and Parker 1975, Stebbins 1985, and Jennings and Hayes 1994 in Hollingsworth and Beaman 2005). Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.</p>
Coast patch-nosed snake (<i>Salvadora hexalepis virgultea</i>)	-- SSC --	Low	<p>Found in semi-arid brushy areas and chaparral in canyons, rocky hillsides, and plains in California from the northern Carrizo Plains in San Luis Obispo County, south through the coastal zone, south and west of the deserts, into coastal northern Baja California, Mexico (CaliforniaHerps.com 2015c). Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.</p>

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
 (continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Reptiles (cont.)			
Two-striped garter snake (<i>Thamnophis hammondi</i>)	-- SSC --	Low	The two-striped garter snake occurs primarily along permanent creeks and streams but also around vernal pools and along intermittent streams. It is occasionally found in chaparral or other habitats relatively far from permanent water. This snake ranges from Monterey County south through the Coastal Ranges into northwestern Baja California, Mexico. Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.
Birds			
Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>)	-- WL MSCP Covered	Moderate	This sparrow prefers coastal sage scrub (Unitt 2004) but can also be found breeding in coastal bluff scrub, low-growing serpentine chaparral, and along the edges of tall chaparral habitats (Thorngate and Parsons 2005), as well as in open chaparral or coastal sage scrub and grasslands with scattered shrubs (Unitt 2004). Following a chaparral fire, suitable habitat may develop in the early stages of chaparral re-growth (Gallagher 1997), and rufous-crowned sparrows may stay in such open, disturbed habitats for years (Rising 1996, Collins 1999). The canescens subspecies of <i>Aimophila ruficeps</i> is a resident of southwest California on the slopes of the Transverse and Coastal Ranges from Los Angeles County south to Baja California Norte, Mexico. It can also be found on San Martin Island (Thorngate and Parsons 2005). The southern California rufous-crowned sparrow has moderate potential to occur in the Master Plan Update area.

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
(continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Birds (cont.)			
Bell's sage sparrow (<i>Artemisospiza belli belli</i>)	BCC WL --	Low	The Bell's sage sparrow can be found in chaparral and sage scrub. The habitat must not be too dense or have too much leaf litter. Its distribution throughout San Diego County is patchy, which often shifts to include partially recovered burned areas (Unitt 2004). The Bell's sage sparrow has low potential to occur in the Master Plan Update area due to its particular habitat requirements.
Burrowing owl (<i>Athene cunicularia</i>)	-- SSC MSCP Covered	Very Low	The burrowing owl is a declining species that occurs in grassland or open scrub habitats. In 2003, there were an estimated 25 to 30 resident pairs of in San Diego County located primarily in the southern quarter of the county and on North Island (Lincer and Bloom 2007). The burrowing owl has very low potential to occur on campus due to its rarity and limited potential habitat on campus.
Coastal cactus wren (<i>Camphylorhynchus brunneicapillus sandiegensis</i>)	-- SSC MSCP Covered	Low	<p>The key element of San Diego cactus wren habitat is thickets of cholla (<i>Opuntia prolifera</i>) or prickly pear cacti (<i>O. littoralis</i>, <i>O. oricola</i>) tall enough to support and protect the birds' nests (Shuford et al. 2008).</p> <p>The San Diego Cactus Wren has a very limited range, extending from extreme northwestern Baja California, Mexico (Valle De las Palmas) north through the coastal lowlands of San Diego County and, apparently, into southern Orange County (Rea and Weaver 1990 in Shuford et al. 2008). Unitt (2004) shows possible breeding for the coastal cactus wren in a grid cell that appears to include the USD campus, and the campus supports maritime succulent scrub with coastal cholla and coastal prickly pear cacti. Still, due to the limited amount of potential habitat in the Master Plan Update area and its location surrounded by development, the potential for coastal cactus wren to occur is considered low.</p>

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
(continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Birds (cont.)			
Yellow-breasted chat (<i>Icteria virens</i>)	-- SSC --	Low	In California, the yellow-breasted chat is found in dense riparian thickets and brush during its breeding season, and it is mostly absent during the winter (Ricketts and Kus 2000). While there is some potential riparian habitat on campus, it is extremely limited in area, so this species is considered to have low potential to occur in the Master Plan Update area.
Yellow warbler (<i>Setophaga petechia</i>)	BCC SSC --	Low	The yellow warbler can be found in riparian woodland, Mojave riparian forest, mule fat scrub, or southern willow scrub in California during its breeding season. It winters in Central America and South America. While there is some potential riparian habitat on campus, it is extremely limited in area, so this species is considered to have low potential to occur in the Master Plan Update area.
Least Bell's vireo (<i>Vireo bellii pusillus</i>)	FE SE MSCP Covered	Low	The least Bell's vireo is found in mature riparian woodland, Mojave riparian forest, mule fat scrub, or southern willow scrub in California and northern Baja California, Mexico during its breeding season. It winters in southern Baja California, Mexico. This species has been reported to the CNDDDB in Tecolote Canyon (in the MHPA) near the northeastern portion of the Master Plan Update boundary. However, the potential vireo habitat in the MHPA is more than 500 feet away from the nearest Master Plan Update proposed construction. While there is some potential riparian habitat on campus, it is extremely limited in area, so this species is considered to have low potential to occur in the Master Plan Update area.

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
(continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Mammals			
Dulzura pocket mouse (<i>Chaetodipus californicus femoralis</i>)	-- SSC --	Low	Found primarily in chaparral but has been trapped in mule fat scrub and is known to occur in coastal sage scrub. It has been reported from the mouth of the Santa Margarita River south into northern Baja California, Mexico. In San Diego County, this species ranges eastward to the desert transition zone. While there is some potential habitat on campus, it is limited in area, so this species is considered to have low potential to occur in the Master Plan Update area.
Northwestern San Diego pocket mouse (<i>Chaetodipus fallax fallax</i>)	-- SSC --	Low	Found in open areas of coastal sage scrub and weedy growth, often on sandy substrates. This species ranges from Los Angeles County and southern San Bernardino County south into west-central Baja California, Mexico. While there is some potential habitat on campus, it is limited in area, so this species is considered to have low potential to occur in the Master Plan Update area.

Table 5.3-3
SENSITIVE ANIMAL SPECIES NOT OBSERVED BUT THAT MAY HAVE POTENTIAL TO OCCUR
 (continued)

Species	Sensitivity ¹ Federal State City	Potential to Occur	Habitat(s)/Range
Mammals			
San Diego desert woodrat (<i>Neotoma lepida intermedia</i>)	-- SSC --	Low	The San Diego desert woodrat can be found in open chaparral and coastal sage scrub, often building large, stick nests in rock outcrops or around clumps of cactus or yucca. It occurs along the coastal slope of southern California from San Luis Obispo County south into coastal northwestern Baja California, Mexico. Based on the limited availability of potential habitat on campus, this species is considered to have low potential to occur in the Master Plan Update area.

¹ See Appendix C of Appendix D for an explanation of sensitivity codes (HELIX 2016a).

Note: Sensitivity codes used in this table include:

- FE Federal Listed Endangered
- BCC Federal Bird of Conservation Concern
- SE State Listed Endangered
- SSC State Species of Special Concern
- WL State Watch List
- MSCP Covered Multiple Species Conservation Program Covered

Wildlife Corridors

Regional wildlife corridors connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife over a large scale and the consequent mixing of genes between populations. Local corridors allow wildlife access to resources such as food, water, and shelter within the framework of its daily routine.

Tecolote Canyon Natural Park occurs north of, and adjacent to, the Master Plan Update area, and is in the MHPA. The upper portion of the southern slope of Tecolote Canyon in the Master Plan Update area is also in the MHPA. While these MHPA lands on campus are connected to a large block of native habitat that has the ability to support a diversity of plant and animal life, they do not connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife on a regional scale. Therefore, Tecolote Canyon and the MHPA within the Master Plan Update area serve only as a local but not regional wildlife corridor.

Regulatory Setting

Federal

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others (including those not sensitive or MSCP Covered). Disturbance that causes nest destruction or abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a “take.” The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country, and is enforced in the United States by the USFWS. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). As a general/standard condition, the Master Plan Update project must comply with the MBTA.

Clean Water Act

Under Section 404 of the Clean Water Act (CWA), the USACE is charged with regulating the discharge of dredge and fill materials into jurisdictional WUS. Section 401 of the Clean Water Act (CWA) requires that any applicant for a federal license or permit to conduct any activity that may result in a discharge to WUS must obtain a Water Quality Certification, or a waiver thereof, from the state in which the discharge originates. In California, the RWQCB issues Water Quality Certifications.

State of California

California Environmental Quality Act

Primary environmental legislation in California is found in the CEQA and its implementing guidelines (State CEQA Guidelines), requiring that projects with potential adverse effects or impacts to the environment undergo environmental review. This SEIR is part of that environmental review. Adverse

impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Fish and Game Code

Section 1600 of California Fish and Game Code requires a Streambed Alteration Agreement for any activity that would alter the flow, change or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake (i.e., WS).

Pursuant to California Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by California Fish and Game Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. As a general/standard condition, the Master Plan Update project must comply with California Fish and Game Code Sections 3503 and 3503.5.

City of San Diego

Multiple Species Conservation Program Subarea Plan

The City's MSCP Subarea Plan (City 1997b) was prepared to meet the requirements of the State Natural Community Conservation Plan (NCCP) Act of 1992. The Subarea Plan is consistent with NCCP and is a stand-alone document that describes how proposed development projects may be implemented relative to the City's MSCP-designated regional preserve (MHPA).

Multi-habitat Planning Area. The MHPA was developed by the City in cooperation with the USFWS, CDFW, property owners, developers and environmental groups using the Preserve Design Criteria contained in the MSCP Plan, and the City Council-adopted criteria for the creation of the MHPA. MHPA lands are large blocks of native habitat that have the ability to support a diversity of plant and animal life and thus are included within the City's MSCP Subarea Plan for habitat conservation. The MHPA also delineates core biological resource areas and corridors targeted for conservation, as these lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. While MHPA lands are considered by the City to be a sensitive biological resource and intended to be mostly void of development activities, development is allowed in the MHPA subject to the requirements of the MSCP Plan.

Land Use Adjacency Guidelines. Land uses adjacent to the MHPA are to be managed to ensure that indirect impacts to the MHPA are minimized. The City has published Land Use Adjacency Guidelines, as part of the City's MSCP Subarea Plan, which outline these management requirements and address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development. All projects adjacent to the MHPA would be required to comply with the Land Use Adjacency Guidelines as a condition of approval.

Special Conditions for MSCP Covered Species and Narrow Endemics. Most impacts to MSCP Covered Species are considered to be mitigable through appropriate habitat preservation within the MHPA.

While this is true for species with wide geographic distributions, certain species with very limited geographic ranges require additional conservation measures to assure their long-term survival (City 1997b). These MSCP Covered species are referred to as Narrow Endemics and have additional conditions placed upon them.

Per Appendix A of the MSCP Subarea Plan, conditions of coverage also apply to the 85 MSCP Covered Species. Projects should be designed to avoid impacts to Covered Species in the MHPA where feasible. Where direct or indirect impacts could occur, applicable conditions of coverage should be translated into mitigation measures.

Inside and outside the MHPA, projects must incorporate consistency measures listed in the MSCP Subarea Plan (i.e., Sections 1.4.2 and 1.4.3) as well as general and specific directives for Urban Areas (i.e., Sections 1.5.1 and 1.5.7), which are addressed in further detail in Section 5.1, *Land Use*.

Environmentally Sensitive Lands Regulations

Environmentally Sensitive Lands (ESL) include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2012) as outlined in the SDMC ESL Regulations (Chapter 14, Article 3, Division 1). Impacts to biological resources within the MHPA must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City. In addition to aiding implementation and interpretation of the ESL Regulations, the City's Biology Guidelines define sensitive biological resources and also provide further requirements for protection of selected sensitive species (i.e., Cooper's hawk and burrowing owl). The assessment of the sensitivity of vegetation communities and plant and animal species presented in this document follows those regulations and guidelines.

The purpose of the ESL Regulations is to "protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands." The regulations require that development avoid impacts to certain sensitive biological resources as much as possible including all MHPA lands; wetlands and vernal pools in naturally occurring complexes; listed, non-MSCP Covered Species; and MSCP Narrow Endemic species. Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. In addition to protecting the wetlands themselves, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect associated functions and values.

5.3.2 Impact

Issue 1: Would the proposal result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?

Issue 2: Would the proposal result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Impact Thresholds

Based on the City Significance Determination Thresholds (2011), significant impacts to biological resources are evaluated in several different ways in accordance with the City's Biology Guidelines (2012) and SDMC pertaining to ESL Regulations. Specifically:

Sensitive Species

The City's permit to "take" covered species under the MSCP is based on the concept that 90 percent of lands within the MHPA will be preserved. Therefore, any encroachment into the MHPA (in excess of the allowable encroachment by a project) is considered a significant impact and requires that land be added to the MHPA that is at least equivalent to what would be removed.

Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or federal listed species and all City-defined Narrow Endemics would be considered significant. Certain species covered by the MSCP (as noted in the City's Biology Guidelines) and other species not covered by the MSCP may be considered significant on a case-by case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP. This may include species in the CNPS' Inventory of Rare and Endangered Plants (CNPS 2015) or on the CDFW's list of Special Animals (CDFW Natural Diversity Database 2015).

Sensitive Vegetation Communities

Lands containing Tier I, II, IIIA and IIIB habitats and all wetlands are considered sensitive and declining habitats and impacts to these resources may be considered significant. (Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant).

Impacts are either direct or indirect. A direct impact is a physical change in the environment that is caused by and immediately related to a project, wherein the primary effect is removal of existing habitat, often replacing it with graded or developed areas. Indirect impacts consist of reasonably foreseeable secondary effects of a project (such as noise or edge effects) that lead to habitat degradation. The magnitude of an indirect impact may be the same as a direct impact; however, the effects from an indirect impact often take longer to become apparent.

The biological resources section of the City Significance Thresholds does not define cumulative impacts but provides several examples of impacts considered cumulatively significant. For example, direct impacts to vernal pools and direct impacts to perennial native grasslands greater than 0.1 acre may be considered cumulatively significant, as would impacts to State or federal listed species not covered by the MSCP, on a case-by-case basis. In general, projects that conform to the MSCP as specified by the City's Subarea Plan and its implementing ordinances are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP, including vegetation communities identified as Tier I through IV. Refer to Section 6.0, *Cumulative Impacts*, for a discussion of the cumulative effects associated with the Master Plan Update project.

According to the City's Significance Determination Thresholds (2011), a project would have a significant direct or indirect impact on biological resources if the project would:

- a. Substantially affect an endangered, rare, or threatened species of animal or plant or the habitat of the species; and/or
- b. Substantially diminish important upland or riparian habitat for fish, wildlife or plants.

Additionally, nesting birds are protected by the MBTA and California Fish and Game Code. Impacts to nesting birds would be significant.

Impact Analysis

Previously Disclosed Biological Resources Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to sensitive vegetation communities, sensitive plants, and sensitive wildlife from phased buildout of the campus through the year 2030. The analysis concluded that development would significantly impact sensitive vegetation (maritime succulent scrub, Diegan coastal sage scrub, and southern willow riparian scrub), one sensitive plant (San Diego barrel cactus), and one sensitive animal (coastal California gnatcatcher). Mitigation measures were identified to reduce these impacts to less-than-significant levels including payment into the City's Habitat Acquisition Fund; enhancement or creation of wetland habitat; transplantation of San Diego barrel cactus; and control of construction noise and night lighting. Non-native grassland was not considered a sensitive vegetation community in the 1996 Master Plan FEIR.

The following discussion focuses on the potential biological resources impacts associated with revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Impacts from Master Plan Update

Direct Impacts

Sensitive Plant Species. The project would directly impact two sensitive plant species through their removal, as follows (Figure 5.3-1).

- As many as nine San Diego barrel cactus (CNPS Rare Plant Rank 2B.1; MSCP Covered Species) from Project Site No. 19
- Ashy spike-moss (CNPS Rare Plant Rank 4.2) from Project Site Nos. 17, 19, 22, and 23

San Diego Barrel Cactus. Impacts to San Diego barrel cactus would be less than significant. While San Diego barrel cactus has a CNPS Rare Plant Rank 2B.1 (rare, threatened, or endangered in California but more common elsewhere, greater than 80 percent of occurrences threatened), it is not federal or State listed, and it is an MSCP Covered Species considered to be adequately protected in the MHPA. This population lies outside of the MHPA and therefore impacts would not be considered significant since it is an MSCP Covered Species. To the extent feasible, USD would

attempt to transplant any barrel cacti that would be impacted by Project Site No. 19 to appropriate habitat within the campus boundary.

Ashy Spike-moss. Impacts to ashy spike-moss would be less than significant due to this species' low level of sensitivity.

Implementation of the Master Plan Update would not directly impact California boxthorn, California adolphia, San Diego sagewort, or western dichondra. Other sensitive plant species that were not observed but were considered for their potential to occur there (Table 5.3-2) were all determined to have either no potential to occur or low potential to occur. Therefore, these species are not likely to be present or directly impacted by the Master Plan Update.

Sensitive Wildlife Species. Implementation of the Master Plan Update would result in direct impacts to sage scrub and eucalyptus woodland communities where the following sensitive animal species were observed: coastal California gnatcatcher, loggerhead shrike, Nuttall's woodpecker, and Belding's orange-throated whiptail. While the San Diego black-tailed jackrabbit was also observed (but not on any of the project sites within the Master Plan Update area), it was observed adjacent to Tecolote Canyon and is not expected to occupy habitats within the Master Plan Update area that would be directly impacted due to their isolation and location surrounded by existing development. While the Cooper's hawk was also not observed in an area that would be directly impacted, this species has potential to utilize other areas within the Master Plan Update boundary that would be directly impacted. The Cooper's hawk is addressed further below.

It is assumed herein that all maritime succulent scrub and Diegan coastal sage scrub is occupied by the coastal California gnatcatcher. The gnatcatcher would be directly impacted through habitat loss outside the MHPA by Project Site Nos. 17, 19, 22, and 23 (Figure 5.3-1). There would be no direct impacts to the species within the MHPA during implementation of the Master Plan Update and, therefore, no direct impacts to coastal California gnatcatchers within the MHPA. Like the gnatcatcher, direct impacts to Belding's orange-throated whiptail and Cooper's hawk from loss of habitat outside the MHPA from Project Site Nos. 17, 19, 22, and 23 (Figure 5.3-1) would be less than significant because these species are also MSCP Covered Species considered to be adequately protected in the MHPA.

Direct impacts to the loggerhead shrike (federal Bird of Conservation Concern and State Species of Special Concern; Appendix C in Appendix D) and Nuttall's woodpecker (federal Bird of Conservation Concern) from loss of habitat from Project Site Nos. 17, 19, 22, and 23 (Figure 5.3-1) would be less than significant due to these species' lower levels of sensitivity.

Other sensitive animal species that were not observed but were considered for their potential to occur there (Table 5.3-3) were all determined to have low potential to occur except the southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), which has moderate potential to occur in scrub and chaparral habitats. Those species with low potential to occur are not likely to be present and directly impacted by the Master Plan Update. Direct impacts to the southern California rufous-crowned sparrow from Diegan coastal sage scrub habitat loss from Project Site Nos. 17, 19, 22, and 23 outside the MHPA would be less than significant because this sparrow is an MSCP Covered Species considered to be adequately protected in the MHPA.

Sensitive Vegetation Communities

Implementation of the Master Plan Update would affect approximately 0.5 acre of sensitive vegetation communities, which provide important habitat for endangered, rare, or threatened species, and mitigation would be required. None of the project impacts would occur in the MHPA. Impacts to Diegan coastal sage scrub would be significant because it is a Tier II habitat. Impacts to Tier IV other uplands and other communities (i.e., non-native vegetation and developed) would be less than significant because they are not considered sensitive, and no mitigation would be required (Table 5.3-4, *Impacts to Vegetation Communities/Land Cover Types*). Removal of developed land from the MHPA is proposed as part of a Boundary Line Correction discussed below under *Issue 5*.

Table 5.3-4 IMPACTS TO VEGETATION COMMUNITIES/LAND COVER TYPES			
Vegetation Community	Tier	Acreage Impacted ¹	Project Number
Wetland/Riparian			
Southern willow scrub	--	--	--
Southern willow scrub-disturbed	--	--	--
Arundo dominated riparian	--	--	--
Subtotal Wetland/Riparian		--	--
Upland			
Maritime succulent scrub	I	--	--
Maritime succulent scrub-disturbed	I	--	--
Diegan coastal sage scrub	II	0.5	17, 19, 22, 23
Diegan coastal sage scrub-disturbed	II	--	--
Baccharis scrub	II	--	--
Southern mixed chaparral	IIIA	--	--
Non-native grassland	IIIB	--	--
Subtotal Upland		0.5	17, 19, 22, 23
Eucalyptus woodland	IV	0.9	17, 19, 22
Disturbed land	IV	1.9	17, 22, 23
Subtotal Other Upland		2.8	17, 19, 22, 23
Other			
Non-native vegetation	--	0.9	17, 22, 23, 27
Developed	--	16.1	17-30
Subtotal Other		17.0	17-30
TOTAL		20.3	17-30

¹ All impacts would be outside the MHPA. Impacts include Zone 1 brush management. Where Zone 2 would encroach into the MHPA, USD would request approval for alternative compliance to avoid the impacts.

Indirect Impacts

Indirect impacts consist of secondary effects of project development including those from drainage and toxics, lighting, noise, public access, invasive plant species, and fugitive dust. Indirect impacts from construction activity can also affect nesting birds. The magnitude of an indirect impact can be the same as a direct impact, but the effect may take longer to become apparent. Indirect impacts to

the MHPA would be avoided through implementation of the MHPA LUAG and incorporation of project features as follows:

Drainage and Toxics

The release and spread of toxins, chemicals, petroleum products, and other elements can degrade or harm the natural environment or ecosystems processes. Should this occur in ESL (or in the MHPA), the impacts would be significant. All potential drainage and toxics impacts, however, would be minimized through the required use of the City's Construction Site BMPs (SDMC Section 43.0301), in compliance with the Land Use Adjacency Guidelines, and by project design as outlined in the Master Plan Update that would capture, treat, and store storm water runoff before it enters undeveloped or transitional areas consistent with the existing drainage conditions and per current storm water regulations. Therefore, potential indirect impacts resulting from drainage or impaired water quality from the Master Plan Update would be less than significant.

Lighting

Night lighting exposes wildlife to an unnatural light regime that may adversely affect foraging patterns, increase predation risk, cause biological clock disruptions, and result in a loss of species diversity. Lighting can be a significant indirect impact if it spills into ESL or into the MHPA. Potential night lighting impacts would be minimized to less-than-significant levels, however, during construction (if used) and by the Master Plan Update by adherence to the City's Outdoor Lighting Regulations (SDMC Section 142.0740).

Brush Management

The City requires that new development located adjacent to and topographically above the MHPA (e.g., along canyon edges) be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside the existing MHPA, while Zone 2 is considered "impact neutral" within the MHPA.

The Master Plan Update incorporates City requirements for brush management (SDMC §142.0412) and Landscape Standards (City 1997d). There are two projects (20 and 27) proposed adjacent to, and topographically above, the corrected MHPA (See Section 5.1.1, *Multi-habitat Planning Area*), and Zone 1 would occur entirely within the impact footprint for Project 27. Since not all of Zone 1 could occur within the impact footprint for Project 20, USD will integrate alternate compliance measures for brush management for Project 20 to avoid Zone 1 brush management impacts to the MHPA. The alternative compliance measures require a hardening of the structure and upgraded opening protection of dual glazed/dual tempered windows in addition to integrating California Building Code 7A (Materials and Construction Methods for Exterior Wildfire Exposure) into the future building as permitted in City Land Development Code Section §142.0412(i).

Zone 2 is considered "impact neutral." Impact neutral means not considered an impact (and also not considered acceptable as a mitigation area). Specific design plans for the proposed projects adjacent to the MHPA have not been prepared; however, alternative compliance measures would be integrated, as necessary to avoid Zone 2 brush management in the City-owned MHPA.

Noise

Construction-related noise from such sources as clearing, grading, and construction vehicular traffic would be a temporary impact to wildlife from implementation of the Master Plan Update.

These noise-related impacts would be considered significant, however, if species sensitive to noise are present. This would apply to the coastal California gnatcatcher, as follows—but only in the MHPA. It is assumed herein that Diegan coastal sage scrub in the MHPA within the proposed Master Plan Update boundary and in Tecolote Canyon is occupied by the gnatcatcher, and the gnatcatcher could be affected by construction noise at Project Site Nos. 20, 21, 24, 27, and 28.

The Project, however, would comply with the standard conditions of approval related to Land Use Adjacency Guidelines for noise, which would reduce potential noise-related impacts within the MHPA to a less than significant level. The City has take authorization for the coastal California gnatcatcher (i.e., it is an MSCP Covered Species), so noise impacts to this species outside the MHPA are allowed and no significant impacts are identified.

Public Access

Public access to natural areas can result in impacts such as trails being created and trash being dumped, which can significantly impact special status species and sensitive natural communities and result in a land use within an area adjacent to the MHPA or ESL that would result in adverse edge effects.

The Master Plan Update includes a proposed trail and pedestrian bridge in the western part of the Master Plan Update area outside the MHPA (Project Site Nos. 17 and 19; Figure 5.3-1) that would travel through Diegan coastal sage scrub that supports sensitive plant and animal species (i.e., ESL). There are already unauthorized trails through this community, and it is expected that the proposed, established trail and bridge would minimize the creation of new, unauthorized trails and/or the continued use of existing unauthorized trails. The trail and bridge through on-site vegetation communities are expected to raise awareness, direct access, and reduce indirect impacts from public access, thereby benefitting special status species and sensitive natural communities.

In the northeastern portion of the Master Plan Update area, there are also existing trails that connect USD and Tecolote Canyon (the MHPA) via the MHPA west of Fowler Park and Cunningham Field within the Master Plan Update boundary where the topography is not too steep. The remainder of the Master Plan Update boundary/MHPA interface consists of steep slopes that are vegetated primarily with southern mixed chaparral, and which, thus far, have prevented the creation of other trails into the MHPA and down into Tecolote Canyon. Compliance with the standard conditions of approval related to Land Use Adjacency Guidelines for this issue would ensure indirect public access impacts are prevented/reduced to a less-than-significant level.

The Master Plan Update also includes a provision that any perimeter fencing along Tecolote Canyon be designed and located in coordination with the City Park and Recreation and Landscape departments. The installation of such fencing would further ensure that campus edge effects are minimized. The signage to educate students on the natural history, flora, and fauna of Tecolote Canyon and along all campus trails through or adjacent to natural open space proposed in the

Master Plan Update/design guidelines would be coordinated with the City Park and Recreation Department.

Invasive Plant Species

Invasive, non-native plants can displace native plants; reduce species diversity; increase flammability and fire frequency; change ground and surface water levels; and adversely affect native wildlife dependent on the native flora. Invasive, non-native plants can colonize areas disturbed by construction and potentially spread into adjacent natural communities (i.e., ESL) and the MHPA. Invasive, non-native plants can also spread from landscaping into adjacent natural communities and the MHPA.

The potential spread of invasive, non-native plant species to natural communities (ESL) within the Master Plan Update boundary or into the MHPA from construction activities would be considered a significant impact.

SDMC Landscape Standards (Section 1.3) would be followed during implementation of the Master Plan Update so that no potentially invasive plant species are planted adjacent to the MHPA. Furthermore, the Master Plan Update includes design guidelines for planting disturbed and undeveloped areas adjacent to native areas (i.e., ESL) with compatible San Diego County native or climate adapted plant species that are not on the California Invasive Plant Council's list of invasive species.

Additionally, existing invasive plant species (i.e., pampas grass [*Cortaderia selloana*] and fountain grass [*Pennisetum setaceum*]; Appendix A of Appendix D) would be removed as part of the Master Plan Update on a project-by-project basis as required in by SDMC (Chapter 14, Article 2, Division 4). This code requires that all existing, invasive plant species, including vegetative parts and root systems, be completely removed from the premises when the combination of species type, location, and surrounding environmental conditions provides a means for the species to invade other areas of native plant material that are on or off of the premises. Project Site No. 17, in particular, calls for such landscape enhancements. Therefore, the potential impact from the spread of invasive, non-native species from landscaping would be less-than-significant.

While giant reed, another invasive plant species, is present within the Master Plan Update boundary, it occurs in a single patch in a drainage (Arundo dominated riparian; Figure 5.3-1). In North America, giant reed does not appear to produce viable seed. Rather, the species spreads through vegetative reproduction either from underground rhizome extension or from plant fragments carried downstream that become rooted (California Invasive Plant Council 2015). The vegetation immediately downstream of the giant reed is supports non-native eucalyptus woodland. Therefore, any downstream spread of the species would not impact native plant material on site. The drainage flows into a public storm drain within Morena Boulevard off site that flows into Mission Bay where the plant is not likely to survive, and there is no native plant material (vegetated habitat) to be impacted.

Fugitive Dust

Fugitive dust produced by construction can disperse onto adjacent native vegetation inside and outside the MHPA and significantly affect special status species, sensitive natural communities, and

wetlands A continual cover of dust can reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals dependent on these plants (e.g., seed-eating rodents). Fugitive dust also may make plants unsuitable as habitat for wildlife.

Construction of the Master Plan Update projects would include the use of dust control measures required in SDMC Section 142.0101 et seq. Therefore, construction of the Master Plan Update projects would result in less-than-significant impacts from fugitive dust.

Nesting Birds

According to the MBTA, disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a “take.” Additionally, California Fish and Game Code regulations may require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a Qualified Biologist demonstrate that nests, eggs, or nesting birds will not be disturbed. The Master Plan Update project must comply with all applicable State and federal regulations.

The City considers that any development inside the MHPA, which identifies the occurrence of the following MSCP Covered species, must include an impact avoidance area as follows (City 2012):

- 300 feet of any nesting site of Cooper’s hawk
- 900 feet of any nesting sites of northern harriers (*Circus cyaneus*)
- 4,000 feet of any nesting sites of golden eagles (*Aquila chrysaetos*)
- 300 feet from any occupied burrow of burrowing owls (*Athene cunicularia*)

The Master Plan Update project does not propose any development in the MHPA. However, Project Nos. 20, 21, 24, 27, and 28 may occur within 300 feet of a Cooper’s hawk nest in the MHPA. Indirect impacts to this species’ nesting in the MHPA would be considered significant.

Significance of Impact

Direct Impacts

Sensitive Plant Species

The project would have direct impacts to sensitive plant species including San Diego barrel cactus and ashy spike-moss. The impacts would be less than significant because the species are either of low sensitivity or are MSCP Covered.

Sensitive Wildlife Species

Direct impacts to the coastal California gnatcatcher, Belding’s orange-throated whiptail, Cooper’s hawk, and southern California rufous-crowned sparrow, which would occur outside the MHPA, would be less than significant because these species are MSCP Covered. Direct impacts to the loggerhead shrike and Nuttall’s woodpecker would be less than significant due to these species’ lower levels of sensitivity.

Sensitive Vegetation Communities

Direct impacts to Diegan coastal sage scrub (Table 5.3-4) would be significant because this vegetation community is a Tier II habitat.

Indirect Impacts

While indirect potential impacts to the MHPA from drainage and toxics, lighting, noise, brush management, invasives, and public access could occur, the City requires the implementation of standard conditions of approval to protect the adjacent MHPA in accordance with the MSCP Subarea Plan's Land Use Adjacency Guidelines (refer to Section 5.1, *Land Use*, for more discussion). With compliance with the MHPA Land Use Adjacency Guidelines, indirect impacts would not result. Indirect impacts from fugitive dust would be less than significant. Indirect impacts to nesting Cooper's hawks in the MHPA would be significant.

Mitigation, Monitoring and Reporting

The following mitigation is required and shall be implemented by the University consistent with the City's MSCP Subarea Plan and Biology Guidelines to reduce the Master Plan Update's direct and indirect impacts to sensitive vegetation communities and sensitive wildlife species to below a level of significance.

General Mitigation

Bio-1 Biological Resource Protection

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's MMC section stating that a Project Biologist (Qualified Biologist), as defined in the City's Biology Guidelines (2012), has been retained to implement the biological monitoring program in this mitigation measure. The letter shall include the names and contact information of all persons involved in the biological monitoring of the Master Plan Update area.
- B. **Pre-construction Meeting:** The Qualified Biologist shall attend a pre-construction meeting, discuss the Master Plan Update's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, MSCP, ESL Ordinance, project permit conditions; CEQA; endangered species acts; and/or other local, State or federal requirements.
- D. **Biological Construction Mitigation/Monitoring Exhibit:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit which includes the Biological Documents listed above. In addition, include as applicable: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant

salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The Biological Construction Mitigation/ Monitoring Exhibit shall include a site plan, written and graphic depiction of the Master Plan Update's biological mitigation/monitoring program, and a schedule. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by MMC and referenced in the construction documents.

- E. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of silt and orange construction fencing or equivalent along the limits of disturbance (for Project Site Nos. 17, 19, 20, 22, 23, and 27) and verify compliance with any other conditions as shown on the Biological Construction Mitigation/Monitoring Exhibit. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora and fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to a site.
- F. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the Biological Construction Mitigation/Monitoring Exhibit. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record. The Consultant Site Visit Record shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna on site (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, State or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, State and federal law. The Qualified Biologist shall submit a final Biological Construction Mitigation/Monitoring Exhibit /report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

Sensitive Vegetation Communities

Bio-2 Sensitive Vegetation Communities

Impacts to 0.5 acre of Diegan coastal sage scrub shall be mitigated at a ratio of 1:1 pursuant to Table 3, *Upland Mitigation Ratios*, in the City's Biology Guidelines (City 2012) for impacts outside the MHPA and mitigation inside the MHPA. Mitigation shall be accomplished via payment in to the City's Habitat Acquisition Fund equal to 0.5 acre of habitat.

Sensitive Wildlife Species—Cooper's Hawk

Implementation of Mitigation Measure Bio-3 would satisfy the City's requirement to avoid construction activity within 300 feet of an active Cooper's hawk nest in the MHPA.

Bio-3 Nesting Cooper's Hawks

To avoid impacts to Cooper's hawk, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for this species (February 1 to September 15).

If removal of habitat within 300 feet of the MHPA (Projects 20, 21, 24, 27, and 28) must occur during the breeding season (February 1 to September 15), the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting Cooper's hawk within the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities.

If nesting Cooper's hawk are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan will include the establishment of a 300-foot construction avoidance area that shall be maintained around any active Cooper's hawk nest located inside the MHPA until the nest is no longer active as determined by the Qualified Biologist. The report or plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting Cooper's hawk are not detected during the precon survey, no further mitigation is required.

5.3.3 Impact

Issue 3: Would the proposal result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Thresholds

Based on the City Significance Determination Thresholds (2011), the project would have a significant impact to biological resources if the project would:

- Result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis

Previously Disclosed Biological Resources Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed direct impacts related to southern willow riparian scrub. The analysis concluded that the impacts to this wetland would be significant and mitigated to less-than-significant levels through the enhancement or creation of wetland habitat in the MHPA.

Impacts from the Master Plan Update

Implementation of the Master Plan Update would not directly impact WUS, WS, or City Wetlands. All wetlands would be left in undeveloped land on campus.

Significance of Impact

The project would result in no impacts to WUS, WS, and City Wetlands through direct removal, filling, hydrological interruption, or other means, and no mitigation would be required.

Mitigation, Monitoring and Reporting

No significant impact is identified; no mitigation is required.

5.3.4 Impact

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

Impact Thresholds

Based on the City Significance Determination Thresholds (2011), the project would have a significant impact to biological resources if the project would:

- Substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.

Impact Analysis

Previously Disclosed Biological Resources Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to wildlife movement. The analysis concluded that the development of the campus would not significantly impact wildlife movement.

Impacts from the Master Plan Update

Tecolote Canyon Natural Park, which is a local wildlife corridor north of the Master Plan Update area, is in the MHPA, as is the upper portion of the southern slope of Tecolote Canyon in the Master Plan Update area. While these MHPA lands are part of a large block of native habitat that has the ability to support a diversity of plant and animal life, they do not connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife on a regional scale.

An MHPA Boundary Line Correction is proposed as part of the Master Plan Update to shift 0.61 acre of already-developed land out of the MHPA, which ~~was~~ are permitted uses in the MHPA in accordance with CUP/RPO Permit 92-0239. The remaining vegetated portions of the MHPA within the Master Plan Update area would not be directly impacted, and the Master Plan Update would, therefore, not interfere with the movement of wildlife.

Significance of Impact

The Master Plan Update would not interfere with wildlife movement and would not impede the use of nursery sites.

Mitigation, Monitoring and Reporting

No significant impacts are identified; no mitigation is required.

5.3.5 Impact

Issue 5: Would the proposal result in a conflict with the provisions of an adopted Habitat Conservation Plan (HCP), NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Impact Thresholds

Based on the City Significance Determination Thresholds (2011), the project would have a significant impact to biological resources if the project would:

- Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State HCP, either within the MSCP plan area or in the surrounding region.

Impact Analysis

Previously Disclosed Biological Resources Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to the Draft MSCP and State NCCP. The analysis concluded that development would not pose a significant impact to long-term conservation of biological resources and the biological diversity within the MSCP area, and would not conflict with the criteria of the NCCP Conservation Guidelines.

The City subsequently adopted its MSCP Subarea Plan in 1997. The Subarea Plan provides for the protection of Covered Species including the coastal California gnatcatcher and its habitat, which were previously regulated under the NCCP. An updated analysis is provided below.

Impacts from the Master Plan Update

The Master Plan Update area is partially within the MHPA, which is the preserve area assembled under the MSCP. The Master Plan Update would include an MHPA Boundary Line Correction to remove 0.61 acre of already-developed areas from the MHPA (Figure 5.3-2, *MHPA Boundary Line Corrections*). The already-developed area existed in the MHPA before the preserve boundaries were established in the MSCP Subarea Plan and is permitted in accordance with CUP/RPO Permit 92-0568. Implementation of the Master Plan Update would not directly impact the MHPA and would conform to the MHPA Land Use Adjacency Guidelines to protect the MHPA either through project design or implementing conditions of approval (see Section 5.1, *Land Use*). The Master Plan Update would also conform to Area Specific Management Directives for MSCP Covered Species (coastal California gnatcatcher, Cooper's hawk, and Belding's orange-throated whiptail). Conformance to the guidelines and directives is addressed in Section 6.4.1, *MSCP Consistency*, of the Biological Technical Report (Appendix D). The Master Plan Update would, therefore, not conflict with the provisions of the City's MSCP Subarea Plan.

Significance of Impact

The Master Plan Update would conform to the MSCP Subarea Plan's Land Use Adjacency Guidelines and the Area Specific Management Directives for MSCP Covered Species. Therefore, the project would not conflict with the provisions of the MSCP.

Mitigation, Monitoring and Reporting

No significant impacts are identified; no mitigation is required.

5.3.6 Impact

Issue 6: Would the proposal introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

Issue 7: Would the proposal result in an introduction of invasive species of plants into a natural open space area?

Issue 8: Would the proposal result in a conflict with any local policies or ordinances protecting biological resources?

Impact Thresholds

Based on the City Significance Determination Thresholds (2011), the project would have a significant impact to biological resources if the project would:

- Introduce land uses within an area adjacent to the MHPA that would result in adverse edge effects.
- Introduce invasive species of plants into a natural open space area.
- Conflict with any local policies or ordinances protecting biological resources.

Impact Analysis

Previously Disclosed Biological Resources Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR did not address impacts related to MHPA land use adjacency, invasive plant species, or conflict with local policies/ordinances protecting biological resources because the MSCP Subarea Plan had not yet been adopted. It did, however, include a mitigation measure in accordance with the RPO (Section 101.0462, G.5.g. of the Municipal Code) for significant impacts to sensitive vegetation, plants, and wildlife. That Resource Protection Ordinance portion of the Municipal Code has been replaced by the ESL Regulations (Section 143.0101 of the SDMC). Analysis for these issue areas in accordance with the new regulations is provided below.

Impacts from the Master Plan Update

The impacts discussed in this section generally refer to indirect effects of a project or direct effects that occur outside the proposed area of disturbance. Those impacts may include adverse effects from drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development (as addressed by the City's MHPA Land Use Adjacency Guidelines).

Issues 6 through 8 in relation to the MHPA Land Use Adjacency Guidelines are addressed in Section 5.1, *Land Use*, Issue 3 of this SEIR. Other indirect impacts not addressed by the Land Use Adjacency Guidelines that have potential to indirectly impact the MHPA may include impacts from fugitive dust and impacts to raptor nesting.

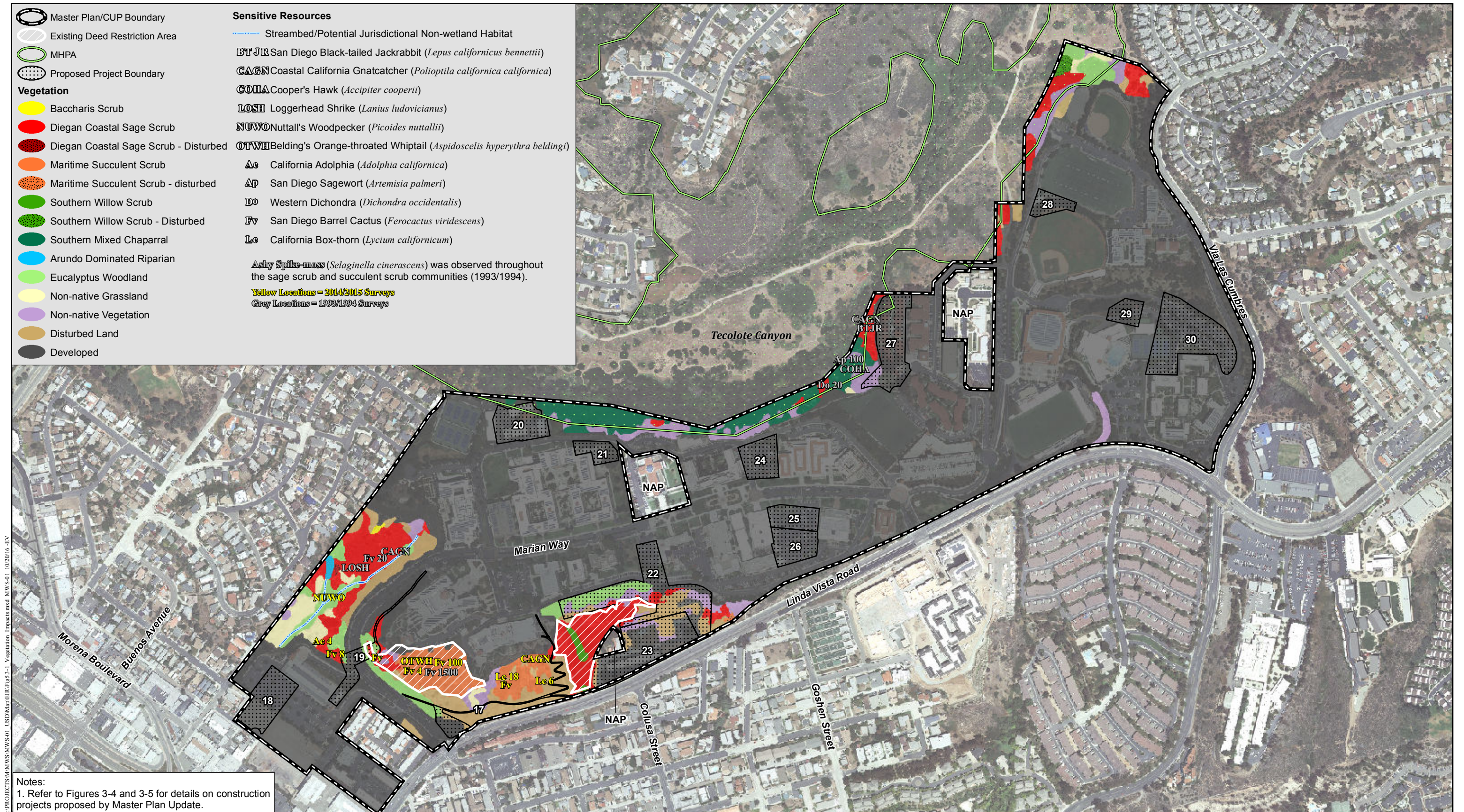
As for conflict with local policies or ordinances protecting biological resources, the City's ESL Regulations require avoidance of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemics (no Narrow Endemic species have been observed in the Master Plan Update area). The regulations also state that wetland impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. Furthermore, the regulations require recordation of a covenant of easement for the remaining undeveloped ESL within the Master Plan Update area. The project would not conflict with the ESL Regulations as addressed above under Issues 1 through 5.

Significance of Impact

As discussed in Section 5.1, *Land Use*, the Master Plan Update would comply with the City's Land Use Adjacency Guidelines related to drainage, toxics, lighting, noise, public access (barriers), invasives, brush management, and grading/land development. Additionally, significant indirect impacts could occur to nesting Cooper's hawks in the MHPA during construction, but those impacts would be mitigated to less-than-significant levels through implementation of Mitigation Measure Bio-3. The project, therefore, would not conflict with the ESL Regulations; less than significant impacts to policies or ordinances protecting biological resources would occur.

Mitigation, Monitoring and Reporting

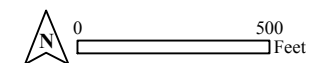
Mitigation Measure Bio-3 shall be implemented for potential impacts to nesting Cooper's hawks. No additional measures are required.

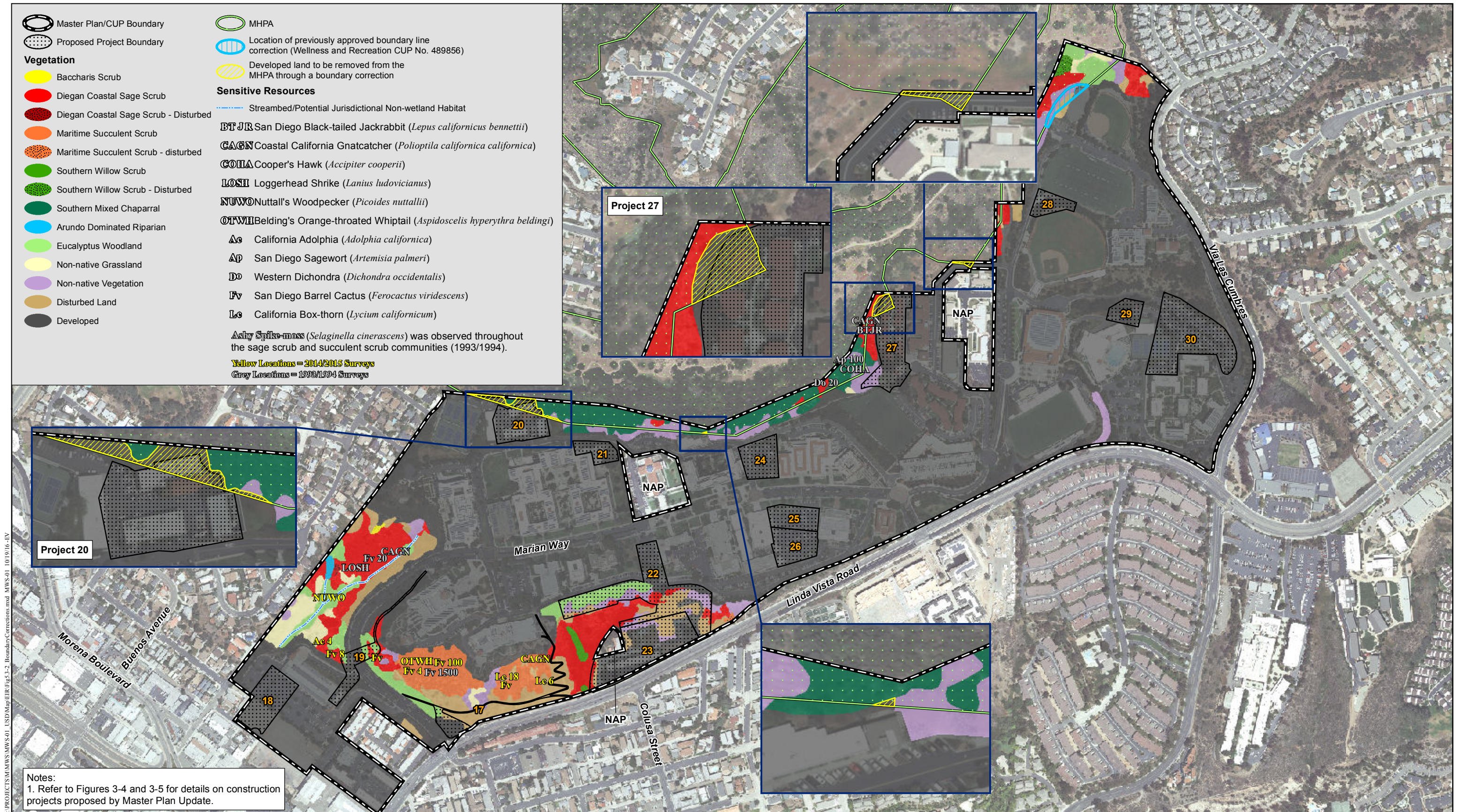


Vegetation and Sensitive Resources/Impacts

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Figure 5.3-1





MHPA Boundary Line Corrections

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.3-2

5.4 Historical Resources

This section assesses modifications to the baseline conditions that have occurred since the certification of the 1996 Master Plan FEIR with regard to historical resources. This section also addresses whether changes to the Master Plan would have the potential to have an adverse effect on such resources. The descriptions and analysis are based on the Archaeological Resource Report Form completed by HELIX and the proposed Project. The results of the listed investigations, surveys, and Native American contacts are summarized below, with related documentation included in Appendix E and confidential records and maps on file at the City Development Services Department (DSD) and the South Coastal Information Center (SCIC). The Master Plan Update is located in Appendix B.

5.4.1 Existing Conditions

Site Conditions

Archaeology

The University of San Diego (USD or University) campus occupies approximately 180 acres of land devoted to university-related uses in the central portion of the City, in the community of Linda Vista. Tecolote Canyon Natural Park forms the northern border of the property; Morena Boulevard is located to the west, Via Las Cumbres borders the campus on the east, and Linda Vista Road is located to the south. Elevations on campus range from approximately 50 feet AMSL to approximately 260 feet AMSL. With the exception of the steep, north-facing slopes along the northern campus border and the slopes on the western end of campus near Marian Way, the majority of the campus is developed and supports university facilities (buildings, parking lots, athletic fields, etc.) and associated landscaping.

Built Environment

USD was founded by Bishop Charles F. Buddy, Diocese of San Diego, and chartered in 1949. The University had temporary quarters for 39 students in the College for Men and 60 students in the School of Law. Mother Rosalie Hill, Society of the Sacred Heart, founded the San Diego College for Women in 1952, opening with 50 students. The Diocese of San Diego built The Immaculata Church and Hughes Administration Center; the latter was eventually purchased by the University. The presence of The Immaculata and sculptural and other iconic elements throughout the campus reflect the University's Catholic identity. The campus site was named Alcalá Park to honor San Diego de Alcalá, a Franciscan lay brother canonized in 1588. The University of Alcalá de Henares was the model for USD's founders, both in architectural style and humanistic philosophy. The main campus has continued to be built in the 16th century Spanish Renaissance architectural style of the Universidad de Alcalá.

In December 1949, the first ground was broken for what would become the USD, located on pueblo land. Catholic Bishop Charles F. Buddy of the Diocese of San Diego and the Mother Superior Vicar Rosalie Hill of the San Francisco College for Women selected the site for two colleges: the College for Men and College for Women. The latter opened with the first class in 1952. In 1967, a process to combine the two schools began. By 1970-1971 the merger had taken place. USD has continued as a

secular institution based on the Catholic traditions. At that time, the University became an independent University-no longer a Diocesan institution. Since 1952, the University has added new structures and roads, and made improvements within its 180 acres.

Study Methodology

Archaeology

A records search conducted over a one-mile radius surrounding the campus and a review of in-house records search data obtained from the SCIC for previous projects in the vicinity were undertaken. The Native American Heritage Commission (NAHC) was contacted on April 30, 2015 for a Sacred Lands File search and list of tribal contacts. Letters were sent to the contacts listed by the NAHC on May 18, 2015. Historic maps and aerial photographs were reviewed to assess the potential for historic archaeological resources.

A field survey was undertaken to determine potential archaeological resources present within the campus. The pedestrian survey was conducted on May 22, 2015 by a HELIX archaeological field director and a Native American monitor. There was very little undeveloped space to survey, due to the extent of buildings, hardscape, and landscape on the campus. The undeveloped areas and all areas devoid of vegetation were carefully inspected for archaeological resources.

The least modified areas were steep slopes located in the western half of the property. These areas were walked in 10-meter parallel transects. All other areas of campus, such as sports fields, planting beds, maintenance yards, manufactured slopes, canyon slopes, and any other area devoid of vegetation, were examined carefully for cultural constituents.

Built Environment

No specific historic structures evaluation was undertaken for the current analysis due to the long-term nature of the Project implementation; however, an inventory of all structures on campus, including their ages and photographs of their facades, was provided by USD and is contained in the Master Plan Update (Appendix B). In addition, a review of historic maps and aerial photographs was conducted.

Survey Results

Records Search

A total of 173 reports have been completed within the one-mile search radius. Of these, five reports covered the campus (Brandes 1996; Carmack and Hansen 2006; City of San Diego 1996b; Cupples 1975; Polan 1981). None of these reports recorded any archaeological resources.

The record search and review of in-house records showed that numerous resources, including archaeological sites and historic addresses, are known within the one-mile records search radius of the campus. A total of 89 cultural resources are recorded within the search radius. Many of the sites are located in Old Town, a significant historic area of San Diego, and many others are along the San Diego River; both areas are less than one mile south of the USD campus. One site is recorded to the west, near Mission Bay. Five sites are located north of the Project area, four of which are within

Tecolote Canyon. One of these resources is mapped as partially within the USD property, as described below.

Site CA-SDI-11021 (P-37-011021) is mapped as extending a short distance into the USD campus (site record update prepared in 2012). The site consists of a shell scatter with two areas of concentration and no associated artifacts or features. The site is described as located along an access road in Tecolote Canyon and is mainly mapped outside the Project area. The southernmost part of the northeastern concentration, however, is mapped as extending into the northernmost corner of the Project area. The site record noted that the shell might be a natural deposit, but this remains uncertain since no subsurface testing has been conducted.

The map of historic addresses provided by the SCIC indicates that 153 historic addresses are within the search radius, with one resource located just south of Linda Vista Road from the campus. The building at 5961 Linda Vista Road is listed as a rehabilitation of a Kirby Johnson property; however, there is no report associated with this address on file, and no further information is available.

Sacred Lands File Search and Native American Correspondence

The results of the Sacred Lands File search showed that there was no record of Native American cultural resources within the Project area as of May 14, 2015. Letters regarding the Project were sent on May 18, 2015 to the tribal contacts identified by the NAHC. The Viejas Band of Kumeyaay Indians (Viejas) responded that the Project area has cultural ties to Viejas, and they requested that a Kumeyaay Cultural Monitor be present during all ground disturbing activities to inform the Band of the inadvertent discovery of cultural material.

Historic Maps and Aerial Photographs

One building with a road/driveway leading to it from Linda Vista Road is shown within the Project area on the 1903 USGS 15' La Jolla quadrangle. This same building appears on the 1930 15' USGS La Jolla map as well. The 1943 USGS 7.5' La Jolla quadrangle shows two buildings on the north side of Linda Vista Road, one of which seems to be the same building shown on the earlier maps; the second building is just west of it. The 1953 7.5' USGS map shows "San Diego University," and the earlier buildings no longer appear. Although a building is present on both the 1903 and 1930 USGS maps, no buildings are visible in that area on the 1928 tax factor aerial photograph. Buildings on the south side of Linda Vista Road (outside the Project area) that are shown on the USGS topographic maps are visible on the 1928 aerial photograph.

A review of historic aerial photographs of the Project site shows that most of the campus remained undeveloped in 1954. The Sacred Heart Hall, Founders Hall, and Camino Hall complex that held the College for Women, two tennis courts northwest of this, and another building (likely the present Hughes Administration Center) to the southeast constituted the only development. The southeastern portion of the Project area appears to have contained a housing development that was replaced by University buildings by 1964. Development of the USD property continued steadily over the next three decades with a boom in the 1980s; however, portions of the southwest corner and northern perimeter appear to never have contained buildings.

There are currently over 20 buildings and structures on campus that are at least 45 years old, which makes them potentially historic pursuant to the City of San Diego Significance Determination

Thresholds (City 2011). More could become potentially historic over the lifetime of the Project (i.e., 20 years). Several potentially historic buildings are adjacent to project sites proposed under the Project. One potentially historic building is within the footprint of Project Site No. 20, located within the existing Facilities Management Complex).

5.4.2 Impact

Issue 1: Would the proposal result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?

Impact Thresholds

Based on the current City of San Diego's Significance Determination Thresholds (2011), historical (built environment) resource impacts may be significant if the Project would affect any of the following:

- A resource listed in, eligible, or potentially eligible for the National Register of Historic Places.
- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC, Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the Lead Agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC, Section 5024.1), including the following criteria:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, information important in prehistory or history.

The determination of significance of impacts on historical (built environment) resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines. Section 15064.5 clarifies the

definition of a substantial adverse change in the significance of a historical resource as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” As CEQA Lead Agency, the City has determined that historic resources can include buildings, structures, objects, archaeological sites, districts or landscapes that are typically over 45 years old, regardless of whether they have been altered or continue to be used.

Impact Analysis

Previously Disclosed Cultural (Historic) Resources Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential for significant impacts to built structural resources within the Master Plan area. At that time, no structures were found during the survey that met criteria for categorization as “historic.” Relative to the historic analysis, it was concluded that none of the USD buildings were over 45 years of age, and that the property was not associated with significant historical events or persons, did not represent the work of an artistic master, and would not be likely to yield important information on prehistory or history.

Impacts from Master Plan Update

The following discussion focuses on the potential historic resources impacts associated with revisions to the Project, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Historic Structures (Built Environment)

As summarized in Table 5.4-1, *Construction Dates, Buildings Within or Adjacent to Master Plan Update Project Sites*, several buildings that are over 45 years old are within or adjacent to projects proposed by the Project. These buildings include the Facilities Management Complex (Project Site No. 20), Founders Hall (Project Site No. 21), Hughes Center (Project Site No. 22), 5701 Josephine Street (Project Site No. 23), Maher Hall (Project Site No. 24), and Warren Hall (Project Site No. 25). In several cases (Founders Hall, Hughes Center, and 5701 Josephine Street), the project would have no direct impact to the existing building. In two other instances (Maher Hall and Warren Hall), connections to the existing buildings may be required. The Facilities Management Complex includes at least two buildings that are over 45 years old. Although no specific plan has been developed for this project site, the University is considering use of this space for academic/ administrative/support facilities, and future plans may propose other specific uses.

Buildings constructed as late as the 1980s would reach the 45-year threshold under the life of this Project. However, precise designs and parameters of future Master Plan Update projects that would affect any of these potentially historic buildings are not known at this time. In accordance with the Historic Resources Regulations (SDMC Section 143.0210), historic review is not completed until submittal of construction-level designs are prepared. Pending these individual construction designs, however, a potential for significant impacts to structures is identified and historic evaluation would be undertaken on a project-specific basis as individual projects are designed and implemented (see *Mitigation, Monitoring and Reporting*, below).

**Table 5.4-1
CONSTRUCTION DATES, BUILDINGS WITHIN OR ADJACENT TO
MASTER PLAN UPDATE PROJECT SITES**

Site No.	Adjacent Building	Date of Construction*	Comments
17	n/a	n/a	No impacts to existing or adjacent buildings
18	West Parking Structure	2002	Project may require connection to adjacent building
19	West Parking Structure	2002	Project may require connection to adjacent building
20	Facilities Management Complex	1951	Existing buildings may be replaced by project
21	Founders Hall	1951	Adjacent building not affected by project
22	Hahn School	1978	Adjacent building not affected by project
22	Hughes Center	1952	Adjacent building not affected by project
23	5701 Josephine Street -- not a part of Master Plan Area	By 1964	Adjacent building not affected by project
24	Maher Hall	1954	Project may require connection to adjacent building
24	Hahn Center	1986	Project may require connection to adjacent building
25	Warren Hall	1953	Project may require connection to adjacent building
25	Pardee Research Center	1953	Project may require connection to adjacent building
26	Loma Hall	1992	Project may require connection to adjacent building
26	Warren Hall	1953	Project may require connection to adjacent building
26	Pardee Research Center	1988	Project may require connection to adjacent building
27	Missions A	1979	Existing building to be replaced by project
27	Mission Crossroads	1979	Existing building to be replaced by project
27	San Buenaventura	2007	Adjacent building not affected by project
28	n/a	n/a	No impacts to existing or adjacent buildings
29	n/a	n/a	No impacts to existing or adjacent buildings
30	Alcalá Vista Apartments	1987	Adjacent building not affected by project
30	East Tennis Courts	n/a	Existing facilities to be replaced by project
30	Weight Room	1986	Existing building to be replaced by project

Source: MW Steele 2016

*Construction dates from Brandes (1996), building list provided by architect, and historic aerial photographs

Significance of Impact

There are several buildings of historic age on campus which are within or adjacent to Master Plan Update project sites. In addition, other campus buildings may reach an age of 45 or more years within the horizon of the Project, which would then qualify them as potentially historic resources.

Potentially significant impacts are identified, pending identification of exact buildings to be affected and the degree to which changes would occur as part of future actions and more detailed design.

Mitigation, Monitoring and Reporting

The current study surveyed the University site consistent with MM IV.F-1 of the 1996 Master Plan FEIR. Based on that survey and the negative results, the following mitigation measures would avoid or reduce potentially significant impacts to historic structures to below a level of significance.

Hist/Arch-1 The following measure shall be implemented for USD Master Plan Update project sites impacting structures 45 years of age or older at the time the construction permit, including any demolition permit, the project application is submitted:

I. Prior to Permit Issuance

For any future projects that propose additions or modifications to structures or landscape features 45 years old or older, the structure or landscape feature shall be reviewed by qualified historic staff at the City of San Diego to determine whether or not the resource may meet one or more criteria for historic designation and therefore be considered potentially historic. If the structure or landscape feature being modified or removed by the construction is not assessed as potentially historic, the project shall proceed and no further mitigation will be required. If the evaluation determines that the project could affect potentially significant historic resources, then the following two listed items shall apply:

1. If the evaluation determines that the project is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, then the potential historic significance will be documented and the project may be found to be in Substantial Conformance with the Master Plan and SEIR.
2. If the evaluation determines that the project is not consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, the project shall be redesigned to be consistent with the Standards, or a historic report that evaluates the building or landscape feature's integrity and eligibility under all designation criteria shall be completed and forwarded to the Historical Resources Board for review and consideration.

5.4.3 Impact

Issue 2: Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?

Issue 3: Would the proposal result in the disturbance of any human remains, including those interred outside of formal cemeteries?

Impact Thresholds

Based on the current City of San Diego's Significance Determination Thresholds (2011), archaeological resource impacts may be significant if the Project would affect any of the following:

- A resource listed in, eligible, or potentially eligible for the National Register of Historic Places.
- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources (PRC, Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the Lead Agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (PRC, Section 5024.1), including the following criteria:
 - a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - b. Is associated with the lives of persons important in our past;
 - c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
 - d. Has yielded, or may be likely to yield, information important in prehistory or history.
- An archaeological site consisting of at least three associated artifacts/ecofacts (within a 40-square meter area) or a single feature.
- A "traditional cultural property," defined to include any locale that:

...has been, and often continues to be of religious, mythological, cultural, economic, and/or social importance to an identified ethnic group. This includes sacred areas where religious ceremonies have been or currently are practiced or which are central to a group's origins as a people. Also included are areas where plants or other materials have been or currently are gathered for food, medicine or other economic purposes...Traditional cultural properties may also include neighborhoods which have been modified over time by ethnic or folk group use in such a way that the physical and cultural manifestations of the ethnic or folk culture are still distinguishable today. Cultural expressions shared within familial, ethnic, occupational, or religious groups include but are not limited to; technical skill, language, music, oral history, ritual, pageantry, and handicraft traditions which are learned orally, by limitation or in performance, and are generally maintained without benefit of formal instruction or institutional direction. Physical features may include distinctive landscape and settlement patterns, architectural topologies, materials and methods of construction, and ornamental detail.

A site would be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

The determination of significance of impacts on historical and unique archaeological resources is based on the criteria found in Section 15064.5 of the State CEQA Guidelines. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resource as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” As CEQA Lead Agency, the City has determined that historic resources can include buildings, structures, objects, archaeological sites, districts, or landscapes that are typically over 45 years old, regardless of whether they have been altered or continue to be used.

Impact Analysis

Previously Disclosed Cultural Resources Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential for significant impacts to archaeological resources within the Master Plan area. The report cleared all USD areas but three – which were physically inaccessible due to dense vegetative cover and slope -- for archaeological resources. A mitigation measure was identified for future work (MM IV.F-1) that would address focused survey of the three areas left unsurveyed at the time of the 1996 Master Plan FEIR environmental evaluation and require discretionary review in accordance with City guidelines when specific development plans were identified. That mitigation measure was satisfied as part of the cultural resources evaluation for the Project.

Impacts from Master Plan Update

The following discussion focuses on the potential archaeological resources impacts associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Cultural Resources (Archaeology)

Fossilized shell was observed during the May 2015 survey within an undeveloped area east of the West Campus entrance kiosk and elsewhere throughout the western half of the campus in association with construction activities or erosional weathering patterns. Due to its fossilized state, the shell is not considered cultural in nature.

As noted above, one of the two shell area concentrations of CA-SDI-11021 is mapped as extending a short distance into the campus. Although ground visibility was poor in this area, due to vegetation, no cultural material was observed in the mapped area of CA-SDI-11021 during the May 2015 survey.

It is noted that the shell scatter at CA-SDI-11021 has not been tested to assess its significance. The original site record, however, indicates that the shell might not be cultural in nature. No other previously recorded sites are located within the property, and no new resources were identified

during project survey. In addition, the area in which the site is mapped is outside any Master Plan Update project sites. Therefore, no impacts to this recorded resource would occur.

No known archaeological materials are located within the campus as a whole, and within the potential impact areas of the current Project. Therefore, no impacts to known cultural resources are anticipated.

Given the cultural sensitivity of the general area, the poor ground visibility during the survey, and the request by Viejas for a Native American monitor, there is the potential for unknown cultural resources to be present (i.e., either hidden by isolated areas of dense vegetation or subsurface). A potential for unanticipated impacts exists, and it is therefore recommended that ground-disturbing activities (brushing/grubbing, grading, trenching, excavation) be monitored by an archaeologist and a Native American monitor.

Significance of Impact

No known archaeological materials are located within the Project site as a whole. The one site that may extend onto the Project from the north was not relocated and is not within the potential impact areas of the project sites. Therefore, impacts to known cultural resources would be less than significant.

Given the cultural sensitivity of the general area, the poor ground visibility during the survey, and the request by Viejas for a Native American monitor, it is possible that there are unknown resources within focused areas of the Project. As a result, a conservative assessment is being made that there may be impacts to presently unknown resources and, as such, potentially significant impacts to cultural resources are assessed.

Mitigation, Monitoring and Reporting

The current study surveyed the University site consistent with MM IV.F-1 of the 1996 Master Plan FEIR. Based on that survey and the negative results, the following mitigation measures would avoid or reduce potentially significant impacts to unknown subsurface resources to below a level of significance. If observation of the initial grading activities indicates there is no potential for cultural resources, monitoring would be discontinued. Termination of monitoring would be determined by agreement among the archaeological principal investigator, the Native American monitor, and City Mitigation Monitoring Coordinator (MMC) staff.

Hist/Arch-2 The following measure shall be implemented for USD Master Plan Update project sites relative to unknown cultural resources:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for

Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification Have Been Submitted to ADD

1. The applicant shall submit a letter of verification to MMC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, RE, Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
- b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.**
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSVs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California PRC (Section 5097.98) and State Health and Safety Code (Section 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the NAHC within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.

5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC Section 5097.94(k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
 - c. In order to protect these sites, the Landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC, Section 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.

- a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.
- b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III-During Construction, and IV-Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
- c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III-During Construction, and IV-Discovery of Human Remains shall be followed.
- d. The PI shall immediately contact MMC, or by 8 AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.**
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation: The PI shall be responsible for recording (on the appropriate State of California

Department of Parks and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing, and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV–Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

5.5 Air Quality

This section assesses modifications to the baseline conditions that have occurred since the certification of the previous 1996 Master Plan FEIR with regard to air quality and addresses whether changes to the Project would have the potential to have an adverse effect on air quality. This section is based on the information and analysis presented in the Air Quality Technical Report for the Project, dated December 2016 (HELIX 2016). The technical report is included in its entirety as Appendix F.

5.5.1 Existing Conditions

Climate and Meteorology

The climate in southern California, including the San Diego Air Basin (SDAB), is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. Areas within 30 miles of the coast experience moderate temperatures and comfortable humidity.

The predominant wind direction in the vicinity of the University is from the west, and the average wind speed is approximately five mph (Iowa Environmental Mesonet [IEM] 2015). The annual average maximum temperature in the Project area is approximately 72°F, and the annual average minimum temperature is approximately 54°F. Total precipitation in the Project area averages approximately 10.8 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer (Western Regional Climate Center [WRCC] 2015; Melissadata.com 2016).

Due to its climate, the SDAB experiences frequent temperature inversions (temperature increases as altitude increases, which is the opposite of general patterns). Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and nitrogen dioxide (NO₂) react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO₂ emissions. High NO₂ levels usually occur during autumn or winter, on days with summer-like conditions.

Regulatory Framework

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the general public. In general, air pollutants include the following compounds:

- Ozone (O₃)
- Reactive organic gases (ROGs) or volatile organic compounds (VOCs)

- Carbon monoxide (CO)
- Nitrogen dioxide (NO₂)
- Respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5})
- Sulfur dioxide (SO₂)
- Lead (Pb)

The following specific descriptions of health effects for each of the air pollutants potentially associated with Project construction and operations are based on information provided by the USEPA (2007) and the California Air Resources Board (CARB; 2009).

Ozone. Ozone is considered a photochemical oxidant, which is a chemical that is formed when VOCs and nitrogen oxides (NO_x), both by-products of fuel combustion, react in the presence of ultraviolet light. Ozone is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk from exposure to ozone.

Reactive Organic Gases. ROGs (also known as VOCs) are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of ROGs. Other sources of ROGs include evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROGs, but rather by reactions of ROGs to form secondary pollutants such as ozone.

Carbon Monoxide. CO is a product of fuel combustion. CO is an odorless, colorless gas. It affects red blood cells in the body by binding to hemoglobin and reducing the amount of oxygen that can be carried to the body's organs and tissues. CO can cause health effects to those with cardiovascular disease and can also affect mental alertness and vision.

Nitrogen Dioxide. NO₂ is also a by-product of fuel combustion and is formed both directly as a product of combustion and in the atmosphere through the reaction of nitrogen oxide (NO) with oxygen. NO₂ is a respiratory irritant and may affect those with existing respiratory illness, including asthma. NO₂ can also increase the risk of respiratory illness.

Respirable Particulate Matter and Fine Particulate Matter. Respirable particulate matter (PM₁₀) refers to particulate matter with an aerodynamic diameter of 10 microns or less. Fine particulate matter (PM_{2.5}) refers to particulate matter with an aerodynamic diameter of 2.5 microns or less. Particulate matter in these size ranges have been determined to have the potential to lodge in the lungs and contribute to respiratory problems. PM₁₀ and PM_{2.5} arise from a variety of sources, including road dust, diesel exhaust, fuel combustion, tire and brake wear, construction operations, and windblown dust. PM₁₀ and PM_{2.5} can increase susceptibility to respiratory infections and can aggravate existing respiratory diseases such as asthma and chronic bronchitis. PM_{2.5} is considered to have the potential to lodge deeper in the lungs. Diesel particulate matter (DPM) is classified a carcinogen by CARB.

Sulfur dioxide. SO₂ is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil and by other industrial processes. Generally, the highest

concentrations of SO₂ are found near large industrial sources. SO₂ is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO₂ can cause respiratory illness and aggravate existing cardiovascular disease.

Lead. Lead (Pb) in the atmosphere occurs as particulate matter. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Lead has the potential to cause gastrointestinal, central nervous system, kidney and blood diseases upon prolonged exposure. Lead is also classified as a probable human carcinogen. Because emissions of lead are found only in projects that are permitted by Air Pollution Control District (APCD), lead is not an air quality of concern for the Project.

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. The USEPA is responsible for enforcing the Federal Clean Air Act (CAA) of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish National Ambient Air Quality Standards (NAAQS), which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for several criteria pollutants, which are introduced above. Table 5.5-1, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

The CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards. CARB has established the more stringent California Ambient Air Quality Standards (CAAQS) for the six criteria pollutants through the California Clean Air Act of 1988 (CCAA), and also has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide (H₂S), vinyl chloride, and visibility-reducing particles. Areas that do not meet the NAAQS or the CAAQS for a particular pollutant are considered to be “nonattainment areas” for that pollutant. On April 30, 2012, SDAB was classified as a marginal nonattainment area for the 8-hour NAAQS for ozone. The SDAB is an attainment area under the NAAQS for all other criteria pollutants. The SDAB currently falls under a national “maintenance plan” for CO, following a 1998 redesignation as a CO attainment area (APCD 2010). The SDAB is currently classified as a nonattainment area under the CAAQS for ozone (serious nonattainment), PM₁₀, and PM_{2.5}.

Table 5.5-1 AMBIENT AIR QUALITY STANDARDS				
Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary ^a	Secondary ^b
O ₃	1 Hour	0.09 ppm (180 µg/m ³)	–	–
	8 Hour	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	Same as Primary
PM ₁₀	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary
	AAM	20 µg/m ³	–	Same as Primary
PM _{2.5}	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	12.0 µg/m ³	Same as Primary
CO	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	–
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
NO ₂	AAM	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m ³)	0.100 ppm (188 µg/m ³)	–
SO ₂	24 Hour	0.04 ppm (105 µg/m ³)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	–
Lead	30-day Avg.	1.5 µg/m ³	–	–
	Calendar Quarter	–	1.5 µg/m ³	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m ³	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	
Sulfates	24 Hour	25 µg/m ³		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m ³)		

Source: CARB 2015c.

^a National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

^b National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

O₃: ozone; ppm: parts per million; µg/m³: micrograms per cubic meter; PM₁₀: large particulate matter;

AAM: Annual Arithmetic Mean; PM_{2.5}: fine particulate matter; CO: carbon monoxide; mg/m³: milligrams per cubic meter;

NO₂: nitrogen dioxide; SO₂: sulfur dioxide; km: kilometer; –: No Standard.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

The APCD is the local agency responsible for the administration and enforcement of air quality regulations in San Diego County. The APCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County's RAQS was initially adopted in 1991, and is updated on a triennial basis. The most recent version of the RAQS was adopted by the APCD in 2009. The local RAQS, in combination with those from all other California nonattainment areas with serious (or

worse) air quality problems, is submitted to CARB, which develops the California SIP. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The current federal and state attainment status for San Diego County is presented in Table 5.5-2, *Federal and State Air Quality Designation for the San Diego Air Basin*.

Table 5.5-2 FEDERAL AND STATE AIR QUALITY DESIGNATION FOR THE SAN DIEGO AIR BASIN		
Criteria Pollutant	Federal Designation	State Designation
O ₃ (1-hour)	(No federal standard)	Nonattainment
O ₃ (8-hour)	Marginal Nonattainment	Nonattainment
CO	Maintenance	Attainment
PM ₁₀	Unclassifiable	Nonattainment
PM _{2.5}	Attainment	Nonattainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassifiable
Visibility	(No federal standard)	Unclassifiable

Source: CARB 2015a

Toxic Air Contaminants

Toxic air contaminants (TACs) are a category of air pollutants that have been shown to have an impact on human health but are not classified as criteria pollutants. Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. Air toxics are generated by a number of sources, including stationary ones such as dry cleaners, gas stations, combustion sources, and laboratories; mobile ones such as automobiles; and area sources such as farms, landfills, construction sites, and residential areas. Adverse health effects of TACs can be carcinogenic (cancer-causing), short-term (acute) noncarcinogenic, and long-term (chronic) noncarcinogenic. Public exposure to TACs is a significant environmental health issue in California.

California's air toxics control program began in 1983 with the passage of the Toxic Air Contaminant Identification and Control Act, better known as Assembly Bill (AB) 1807 or the Tanner Bill. When a compound becomes listed as a TAC under the Tanner process, the CARB normally establishes minimum statewide emission control measures to be adopted by local APCDs. Later legislative amendments (AB 2728) required the CARB to incorporate all 189 federal hazardous air pollutants (HAPs) into the state list of TACs.

Supplementing the Tanner process, AB 2588 – the Air Toxics “Hot Spots” Information and Assessment Act of 1987 – currently regulates over 600 air compounds, including all of the Tanner-designated TACs. Under AB 2588, specified facilities must quantify emissions of regulated air toxics and report them to the local APCD. If the APCD determines that a potentially significant public health risk is posed by a given facility, the facility is required to perform a health risk assessment (HRA) and notify the public in the affected area if the calculated risks exceed specified criteria.

On August 27, 1998, CARB formally identified PM emitted in both gaseous and particulate forms by diesel-fueled engines as a TAC. The particles emitted by diesel engines are coated with chemicals, many of which have been identified by the USEPA as HAPs and by CARB as TACs. CARB's Scientific Advisory Committee has recommended a unit risk factor (URF) of 300 in 1 million over a 70-year exposure period for diesel particulate. In September 2000, the CARB approved the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (Diesel Risk Reduction Plan; CARB 2000). The Diesel Risk Reduction Plan outlined a comprehensive and ambitious program that included the development of numerous new control measures over the next several years aimed at substantially reducing emissions from new and existing on-road vehicles (e.g., heavy-duty trucks and buses), off-road equipment (e.g., graders, tractors, forklifts, sweepers, and boats), portable equipment (e.g., pumps), and stationary engines (e.g., stand-by power generators). These requirements are now in force on a state-wide basis.

Existing Air Quality

Attainment Designations

Attainment designations are discussed above and provided in Table 5.5-2. The SDAB is classified as a marginal nonattainment area for the 8-hour NAAQS for ozone. The SDAB currently falls under a national "maintenance plan" for CO. The SDAB is currently classified as a nonattainment area under the CAAQS for ozone (serious nonattainment), PM₁₀ and PM_{2.5}. The SDAB is an attainment area for all other criteria pollutants.

Monitored Air Quality

The APCD operates a network of ambient air monitoring stations throughout the County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The nearest ambient monitoring stations to the University is the San Diego – Beardsley Street monitoring station located at 1110 Beardsley Street, approximately 10 miles south of the campus. Air quality data for this monitoring station between the years 2012 and 2014 (the most current available data) are shown in Table 5.5-3, *Air Quality Monitoring Data*.

Monitoring data at the San Diego – Beardsley Street station has had acceptable levels of the criteria air pollutants CO (8-hour), ozone (1-hour), and NO₂ for 2012 to 2014. The state 8-hour ozone standard was violated twice in 2014. The state 24-hour PM₁₀ standard was violated once in 2013. The federal PM_{2.5} standard was violated once in each of the years sampled.

Table 5.5-3 AIR QUALITY MONITORING DATA			
Pollutant	2012	2013	2014
Ozone (O₃)			
Maximum 1-hour concentration (ppm)	0.071	0.063	0.093
Days above 1-hour state standard (>0.09 ppm)	0	0	0
Maximum 8-hour concentration (ppm)	0.065	0.053	0.073
Days above 8-hour state standard (>0.070 ppm)	0	0	2
Days above 8-hour federal standard (>0.075 ppm)	0	0	0
Carbon Monoxide (CO)			
Maximum 8-hour concentration (ppm)	1.81	*	*
Days above state or federal standard (>9.0 ppm)	0	0	0
Maximum 1-hour concentration (ppm)	3.2	3.5	*
Days above state standard (20 ppm)	0	0	0
Days above federal standard (35 ppm)	0	0	0
Respirable Particulate Matter (PM₁₀)			
Maximum 24-hour concentration (µg/m ³)	47.0	92.0	41.0
Days above state standard (>50 µg/m ³)	0	1	0
Days above federal standard (>150 µg/m ³)	0	0	0
Fine Particulate Matter (PM_{2.5})			
Maximum 24-hour concentration (µg/m ³)	39.8	37.4	36.7
Days above federal standard (>35 µg/m ³)	1	1	1
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration (ppm)	0.065	0.072	0.075
Days above state 1-hour standard (0.18 ppm)	0	0	0

Source: CARB 2015b.

ppm = parts per million, µg/m³ = micrograms per cubic meter

*Insufficient data available

5.5.2 Impact

Issue 1: Would the proposal result in a conflict with or obstruct implementation of the applicable air quality plan?

Impact Thresholds

The APCD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the RAQS and SIP, prepared by the APCD for the region. Both the RAQS and SIP are based on SANDAG population projections, as well as land use designations and population projections included in general plans for those communities located within the County. Population growth is typically associated with the construction of residential units or large employment centers.

A project would be inconsistent with the RAQS/SIP if it results in population and/or employment growth that exceed growth estimates for the area.

Impact Analysis

Previously Disclosed Land Use Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR concluded that the USD Master Plan would not result in a significant impact on regional or local air quality, although construction-related fugitive dust emissions were predicted to be significant but mitigable and emissions of criteria pollutants would be cumulatively significant and unmitigable because of the non-attainment status of the SDAB and inability of one project to control emissions in the region. Several mitigation measures (i.e., Measure IV.B-1) were recommended to reduce project-related dust emissions below a level of significance.

Impacts from the Master Plan Update

The following discussion focuses on the potential air quality effects associated with the revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Consistency with Applicable Air Quality Plan

The Project would accommodate the increase in student enrollment at campus by renovating and building new classrooms, administrative and support facilities, housing and other university-related uses. The Project provides a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 FTE students to 10,000 FTE over the next 20 years. The Project would construct new facilities to accommodate additional student population and would contribute to transportation-generated air pollutants. However, this would generally be in response to regional population growth forecasts, and the resulting county-wide housing and job demand. According to the SANDAG growth projections analysis, students are counted as part of the residential forecast in the categories of age, gender, and ethnicity. Preliminary growth forecasts by SANDAG show an increase of 31,832 residents by year 2035 and of 36,198 residents by year 2050 in the San Diego region (SANDAG 2010).

The RAQS/SIP relies on the same information from the SANDAG growth forecast to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. It should be noted that the current population in San Diego County has not kept up with the projected population that was used as the basis for the RAQS/SIP. Also, it is important to note that the Project would not increase population directly to the area; the campus would respond to regional growth. Because of the growth in the number of households forecasted in the SANDAG's growth forecast analysis, the increases in student enrollment at the USD campus would be accommodated in the regional population forecast used to prepare the RAQS/SIP.

Significance of Impact

The Project would not conflict with the applicable air quality plan because it would not generate population growth beyond the levels assumed for the region nor would it conflict with any population projections for the region. In addition, the Project would comply with all existing and new rules and regulations as they are implemented by the APCD, CARB, and/or USEPA related to

emissions generated during construction. The Project would be consistent with the RAQS/SIP and no impacts would occur.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.5.3 Impact

Issue 2: Would the proposal result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the proposal exceed 100 pounds per day of particulate matter (PM) (dust)?

Impact Thresholds

The Project would generate criteria pollutants in the short term during construction and the long term during operation. To determine whether a project would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, a project's emissions are evaluated based on the quantitative emission thresholds established by the APCD as presented in Table 5.5-4, *Screening-Level Thresholds for Air Quality Impact Analysis*.

Table 5.5-4 SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS			
Pollutant	Total Emissions		
Construction Emissions (pounds/day)			
Respirable Particulate Matter (PM ₁₀)	100		
Fine Particulate Matter (PM _{2.5})	55		
Oxides of Nitrogen (NO _x)	250		
Oxides of Sulfur (SO _x)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	75		
Operational Emissions			
	Pounds per Hour	Pounds per Day	Tons per Year
Respirable Particulate Matter (PM ₁₀)	---	100	15
Fine Particulate Matter (PM _{2.5})	---	55	10
Oxides of Nitrogen (NO _x)	25	250	40
Oxides of Sulfur (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75	13.7

Table 5.5-4 (cont.) SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS	
Pollutant	Total Emissions
Toxic Air Contaminant Emissions	
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT
Non-Cancer Hazard	1.0

Source: APCD Rule 20.2 and Rule 1210

T-BACT = Toxics-Best Available Control Technology

Impact Analysis

Previously Disclosed Land Use Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR concluded that implementation of construction under the USD Master Plan would result in fugitive dust emissions higher than the stated thresholds and significant and mitigable impacts would arise. Several mitigation measures (i.e., Measure IV.B-1) were recommended to reduce project-related dust emissions below a level of significance. The 1996 Master Plan FEIR further concluded that emissions of criteria pollutants would be cumulatively significant and unmitigable because of the non-attainment status of the SDAB and inability of one project to control emissions in the whole region.

Impacts from the Master Plan Update

The following discussion focuses on the potential air quality effects associated with the revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts. Cumulative impacts are addressed in Section 6.0.

Construction

As detailed in the Air Quality Technical Report prepared for the Project, peak daily criteria pollutant emissions were estimated by modeling the most intense construction project included in the Project. The student housing expansion project (i.e., Project Site No. 23) fronting Linda Vista Road includes the demolition of approximately 28,500 square feet of existing buildings, excavation and export of approximately 9,260 cubic yards of soil, and construction of 329 student housing units, as well as a parking structure. For “worst-case” modeling purposes, construction of the housing was assumed to begin in January 2016 and be completed in April 2017. Since construction would be delayed beyond this timeframe or if it occurs over a longer time period, emissions could be reduced below levels presented herein because of: (1) more modern and cleaner-burning construction equipment fleet mix than incorporated in the California Emissions Estimator Model (CalEEMod, and/or (2) less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval). It was assumed that Project Site No. 23 would involve demolition of one 28,500-square foot building (equating to an estimated 1,311 tons of demolition debris). Assuming each demolition haul truck can haul 20 tons of debris, demolition would require a total of 130 one-way truck trips (or three trips per day) to haul away debris over the demolition phase of the project. One-way truck trips would travel from the project site to the spoils site and from the spoils site back to the project site. Excavation and export of the 9,260 cubic yards of soil during grading would require a total of

1,322 one-way truck trips, assuming each truck can haul 14 cubic yards of soil. On a daily basis, approximately 33 haul trips would be required during export during the peak construction scenario for the Project. Additional details of phasing, selection of construction equipment, and other input parameters, including modeling data, are included in Appendix F.

The results of the calculations for the peak project construction scenario are shown in Table 5.5-5, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily construction emissions for comparison with the APCD thresholds.

Table 5.5-5 MAXIMUM DAILY CONSTRUCTION EMISSIONS						
Phase	Pollutant Emissions (pounds/day)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition	4	48	37	<1	3	2
Site Preparation	5	55	42	<1	11	7
Grading	5	58	44	<1	7	4
Building Construction	5	33	34	<1	4	2
Paving	2	20	15	<1	1	1
Architectural Coatings	52	2	4	<1	1	<1
Maximum Daily Emissions	52	58	44	<1	11	7
<i>Thresholds</i>	75	250	550	250	100	55
Significant Impact?	No	No	No	No	No	No

Sources: CalEEMod (output data is provided in Appendix F); HELIX 2016.

Notes: Includes standard fugitive dust reduction measures.

Worst-case construction emissions would be associated with the student housing project proposed at Project Site No. 23.

As shown in Table 5.5-5, emissions of all criteria pollutants, including PM, related to the worst-case construction scenario would be below the APCD's significance thresholds. Emissions associated with the construction of the remainder of the Project would be less than those forecasted for the worst-case scenario. Thus, direct impacts from criteria pollutants generated during construction would not cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation or exceed the particulate matter threshold and would be less than significant.

Operation

Evaluation of operational emissions was based on the increase of emissions from Project implementation caused by a variety of sources. As illustrated in Table 5.5-6, *Operation Daily Maximum Emissions*, the increase of daily maximum operational emissions associated with the implementation of all construction anticipated from the Project and the projected increase in student enrollment would be below the SDAPCD's significance criteria for all criteria pollutants (including PM₁₀) and would not cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation or exceed the 100-pound per day particulate matter threshold. Thus, operational air quality impacts would be less than significant.

Table 5.5-6 OPERATION DAILY MAXIMUM EMISSIONS						
Emission Source	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	13	<1	<1	<1	<1	<1
Energy	<1	4	3	<1	<1	<1
Mobile	28	56	274	1	51	14
TOTAL	42	60	277	1	51	14
<i>Thresholds</i>	75	250	550	250	100	55
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod (output data is provided in Appendix F: HELIX 2016)

Significance of Impact

The Project would not result in a violation of any air quality standard nor would it contribute substantially to an existing or projected air quality violation that would contribute to a direct impact to air quality. Additionally, as shown in Tables 5.5-5 and 5.5-6, none of the construction phases for the Project would exceed 100 pounds per day of PM dust. Thus, less than significant construction period and operational air quality impacts would occur for the Project.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.5.4 Impact

Issue 4: Would the proposal expose sensitive receptors to substantial pollutant concentrations?

Impact Thresholds

Impacts to sensitive receptors are typically analyzed for operational period CO hotspots and exposure to TACs which includes diesel PM. CO hotspots are analyzed in accordance with the Caltrans Transportation Project-Level Carbon Monoxide Protocol using the CAAQS presented in Table 5.5-1. TAC thresholds are presented in Table 5.5-4. Additionally, PM is evaluated against the 100 pounds per day threshold.

Impact Analysis

Previously Disclosed Land Use Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR addressed TAC emissions from academic sources and concluded that compliance with the campus' Hazardous Materials Business Plan combined with the regulatory controls in place would ensure that no unacceptable health risks would be created from releases of trace amounts of TACs. Less than significant impacts were identified. With regard to localized CO hotspots, an analysis was conducted at seven nearby intersections to determine CO levels and concentrations. As shown in calculations, however, neither existing nor future CO impacts would generate localized impacts that would exceed stated significance thresholds. Therefore, project-

related traffic would result in less than significant impact on microscale air quality. No analysis was conducted of the potential for TACs from construction equipment.

Impacts from the Master Plan Update

The following discussion focuses on the potential TACs associated with the revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Carbon Monoxide Hotspots

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections. A quantitative screening is required in two instances: (1) if a project increases the average delay at signalized intersections operating at Level of Service (LOS) E or F; or (2) if a project causes an intersection that would operate at LOS D or better without the project to operate at LOS E or F with the project. According to the Transportation Impact Analysis (LLG 2016), four intersections would operate at LOS E or F and experience an increase in delay from the Project:

- Linda Vista Road at Napa Street,
- Linda Vista Road at Colusa Street,
- Linda Vista Road at the Alcalá Vista Apartments entrance, and
- Linda Vista Road at Genesee Avenue.

The Transportation Project-Level Carbon Monoxide Protocol (Protocol) (Caltrans 1998) requires the modeler to model the intersections that have worst LOS and the highest traffic volumes. If the selected intersections do not show an exceedance of the NAAQS, none of the other affected intersections would have exceedances. In accordance with the Protocol, it is also necessary to estimate future background CO concentrations in the Project vicinity to determine the potential impact plus background, and evaluate the potential for CO hotspots due to the Project. The second highest 1-hour and 8-hour background concentrations of CO of 3.2 and 1.81 ppm were used to represent future maximum background 1-hour and 8-hour CO concentrations, as presented earlier in Table 5.5-3. CO concentrations in the future may be lower as inspection and maintenance programs and more stringent emission controls are placed on vehicles.

Table 5.5-7, *CO Hotspots Modeling Results*, presents a summary of the predicted CO concentrations (impact plus background) for the intersections evaluated. As shown in Table 5.5-7, the predicted CO concentrations would be substantially below the 1-hour and 8-hour NAAQS and CAAQS for CO. Therefore, no exceedances of the CO standard are predicted. The Project would not cause sensitive receptors to be exposed to substantial pollutant concentrations due to traffic in the Project area.

**Table 5.5-7
CO HOTSPOTS MODELING RESULTS**

Intersection	Peak Period	Maximum 1-hour with Project Concentration	Maximum 8-hour with Project Concentration
Linda Vista Rd at Napa St.	AM	3.6	2.1
	PM	4.0	2.4
Linda Vista Rd at Colusa St.	AM	3.4	2.0
	PM	3.5	2.0
Linda Vista Rd at Alcalá Vista Apts Ent.	AM	3.7	2.2
	PM	3.7	2.2
Linda Vista Rd at Genesee Ave.	AM	4.2	2.5
	PM	4.3	2.6
<i>Ambient Air Quality Standard</i>		20	9.0
Significant Impact?		No	No

Source: HELIX 2016

Notes:

CALINE4 dispersion model output sheets and EMFAC2011 emission factors are provided in Appendix F.

Peak hour traffic volumes are based on the TIA prepared for the Project by LLG 2016.

Second highest 3 years APCD (2012-2014) 1-hour ambient background concentration (3.2 ppm) + 2020 modeled CO 1-hour contribution.

Second highest 3 years APCD 8-hour ambient background concentration (1.81 ppm) multiply by 1-hour/8-hour conversion factor of 0.7 and then add the 2020 modeled CO 8-hour contribution.

ppm = parts per million

Exposure to TACs

Construction activities would result in short-term, project-generated emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment. CARB identified diesel PM as a TAC in 1998. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Thus, the risks estimated for a maximally exposed individual (MEI) are higher if a fixed exposure occurs over a longer time period. According to the Office of Environmental Health Hazard Assessment, HRAs, which determine the exposure of sensitive receptors to TAC emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the Project.

There would be relatively few pieces of off-road, heavy-duty diesel construction equipment in operation, and the construction period would be relatively short, especially when compared to 70 years. Combined with the highly dispersive properties of diesel PM, distance from sensitive receptors, and additional reductions in exhaust emissions from improved equipment, construction-related emissions would not expose sensitive receptors to substantial emissions of TACs. Thus, the potential impact during construction would be less than significant.

With regard to long-term operations, it is not currently known if any of the uses proposed by the Project would include any new academic sources of TACs. Subsequent construction that includes new stationary sources (such as laboratory buildings) would need to analyze specific operation-related TAC impacts to ensure that emissions would be below APCD thresholds. Due to the potential

for individual project sites to include new sources of TACs, implementation of the Project would result in potentially significant impacts related to TAC emissions.

Significance of Impact

Based on the Project analysis, no exceedances of the CO standard are predicted, and the Project would not cause or contribute to a violation of the air quality standard; therefore, the Project would not result in a significant impact for CO.

With regard to construction sources, construction-related emissions would not expose sensitive receptors to substantial emissions of TACs. The impact would be less than significant.

Due to the potential for individual projects to include new sources of TACs, implementation of the Project could result in potentially significant impacts related to TAC emissions.

Mitigation, Monitoring, and Reporting

Implementation of the following mitigation measure for project sites proposing new sources of TACs would reduce impacts to less than significant.

AQ-1 Health Risk Assessment: Prior to the issuance of grading permits for any new facility that would have the potential to emit TACs, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. Building permits shall only be issued for facilities that demonstrate TAC emissions below the standards listed in Table 5.5-4 (excess cancer risk of 1 in 1 million or 10 in 1 million with Toxics-Best Available Control Technology [T-BACT] and non-cancer hazard index of 1.0).

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5.6 Hydrology/Water Quality

This section describes existing hydrologic and water quality conditions within the Project site and vicinity, identifies regulatory requirements and industry standards associated with hydrologic and water quality issues, and evaluates potential impacts and mitigation measures related to implementation of the Project.

Two technical studies related to hydrology and water quality have been prepared for the Project by Kettler-Leweck Engineering (KLE), including: (1) Preliminary Drainage Report (Drainage Report, KLE 2016a); and (2) Preliminary Storm Water Quality Management Plan (SWQMP, KLE 2016b). These studies are summarized below along with other applicable data. The complete reports are included in Appendix G.

5.6.1 Existing Conditions

Watershed and Drainage Characteristics

The Project site is within the existing USD campus, which includes extensive areas of related development, as well as open space along the northern and western campus boundaries. The Project site is located within the Peñasquitos (north and east campus) and San Diego (south and west campus) Hydrologic Units (HUs), two of 11 major drainage areas identified in the San Diego RWQCB *Water Quality Control Plan for the San Diego Basin* (Basin Plan, 1994 as amended). The Peñasquitos HU is a triangular-shaped area of approximately 170 square miles, and extends from Poway on the east to Mission Bay-Del Mar along the coast. This HU is divided into a number of hydrologic areas (HAs) based on local drainage characteristics, with the Project site located within the Tecolote HA (Figure 5.6-1, *Project Location Within Local Hydrologic Designations*). Surface drainage in the Peñasquitos HU occurs through a number of small to moderate size streams, including Tecolote Creek in the Project site vicinity. Tecolote Creek is located approximately 550 feet north of the campus at its closest point, and flows generally west in this area before entering Mission Bay approximately 0.7 mile west of the site.

The San Diego HU is a linear area of approximately 440 square miles encompassing the San Diego River watershed, and extends from the Laguna Mountains on the east to Ocean Beach on the coast. The Project site is located within the Mission San Diego Hydrologic Subarea (HSA) of the Lower San Diego HA (refer to Figure 5.6-1). Surface drainage in the San Diego HU is through the San Diego River watershed and associated tributaries, with the west-flowing river located approximately 0.3 mile south of the Project site and entering the Pacific Ocean approximately 3.5 miles to the west-southwest.

Average annual precipitation in the Project site vicinity (zip codes 92110 and 92111) is approximately 10.8 inches, with much of this (approximately 83 percent) occurring during the period of November through March (Melissadata.com 2016).

The USD campus is located on a mesa top which grades generally down from east to west, with elevations ranging from approximately 260 feet AMSL near the eastern boundary, to 50 feet AMSL at the western campus entrance from Linda Vista Road. Due to its mesa top location, drainage from the site is variable in direction, with 11 related discharge locations, or study points, identified in the

Project Drainage Report. As summarized below, these study points are associated with three principal watersheds, including Tecolote Canyon, Morena Boulevard and the San Diego River (with the 11 study points and related on-site drainage basins shown on the *Existing Condition Hydrology Map* included as Exhibit A of the Project Drainage Report in Appendix G).

Study Points 1 through 5 are associated with the Tecolote Canyon Watershed, which includes approximately 92 acres in the northern and eastern portions of the campus. This area is divided into five associated drainage basins in the Project Drainage Report, including Basins A1 through E1. Study Points 1 through 5 are located along the northern campus boundary and generally drain north to Tecolote Creek, which then continues west to Mission Bay as previously described. A summary of discharge from Study Points 1 through 5 and associated drainage basins is provided in Table 5.6-1, *Project Site Existing Drainage Characteristics*.

Study Point 6 is associated with the Morena Boulevard Watershed, which includes approximately 36 acres in the northern and western portions of the campus. This area includes a single drainage basin (F1) which discharges to Morena Boulevard at Study Point 6 near the western campus boundary. This flow continues generally north via existing storm drain facilities and ultimately enters Mission Bay. A summary of existing discharge from Study Point 6 and associated Basin F1 is provided in Table 5.6-1.

Study Points 7 through 11 are associated with the San Diego River Watershed, which includes approximately 58 acres in the southern portion of the campus. This area is divided into five associated drainage basins in the Project Drainage Report, including Basins G1 through K1. Study Points 7 through 11 are located along the southern campus boundary and generally drain south to the San Diego River, which then continues west to the ocean as previously described. A summary of existing discharge from Study Points 7 through 11 and associated drainage basins is provided in Table 5.6-1.

Table 5.6-1 PROJECT SITE EXISTING DRAINAGE CHARACTERISTICS			
Basin Number	Study Point	Area (acres)	100-year Flow ¹
Tecolote Canyon Watershed			
A1	1	45.40	77.00
B1	2	5.43	20.30
C1	3	32.85	76.46
D1	4	4.45	8.01
E1	5	3.77	7.53
Subtotals	--	91.90	189.30
Morena Boulevard Watershed			
F1	6	36.25	65.53
Subtotal	--	36.25	65.53

Table 5.6-1 (cont.) PROJECT SITE EXISTING DRAINAGE CHARACTERISTICS			
Basin Number	Study Point	Area (acres)	100-year Flow¹
San Diego River Watershed			
G1	7	5.90	22.08
H1	8	9.99	16.48
I1	9	8.86	16.84
J1	10	24.02	53.72
K1	11	9.25	26.07
Subtotals	--	58.02	135.19
TOTALS	--	186.17	390.02

Source: KLE 2016a

¹ cubic feet per second

Existing drainage facilities located within the Project site and adjacent areas include extensive storm drain system structures (e.g., inlets/catch basins, pipelines, etc.) associated with existing development. Downstream drainage facilities include bridge crossings along Tecolote Creek and the San Diego River at I-5, Morena Boulevard, and East Mission Bay Drive/Pacific Highway.

Flood Hazards

The Federal Emergency Management Agency (FEMA) has mapped flood hazards within the Project site and vicinity. The entire Project site and adjacent areas are designated as Zone X, or areas determined to be outside of identified 100-year floodplains (FEMA 2012a and 2012b). The closest mapped 100-year floodplains are associated with Tecolote Creek and the San Diego River, approximately 250 feet to the north and 1,500 feet to the south, respectively.

Groundwater

The Project site and adjacent areas are not located within the areal extent of any mapped regional groundwater basins (California Department of Water Resources [DWR] 2003; San Diego County Water Authority [SDCWA] 1997). The closest mapped groundwater body is the Mission Valley Basin, located approximately 1,500 feet to the south in the San Diego River Valley. Additionally, while shallow groundwater may be present in association with alluvial deposits in proximal segments of Tecolote Creek and the San Diego River, shallow groundwater is generally not anticipated to occur onsite due to the campus location on an elevated mesa top.

Water Quality

Surface water within the Project site and vicinity consists of intermittent flows from storm events and runoff from landscape irrigation. No known surface or groundwater quality data are available for the Project site, with surface storm and irrigation flows typically subject to variations in water quality due to local conditions such as runoff rates/amounts and land use. A summary of typical pollutant sources and loadings for various land use types is provided in Table 5.6-2, *Summary of Typical Pollutant Sources for Urban Storm Water Runoff*, and Table 5.6-3, *Typical Loadings for Selected Pollutants in Runoff from Various Land Uses*. While shallow groundwater is not expected to occur onsite as previously noted, aquifers in the western portion of the Mission Valley Groundwater Basin

typically exhibit high chloride and total dissolved solids (TDS) levels due to suspected seawater intrusion (DWR 2003).

Receiving waters associated with the Project site include Tecolote Creek, Mission Bay, the San Diego River and the Pacific Ocean as previously described. Existing water quality data for downstream areas include quantitative and qualitative monitoring and/or testing results, biological assessment (bioassessment) studies, and Clean Water Act (CWA) Section 303(d) impaired water evaluations conducted by the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB). An overview of selected monitoring and reporting data is provided below.

Table 5.6-2 SUMMARY OF TYPICAL POLLUTANT SOURCES FOR URBAN STORM WATER RUNOFF	
Pollutants	Pollutant Sources
Sediment and Trash/Debris	Streets, landscaping, driveways, parking areas, rooftops, construction activities, atmospheric deposition, drainage channel erosion
Pesticides and Herbicides	Landscaping, roadsides, utility right-of-ways, soil wash-off
Organic Compounds	Landscaping, streets, parking areas, animal wastes, recreation areas
Oxygen Demanding Substances	Landscaping, animal wastes, leaky sanitary sewer lines, recreation areas
Heavy Metals	Automobiles, bridges, atmospheric deposition, industrial areas, soil erosion, corroding metal surfaces, combustion processes
Oil and Grease/Hydrocarbons	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains
Bacteria and Viruses	Landscaping, roads, leaky sanitary sewer lines, sanitary sewer cross-connections, animal wastes, recreation areas
Nutrients (Nitrogen and Phosphorus)	Rooftops, landscaping, atmospheric deposition, automobile exhaust, soil erosion, animal wastes, detergents, recreation areas

Source: USEPA 1999

Table 5.6-3 TYPICAL LOADINGS FOR SELECTED POLLUTANTS IN RUNOFF FROM VARIOUS LAND USES (lbs/acre/year)										
Land Use	TSS	TP	TKN	NH₃ - N	NO₂ + NO₃ - N	BOD	COD	Pb	Zn	Cu
Commercial	1000	1.5	6.7	1.9	3.1	62	420	2.7	2.1	0.4
Parking Lot	400	0.7	5.1	2	2.9	47	270	0.8	0.8	0.04
HDR	420	1	4.2	0.8	2	27	170	0.8	0.7	0.03
MDR	190	0.5	2.5	0.5	1.4	13	72	0.2	0.2	0.14
LDR	10	0.04	0.03	0.02	0.1	N/A	N/A	0.01	0.04	0.01
Freeway	880	0.9	7.9	1.5	4.2	N/A	N/A	4.5	2.1	0.37
Industrial	860	1.3	3.8	0.2	1.3	N/A	N/A	2.4	7.3	0.5
Park	3	0.03	1.5	N/A	0.3	N/A	2	0	N/A	N/A
Construction	6000	80	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Source: USEPA 1999

HDR = High Density Residential; MDR = Medium Density Residential; LDR = Low Density Residential;
N/A = Not available; insufficient data to characterize; TSS = Total Suspended Solids; TP = Total Phosphorus;
TKN = Total Kjeldahl Nitrogen; NH₃ - N = Ammonia - Nitrogen; NO₂ + NO₃ - N = Nitrite + Nitrate - Nitrogen;
BOD = Biochemical Oxygen Demand; COD = Chemical Oxygen Demand; Pb = Lead; Zn = Zinc; Cu = Copper

Surface Water Quality Monitoring Data

As summarized below, water quality monitoring has been conducted within the Tecolote Creek and San Diego River watersheds in association with requirements under the federal CWA, National Pollutant Discharge Elimination System (NPDES), and the associated Municipal Storm Water Permit (refer to the discussion of Regulatory Framework below for additional information).

Tecolote Creek Watershed

Wet weather monitoring has been conducted historically at the Tecolote Creek Mass Loading Station (MLS) and the Tecolote Creek Temporary Water Assessment Station (TWAS-2), located approximately 0.3 mile northwest and 1.5 miles north of the Project site, respectively. The most recent monitoring at both noted locations was conducted in 2011/2012, with the results outlined below.

- Tecolote MLS. This monitoring included numerous physical, chemical and biological parameters, with resulting data for 2011/2012 indicating the following trends: (1) applicable water quality objectives were exceeded at a high frequency (more than 50 percent) for total suspended solids (TSS), turbidity, bifenthrin/permethrin (pyrethroid insecticides), and bioassessment scores (as outlined below); (2) water quality objectives were exceeded at a moderate frequency (25 to 50 percent) for fecal coliform bacteria and chemical oxygen demand (COD); and (3) water quality objectives were exceeded at a low frequency (less than 25 percent) for toxicity and nutrients (Weston Solutions, Inc. [Weston] 2013). Bioassessment testing involves evaluation of the taxonomic richness and diversity of benthic macroinvertebrate (BMI) communities based on the Index of Biotic Integrity (IBI), which provides a quantified score reflecting biological conditions and associated water quality.
- Tecolote TWAS-2. This monitoring included similar categories as noted above for the Tecolote MLS, with resulting data for 2011/2012 indicating the following trends: (1) applicable water quality objectives were exceeded at a high frequency for turbidity, bifenthrin, bioassessment scores, and fecal coliform bacteria; (2) water quality objectives were exceeded at a moderate frequency for toxicity, COD, TSS, and permethrin; and (3) water quality objectives were exceeded at a low frequency for nutrients (Weston 2013).

Jurisdictional dry weather sampling was conducted most recently in 2011 at a number of locations both up- and downstream of the Project site in the Tecolote Creek watershed. These efforts documented that water quality objectives were most commonly exceeded for turbidity, conductivity, and ammonia; and less commonly for pollutants including enterococcus bacteria, methylene blue active substances (MBAS¹), and total coliform bacteria (Weston 2013).

San Diego River Watershed

Wet weather monitoring has been conducted historically at the San Diego River MLS and the San Diego River TWAS-1 site, located approximately 0.6 mile south and 4 miles east of the Project site, respectively. The most current monitoring at both noted locations was conducted in 2011/2012, with the results summarized below.

¹ MBAS consist of surfactants (compounds that lower surface tension between two liquids or liquids/solids) that typically occur in substances such as commercial detergents, wetting agents, emulsifiers, foaming agents and dispersants.

- San Diego River MLS. This monitoring included similar categories as noted above for the Tecolote MLS, with resulting data for 2011/2012 indicating the following trends: (1) applicable water quality objectives were exceeded at a high frequency for fecal coliform bacteria and bioassessment scores; (2) water quality objectives were exceeded at a moderate frequency for turbidity, bifenthrin, permethrin and TDS; and (3) water quality objectives were exceeded at a low frequency for toxicity and nutrients (Weston 2013).
- San Diego River TWAS-1. This monitoring included similar categories as noted above for the Tecolote MLS, with resulting data for 2011/2012 indicating the following trends: (1) applicable water quality objectives were exceeded at a high frequency for fecal coliform bacteria and bioassessment scores; (2) water quality objectives were exceeded at a moderate frequency for turbidity, bifenthrin and permethrin; and (3) water quality objectives were exceeded at a low frequency for toxicity, nutrients and TDS (Weston 2013).

Jurisdictional dry weather sampling was conducted most recently in 2011 at a number of locations both up- and downstream of the Project site in the San Diego River watershed. These efforts documented that water quality objectives were most commonly exceeded for turbidity, conductivity, ammonia and MBAS; and less commonly for pollutants including nitrate and bacteria (Weston 2013).

CWA Section 303(d) Impaired Water Bodies and Total Maximum Daily Loads

The SWRCB and RWQCBs produce bi-annual qualitative assessments of statewide and regional water quality conditions. These assessments are focused on CWA Section 303(d) impaired water listings and scheduling for assignment of total maximum daily load (TMDL) requirements. A TMDL establishes the maximum amount of an impairing substance or stressor that a water body can assimilate and still meet water quality standards, and allocates that load among pollution contributors. TMDLs are quantitative tools for implementing state water quality standards, based on the relationship between pollution sources and water quality conditions. States are required to identify and document any and all polluted surface water bodies, with the resulting documentation referred to as the CWA Section 303(d) List of Water Quality Limited Segments, or more commonly the CWA Section 303(d) list. This list of water bodies identifies the associated pollutants and TMDLs, along with projected TMDL implementation schedules/status. The most current (2010) approved CWA Section 303(d) list identifies the following impaired waters in downstream watersheds (SWRCB 2016):

- Mission Bay Shoreline at Tecolote Shores (no quantified area) is listed for enterococcus and total coliform bacteria, with an expected TMDL completion date of 2019 for all pollutants.
- Mission Bay at the mouth of Tecolote Creek (3 acres) is listed for eutrophic conditions and lead, with an expected TMDL completion date of 2019 for all pollutants.
- The lower San Diego River (16 miles) is listed for enterococcus and fecal coliform bacteria, low dissolved oxygen, manganese, nitrogen, phosphorus, TDS and toxicity. The expected TMDL completion dates are 2019 for low dissolved oxygen, phosphorus and TDS; and 2021 for enterococcus bacteria, manganese, nitrogen and toxicity. The TMDL completion date for fecal coliform bacteria is listed as 2009, with an associated resolution (R9-2010-001) adopted by the RWQCB as a Basin Plan amendment on February 10, 2010 to implement related TMDL requirements.

- The Pacific Ocean Shoreline at the San Diego River outlet (no quantified area) is listed for enterococcus and total coliform bacteria. The expected TMDL completion date for enterococcus bacteria is 2021, while the TMDL date for fecal coliform bacteria is listed as 2010 (with associated Resolution R9-2010-001 adopted by the RWQCB in 2010 as previously noted).
- Tecolote Creek (7 miles) is listed for cadmium, copper, indicator bacteria, lead, nitrogen, phosphorus, selenium, toxicity, turbidity and zinc. The expected TMDL completion dates are 2019 for cadmium, copper, lead, phosphorus, toxicity, turbidity and zinc; and 2021 for nitrogen and selenium. The TMDL date for indicator bacteria is listed as 2009, with associated Resolution R9-2010-001 adopted by the RWQCB in 2010 as previously noted.

Regulatory Setting

The Project is subject to a number of regulatory requirements associated with federal, state and local guidelines, as summarized below.

National Pollutant Discharge Elimination System Requirements

The Project is subject to applicable elements of the CWA, including the NPDES. Specific NPDES requirements associated with the Project include conformance with the following: (1) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit, NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ; as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ); (2) General Groundwater Extraction Discharges to Surface Waters Permit (Groundwater Permit; NPDES No. CAG919003, Order No. R9-2015-0013); (3) Waste Discharge Requirements for Municipal Separate Storm Sewer Systems (MS4) Permit (Municipal Permit, NPDES No. CAS 0109266, Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100); and (4) related City standards as outlined below.

Construction General Permit

Construction activities exceeding one acre (or meeting other applicable criteria) are subject to pertinent requirements under the Construction General Permit. This permit was issued by the SWRCB, pursuant to authority delegated by the U.S. Environmental Protection Agency (USEPA). Specific conformance requirements include implementing a Storm Water Pollution Prevention Plan (SWPPP), an associated Construction Site Monitoring Program (CSMP), employee training, and minimum BMPs, as well as a Rain Event Action Plan (REAP) for applicable projects (e.g., those in Risk Categories 2 or 3, as outlined below). Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., sediment erosion and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the off-site discharge of pollutants in storm water runoff. Depending on the risk level, these may include efforts such as minimizing/ stabilizing disturbed areas, mandatory use of technology-based action levels, effluent and receiving water monitoring/reporting, and advanced treatment systems (ATS). Specific pollution control measures require the use of best available technology economically achievable (BAT) and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through applicable BMPs. While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil

characteristics, detailed guidance for construction-related BMPs is provided in the permit and related City standards (as outlined below), as well as additional sources including the *EPA National Menu of Best Management Practices for Storm Water Phase II – Construction* (USEPA 2016), and *Storm Water Best Management Practices Handbooks* (California Stormwater Quality Association [CASQA] 2009). Specific requirements for the Project under this permit would be determined during SWPPP development, after completion of Project plans and application submittal to the SWRCB.

Groundwater Permit

While shallow groundwater is generally not expected to occur on site as previously described, if Project-related construction activities entail the discharge of extracted groundwater into receiving waters, the University would be required to obtain coverage under the Groundwater Permit. This permit was issued by the SWRCB, pursuant to authority delegated by the USEPA. Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharge activities, with exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include: (1) submittal of appropriate application materials and fees; (2) implementation of pertinent (depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

Municipal Permit

The current Municipal Permit became effective for listed co-permittees, including the City, on June 27, 2013. The Municipal Permit implements a regional strategy for water quality and related concerns, and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include: (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities. Municipal Permit conformance entails considerations such as receiving water limitations (e.g., Basin Plan criteria as outlined below), waste load allocations (WLAs), and numeric water quality based effluent limitations (WQBELs). Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable (MEP) involve methods such as: (1) using jurisdictional planning efforts (e.g., discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate BMPs, including low impact development (LID) measures, to avoid, minimize and/or mitigate effects including increased erosion and sedimentation, hydromodification² and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements.

² Hydromodification is generally defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (interception, infiltration and overland/groundwater flow) caused by urbanization or other land use changes that result in increased stream flows and sediment transport.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code, which authorizes the SWRCB to implement the provisions of the federal CWA.

The State of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Basin Plans that designate beneficial uses for surface waters, groundwater basins and coastal waters, and establish water quality objectives for applicable waters as outlined below.

Basin Plan Requirements

The RWQCB basin plan establishes a number of beneficial uses and water quality objectives for surface and groundwater resources. Beneficial uses are generally defined in the Basin Plan as “the uses of water necessary for the survival or well-being of man, plus plants and wildlife.” Identified existing and potential beneficial uses for the Project site and applicable downstream areas of Tecolote Creek (including coastal waters) include: industrial service supply (IND); contact and non-contact water recreation (REC 1 and REC 2); commercial and sport fishing (COMM); estuarine habitat (EST); warm freshwater habitat (WARM); wildlife habitat (WILD); rare, threatened or endangered species (RARE); marine habitat (MAR); migration of aquatic organisms (MIGR); spawning, reproduction and/or early development (SPWN); and shellfish harvesting (SHELL).

Identified existing and potential beneficial uses for the Project site and applicable downstream areas of the San Diego River (including coastal waters) include: agricultural supply (AGR); IND; REC 1 and REC 2; preservation of biological habitats of special significance (BIOL); COMM; EST; WARM; WILD; RARE; MAR; MIGR; SPWN; AND SHELL.

Identified beneficial uses for groundwater in the Mission San Diego HSA include municipal and domestic supply (MUN), AGR, IND, and industrial process supply (PROC). No beneficial uses are identified for groundwater in the Tecolote HA.

Water quality objectives identified in the Basin Plan are based on established beneficial uses, and are defined as “the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses.” These objectives are incorporated into related regulatory requirements, such as the NPDES permitting process described above.

Local Requirements

Drainage Design Manual

Pursuant to SDMC Chapter 14 Article 2 Division 2, Storm Water Runoff and Drainage Regulations, drainage regulations apply to all development in the City, whether or not a permit or other approval is required.

Drainage design policies and procedures for the City are provided in the City's Drainage Design Manual (1984), which is incorporated in the Land Development Manual as Appendix B. The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for development within the City.

Storm Water Standards Manual

The City has adopted a jurisdiction-specific Storm Water Standards Manual (Storm Water Manual, City 2016) to reflect related NPDES standards, as well as the associated Model BMP Manual for the San Diego Region (Project Clean Water 2016). The Storm Water Manual provides direction for associated regulatory compliance, including identification of construction and post-construction storm water requirements for Standard Projects and Priority Development Projects (PDPs). Specifically, the manual identifies regulatory requirements and provides detailed performance standards and monitoring/maintenance efforts for: (1) construction BMPs; (2) overall storm water management design; (3) site design (LID) and source control BMPs applicable to all projects; (4) pollutant (or treatment) control and hydromodification management BMPs applicable to PDPs; (5) operation and maintenance requirements for applicable BMPs; and (6) specific direction and guidance to provide conformance with City and related NPDES storm water standards.

The Storm Water Manual also includes a section called *Special Considerations for Redevelopment Projects*, termed the 50 Percent Rule. This section notes that if the project is a redevelopment project, the structural BMP performance and hydromodification management requirements apply to redevelopment PDPs as follows:

- Where redevelopment results in the creation or replacement of impervious surface in an amount of less than 50 percent of the surface area of the previously existing development, then the associated structural BMP performance requirements identified in the NPDES Municipal Permit apply only to the creation or replacement of impervious surface, and not the entire development.
- Where redevelopment results in the creation or replacement of impervious surface in an amount of more than 50 percent of the surface area of the previously existing development, then the associated structural BMP performance requirements in the NPDES Municipal Permit apply to the entire development.

Based on related analysis in the Project SWQMP, it was determined that the Project would be within the noted 50 percent criterion for impervious surfaces, with additional information provided below in Section 5.6.2 and the Project SWQMP included as Appendix G.

City Grading Ordinance

The City Grading Ordinance (SDMC Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control storm water pollution from sources such as erosion/sedimentation and construction materials during Project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

City of San Diego General Plan

The City General Plan (2008) provides a number of goals and policies related to hydrology and water quality concerns in the Public Facilities, Services, and Safety Element; and the Conservation Element, as summarized below.

- Public Facilities, Services, and Safety Element. This element includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For storm water, these include efforts to provide appropriately designed and sized infrastructure to ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the NPDES).
- Conservation Element. The Conservation Element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources.

5.6.2 Impact

Issue 1: Would the proposal result in a substantial increase in impervious surfaces and associated increased runoff?

Issue 2: Would the proposal result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

Impact Thresholds

The City *Significance Determination Thresholds* (2011) identify significant hydrologic impacts in association with:

- Substantial changes to runoff rates or amounts.
- Modification of existing drainage patterns such that environmental resources, including biological communities or archaeological sites, would be adversely affected.
- Increased flooding in on- or off-site areas that would impose flood hazards on other properties or development wholly or partially within the 100-year floodplain identified on the FEMA maps.

Impact Analysis

Previously Disclosed Hydrology Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to the generation of additional runoff from proposed development and associated effects to on- and off-site drainage facilities. The analysis concluded that off-site drainage facilities would not be significantly impacted by the project, but that the on-site drainage system would require improvements to accommodate proposed development and would be required to meet applicable City engineering standards. A mitigation

measure was identified to require that: (1) a site-specific drainage plan be prepared prior to issuance of any grading permits; (2) the results of the noted drainage study be incorporated into the grading plan, including appropriate BMPs to minimize and control runoff; and (3) the University provide evidence to the satisfaction of the City Engineer that appropriate runoff control devices have been installed prior to issuance of building permits.

The 1996 Master Plan FEIR did not address the issues of potential project-related drainage alteration, or development within 100-year floodplains and associated potential flood hazards.

Impacts from the Master Plan Update

The following discussion focuses on the potential hydrologic and flood-related impacts associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Runoff Rates and Amounts

Implementation of the Project would result in the construction of new impervious surfaces, including pavement and structures. These areas would increase both the rate and amount of runoff generated within the site by reducing infiltration capacity and concentrating flows. As outlined in Table 5.6-4, *Master Plan Update Proposed Drainage Characteristics*, increased flows would occur at Study Points 1 through 3, 6, 10 and 11, in association with post-development Basins L1 through N1, Q1, U1, and V1. The remaining study points and associated basins would exhibit no net increase in 100-year flows from Project implementation. Proposed on-site storm drain facilities include a series of curb/gutter inlets, catch basins, pipelines and related facilities, with these structures to be designed to accommodate post-development 100-year storm flows per City requirements (and proposed storm drain facilities and study points shown on the *Developed Condition Hydrology Map* included as Exhibit B of the Project Drainage Report in Appendix G). As a result, no potential impacts related to increased runoff rates and amounts within the site would occur from implementation of the Master Plan Update. As described below in Section 5.6.3, a series of bio-filtration facilities are proposed as pollutant (treatment or structural) and hydromodification control BMPs to provide conformance with applicable water quality standards (in concert with other applicable design measures and BMPs). The Project Drainage Report notes that "In addition to providing water quality treatment and hydromodification control, it is anticipated that structural BMPs...will provide large storm attenuation up to and including the 100-year storm event" (with details regarding treatment requirements and BMP design provided in Appendix D of the SWQMP included as Appendix G. As a result, the Project Drainage Report concludes that "...there is no anticipated need for regional detention basins..." and "...there are no anticipated adverse impacts to downstream drainage facilities or natural drainage courses."

Table 5.6-4 MASTER PLAN UPDATE PROPOSED DRAINAGE CHARACTERISTICS				
Proposed Basin Number (Existing Basin Number)	Study Point	Area (acres)	100-year Flow (Existing Flow) ¹	100-year Flow Change ¹
Tecolote Canyon Watershed				
L1 (A1)	1	45.50	81.76 (77.00)	+4.76
M1 (B1)	2	5.44	20.36 (20.30)	+0.06
N1 (C1)	3	33.01	88.33 (76.46)	+11.87
O1 (D1)	4	4.45	8.01 (8.01)	0
P1 (E1)	5	3.77	7.53 (7.53)	0
Subtotals	--	92.17	205.99 (189.30)	+16.69
Morena Boulevard Watershed				
Q1 (F1)	6	36.25	70.47 (65.53)	+4.94
Subtotal	--	36.25	70.47 (65.53)	+4.94
San Diego River Watershed				
R1 (G1)	7	5.90	22.08 (22.08)	0
S1 (H1)	8	9.99	16.48 (16.48)	0
T1 (I1)	9	8.86	16.84 (16.84)	0
U1 (J1)	10	24.02	65.18 (53.72)	+11.46
V1 (K1)	11	8.97	31.26 (26.07)	+5.19
Subtotals	--	57.75	151.84 (135.19)	+16.65
TOTALS	--	186.17	428.30 (390.02)	+38.28

Source: KLE 2016a

¹ cubic feet per second

Drainage Alteration

As described in Section 5.6.1, surface flows within and from the Project site and associated off-site areas are variable in direction. Specifically, existing flows from the site are discharged at 11 study points, which correspond to associated on-site drainage basins (refer to Tables 5.6-1 and 5.6-4). Flows exiting the site discharge into three principal watersheds, including Tecolote Canyon and Morena Boulevard which ultimately drain to Mission Bay, and the San Diego River which ultimately drains to the Pacific Ocean. Project implementation would result in some modification of the existing on-site drainage patterns and directions through proposed grading and construction. Specifically, Project development would feature a series of storm drain facilities to capture, regulate and convey flows within and through the site. The Project Drainage Report notes that "The proposed development will maintain existing drainage patterns as much as feasible, and runoff from the campus will continue to be split amongst the three watersheds." The report also indicates, however, that based on current design, a minor area (approximately 0.27 acre, or 0.3 percent of the 92-acre Tecolote Canyon watershed) within the existing San Diego River watershed onsite is anticipated to be redirected north to the adjacent Tecolote Canyon watershed. The report goes on to discuss the fact that this potential diversion may be avoided when more detailed engineering is conducted and each site plan/project is refined to minimize or eliminate the redirection of runoff. If fully maintaining the existing condition is not found to be feasible, the associated additional peak flow runoff would be mitigated through the use of integrated BMPs that retain runoff to address water quality, hydromodification, and large storm attenuation requirements, to the satisfaction of the City Engineer. Specifically, this would entail designing the associated pollutant and hydromodification

BMPs to ensure that they would provide large storm attenuation up to and including the 100-year storm event, as described above in the discussion of Runoff Rates and Amounts.

Based on the noted considerations, along with proposed and required conformance with applicable regulatory standards, implementation of the Master Plan Update would not substantially alter existing on- or off-site drainage patterns, any related potential increase in runoff rates and amounts would be effectively regulated by proposed drainage/water quality facilities, and no associated adverse effects to environmental resources would result (including biological communities or archaeological sites).

Flood Hazards

As described in Section 5.6.1, the University and project sites are located outside of mapped 100-year floodplains (FEMA 2102a and 2012b). As a result, Project implementation would not result in any associated increase of on- or off-site flood hazards.

Significance of Impact

Based on the described design considerations, including proposed drainage system features, and conformance with applicable associated regulatory standards, potential Project-related on- and off-site impacts associated with additional impervious surfaces, corresponding increased runoff rates and amounts, drainage alteration/environmental resources (including biological communities and archaeological sites), and flood-related hazards would be less than significant.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.6.3 Impact

Issue 4: Would the proposal result in a substantial increase in pollutant discharge to receiving waters, increase the discharge of identified pollutants to an already impaired water body, or otherwise impacts local and regional water quality, including groundwater?

Impact Thresholds

The City *Significance Determination Thresholds* (2011) note that compliance with applicable City (and related) water quality standards is assured through permit conditions provided by LDR Engineering. Adherence to the City storm water standards is thus considered adequate to preclude surface water quality impacts, unless substantial evidence supports a fair argument that a significant impact will occur. Because the Master Plan Update does not involve activities that could directly affect groundwater quality (e.g., underground fuel storage tanks or septic systems), potential impacts to groundwater quality are limited to the percolation of Project-related surface runoff and associated pollutants (e.g., in pervious portions of the proposed storm drain system). Accordingly, conformance with the City storm water standards is the applicable threshold for both surface and groundwater water resources.

Impact Analysis

Potential Project-related water quality impacts are associated with both short-term construction activities and long-term operation and maintenance, as described below.

Previously Disclosed Water Quality Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential impacts related to water quality in Section VI, *Effects Found Not To Be Significant*, and concluded that “The Master Plan Update would not change the quality of storm water runoff or a public water supply.”

Impacts from the Master Plan Update

The following discussion focuses on the potential water quality impacts associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Short-term Construction Impacts

Potential water quality impacts related to Project construction include erosion/sedimentation, the use and storage of construction-related hazardous materials (e.g., fuels, etc.), generation of debris from demolition activities, and disposal of extracted groundwater (if required), as described below.

Erosion and Sedimentation. Project-related excavation, grading, and construction activities could potentially result in related erosion and off-site sediment transport (sedimentation). Project activities would involve the removal of surface stabilizing features such as vegetation, excavation of existing compacted materials from cut areas, redeposition of excavated (and/or imported) material as fill within individual project sites, and potential erosion from disposal of extracted groundwater (if required). Project-related erosion could result in the influx of sediment into downstream receiving waters, with associated water quality effects such as turbidity and transport of other pollutants that tend to adhere to sediment particles (e.g., hydrocarbons).

While graded, excavated and filled areas associated with construction activities would be stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential would be higher in the short-term than for existing conditions. Areas to be developed or redeveloped as part of the Master Plan Update would be especially susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Erosion and sedimentation are not considered to be significant long-term concerns for the Master Plan Update, as developed areas would be stabilized through installation of hardscape or landscaping as noted. The Project would also incorporate long-term water quality controls pursuant to City and NPDES guidelines, including (among other efforts) measures that would avoid or reduce off-site sediment transport. This would include efforts such as the use of water quality (bio-filtration) facilities, irrigation controls and drainage facility maintenance (e.g., to remove accumulated sediment).

The short-term water quality effects from Project-related erosion and sedimentation could potentially affect downstream waters and associated wildlife habitats, with such impacts considered

potentially significant. Short-term (construction) erosion and sedimentation impacts would be addressed through conformance with City storm water standards and the related NPDES Construction General Permit, as described above in Section 5.6.1 under Regulatory Framework. This would include implementing an authorized SWPPP for proposed construction, including (but not limited to) erosion and sedimentation BMPs.

The Project SWQMP identifies a number of potential construction BMPs related to erosion/sedimentation, such as the use of gravel bag chevrons, inlet protection, and stabilized construction entrances. While Project-specific BMPs would be determined during the SWPPP process based on site characteristics (soils, slopes, etc.), they would include standard industry measures and guidelines from the City Storm Water Manual and NPDES Construction General Permit, as well as the additional sources identified in Section 5.6.1 under Regulatory Framework. Typical erosion and sediment control BMPs that may be required in the Project SWPPP include the following: (1) seasonal grading restrictions during the rainy season; (2) preparation and implementation of a CSMP and, if applicable, a REAP to provide enhanced erosion and sediment control measures prior to predicted storm events; (3) use of erosion control/stabilizing measures such as geotextiles, mats, fiber rolls, or soil binders; (4) use of sediment controls to protect the site perimeter and prevent off-site sediment transport, including measures such as inlet protection, silt fencing, fiber rolls, gravel bags, temporary sediment basins, street sweeping, stabilized construction access points and sediment stockpiles, and use of properly fitted covers for sediment transport vehicles; (5) compliance with local dust control measures; (6) appropriate BMP performance monitoring and as-needed maintenance; and (7) implementation of additional BMPs as necessary to ensure adequate erosion/sediment control and regulatory conformance.

Construction-related Hazardous Materials. Project construction would involve the on-site use and/or storage of hazardous materials such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The accidental discharge of such materials during Project construction could potentially result in significant impacts if these pollutants reach downstream receiving waters, particularly materials such as petroleum compounds that are potentially toxic to aquatic species in low concentrations. Implementation of a SWPPP would be required under NPDES and City guidelines as previously described, and would include detailed measures to avoid or mitigate potential impacts related to the use and potential discharge of construction-related hazardous materials.

The Project SWQMP identifies a number of potential construction BMPs related to the proper use and storage of hazardous materials, such as appropriate material/equipment storage and maintenance sites, waste containment facilities, and washout areas. While detailed BMPs would be determined as part of the NPDES/SWPPP process based on project-specific parameters, they are likely to include standard industry measures and guidelines from sources including the City Storm Water Manual and Construction General Permit, as well as the additional sources identified in Section 5.6.1 under Regulatory Framework. Typical BMPs associated with construction-related hazardous materials that may be required in the Project SWPPP include the following: (1) minimizing and properly locating (e.g., away from drainages/storm drains) hazardous material use/storage areas; (2) providing appropriate covers/enclosures, secondary containment (e.g., berms), monitoring/maintenance, and inventory control (e.g., delivery logs/labeling) for hazardous material use/storage areas; (3) restricting paving operations during wet weather and providing appropriate sediment control downstream of paving activities; (4) utilizing properly designed and contained

washout areas for materials including concrete, dry wall and paint; (5) properly maintaining all construction equipment and vehicles; (6) providing training to applicable construction employees on the proper use, handling, storage, disposal and notification/cleanup for construction-related hazardous materials; (7) storing containment and cleanup materials onsite; (8) implementing appropriate solid waste containment, disposal and recycling efforts; and (9) properly locating, maintaining and containing portable wastewater facilities.

Demolition-related Debris Generation. Implementation of the Master Plan Update would involve the demolition of existing on-site facilities including structures and pavement. These activities would generate variable amounts of construction debris, potentially including concrete, asphalt, glass, metal, drywall, paint, insulation, fabric and wood. Demolition activities could also potentially generate particulates (e.g., from pavement removal), as well as pollutants related to hazardous materials such lead-based paint (LBP) and asbestos containing materials (ACMs) if older (pre-1978) structures are involved. The introduction of demolition-related particulates or hazardous material pollutants into local drainages or storm drain systems could potentially result in significant downstream water quality impacts.

Project construction would be subject to a number of regulatory controls related to demolition, including City storm water standards and related NPDES/SWPPP requirements. While detailed BMPs would be determined as part of the NPDES/SWPPP process based on project-specific parameters, they are likely to include the following types of standard industry measures and guidelines from sources including the Construction General Permit and City Storm Water Manual, as well as the additional sources identified in Section 5.6.1 under Regulatory Framework: (1) recycle appropriate (i.e., non-hazardous) construction debris for on- or off-site use whenever feasible; (2) use dust-control measures such as watering to reduce particulate generation for pertinent locations/activities (e.g., concrete removal); and (3) implement appropriate erosion prevention and sediment control measures downstream of all demolition activities.

In addition, if LBP and/or ACMs are present in facilities to be removed, conformance with associated regulatory standards would be required, as outlined in Section 7.1.4, *Health and Safety*. Specifically, such measures would include efforts to inventory and document LBP/ACM occurrence by qualified inspectors; regulate sampling and monitoring procedures; contain/abate contaminated materials during construction; ensure acceptable exposure levels; and provide for safe and appropriate handling, transport and disposal of hazardous materials generated during Project construction.

Disposal of Extracted Groundwater. While shallow groundwater is generally not expected to occur in the Project site and vicinity, construction dewatering could potentially be required during Project construction (e.g., in associated with locally perched groundwater aquifers). Disposal of groundwater extracted during construction activities into local drainages and/or storm drain facilities could potentially generate significant water quality impacts through erosion/sedimentation or the possible occurrence of pollutants in local aquifers. Project construction would require conformance with NPDES Groundwater Permit criteria prior to disposal of extracted groundwater. While specific BMPs to address potential water quality concerns from disposal of extracted groundwater would be determined based on site-specific parameters, they would likely include the types of standard measures outlined above under Regulatory Framework in Section 5.6.1.

Long-term Operation and Maintenance Impacts

Based on analysis in the Project SWQMP, 11 of the 14 individual projects identified under the Master Plan Update are considered Priority Development Projects (PDPs), with the following exceptions identified as Standard Projects: (1) proposed trails/landscape enhancements; (2) the plaza/mall/bridge; and (3) proposed academic/administrative support (KLE 2016b). As a result, the noted Standard Projects described in Section 3.0, *Project Description*, would be subject only to the LID site design and source control BMPs identified below in this analysis, while the remaining PDPs would also be required to implement identified pollutant (treatment) and hydromodification control BMPs.

The Project SWQMP identifies water quality pollutants/conditions of concern and appropriate control measures related to development of the Master Plan Update, based on procedures identified in the City storm water standards and related NPDES Municipal Permit. Specifically, these include sediment, nutrients, heavy metals, trash and debris, oil and grease, pesticides, organic substances, oxygen demanding substances, bacteria and viruses, coliform bacteria, benthic community effects, and sediment toxicity (refer to KLE 2016b in Appendix G). Urban pollutants accumulate in areas such as streets, parking areas, and drainage facilities, and are picked up in runoff during storm events. Runoff within the Project site would increase from construction of impervious surfaces as previously described, with a corresponding increase in pollutant loading potential. Based on these conditions, long-term Project operation could result in the on- and off-site transport of urban pollutants and associated significant effects such as increased turbidity, oxygen depletion, and toxicity to attendant species in downstream receiving waters. Based on the described conditions and related CWA Section 303(d) impaired water listings outlined in Section 5.6.1, implementation of the Master Plan Update could potentially result in significant long-term water quality impacts. The Master Plan Update would conform to applicable City and NPDES storm water standards to address these concerns, however, with such conformance to include the use of appropriate post-construction LID site design, source control, and pollutant (treatment)/hydromodification control BMPs (for applicable projects as previously described). Specific proposed BMPs are identified in the Project SWQMP (Appendix G), with these measures summarized below and followed by a discussion of associated monitoring and maintenance activities.

LID Site Design BMPs. LID site design BMPs are intended to avoid, minimize and/or control post-development runoff, erosion potential and pollutant generation to the MEP by mimicking the natural hydrologic regime. The LID process employs design practices and techniques to effectively capture, filter, store, evaporate, detain and infiltrate runoff close to its source. Specific LID site design BMPs are identified in the Project SWQMP, based on requirements in the City Storm Water Manual. These include strategies/measures to retain natural drainage features and other undisturbed areas, minimize impervious areas and compaction, disperse impervious areas (e.g., by diverting associated flows into landscaping), collect and reuse runoff, and use native and/or drought-tolerant landscaping, with additional information provided in Appendix G. All of the proposed LID site design BMPs would help reduce long-term urban pollutant generation by minimizing runoff rates and amounts, retaining permeable areas, increasing on-site filtering and infiltration, and reducing erosion/sedimentation potential.

Source Control BMPs. Source control BMPs are intended to avoid or minimize the introduction of pollutants into storm drains and natural drainages to the MEP by reducing on-site pollutant generation and off-site pollutant transport. Specific source control BMPs identified in the Project SWQMP are summarized below, based on requirements in the City Storm Water Manual. These

include efforts to prevent illicit discharges, label storm drain system inlets/catch basins (and other applicable locations), and properly design/contain trash storage areas, with additional information provided in Appendix G. All of the proposed source control BMPs would help to improve long-term water quality within and downstream from the Project site by avoiding or minimizing pollutant generation and exposure to storm flows at the source.

Pollutant Control BMPs. Pollutant control BMPs are designed to remove pollutants from urban runoff for a design storm event to the MEP through means such as filtering, treatment, or infiltration. Pollutant control BMPs are required to address the identified pollutants of concern for PDPs, and must provide medium or high levels of removal efficiency for these pollutants (per applicable regulatory requirements). Preliminary pollutant control BMPs identified in the Project SWQMP include bio-filtration facilities in the form of flow-through planters. As shown in Table 5 of the SWQMP, flow-through planters qualify as LID BMPs, and exhibit a high or medium level of removal efficiency for all identified pollutants. The Project SWQMP provides design and sizing information for the proposed flow-through planters, based on appropriate criteria such as the design storm event, BMP design capture volume, and accommodation of flows from off-site areas where applicable. The analysis also notes that while final pollutant control BMPs would be determined during substantial conformance review or the ministerial permit process, the ultimate pollutant control BMPs would be similarly designed and sized to conform with applicable requirements as noted. In addition, the project sites would incorporate related efforts to avoid or reduce pollutant discharge in site runoff, including the LID site design and source control BMPs described above.

The Master Plan Update would qualify under the *Special Considerations for Redevelopment Projects* (the 50 Percent Rule) as outlined for the City Storm Water Manual under the discussion of Regulatory Framework in Section 5.6.1. As a result, the pollutant control BMPs would be designed to address the creation or replacement of impervious surfaces, rather than the entire development.

Hydromodification Management Facilities. As previously described, implementation of Master Plan Update PDPs would require appropriate measures to address potential hydromodification impacts. The pollutant control BMPs identified above (flow-through planters with no separate storage vaults) are identified as applicable hydromodification management facilities in the Project SWQMP, with appropriate design and sizing criteria. The SWQMP also notes, however, that (similar to pollutant control BMPs) final hydromodification management facilities would be determined during substantial conformance review or the ministerial permit process. As a result, these facilities may ultimately encompass various BMPs, including (but not limited to) bio-filtration basins with underground hydromodification storage cisterns/vaults. Regardless of the ultimate nature of hydromodification facilities, they would be designed and sized to conform with applicable requirements such as the design storm event, BMP design capture volume, and hydromodification control volume (including accommodation of flows from off-site areas where applicable).

Post-construction BMP Monitoring/Maintenance Schedules and Responsibilities. Identified BMPs include physical structures such as irrigation systems, signs/stencils, and bio-filtration facilities that require ongoing monitoring and maintenance. Pursuant to requirements in the City Storm Water Manual and the related NPDES Municipal Permit (as outlined in Section 6.0 of the Project SWQMP), the applicant would be required to enter into a written Maintenance Agreement with the City for applicable facilities and implement an Operation and Maintenance Plan. Specifically, this process would entail identifying and documenting maintenance responsibilities, funding sources, activities

and schedules to ensure proper BMP function in perpetuity. A summary of typical maintenance procedures for applicable proposed BMPs is provided below.

Irrigation Systems. Irrigation systems are typically inspected monthly to ensure proper function and avoid conditions including leaks (e.g., from broken lines or sprinkler heads), erosion from concentrated flows, ponded water, and overwatering (e.g., during rain events) or under-watering. Associated maintenance generally involves as-needed system adjustments and repair/replacement of applicable facilities.

Signs/Stencils. Inspections are generally conducted annually to ensure legibility, with associated maintenance including as-needed repairs or replacement of faded, vandalized or otherwise illegible signs, stencils or other labeling facilities.

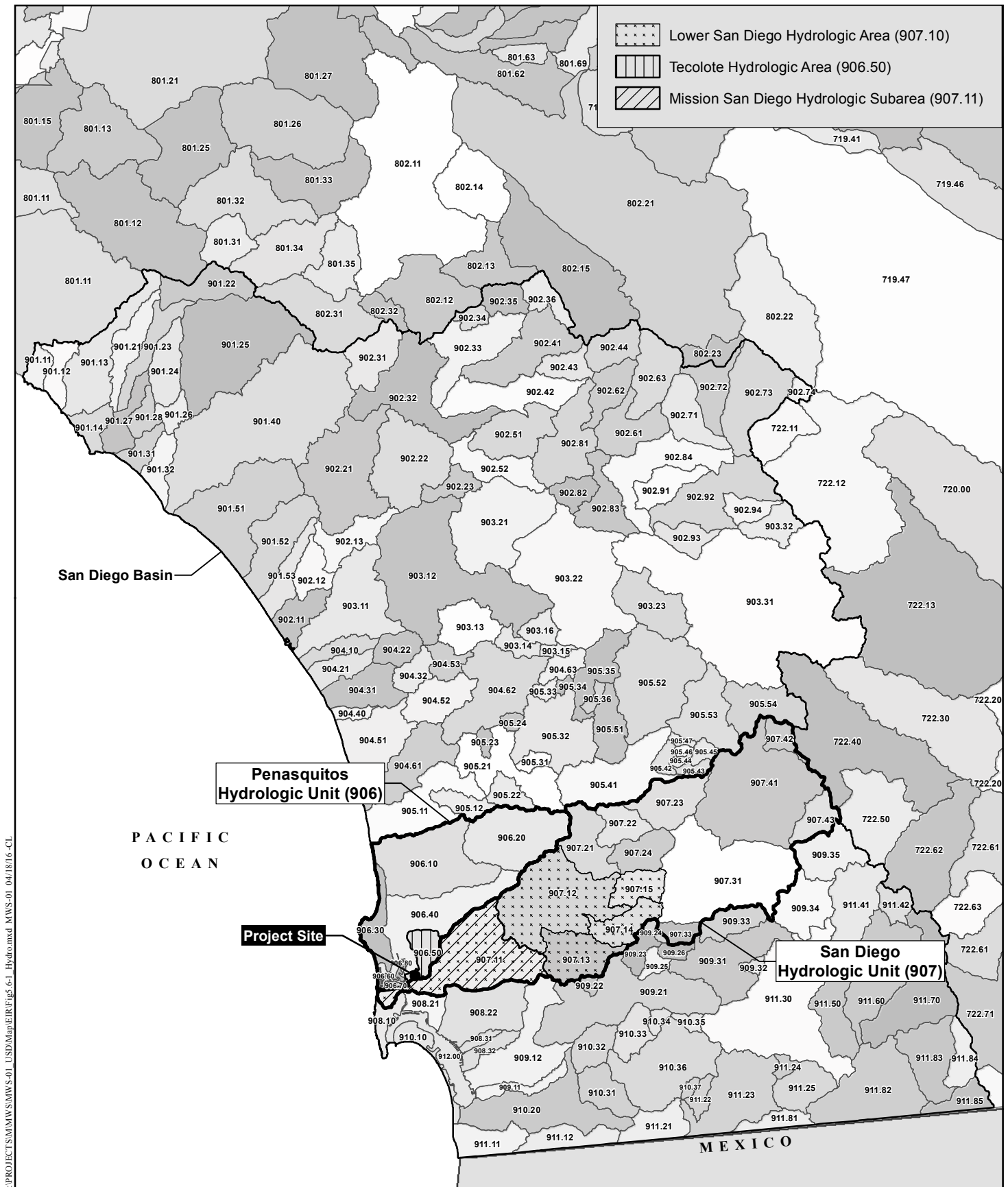
Bio-filtration Facilities. Inspections are typically conducted, annually and after major storm events, to identify: (1) accumulation of sediment, litter and/or debris at inlets/outlets; (2) standing water; (3) excess or inadequate vegetation cover; (4) erosion; and (5) damaged structural components. Ongoing maintenance generally includes removal (and proper disposal) of accumulated materials (e.g., sediment and debris), vegetation mowing/trimming or replanting/reseeding, erosion control/repair, elimination of standing water (and causes, such as irrigation or topographic adjustments), as-needed structural repairs, and identification of additional maintenance/cleaning services if applicable.

Significance of Impact

Based on the implementation of Master Plan Update design elements, including construction and post-construction BMPs/maintenance efforts, as well as required conformance with City storm water standards and related requirements (including the NPDES Construction General, Municipal and Groundwater permits, and applicable hazardous material regulations), potential construction and long-term Project-related water quality impacts would be less than significant.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.



Project Location within Local Hydrologic Designations

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

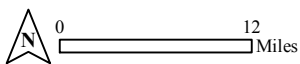


Figure 5.6-1

5.7 Public Utilities

Public utilities technical studies prepared for the Master Plan Update include a Water Supply Assessment Report (City 2016e), Water Study (KLE 2016a), Sewer Study (KLE 2016b), and Waste Management Plan (WMP; HELIX 2016b). These technical studies are included in Appendices H, I, J, and K, respectively, and are summarized below along with other applicable information.

5.7.1 Existing Conditions

Water Supply and Conservation

Water service to the campus is provided by the City's Public Utilities Department (PUD). The PUD serves more than 1.38 million people with a water system extending over 404 square miles. The City currently purchases most of its potable water from the San Diego County Water Authority (SDCWA), a wholesale water agency providing imported water to its 24 member agencies in San Diego County (City 2016a). The SDCWA, in turn, purchases water primarily from the Metropolitan Water District of Southern California (MWD).

Potential water supply offsets such as conservation and water reclamation have only recently entered the water supply picture, but even the most optimistic projections credit those offsets with no more than 20 to 25 percent of total demand. San Diego will therefore continue to rely heavily upon imported water far into the foreseeable future (City 2016a). Below is a summary of these water supply sources. In addition, a description of events affecting the water supply sources and site-specific historical water usage are provided.

Metropolitan Water District of Southern California

MWD is a consortium of 26 cities and water districts that provides drinking water to nearly 19 million people in parts of Los Angeles, Orange, San Diego, Riverside, San Bernardino and Ventura counties. MWD currently delivers an average of 1.7 billion gallons of water per day to a 5,200-square-mile service area (MWD 2016). MWD imports its water from two main sources — the Colorado River (via the Colorado River Aqueduct [CRA]) and the Sacramento and San Joaquin Rivers (via the State Water Project [SWP]). Together, these two sources provide approximately 45 percent of Southern California's water; the remainder comes from various local sources. The CRA is owned and operated by MWD, and extends approximately 242 miles from the Colorado River at Lake Havasu to Diamond Valley Lake in Riverside County. From there, a series of canals, siphons, pipelines and pump stations moves water west to several MWD reservoirs for local distribution. The State Water Project (SWP) is owned by the State of California and operated by the State Department of Water Resources. The MWD receives water from northern California via the California Aqueduct, which extends approximately 444 miles south from the Sacramento-San Joaquin Delta (along with a series of related dams/reservoirs, pumping plants, canals and siphons (MWD 2016a).

Additional water sources currently or potentially available to MWD include local supplies, groundwater banking, water transfers, seawater desalination, and water recycling. All MWD water sources area also supplemented by conservation efforts such as public education programs and rebates for high efficiency appliances and landscaping (MWD 2016a).

Through its 2010 Integrated Resources Plan (IRP), MWD identifies a mix of imported and local resources to provide long-term water supplies, including a planning buffer intended to address potential future supply and demand fluctuations (MWD 2016b).

A record low Sierra Nevada snowpack in 2015 followed dry conditions in California in 2013 and 2014, triggering a historic set of water management actions throughout the state. In April 2015, Governor Jerry Brown ordered the first-ever statewide mandatory conservation targets for cities and a 25 percent reduction in urban water use compared to 2013 levels. In response, through its allocation plan, MWD enacted reductions in water deliveries to its 26 member agencies, effective July 1, 2015 (MWD 2016c).

San Diego County Water Authority

The SDCWA is an independent public agency that serves as a wholesale water supplier to its 24 member agencies; it supplies 97 percent of the population of San Diego County, in a service area of over 952,000 acres. The City, with 210,726 acres, is the largest service area within the SDCWA service area. Water supplies utilized within the SDCWA service area primarily originate from water purchased by the SDCWA from MWD.

The SDCWA operates and maintains a regional water delivery system capable of delivering as much as 900 million gallons per day (mgd) of water. This system consists of 300 miles of large diameter pipeline, 1,600 aqueduct-related structures, approximately 100 metering/flow control facilities, a 100-mgd state-of-the-art water-treatment plant, hydroelectric facilities, pump stations, flow regulatory structures, and a dam with a 24,000-acre-foot reservoir (SDCWA 2016).

MWD is SDCWA's largest supplier, but SDCWA has made significant progress since the 1990s in diversifying San Diego's regional water supply portfolio and expanding and adding surface storage reservoirs of emergency and seasonal water storage to improve the region's vulnerability to shortages from the Colorado River and the SWP. By 2013, the SDCWA had reduced its 95 percent dependency on water purchases from the MWD to 46 percent. The balance is now comprised of water purchased from the Imperial Irrigation District (currently 100,000 acre-feet per year [AFY] of Colorado River water with high priority rights), new water as a result of a conservation project to line portions of the All-American and Coachella Canals (77,700 AFY), enhanced water conservation by consumers, and the development of additional local supplies such as groundwater and recycled water.

The SDCWA has actively pursued a strategy of supply diversification that includes the acquisition and importation of additional water supplies, the development of additional local water supply projects, and augmentation of its water supply via local and regional water storage capacity. This is supplemented by continuation of demand side management programs. The SDCWA intends to increase local water use to approximately 40 percent of total supply by 2020. In December 2015, SDCWA added desalinated water to its supply portfolio, with the completion of a 50-mgd seawater desalination facility, which is expected to provide another 56,000 AFY of a drought-proof water supply for the San Diego region (City 2015). The development of new regional and local water supplies in San Diego County will result in decreased reliance on imported water from the Colorado River and Bay-Delta, and thus increase reliance for this region (City 2016c).

City of San Diego Public Utilities Department

The PUD treats and delivers more than 200,000 AFY of water to more than 1.3 million residents. During the past five years, from 2011 to 2015, imported water represented 87 percent of the City's overall water supply (including recycled water, but excluding savings from water conservation). In addition, it uses three local supply sources to meet or offset potable demands: local surface water, conservation, and recycled water. In addition to delivering potable water, the City has a recycled water use program and associated infrastructure; however, this program and related facilities are not available in the Project area (City 2016c).

The PUD maintains and operates nine local raw water storage reservoirs (which capture local runoff from rainfall and store purchased imported water), three water treatment plants, more than 3,293 miles of water lines, 50 water pump stations, more than 128 pressure zones, and more than 200 million gallons of potable water storage capacity in 32 treated water storage facilities, including standpipes, elevated tanks, and concrete and steel reservoirs.

The PUD also implements a conservation program aimed at reducing water use, through the Water Conservation Program which accounts for over 13,793 AFY of potable water savings in 2015. Depending on conditions, this savings can be as much as 20 percent of raw water purchases annually. Water savings have been achieved by creating a water conservation ethic, adopting programs and policies designed to promote water conservation practices, and implementing comprehensive public information and educational campaigns.

In June 2016, the City adopted its 2015 Urban Water Management Plan (UWMP) (City 2016c) that concludes that the PUD will have sufficient water supplies to serve the City under average, single-dry year, and multiple-dry year conditions through the year 2040 (City 2016c).

Events Affecting Water Supply and Conservation

Several recent events may affect water supplies to the San Diego region, including a December 2007 Record of Decision on the operation of the Colorado River, several federal district court decisions regarding the operation of the SWP with respect to the Delta smelt and Delta salmon (i.e., *Natural Resources Defense Council [NRDC], et al. v. Kempthorne, et al.*), and developing understanding of the potential for global climate change to impact California water supplies. In December 2007, the MWD Board of Directors authorized a series of four agreements that allowed for the implementation of federal guidelines for how water shortages are to be shared amongst the seven states that rely upon the Colorado River for water supplies. Despite the noted uncertainties, MWD and SDCWA have concluded that water supplies are anticipated to be available to meet projected demand under normal, dry-year, and multiple-dry year conditions during a 20-year planning horizon.

Effective July 1, 2014, the City moved to Level 1 Drought Alert. The Level 1 Drought Watch Condition lists voluntary water conservation measures that were added to the City's existing permanent restrictions. Additionally, effective November 1, 2014, the City enacted a Drought Alert status, the second phase of citywide conservation that calls for mandatory water use restrictions in response to the severe drought conditions statewide.

In addition to all the conservation measures, in February 2016, the State of California revised the City's conservation target to 8 percent of its 2013 water use. Utilizing existing potable water and/or

irrigation meters City-wide would be subject to any City Council drought actions to conserve water, if enacted by City Council.

Water Supply Regulatory Framework

California Senate Bill 610

The California Water Code Sections 10910 through 10915 were amended by the enactment of SB 610 in 2002. SB 610 requires an assessment of whether available water supplies are sufficient to serve the demand generated by a proposed project, as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under average normal year, single dry year and multiple dry year conditions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912 [a]) subject to CEQA. For the purposes of SB 610, "project" means any of the following:

1. A proposed residential development of more than 500 dwelling units.
2. A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
3. A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
4. A proposed hotel or motel, or both, having more than 500 rooms.
5. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
6. A mixed-use project that includes one or more of the projects specified in this subdivision.
7. A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The Master Plan Update would develop academic core/student service/support uses, athletics and recreational uses, and additional student housing totaling approximately 922,930 GSF of uses, which would meet the criteria as a "project" under SB 610 for categories 3 and 7. Based on this conclusion, a WSA (Draft EIR Appendix H) has been prepared by PUD for the Project in conformance with SB 610 requirements.

California Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, requires the California Department of Water Resources (DWR) to prepare an updated Model Water Efficient Landscaping Ordinance (Model Ordinance) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated Model Ordinance or a local landscape ordinance that is at least as effective in conserving water as the Model Ordinance. In response, the City amended its Landscape Regulations (SDMC Chapter 14,

Article 2, Division 4) and Landscape Standards in November 2009. The Landscape Standards implement the requirements of the Landscape Regulations. All landscape plans and installations are required to be in compliance with the Landscape Standards.

City of San Diego Ordinance 0-17327 (Mandatory Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that “recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment.” Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc., based on the project’s location within an existing or proposed recycled water service area.

Water Infrastructure

Regional

As mentioned above, the PUD provides water service to the campus. The water infrastructure in the City’s service area includes nine surface raw water storage reservoirs (Barrett, El Capitan, San Vicente, Hodges, Miramar, Murray, Lower Otay, Upper Otay, and Sutherland), pipeline connections to SDCWA aqueducts, three water treatment plants (Alvarado, Miramar, and Otay), 32 treated water storage facilities, 3,293 miles of water transmission and distribution pipelines, and 20 water pump stations. Since much of the City’s water system was constructed 100 years ago, many deficiencies exist. The City developed a Strategic Plan for Water Supply (1997b) to address this infrastructure issue. The strategic plan outlines needed repairs, replacements, and upgrades to the City’s water infrastructure system. An outcome of the City’s 1997 Strategic Plan for Water Supply, which focused mainly on the development of a CUP, was the realization that the City should become more engaged in the planning and development of its own water supply in order to become less reliant on imported water. Prior to the strategic planning process, the City had relied almost entirely on the SDCWA to plan for, and acquire necessary water supplies (City 2002b). Many of the planned improvements have been completed or are currently under construction.

The City produces reclaimed water at the North City Water Reclamation Plant (NCWRP) and the South Bay Water Reclamation Plant (SBWRP). The northern region of San Diego is served by approximately 94 miles of recycled water pipeline, two reservoirs, and two pump stations to provide reclaimed water for irrigation, landscaping and industrial use. Reclaimed pipelines, sprinkler heads, meter boxes and other irrigation equipment are color-coded purple to distinguish reclaimed water pipes from drinking water systems.

The campus is not within the recycled water system service area (City 2016d).

University of San Diego

The 390 zone and the 559 zone are the two different water pressure zones located within the campus. The eastern portion of the campus (consisting of the areas bound by Linda Vista Road to the south, the east entrance to the west and Via Las Cumbres to the east) is split in two major areas by the existence of the two different water pressure zones. The most easterly portion of the campus is served by the high-pressure zone (i.e., the 559 zone) and is connected via 8-inch water mains on campus to a 10-inch water main in Via Las Cumbres and a 12-inch water main in Linda Vista Road.

The western portion of this part of campus (including the Jenny Craig Pavilion, Mission Apartments, the Seminary and the San Antonio De Padua) is the low pressure zone (i.e., the 390 zone) and is connected via a single 12-inch main on campus that connects to the existing 12-inch main in Linda Vista Road. The western portion of the USD campus is also served by the 390 zone. Existing 8-inch and recently completed 12-inch public water mains located within an 80-foot public water easement serve the western portion of the USD campus, providing, water irrigation and fire services, and fire hydrants.

Water facilities have been constructed, removed and/or modified as the campus has expanded. Although a majority of the campus improvements were processed through the City for approval, some existing public water facilities do not meet current City standards, as identified, summarized and agreed upon in the 2008 Update Master Water Study. This study identified nine specific public water improvements to be constructed over several years in five phases. To date, Phase 1 through Phase 5A have been completed. Phase 5B consists of the middle and easterly portions of a project to upsize the existing 8-inch to 12-inch public mains from Marian Way to Linda Vista Road in three sub-phases; Phase 5B was constructed by the City during the summer of 2016.

Wastewater Infrastructure

Regional

Wastewater treatment service to the campus is provided by the PUD, which collects, treats and disposes of nearly 180 mgd of sewage from the City's wastewater customers, as well as from 12 cities/agencies in a 450-square-mile area with a service area population of over 2.2 million. The PUD also has a separate recycled water system that currently extends over 90 miles. The City's two water reclamation plants currently provide recycled water to meet non-potable water demands. In Fiscal Year 2015, the PUD provided 8,195 AFY of non-potable recycled water within the City and 4,232 AFY to three wholesale customers.

The NCWRP is the first large-scale water reclamation plant in San Diego's history and part of the single largest sewerage system expansion in the area in more than 35 years. This facility can treat up to 30 mgd, which is generated by northern San Diego communities. Wastewater entering the plant undergoes a series of treatment and purifying steps using the latest technologies to supplement the water supply of the region (City 2016d).

University of San Diego

The Tecolote Canyon basin (which is further divided into five sub-basins), the Linda Vista Road basin, and the Morena basin are the campus' three major sewer basins. Most of the campus is located within the Tecolote Canyon basin. The sewer connects to the existing trunk sewer located in Tecolote Canyon. The Linda Vista Road and Morena sewer basins are relatively small and primarily serve the southern portion of campus closest to Linda Vista Road and the southwestern portions of campus closest to Morena Boulevard, respectively. The majority of the sewer facilities (sewer mains and sewer laterals) located on the campus are private. Public sewer facilities are located on the eastern portion of the campus adjacent to Via Las Cumbres, and within San Dimas Avenue and Santa Paula Drive within the Tecolote Canyon Basin. A portion of the existing 8-inch sewer main located in Josephine Street within the Linda Vista Road basin is also public.

The private sewer facilities within each sub-basin of the Tecolote Canyon basin connect to an existing public sewer main at the boundary of the campus (refer to Exhibit A of Appendix J). The three most westerly public sewer mains are located on the north side of the campus near the top of the existing slope that extends north into Tecolote Canyon. The fourth existing public sewer main is located adjacent to the northeast boundary of the campus (northeast of the existing softball field). This existing sewer line connects to the trunk sewer located in Tecolote Canyon. Finally, the fifth existing public sewer main serving the campus is located within Via Las Cumbres. This existing 8-inch sewer main traverses north in Via Las Cumbres before traversing northwesterly and connecting to the fourth existing public sewer main. All sewer flows from the portion of the campus draining into the Tecolote Canyon sewer basin is collected in the existing 18-inch trunk sewer (DWG 4608-D) located in Tecolote Canyon. Sewer facilities within the Linda Vista Road basin connect to an existing 8-inch public sewer main located in Josephine Street, which then traverses across Linda Vista Road. Sewer facilities within the Morena basin connect to an existing 8-inch public sewer main located in Cushman Avenue.

Solid Waste Management

Solid waste collection in the project area is provided by the City Environmental Services Department (ESD) and private collectors. The City provides refuse collection for certain residences that are located on dedicated public streets. Other customers pay for service by private hauling companies that are franchised by the City.

Refuse collected from the area is generally taken to the Miramar Landfill. According to the Solid Waste Information System (SWIS) database maintained by the California Department of Resources Recycling and Recovery (CalRecycle), the Miramar Landfill has a remaining capacity of approximately 15,527,878 cubic yards of solid waste as of June 30, 2014. Based on the remaining capacity and disposal rates, the Miramar Landfill is expected to close August 31, 2025 (CalRecycle 2016); however, the amount of waste managed at the landfill is expected to decrease while the amount of composting and recycling will increase over time as the City strives to achieve the target 75 percent diversion rate identified in the City's Zero Waste Plan and AB 341 and 1826.

Two other landfills, Sycamore Landfill and Otay Landfill, provide disposal capacity within the urbanized region. The Sycamore Landfill is located to the south of Marine Corps Air Station (MCAS) Miramar within the East Elliot Community Plan area of the City. The Otay Landfill is located within an unincorporated island within the City of Chula Vista. The SWIS database indicates that the Sycamore Landfill has a remaining capacity of 39,608,998 cubic yards as of December 31, 2014, and is expected to close December 31, 2042. The Otay Landfill has a remaining capacity of 24,514,904 cubic yards as of March 31, 2012, and is expected to close February 28, 2028 (CalRecycle 2016).

Waste generated on campus is either disposed or diverted. Methods of waste diversion include recycling, composting, and source reduction (not generating waste). Waste Management, a private waste hauler, provides waste collection services to the USD campus. These services include the collection of solid waste, recyclables, and green waste. The overall waste diversion rate provided by Waste Management was 45.6 percent in 2015. Additional recycling and sustainability programs add to the overall diversion rate achieved on campus. USD has an extensive list of conservation and recycling programs currently in operation throughout the campus that include: mixed paper recycling bins in all offices, classrooms and libraries; commingled aluminum, metal, glass, and plastic bottles and cans recycling bins; corrugated cardboard recycling; carpet recycling; wood pallet

diversion; waste oil recycling; anti-freeze recycling; event recycling (sports games, student events, etc.); green waste recycling; material recovery (redistribute, reuse, or donate surplus office supplies, equipment, and furniture); water conservation (low-flow showerheads, faucets, toilets, timed irrigation, etc.); and energy conservation ("Green Lights Program"; HELIX 2016b). It is estimated that the current diversion rate on campus is closer to 60 percent with the implementation of these programs.

USD has a single-stream recycling system for commingled mixed paper, aluminum, metal, glass, and plastic bottles and cans recycling with pick-up service by Waste Management. Waste Management separates the commodities at their transfer station located in El Cajon. In addition, the USD Electronic Recycling Center offers recycling of electronic waste (computers, printers, etc.), batteries, toner cartridges, fluorescent tube, and compact fluorescent bulb and ballast to the USD community and the public. Over 1.6 million pounds of electronic waste have been collected since it opened in April 2011. The majority of green waste generated on campus is chipped on site and used as mulch in the grounds areas; excess green waste that is not used to produce mulch is exported off-campus to the Miramar Greenery (HELIX 2016b). An estimated 300 cubic yards (or 81 tons) of green waste is typically exported annually, with approximately 64.28 tons collected by Waste Management in 2015.

The main dining area at USD (Pavilion Dining) utilizes a BioHiTech Food Digester that transforms 3,200 pounds of food waste into grey water each week. Food waste is added to the digester continuously throughout the day. The digester uses a highly specialized formula of micro-organisms and water to break down food waste into grey water, which is then disposed into the sewer system to be treated as wastewater. The digester reduces the amount of solid waste for disposal, eliminating the need for composting, diverting waste from landfills and decreasing fuel consumption. In addition, the campus currently has a small pilot composting program at the Missions Café, which composts all pre- and post-consumer food scraps, diverting over 100 pounds of food waste per week from the landfill and supporting the USD Community Garden.

Solid Waste Regulatory Framework

The State of California Integrated Waste Management Act (IWMA) of 1989 [California AB 939], which is administered by CalRecycle, requires counties to develop an Integrated Waste Management Plan (IWMP) that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve the waste diversion goals. IWMPs compile Source Reduction and Recycling Elements (SRREs) that are required to be prepared by each local government, including cities. SRREs analyze the local waste stream to determine where to focus diversion efforts, and provide a framework to meet waste reduction mandates. The goal of the solid waste management efforts is not to increase recycling, but to decrease the amount of waste entering landfills. AB 939 required all cities and counties to divert a minimum 50 percent of all solid waste from landfill disposal.

In 2011, the State legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 also requires the provision of recycling service to commercial and residential facilities that generate 4 cubic yards or more of solid waste per week.

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food

waste. For businesses that generate 8 or more cubic yards of organic waste per week, this requirement began on April 1, 2016, while those that generate 4 cubic yards of organic waste per week must have an organic waste recycling program in place beginning January 1, 2017. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units, starting on January 1, 2016. Mandatory recycling of commercial organics would be phased in over time, and an exemption process is available for rural counties.

The City's Zero Waste Plan, a component of the City's Climate Action Plan, was approved and adopted by City Council on July 13, 2015. The Zero Waste Plan lays out strategies to accomplish the following goals:

- target 75 percent diversion by 2020, 90 percent diversion by 2035, and "zero" by 2040 through identification of potential diversion strategies for future action. To increase the City's waste diversion rate to 75 percent will require an estimated additional 332,000 tons per year to be diverted from landfill disposal;
- demonstrate continuous improvement towards a goal of zero waste to landfills;
- emphasize education by renewing City public information efforts;
- promote local policies and ordinances and legislation at the state level that encourage manufacturers, consumers, and waste producers to be responsible for waste;
- investigate appropriate new technologies; and
- re-emphasize market development at the local and state level.

The City's ESD estimates that compliance with existing City codes and ordinances alone (including the Refuse and Recyclable Materials Storage Regulations, Recycling Ordinance, and the Construction and Demolition Debris Deposit Ordinance) would achieve only an approximate 40 percent diversion rate, which is substantially below the current 75 percent diversion level targeted by the State and the goals of the City's Zero Waste Plan.

The Recycling Ordinance requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the approved recycling containers. The Construction and Demolition Debris Deposit Ordinance requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of the total waste generated by the project including how much will be recycled. The code requires a minimum diversion rate of 50 percent for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance, and a minimum diversion rate of 75 percent for building permits or demolition/removal permits issued after 180 calendar days from the effective date of the ordinance, provided that a certified recycling facility which accepts mixed construction and demolition debris is operating within 25 miles of the City Administrative Building.

The City's Significance Determination Thresholds requires all new development projects that propose to construct, demolish, and/or renovate at least 40,000 square feet of building space to

prepare a WMP that addresses disposal of waste generated during short-term demolition and construction and long-term post-construction operation. Because the Project exceeds this threshold, a WMP was prepared as described below and contained in Appendix K.

5.7.2 Impact

Issue 1: Would the proposal result in the need for new water or sewer systems or require substantial alterations to existing utilities, the construction of which would create physical impacts?

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

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), public utility impacts may be significant if the project would:

- Use excessive amounts of potable water;
- Use predominantly non-drought resistant landscaping and excessive water usage for irrigation and other purposes;
- Cause a significant increase in demand for public utilities; and/or
- Result in direct impacts from the construction of new or expanded public utilities needed to serve the proposed project; and/or
- Construct, demolish, and/or renovate 1,000,000 square feet or more of building space, which would generate approximately 1,500 tons or more of waste. For projects over 1,000,000 square feet, a significant direct solid waste impact would result if compliance with the City's ordinances and the WMP fails to reduce the impacts of such projects to below a level of significance and/or if a WMP for the project is not prepared and conceptually approved by the ESD prior to distribution of the draft environmental document for public review.

In addition, the City's Significance Determination Thresholds note the following guidance should be considered in determining whether utility work could have significant environmental effects.

Would removal, construction, and/or relocation of the utility:

- Be compatible with existing and adjacent land uses?
- Change drainage or affect water quality/runoff?
- Affect air quality?
- Affect biological resources including habitat?

- Have a negative aesthetic affect?
- Increase noise levels to existing receptors?

Impact Analysis

Previously Disclosed Public Utilities Impacts from the 1996 Master Plan FEIR

The 1996 Master Plan FEIR briefly assessed potential impacts related to public utilities from phased buildout of the campus through the year 2030. The analysis concluded that development associated with the Master Plan would not result in the need for new or substantial alterations to existing utilities, such as electricity, gas, water, sewer, solid waste or storm water drainage.

Impacts from the Master Plan Update

The following discussion focuses on the potential water and wastewater impacts associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Water Supply and Conservation

Water Supply and Demand. As previously described, a WSA was prepared for the Project, which is contained in Appendix H, to determine if there is sufficient water supply to serve existing demands, projected demands of the Project, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. PUD water demand projections are based on the SANDAG Series 13 Regional Growth Forecast and are incorporated into the City's 2015 UWMP. The projections are then utilized by the SDCWA for use in preparation of their UWMP, which is further incorporated into MWD's UWMP to calculate regional water demands.

The projected water demands of the Project compared to the planned water demands of the Project site per the City's 2015 UWMP and SDCWA's 2015 UWMP are identified in Table 5.7-1, *Projected Versus Planned Water Demands For The Project*, below. As shown, the total projected water demand for the Project is 281,900 gallons per day (gpd) (315.8 AFY), and the planned demand is 75,180 gpd (84 AFY). The WSA notes that the difference (206,720 gpd or 231.8 AFY) is accounted for through the Accelerated Forecasted Growth demand increment of the SDCWA's 2015 UWMP. As documented in the 2015 UWMP, the SDCWA utilizes the Accelerated Forecasted Growth demand increment to demonstrate adequate supplies for future and existing development. Therefore, based on the City's 2015 UWMP and the SDCWA's 2015 UWMP, the Project would not result in unanticipated water demands and there would be sufficient water planned to supply the Project's estimated annual average usage.

Table 5.7-1 PROJECTED VERSUS PLANNED WATER DEMANDS FOR THE PROJECT		
Water Demands	Amount	
	gpd	AFY
Projected Demands	281,900	315.8
Planned Demands – City's 2015 UWMP	75,180	84
Planned Demands – County's 2015 UWMP	206,720	231.8
Net Unanticipated Demands	0	0

Source: City 2016e

gpd = gallons per day; AFY = acre feet per year

The Project WSA also concludes that MWD, SDCWA, and PUD would have adequate water supplies to meet long-term future demands, including those associated with the proposed project (City 2016e). Summary assessments of projected water supply and demand conditions in the City (including the proposed Project) under normal, single-dry year, and multiple-dry year conditions are provided in Tables 5.7-2 (*Projected Water Supply and Demand - Normal Year Conditions*), 5.7-3 (*Projected Water Supply and Demand – Single-Dry Year Conditions*), and 5.7-4 (*Projected Water Supply and Demand – Multiple-Dry Year Conditions*).

Table 5.7-2 PROJECTED WATER SUPPLY AND DEMAND - NORMAL YEAR CONDITIONS (AFY)					
	2020	2025	2030	2035	2040
Total Supply	200,984	242,038	264,840	273,748	273,408
Total Demand	200,984	242,038	264,840	273,748	273,408
Difference	0	0	0	0	0

Source: City 2016e

Table 5.7-3 PROJECTED WATER SUPPLY AND DEMAND – SINGLE-DRY YEAR CONDITIONS (AFY)					
	2020	2025	2030	2035	2040
Total Supply	213,161	256,883	281,167	290,654	290,292
Total Demand	213,161	256,883	281,167	290,654	290,292
Difference	0	0	0	0	0

Source: City 2016e

Table 5.7-4 PROJECTED WATER SUPPLY AND DEMAND – MULTIPLE-DRY YEAR CONDITIONS (AFY)					
	2020	2025	2030	2035	2040
Multiple Dry Year - First Year Supply					
Total Supply	213,161	256,883	281,167	290,654	290,292
Total Demand	213,161	256,883	281,167	290,654	290,292
Difference	0	0	0	0	0
Multiple Dry Year - Second Year Supply					
Total Supply	200,610	241,581	264,338	273,228	272,888
Total Demand	200,610	241,581	264,338	273,228	272,888
Difference	0	0	0	0	0
Multiple Dry Year - Third Year Supply					
Total Supply	208,665	251,402	275,139	284,412	284,058
Total Demand	208,665	251,402	275,139	284,412	284,058
Difference	0	0	0	0	0

Source: City 2016e

Pursuant to the WSA conditions and assumptions outlined above, the Project would be consistent with MWD/SDCWA supply/demand projections. Therefore, there would be sufficient water supply over a 20-year planning horizon to meet the projected demands of the Project, as well as other existing and planned development projects within the PUD service area in normal, single-dry year, and multiple-dry year forecasts.

Water Infrastructure

As described above in Section 5.7.1, public and private water mains are located throughout the campus and adjacent areas. Water facilities have been constructed, removed and/or modified to accommodate demand within the area. All public water improvement projects identified in the 2008 Updated Master Water Study have been completed. Beyond the improvements associated with Project 5B, the City PUD's analysis of the hydraulic characteristics of the existing water facilities that serve the campus concluded that all City design standards have been met and no additional improvements to the public water system on campus are required (KLE 2016a). Moreover, the uses, buildings and facilities proposed by the Master Plan Update would be consistent with existing campus facilities. Landscaping would be drought-tolerant and not consist of large expanses of turf or other water-demanding treatments. Based on these considerations, the Master Plan Update would not result in the need for new water systems or require substantial alterations to existing facilities that would result in adverse physical impacts.

Wastewater Infrastructure

This discussion is based on the Master Plan Update sewer study (KLE 2016b), approved by the City on May 24, 2016 and contained in Appendix J. As described above in Section 5.7.1, three major sewer basins occur within the campus: Tecolote Canyon basin, Linda Vista Road basin, and Morena basin. The Master Plan Update project sites are located throughout the campus and occur within the three major sewer basins shown in Table 5.7-5, *Master Plan Update Project Locations by Sewer Basin*.

Table 5.7-5 MASTER PLAN UPDATE PROJECT LOCATIONS BY SEWER BASIN	
Site No.	Project Description
Tecolote Canyon Sewer Basin	
1	Approved as Sports Park; Tennis Center; Renamed Athletics/Administrative/ Underground Parking
5	Approved as Olin Hall Expansion with underground parking; Renamed Academic/ Administrative Building with Structured Parking
11	Approved as Renovation to Missions; Renamed Housing/Student Services
17	Trails/Landscape Enhancements
20	Academic/Administrative/Support
21	Academic/Administrative/Student Services Building
24	New Housing/Student Services/Parking
27	Housing/Student Services
28	Athletics/Administrative
29	Facilities/Athletic Support
30	New Student Housing/Student Services/Parking/Athletics
Linda Vista Road Sewer Basin	
22	New Academic/Administrative Building (four stories to match Shiley Hall)
23	New Housing/Parking Structure
25	Proposed Academic/Administrative/Parking Building
26	Engineering Expansion of Loma Hall; Proposed Academic/Administrative Building
Morena Sewer Basin	
18	Parking/Administrative/Physical Plant; two levels above ground
19	Plaza/Mall/Bridge

Source: KLE 2016b

Note: Projects 1, 5, and 11 were previously approved as part of CUP 92-0568, but are accounted for in the Project sewer study because they remain unbuilt and would contribute wastewater in the future.

The project sites identified in the Master Plan Update would be designed with wastewater infrastructure that would connect to and operate consistently with existing wastewater infrastructure. All proposed sewer mains and laterals within the campus limits would be private, except for a portion of sewer infrastructure near Josephine Street that is currently public and would be converted to private under the Project. All new sewer facilities would connect to existing public mains.

Project Site No. 30 may require a new lateral line connecting to the existing public sewer within Via Las Cumbres. Alternatively, the project site may connect to the existing private sewer main located between Jenny Craig Pavilion and the baseball field. This decision would be made during the final design of the project. A new public sewer main may be needed within Linda Vista Road to replace the existing public main within Josephine Street, which would need to be relocated due to implementation of Project Site No. 23, depending on the circumstances at the time the project moves forward, as described below.

Based on the analysis of the existing public on-site wastewater facilities that ultimately connect to the Tecolote Trunk Sewer System (i.e., the existing sewer in Via Las Cumbres and the Tecolote Trunk Sewer within the Tecolote Canyon basin), PUD concluded that these facilities meet the City's Sewer Design Guide standards (KLE 2016b). Hydraulic calculations conducted as part of the project sewer study for the existing public off-site wastewater facilities located within the Linda Vista Road basin,

south of Linda Vista Road (from Linda Vista Road to the existing 15-inch sewer main located in Gaines Street) indicated that two existing sewer reaches (i.e., reaches 10 and 11) do not meet the City's Sewer Design Guide standards for the proportional depth of flow (i.e., sufficient velocity of flow to prevent deposition and provide sufficient ventilation) (refer to Exhibit D of Appendix B in the project sewer study, included as Appendix J of the SEIR). Development of the project sites in this sewer basin (identified in Table 5.7-1, above) may increase the amount of sewer flow within the Linda Vista Road sewer basin, and would further degrade the functioning of these reaches. In addition to the two non-standard reaches, potential impacts could occur at reaches 12 and 13. In order to accommodate current and future needs and ensure that reaches 10 through 13 meet the City's Sewer Design Guide standards, the sewer main within these reaches would need to be upsized to a 10-inch main. The timing of that upsizing cannot be determined at this time because it is dependent on the timing of the University's campus buildout. Based on these considerations, any alterations to existing facilities would not result in adverse physical impacts because of their locations within existing roads and developed areas.

Significance of Impact

Water Supply and Conservation

The Project would be consistent with MWD/SDCWA supply/demand projections and applicable water supply regulations. There would be sufficient water supply over a 20-year planning horizon to meet the projected demands of the Project, as well as other existing and planned development projects within the PUD service area in normal, single-dry year, and multiple-dry year forecasts. Based on these conditions, less than significant impacts related to potable water supplies/demand would result from Project implementation.

Water Infrastructure

The Project would connect to existing water lines adjacent to the campus, and would not require any off-site pipeline upsizing or new water facilities. On-campus water infrastructure would be designed and sized to meet the Project's water needs in conformance with City standards. Therefore, Project impacts to water infrastructure would be less than significant.

Wastewater Infrastructure

Development of the Project Site Nos. 22, 23, 25 and 26, located within the Linda Vista Road sewer basin, may increase the amount of sewer flow within the basin and contribute to the reduced functioning of reaches 10 through 13. Potentially significant impacts to the functioning of these reaches are identified.

Mitigation, Monitoring, and Reporting

Water Supply and Conservation

No mitigation measures would be required.

Water Infrastructure

No mitigation measures would be required.

Wastewater Infrastructure

The following mitigation measure has been identified to ensure that the Master Plan Update contributes its fair share to the required wastewater infrastructure improvements, should the Master Plan Update project(s) proceed ahead of other projects. Implementation of the following measure would reduce wastewater infrastructure impacts from the Project to less than significant:

PU-1 Wastewater Infrastructure Improvements. Prior to issuance of the Building Permit for Project Site Nos. 22, 23, 25, and/or 26, located within the off-site Linda Vista sewer basin, the University shall conduct sewer flow metering of the undersized sewer mains. If the results of the sewer flow metering are different than those included in the Master Plan Sewer Study (KLE 2016b), the University shall present the results to the City PUD for review and approval. For each project located within the Linda Vista Road sewer basin that is calculated to result in increased flows to the undersized sewer main reaches 10 through 13, the University shall work with the City PUD to either:

- Determine appropriate phasing and potential cost sharing for the upsizing of sewer reaches 10 through 13 to 10-inch sewer mains; or
- Pursue redirecting, via a private sewer pump station, the project(s)'s sewer flows from the existing public off-site Linda Vista sewer system into the existing public Tecolote Canyon Trunk Sewer. If this option is pursued, the off-site Linda Vista undersized sewer mains would not be required to be upsized as part of the above mentioned campus projects.

5.7.3 Impact

Issue 3: Would the proposal have an effect upon, or result in a need for new or altered solid waste facilities?

Impact Thresholds

The City's CEQA Significance Determination Thresholds (2011) establish solid waste generation thresholds for discretionary projects. Specifically, a significant solid waste management impact would occur when a project would:

- Construct, demolish, and/or renovate 1,000,000 square feet or more of building space, which would generate approximately 1,500 tons or more of waste. For projects over 1,000,000 square feet, a significant direct solid waste impact would result if compliance with the City's ordinances and the WMP fails to reduce the impacts of such projects to below a level of significance and/or if a WMP for the project is not prepared and conceptually approved by the ESD prior to distribution of the draft environmental document for public review.

Projects that involve construction, demolition, and/or renovation that meet or exceed the thresholds described below are considered to have potentially significant solid waste impacts and require the preparation of a WMP.

Direct Impacts

Projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space may generate approximately 1,500 tons of waste or more during construction and demolition, and are considered to have direct impacts on solid waste services.

- Direct impacts result from the generation of large amounts of waste which stresses existing facilities. Waste management planning is based on a steady rate of waste generation and does not assume increased waste generation due to growth. While all projects are required to comply with the City's waste management ordinances, direct impacts are mitigated by the implementation of project-specific WMPs, which may reduce solid waste impacts to below a level of significance.
- For projects over 1,000,000 square feet, a significant direct solid waste impact would result if the compliance with the City's ordinances and the WMP fail to reduce the impacts of such projects to below a level of significance and/or if a WMP for the project is not prepared and conceptually approved by the ESD prior to distribution of the draft environmental document for public review.

LEED Projects Exceeding the Significance Thresholds

Projects that intend certification as U.S. Green Building Council (USGBC) LEED Silver or better would include LEED measures as part of their WMP. This would demonstrate implementation of sustainability measures intended to assure a minimal project "environmental footprint," including mitigating the types of impacts caused by waste generation.

Impact Analysis

Previously Disclosed Public Utilities Impacts from the 1996 Master Plan FEIR

As previously noted, the 1996 Master Plan FEIR briefly assessed potential impacts related to public utilities from phased buildout of the campus through the year 2030. The analysis concluded that development associated with the Master Plan would not exceed published national, state, or local standards relating to solid waste or litter control.

Impacts from the Master Plan Update

The Master Plan Update would involve construction of a total of 922,230 GSF that is estimated to generate 1,250.8 tons of solid waste. It is estimated 1,488.1 annual tons of solid waste would be generated upon operation of the new projects. Because the estimated solid waste generated by the project would exceed the threshold, a WMP was prepared by HELIX (HELIX 2016b), contained in Appendix K. The following analysis focuses on the potential solid waste impacts associated with the Master Plan Update.

The WMP identifies the amount of waste generated by the Project's grading and construction phase, as well as the Project's post-construction/ occupancy phase. Furthermore, the WMP describes project measures and design features that would reduce the amount of waste generated and how waste reduction and recycling goals would be achieved.

Construction of the 14 projects is estimated to generate 1,250.8 tons of solid waste associated with grading, building and infrastructure construction, as described below. Details of estimated construction solid waste generation and diversion rates by project are provided in Table 6 of the WMP, included as Appendix K.

Project Demolition, Clearing/Grubbing, and Grading

During pre-construction demolition, clearing/grubbing, and grading activities, the projects identified in the Master Plan Update would produce excavated soils, green waste, asphalt/concrete, and other construction and demolition waste.

The following types of demolition debris would likely be generated during construction: metals, concrete/asphalt, brick/masonry, masonry, wood, drywall, carpet/carpet padding, ceramic tile, roofing materials, doors, windows, and fixtures. Master Plan Update projects that propose demolition of existing structures include Project Sites Nos. 20, 23, 24, and 27.

Using existing campus waste management programs, such as source separation and salvage during demolition activities, a target diversion rate of 90 percent has been identified for demolition activities associated with the Master Plan Update. This is consistent with the waste diversion requirement for LEED Silver Certification, which all new buildings and additions on campus would be required to meet. Appropriate source separation techniques would be utilized during all demolition activities associated with future development under the Master Plan Update to achieve the 90 percent diversion rate. This would be verified during the SCR process as part of future project approvals, and would be consistent with the existing conditions for demolition of structures and facilities on campus. Each project would have to comply with the Master Plan Update WMP, as well as applicable waste management regulations and ordinances in place at that time the project moves forward. Demolition debris would be source separated and taken to the appropriate facilities provided in the City's *2016 Certified Construction & Demolition Recycling Facility Directory* (refer to Appendix K). In addition to source separation, each project would have a goal of 5 percent salvage of demolition materials for reuse onsite.

Prior to project construction, activities would include clearing/grubbing of existing vegetation, and removal of miscellaneous debris (e.g., trash, concrete, asphalt, gravel, and other debris, including negligible amounts of waste generated by contractors working on the site). Clearing and grubbing materials generated during site preparation activities would either be chipped on site and used for mulch on campus, or exported off site to the Miramar Landfill Greenery. As stated in the project WMP (Appendix K), other waste materials generated during clearing and grubbing would be source separated and taken to the appropriate facilities provided in the City's *2016 Certified Construction & Demolition Recycling Facility Directory*. This would achieve a 100 percent diversion rate.

Grading would be required for a number of projects identified in the Master Plan Update, particularly those proposing subterranean parking. Grading would be balanced on site to the extent practicable. Excavated soil that is not balanced on site would be diverted to one of the facilities from the City's *2016 Certified Construction & Demolition Recycling Facility Directory* (refer to Appendix K). This is consistent with the current practice for grading associated with development projects on campus.

Building and Infrastructure Construction

During construction, the projects identified in the Master Plan Update would collectively produce 1,250.8 tons of solid waste (metal, concrete, asphalt, brick/masonry, wood, drywall, carpet, carpet padding, mixed debris, and trash), and divert 1,056.25 tons of solid waste materials from the landfill over the lifetime of the Master Plan Update; thus, the net disposal quantity over a 20-year period would be 194.6 tons, and the overall diversion rate during construction would be approximately 84.5 percent. The diverted material would consist of clean, source-separated (segregated) recyclable and/or reusable material, as well as mixed debris, to be deposited at the recycling/reuse facilities identified in the City's 2016 *Certified Construction & Demolition Recycling Facility Directory* (HELIX 2016b). The approximately 194.6 tons of solid waste material generated during construction to be disposed of as non-recyclable/non-reusable waste would be deposited at Miramar Landfill. This would not represent a substantial change over existing practices and waste diversion rates for demolition of structures and facilities on campus.

To further minimize waste, Master Plan Update projects would be LEED Silver or equivalent and would utilize recycled content construction materials in accordance with the Design Guidelines in the Master Plan Update. An overall target of ten percent post-consumer recycled content is anticipated, with verification of purchase of materials equating to this target to be provided prior to construction. Prior to the issuance of any grading or construction permits for each project identified in the Master Plan Update, the written specifications for these materials would be required approval by ESD to ensure that the target recycled content is met, as required in the WMP.

Through its Office of Sustainability, USD already implements a number of sustainability initiatives, identified in the Master Plan Update. The Master Plan Update encourages each building program and site design to address their specific means of contributing to the highest possible sustainable design, construction, operations, and maintenance standards as appropriate. Each project would promote recycling and waste management and support sustainable procurement. The following Master Plan Update strategies (from Section 8.15, Sustainability, of the Master Plan Update) support a more sustainable campus with respect to waste management and diversion at the building design and construction stage. Specific and measurable goals and standards related to these strategies are provided in the WMP, including the following elements from the project design cited in the WMP which would be verified as part of the SCR process for each Master Plan Update project that proceeds.

- New buildings shall be designed to meet LEED Silver (or equivalent) standards.
- All proposed building projects shall be constructed with high-quality and durable building materials to minimize the replacement costs and construction waste that result from periodic renovations.

After diversion, the overall net construction waste anticipated to be generated upon implementation of all projects identified in the Master Plan Update (including project demolition, clearing/grubbing, grading, and building and infrastructure construction) is conservatively estimated to be 194.6 tons (primarily comprised of mixed debris and trash). Approximately ~~1,250.8~~1,056.2 tons of construction waste (or approximately 84.5 percent of total waste generated over a period of 20 years) would be diverted using source separation and processing of mixed construction debris. These estimates are

based on the gross square footage of the proposed structures for each project identified in the Master Plan Update (see Table 3-1 for structure sizes).

Occupancy Waste Management

Implementation of the Project is estimated to generate approximately 1,488.1 tons of solid waste annually upon buildout, based on the assignable square footage (ASF) of the projects identified in the Master Plan Update (refer to Table 3-1 for details). Details of estimated annual solid waste generation and diversion rates by project site are provided in Table 7 of the WMP, included as Appendix K.

The campus already implements the requirements of the City's Storage Ordinance (SDMC Section 142.0801 et. seq.) as part of its existing operations, providing separate bins for recyclable waste products to be separated from non-recyclable solid waste. For the new facilities constructed under the Master Plan Update, education programs would continue to be implemented to ensure the proper handling of waste.

Over the next 20 years, existing campus solid waste disposal would increase by approximately 892.8 additional tons annually as non-recyclable/non-reusable waste at Miramar Landfill, and approximately 595.2 additional tons are estimated to be diverted as clean, recyclable materials, gathered in on-site recycling bins. These estimates are based on the City's current waste generation factors, which do not take into consideration the additional sustainability measures and recycling programs that are conducted on the campus that go above and beyond the overall 40 percent diversion estimated by the City for occupancy. It is estimated that the current diversion rate on campus is approximately 45 percent with the implementation of additional recycling and sustainability programs, such as green waste chipping; composting and campus food digestion system; and recycling of cardboard, electronic waste, etc. (HELIX 2016b). Additionally, where a mix of uses is proposed, the most conservative waste generation factor was used since the anticipated mix of square feet for each use (e.g., administrative, student housing, parking, etc.) is not currently known. Based on these considerations, the actual waste generation would likely be lower than the estimated waste generation rates.

The Master Plan Update would construct approximately 471,738 ASF of building space, which represents the occupied and/or "useable" portions of the buildings. Currently, the existing campus generates approximately 1,569 tons of waste and diverts approximately 703.8 tons, according to data provided by Waste Management (2016). This represents an overall waste generation rate of 1.32 pounds of disposed waste per square foot and 0.59 pound of diverted waste per square foot per year for the existing campus. The Project is calculated to generate 3.78 pounds of disposed waste per square foot and 2.52 pounds of diverted waste per square foot per year. This increase from the estimated waste generation for the existing uses is due to the conservative nature of the waste generation rates used in the WMP; however, for reasons noted above, including the incorporation of additional sustainability measures and recycling programs (see below), it is anticipated that the actual waste generated during operation of the projects would be less than calculated. Moreover, the project sites identified in the Master Plan Update would be built out over a period of 20 years, during which time more stringent waste regulations are already anticipated (e.g., composting requirements) or are likely to be applied to further reduce waste generation.

As stated in Chapter 7, Sustainability, of the Master Plan Update, all new buildings and additions on campus would be required to meet minimum energy saving and sustainable design standards of USGBC LEED Silver (or equivalent) during the occupancy phase. The Master Plan Update campus improvements would incorporate the following sustainable and waste reduction elements consistent with LEED principles, to be verified as part of the SCR process for each individual project. All future projects would be required to comply with LEED standards and other local and state regulations including any amendments imposing more stringent requirements.

- Thoughtful planting design is key to reducing maintenance needs (e.g., setbacks from hardscape, allowing plants to grow naturally without need to over prune), and keeping replacement planting ~~costs~~ costs low.
- Maintain a campus recycling program to provide a dedicated area for the collection and sorting of recyclable materials.
- Coordinate the recycling program efforts with local hauling companies and campus construction projects to maximize the program's effectiveness dealing with daily waste collection.
- Continue to provide recycling bins throughout the campus as part of a landfill diversion program.
- Incorporate multi-stream containers to collect food waste and provide a composting option throughout dining areas on campus, pursuant to AB 1826.

Significance of Impact

A WMP was prepared and approved by the City's ESD for the Project. Implementation of the approved WMP would be made a condition of the CUP approval for the Master Plan Update. With implementation of the WMP and compliance with local and state regulations, direct impacts to solid waste management during construction and demolition of the project, and operation of the University would be less than significant.

Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

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5.8 Visual Effects and Neighborhood Character

This section assesses modifications to the baseline conditions that have occurred since the certification of the previous 1996 Master Plan FEIR with regard to visual effects and neighborhood character. This section also addresses whether changes to the Master Plan would have the potential to have an adverse effect on such resources.

5.8.1 Existing Conditions

Visual Setting and Site Characteristics

The University occupies approximately 180 acres of land devoted to university-related uses in the central portion of the City within the community of Linda Vista. The campus is situated on a highly visible mesa top, with Morena Boulevard to the west, Via Las Cumbres bordering the campus to the east, Linda Vista Road bordering the campus to the south, and Tecolote Canyon Natural Park to the north. Surrounding land uses include residential and industrial/commercial development to the west in the Morena Boulevard area, student and non-student multi-family housing to the south, and residential development to the east.

Topography on site ranges from approximately 50 feet above mean sea level (AMSL) in the western portion of the campus to approximately 260 feet AMSL in the eastern portion. Existing steep slopes within the campus are depicted in Figure 5.8-1, *Steep Slopes*. A total of approximately 705,000 square feet (16.2 acres) of steep slopes occur within the 180-acre Master Plan Update boundary. Slopes on campus include the slope just north of the west entrance of the University at Marian Way, the north-facing slope on the southern rim of Tecolote Canyon, the north-facing slope adjacent to the existing Sports Complex, and the south-facing slope north of Linda Vista Road.

The majority of the University is developed and supports campus facilities (academic buildings, sports facilities, parking lots, etc.) and ornamental landscaping. The existing buildings are 16th century Spanish Renaissance style, light in color, and exhibit ornate detailing on entrances and roof lines. Natural vegetation, including Diegan coastal sage scrub, maritime succulent scrub, southern willow scrub, southern mixed chaparral, and non-native grassland, comprises approximately 21 acres of the 180-acre campus. These undeveloped areas are primarily located on the slopes adjacent to Linda Vista Road, Marian Way, and Tecolote Canyon. Photographs were taken to illustrate the character of the University and the various land uses in the area. The locations of the photographs and viewpoints on and surrounding the campus are identified in Figure 5.8-2, *Key Photograph Locations*. Figures 5.8-3a-b, *Key Photographs*, contain photographs taken of the campus at locations depicted in Figure 5.8-2 (i.e., L1 through L4). Figures 5.8-4a-c, *Key Public Viewpoints*, provide photos of key views from public locations near the campus at locations depicted in Figure 5.8-2 (i.e., V1 through V5).

Community and Neighborhood Character

Linda Vista

The Linda Vista community is primarily residential, with other land uses consisting of light industrial and commercial in the Morena Boulevard area, retail uses in central Linda Vista, and the institutional

uses of USD. Housing types include single-family homes on small lots, duplexes, triplexes, and small apartment buildings. Larger apartment complexes have been developed recently, such as the Carmel Pacific Ridge Apartments located across from the campus on Linda Vista Road. In addition to USD, there are several schools for grades kindergarten through 12th grade, including public, private, and charter schools.

While much of the community is on a mesa, parts of Linda Vista are topographically low along the southern border with Mission Valley and in the Morena area at the western end of the community. Steep hillsides exist along Tecolote Canyon at the community's western edge, along finger canyons extending northward from Mission Valley, and along the edges of the USD campus. Natural open space areas are primarily within these canyons. The largest open space area within the community is Tecolote Canyon Natural Park, which has been classified as a resource-based park because it contains distinctive natural features and serves the entire City. The park provides an opportunity for visitors to experience a relatively natural environment within an urban setting. Natural vegetation includes oaks, sycamores, willows, and coastal sage scrub along the slopes.

With the exception of the Carmel Pacific Ridge condominium complex, constructed in 2013, the majority of the buildings within the vicinity of the University are one- to two-story structures. The surrounding uses, which include single- and multi-family residences and commercial/industrial uses, are generally smaller in bulk and scale than the University structures within the main campus. The Carmel Pacific Ridge condominium complex, located directly across from USD on Linda Vista Road, consist of a large-scale, 553-unit complex comprised of eight four-story buildings with subterranean parking. The development occupies almost 1,000 feet of frontage on Linda Vista Road and is visually prominent along the roadway due to its bulk and scale compared to surrounding adjacent homes to the west.

University of San Diego

USD has been a landmark of the Linda Vista community since its construction in the 1950s. The campus is located on a mesa, with views from the campus toward Tecolote Canyon, Mission Bay, Old Town San Diego, and other parts of San Diego. The campus, itself, also contributes to iconic views within the community due to its elevated location above its surroundings. The buildings on campus are designed and built in a distinct Spanish Renaissance architectural theme with plazas, gardens, courtyards, arcades and the Marian Way Mall and Colachis Plaza, as specified in the 1996 Master Plan. Landmark buildings, such as the Church of the Immaculata, as well as the Joan B. Kroc Institute for Peace and Justice and Shiley Center for Science and Technology, which were constructed in 2001 and 2003, respectively, as part of the 1996 Master Plan, contribute to the character of the Linda Vista community and to the city's skyline.

Academic uses are generally concentrated on the west end of campus, with professional programs arranged in a line of buildings that stretches across the south side of Marian Way and Colachis Plaza and almost to the Marian Way entrance of campus. The eastern end of campus is predominantly used for residential and athletic purposes. A defining element of the campus is the campus pedestrian mall, located along Marian Way. The central portion was closed to cars and reconfigured as Colachis Plaza in 2005. USD does not have a large central "quad" or large open green space for gathering or informal recreation with the exception of Colachis Plaza and Plaza de San Diego. Many buildings contain interior courtyards, providing a unique continuity of indoor and outdoor spaces

and enhancing both built and natural spaces. In contrast to the highly manicured landscaping of the campus, the surrounding landscape is natural and rugged, particularly around Tecolote Canyon.

Existing building heights on campus range from one to five stories. Many buildings are stepped/terraced to conform to the topography of the mesa and canyon areas of campus and take advantage of existing slopes to reduce the scale of the buildings. Athletic and recreational facilities provide open space relief from developed areas of the campus. Small surface parking and landscaped areas break up the mass and scale of the larger buildings within the main campus. Two large-scale parking structures are located at the west end of campus and east of the Alcalá Parkway entrance to the campus, in addition to the subterranean parking below the Joan B. Kroc Institute for Peace and Justice.

Existing Landforms

The University is sited on a mesa, with steep slopes present within the western portion of the campus and leading to the Tecolote Canyon Natural Park, north of campus. The campus is generally separated topographically into two areas: the main portion of campus and the eastern portion of campus. Areas west of the Marian Way entrance to the campus are relatively flat. In the vicinity of the west campus area, Linda Vista Road and adjacent off-site residential development is as much as 95 feet below the elevation of the existing University structures. In many areas, only the upper stories of structures and buildings located along the edge of steep slopes (such as the Shiley Center for Science and Technology building located near the western entrance to the campus) are visible from Linda Vista Road. The eastern portion of campus, generally located east of the Alcalá Parkway entrance, ranges more in elevation and drops down in elevation from the Linda Vista Road corridor.

Views

Designated Views

The Linda Vista Community Plan designates Tecolote Canyon as a public vantage point. As indicated in the Community Plan, public views from Tecolote Canyon should be protected. No other designated viewpoints, view corridors, scenic routes, or scenic vistas occur in the vicinity of the campus.

Public Views

Public views of the campus are available from portions of public roadways in the immediate vicinity, including Linda Vista Road. Longer range views are also afforded of the campus from regional freeways that traverse through central San Diego. The campus is partially visible from the eastern portion of Mission Bay Park due to its elevation and prominent buildings. The distinct architecture and building forms that are highly visible draw the eye of viewers traveling along most local roadways and freeways where a view exists.

Existing trees, topography, and development along these roadways partially obstruct views of the campus from these vantage points, but open views are available intermittently between vegetation and development. Public views also are available from Tecolote Canyon Natural Park to the north of the campus and Edward Tyler Cramer Park located south of and across from the campus along

Linda Vista Road (refer to Figure 2-2 which shows the proximity of the campus to surrounding public vantage points).

Tecolote Canyon

Viewpoint 1 (V1) in Figure 5.8-4a depicts the southeastern view from the Tecolote Canyon Natural Park trail, looking toward the Valley residential areas on the east site of campus. The existing Mission Housing Complex is visible from the trail, although obscured by vegetation throughout much of the western portions of the trail.

Viewpoint 2 (V2) in Figure 5.8-4a represents a view looking southwest from the Tecolote Canyon Natural Park trail, from which University buildings located along the top of the ridgeline can be seen. The existing University structures on the north side of the campus are visible from approximately the southern mile of Tecolote Canyon. From the canyon bottom, which is at an elevation of approximately 60 feet AMSL adjacent to the University, park users currently have to look south and up (a difference in elevation of approximately 140 feet) the canyon slopes to view existing campus facilities. These buildings do not dominate views or detract from the natural beauty of the canyon.

Linda Vista Road

Viewpoint 3 (V3) in Figure 5.8-4b shows the view looking northeast at the west campus from the intersection of Napa Street and Linda Vista Road. The upper portions of other existing campus structures located along the southern ridgeline of the University are visible to drivers, bicyclists, and pedestrians using Linda Vista Road. From this public vantage point, the Shiley Center for Science and Technology and Joan B. Kroc Institute for Peace and Justice are the primary University buildings that are visible, in addition to the natural slopes and vegetation adjacent to Marian way and Linda Vista Road. The upper portions of other campus structures are visible further in the distance. Further east of the Napa Street/Linda Vista Road intersection viewpoint, campus buildings are more clearly visible, including the existing Presidio Terrace Apartments (as seen in Viewpoint 2 shown in Figure 5.8-4b and described in further detail below). This area of campus represents a visual landmark in the community, as the existing buildings are prominent features on the mesatop constructed as part of the 1996 Master Plan.

Viewpoint 4 (V4) in Figure 5.8-4b shows the view looking west traveling westbound on Linda Vista Road. As depicted, the majority of public views looking west from Linda Vista Road are screened by existing landscaping and topography. While the Pacific Ocean can be seen by westbound drivers on Linda Vista Road on clear days, the existing campus housing buildings located along Linda Vista Road blend in with existing residential development on the southern side of the roadway and do not obstruct views.

Edward Tyler Cramer Park

Public views of the campus are available from Edward Tyler Cramer Park, a public park operated by the City that is located across from the Alcalá Parkway entrance to the campus on Linda Vista Road. Viewpoint 5 (V5) in Figure 5.8-4c depicts a view looking northwest from the northern portion of the park. Campus buildings such as the Degheri Alumni Center, Student Life Pavilion, Jenny Craig Pavilion, Alcalá Vista Apartments, and the Mission Parking Structure, are visible from the northern

portions of the park. From further south within the park, views of some of these buildings are obstructed by the adjacent four-story Carmel Pacific Ridge apartment complex.

Applicable Guidelines and Regulations

Section 5.1, *Land Use*, provides a complete analysis of the consistency of the Project with the City General Plan and the Linda Vista Community Plan. Summarized below are some of the more significant adopted policies related to visual quality and neighborhood character.

City of San Diego General Plan

The Urban Design Element of the General Plan contains the goals, recommendations, and urban design objectives that relate to visual issues and community and neighborhood character. The stated purpose of the Urban Design Element is to guide physical development toward a desired scale and character that is consistent with the social, economic, and aesthetic values of the City (City 2008a). The Urban Design Element defines community and neighborhood character as the visual and sensory relationship between people and the built and natural environment. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework.

The Urban Design Element identifies several goals and policies to help guide compact, efficient, and environmentally sensitive patterns of development. As the availability of vacant land becomes more limited, designing infill development which complements our existing communities becomes increasingly important. The Urban Design Element identifies the following goals and policies applicable to the Project as it relates to visual effects and neighborhood character:

A. General Urban Design Goals

- A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and respects desirable community character and context.

Policies

Architecture

UD-A.5 Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.

UD-A.6 Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

Landscape

UD-A.8 Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

Structured Parking

- UD-A.11 Encourage the use of underground or aboveground parking structures, rather than surface parking lots, to reduce land area devoted to parking.

Surface Parking

- UD-A.12 Reduce the amount and visual impact of surface parking lots.

Signs

- UD-A.14 Design project signage to effectively utilize sign area and complement the character of the structure and setting.

Project consistency with applicable General Plan policies is described in detail in Section 5.1, *Land Use*.

Linda Vista Community Plan

The University is described in the Community Facilities Element of the Linda Vista Community Plan. Relevant policies and specific proposals from the community plan that relate to visual resources and community character include the following:

Policies

2. The University, the Linda Vista Community Planning Committee, and the City should continue to work together to ensure that the growth, development, and operation of the University are compatible with the surrounding neighborhoods and the City as a whole.

Specific Proposals

3. The University should maintain the existing 16th Century Spanish Renaissance theme in its new construction and rehabilitation of existing buildings.
4. Development on the campus should not encroach into designated open space and should respect and maintain scenic hillsides and sensitive vegetation.

Consistency with applicable Community Plan policies is described in further detail in Section 5.1.

Land Development Code

The City's LDC contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights; maximum lot coverage; floor area ratios; and front, rear, and side yard setbacks, the LDC provides restrictions on land development and design that affect visual quality.

ESL Regulations and Steep Hillside Regulations

The LDC contains development restrictions and guidelines to protect and enhance ESLs. The steep hillsides within the Master Plan area are subject to the provisions of the ESL Regulations and steep hillside guidelines of the LDC (Section 143.0101 et seq.). Steep hillsides are defined as those with

natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet.

Grading Regulations

The LDC (Section 142.0101 et seq.) contains grading regulations to address landform preservation and requires that all grading to be designed and performed in conformance with applicable City Council policies and the standards established in the Land Development Manual (including the ESL Regulations).

5.8.2 Impact

Issue 1: Would the proposal result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Impact Thresholds

The City's Significance Determination Thresholds (2011) regarding visual impact criteria establishes thresholds for potential impacts to public views from designated open space areas, roads or parks, and for project impacts to visual landmarks or scenic vistas. In order for a project to result in a significant impact, one or more of the following conditions must apply:

- The project would substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program;
- The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan;
- The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area; and/or
- The project would have a cumulative effect by opening up a new area for development, which will ultimately cause "extensive" view blockage.

Impact Analysis

Previously Disclosed Scenic Vista and Public View Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR identified the potential for significant impacts to scenic vistas and public views of the campus related to future project sites and design elements identified in the Master Plan. Key public views of the University campus were described from Tecolote Canyon Natural Park to the north, I-5 and Mission Bay to the west, and Linda Vista Road to the south and southwest. The project was re-configured to reduce visual effects on the natural character of Tecolote Canyon to less than significant. Views from I-5 and Mission Bay toward the campus were determined not to be adversely affected by implementation of the Master Plan, due to the height and scale of proposed projects being similar or reduced compared to existing structures (e.g., the Immaculata Church), use of landscaping to blend disturbed areas with surrounding vegetation, and because the landform alterations would not be perceptible from that far away. Impacts to views from Linda Vista Road

resulting from implementation of new projects were determined to be less than significant, because the new structures would be similar in character and appearance to existing surrounding on- and off-campus buildings. Further, landscape screening would be utilized. Mitigation Measure IV.C-1 required the preparation of a Master Landscape Plan and Design Guidelines to address landscaping throughout the campus.

Impacts from Master Plan Update

The following discussion focuses on the potential impacts to public views associated with revisions to the Master Plan, as described in Section 3.0, *Project Description*, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Key Public Views

One new key public viewpoint at V5, Edward Tyler Cramer Park located across from the Alcalá Parkway entrance to the campus on Linda Vista Road, has been added since preparation of the 1996 Master Plan FEIR. Potential impacts to public views from this park are assessed below, in addition to views from the other locations identified in the 1996 Master Plan FEIR with the exception of I-5 and Mission Bay. None of the proposed project sites would be visible from I-5 and Mission Bay due to the distance of the campus from these locations (over 0.5 mile), as well as the locations/elevations at which projects would be sited and the overall size of these projects. Projects in the western portion of campus have a higher potential to be visible from the I-5/Mission Bay vantage point than those proposed in the southern and eastern portions of the campus. In addition, projects on the mesa-portion of campus would also have a higher potential to affect views from the west. Specifically, the trails/landscape enhancements and plaza/mall/bridge of Project Site Nos. 17 and 19 would not be visible due to their low elevation relative to the mesa combined with the distance from which they would be viewed. Project Site No. 18, which proposes a five-story parking structure (three stories above grade) and administrative use, would be located adjacent to and lower in elevation than the existing West Campus parking structure, and blocked from view by existing buildings in the Moreno Boulevard area to the west. Based on these considerations, no impacts to views of the campus from I-5 and Mission Bay would occur and no further discussion is warranted.

Tecolote Canyon

Existing University structures along the northern edge of campus (refer to Figure 5.8-4a, Viewpoint 1) and within the eastern portion of the Valley residential and athletics area (refer to Figure 5.8-4a, Viewpoint 2) are visible from Tecolote Canyon. There are three projects that are proposed along the northern ridgeline above the canyon (i.e., Project Site Nos. 20, 21, and 24) that are discussed below.

Project Site No. 20 would upgrade the existing Facilities Management Complex with a two-story, 32,000 GSF structure. Improvements are anticipated to occur within existing building footprints at an elevation above the canyon floor and distance from the trails that would make it difficult to discern the changes on campus from within the canyon; therefore, no changes to scenic views would occur as a result of the Project.

Project Site No. 21 proposes a two-story, approximately 13,500-GSF academic/administrative/student services building to be located within an existing courtyard associated with Founder's Hall. The new building would be the same height and scale as Founder's Hall and other surrounding buildings, and would blend in with existing buildings, be partially obscured from view by intervening topography and setback from the edge of the canyon. Therefore, the new building would not be expected to result in a substantial visual change to viewers within Tecolote Canyon. No obstruction of scenic views would occur.

Project Site No. 24 proposes approximately 65,000-GSF of student housing, student services uses, and parking within a five-story building(s). The project site would be located between Maher Hall and the Hahn University Center, within an area currently developed with surface parking. As shown in Figure 5.8-4a, Viewpoint 1, the upper floors of Maher Hall (four stories above grade) and the Hahn University Center (two stories above grade) are visible from the canyon along the ridgeline (left-center). These buildings are not the most prominently viewed of University buildings along the ridgeline, compared to other taller buildings located closer to the ridge. Although the proposed Project Site No. 24 building(s) would be one story higher than Maher Hall, it would also not be as visible as other existing buildings to the west, and would be architecturally similar to existing buildings and set back from the canyon rim south of the internal loop road. Views toward the campus from Tecolote Canyon would not be obstructed or substantially changed as a result of this Project.

In addition to the project sites located along the northern edge of campus that would be visible from Tecolote Canyon, Project Site No. 27 would be approximately 85,710 GSF of student housing/student services uses. It would be visible along the northeastern edge of campus where the Mission Housing Complex is currently located. The existing Mission Housing buildings are three stories in height and set at a higher elevation than the canyon (Figure 5.8-4a, Viewpoint 2). Project Site No. 27 would replace the Mission Housing Complex with several three-story-high buildings that would be set back further from the canyon rim than the existing buildings, broken into a series of smaller structures and stepped back from the canyon edge (refer to the discussion under Issues 2 through 4 for additional discussion of the aesthetics of the new housing buildings). Thus, the new buildings would not result in substantial obstruction of existing public views within Tecolote Canyon.

Linda Vista Road

As described above, Figure 5.8-4b, Viewpoint 3 shows the view looking northeast at the western end of campus from the intersection of Napa Street and Linda Vista Road. From this public vantage point, only two project sites would be potentially visible: Project Site Nos. 17 and 19. Because the trails/landscape enhancements and plaza/mall/bridge of Project Site Nos. 17 and 19 would be relatively small in scale and occur on the lower elevations of campus, they would not represent significant changes in the existing easterly views of the campus along Linda Vista Road or block scenic public views. Project Site No. 18, the parking structure/administrative facility, would be blocked from view by existing buildings to the west and south, and would blend in with the existing parking structure and University buildings located within this area.

Similar to existing campus structures located along the southern ridgeline of the campus, Project Site Nos. 22, 23, and 26 would also be visible from Linda Vista Road, although partially obscured by existing and proposed vegetation and landscaping. None of the projects are anticipated to obstruct scenic views from Linda Vista Road as described below.

Project Site No. 22 proposes a four-story, approximately 175,000-GSF academic/administrative building, to be constructed south of the existing four-story Hughes Administration Center and stepped down with the topography. Project Site No. 26 proposes an approximately 69,500-GSF academic/administrative building within a three-story expansion of the existing three-story Loma Hall and Bookstore. Although these structures would deviate from the height limits in the residential zone by up to 35 feet (to a maximum of 65 feet in height), only the upper portions of the structures would be visible from Linda Vista Road. The structures would be constructed at similar elevations, stepped down with the topography, and feature the same building heights and setbacks from the road as the existing nearby campus buildings, which cannot be clearly seen by roadway users as they are partially blocked by existing trees. Construction of these projects would not represent a significant departure from existing views along the roadway because the new building(s) would blend in with existing campus buildings, and multi-family residential structures across from campus on the south side of Linda Vista Road, and would not block a view of an important resource (e.g., Pacific Ocean).

Project Site No. 23 would replace the existing Presidio Terrace Apartments with an approximately 148,240-GSF student housing building/parking structure. The building would be four stories in height, compared to the existing two-story apartment building, and would be stepped down or terraced with the topography. It is anticipated that the new building would be constructed within a similar footprint as the existing apartment building property. Although a height deviation would be required to exceed the height limits in the RS-1-7 residential zone (a change from a maximum of 24/30 feet to 55 feet in height), the building footprint would comply with the appropriate setback requirements from Linda Vista Road. Landscaping and street trees would be provided between Linda Vista Road and the project site to screen the buildings. The overall scale of the housing and parking structure would be similar to the existing student housing in the area, resulting in moderate changes to views compared to existing conditions, since scenic views of the Pacific Ocean are already blocked by existing buildings and intervening topography from this location.

Edward Tyler Cramer Park

As described above and depicted in Figure 5.8-4c, Viewpoint 5, the eastern end of campus is visible from Edward Tyler Cramer Park. Two future project sites are proposed within the vicinity of the park: Project Site Nos. 26 and 30. The one-story structure at Project Site No. 29 would be situated below grade of the park, behind existing structures and not visible from park users. Project Site No. 26 is anticipated to be obscured by the existing Degheri Alumni Center and campus landscaping and would not be viewed by users of the park. Project Site No. 30, which proposes new student housing, student services, parking, and athletic facilities, would be obscured from park users behind the existing Alcalá Vista Apartments and campus landscaping. Thus, implementation of the Master Plan would not obstruct views from Edward Tyler Cramer Park.

Significance of Impact

The Master Plan Update would not substantially alter or block public views from public viewing areas, including Linda Vista Road, Tecolote Canyon, and Edward Tyler Cramer Park because (1) the majority of public views from these locations are screened by existing landscaping and topography, (2) existing and proposed University buildings would blend in with existing development (e.g., existing residential development along Linda Vista Road, existing University buildings, etc.); and (3) project sites would be an extension of existing campus uses and would not be substantially more

visible than existing structures or be at a location or scale to obstruct existing scenic public views. Moreover, the Master Plan Update contains policies intended to protect views of open space areas, and implementation of each individual project would require conformance with these policies. Therefore, impacts related to view blockage would be less than significant.

Mitigation, Monitoring, and Reporting

Impacts would be less than significant; no mitigation is required.

5.8.3 Impact

Issue 2: Would the proposal result in the creation of a negative aesthetic site or project?

Issue 3: Would the proposal result in project bulk, scale, materials, or style which would be incompatible with surrounding development?

Issue 4: Would the proposal result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), in order for a project to result in a significant negative visual appearance, one or more of the following conditions must apply:

- The project would create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance);
- The project significantly conflicts with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment);
- The project includes crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public;
- The project is large and would result in an exceeding monotonous visual environment (e.g., a large subdivision in which all the units are virtually identical); and/or
- The project includes a shoreline protection device in a scenic, high public use area, unless the adjacent bluff areas are similarly protected.

In order for a project to result in a significant impact to neighborhood character, one or more of the following conditions must apply:

- Exceed the allowable height or bulk regulations and existing patterns of development in the vicinity by a significant margin;

- Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme;
- Result in the physical loss, isolation, or degradation of a community identification symbol or landmark (i.e., a stand of trees, coastal bluff, historic landmark), which is identified in the General Plan, applicable community plan or coastal program;
- Be located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projections; and/or
- Have a cumulative effect by opening up a new area for development or changing the overall character of the area (e.g., rural to urban, single-family to multi-family).

Impact Analysis

Previously Disclosed Visual Resources Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential for significant impacts to visual resources and neighborhood character within the Master Plan area. The 1996 FEIR noted that all of the Master Plan projects would be designed in similar architectural style, color, and exterior detail to existing structures and would be compatible with existing University facilities. No visual quality impacts were assessed relative to architecture. Preparation of Master Landscape Plan and Design Guidelines was required (Mitigation Measure IV.C-1) to guide development of future projects, which would be assessed for conformance during discretionary review.

Impacts from Master Plan Update

As described in Section 3.0, the Master Plan Update provides updated framework to guide the development of future project sites proposed within the campus over the next 20 years. The Master Plan Update builds upon the goals and objectives identified in the 1996 Master Plan. The Design Guidelines identified in Section 8 of the Master Plan Update provide direction on the physical development of the campus and support key planning principles and framework plans established in the Master Plan Update (refer to Appendix B). General Design Guidelines guide the quality of each project and would be evaluated during the SCR process for each project site to ensure compliance with the Master Plan Update. Focus Area Guidelines provide greater detail regarding site planning, building design, and spatial orientation, with specific guidelines that would establish design criteria at the beginning of each project design effort. General Design Guidelines that are relevant to visual character/quality, neighborhood character, and landform alteration are provided for the following topics:

- Grading;
- Architectural design, including architectural character and guidance for specific areas of campus;
- Architectural elements, such as building elevation and façade treatment, building heights, etc.;

- Landscape design, including landscape character and guidance for specific areas of campus;
- Landscape elements, such as hardscape, campus perimeter fencing, parking structures, etc.;
- Plant palette;
- Lighting;
- Signs; and
- Sustainability, including design intent, building design, landscape design, etc.

It should be noted that the Master Plan Update proposes deviations to the base residential zoning on campus, which alter the maximum allowed heights and floor area ratio commonly used for institutional uses. The campus is located within the OR-1-1, RS-1-7, RM-1-1, RM-3-7, CC-4-2, CC-4-5, and CC-5-4 zones of the City LDC (refer to Figure 2-4 in the *Environmental Setting* discussion). The following deviations are proposed as part of the Master Plan Update:

- A deviation to the RS-1-7 base zoning for height from 24/30 feet to the heights specified in in Table 3-1.
- A deviation to the RS-1-7 base zoning for Floor Area Ratio from 0.45 to 0.60 across the entire campus.
- A deviation to the RM-1-1 base zoning for height from 30 feet to the heights specified in Table 3-1.
- A deviation to the RM-3-7 base zoning for Height from 40 feet required to the heights specified in Table 3-1.

Bulk and Scale

The bulk and scale of future projects proposed in the Master Plan Update would contribute to visual changes within the campus and surrounding areas. New buildings would range in height from one story with a maximum height of 15 feet (Project Site No. 29, athletics/ administrative building located within the Valley athletics area) to four stories with a maximum height of 65 feet (Project Site No. 22, academic/administrative building that would step down with grade). When siting new facilities, the Project would give consideration to how the scale and density of new buildings relate to existing campus development (Appendix B).

Building designs would take advantage of existing slopes and topography to reduce the overall massing and scale, where possible. Where buildings and parking structures are proposed to be located within sloped areas with natural terrain, they would be stepped or terraced to integrate into the hillsides. Large trees would be incorporated within landscaping near buildings to soften architectural lines and building mass. The mass and scale of parking structures would be reduced through use of varying architectural features and appropriate landscaping.

For the projects that would be visible from Linda Vista Road (Project Site Nos. 22, 23, and 26) and Via Las Cumbres (Project Site No. 30), the bulk and scale of proposed structures would be similar to existing buildings located along the southern edge of campus. New buildings would not substantially contrast with surrounding development. Project Site No. 23, the student housing/parking structure

project, would be the closest to and most visible from Linda Vista Road, and would be four stories high with only one to two stories visible from the roadway. Building massing and visual prominence would be reduced through the use of stepping/terracing within the slope (Figures 5.8-5a and 5.8-5b, *Conceptual Building Cross-Sections*).

As described in Section 5.8.2, above, four projects (Project Sites Nos. 20, 21, 24, 27 and 28) would be located adjacent to and/or potentially visible from public open space within the Tecolote Canyon Natural Park. These projects would not contrast with surrounding development, since they would be similar in bulk and scale to existing structures located immediately adjacent to the proposed buildings. Additionally, Project Site No. 27 would be set further back from the canyon than the existing student housing structure within a smaller building footprint, using proportional building heights (maximum three stories, or 40 feet in height), and oriented such that the narrow ends of the new buildings would face toward the canyon to further reduce the visual effects related to bulk and scale (Figure 5.8-5). Pedestrian open space connections would be provided within student housing areas adjacent to the canyon edge in the Valley. Breaks in the façades would be provided to reduce the visual bulk and scale of buildings along the canyon edge. Buildings would be terraced to further soften impacts along the canyon edges and maintain low profiles to reduce visual prominence from the canyon floor.

Architectural Styles

As described in the Master Plan Update Design Guidelines, projects would be designed in similar architectural style, color, and exterior detail to existing structures. Each of the structures would be compatible with existing University facilities and maintain the Spanish Renaissance and Mission architectural styles exhibited by existing buildings. Section 8.4, Architectural Design, of the Master Plan Update provides architectural design guidelines for future development within the four areas of campus that have distinct architectural character: Campus Core/academic areas; Valley residential areas, wellness and recreation facilities; East Campus residential areas, collegiate athletics and recreation facilities; and Alcalá Park West. Section 8.5, Architectural Elements, of the Master Plan Update provides guidance for the use of various architectural elements, such as building orientation and façade treatment, building base and heights, etc., to provide architectural interest for new development within the campus. These guidelines would be referenced in the design of future campus projects and project compliance would ensure compatibility with the existing architectural character of the campus. Because future project sites would be consistent with the existing campus visual character, they would also be consistent with the surrounding environment.

Community Landmarks

The USD campus, and more specifically the Church of the Immaculata, is considered a landmark of the Linda Vista community and City, and sits within a prominent mesa top location adjacent to Tecolote Canyon. Due to its ownership by the Catholic Diocese, the Church of the Immaculata is not a part of the Master Plan Update and no changes to the facility are proposed. In general, implementation of future campus construction and the emerging campus landscape would continue to maintain the existing campus character that has been established within the University. In addition, the siting of future facilities and massing of project sites would take into consideration the campus' desire to maintain views of iconic landmarks, such as the Church of the Immaculata, from locations on and off-campus. No changes to community landmarks would occur under the Project.

Other Aesthetic Effects

As described in the Master Plan Update, open space and landscape play a large role in defining the character and visual quality of the campus. Goals of the Master Plan Update relative to open space areas and landscaping include providing unifying themes throughout the campus; use of a consistent plant palette; contributing an attractive, well-maintained campus perimeter landscape to the Linda Vista community; and providing compatible landscaping adjacent to Tecolote Canyon and sensitive native plant areas within and adjacent to the campus. A Landscape Master Plan, provided in Section 4.5 of the Master Plan Update, and landscape design guidelines described in Section 8.6 of the Master Plan Update, identify existing and proposed landscape uses within the campus, which are categorized into five types: streetscape areas, Campus Core/academic areas, residential areas, athletic fields and recreation areas, and undeveloped/transitional areas (refer to Appendix B). These sections of the Master Plan Update provide guidance and strategies for implementing future landscaping improvements. All future construction would be required to adhere to the Framework Plans and Landscape Master Plan Strategies.

Other features that contribute to the overall character of the campus and community include signage and lighting. Signage would be designed to be simple and compatible with the existing campus aesthetic. Outdoor lighting would be subject to the lighting guidelines provided in Section 8.11 of the Master Plan Update Design Guidelines. In addition, each future project site would be required to comply with the City's Outdoor Lighting Regulations that would mandate directional lighting to prevent potential for light and glare overspill on neighboring properties. The materials utilized for construction of structures would limit the amount of glare that may reflect from the proposed structures. Changes in campus signage, lighting, and glare would not be anticipated to create negative aesthetic effects or alter the existing character of the campus and surrounding area.

Significance of Impact

Implementation of the Master Plan Update would be compatible with surrounding development and not create a negative aesthetic effect. Further, the Master Plan Update would not cause substantial alteration to existing/planned character of the area because (1) the size, scale, architectural style, color, and exterior details of new buildings and facilities are required to be consistent with existing campus development and comply with applicable City regulations; and (2) buildings would be designed to take advantage of existing slopes and topography, and provide breaks in façades to reduce the overall massing and scale. The University would continue to serve as a community landmark within Linda Vista. Therefore, impacts would be less than significant.

Mitigation, Monitoring, and Reporting

No mitigation would be required.

5.8.4 Impact

Issue 5: Would the proposal result in a substantial change in the existing landform?

Impact Thresholds

According to the City's Significance Determination Thresholds (2011), in order for a project to significantly alter the natural landform, the following conditions must apply:

- The project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, in addition to one or more of the following conditions:
 - The project would disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1);
 - The project would create manufactured slopes higher than ten feet or steeper than 2:1 (50 percent);
 - The project would result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103 from existing grade to proposed grade of more than 5 feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site; and/or
 - The project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

The above conditions may not be considered significant if one or more of the following apply:

- The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms;
- The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations; and/or
- The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

Impact Analysis

Previously Disclosed Landform Alteration Impacts from 1996 Master Plan FEIR

The 1996 Master Plan FEIR assessed potential for significant impacts to landform alteration within the Master Plan area. Significant visual quality and landform impacts were identified for several

projects that proposed manufactured slopes in excess of 10 feet in height, including the Lower Olin Parking Lot, the Academic & Office Building/Southwest Parking Garage, East Campus Road, and the Canyon Fill projects. Mitigation Measure IV.C-2 was identified to provide grading requirements to reduce impacts associated with landform alteration. Detailed grading plans were required to be submitted for each project proposing grading to ensure compliance with applicable grading policies. Implementation of Mitigation Measures IV.C-1 and IV.C-2 were determined to reduce potentially significant impacts to less than significant.

Impacts from the Master Plan Update

The following discussion focuses on the potential landform alteration impacts associated with revisions to the Master Plan, as described in Section 3.0, that could result in new potentially significant impacts or a substantial increase in the severity of the previously identified significant impacts.

Landform Alteration

In order to optimize available land within campus, some future project sites are expected to be graded to create subterranean floors and would require landform alterations. ~~To the extent practicable, development proposed by the Master Plan Update would not encroach into designated open space, in accordance with the covenant of easement (COE) that would be recorded on the property,~~ and would respect scenic hillsides and sensitive vegetation on campus. Steep slopes and sensitive habitat areas around the perimeter of the mesa would be retained as important resources. Steep hillsides exist along the north portion of campus, adjacent to Tecolote Canyon, and are predominant in the western portion of campus. The majority of the project sites would occur within areas that are either currently developed or are not considered steep slopes or ESL. Trails such as those proposed in Project Site No. 17 would be designed to fit within the existing slopes and sited to minimize grading and impacts to existing landforms. While some construction sites (Project Site Nos. 19, 27, and 30) could potentially encroach into steep slope areas where landscape and/or hardscape improvements are proposed, no grading in excess of 2,000 cubic yards or construction of buildings are proposed within areas designated as steep slopes.

Project Site No. 22 is proposed within an area that qualifies as steep slope on the southern edge of campus next to the Shiley Center for Science and Technology. This is the only future project proposed to construct structures within steep slopes/ESL. Approximately 18,000 square feet of the 50,000-square foot academic/administrative building footprint would be located within steep slope areas, of which a total of 705,000 square feet occur on campus. No grading plans have been prepared for the Master Plan Update future projects; accordingly, the amount and severity of grading for future projects cannot be quantified at this time. Grading plans would be prepared for each individual project site during final project design at which time the details on grading quantity, and the location and extent of manufactured slopes would be determined. Despite the potential steep slope encroachment associated with Project 22, implementation of all 14 project sites identified in the Master Plan Update would not substantially change the existing landform of the campus.

Future construction implemented under the Master Plan Update would be reviewed to determine compliance with landform grading guidelines contained in the City's Grading Regulations, ESL Regulations, and Steep Hillside Guidelines of the LDC. In addition, the Master Plan Update identifies

the following General Design Guidelines related to hillside development that would apply to all project sites requiring grading of natural landforms:

- Minimize landform alteration to the extent possible and feasible.
- Utilize grading techniques that minimize the area of land alteration and disturbance.
- Optimize cut and fill operations within campus.
- Step development down the slope, working with the terrain and topography.
- Manufactured slopes should be contoured to a natural appearance to avoid obvious hillside cuts. All manufactured slopes will be revegetated.
- Minimize grading on the northern property line adjacent to Tecolote Canyon.
- Slopes adjacent to any native habitat should be planted with site and climate appropriate plant species and adhere to best practice for brush management and erosion control.
- Minimize the use of retaining walls. Where retaining walls are needed, integrate the color with natural, earth coloring as close as possible and consider GeoGrid or Keystone walls. Incorporate landscaping, as necessary, to soften the visual impact of retaining walls.

These project design features would minimize potential landform alteration effects from future construction.

Significance of Impact

Implementation of the Master Plan Update would primarily occur on the mesa and not affect steep slopes or natural landforms. Impacts to steep slopes protected by ESL Regulations and the creation of manufactured slopes in excess of 10 feet in height associated with future project sites would be considered potentially significant. Conformance with guidelines relating to grading, slopes and hillsides found in the Master Plan Update's General Design Guidelines, as well as applicable regulatory guidelines (e.g., ESL Regulations) would reduce most impacts to landform alteration to less than significant levels. However, without specific grading plans available, the analysis cannot demonstrate with certainty that all construction would achieve the City's standards outlined in the City's Significance Determination Thresholds. Therefore, potentially significant impacts to steep slopes are identified.

Mitigation, Monitoring, and Reporting

The following mitigation measure should be implemented for each Master Plan Update project site that would require grading on steep slopes, in order to avoid or reduce potentially significant impacts related to landform alteration and steep slopes to below a level of significance.

Vis-1 Prior to issuance of a grading permit for construction proposed to encroach into steep slopes (i.e., Project Site No. 22), a detailed grading plan shall be submitted to the City's Development Services Department and shall demonstrate to the satisfaction of the City Engineer substantial conformance with all grading policies in place at the time of project

application. Special design requirements for slopes that are to be graded shall be clearly indicated on the grading plan. At a minimum, proposed manufactured slopes shall imitate, to the extent feasible, the existing landform features through the use of: (1) contour grading and terracing to avoid extreme slope faces; (2) undulation to avoid straight slope faces; (3) rounding the tops and toes of slopes to simulate natural contours; and (4) slopes that do not exceed a grade of 2:1. Grading plans shall be reviewed by the City to ensure that sensitive grading techniques are being utilized.

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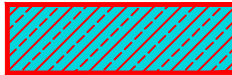
LEGEND



EXISTING SLOPES < 25%



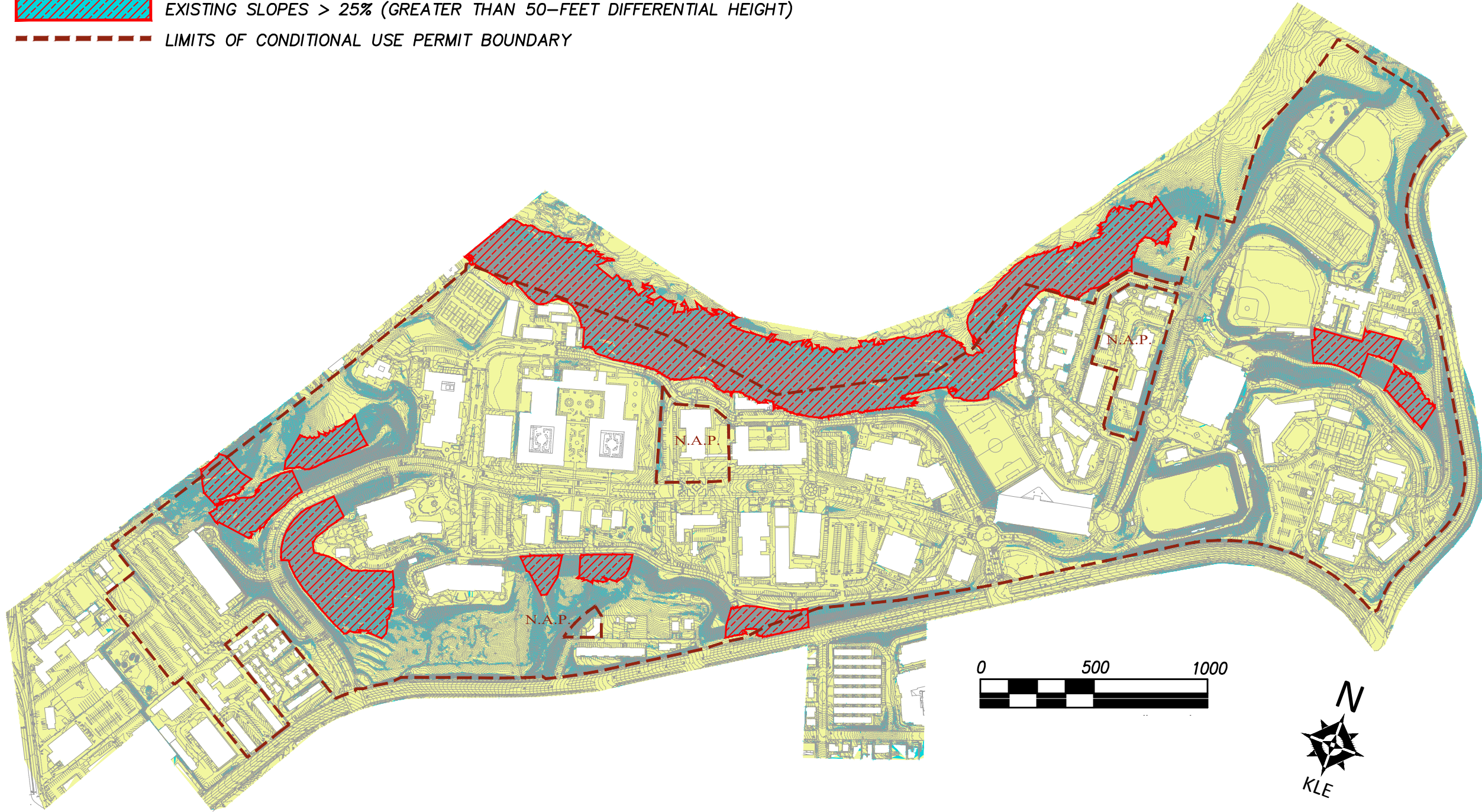
EXISTING SLOPES > 25% (LESS THAN 50- FEET DIFFERENTIAL HEIGHT)



EXISTING "STEEP SLOPES" PER SDMC 113.0103 AND STEEP HILLSIDE GUIDELINES
EXISTING SLOPES > 25% (GREATER THAN 50- FEET DIFFERENTIAL HEIGHT)



LIMITS OF CONDITIONAL USE PERMIT BOUNDARY



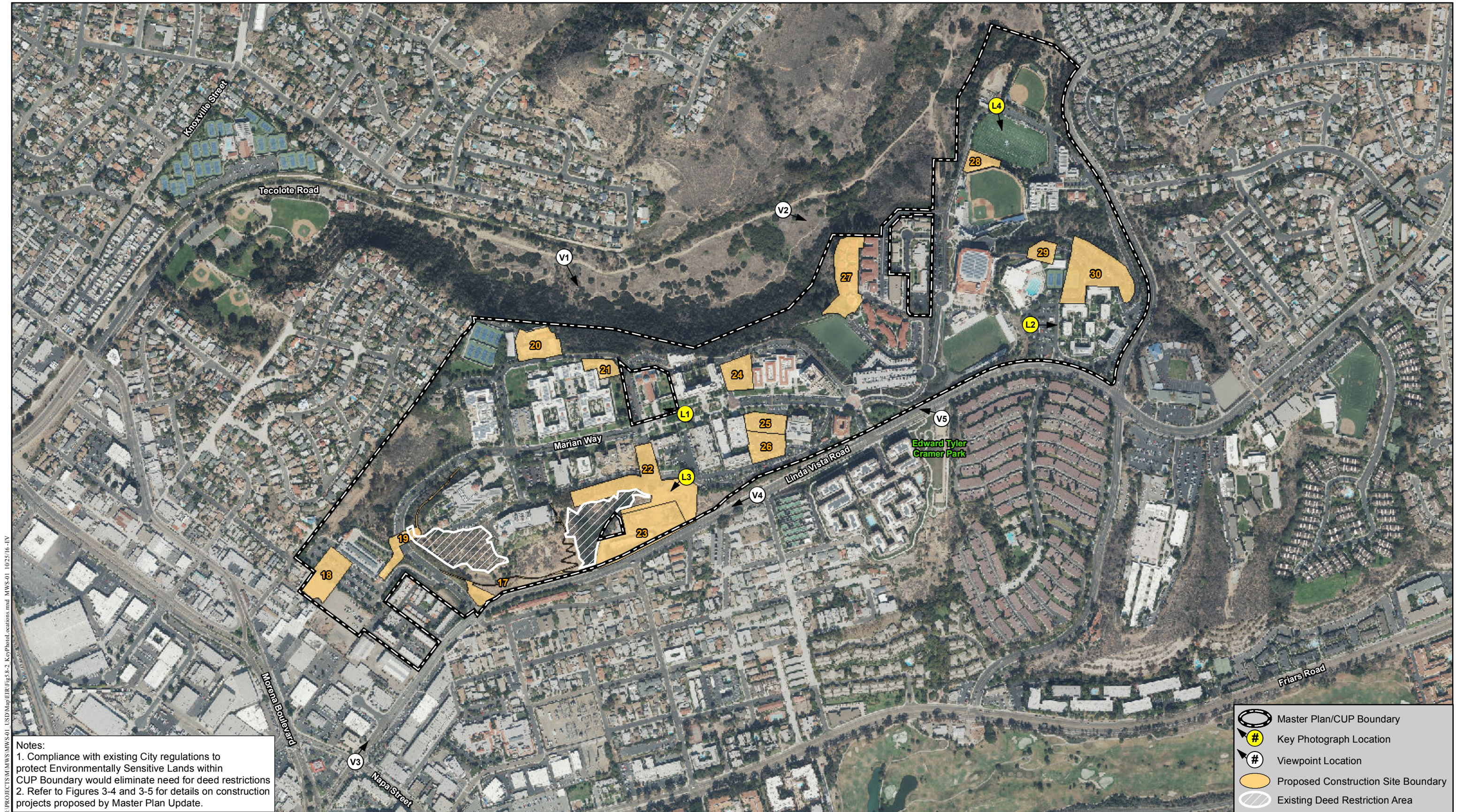
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Source: Kettler & Leweck 2016

Steep Slopes

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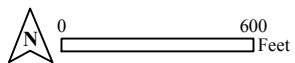
Figure 5.8-1



Key Photograph Locations

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.8-2





Location 1. View of Maher Hall and the Immaculata Church from Colachis Plaza.



Location 2. Alcalá Vista Apartments.

G/PROJECTS/MWS-01/ENV/EIR/Graphics/ Figs 5.8-3a & 5.8-3b

Key Photographs

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Figure 5.8-3a



Location 3. Southwestern view from on-campus vantage point near location of Site No. 22.



Location 4. Manchester Valley Field and Manchester Village Apartments.

G/PROJECTS/MWS-01/ENV/EIR/Graphics/ Figs 5.8-3a & 5.8-3b

Key Photographs

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Figure 5.8-3b



Viewpoint 1. Existing view looking southeast from Tecolote Canyon trail.



Viewpoint 2. Existing view looking southeast from Tecolote Canyon trail.

G:/PROJECTS/MWS-01/ENV/EIR/Graphics/ Figs 5.8-4a, 5.8-4b & 5.8-4c

Key Public Viewpoints

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.8-4a



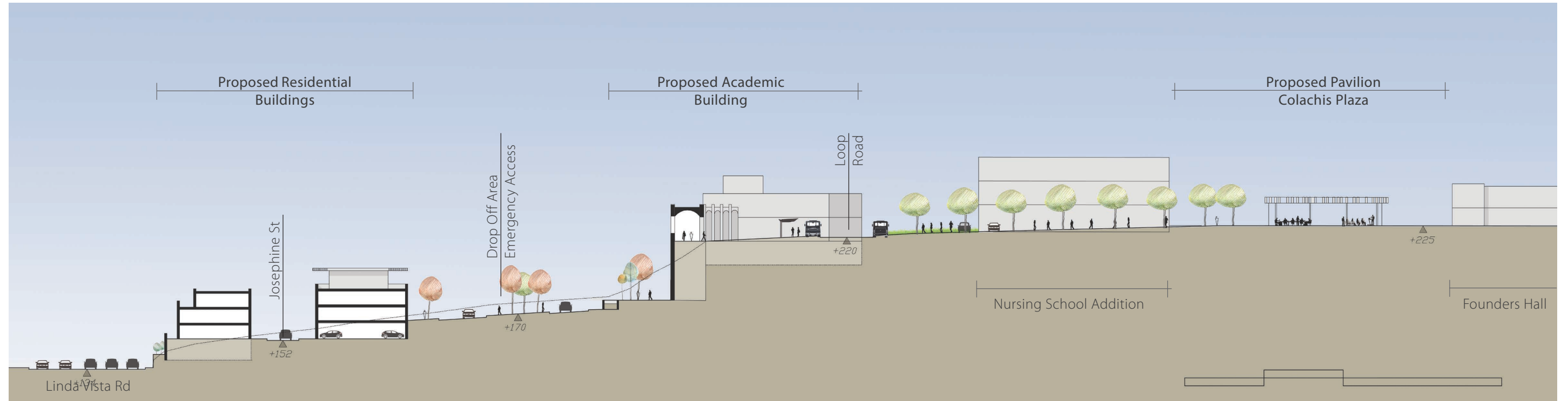
Viewpoint 3. Existing view looking northeast from Linda Vista Road/Napa Street intersection.



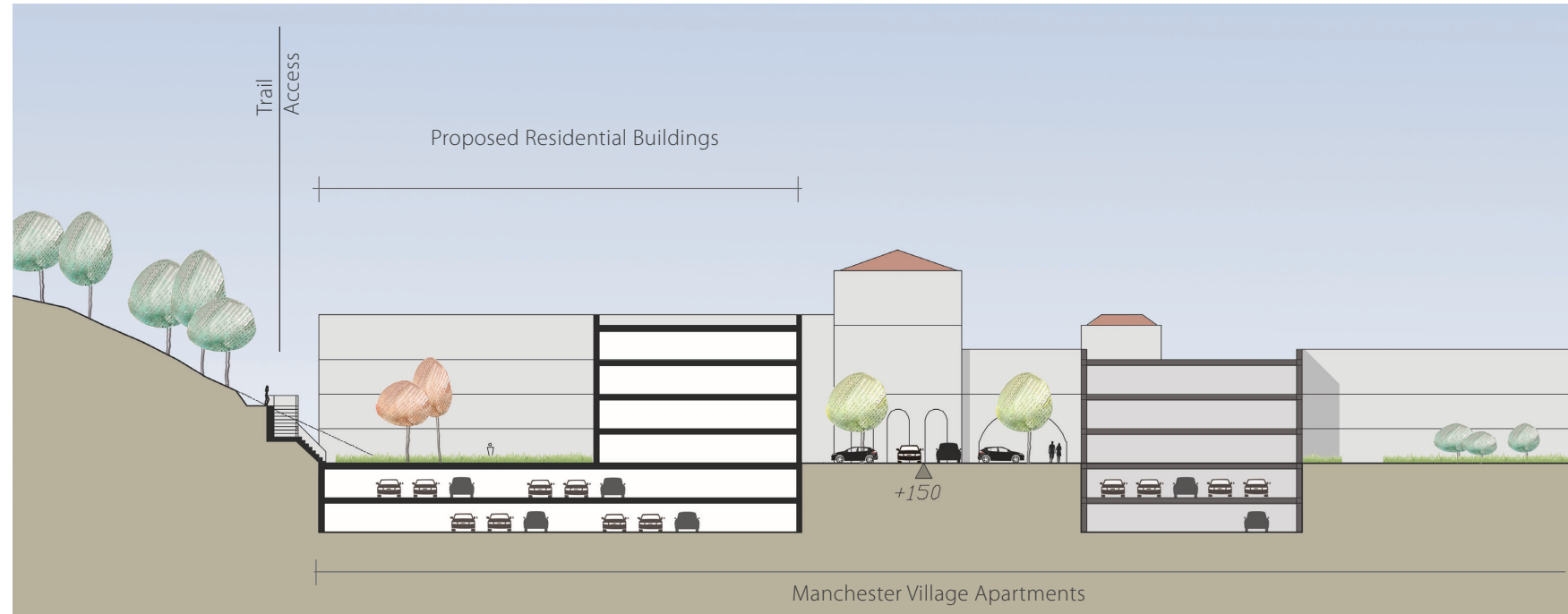
Viewpoint 4. Existing view looking southwest from just north of Linda Vista Road/Brunner Street intersection.



Viewpoint 5. Existing view looking northwest toward the University from Edward Tyler Cramer Park, located just southeast of the Alcala Parkway entrance.



Project Site Nos. 22 and 23



Project Site Nos. 30

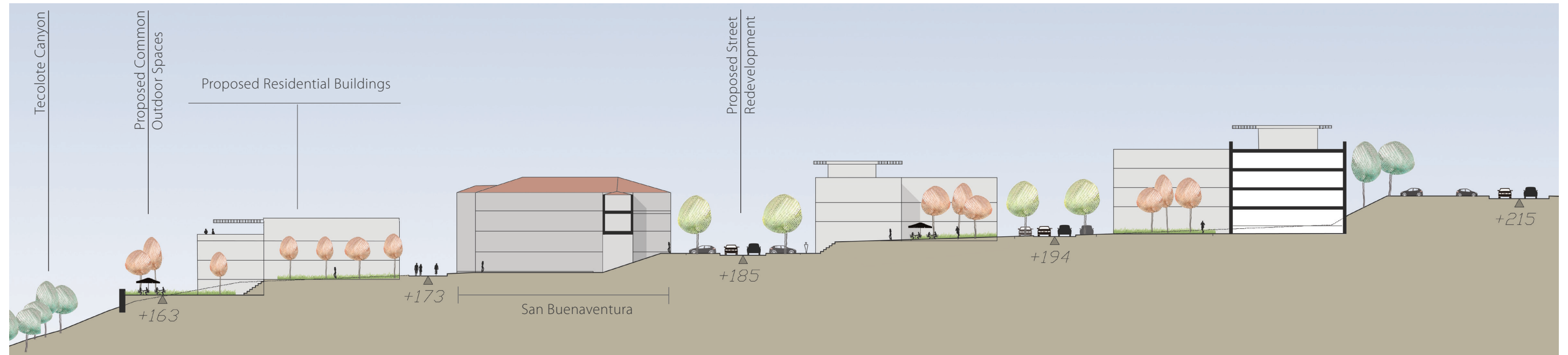
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Source: M.W. Steele 2016

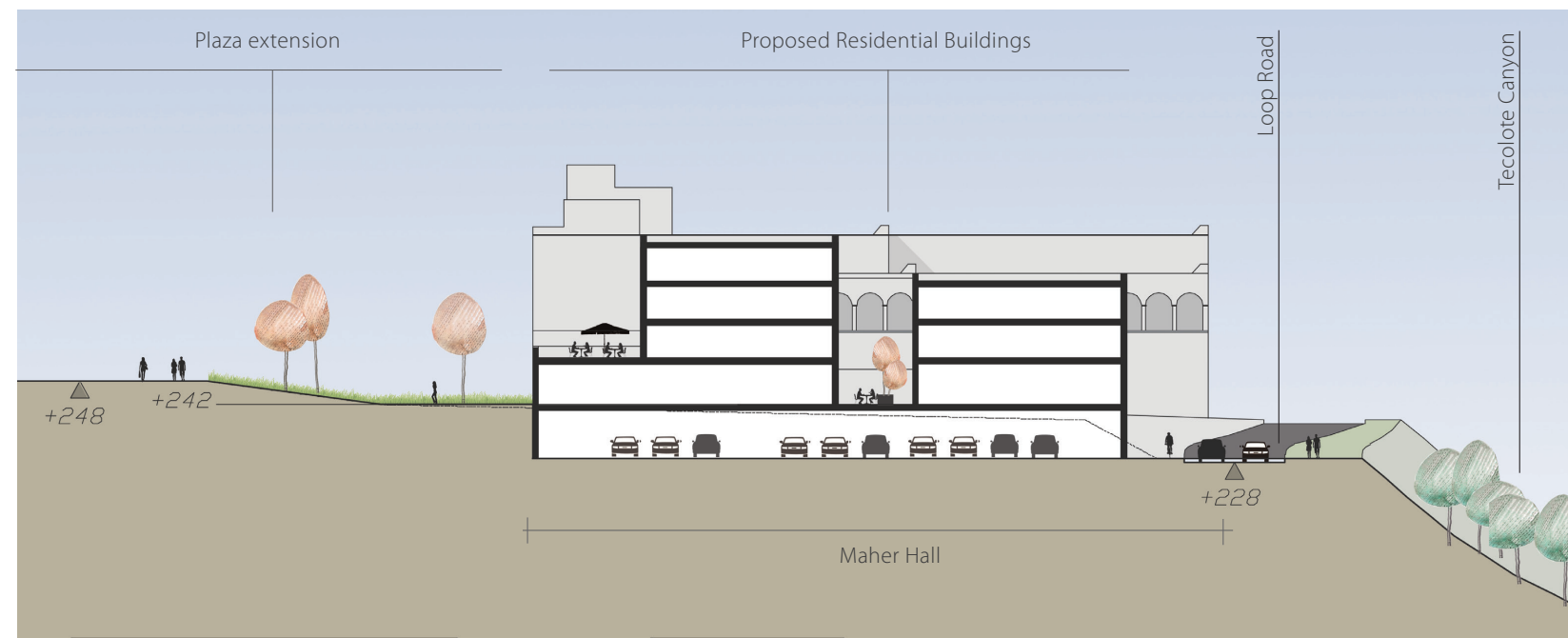
Conceptual Building Cross Sections

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.8-5a



Project Site Nos. 27



Project Site Nos. 24

Source: M.W. Steele 2016

Conceptual Building Cross Sections

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 5.8-5b

6.0 CUMULATIVE IMPACTS

Section 15130 of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) address cumulative impacts of a project when its incremental effect would be cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future projects.

According to Section 15130 of the State CEQA Guidelines, the discussion of cumulative effects "...need not provide as great a detail as is provided of the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness." The evaluation of cumulative impacts is to be based on either: "(A) a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative effect. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency."

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue and the project. In some cases, regional planning addresses cumulative impacts, while in other cases, the analysis takes into consideration more localized effects. For the Master Plan Update analysis of cumulative impacts which are localized (e.g., traffic and noise), a list of past, approved, and pending (i.e., active applications) projects within the Project area were identified by City staff based on their ability to contribute to and/or compound impacts with those of the Project. The location of these cumulative projects is provided in Figure 6-1, *Cumulative Projects*, and described in Table 6-1, *Cumulative Projects List*, along with a brief description of the development associated with these other projects. For other topics, like biological resources, the cumulative setting is the region's MSCP area.

The 1996 Master Plan Final Environmental Impact Report (FEIR) determined that implementation of the Master Plan would result in significant cumulative impacts to the issues of Traffic, Air Quality, Biological Resources, and Lighting. Specifically, the following conclusions were reached in the 1996 Master Plan FEIR: (1) the traffic analysis identified a significant and unmitigated impact to one street segment (East Morena Boulevard); (2) the air quality analysis determined there would be a cumulatively significant impact from the incremental emissions of criteria pollutants during construction due to the San Diego Air Basin's non-attainment status; (3) local and regional loss of sensitive biological resources was determined to be cumulatively significant but mitigated by project measures; and (4) increased outdoor night lighting was identified as a cumulatively significant impact on the local urban area that would be mitigated through compliance with the City's lighting ordinance. Cumulatively significant and unmitigated impacts to Traffic (on one road segment) and Air Quality (criteria pollutants) were identified in the 1996 Master Plan FEIR.

**Table 6-1
CUMULATIVE PROJECTS LIST**

No.	Project Name	Location	Description	Status
1	Civita (formerly Quarry Falls) – Phase 1	East of the SR-163 and north of Friars Road	2,477 residential units and 100,000 square feet of commercial	Approved/under construction
2	Union Tribune Master Plan	West of the SR 163/I-8 and south of Riverwalk Drive	Redevelopment of Union Tribune Office with 200 multi-family residential units and 3,000 square feet of retail	Approved
3	Legacy International Center	West of the SR 163/south of I-8 and south of Camino Del Rio South	Redevelopment of Mission Valley Resort Hotel with 127 timeshare rooms and 196,165-square foot religious facility	In review
4	Camino Del Rio Mixed Use	East of the SR-163 and north of the I-8	305 multi-family residential units, 5,000 square feet of office, and 4,000 square feet of retail	Approved/under construction
5	Hazard Center	East of the SR 163 and south of Friars Road	Redevelopment of Hazard Center movie theater with 473 multi-family residential units and 4,205 square feet of commercial/retail space	Approved
6	Friars Road Multi-Family	East of Fashion Valley Road and north of Friars Road	Redevelopment of commercial/office buildings with 320 multi-family residential units and 1,542 square foot shopkeeper space	In review Approved
7	Town & Country –	West of SR-163 and north of I-8	Redevelopment of hotel/convention/spa with 700 hotel rooms, 142,137 square feet of convention space, and 435 residential units	EIR out for public review In review
8	Riverwalk Master Plan/Levi Cushman Specific Plan	North of I-8 and west of Fashion Valley Road	Redevelopment of golf course with 1,329 residential units, 1,000 hotel rooms, 200,000 square feet of office and 2,582,000 square feet of retail	Unknown
9	Francis Parker School Master Plan Update	South of Linda Vista Road and east of Via Las Cumbres	140 student increase at existing school campus <u>and new campus development</u>	Approved
10	1996 Master Plan	USD Campus	16 entitled campus-related academic, administrative sports/recreation, and parking projects that remain unbuilt	Approved

6.1 Cumulative Effects Found To Be Significant

6.1.1 Transportation/Circulation

Implementation of the Master Plan Update in conjunction with other projects in the study area and area-wide growth (i.e., Year 2035 + Project scenario) would result in significant, cumulatively considerable impacts at three intersections and two roadway segments; no significant cumulative impacts to freeway mainlines or ramp meters would occur (see Section 5.2, Transportation/Circulation).

Cumulatively impacted locations in the project study area include:

Intersections

- Intersection No. 9: Linda Vista Road/Napa Street
- Intersection No. 11: Linda Vista Road/Colusa Way
- Intersection No. 13: Linda Vista Road/Alcalá Vista Apartments Entrance

Roadway Segments

- Segment No. 22: Friars Road; Avenida de las Tiendas to Avenida del Rio
- Segment No. 23: Friars Road; Avenida del Rio to Ulric Street/SR 163 SB Ramps

The intersection of Linda Vista Road and Napa Street (No. 9) is located within the Morena Corridor Specific Plan area, which will likely experience substantial mobility related improvements in the coming years. However, because planning for future improvements is still in the preliminary stages, multiple improvement options at this intersection are under consideration by the City and none of the potential options are definitive at this time. As a result, the project's cumulative impact to the Linda Vista Road/Napa Street intersection is considered significant and unmitigated, although the project applicant would financially participate on a "fair share" basis towards improvements to the project area, in accordance with mitigation measure Tra-2. The contribution would partially mitigate the project's cumulative impact; however, the scope of the improvement is undefined, balance of the cost for the preliminary improvement is unfunded, the timing of the improvement is unknown, and the improvement is not assured at this time.

Mitigation for significant cumulative impacts to the other two intersections would include the following: (1) signalization of the Linda Vista Road/Colusa Street intersection (Tra-3); and (2) signalization of the Linda Vista Road/Alcalá Vista Apartments Entrance intersection (Tra-4). These impacts would be reduced to less than significant levels with the mitigation in place.

With regard to the impacted road segments, The the Long-Term (2035) scenario assumes the fully funded Phase I of the SR 163/Friar's Road Interchange Project (Interchange Project), which includes improvements to the segment of Friars Road from Avenida de las Tiendas to Ulric Street / SR 163 southbound Ramps. The timing and scope of Phases II and III of the Interchange Project are yet to be determined, contingent on funding, and would likely not include further improvements to this segment. Since there are no improvement projects towards which the Project can contribute a fair share, this cumulative impact would remain significant and unmitigable. Refer to Section 5.2, *Transportation/Circulation*, for additional details on cumulative traffic impacts and required mitigation.

6.1.2 Air Quality

The region is a federal and/or state nonattainment area for PM₁₀, PM_{2.5}, and ozone. The MPU would contribute particulates and the ozone precursors VOC and NO_x to the area during short-term Project construction. As described in Section 4.2.1, regional emissions during construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Construction emissions would be less than the significance thresholds (Table 5).

As shown in the Project construction emissions evaluation, the emissions of NO_x, VOCs, PM₁₀, and PM_{2.5} would be below significance levels. Short-term cumulative impacts related to air quality could occur if construction of the Project and other projects in the surrounding area were to occur simultaneously. In particular, with respect to localized impacts, the consideration of cumulative construction particulate (PM₁₀ and PM_{2.5}) impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of (1) the combination of the short range (distance) of particulate dispersion (especially when compared to gaseous pollutants); and (2) the SDAPCD's required dust control measures which further limit particulate dispersion from a project site.

Among the projects outlined in the Master Plan Update are 16 entitled projects identified in the 1996 Master Plan FEIR that have previous City review/approvals but remain unbuilt. The 1996 Master Plan FEIR concluded that the USD Master Plan construction period emissions would result in a significant and unmitigable cumulative impact because of the non-attainment status of the SDAB and inability of one project to control emissions in the region. Because the Master Plan as analyzed in 1996 has not been fully built out and 16 entitled projects remain unbuilt, any added projects would only exacerbate the cumulative effect. As such, the Project would incrementally add to those construction period emissions and contribute to the cumulatively significant and unmitigable impacts disclosed in the previous EIR.

Long-term emissions, as shown in Table 5.5-6 in Section 5.5, would be well below regional thresholds, and, therefore, not cumulatively considerable. Emissions would be consistent with assumptions in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). Thus, long-term emissions would not produce a cumulatively significant impact.

As shown in Section 5.5, no exceedances of the CO standard are predicted, and the project would not cause or contribute to a violation of the air quality standard. The project would not result in a significant cumulative impact for CO.

6.2 ~~Cumulative Effects Found Not To Be Significant~~ Cumulatively Considerable

6.2.1 Land Use

As discussed in Section 5.1, *Land Use*, the effect of the project on land use would not be cumulatively considerable as the project would be a continuation of existing uses on campus and compatible with surrounding uses, and would comply with all applicable policies pertaining to the USD property. The Master Plan Update and its Design Guidelines would ensure that the project would be consistent with the City's General Plan, the Linda Vista Community Plan, zoning, and the applicable development regulations. Cumulative projects listed in Table 6-1 would be required to comply with the land use designations and zoning of their respective sites and/or make findings related to amending underlying planning designations/zones. Considering that the surrounding area is generally built out per the Community Plan and the project site would be compatible with surrounding uses, the project would not combine with other cumulative projects to result in a significant cumulative land use impact. In addition, cumulatively significant land use adjacency effects related to development adjacent to the Multi-habitat Planning Area (MHPA) would be avoided

through each project's required compliance with the Land Use Adjacency Guidelines of the Multiple Species Conservation Plan (MSCP) Subarea Plan. The project, when considered with the cumulative projects outlines in Table 6-1, would not result in a significant cumulative impact due to an inconsistency or conflict with and adopted land use plan, land use designation, or policy.

6.2.2 Biological Resources

As identified in Table 6-1, the cumulative setting for this analysis includes a number of projects in the Linda Vista and Mission Valley areas and the 16 unbuilt projects from the 1996 Master Plan. The Project would impact three sensitive vegetation communities on the USD campus. The MSCP, which was adopted since the 1996 Master Plan FEIR was certified, was designed to compensate for the cumulative loss of biological resources throughout the San Diego region, which would include potential impacts resulting from the Master Plan Update, as well as the cumulative projects listed in Table 6-1. Projects that conform to the MSCP as specified by the City's Subarea Plan and implementing ordinances, (i.e., Biology Guidelines and Environmentally Sensitive Lands [ESL] Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP.

The Master Plan Update would comply with the City's Subarea Plan by conforming to the MHPA Land Use Adjacency Guidelines and Area Specific Management Directives for Covered Species and by mitigating for significant impacts in accordance with ESL Regulations and the City's Biology Guidelines. Each of the projects in the cumulative study area (Table 6-1) would undergo similar reviews in terms of determining potential impacts to biological resources and would also be required to comply with the City's Subarea Plan and obtain a Site Development Permit (SDP) to authorize impacts to ESL. Therefore, the project would not contribute considerably to cumulatively significant impacts on sensitive biological resources in the City.

6.2.3 Historical Resources

Development in the San Diego region has resulted in the loss of historical built environment and archaeological resources over time. This has resulted in a significant cumulative regional loss of resources. However, environmental legislation, including City policies, protecting historic and archaeological resources has diminished the likelihood that built resources or discovered resources would be destroyed without proper treatment or contact with appropriate Native American descendants and/or data recovery, as appropriate.

Built Environment

As described in Section 5.4, *Historical Resources*, potentially significant impacts to historic structures are identified due to proposed additions or modifications to structures greater than 45 years old or structures that are or would become that old during the lifetime of the Master Plan Update. Mitigation would require a historic resources evaluation be conducted at the time of Substantial Conformance Review to determine whether or not an affected structure is historic, in accordance with the City's Historic Resources Regulations. Each of the projects in the cumulative study area (Table 6-1) would undergo similar reviews in terms of determining the presence of historical resources, in particular the projects involving demolition or redevelopment of urbanized land. Similar treatment of potential resources is anticipated (if applicable) during construction, ensuring

no resources are destroyed without consideration for historic resources. As a result, the project would not result in a cumulatively considerable contribution to the loss of regional historic resources.

Archaeological Resources

No known archaeological sites of significance would be impacted by the Project, as described in Section 5.4. Nonetheless, mitigation, in the form of monitoring, would be implemented during construction to avoid or reduce potential impacts to unknown subsurface resources to below a level of significance. Each of the projects in the cumulative study area (Table 6-1) would require review in terms of determining the presence of archaeological resources and the potential for unknown buried resources. Similar treatment of potential resources is anticipated (if applicable) during construction, ensuring no resources are destroyed without appropriate Native American contact. As a result, the project would not result in a cumulatively considerable contribution to the loss of regional archaeological resources.

6.2.4 Hydrology/Water Quality

As described in Section 5.6, *Hydrology/Water Quality*, implementation of the Master Plan Update would require conformance with a number of regulatory requirements related to hydrology and water quality, including applicable elements of the Clean Water Act (CWA), National Pollutant Discharge Elimination System (NPDES), and related City storm water standards. Based on such conformance and related project design measures, all identified project-level hydrology and water quality impacts from the project would be avoided or reduced below a level of significance.

The described regulatory requirements constitute a regional effort to implement hydrology and water quality protections through a watershed-based program designed to meet applicable criteria such as Basin Plan Beneficial Uses and Water Quality Objectives. To this end, these standards require the implementation of efforts to reduce runoff and contaminant discharges to the maximum extent practicable (MEP), with the NPDES Municipal Permit identifying the goal of "...promoting attainment of water quality objectives necessary to support designated beneficial uses." The City has implemented all of these requirements in the form of the City Drainage Design and Storm Water Standards manuals; related Municipal Code/General Plan standards and ordinances; and applicable education, planning, and enforcement procedures. Based on the described regional/watershed based approach required for hydrology and water quality issues in existing regulatory standards, as well as the fact that conformance with these requirements would be required for all identified cumulative projects (including the Master Plan Update and the projects provided in Table 6-1), cumulative hydrology/water quality impacts would be less than significant.

6.2.5 Public Utilities

The cumulative projects in the study area would also address their project's water demand and supply. Certain types of projects subject to Senate Bills 610 and 221 would be required to obtain a Water Supply Assessment (WSA) Report from the City Public Utilities Department (PUD) demonstrating there would be sufficient potable water supplies to serve the project's demand; the individual project WSAs would take into consideration cumulative water demand within the City as a whole. A WSA was prepared for the project by the PUD. It was determined that there would be

sufficient supplies to satisfy projected demands in both regular and dry years. Therefore, as noted in Section 5.7, the Project would not contribute to significant water supply impacts that would be cumulatively considerable.

As discussed in Section 5.7, *Public Utilities*, the Project would not result in significant impacts to water infrastructure, while significant impacts to wastewater infrastructure would be expected. The cumulative projects addressed in this analysis would be also required to assess their impacts on water and wastewater infrastructure. Although potentially significant wastewater infrastructure impacts could occur during buildout of the Master Plan Update; the Project's impacts would be resolved through upgraded infrastructure at the time the University submits plans for the project sites in the affected sewer basin. Pending and future cumulative projects listed in Table 6-1 would be required to analyze the capacity of wastewater infrastructure that would serve the projects to verify sufficient capacity; however, only the 16 entitled projects would contribute to the same sewer basin affected by the Project. If infrastructure deficiencies are identified elsewhere within the cumulative study area, the cumulative projects may be required to provide facility upgrades to address system deficiencies. The Project would not contribute to any cumulatively significant impacts to water or wastewater infrastructure.

According to the City's Significance Determination Thresholds (City 2011), construction, demolition, or renovation of projects greater than 40,000 square feet would have the potential to generate 60 or more tons of solid waste annually and are considered to have cumulative impacts on solid waste facilities. For projects over 1,000,000 square feet, a significant cumulative solid waste impact would result if the compliance with the City's ordinances and the WMP fail to reduce the impacts of such projects to below a level of significance and/or if a WMP for the project is not prepared and conceptually approved by the ESD prior to distribution of the draft environmental document for public review.

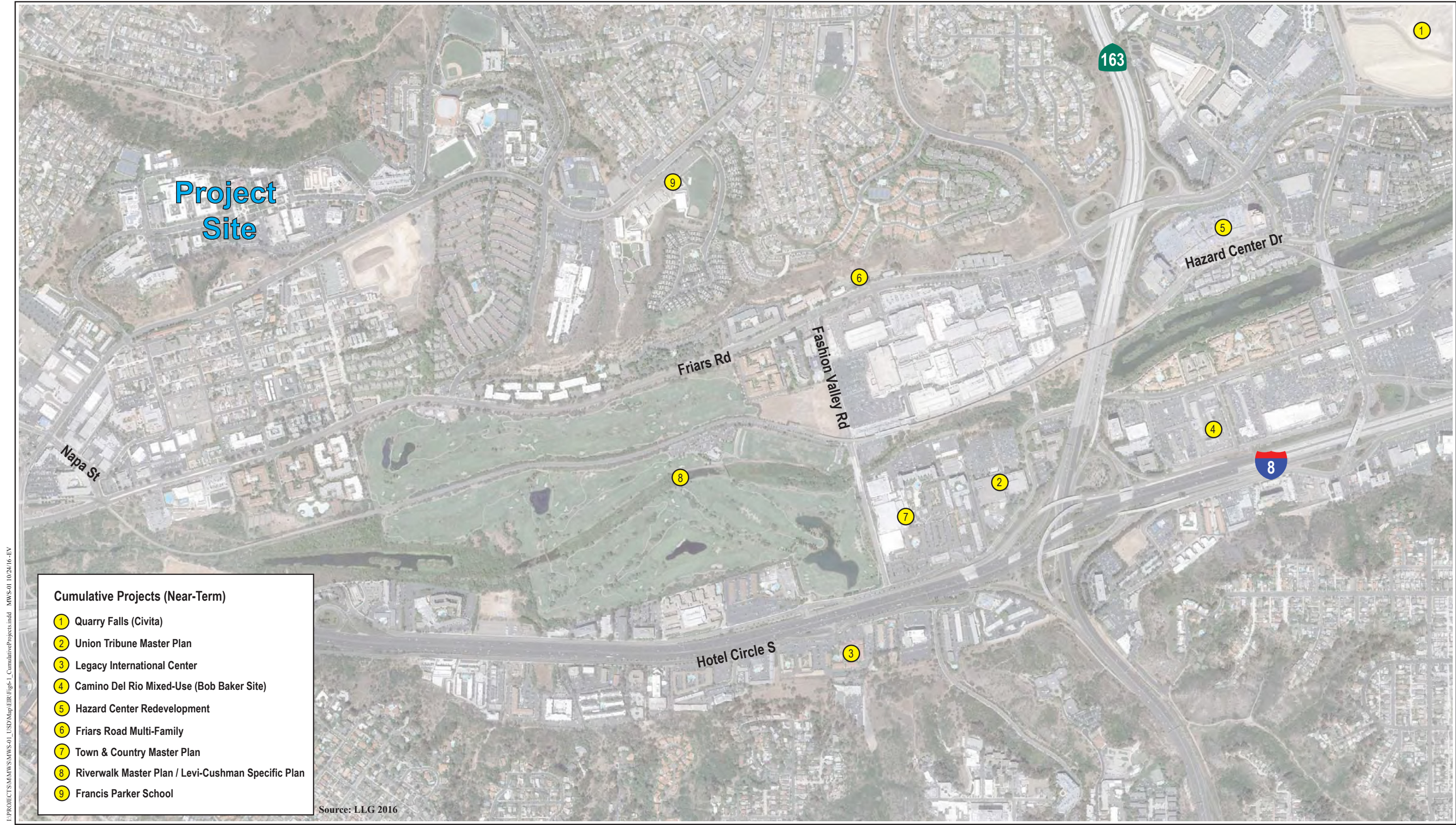
Because the project would construct a maximum of 922,230 gross square feet (GSF) of Master Plan Update facilities, a Waste Management Plan (WMP) was prepared (HELIX 2016b) for review and approval by Environmental Service Department. The purpose of the WMP is to identify the potential waste generated and diverted from the project, and reduce solid waste generated by the project, as mandated by the state and City. The WMP is contained in Appendix K and summarized in Section 5.7. Similarly, cumulative projects of large enough sizing would also be required to prepare WMPs demonstrating similar waste reduction. Implementation of the WMP through permit conditions would ensure that the project's contribution to cumulative solid waste impacts would be less than significant.

Given the incorporation of necessary construction, operations, and site design standards, plus additional analysis by the City to confirm utility capabilities when project-specific development plans have been finalized, no substantial contribution to a cumulative impact would be anticipated.

6.2.6 Visual Effects/Neighborhood Character

The cumulative study area for visual impacts consists of the project site's viewshed. A viewshed is the area within which the project site would be visible. None of the projects identified in Table 6-1 are located within the same viewshed as the project. The cumulative impacts of the Master Plan Update on the viewshed would be less than significant given (1) scenic resources (i.e., steep slopes)

within the project viewshed would not be significantly impacted by the Master Plan Update upon implementation of Mitigation Measure Vis-1 that requires special design requirements for slopes that are to be graded; (2) the University is not located within proximity to a state scenic highway; (3) development of the Master Plan Update, previously approved on-campus projects, and other projects within the cumulative study area would be consistent with the existing urbanized character of the project viewshed; and (4) future projects and existing development would comply with the City's outdoor lighting regulations to avoid glare and nighttime lighting impacts.



Cumulative Projects

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 6-1

7.0 OTHER CEQA SECTIONS

7.1 Effects Found Not To Be Significant

Potential impacts related to implementing the USD Master Plan were previously evaluated in the certified 1996 Master Plan Final Environmental Impact Report (FEIR), which determined that the 1996 Master Plan would have less than significant impacts to Noise, Water Quality, Natural Resources, Hazardous Materials, Population/ Housing, Public Services, Utilities, and Energy. Revisions to the project components evaluated in the prior California Environmental Quality Act (CEQA) document are proposed under the current Master Plan Update. The City has determined that the 14 new project sites that would be implemented under the Master Plan Update would not have the potential to cause significant impacts for the following issue areas, with these topics briefly addressed below. Refer to the EIR scoping discussion contained in Section 1.3 for additional information.

- Agriculture and Forestry Resources
- Energy
- Geologic Conditions
- Health and Safety
- Mineral Resources
- Noise
- Population and Housing
- Public Services and Facilities

7.1.1 Agriculture and Forestry Resources

Agriculture

The City Significance Determination Thresholds (2011) state that a significant impact on agricultural resources may result from a project which involves the conversion of a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation (CDC), to non-agricultural use. As mapped by the CDC, the entire USD campus is designated as Urban and Built-up Land, with adjacent portions of Tecolote Canyon designated as Other Land and no on-site or adjacent areas encompassing Williamson Act contract lands (CDC 2016a and 2016b). In addition, none of the soils identified within USD are designated as Prime Farmland or Farmland of Statewide Importance candidate soils. Candidate soils typically meet most (but not all) of the soil criteria identified for the CDC Prime Farmland or Farmland of Statewide Importance designations (County of San Diego 2007). Based on the described conditions, implementation of the Project would not result in the conversion of agricultural resources to non-agricultural uses.

Forestry Resources

The USD campus is located in an area that does not support timber growth, with the 14 project sites mostly developed or disturbed, and existing undeveloped areas supporting arid scrubland or minor riparian corridors. Based on the described conditions, the project sites do not exhibit potential to support commercially viable forestry resources, and no associated significant impacts would result from Master Plan Update implementation.

7.1.2 Energy

Neither the CEQA Guidelines Appendix G nor the City of San Diego's CEQA Significance Determination Thresholds (2011) contain specific criteria to identify when a significant energy-use impact has occurred. State CEQA Guidelines Appendix F, Energy Conservation, provides direction as to the type of information, analysis, and mitigation that should be considered in evaluating a project, but does not provide specific energy conservation thresholds. For the purposes of this SEIR and in accordance with Appendix F of the State CEQA Guidelines, the Project would result in a significant impact to energy conservation if it would: (1) cause inefficient, wasteful, and unnecessary consumption of energy during construction, operation, and/or maintenance; and/or (2) conflict with or exceed the California Building Code (CBC) Energy Efficiency Standards (part of Title 24), the San Diego Association of Governments (SANDAG) 2009 San Diego Regional Energy Strategy renewable energy goals, the City of San Diego General Plan Conservation Element goals, or any other applicable energy conservation regulations.

Under the influence of population growth, energy usage is projected to increase in the future (SANDAG 2003). According to San Diego Regional Energy Office's (SDREO's) San Diego Regional Energy Infrastructure Study, San Diego County will face significant supply issues and risks unless additional supply options are made available (SDREO 2003). Although long-term electrical consumption rates are projected to increase, savings from energy efficiency programs is anticipated (California Energy Commission [CEC] 2009a). Similarly, natural gas consumption rates are expected to increase over time (SANDAG 2009). Energy required to support water sector operations, as well as serve water customers, is also a factor when accounting for the state's increasing energy demands. For instance, energy is used to treat water and get it to the customer, to transport the wastewater from the customer and dispose of it, and to provide groundwater pumping and surface water pumping. Since population growth drives demand for both of these resources, water and energy demand are growing at about the same rate and in many of the same geographic areas according to the CEC (CEC 2007). On-road transportation is another large consumer of energy, and is almost entirely dependent on petroleum-based fuels (gasoline and diesel). Without changes in policy or behavior, on-road consumption of petroleum-based fuels is expected to increase considerably by 2020 and through 2030 (SANDAG 2009).

Estimates vary on what level of future energy reductions will be attributed to efficiency programs and standards over the next decade, depending on the assumptions used. The California Public Utilities Commission (CPUC) estimates that in the San Diego region, efficiency programs will achieve gross savings of 1,514 gigawatt hours (GWh) and 52 million therms between 2012 and 2020, the largest contributor to energy reductions over this period (USD EPIC 2009). A number of federal, state and local regulations and programs also are in place to decrease energy consumption and increase efficiencies, and the University operates numerous energy reduction and conservation programs on

campus, as described in the *Sustainability Features* discussion within Section 3.0, *Project Description*. The University has ways to reduce water and energy use, as well as increase renewable energy generation and waste diversion on campus. In addition to expanding existing sustainability programs, the University would introduce new practices and features to address conservation as it implements the Project (addressed below), thereby setting goals to minimize the campus' energy consumption and that of the larger region. Such efforts by the University, combined with its compliance with the CBC Title 24 standards, contribute to the City's goals concerning sustainability—specifically energy efficiency, alternative modes of transportation, sustainable planning and design, and waste management.

Also at the City level, the General Plan Conservation Element establishes a series of goals and objectives pertaining to sustainable development and sustainable energy, which are intended to help reduce energy-use impacts of development (City 2008a). These goals and objectives include actions to be taken by City government, as well as actions that can be taken by individual projects throughout the City. The various sources of energy usage associated with the Project include those associated with building demolition; construction and operation of new and internally renovated buildings (natural gas, purchased electricity); water consumption (energy embodied in the transport and treatment of potable water); solid waste management (including transport and landfill gas generation); and vehicles (staff maintenance vehicles and those driven to/from campus by students, faculty, and staff). As addressed in detail in Section 5.1, *Land Use*, the Project was found to be consistent with applicable goals and policies from the General Plan Conservation Element. In many instances, the University is already operating under these principals and would continue to do so under the Project; in other cases, many of which are described below, these principles and practices would be newly implemented as part of the Project. The Project would implement many of the City's goals and policies through a combination of on-campus mobility improvements to encourage alternative modes of travel, while the University's Transportation Demand Management program would do the same for the off-campus local circulation system. The Project would implement a WMP to reduce construction and demolition waste, resulting in fewer truck trips to the landfill and less material deposited in landfill. Project landscaping would include water conservation measures and drought-tolerant plant materials, and would conform to the landscape and irrigation standards set forth by the City. The Project would adhere to CBC requirements for water-conservation plumbing. New buildings and additions on campus would be designed to meet the minimum energy savings and sustainable design standards of U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Silver or equivalent. Renewable energy sources such as photovoltaic (PV) arrays and solar thermal systems would be incorporated into individual project sites where feasible. Taken all together, these efforts support the City's sustainable energy goals of increasing local energy independence through conservation, efficient design, reduced consumption, and efficient production and development of energy supplies.

Through the implementation of the Master Plan Update, the campus would implement institution-wide sustainability initiatives and principles that direct the growth of campus with respect to land use decisions, development density, transportation management, and building and landscape design strategies, as summarized in Section 3.0, *Project Description*. Specifically, the Master Plan Update would implement the following design features that would minimize energy usage on campus:

- siting of buildings to take advantage of natural daylight and prevailing winds;
- orienting and designing buildings to reduce heat gain and maximize cooling loads (e.g., by installing green roofs where feasible);
- using solar photovoltaic panels and solar water heating systems where feasible;
- providing preferred parking for alternative fuel vehicles, as well as electric vehicle charging stations;
- encouraging use of alternate forms of transportation and reducing dependencies on single-occupancy vehicles through improvements to campus shuttle, pedestrian, and bicycle facilities;
- incorporating efficient, automated irrigation systems with weather-sensing technologies;
- removing, converting, or replacing turf;
- using grey water systems, rainwater harvesting, or municipal recycled water where feasible;
- designing with low-water use and/or native landscaping materials to minimize irrigation demands;
- using carefully selected plant and tree species to reduce water use and maintenance requirements, and provide solar shading during summer, often reducing the “Urban Heat Island Effect,” and solar gain during winter;
- installing low-flow fixtures (toilets and showers);
- continuing to promote and expand the campus’s recycling program, including consideration of a compost program; and
- re-using existing materials and/or incorporating materials that are locally or regionally available, and/or made with recycled content or rapidly renewable materials.

The Project would implement the goals and policies of the City’s Conservation Element pertaining to energy conservation as described above and detailed further in Table 5.1-1. The Project features, specifically the integration of solar technology, would also be consistent with the CBC Title 24 standards and SANDAG’s renewable energy goals. All new buildings and additions would be LEED Silver (or equivalent).

Finally, reductions in energy use would occur over the period of years during which the Master Plan Update projects would be implemented due to (1) state-wide regulations placed on auto and fuel manufacturers that would reduce vehicle emissions associated with the expanded campus enrollment; (2) campus compliance with the CBC Title 24 Energy Code; (3) campus compliance with Assembly Bill 75, which requires 50-percent diversion of ongoing operational waste through reuse and recycling; and (4) the California Green Building Standards Code (CALGreen), which requires a 20 percent reduction in potable water use and wastewater generation.

Although the Project could result in increased energy consumption due to an enrollment increase of 3,000 full-time equivalent (FTE) on campus, as well as numerous new buildings, the Project is not expected to require excessive amounts of energy; require use of new sources of energy; result in the wasteful, inefficient, or unnecessary consumption of energy; or conflict with any adopted energy conservation plans. As a result of the conservation efforts and regulatory compliance, implementation of the Master Plan Update would result in less than significant energy impacts.

7.1.3 Geologic Conditions

Geologic conditions and associated potential hazards were assessed in a Geotechnical Feasibility Evaluation conducted for the Master Plan Update by Kleinfelder (2016a; Appendix L). The evaluation included: (1) review of the Geotechnical Investigation prepared for the previous Master Plan by Woodward-Clyde Consultants, Inc. (Woodward-Clyde, 1996); (2) review of other applicable background materials such as the City Seismic Safety Study (2008a), geologic reports/maps and historic aerial photographs; (3) site reconnaissance; and (4) preparation of a feasibility analysis to evaluate potential geologic hazards. Kleinfelder also reviewed the following geologic and geotechnical information (2016b; Appendix L) as part of the SEIR preparation process.

The City Significance Determination Thresholds (2011) identify potentially significant geologic impacts based on the City Seismic Safety Study, which documents geologic conditions and potential hazards within the City and provides direction for the appropriate type(s) of geotechnical investigation(s) based on geology, related hazard potential and proposed development types. The project sites are mapped as exhibiting nominal to low, and low to moderate geotechnical risks, according to the Seismic Safety Study and the Public Services, Facilities and Safety Element of the General Plan (City 2008b). Specifically, the 14 project sites include areas mapped under the following Geologic Hazards Categories: Category 12 (Fault Zones, potentially active, inactive, presumed inactive, or activity unknown, low to moderate risk); Category 23 (Friars Formation, potentially slide-prone, low to moderate risk); Category 51 (level mesas, nominal to low risk); and Category 52 (other level areas, nominal to low risk).

The USD campus is located on a relatively level surface formed by near-shore (paralic) marine wave action, with the current local canyon system produced by subsequent drainage downcutting. Geologic formations identified within or adjacent to the project sites include the Quaternary-age Lindavista Formation (or very old paralic deposits) and Bay Point Formation (or old paralic deposits); as well as the Tertiary-age San Diego, Friars and Scripps formations.

The USD campus, like all of southern California, is located within a seismically active area and is likely to experience ground shaking from earthquake events along local or regional faults. The Rose Canyon and Elsinore fault zones dominate the seismicity of the Project area.

Shallow groundwater, seeps, and/or springs were not observed during surface and subsurface investigations conducted during onsite geotechnical analyses, with the exception of groundwater encountered at an elevation of 14 feet above mean sea level (AMSL) (a depth of approximately 30 feet below the surface) in the extreme western portion of campus (Kleinfelder 2016). Perched groundwater may develop along the interface of more permeable fill soils and less permeable formational materials, however, particularly within infilled drainages. Perched aquifers generally consist of unconfined (i.e., not under pressure) groundwater contained by impermeable or

semi-permeable strata, with the presence and/or extent of such groundwater bodies typically associated with and influenced by seasonal precipitation and local irrigation.

While a pre-development (design-level) geotechnical investigation cannot be prepared at this time due to the lack of design detail required to conduct the study, all of the projects proposed under the Master Plan Update would be required to have a pre-development (design-level) geotechnical investigation prepared pursuant to the City of San Diego Development Services' Information Bulletin 515. The geotechnical investigation report(s) should be prepared in accordance with the City's "Guidelines for Geotechnical Reports." A summary of potential geologic hazards on the USD campus is provided below.

Surface Fault Rupture

The Project Geotechnical Feasibility Evaluation identifies a low potential for fault rupture hazards on the USD campus, with the exception of the area in the vicinity of Project Site No. 18 (Parking/Administrative/Physical Plant), which exhibits a moderate potential related to a suspected fault adjacent to this site (Kleinfelder 2016). The potential occurrence, location and activity of this fault is not known at this time since this feature is not shown on published geologic maps and is only suspected from Kleinfelder's analysis of vintage aerial photography, which indicates possible historical fault related features in the modern landscape. The suspected fault is mapped 50 feet from the proposed building location. The Project Geotechnical Feasibility Evaluation also notes that the closest mapped active faults and associated Earthquake Fault Zones designated by the California Geological Survey (CGS) are located approximately two miles to the northwest along the Rose Canyon Fault Zone. Based on the noted occurrence of faulting in the immediate vicinity of Project Site No. 18, a site-specific fault investigation would be conducted at the site as part of the noted design-level geotechnical investigation prepared for the Project (in accordance with applicable City guidelines). Specifically, the analysis would verify both the potential occurrence of faulting and the associated activity status if faulting is encountered. If active faulting is identified, associated standard measures, such as building setbacks, would be required to remediate potential impacts and ensure conformance with applicable regulatory requirements. Incorporation of required design features, such as setbacks, into the construction-level plans for Project Site No. 18 and compliance with the California Building Code and other applicable regulatory standards would reduce risks to acceptable levels and ensure that less than significant surface fault rupture impacts would occur.

Seismic Ground Shaking

As noted above, the USD campus is subject to ground shaking from earthquake events along local or regional faults, including the Rose Canyon and Elsinore fault zones. While this could potentially result in related impacts to proposed facilities, individual project implementation would incorporate appropriate design and construction measures to accommodate projected seismic loading, pursuant to applicable industry/regulatory requirements (e.g., City and California Building Code [CBC] standards), recommendations from the Project Geotechnical Feasibility Evaluation, and pertinent updates from the previously noted design-level geotechnical investigation. Specifically, this may involve standard efforts such as incorporating applicable seismic loading factors into the design of facilities such as structures, foundations/slabs, pavement and utilities; related activities including remedial grading (e.g., removing/replacing and/or reconditioning unsuitable soils); appropriate manufactured slope, retaining wall and drainage design; and proper fill composition/placement

(i.e., engineered fill). Furthermore, building designs would be in accordance with the California Building Code and other applicable regulatory standards to reduce risks related to ground shaking.

Liquefaction

Earthquake-induced soil liquefaction is generally defined as a significant loss of soil strength and stiffness caused by an increase in pore water pressure resulting from cyclic loading during ground shaking. Liquefaction is most prevalent in loose to medium dense, sandy and gravelly soils below the groundwater table. The potential consequences of liquefaction to engineered structures include loss of bearing capacity, buoyancy forces on underground structures, ground oscillations (or “cyclic mobility”), increased lateral earth pressures on retaining walls, post-liquefaction settlement, lateral spreading and “flow failures” in slopes. The Project Geotechnical Feasibility Evaluation concludes that liquefaction is not considered a significant risk to the Project, due to dense soil conditions and the anticipated lack of shallow groundwater. Furthermore, building designs would be in accordance with the California Building Code and other applicable regulatory standards to reduce risks related to liquefaction and less than significant impacts are identified.

Seismic Compression

Seismic compression results from the accumulation of strain in unsaturated soil during earthquake-related ground shaking. Loose to medium dense granular material with no fines or low plasticity fines are most susceptible to seismic compression. Based on the anticipated depth of fill over very dense formational soil and the character of the proposed fill, the Project Geotechnical Feasibility Evaluation notes that total seismic compression settlement is anticipated to be limited to approximately 0.25 inch, with this preliminary assessment to be further evaluated in the noted design-level investigation, particularly for areas of deeper fill. If potential seismic compression hazards are identified during this analysis, associated remedial measures would be identified to address related concerns, potentially including standard efforts such as removal of unsuitable soils and replacement with engineered fill, soil densification (e.g., introducing cement to consolidate loose soils), and use of appropriate foundation design to provide support. Compliance with the California Building Code and other applicable regulatory standards would ensure that less than significant seismic impacts would occur.

Landslides and Slope Instability

Landslides are deep-seated ground failures (tens to hundreds of feet deep) in which a large section of a slope slides downhill (as opposed to smaller slope failures such as surficial slumps which are usually limited to the upper several feet of the slope surface). Undermining of foundations can damage structures above the slide area, while areas below a slide can be damaged by being overridden and crushed by the failed slope material. As previously indicated, the Friars Formation is associated with Geologic Hazards Category 23, and exhibits low to moderate geotechnical risk related to zones of weakness (clay interbeds) that can affect slope stability. This formation is mapped in the eastern portion of the campus, and potentially underlies portions of Project Site Nos. 29 (Facilities/Athletic Support) and 30 (Student Housing/Student Services/ Parking/Athletics).

The Project Geotechnical Feasibility Evaluation identifies potential landslide and slope instability hazards as low for the majority of the campus, based on factors including the relatively level ground surface, the distance from slopes for most proposed development, the presence of very dense

formational materials, geologic structure, investigation of mapped landslide features, and professional judgment. Due to the location of Project Site No. 22 (Academic/ Administrative) on steeper slopes, however, geologic cross sections and preliminary slope stability analyses were prepared for applicable portions of this site. The results of these analyses indicate that: (1) minimum safety factors for manufactured slopes at Project Site No. 22 exceed conventional minimum standards; (2) remedial grading would not be required at this site to address potential slope instability, with measures to address any potential concerns likely to consist of conventional keying and benching; (3) additional analyses for other project sites are not warranted at this time; and (4) site-specific slope stability analyses would be conducted as part of the previously described design-level geotechnical investigation. Compliance with the California Building Code and other applicable regulatory standards would ensure that less than significant landslide and slope instability impacts would occur.

Expansive Soils

Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may result in unacceptable settlement or heave of structures or concrete slabs supported on grade.

The Project Geotechnical Feasibility Evaluation notes that the majority of on-site soils exhibit very low to low expansion potential (per CBC criteria), although soils with moderate expansion potential may be present locally near the surface where the Lindavista Formation is highly weathered. If expansive soils are observed during the previously described design-level geotechnical investigation, the Project Geotechnical Feasibility Evaluation concludes that associated remedial measures would be limited to standard efforts such as removal of expansive soils and replacement with engineered fill, and/or segregation of expansive soils where exposed near finish surface in structural areas. Compliance with the California Building Code and other applicable regulatory standards would ensure that less than significant expansive soils impacts would occur.

Tsunamis and Seiches

Tsunamis are large sea waves which can reach over 50 feet in height, and are usually generated by rapid displacement on a submarine fault or submarine landslide. Tsunamis can travel at speeds of hundreds of miles per hour over distances of thousands of miles. Large tsunamis can travel well beyond the normal wave break of the shoreline and cause damage to nearshore structures. A seiche is an oscillation (wave) of a body of water in an enclosed or semi-enclosed basin that varies in period, depending on the physical dimensions of the basin, from a few minutes to several hours, and in height from several inches to several feet. Seiches are caused chiefly by local changes in atmospheric pressure, aided by winds, tidal currents, and occasionally earthquakes (ground shaking). Because the Project site is located approximately three miles inland and at elevations of approximately 50 to 260 feet AMSL, the Project Geotechnical Feasibility Evaluation concludes that potential hazards related to a tsunamis or seiches are considered low.

Based on the described analyses, required completion of the noted design-level geotechnical investigations pursuant to applicable City and related guidelines, and mandatory conformance with associated regulatory requirements and geotechnical recommendations, potential Project-related

geologic hazards from implementation of the Master Plan Update would be reduced to acceptable levels of risk and be less than significant.

7.1.4 Health and Safety

The City Significance Determination Thresholds (2011) require that the environmental review process include steps to disclose and address the safe removal, disposal and/or remediation of hazardous materials in conformance with applicable federal, state and local government standards and requirements. The Project would involve the limited use of some hazardous materials during construction, such as fuels, lubricants and paint/solvents. Contractors and appropriate construction workers would be educated about protective measures in handling and disposal of such materials, with additional related BMPs to be implemented pursuant to requirements under the previously described National Pollutant Discharge Elimination System (NPDES) General Construction Activity Storm Water Permit (e.g., proper hazardous material storage and containment). In addition, if older (pre-1978) structures are proposed for demolition/removal under the Project, lead-based paint (LBP) and/or asbestos-containing materials (ACMs) may potentially be present and would require appropriate handling/disposal. Specifically, this would entail mandatory conformance with applicable associated regulatory controls, including Section 9021.5 of the state Labor Code; California Code of Regulations (CCR) Title 8, Section 1532.1; CCR Title 17, Division 1, Chapter 8; CCR Title 22, Division 4.5; and Air Pollution Control District (APCD) regulations for demolition methods and dust suppression (including APCD Rule 361.145).

Based on review of the California Environmental Protection Agency (CalEPA) Cortese List Data Resources, there are no identified hazardous material or related sites within or adjacent to the 14 projects under the Master Plan Update (CalEPA 2016). Specifically, the Cortese List Data Resources include: (1) the California Department of Toxic Substances Control (DTSC) EnviroStor and Hazardous Waste Facility Corrective Action databases; and (2) the State Water Resources Control Board (SWRCB) GeoTracker, Solid Waste Disposal Site, and Cease and Desist/Cleanup Abatement Order (CAD/CAO) databases. In addition, due to the nature of the 14 project sites under the Master Plan Update, the routine transport, use or disposal of hazardous materials is not anticipated during long-term project operations.

The City Significance Determination Thresholds (2011) also identify potential public safety/public health issues associated with projects that are: (1) located within and/or in close proximity to airports, flood-prone areas, or areas susceptible to brush fires; (2) susceptible to disease-carrying vector exposure, sewage spills, or electromagnetic field (EMF) effects associated with electric transmission lines and communications facilities; and (3) in proximity to former or active underground storage tank sites, fuel-storage tank farms, sewage treatment plants, or areas where toxic chemicals may be stored.

Pursuant to mapping provided in the General Plan Final Program EIR (2008c), the USD campus (including the 14 project sites) is not located within or adjacent to mapped 100-year floodplains or dam inundation zones. It should also be noted however, that the entire USD Campus, is with the Federal Aviation Administration (FAA) "Noticing Surfaces" areas for San Diego International Airport (SDIA), and portions of the campus (potentially including one or more of the 14 project sites) are within the FAA Noticing Surfaces areas for Montgomery Field. As a result, applicable development or redevelopment projects implemented under the Master Plan Update would be required to

coordinate with the FAA and submit the associated review documentation to the City prior to individual project approval. Depending on the results of this review, individual projects may be required to implement appropriate measures to maintain compatibility with airport operations and ensure that potential hazards are avoided (e.g., through efforts such as applicable limitations to structure heights or light and glare generation). Based on mandatory compliance with FAA regulatory criteria as described, potential impacts from aircraft-related hazards associated with implementation of the Master Plan Update would be less than significant.

The USD campus (including most or all of the 14 project sites) is designated “Very High Fire Hazard Severity Zone;” as such, all applicable facility design would adhere to associated fire code and brush management requirements, including the Brush Management Requirements contained within the San Diego Municipal Code Section 142.0412, specifically Zone 1 and Zone 2 requirements. Although several of the new projects are proposed along the northern edge of campus near Tecolote Canyon, only two projects (i.e., Project Site Nos. 20 and 27) would interface directly with the canyon. Both projects would involve the redevelopment of existing buildings. Demolition and reconstruction of the structures using modern building standards integrated with alternative compliance measures, such as the installation of sprinkler systems and upgraded/enhanced window and door opening protection, would ensure that the urban interface of the campus improves the current wildfire hazard on campus.

Due to the nature and location of the 14 project sites, no significant hazards related to disease-carrying vectors, sewage spills, EMF effects, or fuel/toxic chemical storage sites would result from implementation of the Master Plan Update. Specifically, none of the project sites would include, or be located in proximity to: (1) sewage treatment, animal-related operations or other sites/facilities that would potentially generate disease-carrying vectors or sewage spills (with all proposed wastewater facilities to be designed and operated in conformance with applicable codes and standards); (2) large-scale electrical transmission or communication facilities that could potentially generate EMF effects; or (3) fuel or toxic chemical storage sites (i.e., based on the previously described review of Cortese List databases).

Based on the above analyses, potential impacts related to health and safety concerns from implementation of the Master Plan Update would be less than significant.

7.1.5 Mineral Resources

The City Significance Determination Thresholds (2011) indicate that impacts to mineral resources are considered potentially significant in areas designated as Mineral Resource Zone (MRZ) 2 by California Geologic Survey (CGS; 1996). MRZ 2 areas occur where adequate information indicates that significant mineral deposits are present. Based on mapping provided in the referenced California Geological Survey (CGS) evaluation and the City General Plan Final Program EIR (2008c), the entire USD campus (including the 14 project sites) is located outside of areas designated as MRZ 2. As a result, no significant impacts to mineral resources would result from implementation of the Project.

7.1.6 Noise

Noise impacts were addressed in the Master Plan Update's Acoustical Analysis Report (HELIX 2016a, refer to Appendix M. The City Significance Determination Thresholds (2011) indicate that impacts to noise are considered potentially significant if a project would: (1) expose people to noise levels that exceed the City's adopted construction noise ordinance (75 dBA at the affected property line between the hours of 7 a.m. to 7 p.m.); (2) result in exposure of people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table NE-3 Land Use - Noise Compatibility Guidelines; or (3) result in a 3 dBA increase.

None of the project sites proposed by the Master Plan Update would be exposed to noise levels that exceed applicable City General Plan Noise Element standards. Due to future traffic noise produced by Linda Vista Road, which includes Project-generated traffic, the potential exists for noise levels at Project Site No. 23 (Student Housing/ Parking Structure) to exceed the City's 45 Community Noise Equivalent Level (CNEL) interior noise threshold. As part of the City's building permit requirements, the final design for Project Site No. 23 would be required to demonstrate that interior noise levels would not exceed the 45 dBA L_{EQ} interior noise limit required by the City.

Stationary noise sources from the project sites would include heating, ventilation, and air conditioning (HVAC) units. The loudest modeled noise level at a nearby noise-sensitive land use (NSLUs) from these units would be 30 dBA L_{EQ} , which would be below the City's 40 A-weighted decibel (dBA) L_{EQ} single-family residential nighttime noise limit. Therefore, the HVAC units would not result in a significant permanent increase in existing noise levels and impacts from stationary noise sources would be less than significant.

Traffic noise generated by the Master Plan Update would not cause direct significant impacts to off-site NSLUs. The cumulative Year 2035 traffic generated by the increase in student enrollment in the cumulative study area (refer to Table 6-1), as well as regional growth, would increase noise above the 65 CNEL threshold in the General Plan on two roadway segments in the Project area (i.e., Colusa Street and Via Las Cumbres, between Friars Road and Linda Vista Road) (refer to Table 8 in Appendix M). However, the Master Plan Update's addition to local traffic noise would not be cumulatively considerable because the Project would not contribute more than 3 dBA to the cumulative increase in traffic noise off-site and impacts would be less than significant.

On-campus construction noise impacts would be addressed through USD's compliance with the City Noise Ordinance and implementation of construction best management practices, including notification to building occupants of potential construction noise, internal coordination, and restrictions on construction scheduling. Less than significant construction noise impacts to on-campus uses would occur.

Construction of the Master Plan Update, including demolition and grading, would not cause significant noise impacts to off-campus human receptor NSLUs due to the campus' compliance with the City Noise Ordinance. However, construction noise may exceed the 60 dBA L_{EQ} threshold for sensitive habitat in the MHPA along the northern edge of campus and Tecolote Canyon Natural Park. Mitigation for these impacts is described in Section 5.3, *Biological Resources*.

As described in the Acoustical Analysis, vibration impacts from the potential use of a vibratory roller during construction would not cause significant impacts to on-campus or off-campus vibration sensitive land uses. None of the proposed University uses would produce new sources of vibration.

Although the campus is within the Airport Influence Area (AIAs) for the SDIA and Montgomery Field, they would not be located within the 60 CNEL noise contours for either airport, and impacts from airport noise would be less than significant.

Based on the above analyses, potential impacts related to noise from implementation of the Master Plan Update would be less than significant.

7.1.7 Population and Housing

The City Significance Determination Thresholds (2011) state that a significant impact associated with population and housing growth may result from a project if it induces substantial population growth in an area; substantially alters the planned location, distribution, density or growth rate of the population of an area; or includes extensions of roads or other infrastructure not assumed in the community plan (e.g., the Linda Vista Community Plan). If the answer to any of these questions is yes, it must be determined whether the associated direct or indirect population growth would result in physical impacts to the environment.

Development under the Master Plan Update would consist of new academic, student support, administrative, athletic and recreational facilities, and on-campus student housing that was not contemplated in the 1996 Master Plan FEIR. Implementation of the Master Plan Update could create an undetermined number of new employment opportunities consisting of additional faculty and staff positions. It is anticipated that the majority of the new faculty and staff positions would be filled by persons already residing in the region and, thus, would not create a measurable new demand for additional off-campus housing. Some faculty and staff positions may be filled by individuals currently residing outside of the region but who would relocate to San Diego, and they would be expected to seek housing in nearby communities. No significant pressure on local housing supply and no substantial alterations to the local population is expected to result from implementation of the Master Plan Update, however, as the number of employment positions that may be filled by employees currently living outside the region likely would be relatively low. Furthermore, those positions likely would be filled over a period of several years as the campus enrollment would expand over time and new campus projects would be constructed gradually over a period of 15 to 20 years.

As discussed above, the existing student campus population is approximately 7,000 FTE. Implementation of the Master Plan Update would construct new campus facilities and renovate existing structures to accommodate a total of 10,000 FTE, including 1,000 new on-campus student beds. Thus, implementation of the Master Plan Update would allow the campus to accommodate an anticipated enrollment increase of approximately 3,000 FTE over the next 15 to 20 years. Several of the new facilities under the Master Plan Update would involve construction of on-campus student housing facilities to support USD's goal of bringing more students to live at the University, including all first- and second-year students. Accordingly, not all of the additional FTE would seek off-campus housing. Rather, many would be housed on campus in existing or proposed student housing facilities, while some would be expected to already reside in the region (e.g., transfer students). Even

with the additional student enrollment of 3,000 FTE—which would not induce substantial population growth in the area because many of the students would come from the San Diego region or live on campus for the duration of their time enrolled at USD. Construction of additional housing on campus would help relieve pressure on local housing supplies in the surrounding communities, rather than adding to housing pressures within the region. The USD campus is located in a developed area currently served by existing utilities, infrastructure, and public services that would accommodate campus development over the next 20 years. Further, no new public roadway segments or extensions of other public infrastructure would be required to implement the Master Plan Update or would be constructed under the Project. Minor improvements and modifications to several existing off-site intersections (generally along Linda Vista Road), are proposed as part of the Master Plan Update (see Section 3.2.1 for more detailed descriptions). These improvements would occur at existing roadways that already provide access to the campus and would bring these areas up to current City standards. The improvements and modifications would not add capacity to the roadways or otherwise induce population growth. Based on the foregoing, implementation of the Master Plan Update would not directly or indirectly induce substantial population growth that would result in physical impacts to the environment.

7.1.8 Public Services and Facilities

The City Significance Determination Thresholds (2011) state that a significant impact associated with public services and facilities may result from a project if it would have an effect upon, or result in the need for new or altered governmental services related to police protection; fire/life safety protection; libraries; parks or other recreational facilities; maintenance of public facilities, including roads; or schools. The significance of a project's impacts should be evaluated relative to construction of public service facilities, particularly whether the project would conflict with the community plan in terms of number, size and location of public service facilities, as well as if direct impacts from construction of new facilities needed to serve the project would occur.

Police Protection

Police protection within the University is provided by the Western Division of the San Diego Police Department (SDPD), located at 5215 Gaines Street. Western Division is currently staffed with 110 sworn personnel and two civilian employees. Using the SDPD's recommended staffing guidelines, the Western Division currently deploys a minimum of 15 patrol officers on First Watch, 18 patrol officers on Second Watch, and 11 patrol officers on Third Watch. Overall, the SDPD is currently staffing 1.34 sworn officers per 1,000 residents based on 2015 estimate residential population of 1,311,882. The goal citywide is to maintain 1.48 officers per 1,000 population ratio.

The SDPD currently utilizes a five level priority calls dispatch system, which includes priority E (Emergency), one, two, three, and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority "E" and priority one calls involve serious crimes in progress or those with a potential for injury. Priority two calls include vandalism, disturbances and property crimes. Priority three includes calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or requests for lost or found property reports.

The SDPD's citywide response time goals are 7 minutes for emergency calls, 14 minutes for priority one calls, 27 minutes for priority two calls, 68 minutes for priority three calls and 70 minutes for priority four calls. The 2015 average response times for Beat 622 were 6.1 minutes for emergency calls, 12.8 minutes for priority one calls, 30.7 minutes for priority two calls, 72 minutes for priority three calls and 166.3 minutes for priority four calls. The citywide average response times for 2015 were 7 minutes for emergency calls, 14.3 minutes for priority one calls, 35 minutes for priority two calls, 87.1 minutes for priority three calls and 119.4 minutes for priority four calls. The SDPD strives to maintain the response time goals as one of various other measures used to assess the level of service to the community.

Implementation of the Master Plan Update would construct new facilities and renovate existing buildings in order to accommodate an additional 3,000 FTE students over the next 20 years. This increase in student population may create a demand for additional police services and personnel. There are no current plans for additional police sub-stations in the immediate area. Police response times in the Linda Vista community are anticipated to continue to increase with the build out of community plans and the increase of traffic generated by new growth. The SDPD would incrementally augment police services and personnel, as needed, during implementation of the Master Plan Update over the next 20 years to ensure that adequate police response times are achieved. Additionally, a Crime Prevention through Environmental Design (CPTED) review would be conducted to address general security concerns on campus. Therefore, impacts to police services would be less than significant.

Fire/Life Safety Protection

The Project site is located within the San Diego Fire-Rescue Department (SDFD) service area for fire protection and emergency medical services. The City has 47 fire stations protecting more than 330 square miles and over 1.3 million residents. The SDFD uses the Citygate Report (2010) to address the deployment of fire resources within their jurisdiction. The SDFD primarily serves the USD campus from Fire Station 23 located at Linda Vista Road and Comstock Street. This station was built and staffed in with four-person engine in 1943; no other SDFD resources have since been added to the Linda Vista community. Station 25, located at 1972 Chicago Street, also serves the USD campus. In 2015, there were 30 responses by Engine 23 to the USD campus. The 90 percentile response time for these 30 incidents was 8 minutes 53 seconds. The SDFD response time goal is 7 minutes and 30 seconds; 90 percent of the time, as indicated in the Citygate Study (2010). The Citygate Study also identified West Mission Valley (Friars Road) as a service gap area and in need of a fire station to address long response times in the Linda Vista, Mission Valley, and Old Town communities. The Mission Valley West Fire Station is in the City's Mission Valley Public Facilities Financing Plan (PFFP) with funding to be split among the three communities it will serve.

Over a 20-year period, implementation of the Project would lead to an increase in USD's student population (by up to 3,000 FTE), additional buildings would be constructed on campus, and approximately 1,000 additional on-campus student housing beds would be added. New campus development would adhere to applicable sections of the state fire code, which requires incorporation of automatic sprinkler systems and fire lanes to provide adequate access by fire department personnel. Nonetheless, the Project would increase demand for emergency services over time. This increase in demand would require Engine 23 to respond more often to the USD campus and thus be unavailable to provide emergency services to other citizens in need. This increase in call volume would further reduce SDFD's ability to meet its response time goal. The

increase in demand attributable to the Project, itself, would not trigger the need for a new fire station. USD would be required by the City to pay development impact fees, as a condition of approval, to address the capital costs of increasing facilities for Fire-Rescue Services. Therefore, Project impacts to SDFD services in the City would be less than significant.

Libraries

Implementation of the Master Plan Update would not increase the demand for off-campus libraries. Many of the additional approximately 3,000 FTE students, as well as new faculty and staff, anticipated to reside on campus or in the area within the next 15 to 20 years would come from the San Diego region or only be temporary residents. These students, faculty and staff are anticipated to primarily use on-campus library facilities, and would result in a minimal increase in the use of either use existing off-campus libraries. Furthermore, the Project would be required to pay applicable impact fees prior to the issuance of Building Permits. Therefore, no new or altered off-campus library facilities are anticipated to be required and impacts to libraries in the vicinity of the campus would be less than significant.

Parks or Other Recreational Facilities

Implementation of the Master Plan Update would not increase the demand for off-campus public parks. The Master Plan Update would accommodate anticipated campus growth of approximately 3,000 FTE over the next 15 to 20 years. As discussed in Section 7.1.8, this increase in campus population and associated increase in faculty and staff would primarily consist of those who already reside in the general area or region. It is anticipated that the future campus population would utilize parks near their residences and thus, no new or altered park facilities would be required. Furthermore, the Project would be required to pay applicable impact fees prior to the issuance of Building Permits. Therefore, no impacts to parks or other recreational facilities in the vicinity of the campus would occur.

Maintenance of Public Facilities

No new public roadway segments or extensions of other public infrastructure would be required to implement the Master Plan Update. Therefore, no impacts related to the maintenance of public facilities or infrastructure would occur.

Schools

Implementation of the Master Plan Update would not substantially affect public school facilities within the campus vicinity. Any demand for K – 12 public education facilities generated by implementation of the Master Plan Update would be associated with the anticipated population increase, including faculty, staff and students with children who relocate to the area. As discussed in Section 7.1.8, it is anticipated that the majority of additional faculty and staff positions would likely be filled by persons already residing in the region. Many of the students would come from the San Diego region or only be temporary residents. Thus, those with school age children would likely already be enrolled at existing public schools near their residences and would not create a demand for new or altered school facilities in the campus vicinity. Therefore, impacts to schools would be less than significant.

7.2 Subject Areas Requiring No Change in the Prior Analysis

7.2.1 Paleontological Resources

The analysis of impacts to paleontological resources presented herein was included in the 1996 Master Plan FEIR and is incorporated by reference. The USD campus is underlain by geologic deposits with a low to high fossil-bearing potential (i.e., paleontological resource sensitivity), including the Scripps Friars, Lindavista, and Bay Point formations. Records indicate that fossils have been collected from these formations within Tecolote Canyon near the campus, and the Linda Vista Community Plan further confirms several major paleontological resource finds in Tecolote Canyon (City 1996). Accordingly, the 1996 Master Plan FEIR concluded that the actions associated with Master Plan implementation could result in significant impacts to paleontological resources, specifically due to excavation that would take place on geologic units having a medium to high potential to produce paleontological resources (i.e., the Scripps, Friars, Lindavista and Bay Point formations). However, these potentially significant impacts were considered mitigable in the 1996 Master Plan FEIR. Mitigation included monitoring by a qualified paleontologist both before and during construction, including during all cutting, excavating, and earth-moving activities, as well as salvaging and preparing for deposit (at a scientific institution that houses paleontological collections) any fossils or materials discovered during monitoring, and preparing and submitting monitoring results report to the City.

Because some of the 14 project sites in the Master Plan Update are underlain by these same formations and could require similar levels of excavation, the same potentially significant impacts to paleontological resources identified in the prior EIR could occur. However, no new significant impacts are identified nor would the impacts be more severe than those identified in the prior EIR. The University would be required to implement the paleontological resources mitigation, as required in the 1996 Master Plan FEIR, to any new projects that would have the potential to exceed the City's Significance Determination Thresholds (2011) for paleontological resources. The thresholds indicate that a project that requires over 1,000 cubic yards of excavation in a high resource potential geologic unit or over 2,000 cubic yards of excavation in a geologic deposit of moderate resource potential would have the potential for a significant impact. As such, the prior impacts disclosed in the 1996 Master Plan FEIR would not be exacerbated by the implementation of the Master Plan Update, and they are not considered to be new significant impacts. The following standard paleontological resources mitigation would be required:

Paleo-1: Moderate to High Sensitivity Formations

The following mitigation measures contain project conditions that have been developed by the City to reduce potential paleontological impacts to below a level of significance. These requirements comprise a comprehensive program to address potential impacts to moderate to high-sensitivity paleontological resources associated with the Scripps, Linda Vista and Bay Point Formations, and are consistent with standard programs employed at other sites in the City. Implementation of these mitigation measures would allow preservation and future scientific study of any important paleontological resources encountered, thereby reducing impacts to below a level of significance.

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored - Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known soil conditions (native or formation).
3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**
2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.
 2. The following procedures shall be followed.
 - a. No Discoveries - In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSV and submit to MMC via fax by 8 AM on the next business day.
 - b. Discoveries - All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.

- c. Potentially Significant Discoveries - If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

 - 1. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 2. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 3. MMC shall provide written verification to the PI of the approved report.
 - 4. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

7.3 Growth Inducement

7.3.1 Introduction

In accordance with Section 15126(d) of the State CEQA Guidelines, an EIR must include an analysis of the potential growth-inducing impacts of the project. The growth inducement analysis must address: (1) the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment; and (2) the potential for the project to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. This second issue involves the potential for the project to induce further growth by the expansion or extension of existing services, utilities, or infrastructure. The State CEQA Guidelines Section 15126.2(d) further state that “[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

7.3.2 Short-term Effects

During construction of individual projects, demand for various construction trade skills and labor would increase. It is anticipated that this demand would be met predominantly by the local labor

force, and would not require importation of a substantial number of workers or cause an increased demand for temporary or permanent local housing. Accordingly, no associated substantial short-term growth-inducing effects would result.

7.3.3 Long-term Effects

The Project would contribute to the long-term growth identified in the General Plan EIR and Linda Vista Community Plan EIR, through the continued development of campus-related uses and planned increase in student population to up to 10,000 FTE. Implementation of the Master Plan Update would be a continuation of the institutional uses that have existed on the campus since the original CUP was issued in 1960. The increase in academic/administrative space, as well as the student enrollment, would also incrementally increase the amount of faculty and staff present on the campus each day. The growth associated with the Master Plan Update would occur gradually over a period of 15 to 20 years. As stated above, however, even with the additional student population of 3,000 FTE—which would not induce substantial population growth in the area because many of the students would come from the San Diego region or only be temporary residents—the construction of additional housing on campus would relieve pressure on local housing supplies in the surrounding communities, rather than adding to housing pressures within the region.

Another important factor in assessing the potential for growth inducement is the status of the surrounding lands. All of the lands surrounding the campus are already developed or contained in designated open space (i.e., Tecolote Canyon). No new public roadway segments or extensions of other public infrastructure would be required to implement the Master Plan Update. Improvements in the capacity of sewer lines, as described in Section 5.7, Public Utilities, would not induce additional growth as the lines would be sized in accordance with the existing needs of the Linda Vista community. Thus, surrounding properties would not be pressured to increase existing densities due to either job opportunities or the increase in student enrollment proposed for the campus.

7.4 Significant Environmental Effects Which Cannot Be Avoided If The Project Is Implemented

Implementation of the Master Plan Update, including the increase in student enrollment over time, would result in direct and cumulatively significant traffic impacts in the vicinity of campus. Specifically, impacts to the Linda Vista Road/Napa intersection and the segment of Linda Vista Road between Napa Street and Marian Way [Mildred Street] cannot be mitigated since the area is currently undergoing planning studies as part of the Morena Corridor Specific Plan. However, because planning for mobility and circulation improvements is still in the preliminary stages, multiple improvement options at the noted intersection and street segment are under consideration by the City and none of the potential options are definitive at this time (nor is the funding for any improvements assured). As part of the mitigation identified, the campus would contribute toward its “fair share” of the cost of future improvements (as described in Section 5.2, *Transportation/Circulation*). That monetary contribution would partially mitigate the Master Plan Update’s direct and cumulative impacts to the affected intersection and roadway segment.

7.5 Significant Irreversible Environmental Changes

Section 15126(c) of the State CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should the project be implemented. Irreversible environmental changes typically fall into three categories: (1) primary impacts, such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources); (2) secondary impacts, such as road improvements which provide access to previously inaccessible areas; and (3) environmental accidents potentially associated with the project. Section 15126.2(c) of the State CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the Project would not result in significant irreversible impacts to agricultural and forestry lands or mineral resources. The Project site is currently used as a four-year university and, therefore, contains no agricultural or forestry resources. No prime farmland or farmland of statewide importance occurs on or adjacent to the campus and the campus is not located within a designated mineral recovery zone. In addition, no water bodies are located on the Project site or within the Project vicinity that would be impacted by the Project.

The Project would entail the commitment of energy and non-renewable resources, such as energy in the form of electricity, energy derived from fossil fuels, natural gas, construction materials (i.e., concrete, asphalt, sand and gravel, petrochemicals, steel, and lumber and forest products), potable water, and labor during the construction phases. The Project features a number of sustainability elements to minimize its consumption of energy and non-renewable resources, as described above under Section 7.1.2, *Energy*, and in Section 3.0, *Project Description*, and associated impacts would be less than significant. Use of these resources on any level would nevertheless have an incremental effect on the regional consumption of these commodities, and result in long-term, irretrievable losses of non-renewable resources, such as fuel and energy.

The majority of new construction would occur on developed portions of campus and only 0.5 acre of sensitive biological resources would be removed as a result of Project grading and planned improvements. Although irreversible, these impacts would be mitigated by measures outlined in Section 5.3, *Biological Resources*.

There is the potential for historic structures or sites to occur on the USD campus. Several of the projects would include demolitions or modifications to existing structures. Mitigation outlined in Section 5.4, *Historic Resources*, would ensure that any modification or removal of a potentially historic structure or site is properly addressed and treated at the time building construction is proposed. Although there are known archaeological resources in the Project study area, Project impacts are not considered significant because no construction would occur within recorded sites. Construction identified in the Master Plan Update has the potential to disturb unknown archaeological deposits. Such impacts to archaeological resources would not be reversible. However, impacts would be mitigated to below a level of significance as described in Section 5.4, and recovery of resources would occur during the construction monitoring process.

Paleontological resources which could be disturbed would be salvaged, as necessary, and data recovered in accordance with mitigation in the 1996 Master Plan FEIR, as described above in Section 7.2.1, *Paleontological Resources*. Impacts to paleontological resources would not be a reversible change to the resource.

The Project would not involve any kind of road or highway improvements that would provide access to previously inaccessible areas. Further, no major environmental accidents or hazards are anticipated to occur as a result of Project implementation, as discussed in Section 7.1.4, *Health and Safety*.

8.0 ALTERNATIVES

8.1 Introduction

Section 15126.6(a) of the State California Environmental Quality Act (CEQA) Guidelines requires that Environmental Impact Reports (EIRs) describe "...a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Section 15126.6(f) of the CEQA Guidelines further states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative. Those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated). The following three alternatives are evaluated in this analysis:

- No Project/No Development Alternative;
- No Project/Existing Master Plan Alternative; and
- Environmentally Sensitive Lands (ESL) Avoidance Alternative.

Each of these alternatives was selected to avoid or minimize significant impacts associated with implementing the Master Plan Update as analyzed in this Subsequent Environmental Impact Report (SEIR). Specifically, the following rationale was considered when developing this range of alternatives:

- The No Project/No Development Alternative would retain the current on-site uses with no new development/disturbance associated with the entitled 1996 Master Plan or the Master Plan Update, thereby avoiding both construction-period and long-term impacts associated with implementation of the Project.
- The No Project/Existing Master Plan Alternative represents the 1996 USD Master Plan that encompasses the 16 previously approved projects (refer to Figure 1-1 in this report) and a student enrollment of 7,000 full-time equivalent (FTE), and would avoid impacts associated with the current Master Plan Update.
- The ESL Avoidance Alternative would avoid or reduce impacts to sensitive biological resources and steep slopes that are regulated by San Diego Municipal Code (SDMC) Chapter 14, Article 3, Division 1.

The State CEQA Guidelines require feasible alternatives that would reduce and/or eliminate significant impacts associated with the project. The impacts associated with these alternatives are compared to those identified for the project in the following analysis. The alternatives are assessed relative to their ability to meet the basic objectives of the project (with an overview of project and

alternative impacts provided in Table 8-2, *Comparison of Project and Alternative Impacts*) located at the end of this section.

8.2 Summary of Project Objectives and Significant Impacts

8.2.1 Project Objectives

The Master Plan Update would serve as an updated framework for guiding the physical development of the University of San Diego (USD) campus over the next 20 years, further achieving the academic goals and objectives of the campus outlined in the 1996 Master Plan. Many of the goals and objectives identified in the 1996 Master Plan FEIR are still relevant and applicable to the project. Specifically, these include efforts related to developing new and renovated facilities and capital improvements; renovating or replacing buildings to improve degraded conditions; siting new buildings in locations that offer programmatic advantages; siting facilities to enhance spatial usage of the campus; designing facilities to be compatible with the established style and scale of existing campus structures; improving pedestrian access to, from, and within campus; incorporating accessibility features into existing and new buildings; and providing additional on-campus housing and proximate parking. Several additional or updated project objectives have also been identified by USD as part of the Master Plan Update planning process, including efforts to:

- Prioritize the campus mesa for the highest and best use of campus land, especially the academic core, wherein all traditional degree programs will be focused into instructional spaces;
- Ensure adequate space is available for projected academic growth and for an on-campus population up to 10,000 full-time equivalent (FTE);
- Allow the campus to expand internally without altering its physical boundary by infilling surface parking lots and underutilized or vacant campus lands, thereby reducing the need to acquire additional property and reducing potential conflicts with neighbors;
- Guide the intensification of the campus as it grows in a way that does not significantly alter the campus character, but contributes to its enhancement and quality;
- Integrate administrative, academic, housing, athletic, and recreational uses into a cohesive physical campus and campus experience;
- Update the living and learning environment to better reflect campus residential life and academic goals;
- Enhance the student experience, elevate academic excellence on campus, and continue to distinguish USD as a place for education, scholarship, and service;
- Enhance mobility and access throughout the campus and expand mobility options on campus;

- Develop a framework and design guidelines for building and landscape improvements;
- Identify campus development opportunities that balance the university's mission and its financial sustainability; and
- Guide the creation of an aesthetically pleasing, well-functioning university campus that is integrated within, contributes positively to, and respects the surrounding community.

8.2.2 Significant Impacts of the Proposed Project

Based on the evaluations in Section 5.0, *Environmental Analysis*, the project was determined to result in significant or potentially significant impacts related to the environmental resources areas discussed below.

Land Use

The project is consistent with applicable policies of the General Plan, Community Plan and other policy documents. In addition, the Project is consistent with the MSCP Subarea Plan, including its Land Use Adjacency Guidelines and Framework Management Plan. Therefore, no significant land use impacts are identified for the Project.

Transportation/Circulation

Significant, direct impacts in the near-term (with the project) would occur along Linda Vista Road and its intersections with Napa Street, Colusa Street and the Alcalá Vista Apartments entrance. A significant direct roadway segment impact would occur along Linda Vista Road between Napa Street and Marian Way/Mildred Street. As indicated in Section 5.2, *Transportation/Circulation*, mitigation would be required to avoid impacts to three intersections; however, the Napa Street intersection and the Linda Vista Road street segment are located within the Morena Corridor Specific Plan area, which will likely experience substantial mobility related improvements in the coming years. However, multiple improvement options at this intersection are under consideration by the City because planning for improvements is still in the preliminary stages. As a result, none of the potential options is definitive in terms of scope and timing at this time, nor is the funding for any improvement assured. Mitigation (direct improvements or fair share funding) is required to partially mitigate the project's direct significant impacts to the affected intersections and roadway segment, although these impacts would remain significant and unmitigated because the scope of the improvement is undefined, balance of the cost for the preliminary improvement is unfunded, the timing of the improvement is unknown, and the improvement is not assured at this time.

Under cumulative conditions (Year 2035 and beyond), significant impacts would occur at the prior three named intersections, and the segments of Friars Road between Avenida de las Tiendas and Avenida del Rio and between Avenida del Rio and the SR-163 southbound ramps. Implementation of mitigation for direct impacts would also mitigate cumulative impacts at Linda Vista Road and the Colusa Street and Alcalá Vista Apartments Entrance intersections. The identified cumulative impact to the Linda Vista Road/Napa Street intersection would remain cumulatively significant and unmitigated for the same reasons described above for near-term impacts. Cumulative impacts to the segments of Friars Road between Avenida de las Tiendas and the SR-163 southbound ramps would also remain cumulatively significant and unmitigated, since there is no feasible mitigation or

improvement projects towards which the project can contribute a fair share payment in order to reduce impacts to less than significant levels.

Biological Resources

Significant impacts to biological resources identified for the Project include: (1) direct impacts to the sensitive Diegan coastal sage scrub habitat outside the MHPA; and (2) potential indirect impacts to Cooper's hawks in the MHPA during construction. Mitigation required through the City Multiple Species Conservation Plan (MSCP) Subarea Plan and Biology Guidelines, as outlined in Section 5.3, *Biological Resources*, would reduce the project's direct and indirect impacts to sensitive vegetation communities and sensitive wildlife species to below a level of significance. The project design would also comply with the City Land Use Adjacency Guidelines as described above under Land Use, in order to avoid or minimize potential indirect impacts to the MHPA related to grading/development, drainage, toxics, lighting, public access (barriers), invasives, brush management, and noise.

Historical Resources

Archaeological Resources

While no significant impacts to known archaeological resources were identified for the project, it is possible that unknown resources are present within focused areas of the project, given the cultural sensitivity of the general area, the poor ground visibility during surveys, and the request for Native American monitoring. As a result, the potential for direct impacts to presently unknown archaeological resources were assessed. All of the identified potentially significant direct impacts to archaeological resources would be avoided or reduced below a level of significance through the measure identified in Section 5.4, *Historical Resources*.

Built Environment

A number of buildings on site are over or would become 45 years of age or more during the buildout of the Master Plan Update, and are potentially historic (with site-specific analyses to occur as individual projects are refined and analyzed). All of the identified potentially significant direct impacts to historical resources would be avoided or reduced below a level of significance through the measure identified in Section 5.4, *Historical Resources*.

Air Quality

Due to the potential for individual Master Plan Update projects to include new sources of toxic air contaminants (TACs) (e.g., combustion facilities and laboratories), implementation of the project would result in potentially significant direct impacts related to TAC emissions. With implementation of mitigation requiring completion of a Health Risk Assessment and issuance of building permits to only those projects showing emissions below stated standards, potential stationary source impacts would be less than significant.

Project construction emissions of NO_x, VOCs, PM₁₀, and PM_{2.5} would be below significance levels. However, short-term cumulative impacts related to air quality could occur if construction of the Project and other projects in the surrounding area were to occur simultaneously. Because the Master Plan as analyzed in 1996 has not been fully built out and 16 entitled projects remain unbuilt,

any added projects would only exacerbate the cumulative effect of construction-period impacts. As such, the Project would incrementally add to those construction period emissions and contribute to the cumulatively significant and unavoidable impacts disclosed in the previous EIR.

Public Utilities

Implementation of the Master Plan Update would result in potentially significant direct impacts to wastewater infrastructure. Specifically, development of Project Site Nos. 22, 23, 25 and 26, located within the Linda Vista Road sewer basin, may increase the amount of sewer flow within the basin and contribute to the reduced functioning of reaches 10 through 13. Potentially significant direct impacts to public utilities would be reduced below a level of significance through the measure identified in Section 5.7, *Public Utilities*.

Visual Effects and Neighborhood Character

Implementation of the Master Plan Update would result in potentially significant direct impacts to existing landform features on campus. Specifically, these potential impacts would be associated with encroachment into steep slopes protected by ESL Regulations and the creation of manufactured slopes exceeding 10 feet in height. Although conformance with the applicable regulatory standards (e.g., ESL Regulations) would reduce most landform alteration impacts below a level of significance, specific grading plans are not currently available and the analysis cannot demonstrate with certainty that all projects would achieve the associated standards in the City Significance Determination Thresholds. As part of the evaluation of specific grading plans, mitigation/design features would be incorporated to reduce these impacts to less than significant levels, as described in Section 5.8, *Visual Effects and Neighborhood Character*.

8.3 Alternatives Considered But Rejected

Since the primary purpose of an alternatives discussion is to consider whether there are alternatives to the project that would avoid or substantially lessen any of the significant effects of the project, this section evaluates each of the project alternatives relative to the above topics.

State CEQA Guideline 15126.6(c) requires that an EIR identify alternatives that were considered and rejected as ~~infeasible~~ not potentially feasible, and briefly explain the reasons for their rejection. Alternatives considered but rejected from further study for the project include the Traffic Impact Avoidance Alternative and the Reduced Enrollment Alternative, as outlined below.

8.3.1 Traffic Impact Avoidance Alternative

The project would increase the current USD student enrollment by 3,000 to 10,000 FTE. Significant and unmitigated direct and cumulative traffic impacts were identified for the project based on intersection impacts at Napa Street and Linda Vista Road, as well as a segment impact on Linda Vista Road between Napa Street and Marian Way. As a result, an alternative was considered that would reduce proposed student enrollment, resulting in associated reductions in additional traffic (with a focus on eliminating near-term significant and unmitigated impacts of the project). Under the Traffic Impact Avoidance Alternative, the campus would be limited to fewer than 7,350 students or FTE based on the sensitivity analysis conducted by LLG in the project Transportation Impact Analysis

(TIA; refer to Table 12-4 in Appendix C). Instead of producing 9,300 average daily traffic (ADT), this alternative would result in 1,190 ADT (or a 73 percent reduction in campus trips). At 7,350 FTE, the campus would avoid significant and unmitigated direct impacts to the Linda Vista Road/Napa Street intersection, as well as along the segment of Linda Vista Road. Direct impacts to the Linda Vista Road/Alcalá Vista Apartments Entrance would also be avoided since those impacts would be triggered by a student population of 7,500 FTE; the significant impact at the Linda Vista Road/Colusa Street intersection would not be avoided or reduced substantially by this alternative because it would be triggered by a 50 FTE increase.

The Traffic Impact Avoidance Alternative would also reduce traffic-related noise and air quality (operational) emissions because substantially less vehicles would access the campus on a daily basis, as compared to the proposed project. Traffic-related noise and air quality impacts would be less than significant for both the project and Traffic Impact Avoidance Alternative, so this alternative would not avoid another traffic-related significant impact.

This alternative was rejected as not potentially feasible for its inability to achieve the project objectives related to ensuring adequate space is available for projected academic growth, updating the living and learning environment, and for the following more detailed reasons:

1. An increase of 350 new students would not provide the University the capacity it needs to meet its enrollment projections over the next 20 years.
2. From a facilities standpoint, a substantially reduced enrollment would restrict the campus' ability to:
 - a. replace and expand classrooms, labs, and office space to serve existing and projected populations;
 - b. upgrade academic spaces which are currently overcrowded or housed in temporary or antiquated facilities;
 - c. provide specialized spaces such as teaching and research labs, computer labs, and seminar rooms outside of the traditional classroom environment that are responsive to the changing academic learning environment;
 - d. attract and retain students and faculty by offering both expanded academic course offerings, as well as extensive open space, high-quality housing, sports, recreation, and cultural facilities;
 - e. upgrade the passive and active recreation facilities and opportunities offered on campus, which currently compete with Intercollegiate athletics for space; and
 - f. expand and update the current housing supply and environment to the specific needs of the first and second year experience by providing ample spaces, enhanced amenities and more support services for students living on campus.

Because this alternative would limit additional future student enrollment to approximately 350 FTE, the campus would not feasibly attain most or all of the basic project objectives described in Section 8.2.1; thus, a Traffic Impact Avoidance Alternative is not carried forward for a full analysis.

8.3.2 Reduced Project Alternative

The Reduced Project Alternative would reduce the scale of campus development to a level that would only accommodate an increase of 1,500 FTE over the existing USD student population of approximately 7,000 FTE for a total of 8,500 FTE. This represents a 50 percent reduction from the proposed increase in enrollment levels of 3,000 FTE identified in the Master Plan Update. This alternative would substantially lessen the significant impacts of the project, in particular the traffic impacts which are driven by student enrollment.

Instead of producing 9,300 ADT, this alternative would result in 4,650 ADT (or a 50 percent reduction in long-term campus trips from proposed levels) based on the trip generation rates in the TIA (Table 8-1, *Reduced Project Alternative Trip Generation*). At 8,500 FTE, the campus would not avoid significant and unmitigated direct impacts to the Linda Vista Road/Napa Street intersection and the segment of Linda Vista Road as discussed below. Based on the sensitivity analysis conducted by LLG in the TIA, the student FTE increase would have to be reduced to 350 students to avoid these impacts (refer to Section 5.2, *Transportation/Circulation*, and the Traffic Impact Avoidance Alternative described above). Direct impacts to the Linda Vista Road/Alcalá Vista Apartments Entrance would also not be avoided since those impacts would be triggered by a student population of 7,500 FTE (as noted in Mitigation Measure Tra-4). Similarly, the significant impact at the Linda Vista Road/Colusa Street intersection would not be avoided or reduced substantially by this alternative because the intersection is projected to operate poorly without the project and impacts would be triggered by a 50 FTE increase (see Table 5.2-9 and Mitigation Measure Tra-3). The segment of Linda Vista Road is projected to operate poorly without the project, as well, and adding more than a 350 FTE increase would trigger impacts (see Table 5.2-10 and Mitigation Measure Tra-5). Because the scope, timing, and funding of circulation improvements within the Morena Corridor Specific Plan Area is unknown at this time, significant and unmitigated traffic impacts would still occur under this alternative.

Table 8-1 REDUCED PROJECT ALTERNATIVE TRIP GENERATION											
Land Use	Size	Daily Trip Ends (ADT)		AM Peak Hour				PM Peak Hour			
		Rate ^a	Volume	% of ADT	In : Out	Volume		% of ADT	In : Out	Volume	
					Split	In	Out		Split	In	Out
University (4 Years)	1,500 FTE	3.1/FTE	4,650	6%	90 : 10	251	28	8%	40 : 60	149	223

Source: LLG 2016b

^a Trip generation rate based on *Traffic Circulation and Parking Report for the Proposed USD Master Plan* EIR (KHA, April 1996), and adjusted to account for a higher percentage of students living on-campus under Long-Term conditions.

The reduced traffic volumes would lessen project-related impacts to noise and air quality caused by vehicles in and around the campus; however, since these impacts would not be significant under the project, this alternative would not avoid significant impacts with regard to these topics. A reduced enrollment would mean that the need for replacement and expanded facilities would be scaled back

which, in turn, would result in less new facilities construction on campus. As such, project impacts to the physical environment of the campus would be eased accordingly. However, direct and indirect impacts to biological resources would not be avoided since two of the four projects with impacts to sensitive habitats are needed to improve existing on-campus accessibility and circulation, such as the trail from Linda Vista Road (Project Site No. 17) and the pedestrian bridge over Marian Way (Project Site No. 19). Likewise, depending on the location of new construction, the potential would still exist for land use policy impacts related to consistency with the MSCP Subarea Plan's Land Use Adjacency Guidelines. Any new construction would still have the potential for significant impacts to historic resources, in particular archaeology, due to the potential for unknown buried resources. The potential for impacts to the historic structures would also exist as the campus would need to replace and expand existing facilities to accommodate the increased enrollment. Although a lower potential for impacts to existing landforms would occur due to less pressure to build on the periphery of campus, it is assumed that potentially significant landform alteration impacts could still occur under this alternative.

Similar to the Traffic Impact Avoidance Alternative, this Reduced Project Alternative was rejected as not potentially feasible for its inability to achieve the basic project objectives related to ensuring adequate space is available for projected academic growth, updating the living and learning environment, and the following more detailed reasons:

1. An increase of 1,500 new students would not provide the University the capacity it needs to meet its enrollment projections over the next 20 years.
2. A 50 percent reduction in proposed enrollment would limit the campus' ability to:
 - a. replace and expand classrooms, labs, and office space to serve existing and projected populations;
 - b. upgrade academic spaces which are currently overcrowded or housed in temporary or antiquated facilities;
 - c. provide specialized spaces such as teaching and research labs, computer labs, and seminar rooms outside of the traditional classroom environment that are responsive to the changing academic learning environment;
 - d. remain competitive among other institutions in attracting and retaining students and faculty by offering both expanded academic course offerings, as well as extensive open space, housing, sports, recreation, and cultural facilities;
 - e. upgrade the passive and active recreation facilities and opportunities offered on campus which currently compete with Intercollegiate athletics for space; and
 - f. expand the current housing supply and update its environment to the specific needs of the first and second year experience by providing ample spaces, enhanced amenities and more support services for students living on campus.

Because this alternative would limit additional future student enrollment to approximately 1,500 FTE and not avoid or substantially lessen any of the significant impacts associated with the project, nor

would the campus feasibly attain most or all of the basic project objectives described in Section 8.2.1, it is not carried forward for a full analysis.

8.3.3 Alternative Location

An alternative location is not considered a potentially feasible alternative to the proposed Project because the project is proposed on an existing private university campus that has been operating at its present location as an institution for higher education since 1949. Off-site alternatives were not evaluated in the 1996 FEIR on the existing Master Plan because the proposed plan was intended to meet the future needs of the existing campus. Similarly, expansion of the existing campus at an off-site location was not evaluated in this SEIR because the Master Plan Update is also proposed to expand facilities, make improvements and serve both the academic, administrative and support needs of the existing and future campus population. If new facilities were developed off campus there would be an impact on the region as students and faculty would have to travel off-campus to satellite structures, resulting in longer driving/commute distances and greater air emissions, among other impacts. In addition, an alternative location would not meet most of the basic project objectives, including: 1) develop new facilities on the existing campus, 2) allow the citing of new buildings that offer programmatic advantages, 3) enhance the spatial usage of the campus, 4) provide additional on-campus housing, 5) prioritize the campus mesa for the academic core, or 6) allow the campus to expand internally. For these reasons, an alternative location is not carried forward for a full analysis.

8.4 Proposed Project Alternatives

Section 15126.6(e) of the State CEQA Guidelines requires that a “no project” alternative shall be evaluated, along with the associated impacts. Two potential scenarios are identified for the no project alternative in this analysis, including: (1) the No Project/No Development Alternative, in which the proposed revisions to the 1996 Master Plan would not move forward and no new development would occur and the existing conditions at the campus (as of the date that the Notice of Preparation [NOP] was published) would continue over the long-term; and (2) the No Project/Existing Master Plan Alternative, in which it is assumed that development would occur in the foreseeable future based on the existing allowable uses (i.e., the 16 approved projects evaluated under the 1996 Master Plan), with the Master Plan modifications and development revisions identified under the currently proposed project not implemented. The two described no project alternatives are evaluated below, followed by analysis of the ESL Avoidance Alternative.

8.4.1 No Project/No Development Alternative

Description

The USD campus occupies approximately 180 acres devoted to university-related uses, and would remain in its current condition under the No Project/No Development Alternative. With the exception of the steep, north-facing slopes along the northern campus border and the slopes on the western end of campus near Marian Way, the majority of the campus is already developed and supports university facilities (buildings, parking lots, athletic fields, etc.) and associated landscaping. Under this alternative, no change would occur to the current student enrollment or university footprint, and all existing structures and related facilities would remain in their current condition.

Environmental Analysis

The anticipated environmental effects resulting from the No Project/No Development Alternative are described below relative to issues resulting in potentially significant impacts under the project (refer to Table 8-1).

Land Use

Under the No Project/No Development Alternative, significant land use impacts would not occur similar to the Project.

Transportation/Circulation

The direct and cumulative transportation/circulation impacts identified for the project would not occur under the No Project/No Development Plan Alternative, as no increase in student enrollment, or associated traffic generation, would result. Accordingly, this alternative would avoid all potential significant (mitigated and unmitigated) transportation/circulation impacts identified for the project, although increased traffic from other sources in the campus vicinity would be expected to exacerbate existing and future levels of congestion in the project area.

Biological Resources

This alternative would avoid the significant, direct and indirect (but mitigable) impacts to biological resources identified for the project, as no additional campus development would occur. Accordingly, no change from existing biological conditions is assumed to occur under the No Project/No Development Alternative.

Historical Resources

Archaeological Resources

Because the No Project/No Development Alternative would not result in any related grading, building demolition or additions, or other activities which could encounter unknown resources or impacts to resources, no associated significant impacts to archaeological resources would occur.

Built Environment

The No Project/No Development Alternative would not result in any related grading, building demolition or additions, or other activities which could encounter impacts to potentially historic resources. Additional construction affecting structures 45 years or older would not occur on the campus, so potential impacts to historic resources, specifically built environment, would be avoided under this alternative.

Based on these conditions, this alternative would avoid the potential significant (but mitigable) impacts to historical resources identified for the Project.

Air Quality

The No Project/No Development Alternative would not result in any new campus development, including future buildings which would be potential sources of TACs or any new contributions to cumulative construction emissions. As a result, this alternative would avoid the potential significant (but mitigable) impacts from TACS identified for the Project. Cumulatively significant and unavoidable impacts from construction emissions would still occur without the Project.

Public Utilities

Under this alternative, no Master Plan development would occur and the Project site would remain in its current state. As a result, this alternative would not place Project Site Nos. 22, 23, 25, and 26 within the Linda Vista sewer basin. Therefore, this alternative would not increase the amount of sewer flow within the basin and would not contribute to the reduced functioning of reaches 10 through 13. This alternative would avoid the potentially significant (but mitigable) wastewater infrastructure impacts associated with the Master Plan Update.

Visual Effects and Neighborhood Character

Under this alternative, no Master Plan Update development would occur and the project sites would remain in their current states. As a result, this alternative would avoid the potentially significant (but mitigable) landform alteration impacts associated with the Project.

Conclusion

The No Project/No Development Alternative would avoid all of the significant and potentially significant impacts associated with the project, including: (1) significant and unmitigated transportation/circulation and cumulative air quality (construction-period) impacts; and (2) significant and/or potentially significant impacts related to land use, transportation/circulation, biological resources, historical resources, air quality, public utilities and visual effects (all of which would be avoided or reduced below a level of significance through identified mitigation measures and/or design features). The No Project/No Development Alternative would, however, fail to meet any of the basic project objectives listed above in Section 8.2.1.

8.4.2 No Project/Existing Master Plan Alternative

Description

Under this alternative, the University would continue to build out the remaining applicable portions of the 1996 Master Plan, which includes the 16 previously approved projects identified in Figure 1-1 and Table 1-1. All other areas within the campus would remain in their current condition, including the 14 project sites proposed for development under the Master Plan Update. In addition, campus enrollment would be restricted to 7,000 FTE, in accordance with the existing Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) permit which is the existing level of enrollment at the USD campus. The existing Design Guidelines would be applied to all new construction in this alternative; no updates to the guidelines would be implemented.

The following analysis is based on the findings and conclusions reached in the 1996 Master Plan FEIR and 2008 Wellness Recreation Center Mitigated Negative Declaration (MND), which are incorporated by reference herein and summarized below, as updated by the current analysis of the project revisions.

Environmental Analysis

Land Use

Under the No Project/Existing Master Plan Alternative, the significant, direct and indirect (but mitigable) land use policy impacts related to MHPA adjacency issues identified for the project would be reduced but not avoided because two of the previously approved projects have the potential for land use adjacency impacts as described in the project CEQA document (City 2008b). Significant (mitigated and unmitigated) land use impacts were also identified in the 1996 FEIR for the Northeast Student Housing (Tecolote Canyon Master Plan/Linda Vista Community Plan conformance), Canyon Fill (RPO conformance) and Lower Olin Parking Lot (RPO conformance) projects. However, the associated land use policy impacts would not occur under this alternative because these developments have either been redesigned/relocated or are not included in the list of 16 projects subsequently approved under the 1996 Master Plan.

Transportation/Circulation

The direct and cumulative transportation/circulation (mitigated and unmitigated) impacts identified for the project would not occur under the No Project/Existing Master Plan Alternative because no increase in student enrollment would occur. The traffic conditions associated with 7,000 FTE are described as existing, near-term and long-term without project conditions in Section 5.2. Traffic from the campus would continue to affect the near- and long-term conditions in and around campus, along with traffic from other projects proposed in the study area. As shown in Tables 5.2-9 and 5.2-10, three intersections and four roadway segments would operate poorly in the near-term under this alternative. Poor operating conditions would also occur in long-term at nine intersections, nine road segments, and freeway mainline segments of I-5 and I-8 (as shown in Tables 5.2-14, 5.2-15, and 5.2-17). In addition, as described above for the No Project/No Development Alternative, increased traffic from other sources in the campus vicinity would also be expected to exacerbate existing and future levels of congestion.

Biological Resources

This alternative would avoid the significant, direct and indirect (but mitigable) impacts to biological resources identified for the project, as development proposed under the Master Plan Update would not occur. The 1996 Master Plan FEIR identified significant direct and cumulative impacts to biological resources that would apply to the No Project/Existing Master Plan Alternative, however, including impacts to: (1) sensitive maritime succulent scrub, coastal sage scrub, and southern willow riparian scrub habitats; (2) sensitive species including the coastal California gnatcatcher and coast barrel cactus; and (3) nesting birds (gnatcatcher) from construction-related effects. The 1996 Master Plan FEIR and 2008 Wellness Recreation Center MND identified mitigation measures that would reduce all of the noted biological impacts to below a level of significance.

Historical Resources

Archaeological Resources

Under the No Project/Existing Master Plan Alternative, potentially significant (but mitigable) impacts associated with unknown archaeological resources would not occur, as the associated new development projects would not be implemented. While the 1996 Master Plan FEIR identified potentially significant (but mitigable) impacts related to three unsurveyed areas within the campus, none of the 16 projects subsequently approved under the 1996 Master Plan and subsequent 2008 Wellness Recreation Center MND are located within or adjacent to these areas and associated archaeological impacts would therefore not occur.

Built Environment

Under the No Project/Existing Master Plan Alternative, potentially significant (but mitigable) impacts associated with unknown cultural sites would not occur, as the associated new development projects would not be implemented. While the 1996 Master Plan FEIR identified potentially significant (but mitigable) impacts related to three unsurveyed areas within the campus, none of the 16 projects subsequently approved under the 1996 Master Plan and subsequent 2008 Wellness Recreation Center MND are located within or adjacent to these areas and associated impacts would therefore not occur. Potential impacts to historic structures were not anticipated under the 1996 Master Plan; therefore, this alternative would avoid impacts to historic resources on the campus associated with the Project.

Air Quality

This alternative would avoid the significant (but mitigable), direct air quality impacts identified for the project from TAC emissions, as development under the Master Plan Update would not occur. The 1996 FEIR also identified significant direct impacts from construction-related PM₁₀ emissions, and significant and unmitigated cumulative impacts to overall air quality in the San Diego Air Basin (SDAB) from mobile and stationary sources. Mitigation was identified that would reduce the construction-related impacts below a level of significance, although the cumulative impacts were concluded to be unmitigated.

Public Utilities

Under this alternative, Project Site Nos. 22, 23, 25, and 26 would not be built and would not be placed within the Linda Vista sewer basin. Therefore, this alternative would not increase the amount of sewer flow within the basin and would not contribute to the reduced functioning of reaches 10 through 13. This alternative would avoid the potentially significant (but mitigable) wastewater infrastructure impacts associated with the project.

Visual Effects and Neighborhood Character

The No Project/Existing Master Plan Alternative would avoid the significant direct (but mitigable) impacts identified for the project from landform alteration (encroachment into protected steep slopes and manufactured slopes exceeding 10 feet in height), as development under the Master Plan Update would not occur. The 1996 FEIR, however, identifies similar direct impacts related to

landform alteration, with these impacts potentially applicable to some or all of the 16 approved projects that would be implemented under this alternative. Associated mitigation measures are identified in the 1996 FEIR that would reduce the noted impacts below a level of significance.

Conclusion

The No Project/Existing Master Plan Alternative would avoid a number of significant and potentially significant impacts associated with the project, including: (1) significant and unmitigated transportation/circulation impacts; and (2) significant and/or potentially significant impacts related to land use, transportation/circulation, biological resources, historical resources, air quality, public utilities and visual effects (all of which would be avoided or reduced below a level of significance through identified mitigation measures and/or design features). The No Project/Existing Master Plan Alternative would also, however, result in: (1) significant and unmitigated cumulative impacts to transportation/circulation and air quality; and (2) significant (but mitigable) impacts related to transportation/circulation, biological resources, air quality and visual effects. This alternative would fail to meet most or all of the basic project objectives listed above in Section 8.2.1.

8.4.3 Environmentally Sensitive Lands Avoidance Alternative

Description

Under the ESL Avoidance Alternative, applicable projects under the Master Plan Update that impact ESL habitats or steep slopes would be eliminated or modified to avoid associated ESL impacts. Specifically, this would include Project Site Nos. 19, 22 and 23 (refer to Figure 3-6 and Table 3-1 in Section 3.0, *Project Description*,). Specifically, the ESL Alternative would eliminate a Plaza/Mall/Bridge over Marian Way (Project Site No. 19), and an Academic/Administrative building (Project No. 22). The proposed building containing Student Housing/Parking Structure (Project No. 23) would be modified to avoid ESL (refer to Figure 3-1 for locations). While Project Site Nos. 20 and 27 would technically encroach into the existing MHPA, these sites have been previously developed/disturbed, and a MHPA Boundary Line Correction would be included as part of this alternative (similar to the project) to remove these areas from the MHPA (refer to Figure 5.3-2). Based on the removal of Project Site Nos. 19 and 22 and slight modification to Project Site No. 23 from the Master Plan Update under this alternative, the following alterations to development under the Master Plan Update would result (see statistics in Table 3-1):

- The lot area square footage would be reduced from 827,650 square feet (SF) (Master Plan Update) down to 638,730 SF (ESL Avoidance Alternative), or by approximately 23 percent.
- The building footprint (the approximate portion of the lot that would be covered by a building) would be reduced from 312,450 SF (Master Plan Update) down to 275,450 SF (ESL Avoidance Alternative), or by approximately 18 percent.
- The building gross square footage (GSF) would be reduced from 922,230 (Master Plan Update) down to 746,230 (ESL Avoidance Alternative), or by approximately 19 percent.

Environmental Analysis

Land Use

The ESL being avoided under this alternative occurs outside the MHPA; thus, no significant land use impacts related to MSCP compliance would occur similar to the Project. This alternative would be consistent with the applicable plans and policies and no land use policy impacts would arise.

Transportation/Circulation

The direct and cumulative transportation/circulation (mitigated and unmitigated) impacts identified for the Project would be the same under the ESL Avoidance Alternative, based on the fact that student enrollment would still reach 10,000 FTE. Therefore, traffic impacts projected for the Project would change nominally under the ESL Avoidance Alternative.

Biological Resources

Due to the described elimination of Project Site Nos. 19 and 22 and modification to Project Site No. 23, this alternative would avoid 0.5-acre of significant and direct (but mitigable) impacts identified for the project to: (1) coastal sage scrub and non-native grassland habitats; and (2) nesting birds (refer to Figure 5.3-1 in Section 5.3, *Biological Resources*). The other significant direct/indirect (but mitigable) impacts identified for the project, however, would still occur under this alternative (including indirect impacts from noise [e.g., to nesting birds]).

Historical Resources

Archaeological Resources

Under the ESL Avoidance Alternative, potentially significant (but mitigable) impacts associated with unknown cultural sites identified for the project would not occur for Project Site Nos. 19 and 22, as these sites would not be developed. Modification to Project Site No. 23 would result in a minor decrease in grading. The described potential impacts to unknown archaeological sites would be less than those associated with the project since the other ten projects outlined in the Master Plan Update would still be implemented under this alternative.

Built Environment

Under the ESL Avoidance Alternative, potentially significant (but mitigable) impacts associated with unknown cultural sites and possible historic structures identified for the project would not occur for Project Site Nos. 19 and 22, as these sites would not be developed. Modification to Project Site No. 23 would result in a minor decrease in grading.

Air Quality

The direct, significant (but mitigable) impacts identified for the project related to TAC emissions may be reduced somewhat under the ESL Avoidance Alternative, based on the elimination of Project Site No. 22 and the corresponding reduction of potential TAC sources (e.g., combustion facilities and laboratories). Because this alternative would still include potential TAC emission sources in the remaining development projects, however, associated potential air quality impacts would be

significant. Cumulatively significant and unavoidable construction-related emissions impacts would still be expected under this alternative.

Public Utilities

Under this alternative, Project Site No. 22 would not be developed and would not contribute wastewater to the Linda Vista sewer basin. Therefore, this alternative would not increase the amount of sewer flow within the basin as much as the Master Plan Update and would contribute less to the reduced functioning of reaches 10 through 13. However, this alternative would still develop Project Site Nos. 25, and 26, which would be within the Linda Vista sewer basin. Therefore, sewer flow would still be contributed within the basin and the functioning of reaches 10 through 13 would still be reduced under this alternative. Thus, potentially significant impacts to wastewater infrastructure would be reduced, but would still occur. As described for the Master Plan Update, potential impacts related to wastewater infrastructure would be reduced below a level of significance through the mitigation described in Section 5.7.

Visual Effects and Neighborhood Character

The ESL Avoidance Alternative would avoid any potential significant direct (but mitigable) impacts related to landform alteration (manufactured slopes exceeding 10 feet in height) for Project Site No. 22, as the steep slopes at that location would not be developed. Because this alternative would still potentially include landform alteration impacts at the remaining project sites related to the creation of manufactured slopes in excess of 10 feet in height, however, these potential effects would still be significant. As described for the Master Plan Update, potential impacts related to landform alteration would be reduced below a level of significance through the mitigation described in Section 5.8.

Conclusion

The ESL Avoidance Alternative would avoid or reduce significant and potentially significant impacts associated with issue areas including transportation/circulation, biological resources, historical resources (archaeology), air quality and visual effects (all of which would be avoided or reduced below a level of significance through identified mitigation measures and/or design features). The ESL Avoidance Alternative would, however, still result in significant (but mitigable) impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities and visual effects, and would meet most of the project objectives listed above in Section 8.2.1. Cumulatively significant and unavoidable transportation and construction-related air quality emissions would, however, still occur under this alternative.

8.5 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, another environmentally superior alternative must be identified.

Based on a comparison of the overall environmental impacts for the described alternatives, the No Project/No Development Alternative is identified as the environmentally superior alternative.

Specifically, the No Project/No Development Alternative would not result in any significant impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities or visual resources (refer to Table 8-2, *Comparison of Project and Alternative Impacts*). The No Project/No Development Alternative does not meet the purpose and objectives of the Master Plan Update, however, as outlined above in Section 8.2.1.

Of the remaining alternatives, the environmentally superior alternative is the ESL Avoidance Alternative, which would avoid or reduce a number of significant and potentially significant impacts related to transportation/circulation, biological resources, historical resources, air quality, public utilities, and visual effects. This alternative, however, would still result in a number of significant or potentially significant impacts for the noted issue areas, and would meet most of the identified project objectives.

Table 8-2 COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS				
Environmental Issue Area¹	Project	No Project/No Build Alternative	No Project/ Existing Master Plan Alternative	ESL Avoidance Alternative
Land Use	LS	N	LS	LS
Transportation/Circulation	SU/SM	N	SU-/SM-	SU+/SM+
Biological Resources	SM	N	SM-	SM-
Historical Resources	SM	N	SM	SM-
Air Quality	SU/SM	N	SU+/SM-	SM-
Public Utilities	SM	N	N	SM-
Visual Effects/ Neighborhood Character	SM	N	SM-	SM-

¹ Includes issue areas with significant impacts identified for the Master Plan Update.

SM = significant but mitigable impacts; SU = significant and unmitigated impacts; LS = less than significant;

N = no significant impacts

+ = increased impact level(s) relative to the project; - = reduced impact level(s) relative to the project

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9.0 MITIGATION, MONITORING AND REPORTING PROGRAM

A. GENERAL REQUIREMENTS – PART I

Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II

Post Plan Check (After Permit Issuance/Prior to Start of Construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

Qualified Paleontological Monitor, Qualified Archaeologist, Native American Monitor, Qualified Acoustician, and Qualified Biologist

NOTE: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

Contact Information:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**
 - b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call **RE and MMC at 858-627-3360**
2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) #417090 and/or Environmental Document # 417090, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

NOTE: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

NPDES Permit

4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

Document Submittal/Inspection Checklist		
Issue Area	Document Submittal	Associated Inspection/ Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Land Use	Land Use Adjacency Issues Consultant Site Visit Record	Land Use Adjacency Issues Site Observations
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Archaeology	Archaeology Reports	Archaeology Observation
Historical Resources	Historical Reports	Historical Sites Evaluation
Paleontology	Paleontology Reports	Paleontology Site Observation
Transportation	Traffic Reports	Traffic Features Site Observation
Waste Management	Waste Management Report	Waste Management Inspections
Visual Effects	Contour Grading Verification Letter	Contour Grading/Staking Inspection
Visual Effects	Retaining Wall Verification Letter	Retaining Wall Inspection
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS FROM SUBSEQUENT EIR

Transportation/Circulation

Direct Impacts – Intersections

Tra-1 Traffic Monitoring Program

- Prior to the implementation of mitigation measure Tra-4 and upon enrollment of 7,500 FTE and each increase of 500 additional FTE, USD shall conduct a traffic mitigation monitoring program to monitor current conditions at the impacted intersection and confirm that the traffic signal warrants and LOS operations that serve as the basis for the mitigation measure are met based on the traffic volumes present at that time. The following monitoring steps shall be taken by USD to comply with this measure:
 - a. USD shall submit annual FTE numbers to the City within 6 months of the beginning of the Fall semester following approval of the Master Plan Update. Applicable increases in FTE, as summarized in b) and/or d) below, will trigger the need to conduct a mitigation monitoring study reviewing the conditions at the subject intersection.
 - b. Upon reaching an annual enrollment of 7,500 FTE and upon each subsequent increase of 500 FTE, USD shall submit a mitigation monitoring study for the Linda Vista Road/Alcalá Vista Apartments Entrance intersection ~~at 7,500 FTE (as described in Table 12-3 of the Project's TIA study)~~. As summarized in Table 12-3 of the Project's TIA study, the significant

impact at the Linda Vista Road/ Alcalá Vista Apartments Entrance is expected with the addition of 500 FTE.

- c. ~~Once an applicable increase in FTE triggers the need to conduct an mitigation monitoring study, The mitigation monitoring study requires that~~ USD shall conduct AM and PM peak hour intersection counts at the subject intersection. The counts shall be done for one day on a Tuesday, Wednesday, or Thursday when school is in session during the Fall semester.
 - i. Two analyses shall be conducted in the mitigation monitoring study. The subject intersection shall be analyzed to determine if a significant impact is caused by USD traffic based on the City LOS criteria. The LOS and delay calculated under "Near-Term without Project" conditions in the Project's TIA study will serve as the baseline for comparing LOS and delay in the mitigation monitoring study. A peak hour traffic signal warrant shall also be conducted using the peak hour traffic counts.
 - ii. If the mitigation monitoring analysis determines that USD traffic causes a significant impact and if the peak hour signal warrant shows that the warrant is met, USD shall be responsible for implementing the intersection mitigation measure of signaling the intersection as noted in Tra-4, which includes providing a dedicated southbound left turn lane and a dedicated southbound right turn lane, and coordinating the signal with the downstream signal at the Linda Vista Road/Via las Cumbres intersection to the east.
 - iii. If the mitigation monitoring analysis identifies a significant impact, but signal warrants are not met, an alternative mitigation measure restricting left-turns out of the Alcalá Vista Apartments Entrance by constructing a raised median within Linda Vista Road shall be implemented.
 - iv. The mitigation monitoring study, including the intersection and signal warrant analyses, must be completed and turned into the City's Transportation Development Section each year a study is needed.
- d. If implementation of the mitigation measure is not found to be necessary under the FTE increases outlined in b) above, USD shall be responsible for monitoring the conditions at the intersection(s) with each subsequent increase of 500 FTE (500 FTE, 1,000 FTE, 1,500 FTE etc.).
- e. USD shall be responsible for monitoring the intersection until the need for one of the mitigation measures is triggered, or when the FTE increase reaches 3,000 FTE.

Tra-2 Linda Vista Road/Napa Street

Upon enrollment of 7,350 FTE, USD shall make the first payment of a ~~Payment of "fair-share"~~ contribution of \$297,000 (to be paid in equal payments over a period of five years) toward future improvements to the Morena Corridor Specific Plan area (including the Linda Vista Road/Napa Street intersection), as specified in detail under Tra-5, would partially mitigate the Project's contribution to

this impact. Impacts would still be considered significant and unmitigable because the balance of the cost for the future, undefined, improvements is unfunded and not assured.

Tra-3 Linda Vista Road/Colusa Street

The Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Colusa Street intersection, to the satisfaction of the City Engineer.

To improve overall intersection operations, it is also recommended, but not required, to eliminate six parking spaces along the east curb of Colusa Street to provide a dedicated 150-foot northbound left-turn lane and a dedicated northbound right-turn lane at Linda Vista Road. The provision of the dedicated northbound right-turn and left-turn lanes is not required to mitigate the significant impact.

Tra-4 Linda Vista Road/Alcalá Vista Apartments Entrance

Prior to enrolling 7,500 FTE students, one of two mitigation options shall be implemented once warranted by the mitigation monitoring program outlined in Tra-1.

Option 1: If the monitoring program identifies a significant impact and if the peak hour signal warrant shows that the warrant is met, the Project applicant shall assure by permit and bond the signalization of the Linda Vista Road/Alcalá Vista Apartments Entrance intersection, provide a dedicated southbound left turn lane and dedicated southbound right turn lane, and coordinate the signal with the downstream signal at Via las Cumbres to the east, to the satisfaction of the City Engineer.

Option 2: If the monitoring program identifies a significant impact, but signal warrants are not met, the Project applicant shall assure by permit and bond an alternative measure restricting left-turns out of the Alcalá Apartments Entrance by constructing a raised median within Linda Vista Road. Left-turns in would continue to be allowed.

Direct Impacts – Roadway Segments

Tra-5 Linda Vista Road: Napa Street to Marian Way (Mildred Street)

The following measure is required to partially mitigate the Project's direct significant impact to the subject roadway segment, with the impact still considered significant and unmitigable because the balance of the cost for the future, undefined, improvements is unfunded and not assured

- Prior to enrolling 7,350 FTE students, the Project applicant shall be required to provide a "fair share" contribution of \$297,000 (to be made in five equal payments over five years) towards future improvements to the Morena Corridor Specific Plan area (including the segment of Linda Vista Road between Napa Street and Marian Way [Mildred Street]), to the satisfaction of the City Engineer.

Cumulative Impacts – Intersections

The following measures are required to mitigate the Project's cumulatively significant impacts to intersections:

Tra-6 Linda Vista Road/Napa Street

Implementation of Tra-2, as outlined above under Direct Impacts, would partially mitigate the Project's proportionate share of the cumulative impacts; however, the identified cumulative impact to the Linda Vista Road/Napa Street intersection is considered cumulatively significant and unmitigated because the balance of the cost of the future, undefined, improvements is unfunded and not assured.

Tra-7 Linda Vista Road/Colusa Street

Implementation of Mitigation Measure Tra-3, as outlined above under Direct Impacts, would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Colusa Street intersection.

Implementation of Mitigation Measures Tra-1 and Tra-4, as outlined above under Direct Impacts, would mitigate the Project-related significant cumulative impact at the Linda Vista Road/Alcalá Vista Apartments Entrance intersection.

Cumulative Impacts – Roadway Segments

The Long-Term (2035) scenario assumes the fully funded Phase I of the SR 163/Friars Road Interchange Project, which includes improvements to the segment of Friars Road from Avenida de las Tiendas to Ulric Street/SR 163 SB Ramps. The timing and scope of Phases II and III of the Interchange Project are yet to be determined, contingent on funding, and will likely not include further improvements to this segment. Since there are no improvement projects towards which the Project can contribute a fair share payment, this impact is considered cumulatively significant and unmitigated in the Long-Term condition.

Biological Resources

Bio-1 Biological Resource Protection

I. Prior to Construction

- A. **Biologist Verification** – The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the biological monitoring program in this mitigation measure. The letter shall include the names and contact information of all persons involved in the biological monitoring of the Master Plan Update area.
- B. **Preconstruction Meeting** – The Qualified Biologist shall attend a pre-construction meeting, discuss the Master Plan Update's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents** – The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines,

Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

- D. **Biological Construction Mitigation/Monitoring Exhibit** – The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the Biological Documents listed above. In addition, include as applicable: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the Master Plan Update's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- F. **Resource Delineation** – Prior to construction activities, the Qualified Biologist shall supervise the placement of silt and orange construction fencing or equivalent along the limits of disturbance (for Project Sites Nos. 17, 19, 20, 22, 23, and 27) and verify compliance with any other conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- G. **Education** – Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** – All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC on the first day of monitoring, the first week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification** – The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be

delayed until specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, State, and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

Bio-2 Sensitive Vegetation Communities

Impacts to 0.5 acre of Diegan coastal sage scrub shall be mitigated at a ratio of 1:1 pursuant to Table 3, Upland Mitigation Ratios, in the City's Biology Guidelines (City 2012) for impacts outside the MHPA and mitigation inside the MHPA. Mitigation shall be accomplished via payment in to the City's Habitat Acquisition Fund equal to 0.5 acre of habitat.

Bio-3 Nesting Cooper's Hawks

To avoid impacts to Cooper's hawk, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for this species (February 1 to September 15).

If removal of habitat within 300 feet of the MHPA (Projects 20, 21, 24, 27, and 28) must occur during the breeding season (February 1 to September 15), the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting Cooper's hawk within the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities.

If nesting Cooper's hawk are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan will include the establishment of a 300-foot construction avoidance area that shall be maintained around any active Cooper's hawk nest located inside the MHPA until the nest is no longer active as determined by the Qualified Biologist. The report or plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting Cooper's hawk are not detected during the precon survey, no further mitigation is required.

Historical Resources

Hist/Arch-1

Built Environment. The following measure shall be implemented for USD Master Plan Update project sites impacting structures 45 years of age or older at the time the construction permit, including any demolition permit, project application is submitted:

I. Prior to Permit Issuance

For any future projects that propose additions or modifications to structures or landscape features 45 years old or older, the structure or landscape feature shall be reviewed by qualified historic staff at the City of San Diego to determine whether or not the resource may meet one or more criteria for historic designation and therefore be considered potentially historic. If the structure or landscape feature being modified or removed by the construction is not assessed as potentially historic, the project shall proceed and no further mitigation will be required. If the evaluation determines that the project could affect potentially significant historic resources, then the following three listed items shall apply:

1. If the evaluation determines that the project is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, then the potential historic significance will be documented and the project may be found to be in Substantial Conformance with the Master Plan and SEIR.
2. If the evaluation determines that the project is not consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties, the project shall be redesigned to be consistent with the Standards, or a historic report that evaluates the building or landscape feature's integrity and eligibility under all designation criteria shall be completed and forwarded to the Historical Resources Board for review and consideration.

Historical Resources

Hist/Arch-2

Archaeology. The following measure shall be implemented for USD Master Plan Update project sites relative to unknown cultural resources:

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼-mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

- a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
- b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.**
2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.

4. The archaeological and Native American consultant/monitor shall document field activity via the CSV. The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or **BI, as appropriate.**
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.

C. Determination of Significance

1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. **Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.**
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate Discovery Site

1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:

- a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
- b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
- c. In order to protect these sites, the Landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
- d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and items associated and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.

D. If Human Remains are NOT Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or Weekend Work is Included in the Contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.
 - a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.
 - b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III – During Construction and IV-Discovery of Human Remains shall be followed.
 - d. The PI shall immediately contact MMC, or by 8 AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If Night and/or Weekend Work Becomes Necessary During the Course of Construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. **It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.**
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation: The PI shall be responsible for recording (on the appropriate State of California

Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
2. The PI shall include the Acceptance Verification from the curation institution in the **Final Monitoring Report submitted to the RE or BI and MMC.**
3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

D. Final Monitoring Report(s)

1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.

2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

Air Quality (Air Toxics)

AQ-1 Health Risk Assessment

Prior to the issuance of grading permits for any new facility that would have the potential to emit TACs, in accordance with AB 2588, an emissions inventory and health risk assessment shall be prepared. Building permits shall only be issued for facilities that demonstrate TAC emissions below the standards listed in Table 5.5-4 (excess cancer risk of 1 in 1 million or 10 in 1 million with Toxics-Best Available Control Technology [T-BACT] and non-cancer hazard index of 1.0).

Public Utilities

PU-1 Wastewater Infrastructure Improvements

At the time of the Building Permit application for Project Site Nos. 22, 23, 25 and/or 26, located within the off-site Linda Vista sewer basin, the University shall conduct sewer flow metering of the undersized sewer mains. If the results of the sewer flow metering are different than those included in the Master Plan Sewer Study (KLE 2016b), the University shall present the results to the City PUD for review and approval. For each project located within the Linda Vista Road sewer basin that is calculated to result in increased flows to the undersized sewer main reaches 10 through 13, the University shall work with the City's PUD to either:

- Determine appropriate phasing and potential cost sharing for the upsizing of sewer reaches 10 through 13 to 10-inch sewer mains; or
- Pursue redirecting, via a private sewer pump station, the project(s)'s sewer flows from the existing public offsite Linda Vista sewer system into the existing public Tecolote Canyon Trunk Sewer. If this option is pursued, the offsite Linda Vista undersized sewer mains would not be required to be upsized as part of the above mentioned campus projects.

Visual Effects/Neighborhood Character

Vis-1

Steep Slopes. Prior to issuance of a grading permit for construction proposed to encroach into steep slopes (i.e., Project Site No. 22), a detailed grading plan shall be submitted to the City's Development Services Department and shall demonstrate to the satisfaction of the City Engineer substantial conformance with all grading policies in place at the time of project application. Special design requirements for slopes that are to be graded shall be clearly indicated on the grading plan. At a minimum, proposed manufactured slopes shall imitate, to the extent feasible, the existing landform features through the use of: (1) contour grading and terracing to avoid extreme slope faces; (2) undulation to avoid straight slope faces; (3) rounding the tops and toes of slopes to simulate

natural contours; and (4) slopes that do not exceed a grade of 2:1. Grading plans shall be reviewed by the City to ensure that sensitive grading techniques are being utilized.

D. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS FROM 1996 MASTER PLAN FEIR

Paleontological Resources

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD

1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon

Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

- a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
- b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence, or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**
2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

3. The monitor shall document field activity via the CSV. The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.

2. The following procedures shall be followed.

- a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSV and submit to MMC via fax by 8AM on the next business day.
- b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
- c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
- d. The PI shall immediately contact MMC, or by 8 AM on the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

- a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

- b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate

C. Curation of fossil remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

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10.2 Individuals and Organizations Consulted

No contacts with outside agency staff required to prepare this SEIR.

11.0 CERTIFICATION PAGE

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department (DSD) Environmental Review manager and is based on independent analysis and determinations made pursuant to SDMC Section 128.0103.

City of San Diego

Development Services Department

Eddmond Alberto, LDR Transportation

Gary Geiler, LDR Planning

Daniel Neri, LDR Landscaping

James Quinn, LDR Geology

Lindsey Sebastian, LDR Environmental

Elizabeth Shearer-Nguyen, LDR Environmental

Jeff Tamares, LDR Engineering

Planning Department

Jeff Harkness, Park and Recreation

Holly Smit-Kicklighter, MSCP

Jodie Brown, Plan – Historic

Naomi Siodmok, Long-Range Planning

Charlette Strong-Williams, Facilities Financing

Public Utilities Department

Seevani Bista, Water & Sewer

George Adrian, Water & Sewer

Mahmood Keshavarzi, Water & Sewer

Fire – Rescue Department

Larry Trame

Police Department

Michael Pridemore

Environmental Services Department

Lisa Wood

EIR Preparers

HELIX Environmental Planning, Inc. (HELIX)

Kim Baranek, Senior Project Manager

Lisa Capper

Debbie Clayton

Lara Costantino Grimmer

Stacy Gomez

Dennis Marcin
Victor Ortiz
Jason Runyan
Vanessa Toscano
Bill Vosti

Technical Appendices Preparers

HELIX Environmental Planning, Inc.: Biological Resources Technical Report (Appendix D);
Archaeological Resources Report (Appendix E); Air Quality Technical Report (Appendix F);
Waste Management Plan (Appendix K); Acoustical Analysis (Appendix M)

Debbie Clayton, Biological Resources
Nicole Falvey, Biological Resources
Victor Ortiz, Air Quality
Mary Robbins-Wade, Archaeological Resources
W. Larry Sward, Biological Resources
Charles Terry, Acoustics
Vanessa Toscano, Waste Management
Bill Vosti, Acoustics

Kleinfelder – Geotechnical Feasibility Evaluation (Appendix L)
Kevin Crennan
Scott Rugg

Kettler-Leweck Engineering – Preliminary Drainage Report (Appendix G); Preliminary Storm Water
Quality Master Plan (Appendix G); Preliminary Water Study (Appendix I); Preliminary Sewer Study
(Appendix J); Proposed Sewer Map (Appendix J)
Steven Kettler
Mike Yentile

Linscott, Law & Greenspan – Transportation/Circulation (Appendix C)
John Boarman
Amelia Giacalone
Jorge Cuyuch

Other Contributors

University of San Diego
Roger Manion
Melissa Plaskanos

M.W Steele
Diego Valesco