Balboa Avenue Station Area Specific Plan
Final Program Environmental Impact Report

Project No. 586601
SCH No. 2017071007
July 11, 2019

The Balboa Avenue Station Area Specific Plan Final Program Environmental Impact Report (Final PEIR) dated November 16, 2018, includes changes that were made to the document since the public review Draft PEIR dated April 13, 2018. These changes are shown in ~~strikeout~~/underline format. Subsequent to distribution of the Final PEIR, additional edits were made to correct factual inaccuracies or typographical errors, or to provide clarifying information in the Final PEIR that are described in these errata, as indicated below in ~~strikeout~~/underline format.

In accordance with California Environmental Quality Act (CEQA) Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modification 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 identification of new significant environmental impacts or with the addition of a new mitigation measure required to avoid a significant environmental impact. These corrections do not result in any new physical effects and do not affect the conclusions of the environmental analysis contained within the Final PEIR. Therefore, in accordance with CEQA Section 15088.5, recirculation of the Final PEIR is not required.

Corrections:

1. In Conclusions, the last paragraph on page 2 is revised as follows:

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Air Quality (Conformance to the Regional Air Quality Strategy, Conformance to Federal and State Ambient Air Quality Standards, Cumulatively Considerable Net Increase of Criteria Pollutants), Historical and Tribal Cultural Resources (Historic Resources, Archaeological Resources, and Tribal Cultural Resources), Noise (Excessive Ground-borne Vibration, Construction Noise), ~~Paleontological~~**

~~**Resources (Ministerial Development),**~~ and **Transportation/Circulation (Vehicular Traffic Circulation)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

2. Pages RTC-43 and RTC-56 of the Comment Letters and Responses are revised as follows:

The statements that describe potential impacts to paleontological resources as significant and unavoidable are revised to read that potential impacts to paleontological resources would be less than significant.

3. Response AH-15 on page RTC-104 is revised as follows:

Section 5.15.6 of the PEIR is consistent with the Traffic Impact Study (TIS) prepared for the proposed project and included as Appendix K of the PEIR. The referenced page 8-15 of the TIS addresses the Adopted Community Plan Scenario; identified mitigation measures for the proposed BASASP are listed starting on page 8-39 of the TIS. Section 5.15.6.2 of the PEIR identifies which specific improvements are proposed as part of the BASASP and include improvements at four intersections (Garnet Avenue/Olney Street [TRANS 5.15-5, SDR-7], Garnet Avenue/Mission Bay Drive [TRANS 5.15-6, SDR-6], Balboa Avenue/Morena Boulevard [TRANS 5.15-7, SDR-4], and Morena Boulevard/Jutland Drive [TRANS 5.15-9, SDR-5]).

4. Response AH-23 on page RTC-108 is revised as follows:

Section 5.15.6.1 of the PEIR identifies a significant impact at the intersection of Garnet Avenue and Mission Bay Drive during the PM peak period (Impact 5.15-6). Mitigation is identified in Section 5.15.6.2 of the PEIR (TRANS 5.15-6, SDR-6) that would reduce this impact to a less-than significant level. The analysis of intersections was conducted in accordance with the methodology contained in the City's Traffic Study Impact Manual.

5. The second paragraph in Response AJ-2 on page RTC-133 is revised as follows:

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

6. The fifth paragraph on page ES-2 is revised as follows:

In addition to City Council adoption of the proposed BASASP and certification of the PEIR, the project includes the following discretionary actions: an amendment to the General Plan, Pacific Beach Community Plan/LCP, an amendment to the Clairemont Mesa Community Plan, and approval of the proposed rezone.

7. Section ES.4, Issues to be Resolved by the Decision-Making Body, is revised as follows:

The City Council must review the proposed BASASP and this PEIR and determine if implementation of the proposed BASASP or one of the alternatives presented in Chapter 10.0, *Alternatives*, should be adopted. If the proposed project is selected for adoption, the City Council will be required to certify

the Final PEIR, determine whether and how to mitigate significant impacts, and adopt associated Findings pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the PEIR:

- Air Quality;
- Biological Resources;
- Historical and Tribal Cultural Resources;
- Noise; and
- ~~Paleontological Resources; and~~
- Transportation/Circulation.

Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be significant and unmitigable, comprised of air quality (air quality plan consistency, construction and operations air emissions, and cumulative air emissions), cumulative transportation/circulation (impacts to roadway segments, intersections, and freeway facilities), historical and tribal cultural resources, and noise (vibration and construction noise)~~, and paleontological resources (ministerial projects)~~.

8. The final paragraph on page ES-6 is revised as follows:

Therefore, the environmentally superior alternative is the Medium Density Alternative. This alternative would reduce cumulatively significant and unavoidable impacts to transportation/ circulation (intersections). The Medium Density Alternative would also result in similar or reduced impact levels for issue areas determined to be significant under the proposed BASASP, including air quality, biological resources, historical and tribal cultural resources, and noise~~, and paleontological resources~~. As described for the proposed BASASP, this alternative would have cumulatively significant and unavoidable impacts related to air quality, historical and tribal cultural resources, ~~paleontological resources,~~ and transportation/circulation.

9. Table ES-1 is revised to remove Paleontological Resources.

10. The Transportation/Circulation section of Table ES-1 on pages ES-12 and ES-13 is revised to state, within the Impact column, that all BASASP impacts to roadway segments, intersections, or freeways are cumulative.

11. The Mitigation column for Intersections in the Transportation/Circulation section of Table ES-1 on page ES-12 is revised as follows:

~~Mitigation Measure TRANS 5.15-5, as identified in Section 5.15, *Transportation/Circulation*~~ Supplemental Development Regulation (SDR) 7
~~Mitigation Measure TRANS 5.15-6, as identified in Section 5.15, *Transportation/Circulation* SDR-6~~

~~Mitigation Measure TRANS 5.15-7, as identified in Section 5.15, *Transportation/Circulation*~~ SDR-4
Mitigation Measure TRANS 5.15-8, as identified in Section 5.15, *Transportation/Circulation*
~~Mitigation Measure TRANS 5.15-9, as identified in Section 5.15, *Transportation/Circulation*~~ SDR-5

12. Table ES-2 is revised as follows:

Table ES-2
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Notes

LS = Less than significant
SM = Significant and mitigated
SU = Significant and unavoidable
+ = more than proposed project
= = equal to proposed project
- = less than proposed project

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Air Quality	Regional Air Quality Plan Conformance	SU	SU	LS	LS	SU (-)	SU (-)
	Construction Emissions	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Operation Emissions	SU	SU	SU (-)	SU (-)	SU (-)	SU (-)
	Sensitive Receptors	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Odors	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
Biological Resources	Sensitive Species	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Sensitive Habitats	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Wetlands	LS	LS	SM	LS (=)	LS (=)	LS (=)
	Wildlife Movement	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Conservation Planning	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	LS ~~SM~~ (=)	LS (=)
	Edge Effects	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	LS ~~SM~~ (=)	LS (=)
	Policy Conformance	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Invasive Species	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	~~LS SM~~ LS (=)	LS (=)

Table ES-2 (cont.)
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Tribal Cultural Resources	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
Noise	Regulatory Conformance	SM	LS	SM (=)	LS (=)	SM (-)	LS (=)
	Noise Levels	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Vibration	SU	LS	SU (-)	LS (-)	SU (-)	LS (-)
	Construction Noise	SU	LS	SU (=)	LS (=)	SU (=)	LS (=)
Paleontological Resources	Sensitive Formations	LS ~~SU~~	LS ~~SU~~	LS ~~SU~~ (-)	LS ~~SU~~ (-)	LS ~~SU~~ (=)	LS ~~SU~~ (=)
Transportation/ Circulation	Alternative Mode Trips	LS	LS	SU (+)	SU (+)	~~SU~~ LS (+-)	~~SU~~ LS (+-)
	Alternative Transportation	LS	LS	SU (+)	SU (+)	LS (-)	LS (-)
	Road Segments, Intersections, and Freeway Facilities	SU	SU	SU (+)	SU (+)	SU (-)	SU (-)

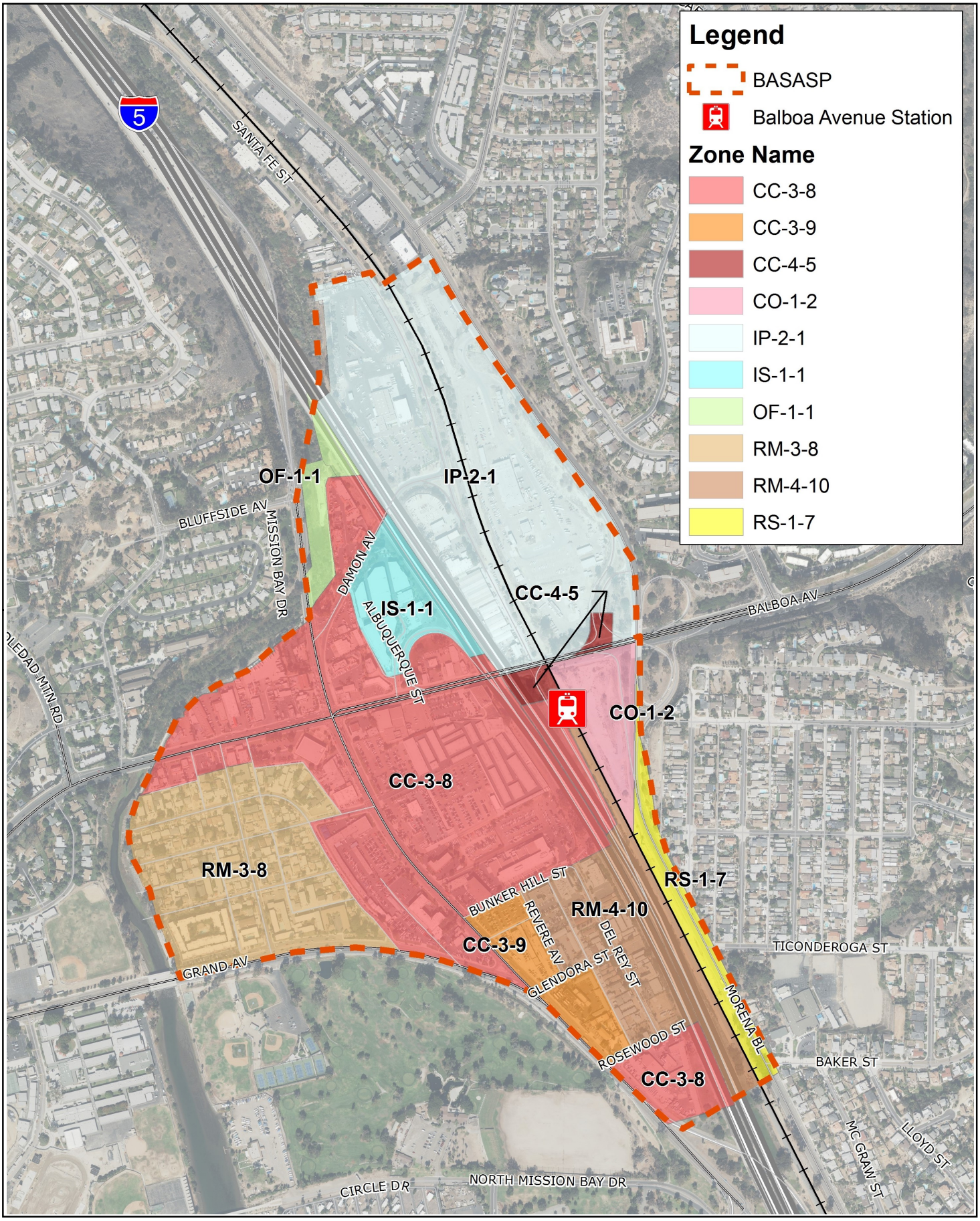
13. Table 3-1, on page 3-5, is revised as follows:

Table 3-1
PROPOSED NEW LAND USE DESIGNATIONS, WITH ASSOCIATED ZONE CLASSIFICATIONS, AND ZONE PURPOSE[1]

Land Use Designation	Zone Classification	Zone Purpose
Residential (15-54 du/ac)	RM-3-8	The purpose of the RM-3-8 zone is to provide for multiple dwelling unit development at a maximum density of 1 dwelling unit for each 800 square feet of lot area.
Community Village (0-73 du/ac)	CC-3-8	The purpose of the CC-3-8 zone is to accommodate community-serving commercial services and retail uses with a high intensity, pedestrian orientation, which permits a maximum of 1 dwelling unit for each 600 square feet of lot area.
Community Village (0-109 du/ac)	CC-3-9	The purpose of the CC-3-9 zone is to accommodate community-serving commercial services and retail uses with a high intensity, pedestrian orientation, which permits a maximum of 1 dwelling unit for each 400 square feet of lot area.
	RM-4-10	The RM-4-10 zone permits urbanized, high density multiple dwelling units with limited commercial uses and a maximum density of 1 dwelling unit for each 400 square feet of lot area.
~~Light Industrial~~	~~IS-1-1~~	~~The purpose of the IS-1-1 zone is to provide for small-scale industrial activities within urbanized areas.~~
~~Flood Control/Open Space~~	~~OF-1-1~~	~~The purpose of the OF-1-1 zone is to control development within floodplains.~~

1. None of the land in the Clairemont Mesa Community would be redesignated or rezoned.
Source: City of San Diego 2017
du/ac = dwelling units per acre

14. Figure 3-2, Proposed Zoning Map, is revised to include RS-1-7, as follows:



Balboa Avenue Station Area Specific Plan

0 750 1,500

Feet

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Proposed Zoning Map

Figure 3-2

15. The list of supplemental development regulations within the discussion of the Community Village designation on page 3-7 is revised as follows:

Additionally, the proposed BASASP establishes supplemental design regulations for land designated as Community Village that would allow for:

- Residential uses on the ground-floor of properties designated Community Village which are not identified as Active Commercial Frontage as shown on Figure 3-1; ~~and~~
- The disallowance of new vehicle and vehicular equipment sales;
- Mobility improvements at the intersections of Garnet Avenue and Olney Street, Garnet Avenue at Mission Bay Drive, Morena Boulevard northbound ramp and Balboa Avenue, and Morena Boulevard at Jutland Drive; and
- Requirement for a multi-use path and street trees on streets identified with Active Commercial Frontages in the Community Village designation.

16. The first paragraph in Section 3.7.1, Specific Plan Administration, is revised as follows:

The proposed BASASP is subject to the procedures and standards established for specific plans by the San Diego Municipal Code (Section 122.0101-0107), which incorporate by reference ~~. The proposed BASASP is also subject to~~ the California Government Code (Sections 65450 through 65457). In turn, all subsequent development proposals, such as tentative subdivision maps, site plans, improvement plans, and all public works projects, must be consistent with the adopted BASASP.

17. The second paragraph of Section 5.1.4.1 is revised as follows:

The Land Use chapter of the BASASP ~~is proposed to (1)~~ establishes the distribution and pattern of land uses throughout the community, and ~~(2)~~ outlines area-specific policies to guide future development and redevelopment. The land use policies in the BASASP are focused on encouraging development and redevelopment within the Pacific Beach portion of the BASASP area; properties located within the Clairemont Mesa area are not subject to the BASASP ~~policies and~~ supplemental development regulations. Land uses within the Clairemont Mesa portion of the BASASP area would not change. As with the Land Use and Community Planning Element of the General Plan, the proposed BASASP places an emphasis on directing growth into a mixed-use community village that is pedestrian-friendly and linked through multi-modal improvements to the regional transit system.

18. Table 5.1-13, Existing and Proposed Zone Classifications is revised as follows:

19.

Table 5.1-13
EXISTING AND PROPOSED ZONE CLASSIFICATIONS

Existing Zone Classification	Proposed Zone Classifications
Residential RM 2-5	Residential RM-3-8
Residential RM 4-10	Residential RM-4-10 Commercial CC 3-8
Residential RS-1-1	Open Space OF-1-1
~~Residential RS-1-7~~	~~Open Space OF-1-1~~
Commercial CC-4-2	Commercial CC-3-8 Commercial CC-3-9 Residential RM-4-10
Commercial CC-4-5	Commercial CC-4-5
Commercial/Office CO-1-2	Commercial/Office CO-1-2
Commercial CV-1-2	Commercial CC-3-8 Commercial CC-3-9
Industrial IL-3-1	~~Open Space OF-1-1~~ Commercial CC-3-8
Industrial IP-2-1	Industrial IP-2-1
Industrial IS-1-1	Industrial IS-1-1/Commercial CC-3-8

1. Existing industrial-zoned land in Pacific Beach Community would remain, except for where it overlaps with Rose Creek open space.
2. None of the land in the Clairemont Mesa Community would be rezoned.

20. Section 5.1.5.2 is revised as follows:

Potential environmental plan consistency impacts would be less than significant because planned improvements and future development that could occur under the proposed BASASP would not encroach into sensitive resources in the Rose Creek MHPA and the portion of the MHPA where development could occur does not contain sensitive resources. A Boundary Line Correction could be processed in the future, as permitted under the City Biology Guidelines and MSCP, to remove previously developed lands from the MHPA and avoid land use policy impacts. Future development adjacent to the MHPA would be required to comply with the MSCP Land Use Adjacency Guidelines. ~~as part of the Mitigation Framework in the PEIR (see BIO-8 in Section 5.3).~~ Less than significant impacts are identified.

21. The City of San Diego Environmentally Sensitive Lands Regulations section, on page 5.3-31, is revised as follows:

Environmentally Sensitive Lands (ESL) include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and 100-year floodplains. Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2012) as outlined in the City's Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). ~~Impacts to~~ Projects with biological resources within and outside the MHPA must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City.

22. The Impacts section of Section 5.11, Paleontological Resources, is revised as follows:

5.11.4.1 Impacts

The BASASP area includes a number of formations (old paralic deposits, San Diego, Scripps, Mount Soledad, Ardath Shale) characterized with a high paleontological resources sensitivity rating. Future development projects implemented under the proposed Specific Plan that would involve excavation into the underlying geological formations could expose these formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified could also result in a significant impact. While much of the Specific Plan area is underlain by artificial fill with no potential to uncover paleontological resources, the above-mentioned formations have high resource sensitivity where fossils could be uncovered during future construction-related activities. Buildout of future projects would likely result in a certain amount of disturbance to the native bedrock within the Specific Plan area. Pursuant to SDMC Section 142.0151, all future development is required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the San Diego Municipal Code, would ensure that impacts to paleontological resources would be less than significant. ~~While portions of the BASASP area have been previously disturbed and developed with existing urban uses, grading associated with future development activities implemented in accordance with the proposed project involving excavation which exceeds the criteria noted above in Section 5.11.3 (i.e., grading in excess of 1,000 cubic yards, extending to a depth of 10 feet or greater into high sensitivity formations, or that require grading in excess of 2,000 cubic yards, extending to a depth of 10 feet or greater into moderate sensitivity formations), could potentially expose undisturbed formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a significant impact~~

~~Build-out of future ministerial projects implemented in accordance with the proposed project would likely result in a certain amount of disturbance to the native bedrock within the BASASP area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and to apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with the proposed project would be potentially significant.~~

5.11.4.2 Significance of Impacts

Impacts would be less than significant; therefore, no additional mitigation measures are required.

~~Based on the presence of formational units exhibiting high potential for the occurrence of sensitive paleontological resources in the BASASP area, potential impacts from future discretionary and ministerial projects within the BASASP area would be potentially significant.~~

5.11.4.3 Mitigation Framework

Impacts would be less than significant; therefore, no additional mitigation measures are required.

~~To reduce the potential adverse impact to paleontological resources associated with discretionary projects, future discretionary project would incorporate the mitigation measure identified in the General Plan PEIR addressing paleontological resource impacts.~~

~~The following measure would apply to any discretionary project that proposes subsurface disturbance within a high or moderate sensitivity formation. If no subsurface disturbance is planned, then paleontological resources would not be impacted and development of a project-specific paleontological monitoring and discovery treatment plan would not be necessary. The following mitigation measure would reduce paleontological resource impacts resulting from implementation of future discretionary projects to below a level of significance:~~

~~**PALEO-1: Paleontological Review and Monitoring**~~

~~Prior to the approval of future discretionary development projects implemented in accordance with the proposed project, the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Determination Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future development projects that are subject to environmental review.~~

~~I. Prior to Project Approval:~~

~~A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable USGS Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:~~

- ~~Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.~~
- ~~Require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.~~
- ~~Require construction within a known fossil location or fossil recovery site.~~

~~Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.~~

~~B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.~~

- ~~Monitoring is always required when grading on a fossil recovery site or a known fossil location.~~

- ~~Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).~~
- ~~Monitoring may be required for shallow grading (less than 10 feet) when a site has previously been graded and/or unweathered geologic deposits/ formations/rock units are present at the surface.~~
- ~~Monitoring is not required when grading documented artificial fill.~~
- ~~When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological MMRP shall be implemented during construction grading activities.~~

Significance After Mitigation

Impacts would be less than significant.

~~All future discretionary projects that would occur as a result of the project would be required to comply with Mitigation Measure PALEO-1. Implementation of Mitigation Measure PALEO-1 would reduce paleontological impacts associated with future discretionary development to below a level of significance.~~

~~Future ministerial projects proposed in conformance with the proposed project would also likely result in a certain amount of disturbance to the native bedrock within the BASASP area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with development of the proposed project would remain significant and unavoidable.~~

23. Section 5.13.4 is revised as follows:

*Would the proposed BASASP promote growth patterns that would result in the need for and/or provision of new or physically altered public facilities (*including fire protection, police protection, parks or other recreational facilities, schools, or libraries*), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?*

5.13.4.1 Impacts

Additional development resulting from implementation of the proposed project would increase demand for public services and facilities within the BASASP area. Significant physical impacts could result if this increased demand necessitates the expansion of existing or construction of new public facilities.

Fire Protection

Implementation of the proposed project would result in an increased population within the BASASP area, thus increasing the demand for fire protection services. Development within the BASASP area

would be constructed per applicable California Building and Fire codes and NFPA codes, and would be required to pay Development Impact Fees (DIFs), which are used to fund future facilities, including planned fire stations. The SDFD has an adequate number of facilities and staffing to serve the BASASP area. Although implementation of the proposed project would result in increases in fire calls for service, no new facilities or improvements to existing facilities beyond those already identified as needed in the existing Pacific Beach and Clairemont Mesa Community Plans would be required as a result of the proposed project.

Police Protection

The projected population for the BASASP area at build-out under the proposed project is estimated to be 9,411 residents; the existing population is estimated to be 2,318. This increase in population would result in a proportionate increase in demand for police protection services. As shown in Table 5.13-4, the average response times for Beat 113 and 116 are above both the citywide average and General Plan goals for all types of calls. Beat 122 average response times are above citywide average and General Plan goals for all types of calls except for Priority E. Police response times in this community could potentially increase with the build-out of the proposed project. The SDPD strives to maintain the response time goals as one metric used to assess the level of service to the community. The citywide staffing ratio for police officers to population is 1.34 sworn officers per 1,000 residents (City 2017g). However, SDPD does not staff individual stations based on the sworn officers per 1,000-population ratio. Although implementation of the proposed project would result in increases in police protection calls for service, no new facilities or improvements to existing facilities beyond those already identified as needed in the existing Pacific Beach and Clairemont Mesa Community Plans would be required as a result of the proposed project.

Parks and Recreation

As discussed under Existing Conditions, the Pacific Beach and Clairemont Mesa communities are currently deficient in public park space. Implementation of the proposed project would increase residents in the BASASP area and the BASASP does not propose additional parkland. Thus, a deficit of parkland in the community would continue with buildout of the proposed project.

The proposed project is not required to address the current or projected deficits. Implementation of the proposed BASASP would provide policy support for increasing the amount of parkland in the area but ~~does not propose construction of new facilities~~ no new park facilities beyond those already identified in the existing Pacific Beach and Clairemont Mesa Community Plans are proposed at the time. Thus, implementation of the BASASP would result in a less than significant impact ~~associated with the construction of new facilities~~.

Schools

The increase in population associated with development pursuant to the proposed project would generate additional school-aged children attending schools which serve the BASASP area. Based on the school enrollment and capacity data obtained from the SDUSD, school-aged children associated with future development in accordance with the proposed project would not exceed the capacity and school sizing goals for middle or high schools in the area. While Sessions Elementary School is currently at capacity, there are three additional elementary schools with available capacity and it is not anticipated that new schools would be needed to accommodate buildout of the BASASP area.

Additionally, verification from SDUSD would be required for all future development and payment of school fees would be mandated at the time building permits are requested.

Libraries

As indicated earlier, the size of existing libraries serving the BASASP area does not meet the General Plan standard for a library. No new libraries are included as part of the proposed project and, similar to the discussion for parks and recreation, the project is not required to address deficits. ~~As such, payment of DIFs, collected at the time of building permits are issued for specific future development, would offset the impacts of a proposed development on libraries.~~

24. Section 5.14.5.2 is revised as follows:

As stated above, ~~systematic improvements to~~ water, wastewater, and storm water facilities throughout the BASASP area are upgraded and repaired ~~expected to be provided~~ as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process. Upgrades to water and sewer are ~~administered by the PUD and are~~ handled on a project-by-project basis through the City's Capital Improvements Program (CIP). Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Transportation and Storm Water Department (T&SW). Per City Council Policy 800-04, private land owners and developers are responsible for upgrading and maintaining storm water drainage facilities on private property. Future development pursuant to the BASASP would increase demand for water and sewer facilities, which could create a need to increase sizing of existing facilities. However, the Public Works Department (PWD), which oversees the CIP, plans capital improvement projects several years prior to actually reaching capacity. As the BASASP area is already urbanized and the existing water and sewer facilities are within existing ROW that has previously been graded, upgrades and repairs to the existing facilities as a result of increased demand from development per the BASASP would not have a significant effect on the environment. ~~projects will be reviewed by the City to determine any significant adverse effects to the City's storm water system, as well as any significant impacts associated with the installation of new storm water infrastructure, and these significant impacts would be avoided~~. Therefore, impacts to water, sewer, and storm water utilities would be less than significant.

25. Section 5.15.6.1 is revised as follows:

Future year traffic volumes were derived from the SANDAG year 2035 modeling and calibrated for the BASASP area. The projections include the change in land use assumptions associated with the BASASP and recommended transportation network to connect people to the new Balboa Avenue Station via all modes of travel. Analysis of future condition includes the following ~~four~~ five improvements that are included within the BASASP:

26. Section 5.15.6.2, Mitigation Framework, is revised as follows:

5.15.6.2 Mitigation Framework

At the program level, impact reduction occurs through identification of necessary roadway, intersection, and freeway improvements. Mitigation or construction of these improvements would be carried out at the project level.

Roadway Segments

The TIS identified and evaluated a number of roadway segment improvements that could mitigate or reduce the roadway segment impacts identified above. While the following roadway segment mitigation measures would reduce potentially significant impacts, none are proposed as part of the BASASP and associated discretionary actions for reasons described in Section 5.15.6.3.

TRANS 5.15-1: Garnet Avenue (Impact 5.15-1)

a. Mission Bay Drive to I-5 southbound on-ramp: Widen the roadway segment to a 6-lane Major Arterial.

b. I-5 southbound on-ramp to I-5 northbound off-ramp: Widen the roadway segment to an 8-lane Major Arterial.

c. I-5 northbound off-ramp to Morena Boulevard southbound ramps: Widen the roadway segment to an 8-lane Major Arterial.

TRANS 5.15-2: Balboa Avenue east of Clairemont Drive (Impact 5.15-2): Widen the roadway segment to a 6-lane Major Arterial.

TRANS 5.15-3: Mission Bay Drive (Impact 5.15-3)

a. Bluffside Avenue to Damon Avenue: Widen the roadway segment to a 5-lane Major Arterial.

b. Damon Avenue to Garnet Avenue: Widen the roadway segment to a 6-lane Major Arterial.

c. Garnet Avenue to Magnolia Avenue: Widen the roadway segment to a 5-lane Major Arterial.

d. Magnolia Avenue to Bunker Hill Street: Widen the roadway segment to a 5-lane Major Arterial.

e. Bunker Hill Street to Grand Avenue: Widen the roadway segment to a 5-lane Major Arterial.

f. Grand Avenue to I-5 Ramps: Widen the roadway segment to an 8-lane Major Arterial.

TRANS 5.15-4: Clairemont Drive from Denver Street to Morena Boulevard (Impact 5.15-4): Widen the roadway segment to a 6-lane Major Arterial.

Intersections

~~The TIS identified and evaluated intersection improvements that could mitigate the intersection impacts identified above. While the following intersection mitigation measures would reduce potentially significant impacts, only TRANS 5.15-5, TRANS 5.15-6, TRANS 5.15-7 and TRANS 5.15-9 are~~

~~proposed as part of the BASASP and associated discretionary actions.~~ During the course of environmental review, four intersection improvements were identified as feasible improvements that would reduce impacts to a less than significant level and have since therefore been incorporated into the Specific Plan as Supplemental Development Regulations (SDRs). These improvements were identified as:

TRANS 5.15-5: Garnet Avenue at Olney Street (Impact 5.15-5): Remove parking and restripe Olney Street to include northbound left-turn lane. This improvement is included as a development regulation in the BASASP.

TRANS 5.15-6: Garnet Avenue at Mission Bay Drive (Impact 5.15-6): Widen Garnet Avenue between Bond Street and Mission Bay Drive to include three eastbound through lanes (with the outside eastbound through lane becoming a right-turn lane at Mission Bay Drive) and construct a second westbound left turn lane. This improvement is included as a development regulation in the BASASP.

TRANS 5.15-7: Balboa Avenue at Morena Boulevard NB Ramps (Impact 5.15-7): Install a partial traffic signal to control the eastbound and northbound approaches. This improvement is included as a development regulation in the BASASP.

~~**TRANS 5.15-8:** Balboa Avenue at Clairemont Drive (Impact 5.15-8): Construct a southbound right-turn lane, second southbound left-turn lane, and a westbound right-turn lane.~~

TRANS 5.15-9: Morena Boulevard at Jutland Drive (Impact 5.15-9): Install a traffic signal or roundabout. This improvement is included as a development regulation in the BASASP.

~~As noted, all but one of the intersection improvements evaluated in the TIS ultimately were recommended for inclusion in the BASASP and associated discretionary actions.~~ TRANS 5.15-5, TRANS 5.15-6, TRANS 5.15-7, and TRANS 5.15-9 have been added to the BASASP as SDR-7, SDR-6, SDR-4 and SDR-5 respectively. The SDRs are as follows:

SDR-4 No building permits shall be issued for any project in areas designated Community Village until a traffic signal has been installed at the intersection of the Morena Boulevard northbound ramp and Balboa Avenue unless the warrants for a traffic signal are not met as determined by the City Engineer in accordance with Council Policy 200-06.

SDR-5 No building permits shall be issued for any project in areas designated Community Village until either a traffic signal or roundabout is installed at the intersection of Morena Boulevard and Jutland Drive, unless the warrants for the traffic signal are not met as determined by the City Engineer in accordance with Council Policy 200-06.

SDR-6 No building permits shall be issued for any project that would generate more than 1,000 Average Daily Trips (ADT) or 100 peak hour trips in areas designated Community Village until a second westbound left turn lane and an extended eastbound right turn lane are installed along Garnet Avenue at the intersection of Mission Bay Drive to the satisfaction of the City Engineer in accordance with Council Policy 200-06.

SDR-7 No building permits shall be issued for any project that would generate more than 1,000 Average Daily Trips (ADT) or 100 peak hour trips in areas designated Community Village until a northbound left-turn lane at the intersection of Garnet Avenue and Olney Street is installed to the satisfaction of the City Engineer in accordance with Council Policy 200-06.

While the following mitigation measure would reduce potentially significant impacts, TRANS 5.15-8 is not included as part of the Morena Corridor Specific Plan and associated discretionary actions.

TRANS 5.15-8: Balboa Avenue at Clairemont Drive (Impact 5.15-8): Construct a southbound right-turn lane, second southbound left-turn lane, and a westbound right-turn lane.

Freeway Segments

No mitigation measures are identified for impacts to freeways because freeway improvements are not within the authority of the City. The improvements identified in SANDAG's RTP would improve operations along the freeway segments and ramps; however, to what extent is still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. The City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level developments proceed, to develop potential "fair share" multi-modal mitigation strategies for freeway impacts, as appropriate. The following are the freeway mainline improvements identified in SANDAG's RTP:

TRANS 5.15-10: I-5 NB and SB from SR-52 to Clairemont Drive (Impact 5.15-10): SANDAG San Diego Forward 2050 Revenue Constrained Network includes operational improvements and construction of managed lanes along I-5 between SR-52 and Clairemont Drive. This project is expected to be constructed by the year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

Ramp Meter Analysis

TRANS 5.15-11: The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Improvements could include additional lanes, interchange reconfigurations, Transportation Demand Measures (TDM); however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. Furthermore, implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements. Additionally, the BASASP includes a variety of transit, pedestrian and bicycle facilities that may help to reduce single-occupancy vehicle (SOV) travel which can help improve ramp capacity. (Impact 5.15-11 and 5.15-12).

5.15.6.3 Significance After Mitigation

Roadway Segments

As described above, traffic mitigation measures were identified for each roadway segment with significant impacts that would result in operations better than existing conditions. Based on the feasibility of the traffic mitigation measures, no segment improvements are recommended as part of the BASASP. Therefore, impacts to the 11 identified roadway segments along Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive would remain significant and unavoidable upon implementation of the BASASP based on the following as described below:

- Implementation of the improvements are contrary to the overall goal of promoting smart growth and alternative forms of transportation in the community; or
- Sufficient ROW does not exist to construct the improvements.

One of the primary principles of smart growth is to encourage the use of alternative forms of transportation by discouraging reliance on the private automobile. As the improvements identified above would reduce traffic congestion and encourage automobile use, these mitigation measures can generally be considered inconsistent with the overall goals of the City's General Plan and BASASP. Additionally, roadway and intersection widening could impact existing or proposed pedestrian (such as at Clairemont Drive and Balboa Avenue intersection) or bicycle facilities, which could discourage walking and bicycling. As such, mitigation measures evaluated for Garnet Avenue, Balboa Avenue, Mission Bay Drive, and Clairemont Drive segments are considered infeasible due to policy considerations.

Due to the degree of development adjacent to some of the improvements, their construction is considered infeasible due to the impact on the adjacent development. This is based both on the high cost of acquiring additional ROW as well as potential additional structure removal, which could result in additional air quality, noise, GHGs, and solid waste environmental effects, as well as increased pedestrian diversion at the intersection of Balboa Avenue and Clairemont Drive.

Intersections

~~Traffic mitigation measures~~ Intersection improvements were identified for each intersection with significant impacts that would result in operations better than existing conditions. All but one of these is recommended for inclusion as part of the BASASP as SDRs. Thus, intersection impacts to Garnet Avenue at Olney Street (Impact 5.15-5), Garnet Avenue at Mission Bay Drive (Impact 5.15-6), Balboa Avenue at Morena Boulevard NB Ramps (Impact 5.15-7), and Morena Boulevard at Jutland Drive (Impact 5.15-9) would be reduced to less than significant levels with implementation of the BASASP. Impacts to the intersection of Balboa Avenue at Clairemont Drive (Impact 5.15-8), however, would remain significant and unavoidable upon implementation of the BASASP for the reasons discussed above under Roadway Segments. This intersection will be further studied as a part of the ongoing comprehensive Clairemont Community Plan Update effort and future mobility improvements to this intersection could be proposed as part of that effort.

Freeway Facilities

Likewise, impacts to Caltrans facilities (Impacts 5.15-10 through 5.15-12) would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance will occur prior to the assumed buildout of 2035.

27. The second page of Table 6-2, on page 6-7, is revised as follows:

Table 6-2
SUMMARY OF CUMULATIVE IMPACTS

Environmental Subject	Impact Category	Cumulative Impact	Cumulatively Considerable
Land Use	Consistency with Adopted Plans, Policies, and Regulations	LS	No
	Environmental Plan Consistency	LS	No
	Community Division	LS	No
Air Quality	Regional Air Quality Plan Conformance	SU	Yes
	Air Quality Standards Conformance - Construction Emissions	SU	Yes
	Air Quality Standards Conformance - Operation Emissions	SU	Yes
	Cumulatively Considerable Net Increase of Criteria Pollutants	SU	Yes
	Sensitive Receptors	LS	No
	Odors	LS	No
Biological Resources	Sensitive Species	LSM	No
	Sensitive Habitats	LSM	No
	Wetlands	LSM	No
	Wildlife Movement	LS	No
	Conservation Planning	LS~~M~~	No
	MHPA Edge Effects	LS~~M~~	No
	Conflicts with Local Policies/Ordinances	LS~~M~~	No
	Invasive Species	LS~~M~~	No
Energy	Energy Consumption	LS	No
Geology and Soils	Geologic Hazards	LS	No
	Erosion and Sedimentation	LS	No
	Geologic Stability	LS	No
Greenhouse Gas Emissions	Direct and Indirect GHG Emissions	LS	No
	Consistency with Adopted Plans, Policies, and Regulations	LS	No
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	Yes
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	Yes
	Tribal Cultural Resources	SU	Yes
Human Health/Public Safety/Hazardous Materials	Health Hazards	LS	No
	Flood Hazards	LS	No
	Emergency Response and Evacuation Plans	LS	No
	Wildfire Hazards	LS	No

Table 6-2 (cont.)
SUMMARY OF CUMULATIVE IMPACTS

Hydrology, Water Quality, and Drainage	Runoff	LS	No
	Pollutant Discharges	LS	No
	Water Quality	LS	No
Noise	Compatibility of Proposed Land Uses with City Noise Guidelines	LSM	No
	Substantial Noise Increase	LS	No
	Vibration	LSM	No
	Construction Noise	LSM	No
Paleontological Resources	Sensitive Formations	LS ~~SU~~	No ~~Yes~~
Population and Housing	Population Displacement	LS	No
	Growth Inducement	LS	No
Public Services	Public Services and Facilities	LS	No
Transportation/Circulation	Water Supply	LS	No
	Utilities	LS	No
	Solid Waste Management	LS	No
	Alternative Transportation Modes	LS	No
	Plans or Policies Supporting Alternative Transportation	LS	No
	Road Segments, Intersections, and Freeway Facilities	SU	Yes
Visual Effects and Neighborhood Character	Public Views	LS	No
	Neighborhood Character	LS	No
	Landform Alteration	LS	No
Agriculture and Forestry Resources	Agriculture	LS	No
	Forestry Resources	LS	No
Mineral Resources	Minerals	LS	No

LS = less than significant
LSM = less than significant with implementation of project-specific mitigation
SU = significant and unavoidable

28. Section 6.3. is revised as follows:

6.3.3.5 Conservation Planning

The analysis in Section 5.3.8 of this PEIR concludes that implementation of future projects under the proposed BASASP generally would be consistent with the currently designated MHPA preserve areas. By avoiding impacts to Rose Creek, impacts to the MHPA would also be avoided, unless impacts occur to those previously developed areas within the MHPA. MHPA in the southwestern portion of the BASASP area includes developed land north of Garnet Avenue, where development is expected to occur within the BASASP area. A MHPA Boundary Line Correction in close coordination with the City as well as state and federal wildlife agencies would allow project activities associated with future specific projects under the proposed BASASP to occur within areas of the MHPA that are developed

(see also discussion in Section 6.3.1.2, above). Therefore, project impacts related to MHPA consistency would be less than significant.

The analysis in Section 5.3.8 of this PEIR concludes that implementation of the proposed BASASP could introduce new land uses adjacent to the MHPA and that future development proposals could result in potentially significant indirect impacts to adjacent MHPA lands. ~~Future discretionary development projects under proposed BASASP are required to comply with~~ Projects that would affect ESL would be subject to the City's ESL Regulations including the MSCP Subarea Plan Section 1.4.3 Land Use Adjacency Guidelines. Required measures include: barriers/permanent fencing where development is adjacent to the MHPA, with signs as appropriate; use of structural and nonstructural BMPs, including sediment catchment devices during construction, and appropriate direction of drainage; direction of outdoor lighting adjacent to the MHPA away from the MHPA or shielded to prevent light over-spill; restrictions on invasive non-native plant species and use of native species; approval and maintenance of brush management areas; restricted access to the MHPA; controls on toxics/products potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality; and minimization of noise impacts through berms or walls adjacent to uses that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Noise must also be controlled during the breeding season of sensitive species, as well as during the rest of the year.

As noted above, some of the cumulative projects in Table 6-1 do not require conservation planning per se as they are within wholly developed areas. Alternatively, the parks and Tecolote Canyon plans specifically address these issues. Adherence to the guidelines would lower project-specific impacts to a less than significant level for each of the projects, and potential cumulative impacts related to conservation planning from implementation of the proposed BASASP would also be less than significant and not cumulatively considerable.

6.3.3.6 MHPA Edge Effects

Many of the cumulative projects in Table 6-1 do not require consideration of MHPA edge effects as they are not located adjacent to MHPA. There are MPHA lands within the BASASP (refer to Figure 5.3-2 of this PEIR). The BASASP portion of the MHPA is surrounded by land designated for residential and commercial uses. Future BASASP-related development adjacent to the MHPA could adversely impact adjacent MHPA from edge effects related to drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development that could degrade habitat or alter animal behavior within the preserve, which could be significant. ~~Adherence to~~ Projects that would affect ESL would be subject to the City's ESL Regulations, including the MHPA Land Use Adjacency Guidelines ~~would reduce those impacts to below a level of significance at the project level~~. Because edge effects would be directly addressed through the MHPA Land Use Adjacency Guidelines, potential cumulative impacts related to MHPA edge effects from implementation of the proposed BASASP would be less than significant and not cumulatively considerable.

6.3.3.7 Conflicts with Local Policies/Ordinances

As stated in Section 5.3.10 of this PEIR, the City's ESL Regulations require avoidance, to the maximum extent practical, of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemic species. ~~The regulations also state that wetland impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable.~~

~~Because future~~ Future development projects ~~proposed in accordance with the BASASP~~ would be ~~required to comply with all applicable~~ subject to the City's ESL Regulations~~, no conflicts with those regulations would occur.~~ Past, present, and reasonably foreseeable projects building out within the cumulative study area would also be required to conform to the same regulations. Based on the described considerations, potential cumulative impacts related to conflicts with local policies and ordinances would be less than significant and BASASP-related contributions would also be less than significant and not cumulatively considerable.

6.3.3.8 Introduction of Invasive Species

Section 5.3.11 of this PEIR concludes that future development projects within or adjacent to the MHPA or Rose Creek have the potential to introduce invasive species through the use of exotic/invasive plant species in landscaping, which is considered significant on a project level.

~~The introduction of invasive species would be addressed in accordance with the requirements of~~ Projects that would affect ESL would be subject to the City's ESL Regulations including the MHPA Land Use Adjacency Guidelines. ~~By meeting the requirements of the MHPA Land Use Adjacency Guidelines, impacts from the introduction of invasive species associated with future BASASP development would be less than significant.~~

As appropriate, other projects building out with potential invasive species impacts would ~~be required to conform to~~ also be subject to the City's ESL Regulations, including the MHPA Land Use Adjacency Guidelines (some projects are not located adjacent to any natural habitats). Based on these considerations, potential cumulative impacts related to the introduction of invasive species relative to the projects in Table 6-1 are assessed as less than significant and contributions from implementation of the proposed BASASP would be less than significant and not cumulatively considerable.

29. Section 6.3.11, Paleontological Resources, of the Cumulative Impacts Chapter is revised as follows:

Development under the BASASP could involve excavation of previously undeveloped areas, some of which may consist of unique paleontological resources with fossil-bearing potential. Potential cumulative impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the county as the county continues to develop in response to projected population growth. Likewise, development of the BASASP area may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring. This regulation would apply to projects within and outside of the BASASP area, and thus, cumulative impacts would be less than significant.

~~The General Plan PEIR identifies potentially significant impacts to paleontological resources in association with excavation and grading requirements for new development.~~

~~As noted in Section 5.11.3.1 of this PEIR, the BASASP area includes a number of formations (old paralic deposits, San Diego, Scripps, Mount Soledad, Ardath Shale) characterized with a high paleontological resources sensitivity rating. While portions of the BASASP area encompassing these formations have been previously disturbed and developed with existing urban uses, grading associated with future development activities could potentially expose undisturbed formational areas. Based on the presence of formational units exhibiting high potential for the occurrence of sensitive paleontological resources in the BASASP area, associated BASASP-related potential impacts from future development activities could be significant. A mitigation measure, PALEO-1, is provided.~~

~~Mitigation Measure PALEO-1 requires future discretionary projects to be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds. Monitoring for paleontological resources during construction activities would be implemented at the project level and provide mitigation for the loss of important fossil remains. The measure requires review of each future discretionary project prior to approval to assess the underlying geologic formations, and determine, based on resource significance, if the cubic yards of excavation would require additional action. As appropriate, monitoring is required, with additional mitigation to occur as appropriate. Implementation of actions pursuant to Mitigation Measure PALEO-1, would reduce BASASP-related impacts to important paleontological resources resulting from implementation of discretionary projects to less than significant for future development.~~

~~Future ministerial projects would also likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, BASASP impacts related to future ministerial development would remain significant and unavoidable.~~

~~Cumulatively, the importance of individual paleontological resources is related to the inherent scientific data and associated research value. Information gained from test excavations and data recovery programs within the study area and other locations having paleontological resource impacts would be presented in reports and filed with appropriate regulatory agencies and scientific institutions with permanent paleontological collections, such as the San Diego Natural History Museum. The fossil collections from any potentially significant site also would be curated at such a scientific institution and would be available to other paleontologists for further study. For discretionary development projects, the cumulative projects identified in Table 6-1 would be subject to similar analysis and (if applicable) mitigation requirements for paleontological resources. Based on the required compliance of both the proposed project and applicable cumulative projects with the analysis and mitigation requirements for paleontological resources, future discretionary development associated with implementation of the proposed BASASP would not result in significant cumulative paleontological resource impacts and would not be cumulatively considerable.~~

~~Future ministerial development implemented under the proposed project and other program- or plan-level projects identified in Table 6-1 could result in the cumulative loss of paleontological resources throughout the county. Thus, future ministerial development associated with implementation of the proposed BASASP would result in significant cumulative paleontological resource impacts, with project related contributions being considerable. Such cumulative impacts would remain significant and unavoidable.~~

30. Section 6.3.14.2 is revised as follows:

6.3.12.2 Utilities

As described in Section 5.14.5.1, the General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed BASASP would result in infill, redevelopment, and an increase in population within selected areas as stated in the proposed BASASP. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure as well as various communications systems. However, some infrastructure such as aging pipelines are in need of replacement. The BASASP area's existing infrastructure deficiencies would require capacity improvements and replacement schemes to serve the existing and projected population. The section reviews issues related to Water Distribution; Wastewater Collection, Treatment, and Disposal; Stormwater Conveyance; and Communications.

Section 5.14.5.2 concludes that ~~systematic improvements to~~ water, wastewater, and storm water facilities throughout the BASASP area are upgraded and repaired ~~expected to be provided~~ as gradual replacement of aging and substandard infrastructure is needed. Upgrades such as increasing the sizing and replacement of existing water, sewer, and storm water pipelines and mains are an ongoing process. Upgrades to water and sewer are ~~administered by the PUD and are~~ handled on a project-by-project basis through the City's Capital Improvements Program (CIP). Upgrades to and maintenance of public storm water facilities or facilities granted and accepted via easement are administered by the City's Transportation and Storm Water Department (T&SW). Per City Council Policy 800-04, private land owners and developers are responsible for upgrading and maintaining storm water drainage facilities on private property. Future development pursuant to the BASASP would increase demand for water and sewer facilities, which could create a need to increase sizing of existing facilities. However, the Public Works Department (PWD), which oversees the CIP, plans capital improvement projects several years prior to actually reaching capacity. As the BASASP area is already urbanized and the existing water and sewer facilities are within existing ROW that has previously been graded, upgrades and repairs to the existing facilities as a result of increased demand from development per the BASASP would not have a significant effect on the environment. Therefore, impacts to water, sewer, and storm water utilities would be less than significant. Because utility and communications providers have the capacity to serve the BASASP area, project-level impacts would be less than significant. ~~To be confirmed upon receipt of additional technical reports.~~

Cumulatively, the proposed BASASP would be consistent with applicable elements of the General Plan, and potential cumulative impacts associated with storm water, water, wastewater, and communication systems would be less than significant. The conditions described above relative to routine upgrades and existing presence of service providers also would pertain to other service-requiring projects listed on Table 6-1. Cumulative impacts would be less than significant, and the project's contribution would not be cumulatively considerable.

31. Section 9.1, Significant and Unavoidable Impacts, has been revised as follows:

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the EIR. For the proposed project, impacts related to air quality (air quality plan consistency,

construction and operations air emissions, and cumulative air emissions), historical and tribal cultural resources, noise (vibration and construction noise), ~~paleontological resources (ministerial development),~~ and cumulative transportation/circulation impacts (impacts to roadway segments, intersections, and freeway facilities) would remain significant and unavoidable effects of the proposed project (refer to Section 5.2, *Air Quality*, Section 5.7, *Historical and Tribal Cultural Resources*, Section 5.10, *Noise*, ~~Section 5.11, *Paleontological Resources*,~~ and Section 5.15, *Transportation/Circulation*, for further detail). All other significant impacts identified in Chapter 5.0 of this PEIR can be reduced to below a level of significance with implementation of the Mitigation Framework identified in Chapter 5.0, as well as through compliance with adopted General Plan and proposed BASASP policies, as well as applicable federal, state, and/or local regulations.

32. Page 10-2 of Chapter 10.0, Alternatives, has been revised as follows:

- The extent to which the alternative would avoid or substantially lessen any of the significant direct and/or cumulative environmental effects of the BASASP including:
    - Air Quality (direct and cumulative);
    - Biological Resources (direct);
    - Historical and Tribal Cultural Resources (direct and cumulative);
    - Noise (direct); <u>and</u>
    - ~~Paleontological Resources (direct and cumulative); and~~
    - Transportation/Circulation (direct and cumulative).

33. Table 10-1 has been revised as follows:

Table 10-1
COMPARISON OF PROPOSED PROJECT IMPACTS
WITH IMPACTS FROM THE PROJECT ALTERNATIVES

Notes

LS = Less than significant SU = Significant and unavoidable = = equal to proposed project

SM = Significant and mitigated + = *more than proposed project* - = less than proposed project

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Air Quality	Regional Air Quality Plan Conformance	SU	SU	LS	LS	SU (-)	SU (-)
	Construction Emissions	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Operation Emissions	SU	SU	SU (-)	SU (-)	SU (-)	SU (-)
	Sensitive Receptors	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Odors	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
Biological Resources	Sensitive Species	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Sensitive Habitats	SM	LS	SM (=)	LS (=)	SM (=)	LS (=)
	Wetlands	LS	LS	SM	LS (=)	LS (=)	LS (=)
	Wildlife Movement	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Conservation Planning	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	LS ~~SM~~ (=)	LS (=)
	Edge Effects	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	LS ~~SM~~ (=)	LS (=)
	Policy Conformance	LS	LS	LS (=)	LS (=)	LS (=)	LS (=)
	Invasive Species	LS ~~SM~~	LS	LS ~~SM~~ (=)	LS (=)	LS (=)	LS (=)
Historical and Tribal Cultural Resources	Historic Buildings, Structures, Objects, or Sites	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)
	Tribal Cultural Resources	SU	SU	SU (-)	SU (-)	SU (=)	SU (=)

Table 10-1 (cont.)
COMPARISON OF PROPOSED PROJECT IMPACTS
WITH IMPACTS FROM THE PROJECT ALTERNATIVES

Environmental Subject	Impact Category	Proposed BASASP		No Project: Adopted Community Plans		Medium Density	
		Direct	Cumulative	Direct	Cumulative	Direct	Cumulative
Noise	Regulatory Conformance	SM	LS	SM (=)	LS (=)	SM (-)	LS (=)
	Noise Levels	LS	LS	LS (-)	LS (-)	LS (-)	LS (-)
	Vibration	SU	LS	SU (-)	LS (-)	SU (-)	LS (-)
	Construction Noise	SU	LS	SU (=)	LS (=)	SU (=)	LS (=)
~~Paleontological Resources~~	~~Sensitive Formations~~	~~SU~~	~~SU~~	~~SU (-)~~	~~SU (-)~~	~~SU (=)~~	~~SU (=)~~
Transportation/ Circulation	Alternative Mode Trips	LS	LS	SU (+)	SU (+)	~~SU~~ LS (+)	~~SU~~ LS (+)
	Alternative Transportation	LS	LS	SU (+)	SU (+)	LS (-)	LS (-)
	Road Segments, Intersections, and Freeway Facilities	SU	SU	SU (+)	SU (+)	SU (-)	SU (-)

34. Section 10.1.2.2, Biological Resources, has been revised as follows:

The majority of the BASASP area is developed and does not contain sensitive resources, as described in Section 5.3, *Biological Resources*. The exception is the open space area associated with Rose Creek and some limited undeveloped land. While the No Project Alternative would result in generally lower development intensity than the proposed BASASP (refer to Table 10-2), it would allow for development/disturbance in similar areas adjacent to the Rose Creek open space and its sensitive resources. Accordingly, the No Project Alternative would be expected to result in similar significant impacts to biological resources, as described for the proposed BASASP, including direct and indirect effects to sensitive species and sensitive habitats. However, the No Project Alternative has a greater potential to result in impacts to wetlands because of policies within the proposed BASASP that prohibit development within wetland areas. As noted for the proposed BASASP, detailed analyses of individual development projects would be required, and mitigation measures identified in the mitigation framework associated with the proposed BASASP would be implemented on a project-level. All proposed development under the No Project Alternative, as well as the proposed BASASP, adjacent to the MHPA would be required to comply with the ~~MSCP~~ MHPA Land Use Adjacency Guidelines and related mitigation, as described in Section 5.3, to prevent MHPA edge effects. Thus, the potential impacts of the No Project Alternative to sensitive species, ~~and~~ sensitive habitats, and wetlands would be less than significant (with mitigation incorporated) as with the proposed BASASP.

~~Similar to the proposed BASASP, the No Project Alternative would be expected to result in potentially significant, but mitigable, impacts related to conservation planning and introduction of invasive species, as described in Section 5.3.~~

The No Project Alternative would also be expected to result in less than significant impacts for issues related to wildlife movement, conservation planning, MHPA edge effects, ~~and~~ conflicts with local policies/ordinances, and the introduction of invasive species, for similar reasons as noted for the proposed BASASP in Section 5.3 of the PEIR. Specifically, implementation of subsequent development project submittals under the No Project Alternative would be required to adhere to applicable federal, state, and local regulations regarding the protection of biological resources, as described in Section 5.3 (similar to projects implemented under the proposed BASASP). Significant impacts to biological resources would not occur under this alternative.

35. Section 10.1.2.5, Paleontological Resources, has been revised as follows:

~~Section 10.1.2.5 Paleontological Resources~~

~~As with the proposed BASASP, future development under the No Project Alternative has the potential to result in significant direct impacts to paleontological resources. Implementation of future projects under the No Project Alternative would require adherence to all applicable guidelines, as described in Section 5.11, Paleontological Resources. The significance of impacts to paleontological resources from implementation of the No Project Alternative would be similar to those identified for the proposed BASASP because the areas of development-related disturbance would generally be the same (with associated changes to land use designations/zoning). As with the proposed BASASP, potentially significant impacts to paleontological resources at the project level would require strict adherence to the mitigation framework outlined in Section 5.11, and implementation of those measures would reduce potential impacts to less than significant for future discretionary development. Like the proposed BASASP, impacts related to future ministerial development that would occur under the No Project Alternative would remain significant and unavoidable because there is no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring.~~

36. Section 10.2.2.2, Biological Resources, has been revised as follows:

The Medium Density Alternative would have a similar development footprint as the proposed BASASP, with the extent of impacts to biological resources under this alternative also similar to that described for the proposed BASASP. The amount of open space, extent of disturbance from future development, and related impacts to sensitive resources, including habitats and species, under this alternative also would be similar to the proposed BASASP. Accordingly, this alternative would be expected to result in similar significant impacts to biological resources, as described for the proposed BASASP, including effects to sensitive species and sensitive habitats. Pursuant to the analysis in Section 5.3, detailed analyses of individual development projects would be required, and mitigation would be implemented on a project level. All proposed development under the Medium Density Alternative, as well as under the proposed BASASP, adjacent to the MHPA would be required to comply with the ~~MSCP~~ MHPA Land Use Adjacency Guidelines, as described in Section 5.3. As a result, direct and indirect impacts to sensitive species, sensitive habitats, and wetlands ~~conservation planning, edge effects, and invasive species~~ under the Medium Density Alternative would be reduced to less than significant levels with mitigation, similar to the proposed BASASP.

The Medium Density Alternative would be expected to result in less than significant impacts for issues including wildlife movement, conservation planning, MHPA edge effects, conflicts with local

policies/ordinances, and the introduction of invasive species, for similar reasons as noted for the proposed BASASP in Section 5.3. Less than significant impacts to biological resources would occur under this alternative.

37. Section 10.2.2.5, Paleontological Resources, has been revised as follows:

~~Section 10.2.2.5 Paleontological Resources~~

~~As with the proposed BASASP, future development under the Medium Density Alternative has the potential to result in significant direct impacts to paleontological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines, as described in Section 5.11. The extent of impacts to paleontological resources from implementation of the Medium Density Alternative would be similar to those identified for the proposed BASASP, because the areas of development-related disturbance would generally be the same (with associated changes to land use designations/zoning). Similar to the proposed BASASP, strict adherence to the mitigation framework identified in Section 5.11 would be required and would reduce potential impacts to less than significant for future discretionary development. Like the proposed BASASP, impacts related to future ministerial development that would occur under the Medium Density Alternative would remain significant and unavoidable because there is no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring.~~

38. The third paragraph of Section 10.3, Environmentally Superior Alternative, has been revised as follows:

Of the remaining alternatives, the environmentally superior alternative is the Medium Density Alternative. This alternative would reduce cumulatively significant and unavoidable impacts to transportation/circulation (intersections but not roadway and freeway segments). The Medium Density Alternative would also result in similar or reduced impact levels for issue areas determined to be significant under the proposed BASASP, including air quality, biological resources, historical and tribal cultural resources, and noise~~, and paleontological resources.~~ As described for the proposed BASASP, this alternative would have cumulatively significant and unavoidable impacts related to air quality, historical and tribal cultural resources, ~~paleontological resources~~ and transportation/circulation.

39. The second paragraph of Section 10.4, Alternatives Considered But Rejected, has been revised as follows:

A Mobility Improvements Alternative was considered to reduce the environmental effects of the BASASP related to air quality, biological resources, historical and tribal cultural resources, noise, ~~paleontological resources,~~ and transportation/circulation. This alternative would retain all the mobility connectivity improvements to the planned Balboa Avenue Station, as well as the other mobility improvements outlined in the BASASP. This alternative would not include any zoning or land use changes. This alternative was rejected from further consideration as it would not achieve a majority of the project objectives, and would not be consistent with the Climate Action Plan or the General Plan's City of Villages Strategy. The primary objective of the BASASP is to establish a transit-oriented village, and removing all land use changes would not provide for the realization of this goal.